



## INFORMATION ON PERSONAL DATA PROCESSING

The processing of your personal data is very important for our company, and the main priorities of our company include compliance with the principles of personal data protection. In this context, through our website, we fulfill our information obligation towards Data Subjects according to Art. 13 and Art. 14 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, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter "**GDPR Regulation**"), about the processing of your personal data, what rights you have in this regard and how you can exercise them.

### JOINT CONTROLLERS

The joint controllers of your personal data are Edenred Slovakia, s.r.o., having the registered office at Karadžičova 8, P.O.BOX 21, 820 15 Bratislava 215, company registration number (IČO): 31 328 695, a company registered in the Business Register of City Court Bratislava III, section: Sro, file no. 3169/B (hereinafter as "**Edenred Slovakia**") and Ticket Service, s.r.o., having the registered office at Karadžičova 8, 820 15 Bratislava, company registration number (IČO): 52 005 551, a company registered in the Business Register of City Court Bratislava III, section: Sro, file no. 132404/B (hereinafter as "**Ticket Service**") (Edenred Slovakia and Ticket Service hereinafter together also the "**Controller**" or "**Edenred**").

### CONTACTING THE CONTROLLER

The Controller has appointed a responsible person to supervise personal data protection for the sake of better transparency towards you as the Data Subjects. The responsible person may be contacted by e-mail at the e-mail address: [GDPR.slovakia@edenred.com](mailto:GDPR.slovakia@edenred.com) or by filling out the following form: [Data Subject's Request](#).

Both companies as Joint Controllers are responsible for exercising your rights as the Data Subject's rights, so the Data Subject's request may be addressed to either of the companies.

### PROFILING AND AUTOMATED DECISION MAKING

When processing your personal data, there is no profiling or automated decision-making about your rights and freedoms.

### RIGHTS OF DATA SUBJECTS

As a Data Subject, you have, among other things, the right to request from us for access to your personal data (Art. 15 GDPR Regulation), the right to have incorrect personal data rectified (Art. 16 GDPR Regulation), in the cases determined by law the right to erasure the personal data (so-called "right to be forgotten") (Art. 17 GDPR Regulation), in the cases provided by law the right to restrict the processing of personal data (on the basis of which the Controller shall mark the stored personal data in order to limit processing thereof in the future) (Art. 18 GDPR Regulations), the right to data portability (Art. 20 GDPR Regulation), the right to withdraw consent to the processing (if the consent of the Data Subject is the legal basis for the processing), the right to file a complaint with the supervisory authority regarding the processing of personal data (the Office for Personal Data Protection, <https://dataprotection.gov.sk>), and/or to lodge a complaint to initiate the personal data protection proceedings regarding your rights, e.g. in the case of violation of your rights as the rights of a Data Subject by the Controller.

For the purposes of processing listed below, in which a legitimate interest is the legal basis for the processing, you as the Data Subject have the right to object to the processing of personal data processed in this way, and at the same time we assure you that the Controller has assessed the

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legitimacy of their interest in a written balance test, which is part of the Controller's personal data protection system setup documentation.

### **EDENRED SLOVAKIA AND TICKET SERVICE AS A RECIPIENT**

The processing of personal data of the client's employees is based on the agreement of the client's employee as a Data Subject with their employer on the provision of a benefit, in which the employer has committed to providing the benefit. If the employee as a Data Subject has expressed an interest in the benefit, personal data is processed for the purpose of providing the benefit in connection with the provided benefit, i.e. the personal data of the employee is also transferred to another recipient, the service provider, i.e. Edenred, which provides the benefit. Normally personal data is provided to us in the scope of the name and surname of our client's employee, the employee's e-mail address and data related to the term of their employment.

