

# Privacy policy of Edenred Sp. z o.o. [Limited Liability Company]

## Table of Contents

1. Preliminary information .....	1
2. Dictionary of terms.....	2
3. Information about the Administrator .....	3
4. Data Protection Officer .....	3
5. Co-administration.....	4
6. Legal basis and purpose of processing.....	4
7. Providing data .....	7
8. Rights of data subjects .....	8
9. Website security.....	11
10. Cookies .....	12
11. Profiling .....	14
12. Final Provisions.....	14

## 1. Preliminary information

With a view to ensuring the highest standards of security of personal data processing, Edenred Sp. z o. o. [LLC] would like to inform you that this privacy policy complies with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27.04.2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and the standards contained in the domestic provisions, in particular it complies with the provisions of the Act on the provision of electronic services of July 18, 2002. (Journal of Laws No. 144, item 1204, as amended).

The information presented in the Policy will allow you to familiarize yourself in detail with the principles of processing personal data as part of contact with Edenred Sp. z o. o. [LLC] and using the edenred.pl website.

## 2. Dictionary of terms

**Administrator** - The Administrator of your personal data is Edenred Sp. z o. o. [LLC] with its registered office in Warsaw at Rozbrat 44A, 00-419 Warsaw, registered in the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, XII Commercial Department of the National Court Register, KRS No.: 0000116438, Polish Tax ID No. NIP: 6641003662, Polish Statistical No. REGON: 29057212500000

**Co-administrator** - at least two administrators who jointly set goals and methods of processing.

**Personal data** - any information about an identified or identifiable natural person ("data subject"); an identifiable natural person is a person who can be directly or indirectly identified.

**EEA** - The European Economic Area, the free trade area and the common market, including European Union countries and the European Free Trade Association (EFTA), with the exception of Switzerland. This is the area where the free transfer of personal data takes place.

**Data Recipient** - means a natural or legal person, organisational entity without legal personality (the so-called unincorporated body), public authority, unit or other entity to whom personal data is disclosed, regardless of whether it is a "third party".

**Third countries** - non-EEA countries.

**Cookies** - small information, called cookies, sent by the website that we visit, saved on the end device (computer, laptop, smartphone), which we use when browsing websites.

**President of the Office** - President of the Personal Data Protection Office, a supervisory body within the meaning of the GDPR, which supervises compliance with legal provisions in the field of personal data protection in Poland.

**Profiling** - means any form of automated processing of personal data that involves the use of personal data to assess the personal factors of a natural person, in particular an analysis or forecasting of aspects of the natural person's work results, economic situation, health, personal preferences, interests, credibility, behaviour, location or movement of the data subject - provided that such action has legal effects for that person or significantly affects such person in a similar way.

**Processing** - means an operation or set of operations performed on personal data or sets of personal data in an automated or non-automated manner, such as collecting,

recording, organizing, putting in order, storing, adapting or modifying, downloading, viewing, using, disclosing by sending, disseminating or otherwise sharing, matching or combining, limiting, deleting or destroying.

**Policy** - privacy policy of Edenred Sp. z o.o. [LLC]

**GDPR** - Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

**Act on Providing Services by Electronic Means** - Act on Providing Services by Electronic Means of July 18, 2002. (Journal of Laws No. 144, item 1204, as amended).

**TA** - Telecommunications Act of July 16, 2004. (Journal of Laws No. 171, item 1800, as amended)

### **3. Information about the Administrator**

The Administrator of your personal data is Edenred Sp. z o.o. [LLC] with its registered office in Warsaw at Rozbrat 44A, 00-419 Warsaw, registered in the National Court Register kept by the District Court for the Capital City of Warsaw in Warsaw, XII Commercial Department of the National Court Register under KRS No.: 0000116438, Polish Tax Identification No. NIP: 6641003662, Polish Statistical No. REGON: 29057212500000

**The administrator can be contacted via email [rodo@edenred.com](mailto:rodo@edenred.com) or via phone +48 (22) 209 82 55.**

### **4. Data Protection Officer**

The Administrator has appointed a Data Protection Officer. Contact with him/her is possible via email, address: [rodo@edenred.com](mailto:rodo@edenred.com).

## 5. Co-administration

Please be advised that as regards personal data processed in connection with maintaining the Edenred profile on Facebook, the administrator of your personal data processed on this portal is both Edenred Sp. z o. o. [LLC" and Facebook Ltd., jointly referred to as co-administrators.

All information about the processing of personal data by Edenred and the rights you have against Edenred can be found in this privacy policy.

In terms of your own Facebook profiles, research regarding your behaviour on this portal, exercising your rights, etc., please contact Facebook.

Please be advised that by liking, i.e. by clicking the "like" button, you agree to the processing of your personal data.

For more information on co-administration and methods of personal data processing, in particular by Facebook, see the regulations and policies on the Facebook page.

