



POLICY OF PRIVACY

VERSION OF: JANUARY 2020

1. WHO ARE WE?

- 1.1. This Privacy Policy explains to you the way we, Edenred Romania S.R.L., located in Bucharest, Calea Șerban Voda 133, sector 4, CUI RO10696741, registered in the Trade Register under no. J40/5659/1998, (hereinafter referred to as "**Edenred**" or "**We**") process your personal data. Also, in order to issue the cards corresponding to the electronic vouchers and to issue the electronic currency, Edenred collaborates with Prepay Technologies Ltd (hereinafter referred to as "**PPS**"), a company registered in England and Wales under number 04008033, with its registered office in London, 6th Floor, 3 Sheldon Square, Paddington, W2 6HY, United Kingdom, registered in the UK Financial Services Authority (FSA), which functions as controllers of personal data.
- 1.2. We invite you to carefully read this privacy policy so as to be adequately informed about the way We and PPS, as controllers of personal data, we process your data and we observe your rights as person in question.

2. WHAT IS THE 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 will process your personal data required by the legislation in force in order to issue these vouchers, i.e. name, surname, personal identification number collected through your employer, information about the Trade Partners where you used the vouchers. Optionally, for a better communication, you may also give us your e-mail and mail address or your phone number. We will also process any other personal data you provide us directly (by correspondence, in writing or by telephone).
- 2.2. **If you are a beneficiary of the electronic vouchers issued by Edenred**, regardless of their type, we will process your personal data required by the legislation in force in order to issue these vouchers, i.e. name, surname, personal identification number collected through your employer, information about your card (activation code, card series, PAN, account number, date of issuance and expiry of the card, balance, validity of the vouchers charged on your card) information regarding your card transactions with the Trade Partners where you used the vouchers, as well as any other type of data you provide directly when creating the user account or in any other way resulting from using our websites mentioned at point 2.4. Optionally, for a better communication, you may also give us your e-mail and mail address or your phone number. We will also process any other personal data you provide us directly (by correspondence, in writing or by telephone).

- 2.3. If you are a beneficiary of electronic money cards (Spendedo card), in addition to the data mentioned at point 2.2, when the legislation imposes measures to prevent money laundry and to combat terrorist acts, we will process the copy of your identity card, your transaction history, and we will collect information about you from public sources to ensure that you do not appear on international sanction lists.
- 2.4. If you are a visitor of www.edenred.ro, my.edenred.ro, www.ticketonthego.ro, econtract.edenred.ro, www.spendedo.com, we will process the personal data you provide directly when using these websites, such as the data you provide when you create an account, on the contact form, the quote form, the order form, the recommendation form, to the extent that you complete such forms. We also process data generated by accessing and using websites (information about the device used –computer, phone, tablet– log information, such as the IP address, search queries, browser type, language, hardware settings, date and time of the request), including data on your preferences or other data collected through technologies analysing the users' activities on the Internet pages (such as cookies; we recommend that you also read [our cookies Policy](#)).
- 2.5. If you apply for a job at Edenred as a candidate, by accessing the section Careers available on www.edenred.ro or by any other way, we will process the personal data you provide in this context, such as your name, surname, email address, phone, experience as well as any other data included in the documents you choose to provide to us.
- 2.6. **If you are a contact person for the Partners (Customers, Trade Partners, Suppliers) or for the potential Partners**, we will process your contact details, such as name and surname, e-mail address, and phone number, position/function, place of work, information that you provide when initiating or developing your contractual relationship with the Partners or potential Partners. We can also obtain your contact details within our recommendation programmes, from people who visit our websites mentioned at point 2.4 or from the users of MyEdenred mobile application, ensuring however that the person transmitting your contact details has previously obtained your consent for such an action.
- 2.7. Through our websites, we will not collect or disclose data on racial or ethnic origin, political beliefs, religious, philosophical or other of similar nature, union membership or personal data on your health or sexual life.
3. **WHAT IS YOUR PERSONAL DATA USED FOR AND WHAT ARE THE GROUNDS FOR PROCESSING?**
- 3.1. If you are a beneficiary of the vouchers issued by Edenred, on paper or electronically, or of cards containing electronic currency (Spendedo card), we will process your personal data as follows:



- a) to perform the contractual relationship between your employer and Edenred, respectively for issuing the tickets, the vouchers or cards according to the order placed by your employer, to send the information regarding the amounts charged on your card, to send the information regarding the tickets about to expire and to process the transactions you made. Also, to process your requests regarding the access/use of our products.