### **PURPOSES OF PERSONAL DATA PROCESSING**

The information mentioned in the paragraphs above refer to all purposes which the Controller processes personal data for. In the paragraphs below, the Controller provides Information that should be provided when obtaining personal data from a Data Subject, which relates to the particular purposes of the processing (information systems) at the Controller, for which it is not possible to fulfill the information obligation jointly for all personal data information systems, but the information differ depending on the specific personal data information systems (purposes of processing).

Edenred Slovakia and Ticket Service have jointly determined the following purposes and means of the processing of the personal data of the users of products and services of the Edenred Group:

#### **Providing products and services of the Edenred Group**

**The purpose** is to provide products and services of the Edenred Group to users (clients' employees).

**The legal basis** for the processing is the Controller's legitimate interest, or the fulfillment of the contract with the client, and/or the fulfillment of the contract with the Data Subject (the Terms of Use of the Card that you have accepted). The Controller has a legitimate interest in processing personal data in connection with their business activity, as the processing is necessary for the functioning of the Controller's products and services.

**Personal data Recipients** are suppliers of related software solutions, suppliers of server solutions, suppliers of courier and postal services, service companies and the parent company.

In the event that, in legal relations, the Controller receives the personal data of Data Subjects from another Controller in connection with the establishment and/or provision of services to the Data Subject, the Controller processes common personal data such as the name, surname, employee's personal number, email address and the data on whether the Data Subject's employment to whom the benefit is to be provided is still ongoing.

When processing data on user transactions, there is **cross-border data transfer** to the supplier PrePay Technologies Ltd. – the issuer of meal cards and supplier of the software solution for processing transactions and related operations – the company is part of the Edenred Group, cross-border transfer to the UK, adequate guarantees in the form of the decision of the European Commission on the adequacy of data protection in the UK and standard contractual clauses.

**The period for which the personal data will be stored** is 10 years after the user's last financial transaction. The Controller's clients are the initial source of the data, followed by the users themselves.

**Personal data provision** is not a statutory requirement. The provision of personal data by the client (the user's employer) is a contractual requirement of the Controller, as the data is necessary for functioning of the Controller's software solutions. The provision of personal data is also a requirement necessary for concluding a contract by and between the Controller and the user's employer. If personal data is not provided, the Controller will not be able to provide the client with the services.

### Providing support for Edenred Group products and services

**The purpose** is to provide support for Edenred products and services to users, clients and partners.

**The legal basis for the processing** is the Controller's legitimate interest (as for the clients and partners as natural persons), and/or the fulfillment of the contract with the Data Subject (the Terms of Use of the Card that you have accepted). The Controller has a legitimate interest in processing personal data in connection with their business activity, as the processing is necessary for providing the Controller's support services.

**The Recipients** are the suppliers of related software solutions, server solution and the parent company.

When processing data on user transactions, **there is cross-border data transfer** to the supplier PrePay Technologies Ltd. – the supplier of the software solution for processing transactions and related operations – the company is part of the Edenred Group, cross-border transfer to the UK, adequate guarantees in the form of the decision of the European Commission on the adequacy of data protection in the UK and standard contractual clauses. At the same time, there is cross-border data transfer to the supplier Salesforce.com, Inc. Adequate transfer guarantees are represented by standard contractual clauses.

**The period for which the personal data will be stored** is 10 years after the relevant request is resolved.

**The provision of personal data** is neither a statutory requirement nor a contractual requirement, nor a requirement necessary for concluding a contract by and between the Controller and the Data Subject. If personal data is not provided, the Controller will not be able to provide the Data Subject with support for the services and products.

### Processing of clients' personal data

**The purpose** is the processing of personal data of the clients' representatives who are legal entities and clients who are natural persons for Edenred products and services.

**The legal basis for the processing** is the fulfillment of the contract with the client and the fulfillment of the contract with the Data Subject (as for natural person clients).

When processing clients' data, **there is cross-border data transfer** to the supplier Salesforce.com, Inc. Adequate transfer guarantees are represented by standard contractual clauses.

