



## PRIVACY POLICY

VERSION: AUGUST 2019

### 1. WHO WE ARE

- 1.1. This Privacy policy explains how we, Edenred Romania S.R.L., with registered office in Bucharest, Calea Șerban Voda 133, sector 4, Tax number RO10696741, registered in the Trade Register under no. J40/5659/1998, (hereinafter referred to as “**Edenred**” or “**We/Us**”) process your personal data. Moreover, in order to issue cards associated to electronic vouchers and to issue the e-money, Edenred collaborates with Prepay Technologies Ltd (hereinafter referred to as “**PPS**”), a company registered in England and Wales under number 04008033, with registered office in London, 6th Floor, 3 Sheldon Square, Paddington, W2 6HY, Great Britain, registered in the Financial Supervisory Authority Register (FSA) in Great Britain, who acts as personal data controller for the performed processing.
- 1.2. Please read the hereby privacy policy carefully in order to be properly informed about how We and PPS, in our capacity of personal data controllers, process your personal data and respect your rights as data subject.

### 2. WHAT INFORMATION WE COLLECT ABOUT YOU

- 2.1. **If you are a beneficiary of the vouchers issued by Edenred on paper**, regardless of their type, we shall process your personal data required by the laws in force for issuing these vouchers, namely your first and last name, personal number, collected through your employer, information regarding the Partner Retailers where you have used the vouchers. Optionally, for better communication, you can offer us your e-mail address and your postal address or your phone number. We shall also process any other personal data that you will directly provide to us (through the correspondence we carry out, in writing or by phone).
- 2.2. **If you are a beneficiary of the vouchers issued by Edenred on electronic support**, regardless of their type, we shall process your personal data required by the laws in force for issuing these vouchers, namely your first and last name, personal number, collected through your employer, information regarding your card (card activation code, card serial number, PAN, account number, card issue date and expiry date, the card's balance, the validity period of the vouchers loaded onto the card), information regarding the transactions you make using the card at the Partner Retailers where you have used the vouchers, as well as any other categories of data that you directly provide in the context of creating your user account or in any other way that results from the use of our websites indicated in art. 2.4. Optionally, for better communication, you can offer us your e-mail address and your postal address or your phone number.



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We shall also process any other personal data that you will directly provide to us (through the correspondence we carry out, in writing or by phone).

- 2.3. **If you are a beneficiary of cards containing e-money (gift card or Spendeo card)**, in addition to the data specified in art. 2.2, when the laws requires measures for the prevention of money laundering and for counter-terrorism, we shall process the copy of your ID, your transaction history and we shall collect information about you from public sources, in order to make sure that you are not mentioned on the international sanction lists.
- 2.4. If you are a **visitor on [www.edenred.ro](http://www.edenred.ro), [my.edenred.ro](http://my.edenred.ro), [www.ticketonthego.ro](http://www.ticketonthego.ro), [econtract.edenred.ro](http://econtract.edenred.ro), [www.spendeo.com](http://www.spendeo.com)**, we shall process your personal data that you directly provide while using these websites, such as the data you provide when creating an account, in the contact form, in the request offer form, the order form, recommendation form, to the extent that you fill out such forms. Moreover, we process your data generated by accessing and using the websites (information on the device used – computer, phone, tablet – log information, such as IP address, search queries, browser type, its language, hardware settings, data and time of the request), including data regarding your preferences or other data collected through technologies that analyze user activities on web pages (such as cookies; we recommend that you also read our [Cookies policy](#)).
- 2.5. **If you apply for a job within Edenred, as a candidate**, by accessing the Careers section available at [www.edenred.ro](http://www.edenred.ro) or in any other way, we shall process your personal data provided in this context, such as first and last name, e-mail address, phone number, experience and any other data included in the documents that you choose to provide to us.
- 2.6. **If you are a contact person of our Partners (Clients, Partner retailers, Providers) or potential Partners**, we shall process your contact information, such as first and last name, e-mail address and phone number, job title / position name, workplace address, information which you provide when initiating or while carrying out the contractual relationship with the Partners or potential Partners. Moreover, we can obtain your contact information within our recommendation programs, from the visitors of our websites mentioned in art. 2.4 or the users of MyEdenred mobile app, however making sure that the person who sends us your contact information has obtained your prior consent for such action.
- 2.7. Through our websites, no data will be collected or disclosed regarding racial or ethnic origin, political beliefs, religious or philosophical beliefs or similar ones, membership of any unions or any personal data related to health condition or sexual life.