## 6. Legal basis and purpose of processing

Purpose of processing	Legal basis	Data recipients	Processing time
<b>Presentation of the offer</b> <b>(in the case of persons directing an inquiry on their own behalf, i.e. consumers)</b>	Art. 6 clause 1 letter b of GDPR i.e. processing is necessary in order to take steps at the request of the data subject prior to entering into a contract	for providers of hosting services, suppliers of tools supporting customer service (e.g. CRM, telephone exchange, DMS document circulation), prepaid card manufacturers, accountants, accounting system providers.	To complete the offering process.
<b>Presentation of the offer</b> <b>(in the case of persons directing</b>	Article 6 clause 1 letter F of GDPR, i.e. processing is necessary for the purposes of the	for providers of hosting services, suppliers of tools supporting customer service (e.g. CRM,	To complete the offering process.

<p><b>an inquiry on behalf of the entity for which they provide services, i.e. B2B)</b></p>	<p>legitimate interests pursued by the administrator in offering and establishing business cooperation.</p>	<p>telephone exchange, DMS document circulation), prepaid card manufacturers, accountants, accounting system providers.</p>	
<p><b>Cooperation with B2C customers (in the case of individual customers, i.e. consumers)</b></p>	<p>Art. 6 clause 1 letter b of GDPR i.e. processing is necessary for the performance of a contract to which the customer is party.</p>	<p>for providers of hosting services, suppliers of tools supporting customer service (e.g. CRM, telephone exchange, DMS document circulation), prepaid card manufacturers, accountants, accounting system providers.</p>	<p>For the period corresponding to the prescription period of civil law and accounting regulations.</p>
<p><b>Cooperation with B2B customers (in the case of contractor's staff members, in particular persons authorized to collect the delivery)</b></p>	<p>Art. 6 clause 1 letter f of GDPR i.e. processing is necessary for the purposes of the legitimate interests to reach contact in order to perform the contract.</p>	<p>for providers of hosting services, suppliers of tools supporting customer service (e.g. CRM, telephone exchange, DMS document circulation), prepaid card manufacturers, accountants, accounting system providers.</p>	<p>Until the end of cooperation. This period may be extended by prescription periods for claims.</p>
<p><b>Acceptance and handling of the received inquiry via the contact form</b></p>	<p>Art. 6 clause 1 letter f of GDPR i.e. processing is necessary for the purposes of the legitimate interests in administering</p>	<p>IT service providers; Hosting providers;</p>	<p>Until the complete termination of the inquiry. Depending on the content of the inquiry, the sender's personal data may be processed for a</p>

	received correspondence, in particular in receiving and handling received messages.		sufficient time.
<b>Sending a recording from a webinar or report.</b>	Article 6 clause 1 letter B of GDPR, i.e. processing is necessary to perform the contract, in the form of delivering a recording from a webinar or report.	IT service providers; Hosting providers;	The data will be processed until the report or recording from the webinar is sent.
<b>For marketing purposes, in particular consisting of sending the newsletter and sms, as well as establishing a telephone conversation.</b>	Art. 6 clause 1 letter f of GDPR i.e. processing is necessary for the purposes of the legitimate interests consisting in the implementation of own marketing activities in connection with obtaining consent in accordance with TA and Act on Providing Services by Electronic Means.	IT service providers; Hosting providers; Entities supporting marketing, e.g. Getrisponde, Facebook, Google.	Until objection or withdrawal of consent expressed on the basis of TA and Act on Providing Services by Electronic Means.
<b>Establishment, investigation and defence of claims.  (applies to any person who has or may have a claim against the</b>	Art. 6 clause 1 letter f of GDPR i.e. processing is necessary for the purposes of the legitimate interests in establishing, investigating or	IT service providers; Hosting providers; Accounting company.	Until the prescription period for claims under civil law.

<b>administrator or against whom the administrator has or may have a claim)</b>	defending against claims.		
<b>Keeping statistics and profiling</b>	Article 6 clause 1 letter f of GDPR, i.e. processing is necessary for the purposes of the legitimate interests of the Administrator in collecting and using statistics to improve the scope and quality of services offered.	IT service providers; Hosting Providers  Statistics test tools suppliers, e.g. Google, Facebook, Hotjar;	Until objection.
<b>Exercise of the rights of persons under the GDPR.</b>	Article 6 clause 1 letter c of GDPR, i.e. a legal obligation arising from the GDPR consisting in accepting, considering and responding to the submitted request.	IT service providers; Hosting providers;  Law firms and consulting companies, e.g. DAPR	Until the prescription period for claims arising from the provisions of the personal data protection law.

## 7. Providing data

We receive all personal data from you and their provision or consent to their processing is voluntary. Failure to provide data will usually result in the inability to implement the action you want to take, e.g. sending an offer, answering a question, sending a newsletter.

