



# AMERICAN EXPRESS SAUDI ARABIA EMPLOYEE PRIVACY STATEMENT

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American Express is regulated and supervised by the Saudi Central Bank.

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## Definitions & Abbreviations

TERM	DEFINITION
AESA	American Express Saudi Arabia
Career Information	Includes data, resources, and guidance provided to employees to support their career development and advancement within the organization. It includes information about available job opportunities, career paths, skill requirements, training programs, promotional opportunities, and other factors relevant to making informed decisions about one's career trajectory.
CEO	Chief Executive Officer
Contact Information	Includes postal address and copies of documents showing proof of postal address, phone number (personal and work), mobile phone number (personal and work), email address (personal and work), and any address changes.
Credit Data	Any Personal Data related to an individual's request for, or obtaining of, financing from a financing entity, whether for a personal or family purpose, including any data relating to that individual's ability to obtain and repay debts, and the credit history of that person.
CRO	Chief Risk Officer
Criminal Check Information	Includes information relating to criminal history
Data Controller	Any public entity, natural person or private legal person that specifies the purpose and manner of Processing Personal Data, whether the data is processed by that Controller or by the Processor.
Data Processors	Any public entity, natural person or private legal person that processes Personal Data for the benefit and on behalf of the Controller.
Data Subject	The individual to whom the Personal Data relates
DPO	Data Protection Officer
Emergency Contact Information	Includes name, emergency contacts, relationship, contact Information of that individual and dependent names.
GOSI	General Organization for Social Insurance
Identity Information	Includes your name (including first name, middle name(s), and surname or family name), any other names (including maiden names), preferred name, title, date of birth, age, and gender and marital status

Job Information	Includes start date, job title or role, job description, job location, employment status, employment type, promotion and transfer history, hours of work, contract terms, overtime eligibility, manager changes, employee ID or number, organizational chart, grade, working pattern and reporting line or manager information.
Leave Information	Includes annual leave dates taken, unpaid leave dates taken, details and dates of all other types of leave taken.
Medical Information	Includes dates of absence, reason for absence, medical information or reports, fit note information, diagnosis information, prognosis information, pre-employment medical assessment and details of accommodations and adjustments.
Nationality Information	Includes nationality, place of birth (town / country), language spoken, passport information, VISA details (including expiry date), and copies of ID documents.
Payroll Information	Includes social contributions, pay history, bank details, overtime payments, deductions amount, holiday pay to be paid, termination payments to be made, and any other information relating to your pay.
PDPL	Personal Data Protection Law
Performance Information	Includes feedback collected to evaluate an individual or team's performance against established goals, standards, or expectations within an organization. This information may include quantitative metrics such as sales figures, productivity rates, and customer satisfaction scores, as well as qualitative assessments from performance reviews, peer evaluations, and manager feedback.
Personal Data	Any data, regardless of its source or form, that may lead to identifying an individual specifically, or that may directly or indirectly make it possible to identify an individual, including name, personal identification number, addresses, contact numbers, license numbers, records, personal assets, bank and credit card numbers, photos and videos of an individual, and any other data of personal nature.
Processing/Process	Any operation carried out on Personal Data by any means, whether manual or automated, including collecting, recording, saving, indexing, organizing, formatting, storing, modifying, updating, consolidating, retrieving, using, disclosing, transmitting, publishing, sharing, linking, blocking, erasing and destroying data.
Recruitment Information	Includes the source of your application, work experience, resume details, employment history, education history, salary expectations, LinkedIn information, preferred employment type, referee information and contact details, former contract information (such as post-termination restrictions, notice period, salary, and

