

## PERSONAL DATA PROTECTION

<b>I. PURPOSE</b>	<b>3</b>
<b>II. IDENTITY AND CONTACT DETAILS OF THE CONTROLLER - CONTACT DETAILS OF THE DATA PROTECTION OFFICER</b>	<b>3</b>
• IDENTITY AND CONTACT DETAILS OF THE CONTROLLER	3
• CONTACT DETAILS OF THE DATA PROTECTION OFFICER	4
<b>III. CONTACT</b>	<b>5</b>
<b>IV. PROCESSING</b>	<b>5</b>
• MANAGEMENT OF TICKET RESTAURANT®	5
1. PURPOSE	5
2. LEGAL BASIS OF THE PROCESSING	6
3. DATA SOURCE	6
4. CATEGORIES OF DATA PROCESSED	6
5. DATA RECIPIENTS	7
6. DATA TRANSFER	7
7. DECISION BASED EXCLUSIVELY ON AUTOMATED PROCESSING, INCLUDING PROFILING	7
8. RETENTION PERIOD	7
• MANAGEMENT OF TICKET ECOCHEQUE®	8
9. PURPOSE	8
10. LEGAL BASIS OF THE PROCESSING	8
11. DATA SOURCE	9
12. CATEGORIES OF DATA PROCESSED	9
13. DATA RECIPIENTS	9
14. DATA TRANSFER	10
15. DECISION BASED EXCLUSIVELY ON AUTOMATED PROCESSING, INCLUDING PROFILING	10
16. RETENTION PERIOD	10
• MANAGEMENT OF TICKET COMPLIMENTS®	11
17. PURPOSE	11
18. LEGAL BASIS OF THE PROCESSING	11
19. DATA SOURCE	11
20. CATEGORIES OF DATA PROCESSED	12
21. DATA RECIPIENTS	12
22. DATA TRANSFER	13
23. DECISION BASED EXCLUSIVELY ON AUTOMATED PROCESSING, INCLUDING PROFILING	13
24. RETENTION PERIOD	13
• PROMOTION OF EDENRED BELGIUM'S PRODUCTS AND SERVICES	13
25. PURPOSE	13
26. LEGAL BASIS OF THE PROCESSING	13
27. DATA SOURCE	14
28. CATEGORIES OF DATA PROCESSED	14
29. DATA RECIPIENTS	14
30. DATA TRANSFER	15
31. DECISION BASED EXCLUSIVELY ON AUTOMATED PROCESSING, INCLUDING PROFILING	15

<b>32. RETENTION PERIOD</b>	<b>15</b>
• THE PROMOTION OF THE PRODUCTS AND SERVICES OF THIRD-PARTY PARTNERS BY EDENRED BELGIUM	15
<b>33. PURPOSE</b>	<b>15</b>
<b>34. LEGAL BASIS OF THE PROCESSING</b>	<b>15</b>
<b>35. DATA SOURCE</b>	<b>16</b>
<b>36. CATEGORIES OF DATA PROCESSED</b>	<b>16</b>
<b>37. DATA RECIPIENTS</b>	<b>16</b>
<b>38. DATA TRANSFER</b>	<b>17</b>
<b>39. DECISION BASED EXCLUSIVELY ON AUTOMATED PROCESSING, INCLUDING PROFILING</b>	<b>17</b>
<b>40. RETENTION PERIOD</b>	<b>17</b>
• USE OF THE EDENRED WEBSITE AND CONTACT THAT IS NOT PART OF THE OTHER PROCESSING	17
<b>41. PURPOSE</b>	<b>17</b>
<b>42. LEGAL BASIS OF THE PROCESSING</b>	<b>17</b>
<b>43. DATA SOURCE</b>	<b>17</b>
<b>44. CATEGORIES OF DATA PROCESSED</b>	<b>18</b>
<b>45. DATA RECIPIENTS</b>	<b>18</b>
<b>46. DATA TRANSFER</b>	<b>18</b>
<b>47. DECISION BASED EXCLUSIVELY ON AUTOMATED PROCESSING, INCLUDING PROFILING</b>	<b>18</b>
<b>48. RETENTION PERIOD</b>	<b>19</b>
• SECURITY	19
<b>49. PURPOSE</b>	<b>19</b>
<b>50. LEGAL BASIS OF THE PROCESSING</b>	<b>19</b>
<b>51. DATA SOURCE</b>	<b>19</b>
<b>52. CATEGORIES OF DATA PROCESSED</b>	<b>19</b>
<b>53. DATA RECIPIENTS</b>	<b>19</b>
<b>54. DATA TRANSFER</b>	<b>20</b>
<b>55. DECISION BASED EXCLUSIVELY ON AUTOMATED PROCESSING, INCLUDING PROFILING</b>	<b>20</b>
<b>56. RETENTION PERIOD</b>	<b>20</b>
• STATISTICS	21
<b>57. PURPOSE</b>	<b>21</b>
<b>58. LEGAL BASIS OF THE PROCESSING</b>	<b>21</b>
<b>59. DATA SOURCE</b>	<b>21</b>
<b>60. CATEGORIES OF DATA PROCESSED</b>	<b>21</b>
<b>61. DATA RECIPIENTS</b>	<b>22</b>
<b>62. DATA TRANSFER</b>	<b>22</b>
<b>63. DECISION BASED EXCLUSIVELY ON AUTOMATED PROCESSING, INCLUDING PROFILING</b>	<b>22</b>
<b>64. RETENTION PERIOD</b>	<b>23</b>

## **V. RIGHTS OF USERS** **23**

• PREAMBLE	23
• ACCESS	24
• RECTIFICATION	24
• ERASURE	25
• RIGHT TO RESTRICTION OF PROCESSING	25
• NOTIFICATION OBLIGATION REGARDING RECTIFICATION OR ERASURE OF PERSONAL DATA OR RESTRICTION OF PROCESSING	26
• RIGHT TO DATA PORTABILITY	26
• RIGHT TO OBJECT	27
• AUTOMATED INDIVIDUAL DECISION-MAKING, INCLUDING PROFILING	27

## I. Purpose

Edenred Belgium attaches great importance to the protection of the personal data that it has to process as controller in the course of its activities.

