

VERSION OF: May, 2024

1. ABOUT US

- 1.1. This Privacy Policy (the "Privacy Policy" or the "Policy") explains the manner in which we, Edenred Bulgaria, a joint stock company, organized and existing under the laws of Bulgaria, Unified Identification Code (UIC) 130526402, having its registered seat and address of management at 1784, Sofia, Bulgaria, 90, Tsarigradsko Shausse Blvd, 23rd floor, (hereinafter referred to as "**Edenred**", "**we**" or "**us**"), process personal data regarding the usage of the Edenred+ website or mobile application (hereinafter both referred to as the "**Platform**"), where corporate clients (hereinafter referred to as "**Client(s)**", "**Company(ies)**" or "**Employer(s)**") and beneficiaries (hereinafter referred to as "**User(s)**" or "**Employee(s)**") regulate and use the provided Edenred+ benefits.
- 1.2. We invite you to carefully read this Privacy Policy in order to be properly informed about the way Edenred Bulgaria, as a personal data controller, processes your data and respects your rights as data subjects.
- 1.3. Any terms used in this Policy that coincide with the terms set out in Regulation (EU) 2016/679 of the European Parliament and of the Council dated 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the General Data Protection Regulation, or simply the "**GDPR**") will have the meaning attributed to them in the GDPR.
- 1.4. By using the Edenred+ Platform and related services and in accordance with this Policy both Clients and Users declare that they are duly informed about the processing of their personal data by Edenred, enterprises of the Edenred group or other enterprises, which are services providers to Edenred, for the purposes of optimal use and quality provision of the services.
- 1.5. For any of the rights and obligations concerning personal data processing on the Edenred+ Platform, not expressly covered by this Policy, the mandatory legal provisions of the GDPR and the Bulgarian laws will apply accordingly.

2. DATA WE COLLECT

2.1. COLLECTION OF EMPLOYER DATA

2.1.1. We collect the following data categories of our Client's representatives who have been granted access to the Edenred+ Platform:

- **Data provided by the EMPLOYER such as:**
 - **Company data:** representative and authorized person(s) full name, professional e-mail address, work title, phone number, name and address of the represented Company.
 - **Financial data:** financial information, including bank account number, billing contact email address, and VAT number.
 - **Operational data:** number of employees who will be granted Edenred+ benefits, their names, their professional/personal e-mail addresses, and their birthdates, and/or internal employee number.
 - **Public Data:** publicly available data processed in order to create a more complete Client profile and provide better customer support.
- **Automatically collected data regarding each visit to the Platform such as:**
 - **Technical Data:** technical information, including Internet protocol (IP), login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, and other online performance data which may be subject to analytics software.
 - **Usage Data:** information regarding the visit to the Platform, including the full Uniform Resource Locators (URL), clickstream to, through, and from our Platform (including date and time), viewed or searched for benefits, page response times, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and the phone numbers used to contact us.

2.2. COLLECTION OF USER DATA

2.2.1. We collect the following data of the Users who access to the Edenred+ Platform:

- **Data provided by the User such as:**
 - **Identity data:** date of birth, personal/professional email and phone number.

- **Location data:** current location when using Edenred+
- **Transactional data:** transactions performed by using the provided Edenred+ benefits. This information is not shared with the Employer.
- **Automatically collected data regarding each visit to the Platform such as:**
 - **Technical Data:** technical information, including Internet protocol (IP), login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, and other online performance data which may be subject to analytics software.
 - **Usage Data:** information regarding the visit to the Platform, including the full Uniform Resource Locators (URL), clickstream to, through, and from our Platform (including date and time), viewed or searched for benefits, page response times, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and the phone numbers used to contact us.