	benefits), and any information created during the recruitment exercise (such as management opinion and assessment).
Regulatory Information	Includes regulation status, regulatory complaints, regulatory history, regulatory record, and regulatory references.
Remuneration Information	Includes salary, benefits information, bonus details, salary allowances, benefit value, policy numbers, and level of cover, notice dates and salary increases.
SAMA	Saudi Central Bank
Sensitive Data	Personal Data revealing racial or ethnic origin, or religious, intellectual or political belief, data relating to security criminal convictions and offenses, biometric or genetic Data for the purpose of identifying the person, health data, and data that indicates that one or both of the individual's parents are unknown.
Skills Information	Includes qualifications, skills information and languages spoken.
Talent Bank	Includes potential employees whose skills and experience may be a fit for any future vacancies.
Talent Management Information	Encompasses activities such as recruitment, training, performance management, succession planning, and employee development to ensure that the organization has the right people in the right roles at the right time.
Termination Information	Includes resignation or dismissal letters, notice dates, termination date, leave date, reason for leaving, meeting notes, termination payments and entitlements, exit interview notes, any colleague feedback and management opinion.
Terms & Conditions	The terms that apply to the relationship, and the conditions that must be met by both parties
Training Information	Includes data and resources related to the planning, delivery, and evaluation of training programs within an organization. This may include details about training courses, workshops, seminars, and other learning opportunities available to employees, as well as information about training schedules, instructors, materials, assessments, and feedback mechanisms to measure the effectiveness of training initiatives
Vetting Information	Includes data to verify facts, to ensure that a resume, for example, accurately describes all the skills, awards, and experience a job candidate claims on their resume.



# Employee Privacy Statement

## 1. Introduction

American Express Saudi Arabia (AESA) is committed to conducting its business in accordance with all applicable Data Protection Laws, regulations and in line with the highest standards of ethical conduct.

This Privacy Statement is issued by AESA. When we mention “AESA”, “we”, “us” or “our” we are referring to American Express Saudi Arabia who processes your Personal Data and those third parties who do so on our behalf. AESA will be the Data Controller of your Personal Data.

The information in this Privacy Statement is important, so we have tried to make it very easy to navigate.

It is important to read this Privacy Statement together with any separate privacy or fair processing notices that we may provide when collecting Personal Data from you. Any such notices are important. They will give more information about how we, and any third party, will use the particular Personal Data collected, your rights and in some cases details of any other provisions that may apply to the processing of that Personal Data.

We may seek your consent to certain processing. If consent is required for the processing in question, it will be sought from you separately (whether within a fair processing notice or otherwise) directly by us or a third party appointed to do so on our behalf. This helps us to ensure that it is freely given, informed and explicit.

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If the way that Personal Data will be managed differs from this Privacy Statement or is incompatible with the original purpose the data was collected for, additional information regarding this processing will be provided to you.

## 2. Scope

This Privacy Statement explains how we collect and use Personal Data for:

- i. Applicants and candidates
- ii. All current colleagues including all workers, board members, contractors, trainees, agency workers, consultants, regulatory and non-regulatory auditors, directors and third parties whose information is provided to us in connection with one of these relationships (e.g., next-of-kin, emergency contact information and dependents)
- iii. All former colleagues

Please note that we may process your Personal Data without your knowledge or consent, in compliance with this Privacy Statement, where this is required or permitted by applicable law.

If you have any questions about how your Personal Data is managed, please refer to the further details provided in this Privacy Statement.

If you continue to have questions, you can use the contact details provided to ask these to us directly.

### 3. General Information

This section is about how your Personal Data is processed, we have set out some information regarding how we manage your Personal Data below, in the form of Frequently Asked Questions.

If you have a question which is not answered in the text below, please refer to the “[Queries or Complaints](#)” section provided herein to ask us directly.

#### 3.1 What is the basis on which you justify processing my Personal Data?

To carry out any processing of your Personal Data, we need to ensure that we have a particular reason to do so. We have set out the reasons we have for processing your Personal Data in this Privacy Statement.

These reasons can be grouped into one or more general grounds for processing, which directly relate to the grounds for processing set out in the PDPL. We have also identified these general grounds within this Privacy Statement.

Please contact us to receive more information regarding the lawful basis for processing or our legitimate interests, if you have any questions at all or would like more detail than is set out in this Privacy Statement.

The general grounds and what they mean are described further below:

1. The processing is needed for a **contract** with you

We can process your Personal Data where the processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering such a contract or agreement.

This means that we can carry out the actions needed to conclude or execute our contract with you. For example, we need some information from you to be able to pay you and provide you with any contractual benefits.

2. The processing is needed so that we can comply with our **legal obligations**.

We can process your Personal Data where processing is necessary for compliance with a legal obligation to which we are subject.

Therefore, we can carry out any actions we need to take in order to comply with laws. This could include complying with the Labor Law, or any other regulations we are bound to implement.

3. The processing is needed for our **legitimate interests**.

We can process your Personal Data where the processing is necessary for our legitimate interests, provided that those interests are not overridden by your interests or your rights in your own Personal Data and that no Sensitive Data is to be processed.

