

# Privacy and Personal Data Protection Policy

## Merchants.sodexo.be Plateform

The following information is provided to inform you of Pluxee Belgium's commitments regarding the protection of personal data. Pluxee Belgium belongs to the Pluxee Group (hereinafter "PLUXEE").

PLUXEE builds strong and lasting relationships with its clients, partners, customers and clients based on mutual trust: ensuring the security and confidentiality of their Personal Data is an absolute priority for PLUXEE.

PLUXEE is committed to comply with all applicable regulatory and legal provisions governing the protection of Personal data.

PLUXEE enforces a very strict privacy policy to guarantee the protection of the Personal data of those who use its websites, portals, applications, and platforms (our "Sites"):

- Each user remains in control of his data. They are treated in a transparent, confidential and secure manner
- PLUXEE is committed to a continuous approach to the protection of its users' data, in compliance with the law of July 30, 2018 on the protection of individuals with regard to the processing of Personal Data and the General Data Protection Regulation (EU) of April 27, 2016 (hereinafter "GDPR").
- PLUXEE has a dedicated personal data protection team, supported by a network of local data protection contact points or data protection officers.

For more information, please see our Global Privacy Policy.

## PURPOSE OF THIS POLICY

This policy is intended to apply to

- users of the website [www.merchants.sodexo.be](http://www.merchants.sodexo.be).

PLUXEE attaches great importance to the protection of your Personal Information.

We have developed this policy to inform you of the conditions under which we collect, process, use and protect your Personal Data on our Site and in connection with the services provided by PLUXEE BELGIUM SA , (the "Services"). This policy covers all users, including those who use the Site and Services without being registered or subscribing to a specific service or account (collectively, "Users"). Please read it carefully to learn what categories of Personal Information we collect and process, how we use that Personal Information and with whom we may share it. This policy also describes your rights and how you can contact us to exercise them or to ask any questions you may have about your Personal Information.

This Policy may be modified, supplemented or updated in order to comply with any legal, regulatory, jurisprudential and technical developments. However, your Personal Data will always be processed in accordance with the policy in effect at the time of collection, unless a mandatory legal requirement provides otherwise and is retroactive.

This Policy is part of the Terms of Use of the Site.

## IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

The person responsible for the processing of Personal Data is the limited liability company PLUXEE BELGIUM SA , whose registered office is located at 36, rue Ravenstein, 1000 Brussels and known under the company number BE 0403.167.335, legally represented by its general manager.

## DEFINITIONS

### "Account"

Personal space dedicated to the User of a Site, which he accesses when he registers and connects to the Site. It allows the User to access the Services.

<b>"Data Processor"</b>	The Pluxee entity that, alone or jointly with other Pluxee entities or third parties, determines the purposes and means of processing personal data.
<b>"Cookies"</b>	As defined in the Cookies Policy.
<b>"Personal Data"</b>	Any information relating to a natural person who is identified or can be identified, directly or indirectly, by reference to an identification number or to one or more elements specific to him.
<b>"Treatment"</b>	Any operation or set of operations which may or may not be performed upon personal data or sets of personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, limitation, erasure or destruction.
<b>"Subcontractor"</b>	The natural or legal person who processes personal data on behalf of the Data Controller.
<b>"Site"</b>	The <a href="http://www.merchantssoeasy.sodexo.be">website www.merchantssoeasy.sodexo.be</a> belonging to Pluxee Belgium SA.
<b>"We" or "Our"</b>	Pluxee Belgium SA (hereafter "Pluxee ").
<b>"You" or "Users"</b>	Any user/visitor of the Site.
<b>"Digital Forms"</b>	Pluxee Lunch , Pluxee Eco , Pluxee Gift , Pluxee Sport & Culture , Pluxee Book, Pluxee Consumption or any other vouchers provided

by Pluxee , whether issued in paper or electronic form.

## **COLLECTION & ORIGIN OF PERSONAL DATA**

We may collect your Personal Data directly (in particular via the collection forms available on our Site) or indirectly (via our subcontractors).

We undertake to obtain your consent and/or to allow you to object to the use of your data for certain purposes, as soon as this is necessary.

In all cases, you will be informed of the purposes for which your data is collected via the various online data collection forms and via the Cookie Management Policy.

## **TYPES OF PERSONAL DATA WE COLLECT AND USE, PURPOSES, LEGAL BASIS AND RETENTION PERIODS**

We may collect and process the following types of Personal Data in particular:

- information you provide by filling out forms on the Site (e.g., for registration purposes, participation in surveys, marketing purposes, etc.);
- information you provide for authentication purposes;
- information you provide for order fulfilment or to provide a service;
- information about your purchases such as products, quantity, price, billing and delivery addresses;
- transaction data such as payment information and credit/debit card information that is transmitted directly to third parties who process your requests;
- your preferences for receiving commercial/marketing information from us and our third parties and your communication preferences;
- information collected via cookies as defined in our Cookie Policy.