3. HOW WE PROCESS COLLECTED DATA

We will only use the collected personal data in a lawful manner. We have set out below a description of the ways we use the collected personal data of both Clients and Users and the legal bases we rely only on to do so. We have also identified our legitimate interests where appropriate:

3.1. PROCESSING CLIENT DATA

Data processing activity	Purpose	Type of data	Legal basis for processing
Client's authentication management	To enable access to the Platform in order to perform the contract and ensure payment security and front-end web protection	Company data Technical data Usage data Public data	Performance of a contract
Analytics and audience measurement	Obtain information about the navigation of visitors on the Platform,	Technical data Usage data	Consent /by adjusting the settings in

	through audience measurement tools, to understand how Clients navigate towards the website and to find out about their journey.		the Cookie banner/
Analytics of Client journey	To improve the overall Client experience by analyzing the specific stages of the Client journey on the Platform.	Company data Technical data Usage data	Legitimate interest
Marketing management	Sending marketing messages to Clients or through different means promoting Edenred products and services This covers marketing messages relating to products and services proposed by Edenred Sending marketing messages promoting the products and services of Edenred partners	Company data Technical data Usage data Public data	Consent /by ticking a check box/
Client management	Case and account management and follow-up; Performance of studies, satisfaction surveys and polls (statistics and supervision) relating to the Client; This data processing activity is performed only on onboarded Clients	Company data Operational data Technical data Usage data	Performance of a contract
Provision of services	To provide our services by performing obligations arising from any contracts entered between the Client and us.	Company data Financial data Operational data Public data	Performance of a contract

Payment management	To manage payments, fees, and charges and to collect and recover money owed to us.	Company data Financial data Public data	Performance of a contract; Legitimate interests (when recovering debts due)
Fulfilment of legal obligations	In order to comply with different legal obligations, we might be required to process collected personal data from the Client	Company data Technical data Usage data Public data Operational data Financial data	Legal obligation

3.2. PROCESSING USER DATA

Data processing activity	Purpose	Type of data	Legal basis for processing
User authentication management	To enable access to the Platform in order to perform the contract and ensure payment security and front-end web protection	Identity data Technical data Usage data	Performance of a contract
Analytics and audience measurement	Obtain information about the navigation of visitors on the Platform, through audience measurement tools, to understand how Users navigate towards the website and to find out about their journey.	Technical data Usage data	Consent /by adjusting the settings in the Cookie banner/
Analytics of User journey	To improve the overall User experience by analyzing the specific stages of the User journey on the Platform.	Identity data Technical data Usage data	Legitimate interest

Marketing management	<p>Sending marketing messages to Users or through different means promoting Edenred products and services. This covers marketing messages relating to products and services proposed by Edenred.</p> <p>Sending marketing messages promoting the products and services of Edenred partners</p>	<p>Identity data</p> <p>Technical data</p> <p>Usage data</p>	<p>Consent /by ticking a check box/</p>
User management	<p>Case and account management and follow-up;</p> <p>Performance of studies, satisfaction surveys and polls (statistics and supervision) relating to the User;</p> <p>This data processing activity is performed only on onboarded Users</p>	<p>Identity data</p> <p>Technical data</p> <p>Usage data</p>	<p>Performance of a contract</p>
Provision of services	<p>To provide our services by performing obligations arising from the applicable terms & conditions concluded between the User and us.</p>	<p>Identity data;</p> <p>Transactional data</p>	<p>Performance of a contract</p>
Individualization of personal Edenred+ account	<p>To uniquely individualize each personal Edenred+ account we process the provided operational data from the Employer and Identity data provided by the User</p>	<p>Operational data provided by Employer</p> <p>Identity data</p>	<p>Performance of a contract</p>
Individualization of personal Edenred+ plastic card	<p>To print out the first and last name of the User on the Edenred+ plastic card</p>	<p>Operational data provided by Employer</p>	<p>Performance of a contract</p>

Transaction analytics and measurement	To analyze and measure how the Edenred+ benefit is used	Transactional data	Legitimate interest
Merchant locator	Display merchants who are part of the Edenred Network located in the User's surrounding area.	Location	Consent
Fulfilment of legal obligations	In order to comply with different legal obligations, we might be required to process collected personal data from the User	Operational data provided by Employer Identity data Technical data Usage data	Legal obligation

4. HOW WE DISCLOSE COLLECTED DATA

4.1. On a case by case basis, we can disclose the collected personal data, exclusively for the processing purposes to:

- a)** the companies that are part of the Edenred group;
- b)** our service suppliers (acting as joint data controllers, data processors, or as persons empowered by us) and which we contract for the administrative and processing services of our transactions, for marketing, other services suppliers (e.g., the company producing Cards, suppliers of payment services, courier companies, suppliers of IT services);
- c)** market research agencies carrying out market studies for us;
- d)** other companies and enterprises with whom we can develop joint programs of offers on the market of our products and services;
- e)** public authorities, if the disclosure is necessary in order to comply with an obligation provided for by the applicable legislation;

4.2. The transmission of the collected personal data to the above-mentioned recipients will be done only based on a confidentiality commitment and a commitment to ensure the adequate level of security by such recipients, guaranteeing that the personal data is kept safe, and its transmission is carried out in accordance with the legislation in force. In cases where the transmission of

the collected personal data is subjected to an international transfer, the transfer shall be performed only via the instruments exhaustively listed in the GDPR.