We can carry out any actions we consider are needed for these interests, as long as we consider that the processing in question does not negatively infringe on your privacy rights and interests.

## **3.2 What are Sensitive Categories of Personal Data?**

Sensitive Data means Personal Data revealing your racial or ethnic origin, or religious, intellectual or political belief, data relating to security criminal convictions and offenses, biometric or genetic data for the purpose of identifying the person, health data, and data that indicates that one or both of the individual's parents are unknown.

### **3.2.1 What is the basis on which you justify processing my Sensitive Data?**

In order to carry out any processing of your Sensitive Data, we rely on your explicit consent as required by law. In addition to this, the processing may be necessary for the purposes of carrying out the obligations and exercising the rights of you or us in the field of employment law.

This means that we can carry out any actions we need to undertake in order to comply with our obligations under employment and other applicable laws. This could include managing you in accordance with Labor Law, or other applicable law or complying with any reporting requirements.

## **3.3 What if I do not provide you with my Personal Data?**

In some cases, you will be free to withhold Personal Data from us, however if you do withhold specific information, we may not be able to continue with your relationship with us if we believe we require the relevant information to support the effective and efficient administration and management of our relationship. For example, we require your Identity Information, Contact Information and Payroll Information to pay you. If this is not provided, we may be unable to manage our contractual relationship.

## **3.4 How does AESA keep my Information Secure?**

We are committed to protecting the confidentiality and security of the information provided to us and have invested in robust technical, physical, and organizational security controls to protect information against unauthorized access, damage, disclosure, or loss.

To build a robust and compliant information security framework, AESA has adopted ISO/IEC 27001:2022, SAMA Cybersecurity Framework, National Cybersecurity Authority and PCI DSS 4.0.1 frameworks the ("Frameworks".) These Frameworks serve as a foundation for identifying, assessing and mitigating information security risks guaranteeing comprehensive protection for all information assets.

If you would like more information about the safeguards we have put in place, please contact us.

## **3.5 Where do we get your Information from?**

In most cases, we receive the Personal Data directly from you. You either provide this to us (or our third party) at recruitment or do so at another time during your employment with us. This will include Personal Data that you input into a form, as well as information that you give to our Human Resources department, Admin department and to your manager.

For example, you provide information directly to us in an application form, resume, or similar document. You will provide this through our Human Resources department, Admin department, hiring managers or third parties. We may create Personal Data about you during your employment and as stated, in some cases, we may obtain some of your Personal Data about you from third party sources.

### **3.5.1 Internal Sources**

In addition to the Personal Data that you provide to us, we may generate some further Personal Data internally. This will usually be generated by your manager and the Human Resources department or Admin department. For example, we will create interview notes during recruitment, and we will also give you regular feedback as part of your development and any performance management processes.



In some circumstances, data may be collected indirectly from monitoring devices or by other means (for example, building and location access control and monitoring systems, CCTV, telephone logs and recordings, and email and Internet access logs), as, and to the extent permitted, by applicable laws. In these circumstances, the data may be collected by us or a third-party provider of the relevant service.

### **3.5.2 External Sources**

Due to the size and complexity of our operations, it is not possible to name each of our sources of Personal Data in this Statement. However, we may obtain some information from third parties, for example, references from a previous employer, credit checks from licensed agencies, medical reports from external professionals, and information from government bodies.

Please contact us if you have any questions regarding the source of your Personal Data or would like more detail than is set out in this Privacy Statement.

## **3.6 When do we share your Information with Others?**

Within AESA, your Personal Data can be accessed by or may be disclosed internally on a need-to-know basis. Your Personal Data may also be accessed by third parties, including suppliers, advisers, national authorities, and government bodies.

Where these third parties act as a data processor (for example, a clinic carrying out a medical test) they carry out their tasks on our behalf and upon our instructions for the purposes set out in this Privacy Statement. In this case, your Personal Data will only be disclosed to these parties to the extent necessary to provide the required services.

In some cases, the external recipient may also be a data controller of your Personal Data. In such a case, a further notice may be provided to you regarding the processing of your Personal Data.

### **3.6.1 Internal Recipients**

Internal recipients of your Personal Data include:

- Human Resources department, including managers and team members;
- Local, and executive management responsible for managing or making decisions in connection with your relationship with AESA or when involved in a Human Resource Function process concerning your relationship with AESA (including, without limitation, Finance, Compliance, Legal, Internal Audit and Cybersecurity).
- System administrators; and
- Where necessary for the performance of specific tasks or system maintenance by colleagues in teams such as Finance and the IT departments

Personal Information may also be shared with certain interconnecting systems such as the Human Resources system and IT systems.