The processing covers all operations applied to the data that directly or indirectly helps identify a natural person, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

This document is intended to provide the data subjects with the information required by the applicable regulations and in particular by Regulation (EU)2016/679 of the European Parliament and of the Council of 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 (General Data Protection Regulation or “GDPR”).

## II. Identity and contact details of the controller - Contact details of the data protection officer

- Identity and contact details of the controller

**Edenred Belgium**, a public limited company whose registered office is located at 1160 Brussels, Boulevard du Souverain, 165, bte 9 and registered with the Crossroads Bank for Enterprises under number BE 0407.034.269 (hereinafter “Edenred Belgium”), represented by its Chief Executive Officer, Mr Olivier Bouquet, is responsible for the processing of personal data as part of its activity of issuing vouchers for the private and public sector.

For the private sector, Edenred Belgium processes the personal data of:

- recipients of electronic or paper vouchers published by it for companies in the context of their working or business relations: electronic or paper Ticket Restaurant<sup>®</sup> meal cards, electronic or paper Ticket EcoCheque<sup>®</sup> eco-vouchers, electronic Ticket Compliments<sup>®</sup> gift vouchers (hereinafter the “ERBE” Vouchers);
- users of the *website* “<http://www.myedenred.be>” (hereinafter “the Myedenred Website”) and/or the Myedenred mobile app (hereinafter “the Application”) dedicated to ERBE Vouchers.

For the public sector, Edenred Belgium processes the personal data of:

- beneficiaries of paper vouchers published by Edenred Belgium for institutions under the brand Ticket S<sup>®</sup> allowing their beneficiaries to acquire food aid.

In general, Edenred Belgium processes personal data of:

- users of the *website* “<http://www.edenred.be>” (hereinafter referred to as “the Edenred Website”);
- of all persons dealing with Edenred Belgium by way of using the different services offered by it.

The persons whose personal data are processed by Edenred Belgium in its capacity as controller are hereinafter referred to individually as “the User” or collectively as “the Users”.

For the public sector, Edenred Belgium also processes personal data in the context of:

- The management of the ALE paper voucher system in the Walloon Region for the FOREM (more information on [www.ale-wallonie.be](http://www.ale-wallonie.be));
- The management of the ALE paper voucher system in the Brussels-Capital Region for ACTIRIS (more information on [www.ale-bruxelles.be](http://www.ale-bruxelles.be));
- The management of the ALE paper voucher system in the German-speaking Community for ADG (more information on [www.adg.be/lba](http://www.adg.be/lba));
- The management of the Wijk-werkcheques electronic and paper voucher system in the Flemish Region for the VDAB (more information on [vdab.be/wijk-werken](http://vdab.be/wijk-werken));
- The management of the Opleidingscheques paper voucher system in the Flemish Region for the VDAB (more information on <https://www.vdab.be/opleidingscheques/werknemers.shtml>);
- The management of the Loopbaancheques electronic voucher system in the Flemish Region for the VDAB (more information on <https://www.vdab.be/loopbaanbegeleiding>);
- The management of the Chèques Taxi paper voucher system for the Brussels-Capital Region (more information on <https://mobilite-mobiliteit.brussels/en/a-taxi-a-the-portee-of-all> );
- The management of the Chèques Propreté paper voucher system for various municipal administrations.

In this context, Edenred Belgium acts as processor of these authorities, who remain responsible for the processing carried out on their behalf by Edenred Belgium.

Edenred Belgium uses the personal data processed in this context only for the sole purpose of the tasks entrusted to it by the aforementioned authorities and on the documented instructions of these authorities. It ensures the implementation of appropriate technical and organisational measures to ensure that the processing meets the requirements of the GDPR.

- Contact details of the Data Protection Officer

Boulevard du Souverain, 165 boîte 9 1160 Brussels

Email: [dpo.belgium@edenred.com](mailto:dpo.belgium@edenred.com)

Tel.: 02/678 28 11 - Fax: 02/678 28 28

[Multimodal access plan \(PDF\)](#).

### III. Contact

For any request relating to personal data, and in particular to exercise the rights referred to in Article V below, the User may contact:

**Edenred Belgium**

Quality Department

Boulevard du Souverain 165, bte 9

1160 Brussels

[dpo.belgium@edenred.com](mailto:dpo.belgium@edenred.com)

Tel.: 02/678 28 11 - Fax: 02/678 28 28

[Multimodal access plan \(PDF\)](#).

Contact forms are also made available to Users *via* the Help Centre accessible on the Myedenred Website and the Edenred Website.

### IV. Processing

- Management of Ticket Restaurant®

#### 1. Purpose

Edenred Belgium processes personal data for purposes relating to the management of electronic meal vouchers published by it, as an authorised publisher, under the brand Ticket Restaurant® (hereinafter “Ticket Restaurant®”).

The management of Ticket Restaurant® covers the following:

- The management of Ticket Restaurant® orders;
- The publishing of Ticket Restaurant® vouchers and their provision to the beneficiaries of Ticket Restaurant® (hereinafter “the Beneficiaries of Ticket Restaurant®”);
- The provision and activation of the card support allowing beneficiaries to use the Ticket Restaurant® vouchers (hereinafter “the Edenred Card”);
- The notification to the Beneficiaries of Ticket Restaurant® every time the Ticket Restaurant® is loaded, and about the approaching expiry date, the available balance and the transactions made using Ticket Restaurant®;
- The provision of information regarding the use of the Ticket Restaurant® vouchers to the Beneficiaries of Ticket Restaurant® in electronic or paper form;
- The secure use of Ticket Restaurant® vouchers including the provision of various means to block the Edenred Card in case of loss or theft;
- The processing of transactions made using Ticket Restaurant® vouchers following the “first in, first out” principle and reimbursement of merchants affiliated to the Edenred Belgium network who have accepted them as payment;
- The optimisation of browsing on the Myedenred Website and/or the Application.

## 2. Legal basis of the processing

The processing is necessary to fulfil the obligations undertaken by Edenred Belgium in its capacity as an authorised publisher under:

- the Royal Decree of 28 November 1969 implementing the Act of 27 June 1969 revising the Decree-Law of 28 December 1944 concerning the social security of workers (Article 19*bis*);
- the law of 30 December 2009 containing various provisions (Articles 183 to 185);
- the Royal Decree of 12 October 2010 laying down the approval conditions and procedure for publishers of electronic meal vouchers or eco-cheques, implementing Articles 183 to 185 of the law of 30 December 2009 on various provisions.

