

EMPLOYEE

Privacy Policy

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I. Definitions and scope

This Employee Privacy Policy aims to present the information in a transparent and clear manner that shall enable the Employees to easily understand the processing of their personal data by the AccorInvest Entities.

The terms used in this document such as “Personal Data” or “Processing” have the meaning given to them by the glossary in **Section VIII** or, failing that, by the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals in relation to the processing of personal data and the free circulation of this data (the “**GDPR**”) or any applicable local data protection legislation¹) (together, the “**Applicable DP Legislation**”).

This Employee Privacy Policy applies to the Processing of the Personal Data of the following individuals:

- employees working for AccorInvest Entities, including interns and work-study trainees,
- workers and contractors (only applies in the UK)²;
- candidates for positions within an AccorInvest Entity; and
- former employees (and, in the UK, former workers and contractors) of AccorInvest Entities.

For the purposes of this document, these persons are generally referred to as “**Employees**”.

For the avoidance of doubt, this Employee Privacy Policy does not apply to the Personal Data of:

- customers of AccorInvest’s hotels (for which you should refer to the [Customers Privacy Policy](#)); or
- other data subjects such as suppliers, shareholders or visitors (for which you should refer to the [Third Parties Privacy Policy](#)).

This Employee Privacy Policy covers all AccorInvest Entities’ activities, from hotel operations to asset management and support activities.

In respect to the Processing activities described in this Employee Privacy Policy, the data controller is the AccorInvest Entity with which the Employee has, or had

¹ Including in relation to the United Kingdom, the UK General Data Protection Regulation and the Data Protection Act 2018 (together, the “UK GDPR”)

² For the Processing of the Personal data of workers and contractors, in countries other than the United Kingdom, please refer to the [Third Parties Privacy Policy](#)

in the past, an employment contract, or the AccorInvest Entity with which it is in a recruitment process.

Also note that in addition to the Group Data Protection Officer (“DPO”) designated, AccorInvest Entities may have appointed local DPOs (e-mail address of the DPO according to the nationality of the AccorInvest entity in **Appendix 1**). The local DPO is the main contact for the national Data Protection authorities and the contact person in the Entity regarding personal data protection matters.

This Employee Privacy Policy describes how we collect and use your Personal Data during and after your working relationship with us, in accordance with Applicable DP Legislation.

We reserve the right to update this Employee Privacy Policy at any time. We may also notify you in other ways from time to time about the Processing of your Personal Data.

II. Data processing principles

AccorInvest is committed to complying with all laws and regulations that govern the Processing of Personal Data. Accordingly, AccorInvest undertakes to apply the following principles:

- **Data collection for specific purposes - lawfulness and fairness of Processing**

Personal Data is collected and Processed solely for the purposes and in the contexts described in **Section IV** of this Employee Privacy Policy.

Any Processing of Personal Data by AccorInvest will have a lawful basis (such as consent, the performance of a contract or legal obligation, or the pursuit of a legitimate interest) as required under Applicable DP Legislation.

- **Transparency**

Personal Data is collected and Processed in a manner that is transparent and easily understandable by the Employee.

- **Data minimisation and storage limitation**

AccorInvest will only collect Personal Data that is adequate, relevant and not excessive, having regard to the purposes for which it is Processed as described in **Section IV**.

The Personal Data Processed is kept only for the time required for the purposes described in **Section IV** and the rules that apply to the storage and archiving of Personal Data.

- **Data security**

AccorInvest protects Personal Data from destruction, loss, tampering, disclosure or unauthorised use.

Accordingly, technical and organisational measures such as the management of access rights and computer file security (e.g. passwords, encryption) are implemented to ensure the confidentiality, integrity and availability of the Personal Data.

III. Personal Data collected

As Data Controller, AccorInvest collects and Processes different categories of Employees' Personal Data.