The Personal Data identified by an asterisk in the collection forms are mandatory because they are necessary for the processing of the request made. If you do not fill in this mandatory information, these operations cannot be taken into account.

Please find the details of the different data collected for the different purposes in the table (Annex 1).

## **PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL DATA**

Personal data may be collected for the following general purposes (a more precise description of the processing of your data can be found in Annex 1 below):

- Site and application management
- Commercial management
- Customer relationship management

Please note, you have the option of clicking on the Twitter, Facebook, LinkedIn etc. social network icons on our Sites.

When you click on these icons, we may have access to the Personal Data you have indicated as public and accessible from your profiles on the relevant social networks. However, we do not create or use any database independent of these social networks from the Personal Data you may post on them and we will not process any of your personal data through them

If you do not want us to have access to the Personal Data published on the public area of your social profiles or accounts, you should use the means made available to you by the social networks concerned in order to limit access to this data.

These links to other websites should not be considered as a follow-up of navigation and we decline any responsibility concerning the Protection of Personal Data implemented by these third party companies, each acting as a separate Data Controller of your Personal Data on their own perimeter. Once you leave our Site or click on the logo/link to one of these social networks, it is your responsibility to check the privacy policy applicable to that other platform.

## **LEGAL BASIS FOR PROCESSING PERSONAL DATA**

We process your Personal Data in the context of the performance and management of our contractual relationship with you, our legitimate interest in improving the quality and operational excellence of the Services we offer you or to comply with certain regulatory obligations according to the purpose of the processing as identified in the table in Appendix 1.

The processing of your Personal Data may also be carried out on the basis of your prior consent in the event that you are asked for it in certain situations (for example concerning health data or for certain types of Cookies).

Please find more information on the legal basis for each of our processing operations in Appendix 1 below.

## COMMUNICATION OF PERSONAL DATA

The security and confidentiality of your Personal Information is of great importance to us. For this reason, we restrict access to your Personal Data to members of our staff only to the extent strictly necessary to process your request or provide you with the requested Service. We ensure that the persons authorized to process Personal Data have undertaken to respect confidentiality or are subject to an appropriate legal obligation of confidentiality.

We do not disclose your Personal Information to unauthorized third parties. We may, however, share your Personal Information with entities within PLUXEE and authorized service providers that we use for the purpose of providing our services.

These providers include:

- The IT service providers responsible for the hosting and maintenance of the Site;
- The service provider responsible for the production of the Pluxee Card ;
- The service providers responsible for processing the data necessary for the execution of the transactions;
- Service providers in charge of controlling the quality of services (call center);
- The service provider responsible for the direct mail service on behalf of PLUXEE ;
- Pluxee 's legal, financial and accounting advice.

We ensure that each disclosure of your Personal Data to an approved service provider is governed by a data processing agreement, reflecting the commitments set out in this Policy.

We do not authorize these service providers to use or disclose your data except to the extent necessary to perform the Services on our behalf or to comply with legal obligations. In addition, we may share Personal Data (i) if we are required to do so by law or legal process, (ii) in response to a request from public authorities or other officials, or (iii) if we believe that the provision of such data is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual illegal activity.

## RETENTION PERIOD OF YOUR PERSONAL DATA

We will retain your Personal Data for no longer than is necessary for the purposes for which it is collected and processed, extended, where applicable, by the duration of applicable legal or regulatory requirements.

To determine the length of time we retain your Personal Data, we take into consideration several criteria such as:

- The purpose for which we retain your Personal Information (for example, when you purchase products on our Site, we retain your Personal Information for the duration of our contractual relationship);
- Our legal and regulatory obligations regarding such Personal Data (e.g., accounting reporting obligations);
- If you are an active user of our Services, if you continue to receive commercial/marketing communications, or if you regularly browse or purchase from our Site or do not open our emails or visit our Site. For example, if you have agreed to receive marketing communications, we retain your Personal Data until you: (i) unsubscribe from receiving marketing communications (ii) request that we delete your Personal Data, or (iii) after a period of inactivity (i.e., when you have not interacted with us for a period of time). This period is defined in accordance with local regulations and guidelines;
- Any specific request from you regarding the deletion of your personal data or your account;
- Any statutory limitation periods that allow us to manage our own rights, such as the defense of any legal claim in the event of litigation; and
- Any local regulations or recommendations (for example, regarding cookies).

Please find more information on how long we keep your personal data in Appendix 1 below.