## 3. Data source

The personal data concerned are communicated by:

- the employer when ordering Ticket Restaurant® vouchers for Beneficiaries of Ticket Restaurant®;
- the Beneficiaries of Ticket Restaurant® themselves when using the Ticket Restaurant® voucher, the Myedenred Website and/or the Application,
- the individuals authorised by the employers to use their Customer Space on the Myedenred Website or to communicate with Edenred Belgium as part of the management of Ticket Restaurant® vouchers;
- the individuals authorised by the merchants affiliated to the Ticket Restaurant® network to use their Merchant Space on the Myedenred Website or to communicate with Edenred Belgium as part of the management of Ticket Restaurant® vouchers;

## 4. Categories of data processed

The personal data communicated by the employer concerning Beneficiaries of Ticket Restaurant® include:

- identification data:
  - mandatory data: last name, first name, address, national register number;
  - optional data: landline and/or mobile phone number, email address;
- personal characteristics: age, gender, title, language;
- data relating to Ticket Restaurant® vouchers associated with a Beneficiary of Ticket Restaurant®: quantity, face value, validity period, point of distribution/delivery.

The personal data communicated by the Beneficiaries of Ticket Restaurant® as well as the Users of the Myedenred Website and/or the Application include, as the case may be:

- identification data : last name, first name, address, company number, landline and/or mobile number, email address, username, password;
- personal characteristics: age, gender, title, language, profession;
- electronic identification data: IP addresses, cookies;
- data relating to transactions made using Ticket Restaurant®;
- data relating to the behaviour and habits of Users when using the Myedenred Website and/or the Application;
- data relating to incidents that may occur while using the Myedenred Website and/or the Application.

## 5. Data recipients

The personal data are exclusively intended for:

- the individuals and organisations in direct contact with Edenred Belgium requiring the data as part of the management of Ticket Restaurant®;
- the employers of the Beneficiaries of Ticket Restaurant® as part of the management of Ticket Restaurant® for members of their staff;
- the Beneficiaries of Ticket Restaurant® as part of the management of their Ticket Restaurant® vouchers;
- the authorities that require such data, including the National Social Security Office.

They are not shared with third parties.

The processors of Edenred Belgium include:

- For application development and support: EDENRED FRANCE SAS, a French company whose registered office is located at 92240 Malakoff (France), Boulevard Gabriel Péri, 166/180, RCS Nanterre 393 365 135, Siret 393 365 135 00358;
- For the hosting information systems: DXC TECHNOLOGY FRANCE SAS, a French company whose registered office is located at 92400 Courbevoie (France), Place des Corolles, Tour Carpe Diem CS40075, RCS Nanterre 315 268 664, Siret 315 268 664 00143;
- For authorisation of transactions: PREPAY TECHNOLOGIES Ltd, an English company whose registered office is located at London W2 6HY (United Kingdom), Sheldon Square, 3, Business Number 04008083;
- For manufacturing Edenred Cards: GIESECKE & DEVRIENT GmbH, a German company whose registered office is located at 81677 Munich (Germany), Prinzregentenstraße 159, Registration number HRB 4619, VAT 129365746;
- For the Card Stop service: WORLDLINE SA, a Belgian company whose registered office is located at 1130 Haren (Brussels) (Belgium), Chaussée de Haecht, 1442 and registered with the Crossroads Bank of Enterprises under number 0418.547.872;
- For the Help Centre accessible on the Myedenred Website and the Edenred Website: PREMIUM PLUS SPRL, a Belgian company whose registered office is located at 9170 Sint-Gillis-Waas (Belgium) and registered with the Crossroads Bank for Enterprises under number 0844.776.562.

## 6. Data transfer

The processing does not involve any transfer of personal data to a country that is not a member of the European Economic Area.

## 7. Decision based exclusively on automated processing, including profiling

The processing does not involve any decision based exclusively on automated processing, including profiling.

## 8. Retention period

Personal data are retained for a period of 10 years after the closure of the record.

- Management of Ticket EcoCheque®

## 9. Purpose

Edenred Belgium processes personal data for purposes relating to the management of electronic and paper eco-vouchers published by it, as an authorised publisher, under the brand Ticket EcoCheque® (hereinafter “Ticket EcoCheque®”).

The management of Ticket EcoCheque® **electronic** eco-vouchers covers the following:

- The management of Ticket EcoCheque® orders;
- Publishing Ticket EcoCheque® eco-vouchers and providing them to the beneficiaries of Ticket EcoCheque® (hereinafter “the Beneficiaries of Ticket EcoCheque®”);
- The provision and activation of the card support allowing beneficiaries to use the Ticket EcoCheque® eco-vouchers (hereinafter “the Edenred Card”);
- The notification to the Beneficiaries of Ticket EcoCheque® every time the Ticket EcoCheque® is loaded, and about the approaching expiry date, the available balance and the transactions made using Ticket EcoCheque®;
- The provision of information regarding the use of the Ticket EcoCheque® eco-vouchers to the Beneficiaries of Ticket EcoCheque® in electronic or paper form;
- The secure use of Ticket EcoCheque® eco-vouchers including the provision of various means to block the Edenred Card in case of loss or theft;
- The processing of transactions made using Ticket EcoCheque® eco-vouchers following the “first in, first out” principle and reimbursement of merchants affiliated to the Edenred Belgium network who have accepted them as payment;
- The optimisation of browsing on the Myedenred Website and/or the Application.

The management of Ticket EcoCheque® **paper** eco-vouchers covers the following:

- Publishing Ticket EcoCheque® eco-vouchers and providing them to the beneficiaries of Ticket EcoCheque® (hereinafter “the Beneficiaries of Ticket EcoCheque®”);
- The provision of information regarding the use of the Ticket EcoCheque® eco-vouchers to the Beneficiaries of Ticket EcoCheque® in electronic or paper form;
- The secure use of Ticket EcoCheque®;
- The processing of transactions made using Ticket EcoCheque® eco-vouchers and the reimbursement of merchants affiliated to the Edenred Belgium network who have accepted them as payment.

