

THE PRIVACY POLICY

VERSION OF: JULY 2018

1. ABOUT US

- 1.1. This Privacy Policy explains the manner in which we, Edenred Romania S.R.L., having its registered headquarters in Bucharest, 133 Calea Serban Voda, District 4, and TIN RO10696741, registered with the Trade Register under no. J40/5659/1998 (hereinafter referred to as "**Edenred**" or "**We/Us**"), process the personal data. At the same time, in order to issue cards for the electronically issued tickets and in order to issue the electronic currency, Edenred is collaborating with Prepay Technologies Ltd (hereinafter referred to as "**PPS**"), a company registered in England and Wales under no. 04008033, having its registered headquarters in London, 6th floor, 3 Sheldon Square, Paddington, W2 6HY, Great Britain, registered with the Financial Supervisory Authority (FSA) of Great Britain, acting in its capacity as personal data operator for the performed processing activities.
- 1.2. We kindly ask you to carefully read this privacy policy in order to be adequately informed about the manner in which WE and PPS, in our capacity as personal data operators, process your data and observe the rights that you have in your capacity as data subject.

2. WHAT INFORMATION DO WE COLLECT ABOUT YOU?

- 2.1. **If you are a beneficiary of the paper-based tickets issued by Edenred**, regardless of their type, we will process your personal data required by the legislation in force in order to issue the tickets, respectively the name, surname, personal identification number collected from your employer, information regarding the Trading Partners where you used the tickets. Optionally, for better communication, you can also provide us with your email and postal address or your phone number. We will also process any other personal data that you will provide directly (by correspondence, in writing or by phone).
- 2.2. **If you are a beneficiary of the electronic tickets issued by Edenred**, regardless of their type, we will process your personal data required by the legislation in force in order to issue these tickets, respectively the name, surname, personal identification number collected from your employer, information regarding your card (activation code, serial number, PAN, account number, card's date of issuance and expiry, card's balance, validity of the tickets uploaded on the card), information regarding the transactions that you performed with the card with the Trading Partners, where you used the tickets, as well as any other data categories that you directly provide in the context of creating a user account or in any other manner that results from using our websites listed under point 2.4. Optionally, for better communication, you can also provide us with your email and postal address or your phone number. We will also process any other personal data that you will directly provide (by correspondence, in writing or by phone).
- 2.3. **If you are a beneficiary of a card containing electronic currency (gift card or Spendeo)**, additionally to the data under point 2.2, when the legislation imposes measures for preventing money laundering and combating acts of terrorism, we will process the copy of the ID, the history of your transactions and we will collect information about you from public sources, in order to make sure that you are not on the international sanctions lists.

- 2.4. If you are a visitor of the www.edenred.ro, my.edenred.ro, www.ticketonthego.ro, econtract.edenred.ro, www.spendeo.com websites, we will process your personal data that you provide to us directly in the context of using these websites, like the data that you provide when you create an account, in the contact form, in the form for requesting an offer, in the order form, recommendations form, to the extent in which you fill in such forms. At the same time, we process the data generated by accessing and using the websites (information about the device being used - computer, phone, tablet - log information, like IP address, searches, type of browser, its language, hardware settings, date and hour of the request), including the data regarding your preferences or other data collected by means of technologies for analysing the activities of the users on the websites (like cookies; we recommend that you read also our [Cookies Policy](#)).
- 2.5. **If you apply for a job at Edenred as candidate**, by accessing the Careers section at www.edenred.ro or in any other way, we will process your personal data that you provide in this context, like name, surname, email address, phone number, experience, as well as any other data included in the documents that you choose to provide to us.
- 2.6. **If you are a contact person of the Partners (Clients, Trading Partners, Suppliers) or of the potential Partners**, we will process your contact details, like name and surname, email address and phone number, that you provide in the context of initiating or carrying out the contractual relationship with the Partners or potential Partners. At the same time we can obtain your contact details within our recommendations programs, from the visitors of our websites mentioned under point 2.4 or from the users of the MyEdenred mobile application, making sure that the person supplying the contact details has previously obtained your approval for such an activity.
- 2.7. Our websites will not collect or disclose data regarding race or ethnicity, political belief, religion, philosophical beliefs or any other similar ones, trade union membership or personal data regarding health or sexual activity.
3. **HOW IS YOUR PERSONAL DATA BEING USED AND WHAT ARE THE GROUNDS OF THE PROCESSING ACTIVITY?**
- 3.1. **If you are a beneficiary of the paper-based or electronic tickets issued by Edenred, or of the cards that contain e-currency (gift card or Spendeo card), we will process your personal data in the following manner:**
- a) for the contractual relationship between your employer and Edenred, respectively in order to issue the tickets, vouchers or cards in accordance with your employer's order and in order to process the transactions performed by you, At the same time, in order to process your requests related to accessing/using our products.

Grounds: The processing of your data for this purpose is based on the contract concluded between your employer and Edenred, as well as on the legal provisions in force, stating that certain types of tickets must be customized with a name, surname and personal identification number. It is necessary to provide your personal data. The refusal to provide the data may lead to the impossibility of granting the extra salary benefits negotiated with your employer. At the same time, in order to be able to transmit information about the amounts uploaded to your card, we will need your email address or your phone number.