In addition, certain basic Personal Data, such as your name, location, job title, and contact information may also be accessible to other colleagues for the purposes set out in this Privacy Statement. For example, this includes your profile on the Microsoft Outlook address book.

### **3.6.2 External Recipients**

Due to the size and complexity of our operations it is not possible to name each of our external data recipients in this statement.

Examples of third parties with whom your Personal Data may be shared include:

- Our clients or customers,
- Service providers,
- Regulatory authorities such as Saudi Central Bank (SAMA)
- IT administrators,
- Lawyers,
- Auditors,
- Administrators of our benefits programs (where those are outside of AESA).

Personal Data contained in our Human Resources and other interconnecting systems may be accessible by providers of those systems, their associated companies, and sub-contractors (such as those involved with supporting, and maintaining the framework of our Human Resources and Payroll information systems).

We expect these third parties to process any data disclosed to them in accordance with the contractual relationship between them and us and applicable law, including with respect to data confidentiality and security.

In addition, we may share Personal Data with national authorities in order to comply with a legal obligation to which we are subject. For example, this could be due to imminent or pending legal proceedings or a statutory audit.

### **3.7 Cross-Border Data Transfers**

Where necessary, and unless prohibited by applicable law, we may transfer your Personal Data to other countries. Some of these jurisdictions may not provide the same level of protection for Personal Data as provided in the Kingdom of Saudi Arabia. Some countries will have different Data Protection Laws.

If we share your personal information with third parties outside the Kingdom of Saudi Arabia, we ensure that it is done so in a manner compatible with the Personal Data Protection Law.

### **3.8 How long do we Retain Personal Data**

We will retain your Personal Data for as long as is reasonably necessary for the purposes explained in this Privacy Statement. In some circumstances we may retain your Personal Data for longer periods of time, for instance where we are required to do so in accordance with legal and regulatory requirements or if we reasonably believe there is a prospect of litigation relating to your relationship with us.

The length of time for which AESA needs to retain Personal Data is set out in the Data and Records Retention Policy. This considers the legal and contractual requirements that influence the retention periods set forth in the schedule.

We will generally retain your Personal Data only so long as it is required for purposes for which it was collected. This will usually be the period of your employment or other contract with us plus the length of any applicable statutory limitation period following your departure.

### **3.9 How do we manage the collection of Personal Data about other individuals?**

Apart from Personal Data relating to yourself, you may also provide us with Personal Data of third parties. For example, you may provide us with an emergency contact. We may also hold data regarding your dependents for the purpose of visa administration, payment of certain benefits such as schooling and arranging health insurance.

Before you provide information about others to us, you must first inform these individuals that you intend to provide their details to us and of the processing to be carried out.

## **4. Applying for a Role**

When you apply for a role with us, we will process Personal Data to manage and administer your application.

In particular:

### **4.1 Accepting your Application**

We need to know who you are and identify you in order to be able to begin to engage with you regarding your application to us.

We use your Contact Information, your Identity Information, and your Nationality Information in order to assess your identity, process and/or accept your application. We may also provide your data to regulators if the role that you have applied for is regulated. For example, a senior role where certain requirements must be met.

We may add to the information that you provide to us when we undertake our checks of your identity and when we consider your application. Any new Personal Data will be generated internally through our Human Resources department.

If your application is managed by a recruitment agency or other third party who acts on our behalf, this information will be received from that agency or third party.

### **4.2 Communicating with you**

During the application process, we will make and receive communications with you regarding your application.

We will process your Contact Information and your Identity Information to do this. We do this to prepare to enter into a contract with you.

### **4.3 Assessment and Selection**

To assess your suitability for a role, we will collect and process your Personal Data. This assessment includes considering your qualifications, educational history, work experience and skills against those of other candidates and our role specification and requirements.

We will process Identity Information, Recruitment Information and Skills Information for the purposes set out above.

We do this to prepare to enter into a contract with you.

We may add further information to your application as you proceed through the selection process. The activities we undertake could include a review of your application, internal discussions, and an interview with you, and internal feedback. It is likely that further Personal Data will be generated by you, the hiring manager, and Human Resources or Admin department.