## 10. Legal basis of the processing

The processing is necessary to fulfil the obligations undertaken by Edenred Belgium in its capacity as an authorised publisher under:

- the Royal Decree of 28 November 1969 implementing the Act of 27 June 1969 revising the Decree-Law of 28 December 1944 concerning the social security of workers (Article 19<sup>quater</sup>);

and regarding the Ticket EcoCheque® electronic eco-vouchers:



- the law of 30 December 2009 containing various provisions (Articles 183 to 185);
- the Royal Decree of 12 October 2010 laying down the approval conditions and procedure for publishers of electronic meal vouchers or eco-cheques, implementing Articles 183 to 185 of the law of 30 December 2009 on various provisions.

## 11. Data source

The personal data concerned are communicated by:

- the employer when ordering Ticket EcoCheque® eco-vouchers for Beneficiaries of Ticket EcoCheque®;
- the Beneficiaries of Ticket EcoCheque® themselves when using the Ticket EcoCheque® eco-voucher, the Myedenred Website and/or the Application,
- the individuals authorised by the employers to use their Customer Space on the Myedenred Website or to communicate with Edenred Belgium as part of the management of Ticket EcoCheque® eco-vouchers;
- the individuals authorised by the merchants affiliated to the Ticket EcoCheque® network to use their Merchant Space on the Myedenred Website or to communicate with Edenred Belgium as part of the management of Ticket EcoCheque® eco-vouchers;

## 12. Categories of data processed

The personal data communicated by the employer concerning Beneficiaries of Ticket EcoCheque® include:

- identification data:
  - mandatory data: last name, first name, address, national register number;
  - optional data: landline and/or mobile phone number, email address;
- personal characteristics: age, gender, title, language;
- data relating to Ticket EcoCheque® eco-vouchers associated with a Beneficiary of Ticket EcoCheque®: quantity, face value, validity period, point of distribution/delivery.

The personal data communicated by the Beneficiaries of Ticket EcoCheque® as well as the Users of the Myedenred Website and/or the Application include, as the case may be:

- identification data: last name, first name, address, company number, landline and/or mobile number, email address, username, password;
- personal characteristics: age, gender, title, language, profession;
- electronic identification data: IP addresses, cookies;
- data relating to transactions made using Ticket EcoCheque®;
- data relating to the behaviour and habits of Users when using the Myedenred Website and/or the Application;
- data relating to incidents that may occur while using the Myedenred Website and/or the Application.

## 13. Data recipients

The personal data are exclusively intended for:

- the individuals and organisations in direct contact with Edenred Belgium requiring the data as part of the management of Ticket EcoCheque®;
- the employers of the Beneficiaries of Ticket EcoCheque® as part of the management of Ticket EcoCheque® for members of their staff;

- the Beneficiaries of Ticket EcoCheque® as part of the management of their Ticket EcoCheque® eco-vouchers;
- the authorities that require such data, including the National Social Security Office.

They are not shared with third parties.

The processors of Edenred Belgium include, where appropriate:

- For application development and support: EDENRED FRANCE SAS, a French company whose registered office is located at 92240 Malakoff (France), Boulevard Gabriel Péri, 166/180, RCS Nanterre 393 365 135, Siret 393 365 135 00358;
- For the hosting information systems: DXC TECHNOLOGY FRANCE SAS, a French company whose registered office is located at 92400 Courbevoie (France), Place des Corolles, Tour Carpe Diem CS40075, RCS Nanterre 315 268 664, Siret 315 268 664 00143;
- For authorisation of transactions: PREPAY TECHNOLOGIES Ltd, an English company whose registered office is located at London W2 6HY (United Kingdom), Sheldon Square, 3, Business Number 04008083;
- For manufacturing Edenred Cards: GIESECKE & DEVRIENT GmbH, a German company whose registered office is located at 81677 Munich (Germany), Prinzregentenstraße 159, Registration number HRB 4619, VAT 129365746;
- For the Card Stop service: WORLDLINE SA, a Belgian company whose registered office is located at 1130 Haren (Brussels) (Belgium), Chaussée de Haecht, 1442 and registered with the Crossroads Bank of Enterprises under number 0418.547.872;
- For the Help Centre accessible on the Myedenred Website and the Edenred Website: PREMIUM PLUS SPRL, a Belgian company whose registered office is located at 9170 Sint-Gillis-Waas (Belgium) and registered with the Crossroads Bank for Enterprises under number 0844.776.562;
- For the production of Ticket Ecocheque® paper eco-vouchers: EDENRED PRODUCTION CENTER, a Czech company whose registered office is located at 110 00 Prague, Na poříčí 1076/5, Nové Město (Praha 1), Business number 06678114.

#### **14. Data transfer**

The processing does not involve any transfer of personal data to a country that is not a member of the European Economic Area.

#### **15. Decision based exclusively on automated processing, including profiling**

The processing does not involve any decision based exclusively on automated processing, including profiling.

#### **16. Retention period**

Personal data are retained for a period of 10 years after the closure of the record.

- Management of Ticket Compliments®

## 17. Purpose

Edenred Belgium processes personal data for purposes relating to the management of electronic gift vouchers published by it, as an authorised publisher, under the brand Ticket Compliments® (hereinafter “Ticket Compliments®”).

The management of Ticket Compliments® **electronic** gift vouchers covers the following:

- The management of Ticket Compliments® orders;
- Publishing Ticket Compliments® gift vouchers and providing them to the beneficiaries of Ticket Compliments® (hereinafter “the Beneficiaries of Ticket Compliments®”);
- The provision and activation of the card support allowing beneficiaries to use the Ticket Compliments® gift vouchers (hereinafter “the Edenred Card”);
- The notification to the Beneficiaries of Ticket Compliments® every time the Ticket Compliments® is loaded, and about the approaching expiry date, the available balance and the transactions made using Ticket Compliments®;
- The provision of information regarding the use of the Ticket Compliments® gift vouchers to the Beneficiaries of Ticket Compliments® in electronic or paper form;
- The secure use of Ticket Compliments® gift vouchers including the provision of various means to block the Edenred Card in case of loss or theft;
- The processing of transactions made using Ticket Compliments® gift vouchers following the “first in, first out” principle and reimbursement of merchants affiliated to the Edenred Belgium network who have accepted them as payment;
- The optimisation of browsing on the Myedenred Website and/or the Application.

## 18. Legal basis of the processing

The processing is required for the performance a contract to which the Beneficiaries of electronic Ticket Compliments® gift vouchers, the companies granting them, and the affiliates of the Ticket Compliments®, are respectively parties or for the execution of pre-contractual measures taken at their request.