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### 3. WHAT IS YOUR PERSONAL DATA USED FOR AND WHAT ARE THE PROCESSING GROUNDS?

- 3.1. **If you are beneficiary of the vouchers issued by Edenred, on paper or on electronic support, or beneficiary of cards containing e-money (gift card or Spendeo card), we shall process your personal data as follows:**



- a) In order to carry out the contractual relationship between your employer and Edenred, namely for issuing tickets, vouchers or cards according to the order placed by your employer, for processing your transactions, and in addition, for processing your requests regarding the access/use of our products.

**Grounds:** For this purpose, your data is processed based on the Agreement concluded between your employer and Edenred, as well as the legal provisions in force, which specify that certain types of vouchers must be customized with first and last name and personal number. It is necessary to provide your personal data. Your refusal to provide the data may lead to the impossibility of awarding the extra-salary benefit negotiated with your employer. Moreover, in order to send you information regarding the amounts topped-up on your card, we will need your e-mail address or your phone number.

- b) Analyses and statistics regarding the use of our products

**Grounds:** We are looking to constantly improve the quality of our products and services. Based on our legitimate interest, we use the data we collect from you or other data that we generate/draw from the data received from you or resulting from the use of our products for various statistics, analyses and studies. When making statistical analyses regarding the use of our products and services, the analyzed data is strictly protected, and the aggregated results are used internally or may be communicated to business partners based on an existing contractual relationship in this respect, without allowing the identification of the data subjects and in compliance with the applicable legal requirements.

- c) Direct marketing and other business communication

**Grounds:** We shall send you these communications only if we have obtained your consent in this respect. We wish to keep you up to date with news regarding the laws that Edenred solutions and services are based on, regarding our products and our partners' products. We will be able to send you promotional material to inform you about our products or our partners' products. In addition, we will be able to send you invitations to participate in the events, promotions and campaigns carried out by Edenred, independently or in collaboration with one or more partners, to participate in surveys or to answer questionnaires and to communicate other similar information that we consider to be of interest for you. Providing the data for this purpose is voluntary. Refusal to provide this data for this purpose shall not have any consequence for you.

- d) Customizing offers

**Grounds:** We will send you customized offers only if we have obtained your consent in this respect. We wish to offer you products and services as relevant as possible, in accordance with your profile and your field of interest. Therefore, based on your consent, we can analyze your data and information from the following sources: (i) data collected following your interaction with our websites mentioned in art. 2.4; (ii) data regarding the use of our products, obtained from various sources: data provided by you, data obtained from the orders placed by clients, transactions history



and behavior, data resulting from the use of our websites or MyEdenred mobile app. Providing the data for this purpose is voluntary. Refusal to provide this data for this purpose shall not have any consequence for you.

e) Fulfilling certain legal obligations

**Grounds:** We are subject to certain legal obligations that imply personal data processing, such as:

i) for certain products, we have specific obligations regarding the prevention and fight against money laundering and terrorism financing, and for this reason we shall perform KYC (know your customer) operations and any other operations required by the law;

ii) payment of relevant taxes and contributions, reporting to the relevant tax authorities and keeping accounting records (for example, when you participate in a contest organized by Us and you win prizes that are subject to taxation);

iii) archiving the data according to the applicable laws;

f) For establishing, exercising or defending a right in court, within a procedure before the court, an administrative procedure or other official procedures that involve Edenred, as well as for solving your requests, complaints or grievances.

**Grounds:** For this purpose, your data is processed based on our legitimate interest in defending our rights and interests.

3.2. **If you apply for a job within Edenred, as candidate**, we shall process your personal data received through the "Careers" section at [www.edenred.ro](http://www.edenred.ro) for recruiting purposes.