#### **4.4 Background Screening**

We may undertake medical, criminal, financial, and sanction checks where this is necessary by regulators and where we need to protect AESA, our customers, and employees.

The Personal Data that we will review for this purpose may include Contact Information, Identity Information, Job Information, Recruitment Information Medical Information, Regulatory Information and Criminal Check Information.

We carry out this processing on the basis of consent and to comply with our legal obligations. Checks must be carried out in line with AESA's internal Policies & Procedures using third parties. This includes:

1. A Criminal background check
2. A financial check
3. A sanction check
4. Medical test via our partner clinic

They may provide us with additional Personal Data relating to you in the form of the results of the checks and any report.

#### **4.5 Eligibility to work**

We need to ensure that all successful candidates are eligible to work in the Kingdom of Saudi Arabia before they commence working for AESA.

The Personal Data that we process for this purpose is Identity Information, Contact Information and Nationality Information.

For expats, if we need to assist you with an employment visa, issuance of Iqama or other applications, we may also require additional information for this purpose such as Emergency Contact Information, Recruitment Information and Skills Information.

We process this Personal Data in order to prepare to enter into a contract with you and to comply with our legal obligations. For example, to comply with Labor Law.

We may process Personal Data which we will receive regarding expat affairs and any associated applications from government agencies, our specialists and the HR or Admin Department.

#### **4.6 Making an Offer / Onboarding**

If we wish to offer you a role with us, we will need to use your Personal Data in order to make an offer to you and generate the appropriate documentation. As stated above, we may need to undertake certain checks due to the level or the accountabilities of the role.

The Personal Data that we may process for this purpose may include your Contact Information, Identity Information, Job Information, Photo ID (ID Badge and display picture), Entitlement Information, Recruitment Information, Remuneration Information, Skills Information, Emergency Contact Information Regulatory Information (as appropriate) and certain Vetting Information.

If you choose to accept the job offer, we will need to process some of the Personal Data and Payroll Information.

We do this to prepare to enter into a contract with you and for complying with our regulatory

obligations.

#### **4.7 Unsuccessful Candidates**

For unsuccessful candidates, we will retain relevant recruitment materials.

The Personal Data that we may process for this purpose may include your Contact Information, resume, and interview notes.

This information will be retained and will be destroyed in line with AESA's Data and Records Retention Policy.

We process this Personal Data on the basis of our legal obligations in the event of any claims and to be able to respond to any regulatory complaints.

#### **4.8 Talent Bank**

You may wish for your data to remain on file should you still be interested in pursuing a career with AESA. If your skills and experience are suitable for any future vacancies, you will be contacted.

The Personal Data that we may process for this purpose may include your Contact Information, resume, and interview notes.

All candidates have the rights to withdraw their data that is being held.

We process Personal Data for this purpose on the basis of consent.

### **5. As a Colleague**

We will collect, use, and share Personal Data about you if you currently work at AESA. To the extent that this Personal Data is not collected from you, it is generated internally through our management and HR or Admin processes.

In particular:

#### **5.1 Managing our Relationship**

We will process your Personal Data to ensure that the terms of your contract with us are administered effectively. This will include answering your queries through our Human Resources or Admin department and managing your employment record through the Human Resources and Payroll Systems and any other management action with respect to your relationship with us.

To do this, we may need to process Contact Information, Career Information, Identity Information, Job Information, Entitlement Information, Leave Information, Nationality Information, Medical Information, Emergency Contact Information, Payroll Information, Performance Information, Recruitment Information, Regulatory Information (if applicable), Remuneration Information, Skills Information, Talent Management Information and Termination Information.

We process this Personal Data because it is necessary for the performance of our contract with you and for compliance with our legal obligations.

Personal Data may be generated by third party suppliers, including those who assist with any background checks.



## **5.2 AESA Employee Benefits and Rewards**

We will process your Personal Data to ensure that you receive the benefits and rewards applicable to your relationship with us.

To do this, we will process Contact Information, Identity Information, Job Information, Entitlement Information, Leave Information, Payroll Information, Remuneration Information, and Termination Information.

We process this Personal Data because it is necessary for the performance of our employment contract with you.

Your Personal Data may be shared with our external benefits providers (where appropriate) who provide benefits as set out in the Human Resources Policy.

## **5.3 Payroll**

We will process your Personal Data to ensure that the terms of your contract are administered effectively, including any terms in relation to your pay and benefits.

