

BRS UK ONLINE PRIVACY POLICY

SODEXO builds strong, lasting relationships with its customers, partners, consumers and associates, based on mutual trust: making sure that their personal data are safe and remain confidential is an absolute priority for SODEXO.

SODEXO complies with all U.K, French and European regulatory and legal provisions on the protection of personal data.

SODEXO enforces a very strict privacy policy to guarantee protection of the personal data of those who use its websites and other applications:

- Users remain in control of their own data. The data are processed in a transparent, confidential and secure manner.
- SODEXO is committed to a continuing quest to protect its users' personal data in accordance with the Data Protection Act 1998 (hereinafter the "DPA") and the General (EU) Data Protection Regulation of April 27, 2016 (hereinafter the "GDPR").
- SODEXO has a dedicated personal data protection team comprising a Group Data Protection Officer registered with the CNIL (Commission Nationale de l'Informatique et des Libertés French Data Protection Agency) and Local Special Data Protection Point of Contact who is dedicated to personal data protection in the U.K.

PURPOSE OF THIS POLICY

SODEXO takes the protection of your personal data very seriously.

We developed this policy to inform you of the conditions under which we collect, process, use and protect your personal data. Please read it carefully to familiarise yourself with the categories of personal data that are subject to collection and processing, how we use these data and with whom we are likely to share it. This policy also describes your rights and how you can get in touch with us to exercise these rights or to ask us any questions you might have concerning the protection of your personal data.

This policy may be amended, supplemented or updated, in particular to comply with any legal, regulatory, case law or technical developments that may arise. However, your personal data will always be processed in accordance with the policy in force at the time of the data collection, unless a compulsory legal prescription determines otherwise and must be enforced retroactively.

This policy forms an integral part of the [Conditions of Use](#) of the website.

IDENTITY AND CONTACT DETAILS OF THE CONTROLLER

The personal data controller is Sodexo Motivation Solutions U.K Limited (Company No. 02620629) whose registered address is at One Southampton Row, London WC1B 5HA and trading address is at Avalon House, Breckland, Linford Wood, Milton Keynes MK14 6LD UK. The legal representative of the data controller is Jay Naido (Head of Legal and Public Affairs). Contact address as follows:

Sodexo Motivation Solutions U.K Limited

Legal Department (Sodexo BRS UK)
Avalon House,
Breckland,
Linford Wood,
Milton Keynes
MK14 6LD UK

E-mail: br.uk.gdpr.legal@sodexo.com

Telephone: +441908 352 001

DEFINITIONS

“**Personal data**” means any information relating to an identified natural person or one that can be directly or indirectly identified by reference to an identification number or to one or more factors specific to this person.

“**us**” or “**our**” Sodexo Motivation Solutions U.K Limited (hereinafter “Sodexo BRS UK”),

“**you**” any website user/visitor.

“**Website**” the website of the Sodexo BRS UK available at the address <https://sodexoengage.com>.

COLLECTION AND SOURCE OF PERSONAL DATA

We will most likely collect your personal data directly (in particular via the data collection forms on our website) or indirectly (in particular via our service providers and/or technologies on our website).

We undertake to obtain your consent and/or to allow you to refuse the use of your data for certain purposes whenever necessary.

You will in any event be informed of the purposes for which your data are collected via the various online data collection forms and via the [Cookie Policy](#).

TYPES OF PERSONAL DATA COLLECTED AND USED BY US

We may specifically collect and process the following types of personal data:

- the information that you provide when filling in the forms on the website (for example, for subscription purposes, to participate in surveys, for marketing purposes, etc.);
- the information that you provide for authentication purposes;
- the information that you provide for order fulfillment or to provide a service;
- via “posts”, comments or other content that you post on the website.

Personal data identified by an asterisk in the data collection forms are compulsory as these are necessary to fulfill any orders placed. In the absence of this compulsory information, these transactions cannot be processed.

PERSONAL DATA THAT WE AUTOMATICALLY COLLECT

We collect some information automatically when you visit the website in order to personalise and enhance your experience. We collect this information using various methods such as:

COOKIES

A “cookie” is a small information file sent to your browser when you visit our website and stored on your computer. This file contains information such as the domain name, the internet access provider and the operating system as well as the date and time of access by the user. Cookies cannot damage your computer in any way.

Cookies are not used to determine the identity of an individual who visits our website. Cookies allow us to identify, in particular, your geographic location and the display language in order to improve your online browsing experience. They also enable us to process information about your visit to our website, such as the pages viewed and the searches made, in order to improve our website content, to follow your areas of interest and offer you more suitable content.

If you do not want to receive cookies from our website, you can adjust your browser settings accordingly. To manage your choices, each browser has a different configuration. These configurations are described in your browser's help menu, which will explain how to change the settings to your desired cookies configuration.

We recommend, however, that you do not deactivate our cookies. Keep in mind that if you block, turn off or reject our cookies, some of our webpages will not display correctly or you will no longer be able to use some of the services we offer. In this case, we cannot be held liable for any consequences related to the reduced functionality of our services arising from our inability to store or consult the cookies required for its functioning and which you have declined or deactivated.