**Grounds:** For this purpose, your data is processed based on the procedures implied by your request to conclude an agreement. If you apply for a certain position, but you are not selected for the position you are applying for, we shall continue to process your data based on our legitimate interest of considering you for other vacancies similar to the one you initially applied for, except the case when you request us to stop processing your personal data for this purpose.

Providing your data for this purpose is voluntary. Refusal to provide this data for this purpose may have, as consequence, the impossibility of Edenred to consider you in the recruitment process for various positions.

3.3. **If you are a visitor of [www.edenred.ro](http://www.edenred.ro), [my.edenred.ro](http://my.edenred.ro), [www.ticketonthego.ro](http://www.ticketonthego.ro), [econtract.edenred.ro](http://econtract.edenred.ro), [www.spendeo.com](http://www.spendeo.com)**, we process your personal data as follows:

a) For marketing activities, namely for sending you business communications regarding the products and services offered by Edenred, by means of distance communication (e.g. e-mail).



**Grounds:** We shall send you these communications only if we have obtained your consent in this respect. You can give your consent for processing data for this purpose by filling out and checking the related box in the form regarding the acceptance of business communications. Providing the data for this purpose is voluntary. Refusal to provide your consent for processing your data for this purpose shall not have any consequence for you.

b) To solve complaints and grievances, to monitor the traffic and improve your experience offered on these websites.

**Grounds:** For this purpose, your data is processed based on Edenred's legitimate interest to ensure the correct operation of the websites, as well as to constantly improve the visitors' experience on these websites, including the resolution of various queries or complaints. In the absence of these data we will not be able to help solving the issue you are encountering.

3.4. **If you are a contact person of our Partners (Clients, Partner retailers, Providers) or potential Partners**, Edenred shall process your personal data as follows:

a) To initiate or carry out the contractual relationship between Edenred and the Partners or potential Partners.

**Grounds:** For this purpose, your data is processed based on the necessity of concluding and executing an agreement, as well as on Edenred's legitimate interest to initiate and carry out the contractual relationships in the context of offering the services provided by Us. Refusal to provide this data for this purpose may lead, as a consequence, to the impossibility of Edenred to carry out its activity.

b) for marketing activities, namely to send business communications regarding the products and services offered by Edenred, through means of distance communication (e.g. e-mail).

**Grounds:** Your personal data shall be processed for this purpose based on Edenred's legitimate interest to send communications addressed to professionals aiming to ensure the promotion and development of Edenred business and, at the same time, to facilitate the access of its clients / partners to the services offered by Edenred, which might be useful/of interest for their business.

c) for marketing activities, namely to send business communications regarding the products and services offered by Edenred partners, through means of distance communication (e.g. e-mail).

**Grounds:** For this purpose, we shall process your personal data based on your express consent, and based on the indirect consent, collected through the agreement, for the persons who, by the nature of their position, may receive such communications.

#### 4. TO WHOM DO WE DISCLOSE YOUR DATA?



- 4.1. According to each case, we may disclose your personal data, exclusively for fulfilling the processing purposes, to:
- a) Companies within Edenred Group;
  - b) Our service providers (acting either as controllers or processors authorized by Us) that We contract for administrative services and transaction processing services, for marketing purposes, other service providers (e.g. the company producing the cards, payment service providers, courier companies, IT service providers);
  - c) Agencies dealing with market research, who carry out market studies for Us;
  - d) Other companies with whom we may develop joint programs for offering our products and services on the market;
  - e) Public authorities, if the disclosure is necessary in order to comply with an obligation provided by the applicable laws;
  - f) Your employer, Edenred business partner, upon its request.
- 4.2. Your personal data is shared with the abovementioned recipients only based on a commitment made by them to keep the confidentiality and to ensure a proper security level, guaranteeing that the personal data is kept safe and that it is shared in compliance with the laws in force.

## **5. PERSONAL DATA TRANSFER**

- 5.1. Personal data provided to Us may be transferred outside Romania, but only to Member states of the European Union.