## 19. Data source

The personal data concerned are communicated by:

- the company granting them when ordering Ticket Compliments® and relating to the Beneficiaries of Ticket Compliments®;
- the Beneficiaries of Ticket Compliments® themselves when using the Ticket Compliments® gift voucher, the Myedenred Website and/or the Application,
- the individuals authorised by the employers granting the Ticket Compliments® gift vouchers to use their Customer Space on the Myedenred Website or to communicate with Edenred Belgium as part of the management of Ticket Compliments® gift vouchers;
- the individuals authorised by the merchants affiliated to the Ticket Restaurant® network to use their Merchant Space or to communicate with Edenred Belgium as part of the management of Ticket Compliments® gift vouchers;

## 20. Categories of data processed

The personal data communicated by the employer concerning Beneficiaries of Ticket Compliments® include:

- identification data:
  - mandatory data: last name, first name, address, national register number;
  - optional data: landline and/or mobile phone number, email address;
- personal characteristics: age, gender, title, language;
- data relating to the Ticket Compliments® gift vouchers associated with a Beneficiary of Ticket Compliments®: quantity, face value, validity period, point of distribution/delivery.

The personal data communicated by the Beneficiaries of Ticket Compliments® as well as the Users of the Myedenred Website and/or the Application include, as the case may be:

- identification data: last name, first name, address, company number, landline and/or mobile number, email address, username, password;
- personal characteristics: age, gender, title, language, profession;
- electronic identification data: IP addresses, cookies;
- data relating to transactions made using Ticket Compliments®;
- data relating to the behaviour and habits of Users when using the Myedenred Website and/or the Application;
- data relating to incidents that may occur while using the Myedenred Website and/or the Application.

## 21. Data recipients

The personal data are exclusively intended for:

- the individuals and organisations in direct contact with Edenred Belgium requiring the data as part of the management of electronic Ticket Compliments® gift vouchers;
- the companies offering Ticket Compliments® gift vouchers as part of the management of Ticket Compliments® for members of their staff or their business relations.
- the Beneficiaries of electronic Ticket Compliments® gift vouchers as part of the management of their Ticket Compliments® gift vouchers;
- the authorities that require such data, including the National Social Security Office.

They are not shared with third parties.

The processors of Edenred Belgium include:

- For application development and support: EDENRED FRANCE SAS, a French company whose registered office is located at 92240 Malakoff (France), Boulevard Gabriel Péri, 166/180, RCS Nanterre 393 365 135, Siret 393 365 135 00358;

- For the hosting information systems: DXC TECHNOLOGY FRANCE SAS, a French company whose registered office is located at 92400 Courbevoie (France), Place des Corolles, Tour Carpe Diem CS40075, RCS Nanterre 315 268 664, Siret 315 268 664 00143;
- For authorisation of transactions: PREPAY TECHNOLOGIES Ltd, an English company whose registered office is located at London W2 6HY (United Kingdom), Sheldon Square, 3, Business Number 04008083;
- For manufacturing Edenred Cards: GIESECKE & DEVRIENT GmbH, a German company whose registered office is located at 81677 Munich (Germany), Prinzregentenstraße 159, Registration number HRB 4619, VAT 129365746;
- For the Card Stop service: WORLDLINE SA, a Belgian company whose registered office is located at 1130 Haren (Brussels) (Belgium), Chaussée de Haecht, 1442 and registered with the Crossroads Bank of Enterprises under number 0418.547.872;
- For the Help Centre accessible on the Myedenred Website and the Edenred Website: PREMIUM PLUS SPRL, a Belgian company whose registered office is located at 9170 Sint-Gillis-Waas (Belgium) and registered with the Crossroads Bank for Enterprises under number 0844.776.562.

## **22. Data transfer**

The processing does not involve any transfer of personal data to a country that is not a member of the European Economic Area.

## **23. Decision based exclusively on automated processing, including profiling**

The processing does not involve any decision based exclusively on automated processing, including profiling.

## **24. Retention period**

Personal data are retained for a period of 10 years after the closure of the record.

- Promotion of Edenred Belgium's products and services

## **25. Purpose**

Edenred Belgium processes the personal data of Users of the Myedenred Website and/or the Application to promote its own products and/or services.

## **26. Legal basis of the processing**

This processing is based on the User's consent that he gives in advance by checking the *opt-in* box specifically dedicated to such processing.

The use of the ERBE Vouchers, the Myedenred Website and/or the Application is in no way subject to the acceptance of any form of promotional communication.

The User has the right to withdraw his consent at any time.

It is as easy for the User to withdraw as to give consent. To withdraw his consent, the User may simply uncheck the box used to confirm his *opt-in*. This box is in the Space provided for customers on the Myedenred Website, where they can manage their account.

The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof.

An unsubscribe link is included in every email or message sent to the User.

## 27. Data source

The personal data concerned are communicated by the Users of the Myedenred Website and/or the Application when registering and using the Myedenred Website and/or the Application.

## 28. Categories of data processed

The personal data communicated by the Users of the Myedenred Website and/or the Application include, as the case may be:

- identification data: last name, first name, address, company number, landline and/or mobile number, email address, username, password;
- personal characteristics: age, gender, title, language, profession;
- electronic identification data: IP addresses, cookies;
- data relating to the behaviour and habits of Users when using the Myedenred Website and/or the Application;
- data relating to incidents that may occur while using the Myedenred Website and/or the Application.

## 29. Data recipients

The personal data are exclusively intended for:

- the individuals and organisations in direct contact with Edenred Belgium requiring the data to promote the products and/or services of Edenred Belgium;
- the Users of the Myedenred Website and/or the Application.

They are not shared with third parties.