Lastly, by clicking on the dedicated icons of social networks such as Twitter, Facebook, LinkedIn, etc., if these are displayed on our website, and if you have agreed that cookies may be downloaded while you are browsing our website, the social networks in question may also download cookies to your devices (computer, tablet or mobile phone). These types of cookies are downloaded to your device only on condition that you have given your consent by continuing to browse our website. You can, however, at any time revoke your consent to these social networks downloading these types of cookies.

For more information, please consult our [Cookie Policy](#).

IP ADDRESSES

An IP address is a unique identifier used by some electronic devices to identify and communicate with each other on the internet. When you consult our website, we can use the IP address of the device used by you to connect you to the website. We use this information to determine the general physical location of the device and to know in which geographical areas visitors are located.

STATISTICS

The website uses Google Analytics to generate statistical reports. These reports tell us, for example, how many users consulted the website, which pages were visited and in which

geographical areas website users are located. The information gathered via the statistics may include, for example, your IP address, the website from which you arrived at our site and the type of device that you used. Your IP address is hidden on our systems and will only be used if necessary to resolve a technical problem, for website administration and to gain insight into our users' preferences. Website traffic information is only accessible to authorised staff. We do not use any of this information to identify visitors and we do not share this information with third parties.

SOCIAL NETWORKS

You have the option to click on the dedicated icons of social networks such as Twitter, Facebook, LinkedIn, etc. that appear on our website.

Social networks create a friendlier atmosphere on the website and assist in promoting the website via sharing. Video sharing services enrich the video content of our website and increase its visibility.

When you click on these buttons, we may have access to the personal information that you have made public and accessible via your profiles on the social networks in question. We neither create nor use any separate databases from these social networks based on the personal information that you have published there and we do not process any data relating to your private life through these means.

If you do not want us to have access to your personal information published in the public spaces of your profile or your social accounts, then you should use the procedures provided by the social networks in question to limit access to this information.

PURPOSES FOR WHICH WE USE PERSONAL DATA

We use your personal data specifically for the following purposes:

- to respond to your requests such as requests for information, searches, the newsletter or other content;
- to provide the services and offers ordered on our website and/or in one of our establishments;
- to conduct surveys and gather statistics;
- to personalise and enhance your experience on our website;
- to offer you our products and services and/or our partners' products and services;

- any other purpose of which we will inform you, if applicable, when we collect your data.

LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

We process your personal data as part of the performance and management of our contractual relationship with you, in our legitimate interest to improve the quality and operational excellence of the services we offer to you or in compliance with certain regulatory obligations.

Your personal data may also be processed based on your prior consent in the event that under certain circumstances, your consent would be requested.

DISCLOSURE OF PERSONAL DATA

The security and confidentiality of your personal data are of great importance to us. This is why we restrict access to your personal data only to members of our staff who need to have this information in order to process your orders or to provide the requested service.

We will not disclose your personal data to any unauthorised third parties. We may, however, share your personal data with entities within the Sodexo group and with authorised service providers (for example: technical service providers hosting, maintenance, consultants, etc.) whom we may call upon for the purpose of providing our services. We do not authorise our service providers to use or disclose your data, except to the extent necessary to deliver the services on our behalf or to comply with legal obligations. Furthermore, we may share personal data concerning you (i) if the law or a legal procedure requires us to do so, (ii) in response to a request by public authorities or other officials or (iii) if we are of the opinion that transferring these data is necessary or appropriate to prevent any physical harm or financial loss or in respect of an investigation concerning a suspected or proven unlawful activity.

STORAGE PERIOD OF YOUR PERSONAL DATA

We will store your data only for as long as necessary to fulfill the purposes for which it was collected and processed. This period may be extended, if applicable, for any amount of time prescribed by any legal or regulatory provisions that may apply.

SENSITIVE PERSONAL DATA

As a general rule, we do not collect sensitive personal data via our website. “Sensitive personal data” refers to any information concerning a person’s racial or ethnic origins, political opinions, religious or philosophical beliefs, union membership, health data or data relating to the sexual life or the sexual orientation of a natural person. This definition also includes personal data relating to criminal convictions and offenses.

In the event that it would be strictly necessary to collect such data to achieve the purpose for which the processing is performed, we will do so in accordance with local legal requirements for the protection of personal data and, in particular, with your explicit prior consent and under the conditions described in this Confidentiality Policy.

PERSONAL INFORMATION AND CHILDREN

The website is for use by adult persons who have the capacity to conclude a contract under the legislation of the country in which they are located.

Children users under the age of 16 years or without legal capacity must obtain consent from their legal guardians prior to submitting their data to the website.

The 16-year age limit may be reduced to 13 years depending on the local legislation in your usual place of residence.

TRANSFER OF PERSONAL DATA

As Sodexo is an international group, your personal data may be transmitted to internal or external recipients that are authorised to perform services on our behalf and that are located in countries outside the European Union or the European Economic Area which do not offer an adequate level of personal data protection.

To guarantee the security and confidentiality of personal data thus transmitted, we will take all necessary measures to ensure that these data receive adequate protection, such as signing standard European Commission contractual clauses or other equivalent measures.