Grounds: To this end the processing of your data is based on the agreement concluded between your employer and Edenred, as well as on the legal provisions in force stating that certain types of vouchers must be customized with name, surname and personal identification number. It is necessary to provide your personal data. The refusal to provide your data may lead to an impossibility to be granted the benefits package you have negotiated with your employer. The refusal to provide your contact data (email or telephone) means that we will no longer be able to inform you about the amounts charged on your card or about the expiring vouchers, but it will not cause any negative consequences regarding the functionality of our products.

- b) analyses and statistics on the use of our products

Grounds: We strive to constantly improve the quality of our products and services. Based on our legitimate interest, we use the data collected from you or other data we generate/deduce from the data received from you or resulted from using our products for various statistics, analyses and surveys. When we conduct statistical analyses on the use of our products and services, the analysed data is strictly protected and the aggregated results are used internally or may be communicated to our trade partners on the basis of an existing contractual relationship in this regard, without allowing the identification of the data subjects and observing the applicable legal requirements.

- c) to send messages aimed at improving our services (surveys of questionnaires)

Grounds: Because we want you to have the best interaction with our products and services, based on our legitimate interest, we will use your data (email and telephone) as user of our products or obtained in any other manner when you made this data available for the representatives of our company, to find out your opinion about the quality of our products.

We will never ask for more than your feedback regarding the use of our products and we will use your answers to make our products and services simpler and more effective to use.

- d) direct marketing and other trade notifications

Grounds: We will send these notifications to you only if we have obtained your consent. We want to keep you updated on the legislation that supports Edenred's solutions and services, regarding our products and our partners. We will be able to send you promotional materials to inform you about our products or our partners'. In addition, we will be able to launch invitations to participate in events, promotions and campaigns conducted by Edenred independently or in collaboration with one or more partners and to communicate to you other similar information that we



believe may be of interest to you. To this end, providing your data is voluntary. The refusal to provide your data to this end shall not have any consequences for you.

e) creating profiles in order to customize the promotional offers

Grounds: Edenred may divide its own customers according to several criteria in order to classify them in various categories for marketing and/or analysis purposes.

The processing of your data for this purpose is based on a legitimate interest. These profiles do not entail exclusive automatic decision making. We want to offer you the most relevant products and services, in agreement with your profile and area of interest. Therefore, we can analyse the data and information about you from the following sources: (i) the data collected following your interaction with our websites mentioned at point 2.4; (ii) the data on the use of our products obtained from different sources: data provided by you, data obtained from the orders placed by clients, transaction history and behaviour, data resulting from the use of our websites or of MyEdenred mobile application.

f) fulfilment of legal obligations

Grounds: We have certain legal obligations that involve the processing of personal data, such as:

i) for certain products, we have specific obligations regarding the prevention and combating of money laundering and terrorist financing, which is why we shall take measures to know our customers and any other operations required by 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 law;

g) To find, exert or defend a legal right in proceedings before a court, in an administrative proceeding or in other official proceedings involving Edenred, as well as for the settlement of requests, complaints or claims.

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

3.2. **If you apply for a job at Edenred as a candidate**, we will process your personal data received in the section "Careers" on www.edenred.ro for recruiting purposes.

Grounds: The processing of your data to this end is based on your request to conclude an agreement. If you apply for a specific job, but you are not selected for the job you applied for, we will continue to process your data based on our legitimate interest in considering you for other vacancies similar to those for which you applied initially, unless you request that your personal data no longer be processed for this purpose.