The processors of Edenred Belgium include:

- For application development and support: EDENRED FRANCE SAS, a French company whose registered office is located at 92240 Malakoff (France), Boulevard Gabriel Péri, 166/180, RCS Nanterre 393 365 135, Siret 393 365 135 00358;
- For the hosting information systems: DXC TECHNOLOGY FRANCE SAS, a French company whose registered office is located at 92400 Courbevoie (France), Place des Corolles, Tour Carpe Diem CS40075, RCS Nanterre 315 268 664, Siret 315 268 664 00143;
- For the Help Centre accessible on the Myedenred Website and the Edenred Website: PREMIUM PLUS SPRL, a Belgian company whose registered office is located at 9170 Sint-Gillis-Waas (Belgium) and registered with the Crossroads Bank for Enterprises under number 0844.776.562;
- For marketing activities: SELLIGENT BENELUX SA, a Belgian company whose registered office is located at 3500 Hasselt (Belgium), Kempische Steenweg 305, boîte 401 and registered with the Crossroads Bank for Enterprises under number 0478.839.312.

### **30. Data transfer**

The processing does not involve any transfer of data to a country that is not a member of the European Economic Area.

### **31. Decision based exclusively on automated processing, including profiling**

The processing does not involve any decision based exclusively on automated processing, including profiling.

### **32. Retention period**

Personal data are retained for a period of 10 years after the closure of the record.

- The promotion of the products and services of third-party partners by Edenred Belgium

### **33. Purpose**

Edenred Belgium processes the personal data of Users of the Myedenred Website and/or the Application to promote the products and/or services of third-party partners.

### **34. Legal basis of the processing**

This processing is based on the User's consent that he gives in advance by checking the *opt-in* box specifically dedicated to such processing.

The use of the ERBE Vouchers, the Myedenred Website and/or the Application is in no way subject to the acceptance of any form of promotional communication.

The User has the right to withdraw his consent at any time.

It is as easy for the User to withdraw as to give consent. To withdraw his consent, the User may simply uncheck the box used to confirm his *opt-in*. This box is in the Space provided for customers on the Myedenred Website, where they can manage their account.

The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof.

An unsubscribe link is included in every email or message sent to the User.

### **35. Data source**

The personal data concerned are communicated by the Users of the Myedenred Website and/or the Application when registering and using the Myedenred Website and/or the Application.

### **36. Categories of data processed**

The personal data communicated by the Users of the Myedenred Website and/or the Application include, as the case may be:

- identification data: last name, first name, address, company number, landline and/or mobile number, email address, username, password;
- personal characteristics: age, gender, title, language, profession;
- electronic identification data: IP addresses, cookies;
- data relating to the behaviour and habits of Users when using the Myedenred Website and/or the Application;
- data relating to incidents that may occur while using the Myedenred Website and/or the Application.

### **37. Data recipients**

The personal data are exclusively intended for:

- the individuals and organisations in direct contact with Edenred Belgium requiring the data to promote the products and/or services of third-party partners;
- the Users of the Myedenred Website and/or the Application.

They are not communicated to third parties, including third-party partners.

The processors of Edenred Belgium include:



- For application development and support: EDENRED FRANCE SAS, a French company whose registered office is located at 92240 Malakoff (France), Boulevard Gabriel Péri, 166/180, RCS Nanterre 393 365 135, Siret 393 365 135 00358;
- For the hosting information systems: DXC TECHNOLOGY FRANCE SAS, a French company whose registered office is located at 92400 Courbevoie (France), Place des Corolles, Tour Carpe Diem CS40075, RCS Nanterre 315 268 664, Siret 315 268 664 00143;
- For the Help Centre accessible on the Myedenred Website and the Edenred Website: PREMIUM PLUS SPRL, a Belgian company whose registered office is located at 9170 Sint-Gillis-Waas (Belgium) and registered with the Crossroads Bank for Enterprises under number 0844.776.562;
- For marketing activities: SELLIGENT BENELUX SA, a Belgian company whose registered office is located at 3500 Hasselt (Belgium), Kempische Steenweg 305, boîte 401 and registered with the Crossroads Bank for Enterprises under number 0478.839.312.

### **38. Data transfer**

The processing does not involve any transfer of personal data to a country that is not a member of the European Economic Area.

### **39. Decision based exclusively on automated processing, including profiling**

The processing does not involve any decision based exclusively on automated processing, including profiling.

### **40. Retention period**

Personal data are retained for a period of 10 years after the closure of the record.

- Use of the Edenred Website and contact that is not part of the other processing

### **41. Purpose**

Edenred Belgium processes the personal data of the Users of the Edenred Website as well as any User who deals with the company through any of the offered channels to optimise browsing on the Edenred Website or to best meet the requests of the persons contacting it for processing activities other than those specified above.

### **42. Legal basis of the processing**

This processing is necessary for the legitimate interests pursued by Edenred Belgium in connection with the purpose of the processing.

### **43. Data source**

The personal data concerned are communicated by the Users of the Edenred Website and/or communication channels offered by Edenred Belgium.

#### 44. Categories of data processed

The personal data communicated by the Users of the Edenred Website and/or the Application include, as the case may be:

- identification data : last name, first name, address, company number, landline and/or mobile number, email address;
- personal characteristics: age, gender, title, language, profession;
- electronic identification data: IP addresses, cookies;
- data relating to the behaviour and habits of Users when using the Edenred Website;
- data relating to incidents that may occur while using the Edenred Website and/or the communication channels offered by Edenred Belgium.

#### 45. Data recipients

The personal data are exclusively intended for:

- the individuals and organisations in direct contact with Edenred Belgium requiring the data for the management of the Edenred website and to respond to the requests made;
- the Users of the Edenred Website and/or communication channels offered by Edenred Belgium.

They are not shared with third parties.

The processors of Edenred Belgium include:

- For application development and support: EDENRED FRANCE SAS, a French company whose registered office is located at 92240 Malakoff (France), Boulevard Gabriel Péri, 166/180, RCS Nanterre 393 365 135, Siret 393 365 135 00358;
- For the hosting information systems: DXC TECHNOLOGY FRANCE SAS, a French company whose registered office is located at 92400 Courbevoie (France), Place des Corolles, Tour Carpe Diem CS40075, RCS Nanterre 315 268 664, Siret 315 268 664 00143;
- For the Help Centre accessible on the Edenred Website: PREMIUM PLUS SPRL, a Belgian company whose registered office is located at 9170 Sint-Gillis-Waas (Belgium) and registered with the Crossroads Bank for Enterprises under number 0844.776.562;

#### 46. Data transfer

The processing does not involve any transfer of personal data to a country that is not a member of the European Economic Area.

#### 47. Decision based exclusively on automated processing, including profiling

The processing does not involve any decision based exclusively on automated processing, including profiling.