To do this, we will process your Contact Information, Identity Information, Job Information, Payroll Information, Entitlement Information, Leave Information, Remuneration Information and Termination Information.

We process this Personal Data because it is necessary for performance of our employment contract with you.

We may receive and share information from third parties in order to manage this processing activity, such as GOSI and your bank.

## **5.4 Managing all types of leave**

We will process your Personal Data so that we can manage all types of leave including your annual leave, bereavement leave, sickness leave and all other types of statutory leave.

To do this, we will process Contact Information, Identity Information, Job Information, Entitlement Information, Leave Information, Performance Information, Emergency Contact Information, Medical Information and Remuneration Information.

We process this Personal Data because it is necessary for the performance of our employment contract with you and to comply with our legal obligations.

Your Medical Information is a Sensitive category of Personal Data. To the extent that your Medical Information is processed, this is done on the basis of carrying out our employment law obligations to you.

## **5.5 Business Reorganization**

We will process Personal Data from time to time about you in order to help us run the business effectively and manage change and transformation programs.

In order to do so, we will process your Identity Information, Job Information and Performance Information.

We may also process Remuneration Information, Skills Information, Talent Management Information and Termination Information.

We will process this Personal Data because it is necessary for the performance of our employment contract with you and to comply with our legal obligations.

Depending on the type of program, we may need to share your Personal Data with third parties as a result of such activities.

## **5.6 Legal and Regulatory Compliance**

We will process Personal Data in order to comply with our legal and regulatory obligations imposed on us by the Ministry of Human Resources and Social Development, SAMA, Finance Academy, GOSI or otherwise.

To do this, we will process Identity Information, Job Information, Entitlement Information, Leave Information, Nationality Information, Payroll Information, Regulatory Information (where applicable), Remuneration Information, Termination Information, Training Information, Vetting Information. We process this Personal Data because it is necessary for compliance with our legal obligations.

We may need to share your Personal Data with regulatory authorities, public authorities, enforcement bodies, legal advisers and other third parties for these purposes.

From time to time we may be asked to provide information about our workforce to our regulators, to law enforcement and other public authorities, or to meet legal disclosure requests as part of a legal process or court order. These requests may cover a range of matters including but not limited to financial conduct, prevention of crime, audits, data protection, and employment.

## **5.7 Business Protection**

We undertake processing activities during your employment which are designed to ensure that our business operations are protected. These activities include monitoring both the behavior and activity of our colleagues and the use of our systems.

To do this, we may process any of the Personal Data held on our systems.

We process this Personal Data because it is necessary for compliance with our legal obligations and on the basis of our legitimate interests in complying with our regulatory obligations, protecting our business, monitoring use of our systems and assets and to manage the activities and behavior of our employees.

In some circumstances, data may be collected indirectly from monitoring devices or by other means (for example, building and location access control and monitoring systems, CCTV, telephone logs and recordings and email and Internet access logs), if and to the extent permitted by applicable laws. In these circumstances, the data may be collected by us or a third-party provider of the relevant service.

## **5.8 Investigations, complaints, disciplinary, grievances and performance management**

As a responsible business, we may need to process your Personal Data for HR matters such as disciplinary and grievance processes, or for the purposes of performance management. Our policy and processes on these matters are outlined in the Human Resources policy.

The Personal Data that we will process for these purposes is Performance Information.

Depending on the circumstances, we may also process other categories of Personal Data, including Contact Information, Identity Information, Job Information, Leave Information, Recruitment Information, Regulatory Information (if applicable), Skills Information, Training Information and Vetting Information.

We process this Personal Data because it is necessary for the performance of our employment contract with you. We also process this Personal Data to ensure compliance with our legal obligations.

We may obtain some of the Personal Data above from other colleagues and contractors during the course of investigations and we may share disciplinary action with the Saudi Central Bank.

### **5.9 Talent Management**

We will process your Personal Data to ensure that we manage talent effectively within our business. To do this, we will process your Career Information, Job Information, Recruitment Information, Skills Information, Performance Information and Talent Management Information.

We will process this Personal Data for our legitimate interest in ensuring that we manage talent effectively.

### **5.10 Training and Development**

We will process your Personal Data to ensure that you receive the training necessary to perform your role and develop generally.

To do this, we will process Contact Information, Identity Information, Job Information and Training Information.

We process this Personal Data for the performance of our employment contract with you and to comply with our legal obligation.