## **SENSITIVE PERSONAL DATA**

In general, we do not collect sensitive Personal Information. Sensitive Personal Data" is any information concerning the racial or ethnic origin, political opinions, religion or philosophical beliefs, trade union membership, health data, or data concerning the sex life or sexual orientation of a natural person. This definition also includes Personal Data relating to criminal convictions and offences.

In the event that the collection of such Data is strictly necessary to accomplish the purpose of the processing, we will do so in accordance with the requirements of local legislation on the protection of Personal Data and, where applicable, with your prior explicit consent and under the conditions described in this Policy.

## **PERSONAL INFORMATION AND MINORS**

Pluxee 's services and the Site are intended for persons of legal age who are capable of entering into obligations under the laws of the country in which you are located.

Users under the age of 16 or who are otherwise incapacitated must obtain the prior consent of their legal guardian before entering their Personal Data on the Site. The age limit may be different depending on the local legislation of your usual residence.

## TRANSFERS OF PERSONAL DATA

Given the international nature of the Pluxee group, your Personal Information may be transferred to recipients, internal to the Pluxee group or external, authorized to perform services on our behalf who may be located in countries outside the European Union or the European Economic Area that do not offer an adequate level of protection for Personal Information.

In order to guarantee the security and confidentiality of the Personal Data thus transferred, we take all necessary measures to ensure that such data is adequately protected, such as entering into data transfer agreements with the recipients of your Personal Data based on the signing of European Commission Standard Contractual Clauses ("SCCs") or any other valid transfer mechanisms and we carry out in accordance with the decision of the Court of Justice of the European Union of July 16, 2020 "Schrems II" (case C 311-18) and with the advice of the European Data Protection Committee, a risk assessment of the transferred data. If you would like to receive a copy of the safeguards in place to secure data transfers outside the European Economic Area, please see the "How to Contact Us" section.

## YOUR RIGHTS

PLUXEE is committed to facilitating the exercise of your rights in accordance with the applicable regulations. You will find below a table summarizing the different rights you have:

<b>RIGHT OF ACCESS</b>	<p>You may request access to and a copy (if reasonable) of the Personal Data we have on file. You may also request that inaccurate Personal Data be corrected or that incomplete Personal Data be completed.</p>
<b>RIGHT TO ERASURE / RIGHT TO BE FORGOTTEN</b>	<p>Your right to be forgotten allows your Personal Data to be deleted when:</p> <ul style="list-style-type: none"> <li>(i) the Personal Data is no longer necessary for the purposes for which it was collected;</li> <li>(ii) you decide to withdraw your consent;</li> <li>(iii) you object to the Processing of your Personal Data;</li> <li>(iv) your Personal Data has been processed unlawfully;</li> </ul>



	<ul style="list-style-type: none"> <li>(v) your Personal Data must be deleted to comply with a legal obligation;</li> <li>(vi) their erasure is mandatory to ensure compliance with applicable law.</li> </ul>
<p><b>RIGHT TO LIMIT THE PROCESSING</b></p>	<p>You may request to limit the Processing when:</p> <ul style="list-style-type: none"> <li>(i) you dispute the accuracy of your Personal Data;</li> <li>(ii) Pluxee no longer needs your Personal Data for the purposes of the Processing;</li> <li>(iii) you have objected to the Processing on legitimate grounds.</li> <li>(iv) the Processing of your Personal Data is unlawful and you prefer the restriction of its use rather than its deletion</li> </ul>
<p><b>RIGHT TO DATA PORTABILITY</b></p>	<p>If applicable, you may request the portability of your Personal Data that you have provided to PLUXEE in a structured, commonly used and machine-readable format, and have the right to transmit such Personal Data to another Controller without PLUXEE 's interference, when:</p> <ul style="list-style-type: none"> <li>a. the Processing of your Personal Data is based on your consent or on an existing contractual relationship; and</li> <li>b. the Processing is carried out using automated processes.</li> </ul> <p>You also have the right to have your Personal Data transmitted directly to a third party of your choice (where technically possible).</p>
<p><b>RIGHT TO OBJECT</b></p>	<p>You have the right to object ("opt out") to the Processing of your Personal Data (including profiling or marketing communications). Where we Process your Personal Data on the basis of</p>