**The period for which the personal data will be stored** is 10 years after the contract with the client is terminated.

**The provision of personal data** is not a statutory requirement, the provision of data is a contractual requirement and a requirement necessary for concluding a contract with the Controller. If personal data is not provided, the Controller will not be able to conclude a contract with the client, as they will not be able to identify the client.

### Processing of partners' personal data

**The purpose** is the processing of personal data of the partners' representatives who are legal entities and partners who are natural persons for Edenred products and services.

**The legal basis of the processing** is the Controller's legitimate interest and the fulfillment of the contract with the Data Subject (as for natural person partners). The Controller has a legitimate interest in processing personal data in connection with their business activity, as the processing is necessary for the functioning of the Controller's products and services.

**The data Recipients** are the suppliers of related software solutions, suppliers of the server solution and the parent company.

When processing data on user transactions, **there is cross-border data transfer** to the supplier PrePay Technologies Ltd. – the supplier of the software solution for processing transactions and related operations – the company is part of the Edenred Group, cross-border transfer to the UK, adequate guarantees in the form of the decision of the European Commission on the adequacy of data protection in the UK and standard contractual clauses. At the same time, there is cross-border transfer of data to the supplier of the software solution for invoice registration Salesforce.com, Inc. Adequate transfer guarantees are represented by standard contractual clauses. At the same time, there is cross-border transfer to the supplier of the JIRA software solution when handling requests as part of the provision of support - Atlassian, Inc. based in the USA. Adequate transfer guarantees are represented by standard contractual clauses.

**The period for which the personal data will be stored** is 10 years after the contract with the partner is terminated.

**The provision of personal data** is not a statutory requirement, the provision of data is a contractual requirement and a requirement necessary for concluding a contract with the Controller. If personal data is not provided, the Controller will not be able to conclude a contract with the partner, as they will not be able to identify the partner.

### Processing of suppliers' personal data

**The purpose** is the processing of personal data of natural person suppliers and contact persons of the suppliers who are legal entities.

**The legal basis** for the processing is the Controller's legitimate interest. The Controller has a legitimate interest in processing personal data for the above purpose, as it is processing inextricably related to the performance of business activities.

**The data Recipient** is the supplier of archiving services.

There is **no cross-border transfer of** personal data during the processing.

**The period for which the personal data will be stored** is 10 years after the contract is terminated.

**The provision of personal data** is not a statutory requirement, the provision of data is a contractual requirement and a requirement necessary for concluding a contract with the Controller. If personal data is not provided, the Controller will not be able to identify the supplier and properly archive accounting records.

### **Participation in tenders and public procurement**

**The purpose** is the processing of personal data for the purpose of a tender and fulfilling of orders in public procurement, including data on the Controller's references.

**The legal basis for the processing** is the Controller's legitimate interest and the consent of the Data Subject (in the case of references). The Controller has a legitimate interest in processing personal data in connection with their business activity, as the processing is necessary for taking part in public procurement.

**The data Recipients** are supervisory authorities and contracting authorities.

There is no **cross-border transfer of data** during the processing.

**The period for which the personal data will be stored** is 10 years after the awarded contract is terminated.

**The provision of personal data** to the contracting authority is a statutory requirement, a contractual requirement, and a requirement necessary for concluding a contract by and between the Controller and the contracting authority. If personal data is not provided, the Controller will not be able to take part in public procurement.

### **Legal agenda**

**The purpose** is the processing of personal data related to the Controller's legal agenda, which can include, in particular, the agenda related to contracts, dispute agenda, communication with public authorities, agenda related to personal data protection, anti-social activity and registry matters.

**The legal basis for the processing** is the Controller's legitimate interest and the fulfillment of the Controller's statutory obligations according to the relevant legal regulations. The Controller has a legitimate interest in processing personal data in connection with their business activity, as the processing is necessary for exercising their rights and defending the rights and legally protected interests of the Controller.