We may share your Personal Data with third party training providers for this purpose and may receive some Personal Data regarding you in return.

### **5.11 Communications**

We will process your Personal Data so that we can communicate with you, including in relation to business updates, changes to ways of working, new products and services and product trials.

To do this, we will process Contact Information, Identity Information and Job Information.

We process this Personal Data because it is necessary for performance of our employment contract with you.

### **5.12 AESA Employee Surveys and other Engagement Communications**

We will process your Personal Data so that we can undertake colleague engagement surveys, and any other engagement communications.

To do this, we will process Contact Information, Identity Information, Job Information and Performance Information which we may obtain from data held within our internal Human Resources systems.

We will also gather additional information from you during these surveys although you will have the option of deciding whether to provide such additional data at the time of the survey. Responding to these surveys will be completely voluntary.

Both the Personal Data used to undertake the surveys and the Personal Data gathered and used during the surveys are processed because it is necessary for our legitimate interests to improve communications, review colleague relationships, assess engagement and satisfaction levels and make improvements to our ways of working or for any other purpose which is communicated to you at the time of the survey.

We may share your Personal Data with a third party to carry out surveys on our behalf.

### **5.13 Managing departure and off boarding**

Upon termination of your employment, we process your Personal Data in order to manage your departure from our employment.

To do this, we will process Contact Information, Identity Information, Job Information and Termination Information.

We process this Personal Data because it is necessary for performance of our employment contract with you and to comply with our legal obligations.

### **5.14 Exit Interviews**

On termination of your employment, we may process your Personal Data as part of our exit interview process, in order to understand your reasons for leaving and whether we can improve our operations. To do this, we will process Contact Information, Identity Information, Job Information, Performance Information and Termination Information.

We process this Personal Data for our legitimate interests in ensuring an effective business operation.

### **5.15 Medical Insurance and other types of insurance**

We will process your Personal Data for the purposes of managing your enrolment and entitlement under these schemes.

To do this, we will need to process Contact Information, Identity Information, Job Information, Entitlement Information, Leave Information, next-of-kin Information, Emergency Contact Information Payroll Information, Remuneration Information and Termination Information.

We process this Personal Data because it is necessary for performance of our contract with you and our legal obligation.

## **6. After our relationship ends**

We continue to process some Personal Data about you after our relationship with you comes to an end.

In particular:

### **6.1 Maintaining Records**

We will process your Personal Data in order to maintain certain records following the termination of your relationship with us.

To do this, we will process Contact Information, Identity Information Payroll Information and Nationality Information.

We process this Personal Data to ensure compliance with our legal obligations and for our legitimate interests in maintaining records for our business and defending legal claims.

## 6.2 References

We will process your Personal Data following the termination of your relationship with us so that we can respond to any reference requests and in order to respond to any legal assertions or claims made against or by you.

This includes (but is not limited to) providing regulatory references and maintaining a record to allow us to do so.

To do this, we will process Contact Information, Identity Information, Job Information, Leave Information, Payroll Information, Performance Information, Recruitment Information, and Regulatory Information (If applicable), Remuneration Information, Skills Information, Termination Information. We process this Personal Data for our legitimate interests in protecting and defending our business against any legal assertions or claims and, if applicable, for compliance with our regulatory obligations to provide a reference.

Personal Data may be generated by third party suppliers who assist with background checks.

## 7. Your rights

Under the PDPL, you have the following rights in respect of your Personal Data:

- You have the right to be informed in regards to how AESA handles your Personal Data
- You have the right to request access to your Personal Data held by AESA
- You have the right to request correction, completion, or update to your Personal Data held by AESA
- You have the right to request destruction of your Personal Data in certain cases
- You have the right to withdraw consent, if consent was the sole lawful grounds relied upon for processing

Any requests to exercise these rights should be directed to the Data Privacy Team. Please see "[Queries or Complaints](#)" for more information.

The Data Subject Rights Procedure shall define AESA's management and response to Data Subject Rights Requests.

## 8. Queries or Complaints

If you have questions about this Employee Privacy Statement, wish to make a complaint or exercise your rights, please contact our Data Protection Officer at [DataProtection@americanexpress.com.sa](mailto:DataProtection@americanexpress.com.sa). You may also write to: American Express Saudi Arabia, Data Protection Officer, P.O Box 6624, Riyadh, 11452, Saudi Arabia.