	<p>your consent, you may withdraw your consent at any time.</p>
<p><b>RIGHT NOT TO BE SUBJECT TO AUTOMATED DECISIONS</b></p>	<p>You have the right not to be subject to a decision based exclusively on automated processing, including profiling, which produces legal effects concerning you or significantly affects you in a similar way.</p>
<p><b>RIGHT TO LODGE A COMPLAINT</b></p>	<p>You may decide to lodge a complaint with the Data Protection Supervisory Authority of the country of your habitual residence. For Belgium this is the Data Protection Authority (DPA, 1000 Brussels, Rue de la Presse 35 - <a href="mailto:contact@apd-gba.be">contact@apd-gba.be</a>).</p> <p>You also have the right to take legal action before the courts of the country in which the PLUXEE entity has an establishment or of the country where you have your habitual residence.</p>

You may, at any time, exercise any of the rights listed above or you may contact us with any questions or concerns related to data protection by filling out the request form as indicated in the privacy notices and/or privacy policies provided to you at the time of collection of your Personal Data or by sending them to the local Data Protection Contact Point at [privacy.be@pluxeegroup.com](mailto:privacy.be@pluxeegroup.com).

For more information, we invite you to consult the Local Data Protection Rights Management Policy.

## SECURITY

We implement all technical and organizational measures to ensure the security and confidentiality of the processing of Personal Data.

In this respect, we take all necessary precautions, in view of the nature of the Personal Data and the risks presented by the processing, to preserve the security of the data and, in particular, to prevent them from being distorted, damaged or accessed by unauthorized third parties (physical

protection of the premises, authentication procedures with personal and secure access via confidential identifiers and passwords, logging of connections, encryption of certain data, etc.)

In addition, if we contract with Subcontractors for all or part of the Processing of your Personal Data, we require a contractual agreement from our service providers to guarantee the security and confidentiality of the Personal Data that we transmit to them or that they collect on our behalf, in accordance with the applicable regulations on the protection of personal data.

We regularly conduct audits to verify the proper operational application of the rules relating to the security of your Personal Data.

However, you are also responsible for ensuring the security and confidentiality of your Personal Information, so we urge you to remain vigilant, especially when using an open system such as the Internet.

You agree to keep your password and access code secret and confidential. Any use of the identification elements is made under your entire responsibility. In the event of loss or theft or fraudulent use of any of these elements, you are required to notify Pluxee in writing as soon as possible. You will not be liable until the business day following the day on which you receive such notification.

## **LINKS TO OTHER SITES**

We occasionally provide links to other platforms for your convenience and information. These platforms operate independently of our sites and are not under our control. These platforms may have their own privacy notices or terms of use, which we strongly suggest you review. We are not responsible for the content of these sites, the products and services that may be offered on them, or any other use.

## **UPDATING OUR PRIVACY POLICY**

We may update or modify this Privacy Policy from time to time. If we do so, the changes will only be effective after 30 business days from the date of the change. Check this page periodically if you wish to monitor any changes.

## **UNSUBSCRIBE**

If you have subscribed to certain services through our Site and do not wish to receive future emails, please visit the unsubscribe page for the service you have subscribed to.

## **HOW TO CONTACT US**

If you have any questions or comments regarding this policy, please feel free to contact your local Data Protection Contact via the web form or email address [privacy.be@pluxee.com](mailto:privacy.be@pluxee.com).

**Last update:** 25.01.2024

Annex 1:

## INFORMATION ON THE PROCESSING OF YOUR PERSONAL DATA

Processing relating to the issue and management of Vouchers via the Site.

General purpose	Purpose of processing	Personal data collected	Legal basis of the processing	Retention of Personal Data
<b>Site and application management</b>	For more information on the treatment of your Personal Data in the specific context of Cookies we invite you to consult our Cookies Policy			
<b>Commercial management</b>	Management of payment terminals	Company details (name, points of sale, company number, address, phone number, email address) and contact person (name, first name, email address)	The provision and processing of this Personal Data is necessary for PLUXEE to fulfil its contractual obligations	The data is kept up to five (5) years after the end of the contractual relationship
	Inform the merchant of his balance and transaction history	Data relating to transactions, payments made on the basis of the Notes and refunds made by Pluxee	Legal obligations of PLUXEE regarding the management of the Securities	Accounting data is kept for at least seven (7) full fiscal years
<b>Merchant relationship management</b>	Notify us of any changes in Pluxee 's terms and conditions and/or policies	Identifying information such as your first and last name, your contact information (e-	Legal obligations of Pluxee regarding the management of the Securities	We keep the data for a period that corresponds at most to the retention period of the invoices

	mail), your language		(which indicate any changes in the conditions)
For any other purpose that we may specify at the time of collection of your data	The type of data will also be specified at the time of collection	Specified at time of collection	Specified at time of collection
Respond to your requests (especially via the contact form)	Company details (name, point of sale, company number, address, phone number, email address)	Legitimate interest of PLUXEE to ensure the quality of its services and to promote them	Up to three (3) years after the last contact

**Pluxee Belgium sa**

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