



GLOBAL DATA PROTECTION COMPLAINT/DATA SUBJECT'S REQUEST POLICY

BRS UK Version 1.0



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Sodexo Group is committed to handling Personal data in compliance with the General Data Protection Regulation (GDPR) and any other applicable law.

1. TYPES OF COMPLAINTS CONCERNED

All complaints about our Sodexo entities' processing of Personal data will be handled in line with the procedure set out below (4. Handling complaints). Non-exhaustive examples of the types of concerns likely to be raised include:

- Unfair or unlawful processing of Personal data
- Misuse of your Personal data
- Unauthorised access to your Personal data
- Loss of your Personal data.

Where a concern falls outside the scope of this complaints procedure, you will be notified of the most appropriate process to be followed.

2. YOUR RIGHTS UNDER GDPR

Sodexo is committed to ensuring protection of your rights under GDPR and any other applicable law.

Accordingly, you can request access to your Personal data. You may also request for the rectification of inaccurate Personal data, or to have incomplete data completed.

In addition, your right to be forgotten entitles you to request for the erasure of your Personal data in cases where (i) the data is no longer necessary in relation for the purposes of its collection or processing, (ii) you choose to withdraw your consent, (ii) you object to the processing by automated means using technical specifications, (iv) your Personal data has been unlawfully processed, and (v) there is a legal obligation to erase your Personal data, and (iv) erasure is required to ensure compliance with applicable laws.

You may also request for the restriction of processing, in cases where (i) you contest the accuracy of your Personal data, (b) Sodexo no longer needs the Personal data for the purposes of the processing, and (c) you have objected to the processing of your Personal data for legitimate reasons. Moreover, you are entitled to request and receive the Personal data concerning to you.



Where applicable, you may also request for the portability of the Personal data that you have provided to Sodexo, to be available in a structured, commonly used and machine-readable format or request to transmit it to a third party of your choice.

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.

3. WHAT WILL OUR TEAMS DO IF THEY RECEIVE A COMPLAINT/DATA SUBJECT'S REQUEST?

Our approach is to engage positively and resolve your complaint satisfactorily without you having to refer it to your local court or the relevant Data Protection Supervisory Authority. If you have any concerns or problems with the way in which your Personal data has been processed, you should not hesitate to raise your concern with your contact at Sodexo e.g. your manager, or your Human Resources point of contact. To help us deal with your complaint, please provide a full written explanation of your concerns by completing the <u>Complaint/Data</u> <u>Subject's Request Form</u> on *Page 5*.

4. HANDLING COMPLAINTS

At the time of drafting your complaint and to allow Sodexo to deal with your complaint promptly and efficiently, please carry out the following steps:

STEP 1: Complete and submit the <u>Complaint/Data Subject's Request Form</u> and send it to one or several of the points of contact mentioned in the form.

STEP 2: You will receive communication from Sodexo within two (2) business days acknowledging receipt of your complaint.

STEP 3: Your complaint will be treated confidentially and fully investigated where necessary. During this process, you may receive additional communications from the relevant Sodexo's Local Data Protection Special Point of Contact (Sodexo Legal Department) and/or the Global Data Protection Office to investigate your concern. If you have not provided sufficient information in your complaint, we will ask you for further information to process your complaint.

STEP 4: Once the information related to your complaint is complete, we will contact you within thirty (30) days to propose a solution. This deadline may be extended in certain circumstances, depending on the nature of the complaint. If you agree with the proposed solution, we will work



with you to close the matter. If you do not agree, the matter will be escalated to the Sodexo's Local Data Protection Special Point of Contact (Sodexo Legal Department) and/or Global Data Protection Office.

STEP 5: The Sodexo's Local Data Protection Special Point of Contact (Sodexo Legal Department) and/or Sodexo's Global Data Protection Office will take steps to resolve the matter and will contact you to propose a new solution within thirty (30) days of the escalation.

STEP 6: If the solution proposed resolves your complaint, Sodexo's Local Data Protection Special Point of Contact (Sodexo Legal Department) and the Global Data Protection Office will close the matter.