## **6. PROCESSING DURATION**

- 6.1. Generally, we will process your personal data as long as it is necessary to fulfill the abovementioned processing purposes, except for the circumstances when the laws provide or compel otherwise. Thus:
- With regards to issuing vouchers on paper or on electronic support, we shall keep your personal data for the duration of the existing contractual relationship with your employer; in certain specific cases, according to Edenred's internal policies, we may keep your data for a reasonable additional period required for us to exercise or defend certain rights with regard to the offered products/services and the processed personal data;
  - With regards to issuing cards containing e-money, we shall keep your data for a period of 5 years, calculated from the date of termination of the contractual relationship with your employer or with the partner who has offered that card to you, except for the case when we are legally compelled to keep them for a longer period, or if applicable, for a reasonable additional period required for us to exercise or defend certain rights with regard to the offered products/services and processed personal data;



- With regard to business communications sent by Edenred or by its partners, we shall keep your e-mail address or your phone number in the database for as long as your subscription is active; the moment we receive your request to unsubscribe, we shall deactivate the transmission of such communications to your e-mail address or to your phone number;
- With regard to the online accounts that you create on our websites mentioned in art. 2.4, we shall keep your personal data as long as the account exists and later, for the period necessary to prove the operations performed through the account; if you are a beneficiary of our products or the contact person of a Partner (Client or Partner retailer) and you exercise your option to deactivate the user account, Edenred shall construe this action as your option to unsubscribe from receiving business communications by which we keep you updated about the products and services that We offer. In this respect, if you choose to deactivate your user account, we shall stop sending you this kind of communications. However, we wish to inform you that the account deactivation shall not automatically lead to the deletion of your personal data. If you wish us to stop processing your personal data or you wish to delete this data, you can exercise your rights detailed in article 7 below.
- With regard to the contact form and customized offer request form, we shall keep your personal data for the period necessary to provide replies to your messages and requests, and to prove the correspondence we have had with you;
- With regard to the client/retailers recommendation programs, we shall keep your personal data for the period necessary to carry out these programs and to prove your participation in these programs;
- With regard to applications received through the "Careers" section form, if we do not give a favorable response to these applications, if you have given your consent, your data will remain in Edenred's database to participate in future recruitment programs, but not more than one year from the date when they were collected;
- With regard to analyses performed about browsing our websites and your interactions with the websites, we shall keep your data for a period up to 3 years.

6.2. Edenred may delete your personal data when it considers that they are no longer necessary for the purposes that they have been collected for.

6.3. In all cases, if you withdraw your consent and there are no other legal grounds for processing or you refuse the processing, and there are no prevailing legitimate and stringent reasons for processing, we will terminate the data processing.

## **7. YOUR RIGHTS**

7.1. With regard to this data processing, you are entitled to request access to your personal data (you are entitled to obtain, from Edenred, the confirmation that we are processing your personal data, as well as information regarding the nature of the processing, such as), the



correction (modification) or deletion of the data or processing restriction, you have the right to refuse the processing within the limits and conditions provided by the law, as well as the right to data portability (you are entitled to request us to provide your personal data in a frequently used, structured form, that can be read in an automated manner, for example in Excel). Moreover, if you choose to give your consent, you are entitled to withdraw it at any time, but without affecting the processing carried out by Edenred based on your consent expressed before withdrawing it. In addition, you are entitled to file complaints at the National Supervisory Authority for Personal Data Processing.

- 7.2. For any additional questions regarding how your personal data is processed and to exercise your rights mentioned above, please send your request to: **gdpr-ro@edenred.com**. You can also send a customized request, with date and your signature, containing your personal data that you wish to update or delete, to our addresses, to the attention of the person in charge of personal data processing:

Edenred registered office Bucharest, Calea Șerban Vodă 133, 040205 - Sector 4, Bucharest.

- 7.3. Monitoring the compliance with the legal requirements in this field is also ensured by the person in charge of data protection, appointed within Edenred Group, having the following contact data: [dpo.romania@edenred.com](mailto:dpo.romania@edenred.com).

## **8. UPDATES OF THE INFORMATION INCLUDED IN THIS POLICY**

- 8.1. Edenred may periodically update the hereby Policy, as the activity and the services provided by us expand or change, or when Edenred is bound by the law to make changes. If Edenred does so, the most recent version will be displayed on our websites. Therefore, please check our websites regularly to see if there are any updates. If Edenred makes major changes to the practices specified in the hereby Policy, we shall notify you using your contact information available.