In connection with the above:

- a) if you want to receive an offer or order cards, it is necessary to provide data in the order form

- b) if you want to receive an answer to a question in the contact form, it is necessary to provide data in the appropriate form;
- c) if you want to receive the newsletter, it is necessary to provide data in the newsletter form;

Providing data is necessary to receive a recording from the webinar or a report for free. In addition, due to the fact that the transmitted content is free, consent to marketing, although voluntary, is necessary.

Notwithstanding the foregoing, we may collect various analytical data, etc. related to your presence on the website. More information in this regard can be found in the "Cookies" tab.

## **8. Rights of data subjects**

Each person whose data is processed has a number of rights under the GDPR.

### **Opting out of email marketing (objection and withdrawal of consent)**

Any person may at any time opt out of receiving further commercial information via e-mail by clicking on link for resignation from receiving commercial information ("unsubscribe from receiving messages").

### **The right to request access to your personal data.**

Each person is entitled to obtain confirmation from the administrator whether personal data concerning him/her are being processed, and if this is the case, he/she is entitled to access them and a range of information.

We will provide the first copy of personal data subject under processing upon request free of charge. For any further copies requested by the data subject, we may charge a reasonable fee based on administrative costs. If you request a copy electronically and unless otherwise stated, we will provide information in a commonly used electronic form.

### **Right to rectification**

You have the right to request us to rectify any personal data that is incorrect. You also have the right to request the completion of incomplete personal data, including by providing an additional statement.

### **The right to request removal**



You have the right to request us to delete your data immediately, and we have the obligation to delete it without undue delay if one of the following circumstances applies:

- Your personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
- You have withdrawn the consent on which the processing is based and there is no other legal basis for further processing;
- You have objected to the processing and there are no overriding legitimate grounds for processing;
- Your personal data has been processed unlawfully;
- Your personal data must be deleted to comply with a legal obligation under Union or Member State law to which the administrator is subject;
- Your personal data has been collected in connection with offering information society services.

According to the GDPR, your personal data, despite a submitted request to delete them, may not be deleted if their processing is necessary:

- to exercise the right to freedom of expression and information;
- to comply with a legal obligation requiring processing under Union or Member State law to which the administrator is subject, or to perform a task carried out in the public interest or in the exercise of official authority vested in the administrator;
- for reasons of public interest in the field of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or for statistical purposes, provided that the right to delete data is likely to prevent or seriously impede the achievement of the purposes of such processing;
- to determine, pursue or defend claims.

### **Right to request restriction of processing**

You have the right to request the administrator to restrict processing in the following cases:

- you question the correctness of personal data - for a period allowing the administrator to check the correctness of this data;
- the processing is unlawful, and you object to the deletion of personal data, requesting instead to limit their use;

- the administrator no longer needs personal data for processing purposes, but you need it to determine, pursue or defend claims;
- You object to the processing - until it is determined whether the legitimate grounds on the part of the administrator prevail over the grounds of objection of the data subject.

### **Right to object**

You have the right to object at any time - for reasons related to a particular situation - to processing based on the legitimate interest of the administrator or if the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the administrator; including profiling based on these provisions.

In the event of an objection, we may no longer process personal data, unless there are valid legitimate grounds for their processing, overriding the interests, rights and freedoms of the data subject, or there are grounds for establishing, pursuing or defending claims.

### **Right to data transfer**

You have the right to receive in the structured, commonly used machine-readable format your personal data that you have provided to us, and you have the right to send such personal data to another administrator without any obstacles on our part if:

- processing takes place on the basis of consent or on the basis of a contract, and
- processing takes place in an automated manner.

The option of exercising the right to transfer data and sending it by the administrator directly to another administrator will be implemented if it is technically possible.

According to the GDPR, the exercise of your rights may not adversely affect the rights and freedoms of others.

### **The right to withdraw consent**

If your data is processed based on consent, you have the right to withdraw such consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

In the event of withdrawal of consent, we have the right to further process data if it is necessary:

- to exercise the right to freedom of expression and information;
- to comply with a legal obligation requiring processing under Union or Member State law to which the administrator is subject, or to perform a task carried out in the public interest or in the exercise of official authority vested in the administrator;
- for reasons of public interest in the field of public health;
- for archiving purposes in the public interest, scientific or historical research purposes or for statistical purposes, provided that the right to delete data is likely to prevent or seriously impede the achievement of the purposes of such processing;
- to determine, pursue or defend claims.

### **Right to lodge a complaint**

You have the right to lodge a complaint with the President of the Personal Data Protection Office. As indicated by the President of the Personal Data Protection Office, because the President of the Office is the body controlling the correct application of the provisions on the protection of personal data by the administrator, **the complainant should first contact the administrator to exercise his/her rights.**

Direct link to the website of the Personal Data Protection Office to file a complaint;

<https://uodo.gov.pl/pl/p/skargi>

### **9. Website security**

Please be advised that Edenred Sp. z o.o. [LLC] applies adequate technical and organizational measures to ensure the maximum level of protection for persons using the company's website.

