

# Privacy policy (1/3)



## 1. GENERAL

**1.1** Edenred Sweden AB, reg.no. 556253-6341 ("Edenred") respects and cares about your personal integrity. We want you to feel safe when we process your personal data. By way of this privacy policy ("Privacy Policy"), we want to inform you about how we ensure that your personal data is processed in the right way

**1.2** To be able to provide you as a subscriber with our services, we must process personal data about you. This Privacy Policy applies to you who procure a Rikskuponger card from Edenred.

## 2. DATA CONTROLLER

Edenred is the data controller for the processing of your personal data and is responsible for ensuring that the processing is made in compliance with applicable law. You find our contact details at the last page of this Privacy Policy.

## 3. OUR PROCESSING OF YOUR PERSONAL DATA

**3.1** At Edenred, we process your personal data to provide you with the services we offer in the best way possible. We use your personal data to:

- Administer and carry out our obligations towards

you and safeguard our legal interests,

- Information, offer and marketing,
- Administration in connection with company takeovers, restructuring, etc. of Edenred, and
- Comply with our legal obligations and prevent and take measures against crimes.

**3.2** In the tables below, you are provided with more information regarding e.g. why we process your personal data, which personal data we store to achieve the purposes of the processing and for how long we store your personal data.

<p><b>PURPOSE:</b> Administer and carry out our obligations towards your employer and safeguard our legal interests,</p>		
<p><b>PERSONAL DATA:</b> Contact information such as name, address, email address and national identification number. Orders and payment information such as order history and payment information. Login information such as username, email address and password. Work-related information such as company name, cost centre, employment number and registration number.</p>		
<p><b>WHAT WE DO:</b> We process your personal data to provide you our products, facilitate login to our web services and our app and provide you customer services as a user of a Rikskuponger card in accordance with our agreement with your employer. In case of a dispute regarding e.g. payment, we are entitled to process your personal data to establish, exercise or defend the legal claim.</p>	<p><b>LEGAL BASIS:</b> Legitimate interest, as we assess that our interest of providing you with a Rikskuponger card in accordance with our agreement with your employer overrides your interest of protection of your privacy. In addition, we consider the processing to be of such a type that you can reasonably expect. In case of a dispute, we are entitled to process your personal data with legitimate interest as legal basis.</p>	<p><b>RETENTION PERIOD:</b> Your personal data is kept during the entire contract period, i.e. for the duration of you being in possession of a Rikskuponger card or until the agreement between Edenred and your employer is cancelled and 12 months thereafter. We may keep your personal data for a longer time period if necessary to establish, exercise or defend a legal claim in case of a dispute regarding e.g. payment.</p>
<p><b>YOUR RIGHTS:</b> You have the right to object to processing of your personal data based upon a legitimate interest as legal basis. Please see section 9 below if you want to read more about your rights.</p>		

<p><b>PURPOSE:</b> Marketing</p>		
<p><b>PERSONAL DATA:</b> Contact information such as name, telephone number and email address. Orders and payment information such as order history and payment information. Work-related information such as company name and registration number.</p>		
<p><b>WHAT WE DO:</b> We process your personal data within the scope of our marketing, as we send you newsletter as a user of the Rikskuponger card.</p>	<p><b>LEGAL BASIS:</b> Legitimate interest, as we assess that our interest of marketing our services and products overrides your interest of protection of your privacy (for marketing by way of post and telephone and marketing by way of email, SMS, MMS and other automated systems if certain legal requirements are satisfied).</p>	<p><b>RETENTION PERIOD:</b> The personal data is stored and processed during the entire contract period, i.e. for the duration of you being in possession of a Rikskuponger card or until the agreement between Edenred and your employer is cancelled and 12 months thereafter.</p>
<p><b>YOUR RIGHTS:</b> You always have right to demand that we stop using your personal data for direct marketing purposes. You have the right to object to processing of your personal data based upon a legitimate interest as legal basis. You also always have the right to at any point in time withdraw your consent when we are required to obtain your consent in order to process your personal data. Please see section 9 if you want to read more about your rights.</p>		

