

## **Edenred Privacy Policy**

Version 4.4 (22/05/2018)

### **About Edenred**

Edenred (UK Group) Limited & Childcare Vouchers Ltd, (together "Edenred/we/us/our") are companies incorporated in England & Wales with a registered office at 50 Vauxhall Bridge Road, London, SW1V 2RS. The registered company number for Edenred UK (Group) Limited is 00540144. The registered company number for Childcare Vouchers Limited is 02420196.

This Privacy Policy describes how Edenred collects, processes and uses your personal information.

We are committed to protecting the confidentiality and security of your personal information in accordance with applicable data protection legislation. To achieve this we have policies and procedures in place to comply with the General Data Protection Regulation (also known as the GDPR) and other applicable UK and EU regulations.

Edenred reserves the right to change its Privacy Policy at any time without notice. We advise that you occasionally review the current version. Where possible we will notify you if significant changes are made.

If you have any questions about this Privacy Policy please contact us by email at [dpo.uk@edenred.com](mailto:dpo.uk@edenred.com) or in writing to The Information Security & Compliance Officer, Edenred UK (Group), 50 Vauxhall Bridge Road, London, SW1V 2RS.

### **Why does Edenred need to collect and store your personal information?**

Edenred collects, stores and processes your personal information on behalf of our clients for the purpose of administering our various services such as:

- Childcare Vouchers
- Employee Savings
- Eyecare Vouchers
- Flexible Benefits
- Incentive Award Cards
- Luncheon Vouchers

We are committed to ensuring that the information we collect and use is appropriate for its proposed purpose, and does not constitute an invasion of your privacy. Edenred will only use the information you provide in a manner that is compatible with applicable data protection legislation. At all times we will endeavour to keep your information accurate and up to date.

If you do not have a commercial relationship with us, we may hold limited personal information about you to communicate and promote our services.

Unless stated otherwise, our current Privacy Policy applies to all the personal information we obtain from or about you.

## **Personal information collection & use**

When providing our services, we may obtain personal data when;

- Your employer (or other organisation with which you are formally affiliated) passes your personal information to us for the provision of services they have purchased on your behalf; or
- You provide your personal information to Edenred whilst using the service; or
- You provide your personal information when requesting more information about becoming a client of Edenred

The personal information collected by Edenred is restricted to information essential for service operation and does not include sensitive personal information.

This information is collected to allow us to:

- Create and manage your account on our website services
- Process your requests for accessing discreet elements of our service such as purchasing employee savings discounts; making flexible benefits choices; or redeeming incentive awards given to you by your employer or affiliated organisation
- Run marketing campaigns to communicate and promote our services
- Service the contract we have with you, your employer or affiliated organisation

## **Personal information data retention periods**

We will not retain your personal information for longer than is necessary. However in some instances the law sets the maximum length of time personal data must be retained to satisfy any legal, accounting, or reporting requirements.

When your employer or affiliated organisation ceases to be an Edenred client we will retain and securely destroy your personal information in accordance with applicable laws and regulations. After the retention period has elapsed, data is securely destroyed or anonymised so that it can no longer be associated with you.

## **Lawful basis for processing your information**

Wherever possible, your personal data will not be obtained, held, used or disclosed unless you have been informed (and where required given your consent) for it to be shared with Edenred. Your employer or affiliated organisation is responsible for taking the necessary steps to achieve this. For the purposes of applicable Data Protection Laws, Edenred is a data processor of your personal data, your employer or affiliated organisation is the data controller.

Edenred will only use your personal information to perform our contractual obligations with you, your employer or affiliated organisation and to pursue our legitimate interests delivering, maintaining and promoting the required service. Should the need arise we may also be required to use your personal information to comply with our legal and regulatory obligations.

## **Marketing & electronic communications**

From time to time we may contact you via email or telephone with information about Edenred products and services. As follows:

**Existing users:** Your employer or affiliated organisation will have determined the initial extent to which Edenred can communicate with you using either your business or personal contact information. This means that our lawful basis for communicating with you can vary between;

- Edenred performing our contractual obligations with you, your employer or affiliated organisation. For example when sending you service notifications such as joining instructions; or
- pursuing our legitimate interests. For example when sending promotional emails to your work email address; or
- relying on your consent. For example when sending promotional emails to your personal email address.

Whichever method is used we will always provide you with the option to opt-out of receiving future communications. With the following exception; occasionally your employer or affiliated organisation will ask Edenred to communicate with all its employees or scheme members providing a notice that is required to be sent to all participants concerning essential information about the provided service in accordance with our contractual obligations.

**Direct marketing to corporate clients & prospects:** We will communicate with you to pursue our legitimate interests in promoting our products and services. We will always provide you with the option to opt-out of receiving future communications.

Please note the grounds and purposes for processing your personal information may overlap which could result in several of those grounds justifying our usage.

### **Keeping you informed**

In the interest of continually improving our services, we may occasionally wish to contact you by email or telephone to inform you about services or offers which might be of interest to you, or to obtain your feedback on our services.

If you have received something in error please contact [clientservicesdirector@edenred.uk.com](mailto:clientservicesdirector@edenred.uk.com) and we will remove you from our mailing list(s). We will provide an unsubscribe option on all relevant marketing communications.