- b) analyses and statistics regarding the utilization of our products

Grounds: We are preoccupied with constantly improving the quality of our products and services. Based on our legitimate interest, we use the data that we collect from you or other data that we generate / derive from you or which result from using our products for various statistics, analyses or studies. When we develop statistical analyses on the use of our products and services, the analysed data are strictly protected, and the aggregate results are used internally or they can be communicated to the trading partners based on an existing contractual relationship established to this regard, without allowing the identification of the data subjects and by observing the applicable legal requirements.

- c) direct marketing and other commercial communications

Grounds: We will send these communications if we have your approval. We would like to keep you informed about the novelties of the legislation underlying the Edenred solutions and services, regarding our products and those of our partners. We will be able to send promotional materials in order to inform you about our products and those of our partners. Additionally, we will be able to send invitations to attend events, participate in the promotions or campaigns carried out by Edenred independently or in collaboration with one or several of our partners, surveys and to fill in surveys and in order to communicate other similar information that we consider to be of interest to you. These data can be supplied on a voluntary basis. The refusal to supply the data to this regard will have no consequences for you.

- d) customization of offers

Grounds: We will send customized offers only if we have your approval. We want to provide products and services that are as relevant as possible, in accordance with your profile and interest. That is why, based on your approval, we can analyse the data and information about you from the following sources:

- (i) the data collected following your interaction with our websites under point 2.4;
- (ii) The data regarding the utilization of our products obtained from different sources: data supplied by you, data obtained from the customers' orders, transactions history and behaviour, data resulting from using our websites or the MyEdenred mobile application. These data can be supplied on a voluntary basis. The refusal to supply the data to this regard will have no consequences for you.

- e) fulfilment of certain legal obligations

Grounds: We have the following legal obligations that presuppose the processing of personal data, like:

- i) for certain products, we have specific obligations related to preventing and combating money laundering and financing of terrorism, and that is why we will carry out activities to get to know the clientele and any other activities imposed by the law;
- ii) payment of the relevant taxes and the charges, reporting to the relevant fiscal authorities and maintaining accounting books (e.g., when you participate in a competition organized by Us and you win prizes that are subject to taxes);
- iii) archiving the data according to the legislation in force;
- f) in order to ascertain, exercise or defend a right during a procedure before a court of law, during an administrative procedure or any other official procedure in which Edenred is involved, as well as settling your requests, claims and complaints

Grounds: The processing of your data for this purpose is based on our legitimate interest to defend our rights and interests.

3.2. **If you apply for a job at Edenred in the capacity of candidate**, we will process your



personal data by means of the "Careers" section of www.edenred.ro for the purpose of recruitment.

Grounds: The processing of data for this purpose is done following your request to conclude a contract. In the event in which you apply for a certain position, and you are not selected for the position for which you applied, we will continue to process your data based on our legitimate interest to take you into account for other vacant positions similar to the ones for which you initially applied, except for the situation in which you will request for your personal data not to be processed to this regard.

These data can be supplied on a voluntary basis. Your refusal to supply the data can have as consequence the impossibility of Edenred to take you into account during the recruitment process for different positions.

3.3. **If you visit the www.edenred.ro, my.edenred.ro, www.ticketonthego.ro, econtract.edenred.ro, www.spendeo.com websites**, we process your personal data in the following manner:

- a) for the marketing activities, respectively in order to send, by means of distance communication (e.g., email), commercial communications regarding the products and services provided by Edenred.

Grounds: We will send these communications if we have your approval. You can express your consent for the processing of the data to this regard, by filling in and ticking the correct box in the form for accepting commercial communications. These data can be supplied on a voluntary basis. The refusal to supply your consent to process the data to this regard will have no consequences for you.

- b) for settling claims, complaints and in order to monitor traffic and improve your experience on these websites.

Grounds: The processing of your data for this purpose is based on the legitimate interest of Edenred to ensure the proper functioning of the websites, as well as to permanently improve the experience of the visitors on these websites, including by answering different questions or settling different claims. If these data are missing we will not have the possibility to help solve the problem that you face.

3.4. **If you are a contact person for the Partners (Clients, Trading Partners, Suppliers) or of the potential Partners**, Edenred will process your personal data in the following manner:

- a) in order to initiate or carry out the contractual relationship between Edenred and its Partners or Potential partners.

Grounds: The processing of your data to this regard is based on the need to conclude and execute a contract, as well as on the legitimate interest of Edenred to initiate and have contractual relationships in the context of providing the services rendered by Us. The refusal to supply the data to this regard can have as consequences the impossibility of Edenred to carry out its activity.

- b) for the other purposes listed under section 3.3 above.