The Personal Data collected may be:

- identity and identification data (e.g., surname, first name, gender, nationality, date and place of birth, photographs, voice) and contact information (e.g., postal address, e-mail address and telephone number);
- social information (e.g., social security number, work permit, disability information);
- insurance, pension and benefits information;
- information about the Employee's family situation (e.g., marital status, surname, first name and date of birth of the spouse, partner, children or any dependants, next of kin and emergency contact information);
- information about training and career (e.g., degrees, CV, career planning, annual assessments and appraisals);
- professional information (e.g., employment contract, start date (and, if different, the start date of your continuous employment) identification number, positions held, working hours, absences and paid leave, training records, leaving date and your reason for leaving);
- economic and financial information (e.g., tax status, salary, rank, compensation, pension fund contributions, bank details, payroll records);
- disciplinary and grievance information;
- data on the use of AccorInvest's information system (e.g., IP address, login data);
- location data (e.g., travel information);
- data from CCTV and control of access to premises (e.g., security passes);
- data collected in connection with the whistleblowing system;
- copy of your driving licence if you are required drive in the course of your employment;
- any other Personal Data collected in the course of the working relationship or provided by the Employee in his or her application.

AccorInvest may also Process certain Special Categories of Personal Data such as information revealing racial or ethnic origin, religious beliefs, union membership, biometric data or health data.

Where Special Categories of Personal Data are Processed AccorInvest ensures that at least one of the following conditions is met:

- the Employee has given his or her express consent
- Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of AccorInvest or the Employee under applicable employment, social security or social protection laws
- the information is made public by the Employee
- Processing is necessary to protect the vital interests of the Employee
- Processing is justified by public interest
- Processing is necessary for the observation, exercise or defence of a legal claim, or
- Processing is necessary for preventive or occupational medicine, assessment of Employee's fitness for work, medical diagnoses, healthcare or social welfare, or management of health care or social protection services systems.

IV. Purposes and legal basis of Processing

The Processing of Personal Data is carried out for one or more specific and legitimate purpose(s). A Processing purpose may have one or more grounds for the lawfulness of the processing.

The lawful Processing of Personal Data is necessary to achieve the following purposes:

Processing purposes	Legal basis for Processing
<p>Compliance with applicable legislation. For example:</p> <ul style="list-style-type: none"> • complying with AccorInvest's obligations relating to: <ul style="list-style-type: none"> • sick, maternity and paternity leave; • working hours; • accidents in the workplace and while commuting; • disabilities' management; • diversity; • payroll management: salaries and benefits due under the Employee's employment contract, annual salary increases and other adjustments, annual bonus payments and pension management; income taxes and social security contributions deducted at source; • managing relations with staff representative institutions and organising representative elections; • complying with Applicable DP Legislation; • managing whistleblowing systems and reports, due diligences processes, compliance and ethics issues. 	<p>Necessary to comply with a legal obligation.</p>
<p>Responding to requests from the police or from judicial or administrative authorities in the event of an inspection, audit or investigation according to the applicable law.</p>	<p>Necessary to comply with a legal obligation.</p>

<p>Applying disciplinary sanctions in accordance with applicable law.</p>	<p>Necessary for the performance of the contract to which the Employee is party.</p>
<p>Allowing AccorInvest Entities to protect their rights or substantiate any claim, defence or statement in a case or before the judicial and/or administrative authorities, an arbitration tribunal or a mediator, in connection with actions, disciplinary investigations or an internal or external audit or investigation.</p>	<p>Necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in protecting their rights and interests.</p>
<p>Checking qualifications and other documents during the recruitment process of Employees, and onboarding of new Employees. The candidates' Personal Data is collected either directly or indirectly by an AccorInvest Entity (including collection through recruitment agencies) so that the AccorInvest Entity concerned can assess the candidate's suitability for the role (e.g. checking the candidates skills, psychometric tests, qualifications and references) and, if the candidate is recruited, to facilitate his/her onboarding in the AccorInvest Entity.</p>	<p>Necessary for the performance of a contract to which the Employee is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in organising the integration of their new employees.</p> <p>Necessary to comply with a legal obligation</p>
<p>Managing the career development and the mobility of Employees within the Group.</p>	<p>Necessary for the performance of a contract to which the Employee is party or in order to take steps at the request of the data subject prior to entering into a contract.</p>
<p>Providing services and benefits to Employees: lunch vouchers, access to a company or inter-company canteen, covering transport costs, expenses claims, etc.</p>	<p>Necessary for the performance of the contract to which the Employee is party.</p> <p>Necessary to comply with a legal obligation.</p>

