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## DATA PROTECTION & PRIVACY NOTICE

By reading this Data Protection and Privacy Notice (“Notice”) and voluntarily submitting a report to the Amex Ethics Hotline, you accept the terms contained herein. If you do not agree with these terms below, please note that we are unable to accept any information through this system and suggest you report this matter directly to your leader, or to a representative in Human Resources, Internal Audit, General Counsel’s Organization or Compliance, depending on the nature of the issue or concern.

### 1. General

The Amex Ethics Hotline is a web and phone-based intake system provided by American Express, 200 Vesey Street, New York, New York 10285 (“Amex”) to its employees, contractors, former employees, vendors, and suppliers (“Reporters”) for reporting compliance and ethical issues or concerns related to our Code of Conduct, relevant laws and regulations, or company policies.

The Amex Ethics Hotline and the database in which the personal data and information that you may report is stored, are operated by NAVEX Global, Inc. in the United States.

You may contact Amex with any questions relating to this Notice or the Amex Ethics Hotline by contacting the Amex Ethics Office.

### 2. Use of the Amex Ethics Hotline

Use of the Amex Ethics Hotline is voluntary. You are encouraged to report concerns and issues directly to your leader, or to a representative in Human Resources, Internal Audit, General Counsel’s Organization, or Compliance, depending on the nature of your concern or issue. If you are uncomfortable reporting your concerns to any of these people (or you are not an employee or contractor), you may use the Amex Ethics Hotline to make your report.

The Amex Ethics Hotline is a confidential phone and online reporting system that allows you to report compliance and ethical issues or concerns to Amex. Some countries may limit the topics of reports we are able to accept through the Amex Ethics Hotline. Also, in some countries, anonymous reports may not be permitted under the law except under extremely restrictive circumstances.

Any issues or concerns relating to topics not permitted by law to be reported via the Amex Ethics Hotline should be reported directly to your leader or a representative in Human Resources, Internal Audit, General Counsel’s Organization or Compliance as appropriate for the subject matter of the concern or issue.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company’s operations may result in decisions that affect others. Therefore, we ask that you only provide information that you believe is true. You will not be subject to legal actions from Amex for reporting a concern or issue that is made in good faith, even if it later turns out to be factually incorrect. Please be aware that knowingly providing false or misleading information will not be tolerated. The information



you submit will be treated confidentially, except in cases where this is not possible because of legal requirements or in order to conduct an investigation, in which case the information will be handled sensitively. We encourage you to identify yourself in order for us to follow up with questions we may have.

### **3. What personal data and information is collected and processed?**

The Amex Ethics Hotline captures the following personal data and information that you provide when you make a report: (i) your name and contact details (unless you report anonymously) and your relationship to Amex; (ii) the name and other personal data of the persons you name in your report if you provide such information (*i.e.*, description of functions and contact details); and (iii) a description of the concern or issue as well as a description of the circumstances of the incident. Note that depending upon the laws of the country in which you are residing, the report may not be made anonymously; however, your personal information will be treated confidentially and will only be disclosed as set out below.

### **4. How will the personal data and information be processed after your report and who may access personal data and information?**

The personal data and information you provide will be directly stored in a database which is located on servers hosted and operated by NAVEX Global, Inc. in the United States. NAVEX Global has entered into contractual commitments with Amex to secure the information you provide in accordance with applicable law, including taking appropriate steps to ensure the same level of protection set forth by EU privacy legislations.

For the purpose of processing and investigating your report and subject to the provisions of local law, the personal data and information you provide may be accessed, processed and used by the relevant personnel of Amex, including the Amex Ethics Office, Employee Relations, Internal Audit, Global Security, General Counsel's Organization, Compliance, management, external advisors (*e.g.*, legal advisors), or, in limited circumstances, by technical staff at NAVEX Global, Inc.

Personal data and information you provide may also be disclosed to the police and/or other enforcement or regulatory authorities. The relevant bodies that receive and process personal data can be located in the U.S. or in another country that may not provide the level of data protection available in the European Union.

The personal data you provide will be kept as long as necessary to process your report, or, if applicable, as long as necessary to initiate resolution of the matter or to meet our legal or financial needs.

### **5. Accessing information concerning the report**

Amex will promptly notify any person who is the subject of a report, where required by law, except where notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information.

With some exceptions, the subject of the report may access information concerning the report (with the exception of the identity of the Reporter) and request correction of personal data that is inaccurate or incomplete in accordance with applicable law. To make any such corrections, please contact the Amex Ethics Office.