4. **HOW DO WE DISCLOSE YOUR DATA?**

4.1. On a case by case basis, we can disclose your personal data, exclusively for the processing purposes to:

- a) the companies that are part of the Edenred Group;
- b) our service suppliers (acting in the capacity of operators, or as persons empowered by Us) and which we contract for the administrative and processing services of our transactions, for marketing, other service suppliers (e.g., the company producing cards, suppliers of payment services, courier companies, suppliers of IT services);
- c) market research agencies that develop market studies for Us;

- d) other companies with whom we can develop joint programs of offers on the market of products and services;
- e) public authorities, if the disclosure is necessary in order to comply with an obligation foreseen by the applicable legislation.

4.2. The transmission of your personal data to the above mentioned recipients will be done only based on a confidentiality agreement and a commitment to ensure the adequate level of security from them, guaranteeing that the personal data is kept safe and that it is transmitted in accordance with the legislation in force.

5. TRANSFER OF PERSONAL DATA

5.1. The personal data supplied by Us can be transferred outside of Romania, but only to the states of the European Union.

6. PROCESSING DURATION

6.1. In general, we will process your personal data as much as it is necessary for the processing purposes above mentioned, except for the situations in which the legal provisions foresee or oblige us differently. Therefore:

- in what concerns the issuance of electronic or paper-based tickets, we will keep your data during the contractual relationship with your employer; in certain specific cases, according to the internal procedures of Edenred, we can keep your data for an additional period of 3 years (statute of limitation), except for the situation in which we are legally obliged to keep them for a longer period of time;
- in regard to the issuance of cards with electronic currency, we will keep your data for a period of 5 years, calculated as of the termination of the contractual relationship with your employer or with the partner that provided you the card, except for the situation in which we are legally obliged to keep them for a longer period of time;
- in regard to commercial communications sent by Edenred or by its partners, we will keep your email address or your phone number in the data base, as long as your subscription is active; as of the moment when we receive your request to unsubscribe, we will deactivate the communications being sent to your email address or your phone number;
- in regard to the online accounts that you create on our websites mentioned at point 2.4, we will keep your personal data during the existence of the account and following for the period necessary to prove the operations performed by means of the account; in the event in which you are a beneficiary of our products or the contact person of a Partner (Client or Trading Partner) and you exercise the right to deactivate the user account, Edenred will interpret this action as your option to unsubscribe from receiving commercial communications keeping you informed about the products and services offered by Us. To this regard, if you decide to deactivate your user account, we will no longer send communications to this regard. Nevertheless, we would like to inform you that deactivating your account will not automatically lead to deleting your personal data. In the event in which you don't want for your personal data to be processed or if you want to delete your data, you can exercise the rights detailed under point 7 below.
- in regard to the contact form and the form to request a customized offer, we will keep your personal data during the period necessary to provide answers to the messages and requests and prove the correspondence with you;

- in regard to the programs to recommend clients/merchants, we will keep your personal data during the period necessary to carry out these programs and prove the participation to these programs;
- in regard to the candidatures received in the "Careers" section, in the event in which we will not accept these candidatures, your data will be kept in the Edenred data base in order to participate in recruitment programs that will be carried out in the future, but not more than one year since being collected;
- in regard to the analyses related to browsing on our websites and your interactions with the websites, we will keep the data for a period of up to three years.

6.2. Edenred will delete all your personal data when it considers that it is no longer necessary for the purposes for which it was collected.

6.3. In any case, if you withdraw your approval and there are no legal grounds for processing or you oppose the processing and there are no legitimate reasons for the processing that would prevail, we will stop processing the data.

7. WHICH ARE YOUR RIGHTS

7.1. In regard to this processing of data, you have the right to request access to your personal data (you have the right to obtain from Edenred the confirmation that it processes your personal data, as well as information regarding the specificity of the processing, like), rectification (modification) or deletion of the data or restricting the Edenred processing, the right to oppose the processing within the limits and conditions provided by law, as well as the right to data portability (you have the right to request us to supply the personal data in a structured form, frequently used and which can be cited in an automatic manner, for example Excel). At the same time, if you choose to grant your consent, you have the right to withdraw it in any moment, without affecting the processing carried out by Edenred based on the consent expressed by you before being withdrawn. Furthermore, you have the right to submit complaints to the National Authority for the Surveillance of Personal Data Processing.

7.2. For any additional questions regarding the manner in which the personal data are processed and in order to exercise the rights above mentioned, please contact: **gdpr-ro@edenred.com**. You can also submit a customized request, signed and dated, containing your personal data that you would like us to update or delete, to our addresses, in the attention of the person responsible for processing personal data:

Headquarters in Edenred Bucharest, 133 Calea Șerban Vodă, 040205 - District 4, Bucharest.

7.3. Monitoring the observance of the legal requirements in this field is exclusively ensured by the data protection responsible appointed at the level of the Edenred Group, with the following contact: **dpo.romania@edenred.com**.

8. UPDATING THE INFORMATION INCLUDED IN THIS POLICY

8.1. Edenred can periodically update this Policy, as the activity and services provided by it are expanded or changed, or in the event in which Edenred is obliged by law to make amendments. In the event in which Edenred does this, it will display the latest version on its own websites. Therefore, please check periodically if such updates exist. In the event in which Edenred brings major amendments to the practices specified in the present Policy, we will inform you by using the available contact data.