## 48. Retention period

Personal data are retained for a period of 5 years.

- Security

## 49. Purpose

Edenred Belgium processes personal data of Users in order to guarantee the security of their personal data and in particular for the purpose of prevention, detection and circumvention of faults and fraud.

## 50. Legal basis of the processing

This processing is necessary for the legitimate interests pursued by Edenred Belgium in connection with the purpose of the processing.

## 51. Data source

The personal data concerned are communicated by the Users.

## 52. Categories of data processed

The personal data communicated by the companies granting ERBE Vouchers concerning the beneficiaries thereof:

- identification data:
  - mandatory data: last name, first name, address, national register number;
  - optional data: landline and/or mobile phone number, email address;
- personal characteristics: age, gender, title, language;
- data relating to ERBE Vouchers associated with a Beneficiary of these vouchers : quantity, face value, validity period, point of distribution/delivery.

The personal data communicated directly by the Users, that is, as the case may be:

- identification data : last name, first name, address, company number, landline and/or mobile number, email address, username, password;
- personal characteristics: age, gender, title, language, profession;
- electronic identification data: IP addresses, cookies;
- data relating to transactions made using ERBE Vouchers ;
- data relating to the behaviour and habits of Users when using the Myedenred Website, Edenred Website and/or the Application;
- data relating to incidents that may occur while using the Myedenred Website, Edenred Website and/or the Application.

## 53. Data recipients

The personal data are exclusively intended for:

- the individuals and organisations in direct contact with Edenred Belgium requiring the data to guarantee the security of the personal data of Users;
- the Users.

They are not shared with third parties.

The processors of Edenred Belgium include:

- For application development and support: EDENRED FRANCE SAS, a French company whose registered office is located at 92240 Malakoff (France), Boulevard Gabriel Péri, 166/180, RCS Nanterre 393 365 135, Siret 393 365 135 00358;
- For the hosting information systems: DXC TECHNOLOGY FRANCE SAS, a French company whose registered office is located at 92400 Courbevoie (France), Place des Corolles, Tour Carpe Diem CS40075, RCS Nanterre 315 268 664, Siret 315 268 664 00143;
- For authorisation of transactions: PREPAY TECHNOLOGIES Ltd, an English company whose registered office is located at London W2 6HY (United Kingdom), Sheldon Square, 3, Business Number 04008083;
- For manufacturing Edenred Cards: GIESECKE & DEVRIENT GmbH, a German company whose registered office is located at 81677 Munich (Germany), Prinzregentenstraße 159, Registration number HRB 4619, VAT 129365746;
- For the Card Stop service: WORLDLINE SA, a Belgian company whose registered office is located at 1130 Haren (Brussels) (Belgium), Chaussée de Haecht, 1442 and registered with the Crossroads Bank of Enterprises under number 0418.547.872;
- For the Help Centre accessible on the Edenred Website: PREMIUM PLUS SPRL, a Belgian company whose registered office is located at 9170 Sint-Gillis-Waas (Belgium) and registered with the Crossroads Bank for Enterprises under number 0844.776.562;
- For the production of ERBE paper vouchers : EDENRED PRODUCTION CENTER, a Czech company whose registered office is located at 110 00 Prague, Na poříčí 1076/5, Nové Město (Praha 1), Business number 06678114.
- For marketing activities: SELLIGENT BENELUX SA, a Belgian company whose registered office is located at 3500 Hasselt (Belgium), Kempische Steenweg 305, boîte 401 and registered with the Crossroads Bank for Enterprises under number 0478.839.312.

#### **54. Data transfer**

The processing does not involve any transfer of personal data to a country that is not a member of the European Economic Area.

#### **55. Decision based exclusively on automated processing, including profiling**

The processing does not involve any decision based exclusively on automated processing, including profiling.

#### **56. Retention period**

Personal data are retained for a period of 5 to 10 years.

- Statistics

## 57. Purpose

Edenred Belgium processes the personal data of Users for research and statistical purposes, including marketing.

## 58. Legal basis of the processing

This processing is necessary for the legitimate interests pursued by Edenred Belgium in connection with the purpose of the processing.

## 59. Data source

The personal data concerned are communicated by the Users.

## 60. Categories of data processed

The personal data communicated by the companies granting ERBE Vouchers concerning the beneficiaries thereof:

- identification data:
  - mandatory data: last name, first name, address, national register number;
  - optional data: landline and/or mobile phone number, email address;
- personal characteristics: age, gender, title, language;
- data relating to Ticket Restaurant® vouchers associated with a Beneficiary of Ticket Restaurant®: quantity, face value, validity period, point of distribution/delivery.

The personal data communicated directly by Users:

- identification data: last name, first name, address, company number, landline and/or mobile number, email address, username, password;
- personal characteristics: age, gender, title, language, profession;
- electronic identification data: IP addresses, cookies;
- data relating to transactions made using Ticket Restaurant®;
- data relating to the behaviour and habits of Users when using the Myedenred Website, Edenred Website and/or the Application;
- data relating to incidents that may occur while using the Myedenred Website, Edenred Website and/or the Application.

## 61. Data recipients

The personal data are exclusively intended for:

- the individuals and organisations in direct contact with Edenred Belgium requiring the data for research and statistical purposes;
- the Users.

They are not shared with third parties.

The processors of Edenred Belgium include:

- For application development and support: EDENRED FRANCE SAS, a French company whose registered office is located at 92240 Malakoff (France), Boulevard Gabriel Péri, 166/180, RCS Nanterre 393 365 135, Siret 393 365 135 00358;
- For the hosting information systems: DXC TECHNOLOGY FRANCE SAS, a French company whose registered office is located at 92400 Courbevoie (France), Place des Corolles, Tour Carpe Diem CS40075, RCS Nanterre 315 268 664, Siret 315 268 664 00143;
- For authorisation of transactions: PREPAY TECHNOLOGIES Ltd, an English company whose registered office is located at London W2 6HY (United Kingdom), Sheldon Square, 3, Business Number 04008083;
- For manufacturing Edenred Cards: GIESECKE & DEVRIENT GmbH, a German company whose registered office is located at 81677 Munich (Germany), Prinzregentenstraße 159, Registration number HRB 4619, VAT 129365746;
- For the Card Stop service: WORLDLINE SA, a Belgian company whose registered office is located at 1130 Haren (Brussels) (Belgium), Chaussée de Haecht, 1442 and registered with the Crossroads Bank of Enterprises under number 0418.547.872;
- For the Help Centre accessible on the Edenred Website: PREMIUM PLUS SPRL, a Belgian company whose registered office is located at 9170 Sint-Gillis-Waas (Belgium) and registered with the Crossroads Bank for Enterprises under number 0844.776.562;
- For the production of ERBE paper vouchers : EDENRED PRODUCTION CENTER, a Czech company whose registered office is located at 110 00 Prague, Na poříčí 1076/5, Nové Město (Praha 1), Business number 06678114.
- For marketing activities: SELLIGENT BENELUX SA, a Belgian company whose registered office is located at 3500 Hasselt (Belgium), Kempische Steenweg 305, boîte 401 and registered with the Crossroads Bank for Enterprises under number 0478.839.312.