STEP 7: Should you remain unsatisfied with the outcome of the review by the Local Data Protection Special Point of Contact (Sodexo Legal Department) and Global Data Protection Office or you have not received an answer within the above-mentioned deadline, you may then seek further recourse by contacting your local Court or the relevant Data Protection Supervisory Authority.

Please note, you may also complain to a Sodexo entity established in Europe in and/or to the relevant European Supervisory Authority in the jurisdiction where the Sodexo entity concerned is responsible for processing of your Personal data. Where you have suffered damage due to non-compliance with the GDPR or the Sodexo privacy policies by a Sodexo entity based outside Europe, you may complain to Global Data Protection Office at Sodexo European headquarters, or choose to lodge your claim with the CNIL (the French Supervisory Authority covering Sodexo's global headquarters, <u>www.cnil.fr</u>) or before any other Supervisory Authority.



COMPLAINT/DATA SUBJECT'S REQUEST FORM

Note: Please send this form by email to <u>br.uk.gdpr.legal@sodexo.com</u>; this is the generic email address indicated in the information notices and/or the privacy policies provided to you at the time of the collection of your Personal data and/or to the Global Data Protection Office at the following email address: <u>dpo.group@sodexo.com</u>.

If you believe that the processing of your Personal data by Sodexo has caused you damage or has not been processed according to the General Data Protection Regulation (GDPR) or any other applicable law, you can complete this Data Protection Complaint Form.

Contact Information:

(Name (Last, First))	
(Telephone number)	🗆
(Email address)	🗆
(Postal address)	🗆

Please indicate your preferred method of contact by ticking the box to the right.

If your preferred method of contact is postal address, please indicate by ticking the appropriate box where you would like our response to be sent:

 \Box Home Address or \Box Business Address

If you ticked 'Business Address', please provide company name:

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To help us identify systems that may contain information about you, please tick the boxes below that describe your relationship with Sodexo:

- □ Job applicant
- □ Former employee or contractor
- □ Employee of Sodexo
- □ Employee family member, dependent, beneficiary or emergency contact
- □ Employee of Sodexo Client or business partner
- □ Employee of a Sodexo supplier or vendor
- □ Individual Consumer
- □ Other please describe



If your information may be under another name, please provide that name and reason for the change:

Location:
Current location (City, Country)
Origin of Personal data (City, Country)
Location of violation (City, Country)
Please present or include a certified copy of a valid official identification documentation to allow us to verify your name and address (e.g. valid passport or identity card).
If you request to access your Personal data or request for data portability, please specify the Personal data in the Request and confirm that they can be sent by email to the address above or, if technically feasible, to the address of a new Controller as set out below:
If you Request for the rectification of your Personal data, please specify the data to be rectified and provide justification for the Request below:
If you Request for the processing of your Personal data to be restricted, please specify the processing issue and provide justification for the Request:
If you Request for the erasure of your Personal data, please specify the Personal data to be deleted and provide justification for the Request below:



If you object to the processing of your Personal data, please specify the Personal data that you object to us processing and provide justification for the objection below:

In the event of a Complaint, please include a description of your complaint, including as much detail as possible to help Sodexo investigate and resolve the matter (e.g. the name of the Sodexo entity concerned, nature of the data concerned, reasons why you consider that there is a violation of the General Data Protection Regulation (GDPR) or any other applicable law). Please give details below:

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The information collected in this form is intended to enable the relevant Local Special Data Protection Point of Contact and/or the Global Data Protection Office to respond to your Complaint or Data Subject Request. They will be archived after the Complaint/Request has been treated for (6) six years and then deleted. Please send any questions relating to this Complaint/Request Form by email to <u>br.uk.gdpr.legal@sodexo.com</u>; this is the generic email address indicated in the information notices and/or the privacy policies provided to you at the time of the collection of your Personal data and/or to the Global Data Protection Office at the following email address: <u>dpo.group@sodexo.com</u>.