<p>Managing performance and talent: facilitating the management of Employees' performance, career development, including annual performance evaluations and annual salary reviews and measuring Employees' engagement.</p>	<p>Necessary for the performance of the contract to which the Employee is party.</p> <p>Necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in assessing the Employees' performance.</p> <p>Necessary to comply with a legal obligation.</p>
<p>Organising social company events (seminars, conventions, entertainments etc.)</p>	<p>Necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in organizing company events.</p> <p>Consent to the Processing of the Employees Personal Data for one or more specific purposes has been given (where applicable).</p>
<p>Promoting the Group, its brands, values and all its activities in the context of its internal communication for:</p> <ul style="list-style-type: none"> • the management of the organisational chart, • internal notes, • the welcome guide, • the Intranet, • the AccorInvest Group's website, • the use of communication tools (e.g., MS Teams) 	<p>Necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in managing its internal communication.</p> <p>Consent to the Processing of the Employees Personal Data for one or more specific purposes has been given (where applicable).</p>
<p>Promoting the Group, its brands, values and all its activities in the context of its external communication, i.e., to the general public, clients, partners, suppliers, institutions, in particular in the context of brochures, communication on social networks and on websites.</p>	<p>Necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in managing its external communication.</p> <p>Consent to the Processing of the Employees Personal Data for one or more specific purposes has been given (where applicable).</p>

<p>Managing the Employee leaving process, including exit interview and providing outplacement services.</p>	<p>Necessary to comply with a legal obligation.</p> <p>Consent to the Processing of the Employees Personal Data for one or more specific purposes has been given (where applicable).</p> <p>Necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in assisting its Employees.</p>
<p>Allowing Employees to access and use AccorInvest’s IT tools.</p>	<p>Necessary for the performance of the contract to which the Employee is party.</p>
<p>Ensuring security in particular in respect of:</p> <ul style="list-style-type: none"> • access to premises (e.g., security passes and CCTV recordings); • preventing and managing incidents against persons or assets (e.g., thefts, assaults, degradations); • internal and external investigation made by authorities (e.g., CCTV recordings); • access to and use of IT tools, in accordance with AccorInvest’s IT Security Policy or specific rules adopted by each AccorInvest Entity. 	<p>Necessary for the performance of the contract to which the Employee is party.</p> <p>Necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in ensuring the security of premises and infrastructure.</p> <p>Consent to the Processing of the Employees Personal Data for one or more specific purposes has been given (where applicable).</p> <p>Necessary to comply with a legal obligation.</p>

<p>Day to day management of AccorInvest Entities operations for the following purposes, such as:</p> <ul style="list-style-type: none"> • planning and budgeting; • staff management; • managing directories and social networks; • managing Employees’ files; • financial reporting; • CSR reporting and audits; • Procurement reporting; • managing restructurings, reorganisations, acquisitions and spin-offs; • managing membership of joint internal programmes. 	<p>Necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in pursuing their corporate objectives.</p> <p>Necessary to comply with a legal obligation.</p>
<p>Organising internal or external staff training.</p>	<p>Necessary for the performance of the contract to which the Employee is party.</p> <p>Necessary for the purposes of the legitimate interests pursued by AccorInvest Entities and/or the Employee.</p> <p>Necessary to comply with a legal obligation.</p>
<p>Creation of documents (especially legal) that the AccorInvest Entities require to operate their businesses such as activity reports.</p>	<p>Necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in pursuing their corporate objectives.</p> <p>Necessary to comply with a legal obligation.</p>
<p>Sharing of Employee data in the context of a merger or sale of an AccorInvest Entity or business.</p>	<p>Necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in pursuing their corporate objectives.</p>

V. Data retention

The Personal Data Processed is retained by the AccorInvest Entity in accordance with the retention obligations stipulated by applicable legal and regulatory provisions.

When the Processing is necessary for the performance of a contract to which the Employee is party, the retention period is equal to the term of the contract plus the limitation period applicable to contractual matters.