## 62. Data transfer

The processing does not involve any transfer of personal data to a country that is not a member of the European Economic Area.

## 63. Decision based exclusively on automated processing, including profiling

The processing does not involve any decision based exclusively on automated processing, including profiling.

## 64. Retention period

Personal data are retained for a period of 5 to 10 years.

## V. Rights of Users

- Preamble

Edenred Belgium may not refuse to comply with Users' requests under this Article V unless it can demonstrate that it is unable to identify the User concerned.

As soon as possible and at the latest within one month from the receipt of the request, Edenred Belgium provides the User exercising one or more of the rights referred to below, with information on the measures taken following the request. The one-month period can be extended by two months, given the complexity and the number of requests. In the latter case, Edenred Belgium informs the User of the extension and the reasons justifying it.

When the User makes his request in electronic form, the information is provided by Edenred Belgium electronically where possible and unless the User requests otherwise.

If Edenred Belgium does not respond to the User's request, it shall promptly inform the User, at the latest within one month from receipt of the request for reasons of this refusal and the possibility for the User to lodge a complaint with the data protection authority and a judicial appeal.

The requests under this Article V shall be free of charge except where a User's requests are manifestly unfounded or excessive, in particular because of their repetitive nature. In the latter case, Edenred Belgium may require the payment of reasonable fees that take into account the administrative costs related to these requests or refuse to act on them.

Where Edenred Belgium has reasonable doubts concerning the identity of the User making the request, may request the provision of additional information necessary to confirm the identity of the data subject.

The User has the right to lodge a complaint with the data protection authority.

- Access

The User has the right to obtain from Edenred Belgium confirmation as to whether or not the personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients outside the European Economic Area or in international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from Edenred Belgium rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- the right to lodge a complaint with the data protection authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the User.

Where the personal data are transferred to a country outside the European Economic Area or to an international organisation, the User shall have the right to be informed of the appropriate safeguards relating to the transfer.

The User has the right to obtain, free of charge, from Edenred Belgium a copy of the personal data being processed. This right, however, may not affect the rights and freedoms of others, including the trade secrets of Edenred Belgium or its intellectual property rights.

Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

Edenred Belgium may require the payment of reasonable fees based on the administrative costs, fixed at EUR 25.00, for any additional copies requested by the data subject.

- Rectification

The User shall have the right to obtain, free of charge, from Edenred Belgium the rectification of inaccurate personal data concerning him or her, without any undue delay.

Taking into account the purposes of the processing, the User shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.



- Erasure

The User shall have the right to obtain from Edenred Belgium the erasure of personal data concerning him or her without undue delay and Edenred Belgium shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the User withdraws consent on which the processing is based and where there is no other legal ground for the processing;
- the User objects to the processing pursuant hereto;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation to which Edenred Belgium is subject;
- the personal data have been collected in relation to the offer of information society services to children.

Where Edenred Belgium has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, Edenred Belgium, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the User has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing to which Edenred Belgium is subject;
- establishment, exercise or defence of legal claims;
- for statistical purposes in so far as the right to erasure is likely to render impossible or seriously impair the achievement of the objectives of that processing.

- Right to restriction of processing

The User shall have the right to obtain from Edenred Belgium restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the User, for a period enabling Edenred Belgium to verify the accuracy of the personal data;
- the processing is unlawful and the User opposes the erasure of the personal data and requests the restriction of their use instead;
- Edenred Belgium no longer needs the personal data for the purposes of processing, but they are required by the User for the establishment, exercise or defence of legal claims;
- the User has objected to processing based on Edenred Belgium's legitimate interests pending the verification whether these interests override those of the User.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the User's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

A User who has obtained restriction of processing shall be informed by Edenred Belgium before the restriction of processing is lifted.

- Notification obligation regarding rectification or erasure of personal data or restriction of processing

Edenred Belgium shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance herewith to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. Edenred Belgium shall inform the data subject about those recipients if the data subject requests it.

- Right to data portability

Subject to the rights and freedoms of third parties, the Users shall have the right to receive the personal data concerning them, which they have provided to Edenred Belgium, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from Edenred Belgium, where:

- the processing is based on consent, or on a contract; and
- the processing is performed using automated means.

In exercising his or her right to data portability, the User shall have the right to have the personal data transmitted directly from Edenred Belgium to another controller, where technically feasible.

The exercise of the right to portability of personal data is without prejudice to the provisions on the right to erasure. This right shall not apply to processing necessary for the performance of a task carried out in the public interest.

- Right to object

- Where personal data are processed **for direct marketing purposes**, the User shall have the right to object at any time to processing of personal data concerning him for such marketing, which includes profiling to the extent that it is related to such direct marketing.

When the User objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

- The User shall have the right to object, on grounds relating to his particular situation, at any time to processing of personal data concerning him which is based on **legitimate interests** pursued by Edenred Belgium.

Edenred Belgium shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the User or for the establishment, exercise or defence of legal claims.

- Automated individual decision-making, including profiling

The User shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or similarly significantly affects him, except when the decision:

- is authorised by the regulations to which Edenred Belgium is subject and which also lays down suitable measures to safeguard the User's rights and freedoms and legitimate interests; or
- is necessary for entering into, or performance of, a contract between the User and Edenred Belgium; or
- is based on the explicit consent of the User.

In the last two cases, Edenred Belgium shall implement suitable measures to safeguard the User's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of Edenred Belgium, to express his point of view and to contest the decision.