## Privacy policy (2/3)



<p><b>PURPOSE:</b> Administration in connection with acquisition or restructuring of Edenred, etc.</p>		
<p><b>PERSONAL DATA:</b> Contact information such as name, telephone number and email address. Orders and payment information such as order history and payment information. Work-related information such as company name and registration number.</p>		
<p><b>WHAT WE DO:</b> If Edenred is to be restructured, e.g. be split into several parts, or if a third party wishes to acquire Edenred or our customer database, Edenred will share yours and other customers' personal data to the acquiring company. That company will in that case continue to process your personal data for the same purposes as the ones stated in this Privacy Policy, unless you receive different information in connection with the acquisition.</p>	<p><b>LEGAL BASIS:</b> Legitimate interest, as we assess that our interest of facilitating a company acquisition or restructuring overrides your interest of protection of your privacy. This is conditioned on the acquiring company being in a similar line of business as Edenred.</p>	<p><b>RETENTION PERIOD:</b> If Edenred ceases to exist, e.g. by way of a fusion, liquidation or bankruptcy, or if Edenred's customer database will be transferred to an acquiring company we will delete your personal data as long as we are not required to keep in order to comply with legal obligations. If Edenred is acquired by a company or split into several parts in connection with a restructuring we will continue to store and process your personal data in accordance with the terms and conditions of this Privacy Policy, unless you receive different information in connection with the acquisition.</p>
<p><b>YOUR RIGHTS:</b> You have the right to object to processing of your personal data based upon a legitimate interest as legal basis. Please see section 9 if you want to read more about your rights.</p>		

<p><b>PURPOSE:</b> Comply with our legal obligations and take measures against crimes.</p>		
<p><b>PERSONAL DATA:</b> Invoice information such as name on invoice and transaction history. Other information such as national identification number, name, e-mail, telephone-number, address.</p>		
<p><b>WHAT WE DO:</b> We process your personal data to comply with our legal obligations under applicable law, e.g. legislation regarding accounting, audit and tax. We will also give out your information if we receive a request from prosecutor or police.</p>	<p><b>LEGAL BASIS:</b> Compliance with a legal obligation. Public interest in the purpose of preventing and taking measures against crimes.</p>	<p><b>RETENTION PERIOD:</b> Your personal data is kept for as long as necessary to comply with applicable legal obligation such For the accounting act, personal data may be stored for 7 years counted from the close of the calendar year of the financial year to which the information belonged is concluded. For the work environment act, personal data may be stored for 10 years counted from the date they were received.</p>
<p><b>YOUR RIGHTS:</b> Please see section 9 below.</p>		

#### 4. WHERE WE COLLECT YOUR PERSONAL DATA FROM

**4.1** The personal data we process about you is obtained from different sources. Your employer provides us with information such as your name, personal identification number, address, email address, telephone number, company name and employment number when they order a Rikskuponger card from us. You provide us with information such as name, personal identification number, address, email address telephone number when you register an account and when you provide us with updated personal information.

**4.2** We may also collect your personal data from credit information agencies and public records. These provide us with information such as name and

address when this information has changed.

**4.3** For us to be able to provide you with your Rikskuponger card it is required that you or your employer provide us with your personal data. If your employer or you do not provide us with this personal data, we unfortunately cannot provide you with a Rikskuponger card.

#### 5. AUTOMATED DECISION-MAKING

We do not use any automated decision-making which has significant effects on you.

#### 6. FOR HOW LONG DO WE KEEP YOUR PERSONAL DATA?

**6.1** We only keep your personal data for as long time as necessary to achieve the purposes for which they

were collected in accordance with this Privacy Policy. When we do no longer need your personal data, we remove the data from our systems, databases and backups. In the tables above under section 3, you may read more information about for how long time we keep your personal data for different purposes.

**6.2** We may be required to keep your personal data for other reasons, such as to comply with legal obligations or to safeguard our legal interest, or for any other important public interest. The access to this personal data is restricted so that only a limited amount of persons are authorised to access the data.

#### 7. WITH WHOM DO WE SHARE YOUR PERSONAL DATA WITH?

**7.1** Edenred may share your personal data with

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third parties such as other group companies and companies with which we cooperate with to in order to supply you with a Rikskuponger card. We will therefore share your personal data with some of our service providers, such as IT vendors and card vender in order to carry out our obligations to you. We may also in certain cases be required to share your personal data with public authorities or other third parties in connection with court proceedings, corporate acquisitions or similar reasons.

7.2 We will not sell your personal data to any third party.

## 8. WHERE DO WE PROCESS YOUR PERSONAL DATA?

Edenred only processes your personal data within the EU/EEA and does not share or facilitate access to your personal data with any operator outside of the EU/EEA.

## 9. YOUR RIGHTS

### 9.1 Our responsibility for your rights

9.1.1 Edenred is in the capacity as data controller responsible for ensuring that your personal data is processed in accordance with applicable law and that your rights have an impact on the processing. You may at any time contact us to exercise your rights. You find our contact details at the last page of this Privacy Policy.

9.1.2 Edenred is obliged to answer your request to exercise your rights within one month from our receipt of your request. If your request is complicated, or if we have received a large extent of requests, we are entitled to prolong our response period with two additional months. If we assess that we cannot perform the actions you have requested, we will within one month explain why and inform you about your right to lodge a complaint with the data protection authority.