Securing the integrity and confidentiality of personal data has been ensured, among others, by using transmitted data encrypted using the DV (Domain Validation) SSL protocol.

## 10. Cookies

We use technology that stores and gains access to information on a computer or other end device used by you and connected to the Internet, including cookies.

Cookies are small text information about how you use our website that is stored on your side. In order to build our offer, in a way that will be the closest to expectations, as part of running the platform, Edenred uses website analytics services provided by Google, Inc. Google Analytics application and Hotjar Ltd., Hotjar application. The above applications use cookies.

Data collected using cookies by Google Analytics (including the User's IP address) is transmitted to Google and stored by Google on servers in the United States. If the Services anonymize the IP addresses, the User's IP address will be truncated by Google in the territory of a Member State of the European Union or other European Economic Area country before this address is sent to the United States. Only in exceptional cases will the User's full IP address be sent to Google servers in the United States and truncated on the spot. Google will use this information to evaluate how the Website is used by the User, to compile reports on website traffic for website operators and to provide other services related to website traffic and internet usage. Google will not combine your IP address with any other data in its possession. Hotjar does not process Users' personal data. The information processed by Hotjar towards EU Users is to verify the IP address to determine whether the User is a unique user or has returned to the Website. Google Inc. Google Analytics application, Leadreactor Sp. z o. o. [LLC] Lead Reactor application, Hotjar Ltd. Hotjar application, Facebook Inc. Facebook applications, Twitter Inc. Twitter application, Instagram Inc. Instagram applications collect anonymous information, note trends on the website without identifying individual Users. Like many other services, Google Analytics, Hotjar, Facebook, Instagram and Twitter use their own cookies to analyse Users' actions. These files are used to store information, e.g. the time of commencement of current visits and whether the User has ever been to the address of the website, from which website he/she came to our website, what screen resolution his/her device is, what information he/she was interested in on our website, etc.

By using the website, the User consents to the processing of his/her data by Google in the manner and for the purposes set out above.

The User may by modifying the settings of his/her web browser, prevent the saving of cookies on the device he/she uses, or he/she may permanently delete saved files.

The User decides to process cookies through the web browser settings on the device he/she uses. Please be advised that implementing the restrictions on the use of technology set out above may adversely affect the functioning of the website.

In order to obtain detailed information on the Google Analytics' solution used, please click on the following link:

<https://support.google.com/analytics/answer/6004245>

### **Types of cookies or similar technologies used on the Edenred website**

<b>Type of cookies:</b>	<b>What are they for?</b>
Credentials	For identification, to display information relevant to the interests of the visitor.
Necessary for the website to function	Necessary for the proper functioning and display of the Edenred.pl website, allowing you to navigate the website and use its elements.
Functional	To remember settings and choices (e.g. username, region where you are, customized settings, language and communication preferences, user activity history) to provide you with more tailored content and services. Social plugins provide you with functions, important information and content tailored to your needs. In order to ensure the proper functionality of the Edenred website, data on the activity of Edenred.pl is used.
Marketing	To provide marketing content corresponding to your activity on Edenred websites, your interests, customs. To present a specific advertisement, data on the history of

	visited webpages, activity on websites, geolocation data and demographic data may be used. Marketing cookies also allow you to measure the effectiveness of advertising campaigns (e.g. by counting how many people clicked on a given ad and went to the advertiser's website).
--	--

**In addition, we would like to inform you that it is possible to configure cookies in individual browsers. Cookies can be restricted or blocked completely. We have included the configuration instructions below for each browser:**

[Internet Explorer](#)

[Microsoft Edge](#)

[Mozilla Firefox](#)

[Chrome](#)

[Opera](#)

[Safari](#)

## **11. Profiling**

Edenred uses your personal data in such a way that it profiles them, i.e. it processes your personal data in an automated manner to assess certain personal factors, in particular to analyse or forecast aspects of economic, personal preferences, interests, reliability, behaviour or location.

Profiling is designed to provide you with the most tailored marketing content so that you receive information that may actually interest you and match your profile and are not displayed abstractly without relevance to your needs.

Profiling is therefore intended to better match content, in particular marketing content, so that you receive marketing and commercial information that you are interested in and that will allow Edenred to present products and services that may encourage you further to cooperate.

## **12. Final Provisions**

Using the Edenred.pl website is completely voluntary.

Edenred Sp. z o.o. [LLC] reserves the right to change the Policy at any time due to the scope of services offered and to adapt it to the amended law. In each case, if possible, we will try to inform you about the update of the Policy before its introduction.

Last update of the Privacy Policy 13/09/2019.