### **Sharing personal information with third parties**

Edenred may need to supply data to third parties for the purpose of providing the service purchased by your employer or affiliated organisation and to promote our products and services to existing and potential new clients. For example:

- Employee benefits providers
- Printing & mailing companies
- Email service providers
- Website tracking & analytics providers

We require third parties to safeguard the security of your data in accordance with applicable data protection laws. All Edenred third party service providers are required to take appropriate security measures to protect your personal information. Edenred will only share the minimum personal information required to provide the third party service. Third parties are only allowed to use your personal data for provision of that service.

## **Disclosure of personal information**

Edenred will ensure that your personal information is not disclosed to unauthorised third parties, including family members, friends, government bodies, and in certain circumstances, the Police. Edenred will not sell, rent or trade your personal data. Data protection legislation does however permit certain disclosures without consent when the information is requested for one or more of the following purposes:

- To safeguard national security
- Prevention or detection of crime including the apprehension or prosecution of offenders
- Assessment or collection of tax duty
- Discharge of regulatory functions (includes health, safety and welfare of persons at work)
- To prevent serious harm to a third party
- To protect the vital interests of the individual, this refers to life and death situations

All requests to provide personal data for one of the above reasons will be specifically authorised by the Edenred Information Security & Compliance Officer.

## **Rights of access to your personal information**

Under the General Data Protection Regulation and subject to qualifying circumstances you have the following rights:

- You can request a copy of personal data which we hold about you (commonly known as a subject access request or SAR). Subject Access Requests should be made in writing, using the application form accessible from this [web page](#). Two forms of personal identification must be provided with each request. Full details are contained within the SAR application form.
- You can request to have any inaccuracies in your personal information corrected.
- Under certain circumstances you can request to have your personal information removed.
- You can object to the processing of your personal information if you have issues with the content of the information we hold or how we are processing it.
- You can request that a restriction be placed on the processing of your personal information.

For assistance in exercising any of the above rights, please contact Edenred with details of your request by emailing [dpo.uk@edenred.com](mailto:dpo.uk@edenred.com) or in writing to the Information Security & Compliance Officer, Edenred UK (Group), 50 Vauxhall Bridge Road, London, SW1V 2RS.

## **Security of your personal information**

We have implemented stringent security measures to ensure the integrity & confidentiality of your personal information and to protect it from loss, misuse, alteration or destruction. Wherever you communicate with our data processing systems, the communication will be encrypted using SSL / TLS validated by our Extended Validation SSL certificates.

Edenred UK personnel who handle personal data are made aware of their responsibilities and are trained in how to protect the data. Each Edenred UK contract of employment specifically includes provision for the confidential handling of customer information.

Edenred have procedures in place to investigate a suspected data security breach. We will notify your employer or affiliated organisation if you have been affected as well as assisting the

data controller with reporting data breaches to the relevant regulatory authority to comply with our legal obligations.

### **Supplier and third party links**

Edenred UK may provide you with hyperlinks from our websites to third party websites. By following such hyperlinks, you become a customer of that third party supplier, in which case related transactions are subject to the third party's own privacy policy. Please ensure you read the privacy policy provided by any third party.

Edenred UK accepts no responsibility or liability for any third party websites.

### **Complaints**

If you have concerns about how we are processing your personal information or you wish to make a complaint please contact us by emailing [dpo.uk@edenred.com](mailto:dpo.uk@edenred.com). You are also entitled to contact the Information Commissioner Office's helpline for advice on data protection and your information rights here <https://ico.org.uk/global/contact-us/> or call them on 0303 123 1113.

### **Cookie Policy**

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A cookie is a small piece of data containing a unique reference which is written to a web-enabled user device such as a computer, smartphone, tablet and/or other device running a web browser capable of connecting you to the internet. For more information on cookies visit: [www.allaboutcookies.org](http://www.allaboutcookies.org).

Edenred UK uses cookies, where necessary, for the provision or enhancement of our web services.

### **What types of cookies do we use?**

'Session cookie': This is a temporary cookie that remains active until you sign-out of the website or the cookie expires due to a period of inactivity. The session cookie is essential in the provision of certain services.

'Persistent cookies': These remain on your device for a longer period, dependent upon their intended purpose. Our websites utilise two forms of persistent cookie:

- Stored on your device after you login to a website and expires after 60 days. This cookie is used to provide site branding and other website customisations where appropriate
- Stored on your device if you have given your consent on that website to have the website remember your details

'Web beacons'. These are small transparent graphical images which are used only where relevant to the related service.

'Analytics cookies': These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

Our policy is to be open and honest with you about our use of cookies.

## **Cookie security**

- Our cookies never contain Personally Identifiable Information (PII)
- Our cookies are always sent over an encrypted channel (SSL/TLS)
- The values inside our cookies are encrypted when necessary
- We never share or allow third parties to read our cookies

## **Third party cookies**

Edenred UK may embed video or other content into our websites.

When you visit a web page with embedded content you may be presented with cookies related to that content. Edenred UK does not control these cookies and we recommend that you check the third party's own website for information about them.

Video embedded into the website will not play automatically. By clicking on the play button for any embedded video you consent to a cookie (if applicable) being stored on your device.