To this end, providing your data is voluntary. The refusal to provide your data may lead to an impossibility for Edenred to consider you in the recruitment process for different positions.

3.3. **If you are a visitor on www.edenred.ro, my.edenred.ro, www.ticketonthego.ro, econtract.edenred.ro, www.spendeo.com, we will process your personal data as follows:**

a) for marketing activities, respectively to send, by means of remote communication (e.g. e-mail), commercial notifications regarding the products and services offered by Edenred.

Grounds: We will send these notifications to you only if we have obtained your consent. You may express your consent to have your data processed for this purpose by filling in and checking the appropriate box on the form regarding your consent for commercial notifications. To this end, providing your data is voluntary. The refusal to give your consent to have your data processed for this purpose shall have no consequences for you.

b) in order to solve any complaints, claims and to monitor the 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 continuously improve the visitors' experience on these sites, including by solving different questions or complaints. If we do not have this data we will not be able to help you in solving the problem you are dealing with.

3.4. **If you are a contact person for the Partners (Customers, Trade Partners, Suppliers) or for the potential Partners, Edenred processes your personal data as follows:**

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

Grounds: The processing of your data for this purpose is based both on the need to conclude and execute an agreement and on the legitimate interest of Edenred to initiate and conduct the contractual relationship in the context of offering the services we provide. The refusal to provide your data for this purpose may result in an impossibility of Edenred to carry out its activity.

b) for marketing activities, respectively to send, by means of remote communication (e.g. e-mail), commercial notifications regarding the products and services offered by Edenred.

Grounds: The processing of your data for this purpose will be based on the legitimate interest of Edenred to send notifications to professionals aimed at ensuring the promotion and development of Edenred and at the same time at facilitating the access of its clients/partners to the services offered by Edenred that might be useful/of interest to their businesses.

c) to send, by means of remote communication (e-mail and telephone), commercial notifications regarding the improvement of our services.



Grounds: Since we have a legitimate commercial interest to maintain our relationship with our partners so as to improve the services and products we offer, we will send you notifications related to the degree of satisfaction you have with our company (e.g.: satisfaction surveys related to the orders placed), because we are in a contractual relationship with the company you represent and you are the most appropriate person to give us a feedback regarding your interaction with Edenred.

d) for marketing activities, respectively to send, by means of remote communication (e.g. e-mail), commercial notifications regarding the products and services offered of by Edenred's partners.

Grounds: To this end we will process your data based on your consent, directly expressed, and based on your indirect consent, collected through the agreement, for persons who, according to the nature of their position may receive such notifications.

4. TO WHOM DO WE DISCLOSE YOUR DATA?

4.1. As the case may be, we can disclose your personal data, solely for the purposes of processing, to:

- a) companies within the Edenred Group;
- b) our service providers (acting either as controllers or as persons authorised by Us) and who we contract for administrative and transaction processing services, for marketing, other service providers (e.g. the company manufacturing the cards, the payment service providers, courier companies, IT service providers);
- c) agencies for market research which conduct market surveys for us;
- d) other companies with which we can develop common programmes to put our products and services on the market;
- e) public authorities, if such disclosure is necessary to comply with an obligation under the applicable law;
- f) your employer, Edenred's trade partner, upon request.

4.2. The transmission of your personal data to the abovementioned recipients will only be made based on a commitment to privacy and to ensuring an adequate level of security on their part, guaranteeing that your personal data is kept safe and that its transmission is made in accordance with the legislation in force.

5. TRANSFER OF PERSONAL DATA

5.1. The personal data provided to Us may be transferred outside Romania, only to those states members of the European Union.