In the absence of legal and regulatory provisions or contract, the Personal Data may be retained for the period necessary for the purposes for which it was Processed.

We may further retain the Personal Data for legal purposes and to protect AccorInvest's rights and interests until the end of the retention period as prescribed by applicable laws.

After the retention period the Personal Data will either be destroyed or anonymised. The anonymisation of the Personal Data means that it can no longer be associated with the Employees.

Should you need any further information, please contact us at the email address in the Appendix "Data Protection Officer contact e-mail addresses" with regard to your region.

VI. Data recipients and transfers

AccorInvest may transfer Personal Data internally or externally to Recipients if this is necessary to achieve the purposes specified in **Section IV**.

The Personal Data is shared with AccorInvest's personnel authorised to receive it, and may also be transferred to external Recipients such as:

- suppliers that need the Personal Data to provide services to AccorInvest (e.g., IT service providers, payroll providers, pension administration, benefits provision and administration, recruiters, training companies, hotel managers and the administrators, nominees, registrars and trustees of any share plan operated by an AccorInvest Entity);
- partners using the data to conduct analyses or surveys (e.g. hotel managers in connection with a remuneration scheme or CSR reporting, third-party organisations conducting remuneration surveys);
- government and judicial authorities, if required by law or in connection with a criminal investigation or proceedings and in accordance with local regulations;
- external advisers (such as lawyers) to assert AccorInvest's rights and defend itself in legal proceedings;
- hotel's purchaser and third-party companies involved in assets transactions involving the Group's assets (e.g., law firm, notary).

AccorInvest takes appropriate steps to ensure that Personal Data is protected when sharing it with staff or third-party Recipients. In all cases, the transferred data is limited to what is strictly necessary for the purposes for which it is being transferred.

Please note that, AccorInvest Entities are located throughout the world. As a result, your Personal Data may be transferred to another AccorInvest Entities outside the country where you are located in particular due to the organisation of the management of the AccorInvest Group which involves such transfers of Personal Data. Such transfers may evolve from time to time in accordance with the evolution of the management organisation. Details about such data transfers can be obtained by contacting the relevant country's data protection e-mail address as specified in the **Appendix 1**.

The aforementioned transfers include transfers to foreign countries where the law does not provide sufficient protection for personal data according to the local regulation. To ensure the lawfulness of data transfers, AccorInvest Entities will ensure that appropriate safeguards are implemented to manage such transfers (for example through standard contractual clauses).

VII. Rights of Employees

As data subjects, Employees are entitled to exercise the rights set out in Applicable DP Legislation.

Applicable DP Legislation provides that data subjects have, subject to certain conditions and limits, a right of access, to rectify and erase their Personal Data collected by an AccorInvest Entity. Data subjects also have the right to data portability, to request its restriction or to object to the Processing of their Personal Data. In the limited circumstances where you may have provided your consent to the collection, Processing and transfer of your Personal Data for a specific purpose, you have the right to withdraw your consent for that specific Processing at any time. You also have the right to ask the local DPO (if such local DPO has been appointed) for a copy of the legal tool we rely on to manage transfers.

When you exercise your right by using one of the email addresses listed in the Appendix 1, please note that you contact the local DPO.

On the other hand, when you use the Group data privacy email address, hereafter mentioned, please note that you contact our Group DPO.

These rights can be exercised by sending either:

1. An email to one of the following:
 - (i) the relevant country's data protection e-mail address as specified in the Appendix 1 to this Employee Privacy Policy;
 - (ii) any other e-mail address indicated by the AccorInvest Entity that collected the Personal Data; or
 - (iii) group.dataprivacy@accorinvest.com;
2. A letter marked for the attention of the Legal department to either:
 - (i) the registered office address of the AccorInvest Entity that collected the Personal Data; or
 - (ii) AccorInvest Group SA
26A, boulevard Royal
L- 2449 Luxembourg, Grand Duchy of Luxembourg.

To protect the Personal Data of the data subject exercising their rights AccorInvest will need to identify the data subject before responding to the request. If there are reasonable doubts about their identity, the data subject may be asked to provide a copy of an official identity document, such as an identity card or passport, to support his or her request.

