



Amex Ethics Hotline Privacy Notice

Effective Date: May 2024

1. Scope and Overview

American Express (we, our, us, Amex) is committed to maintaining an ethical work environment and encouraging you to report compliance and ethical concerns or issues related to our [Code of Conduct](#), relevant laws and regulations, or company policies through a dedicated and confidential ethics hotline and online reporting system, while also protecting the privacy and security of your personal data. This Ethics Hotline Privacy Notice ("**Notice**") applies to the personal data that we collect and process for the purposes of administering our hotline and its related program and investigation reports ("**Ethics Hotline**").

This Notice describes:

- How Amex and any affiliate, subsidiary, and any other company owned or controlled by us collect, use, process, transfer and disclose your personal data about you for the purposes of administering our Ethics Hotline.
- Who can report and the scope of the reporting.

This Notice applies to employees, contractors/contingent workers ("**contractors**"), former employees, vendors, suppliers, customers, and any other individual who contacts the Ethics Hotline to make a report ("**Reporters**"). This Notice supplements Amex's broader Employee Privacy Notice and Contingent Worker Notice, which apply to Amex's collection of personal data outside of the Ethics Hotline context. For more information regarding the entity responsible for the processing of your personal data and how we process your personal data other than through the Ethics Hotline, please consult our other relevant privacy notices. For example:

- For employees, contractors, etc., our Employee Privacy Notice or Contingent Worker Notice, available on our internal platform.
- For others, our Online Privacy Statement, or your Card Member Privacy Statement, available on our website.

2. Use of the Ethics Hotline

The Ethics Hotline and the database which stores the personal data and information you report, is operated by our third-party data processor, NAVEX Global Inc and its affiliates ("**NAVEX**"). NAVEX may also collect, use, process, transfer and disclose your personal data as necessary to operate our Ethics Hotline. Please refer to NAVEX's [privacy notice](#) for more information on NAVEX's practices. You are encouraged to report concerns and issues directly to your leader, or to a representative in Colleague and Labor Relations, 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 groups (or if you are not an employee or contractor), you may use the Ethics Hotline to make your report. you are not an employee or contractor), you may use the Ethics Hotline to make your report.

Use of the Ethics Hotline is voluntary. It 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 Ethics Hotline.



Any issues or concerns relating to topics not permitted by law to be reported via the Ethics Hotline should be reported directly to your leader or a representative in Colleague and Labor Relations, 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. Collection of Personal Data

Personal data is any information relating to you, an identified or identifiable natural person. Personal data excludes anonymous or de-identified data that is not associated with, or linkable to, a particular individual. We may collect the following personal data and information about you when a report is made via the Ethics Hotline, all of which is optional to provide:

- Information to identify you, such as your name and contact details (unless you report anonymously) and your relationship to Amex, including Business Unit / Staff Group.
- 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).
- A description of the concern or issue as well as a description of the data, location, duration and circumstances of the incident.

Your personal data will be treated confidentially and will only be shared as set out in section 5 (Personal Data Sharing) below.

Our Ethics Hotline is not intended to collect or process sensitive personal data (otherwise known as "special categories" of personal data), for example, information about an individual's race, ethnic origin, sexual orientation, health, trade union membership, criminal charges, or convictions. Depending on the country where you are located, additional categories of personal data may be treated as sensitive. Please do not submit any sensitive personal data via our Ethics Hotline unless this is relevant to your report. To the extent we receive sensitive personal data through the Ethics Hotline, we will only process it in accordance with applicable laws and this Notice for the purpose of investigating reports.

4. Use of Personal Data

We only process personal data collected through our Ethics Hotline as necessary for the administration of the ethics and compliance program, to comply with legal obligations, and to pursue our legitimate interests in investigating claims or allegations and potential misconduct. Please note that we consider and balance any potential impact on you and your rights before processing your personal data for our legitimate interest.

To the extent sensitive personal data is submitted via the Ethics Hotline, we will process this data for the purpose of administering our ethics and compliance program and investigating potential misconduct when the processing is necessary:

- For carrying out our legal obligations and protecting our rights under applicable laws.



- To protect an employee's or another person's vital interests.
- To establish, exercise or defend legal claims.
- For reasons of substantial public interest.