6. DURATION OF PROCESSING

6.1. Generally, we will process your personal data for as long as necessary to achieve the processing purposes mentioned above, except where the legal provisions state or oblige us otherwise. As follows:

- With regard to the issuance of electronic or paper vouchers, we will retain your data during the existence of a contractual relationship with your employer; In certain specific cases, according to the internal policies of Edenred, we can retain your data for a reasonable additional period necessary to exercise or defend our rights in relation to the products/services offered and with the personal data processed;
- with regard to the issuance of electronic money cards, we will retain your data for the period of 7 years calculated from the termination of your contractual relationship with your employer or with the partner who offered you that card, unless we are legally obliged to retain such data for a longer period of time, or, where appropriate, for a reasonable additional period necessary to exert or defend our rights in relation to the products/services offered and with the personal data processed;
- with regard to the commercial notifications sent by Edenred or its partners, we will retain your e-mail address or phone number in our database as long as your subscription is active; from the moment we receive your request to unsubscribe, we will deactivate the sending of such notifications to your e-mail address or phone number;
- with regard to the online accounts that you create on our websites mentioned at point 2.4, we will retain your personal data during the existence period of your account and subsequently for the period necessary to prove the operations made through the account; if you are a beneficiary of our products or the contact person of a Partner (Customer or Trade Partner) and you exert your option to disable the user account, Edenred will understand this action as your option to unsubscribe from receiving commercial notifications by which we keep you informed of products and services we offer. In this respect, if you choose to deactivate your user account, we will cease to send you any notifications of this kind. However, we would like to inform you that disabling your account will not automatically erase your personal data. If you want to stop your personal data from being processed, or if you want to erase your data, you can exert your rights detailed at point 7 below.
- with regard to the contact form and the application form of a customized offer, we will retain your personal data for the period necessary to provide answers to your messages and requests and to prove the correspondence we have had with you;
- with regard to customer/traders recommendation programmes, we will retain your personal data for the period necessary to carry out these programmes and to prove your participation in these programmes;



- with regard to the applications received through the form in the "Careers" section, if we do not follow up on these applications, if you have given your consent, your data will remain in the Edenred database so that you could participate in recruitment programmes to be conducted in the future, but not for a longer period than one year from the date of their collection;
- with regard to the analysis of your browsing on our websites and to your interactions with the websites, we will retain the data for up to 3 years.

6.2. Edenred may erase 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 consent and there are no legal grounds for processing or you oppose the processing and there are no legitimate and compelling reasons for the processing to prevail, we shall cease such processing of your data.

7. WHAT ARE YOUR RIGHTS

7.1. Regarding this processing of your data, you have the right to request access to their personal data (you have the right to obtain from Edenred the confirmation that Edenred processes your personal data, as well as information on the specifics of the processing), its rectification (modification) or deletion or the restriction of the processing, the right to object to the processing within the limits and conditions provisioned by the law, as well as the right to data portability (they have the right to request us to provide your personal data in a structured, frequently used form which can be read in an automated manner, such as the Excel format). Also, if you choose to give your consent, you have the right to withdraw it at any time without affecting the processing carried out by Edenred on the basis of the consent expressed by you prior to this withdrawal. In addition, you have the right to submit complaints to the National Supervisory for Personal Data Processing.

7.2. For any further questions as to how your personal data is processed and to exert your rights as mentioned above, please go to: gdpr-ro@edenred.com. You can also submit a personalized request, signed and dated with your personal data that you wish us to update or delete, to our addresses, to the attention of the data processing officer:

Headquarters of Edenred Bucharest, Calea Șerban Vodă 133, 040205 - Sector 4, Bucharest.

7.3. The compliance with the legal requirements in this field is monitored and ensured inclusively by the person responsible to protect the data appointed within the Edenred Group, who has the following contact details: dpo.romania@edenred.com.

8. UPDATING THE INFORMATION INCLUDED IN THIS POLICY

8.1. Edenred may periodically update this Policy as the activity and services rendered by it extend or change, or if Edenred is obliged by law to make changes. Should Edenred do that, it will display on its websites the most up to date version. As such, please check regularly if there are any



updates. Should Edenred bring major changes to the practices specified in this Policy, we will notify you using the available contact details.