We can provide you with a full list of our partners to whom your personal data is shared if you request so.

5. DURATION OF THE PROCESSING

5.1 In general, we will process the collected personal data as much as it is necessary for the processing purposes mentioned above, except for in the situations in which the legal provisions foresee or oblige us otherwise. Therefore:

- Regarding commercial communications sent by Edenred or its partners, we will keep the collected email addresses or phone numbers in the data base as long as its subscription is active; from the moment we receive an unsubscribe request, we will deactivate the sending option of such notices;
- Regarding the created online accounts on the Platform, we will keep the personal data as long as the account is active and after, during the period necessary to evidence the operations carried out through the account; If the option to deactivate the User or Client account is chosen, Edenred will interpret such an action as a wish to unsubscribe from receiving commercial communications by which we provide updates about our offered products and Services. Nevertheless, deactivating the account will not automatically lead to deleting the collected personal data. In order to delete the collected personal data or exercise any other data privacy right, please refer to article 6 below.
- Regarding the contact form and the form to request a customized offer, we will keep the collected personal data during the period necessary to provide answers to messages and requests and evidence the correspondence carried out with both Clients and Users;
- regarding the performance of analysis on the navigation on the Edenred+ platform and interactions with the Edenred Websites, we will keep data for a period of up to 3 years;

5.2 Edenred may delete all the collected personal data when we consider that it is no longer necessary for the purposes for which it was collected.

5.3 In any case, if approval is withdrawn and there are no legal grounds for processing or the processing is opposed and there are no legitimate reasons for

the processing of the collected personal data that would prevail, we will stop processing the data.

6. DATA PRIVACY RIGHTS

6.1 Both Clients and Users have the following rights regarding their collected personal data:

- a) The right to request and receive access to the collected personal data.**
- b) The right to obtain confirmation from Edenred that it processes the collected personal data**, as well as information regarding the specifics of the processing, such as the purposes of the processing, the categories of personal data concerned, the recipients to whom personal data will be disclosed, the envisaged period for which the personal data will be stored, if possible, etc.,
- c) The right to request rectification (modification) or deletion of the data** or restricting the processing,
- d) The right of erasure ('right to be forgotten'),**
- e) The right to restrict or oppose the processing** within the limits and conditions provided by law.
- f) The right to data portability** where Edenred shall transfer the collected personal data in a structured automatically read form, for example, in Excel)
- g) The right to be informed in case of a data breach.**
- h) The right to withdraw given consent at any moment**, when the data processing is based on this legal basis.

6.2 For any additional questions regarding the manner in which personal data is processed and for exercising the rights mentioned above, please [fill out the following form](#).

6.3 The Bulgarian Data Protection Commission (<https://www.cpdp.bg/>) can also be contacted if there are any complaints regarding the processing activities performed by Edenred Bulgaria.

7. COOKIES

The Edenred + Platform uses cookies. "Cookies" are small text files that are stored by the browser and are normally used to gather statistical information and to analyze trends of use or access to a website. Cookies cannot be used to run programs or deliver viruses to devices. Cookies may be used to save personal preferences, so they do not have to be re-entered each time the Platform is accessed. For more about our use of cookies, please see our cookie policy.

8. UPDATING THE INFORMATION INCLUDED IN THIS POLICY

Edenred can periodically update this Policy, as the activity and Services provided expand or change, or in the event in which Edenred is legally obliged to make amendments. In the event in which Edenred proceeds as such, the latest version of the Policy will be displayed on its own websites. Therefore, please check periodically if such updates exist. In the event in which Edenred makes major amendments to the practices mentioned in the present Policy, we will inform both Clients and Users by using the provided contact data.