9.1.3 All information and communication, and all actions we carry out, is at no cost for you. If the action you request is manifestly unfounded or excessive, we are entitled to charge you an administrative fee to provide you with the requested information or carry out the requested action, or refuse to meet your request.

9.2 Your right to access, rectification and erasure of personal data and restriction of processing

9.2.1 You have the right to request:

a) Access to your personal data. This means that you have the right to request an abstract from our data record regarding our use of your personal data. You also have the right to request a copy of the personal information being processed at no cost. However, we may charge you a reasonable administrative fee to provide you with additional copies of the personal data. If you make your access request by electronic means such as email, we will provide you with the information in a commonly used electronic format.

b) Rectification of your personal data. We will at your request, or at our own initiative, rectify, anonymise, erase or complement personal data that you or we discover is inaccurate, incomplete or misleading. You also have the right to complement the personal data with additional data if relevant information is missing.

c) Erasure of your personal data. You have the right to request that we erase your personal data if we do no

longer have an acceptable reason for processing the data. Given this, erasure shall be made by us if:

- (i) the personal data is no longer necessary for the purposes for which it was collected,
- (ii) we process your personal data on the basis of your consent,
- (iii) you object to the processing of your personal data based on our legitimate interest and there is no overriding legitimate ground for the processing,
- (iv) the personal data has not been lawfully processed,
- (v) we are required to erase the personal data due to a legal obligation.

However, there might be requirements under applicable law, or other weighty reasons, that entail in that we cannot immediately erase your personal data. In such case, we will stop using your personal data for any other reasons than to comply with the applicable law, or the relevant weighty reason.

d) Right to restrict processing: This means that we temporarily restrict the processing of your personal data. You have (from the 25th of May 2018) the right to request restriction of the processing when:

- (i) you have requested rectification of your personal data in accordance with section 9.2.1 b) above during the time period we are verifying the accuracy of the data,
- (ii) the processing is unlawful and you do not want the personal data to be erased,
- (iii) Edenred, in its capacity as data controller, does no longer need the personal data for the purposes for which it was processed, but you require us to retain the information for the establishment, exercise or defence of legal claims, or
- (iv) you have objected to our legitimate interest for the processing in accordance with section 9.3 below during the time period we determine whether the legitimate interest overrides your privacy rights.

9.2.2 At Edenred, we will (from the 25th of May) take all reasonable and possible actions to notify any recipients of your personal data as set out in section 7 above regarding any rectification, erasure or restrictions carried out by us. At your request, we will also inform you of which third parties we have shared your personal data with.

### 9.3 Your right to object to the processing

9.3.1 You have the right to object to such processing of your personal data based upon our legitimate interest (please see section 3 above). If you object to such processing, we will only continue with the processing if we have a compelling legitimate reason for the processing that outweighs your interest, rights or freedoms, or unless continued processing is necessary for the establishment, exercise or defence of a legal claim.

9.3.2 If you do not want Edenred to process your personal data for direct marketing you always have the right to object to such processing by getting in touch with us. When we have received your objection we will cease to process your personal data for this marketing purpose.

### 9.4 Your right to portability

You have the right to portability. This means that you

have the right to receive certain of your personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller. You only have this right when your personal data is processed by automated means and our legal basis for the processing is performance of a contract between you and Edenred. This means e.g. that you have the right to receive and transfer all of the personal data that you have provided us with to create a user account at our web page.

9.5 Your right to lodge a complaint with the data protection authority

You have the right to lodge any complaints regarding our processing of your personal data with the data protection authority.

## 10. WE PROTECT YOUR PERSONAL DATA

You shall always feel safe when providing us with your personal data. Therefore, Edenred has implemented appropriate security measures to protect your personal data against unauthorised access, alteration and erasure. In the case of a security breach that may significantly affect you or your personal data, e.g. when there is a risk of fraud or identity theft, we will contact you and inform you of what you can do to reduce this risk.

## 11. AMENDMENTS TO THIS PRIVACY POLICY

Edenred has the right to amend this Privacy Policy at any time. When we make any amendments that are not only linguistic or editorial, you will be provided with clear information of the amendments and which impact they will have on you before the amendments are effective. If we require your consent in order for us to be able to perform our obligations to you and you do not accept the amended terms and conditions you have the right to cancel the agreement with us before the amendments enter into force.

## 12. CONTACT INFORMATION

Do not hesitate to contact us at Edenred if you have any questions regarding this Privacy Policy, our processing of your personal data, or if you want to exercise your rights.

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