We will only process your personal data for the purposes for which we collected it unless applicable law permits or requires us to process your personal data for different purposes. If we need to process your personal data for purposes not identified above, we will do so only after providing you with notice, and if required by law, obtaining your consent.

We sometimes process personal data so that it no longer identifies any individual. Once processed in this manner it will no longer constitute personal data and will be aggregated and anonymized information. Aggregated and anonymized information helps us to analyze patterns, create insight and reports to help us manage and improve our business.

5. Personal Data Sharing

We only share your personal data with others where it is lawful for us to do so, and for a specific purpose as set out above, including with:

- Relevant personnel of Amex, including the Amex Ethics Office, Colleague and Labor 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 to investigate the allegation presented in the report or as required or permitted by applicable laws.
- Police, regulatory authorities, governmental agencies, or courts to comply with legal orders and/or legal or regulatory requirements as required.

6. International Transfers

The personal data and information you provide will be stored on NAVEX servers located in the United States and may be onward transferred to NAVEX sub-processors located outside the United States for service support and translation purposes. NAVEX has entered into appropriate contractual commitments with Amex to secure the information you provide in accordance with applicable law. NAVEX is committed to maintaining compliance with applicable data protection requirements and adheres to stringent privacy and security practices. Personal data may also be transferred to Amex servers in the United States and other countries for the purposes outlined in section 4 (Use of Personal Data) and to the extent allowed by law or regulation, subject to appropriate safeguards.

In relation to transfers of employees' personal data from UK or European Economic Area ("EEA"), Amex conforms to the Binding Corporate Rules ("BCRs"). Our BCRs have been approved by the UK and European data protection authorities. Please refer to Amex's BCRs which are available on our website for information on how we may transfer personal data in compliance with UK and EU law. In relation to transfers of personal data outside the UK or EEA of UK and/or EEA individuals who are not employees of Amex, Amex has in place appropriate safeguards, such as standard contractual clauses.

7. Security and Retention of Personal Data

7.1 Data Security

We have implemented appropriate physical, technical, and organizational security measures designed to secure the personal data collected in connection with the Ethics Hotline against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit personal data access to those



employees, agents, contractors and other third parties that have a legitimate business need for such access.

7.2 Data Retention

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of administering our ethics and compliance program and investigating potential misconduct.

To determine the appropriate retention period for personal data, we consider our legal retention obligations, the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes we process your personal data for, and whether we can achieve those purposes through other means. Applicable laws permit us to retain records of misconduct or allegations and complaints for certain purposes, such as:

- Compliance with a legal obligation to retain personal data for a defined period.
- Preserving potential evidence if the matter results in a criminal, civil, or regulatory action.
- To establish, exercise, or defend legal claims.

When your personal data is no longer necessary for these purposes, we will take reasonable steps to securely destroy such information or permanently de-identify it. For more information about our data retention practices, you can request additional information through the channels identified below.

8. Your Rights

Under some circumstances, you have the right to request access, correction, or erasure of your personal data or to object to the processing or receive a copy of personal data held through this Ethics Hotline. Please note, depending on the country where you are located, some of these rights may not apply.

Please keep in mind that in some circumstances your rights are not absolute and applicable law may allow or require us to deny your request, or we have destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices. If we cannot respond to your request, we will inform you of the reasons why, subject to any legal or regulatory restrictions. For example, we may deny your request to protect the confidentiality and integrity of an investigation.

To exercise your rights or if you have any questions about how we process your personal data, please contact us using the contact details in this Notice. Individuals in the UK and EEA can also complain to the relevant data protection authorities in the UK or EEA member state where they live or work or where the alleged infringement of data protection law occurred.

9. Questions or Complaints

If you have questions about this Notice, how your personal data is handled or wish to make a complaint or exercise your rights, please, contact the Amex Ethics Office at AmexEthicsOffice@aexp.com. You may also write to our Data Protection Officer or person in charge of the protection of personal data; their contact details can be found on www.americanexpress.com or alternatively contact us, and we can share their details with you.

10. Changes to this Notice

We may change this Notice from time to time. When we make changes, we will update the “**Effective Date**” at the top of this page. Any changes to this Notice will become effective when posted.