YOUR RIGHTS

In accordance with the applicable law, you have certain rights relating to the processing of your personal data:

<p>Right of access</p>	<p>You have the right to request access to your personal data. You may also request rectification of inaccurate personal data or request that incomplete data be completed.</p> <p>You also have the right to know the source of the personal data.</p>
<p>Right of erasure</p>	<p>Your right to be forgotten entitles you to request the erasure of your personal data when:</p> <ul style="list-style-type: none"> ▪ the data are no longer necessary to achieve the purposes for which they were collected and processed; ▪ you choose to withdraw your consent (if your consent was obtained as the legal basis for processing), without such a withdrawal affecting the lawfulness of any processing carried out prior to the withdrawal; ▪ you object to the processing; ▪ your data were processed unlawfully; ▪ your data must be erased to comply with a legal obligation; or ▪ erasure of the data is required to ensure compliance with current legislation.
<p>Right to restriction</p>	<p>You may also request restriction of processing of your personal data if:</p> <ul style="list-style-type: none"> ▪ you dispute the accuracy of your data; ▪ we no longer need these data for processing purposes; and ▪ you are opposed to the processing of the data.
<p>Right to object to Processing for the purposes of direct marketing</p>	<p>You may object (right to “opt-out”) to the Processing of your Personal data (notably to profiling or to marketing communications). When we process your Personal data on the basis of your consent, you can withdraw your consent at any time.</p>

<p>The right not to be the subject of a decision based exclusively on automated data processing</p>	<p>You have the option not to be the subject of a decision based exclusively on automated processing that has legal effects concerning you or that has a significant impact on you.</p>
<p>Right of portability</p>	<p>You may request that we provide your personal data in a structured, commonly used, machine-readable format or you may request that it be transmitted directly to another controller on condition that:</p> <ul style="list-style-type: none"> ▪ the processing is based on your consent or necessary to fulfill a contract with you; and ▪ that it is done via automated means.
<p>Right to issue advanced instructions about the processing of your personal data after your death</p>	<p>In application of the Data Protection Act, you may also formulate instructions on exercising your rights as set out in this section, after your death (in particular with regard to the storage period or the erasure and/or disclosure of the data) as well as appoint a person tasked with exercising these rights.</p>
<p>Right to lodge a complaint with a supervisory authority</p>	<p>If you have a privacy-related complaint against us, you may complete and submit the Request/Complaint Form or make your complaint by email or by letter in accordance with our Global Complaints/Requests Handling Policy. If you are unsatisfied with our response, you may then seek further recourse by contacting the competent Supervisory Authority or the competent court. You can contact our lead Supervisory Authority, the French Supervisory Authority (the “CNIL”, www.cnil.fr).</p>

To exercise your rights, you can contact us by writing to us at the address br.uk.gdpr.legal@sodexo.com or mentioned above stating your surname, first name and the reason for your request. We will most likely ask you for additional information in order to identify you and to enable us to deal with your request.

SECURITY

We implement all possible technical and organisational security measures to ensure security and confidentiality in processing your personal data.

To this end, we take all necessary precautions given the nature of the personal data and the risks related to its processing, in order to maintain data security and in particular to prevent distortion, damage or unauthorised third-party access (physical protection of the premises, authentication procedures with personal, secured access via identifiers and confidential passwords, a connection log, encryption of certain data, etc.).

CUSTOMER RELATIONSHIP MANAGEMENT DATABASE [“CRM DATABASE”]

We use a database to manage and monitor our relationships with existing and potential customers. This database includes the personal data of associates of our customers or other partners with whom we have a business relationship or with whom we want to establish such a relationship. These data, used only for this purpose, notably include: contact details (surname, first name, telephone number, email address, etc.), publicly accessible information, the responses to targeted emails and other information collected and recorded by our associates as part of their interactions with our customers and partners. If you want to be removed from our CRM database, please write to address br.uk.gdpr.legal@sodexo.com or mentioned above.

LINKS TO OTHER SITES

Occasionally, we provide links to other websites for practical and informative purposes. These websites are mostly Sodexo websites and some of them operate independently from our websites and are not under our control. These websites are run by third parties with their own confidentiality recommendations or terms of use which we strongly advise you to read. We do not accept any liability with regard to the content on these sites, for the products and services that may be offered there or for any other use thereof.

UPDATES OF OUR CONFIDENTIALITY POLICY

This policy will become effective on May 25, 2018. We may update or amend this confidentiality policy as and when needed. In this case, amendments will only become

applicable after a period of 30 business days from the date of the amendment. Please consult this page from time to time if you want to be informed of any possible changes.

UNSUBSCRIBING

If you have subscribed to certain services via our website and you no longer want to receive emails, please consult the “unsubscribe” page corresponding to the service you are subscribed to.

HOW TO CONTACT US

If you have any questions or comments with regard to this policy, please do not hesitate to contact us at the following address: address br.uk.gdpr.legal@sodexo.com or contact our Group Data Protection Officer at the following address: dpo.group@sodexo.com.

Last updated: 21 May 2018