The data subjects are entitled to file a complaint with the local Supervisory Authority.

In accordance with Article 27 of GDPR and the Article 27 of the UK GDPR:

- The UK AccorInvest Entities specified in **Appendix 2a** have appointed the European Economic Area (“EEA”) entity specified in **Appendix 2a** as their GDPR representative, the latter being authorised to act on their behalf regarding their GDPR compliance when processing data of individuals in the EEA, and to deal with supervisory authorities or data subjects in this respect.
- The AccorInvest Entities located in the EEA specified in **Appendix 2b** have appointed the UK entities specified in **Appendix 2b** as their UK GDPR representative, the latter being authorised to act on their behalf regarding their UK GDPR compliance when processing data of individuals in the UK, and to deal with supervisory authorities or data subjects in this respect.

VIII. Glossary

AccorInvest (or Group): refers to all AccorInvest Entities.

AccorInvest Entity: refers to all the legal entities of the AccorInvest Group, i.e., companies controlled directly or indirectly by AccorInvest Group SA.

Data Controller: the person who, alone or jointly with others, determines the purposes and means of Processing Personal Data.

Employee Privacy Policy: the present document together with the Appendices, that provides the general knowledge and understanding of the Processing of the Employees' Personal Data by AccorInvest.

Personal Data: any information relating to an identified or identifiable individual. An individual who can be identified, directly or indirectly, including by reference to an identifier, such as a name, identification number, location data, online or to one or more specific elements specific to one's physical, physiological, genetic, psychological, economic, cultural or social identity is deemed to be an identifiable individual.

Processing: any operation or set of operations performed or not in an automated manner and applied to data or data sets such as collection, recording, organisation, structuring, retention, adaptation or modification, extraction, consultation, use, communication by transmission, circulation or any other form of dissemination, reconciliation or interconnection, limitation, erasure or destruction.

Recipient: whether a third party or not any individual or legal entity, public authority, department or any other organisation to which Personal Data is disclosed.

We reserve the right to update this **Employee Privacy Policy** at any time, and we will provide you with a new Employee Privacy Policy when we make any substantial updates. We may also notify you in other ways from time to time about the Processing of your Personal Data.

**APPENDIX 1
DATA PRIVACY CONTACT E-MAIL ADDRESSES**

- **France, Luxembourg & Monaco:** donnees.personnelles@accorinvest.com
- **UK:** gdpr_uk@accorinvest.com
- **Belgium, Netherlands, Luxembourg** (except head office): gdpr_benelux@accorinvest.com
- **Germany, Austria:** datenschutz@accorinvest.com
- **Portugal :** accorinvest.pt.protecao.dados@accorinvest.com
- **Spain:** accorinvest.sp.proteccion-datos@accorinvest.com
- **Poland:** pl.gdpr@accorinvest.com
- **Italy and Greece:** dataprivacyita@accorinvest.com
- **Czech Republic:** cz.gdpr@accorinvest.com
- **Slovakia:** sk.gdpr@accorinvest.com
- **Hungary:** hu.gdpr@accorinvest.com
- **Romania:** ro.gdpr@accorinvest.com
- **Lithuania:** lt.gdpr@accorinvest.com
- **Switzerland :** gdpr-switzerland@accorinvest.com

APPENDIX 2 GDPR and UK GDPR'S REPRESENTATIVES

2a – GDPR's representatives

The following UK AccorInvest Entities :

- 1) Accor UK Business & Leisure Hotels Limited (registered in England and Wales with company number 01016187)
- 2) Accor UK Economy Hotels Limited (registered in England and Wales with company number 01244907)

have appointed as GDPR representative the following EEA entity:
AccorInvest Group SA, registered under the laws of Luxembourg with company number 100771, located 26A boulevard Royal – 2449 Luxembourg – Grand-Duchy of Luxembourg.

2b – UK GDPR's representatives

All AccorInvest Entities located in the EEA which operate hotels activities have appointed as UK GDPR representative the following UK entity:
Accor UK Business & Leisure Hotels Limited, registered under the laws of England and Wales with company number 01016187, located 10 Hammersmith Grove – London W6 7 AP – United Kingdom.