**The data Recipients** are the suppliers of related software solutions, suppliers of legal services, public authorities and the parent company.

There is **no cross-border transfer of data** during the processing.

**The period for which the personal data will be stored** is 10 years after the termination of the contract, judicial, administrative or other proceedings.

**The provision of personal data** is not a statutory requirement, the provision of data is neither a contractual requirement nor a requirement necessary for concluding a contract with the Controller. If personal data is not provided, the Controller will not be able to identify the Data Subjects for the purposes of the Controller's legal agenda.

### **Proving, exercising or defending legal claims**

**The purpose** of the processing is to protect our rights in administrative, judicial or criminal proceedings (for example, if you fail to comply with your obligations or believe that Edenred is failing to comply with its contractual or legal obligations). This processing purpose applies, for example, in litigation, claims proceedings or debt recovery.

**The legal basis** for the processing is the legitimate interest of the controller. The controller has a legitimate interest in processing personal data for the above purpose, as it is processing which is intrinsically linked to the pursuit of business activities.

**The recipients** are mainly suppliers of legal services and similar services, public authorities and the parent company.

There is **no cross-border transfer of data** during the processing.

**The period for which the personal data will be stored** is 10 years after the termination of the contract, judicial, administrative or other proceedings.

**The provision of personal data** is not a statutory requirement, the provision of data is neither a contractual requirement nor a requirement necessary for concluding a contract with the Controller. If personal data is not provided, the Controller will not be able to identify the Data Subjects for the purposes of the Controller's to proving, exercising or defending legal claims.

### **Accounting and tax matters and financial controlling**

**The purpose** is the processing of personal data related to the Controller's statutory obligation to keep accounts, file tax returns and the processing of personal data related to the partners and users' financial transaction check.

**The legal basis of the processing** is the Controller's legitimate interest and the fulfillment of the statutory obligations according to the relevant legal regulations. The Controller has a legitimate interest in processing personal data in connection with their business activity, as the processing is necessary for proving proper accounting of particular users' transactions.

**The data Recipients** are suppliers of related software solutions, suppliers of archiving services, suppliers of payroll accounting services, suppliers of advisory and consulting services, auditors, public authorities and the parent company.

When processing data on user transactions, **there is cross-border data transfer** to the supplier PrePay Technologies Ltd. – the supplier of the software solution for processing transactions and related operations – the company is part of the Edenred Group, cross-border transfer to the UK, adequate guarantees in the form of the decision of the European Commission on the adequacy of data protection in the UK and standard contractual clauses.

**The period for which the personal data will be stored** is 10 years after the relevant transaction or after the creation or due date of the accounting entry.

**The provision of personal data** for accounting and tax purposes is a statutory requirement, the provision of data is neither a contractual requirement nor a requirement necessary for concluding a contract with the Controller. If personal data is not provided, the Controller will not be able to fulfill their statutory obligations properly.

## HR

In addition to the processing of personal data of the employees to whom the information obligation is fulfilled individually, the Controller as an employer also processes the data of other persons that are related to the fulfillment of the obligations of the Controller as an employer, or whose data the Controller encounters when fulfilling their goals when building a team of employees. **For the above purposes**, in addition to employee data, the Controller also processes data on employees' family members and other persons, for example employees' contact persons in case of emergency (emergency contacts) or participants in events or competitions organized by the Controller.

**The legal basis for the processing** is the Controller's legitimate interest. The Controller has a legitimate interest in the aforementioned processing, as it is processing important for building a high-quality employee team and important for ensuring the continuity of the Controller's activities.

**The data Recipients** are public authorities, insurance companies, pension funds, the Statistical Office, suppliers of the software solution for the employee social network and the supplier of the software solution for competitions and event attendance recording.

When processing data related to competitions and events, **there is cross-border transfer** of personal data to the USA, where the supplier of the software solution for the employee social network and the supplier of the software solution for competitions and event attendance recording are located. Adequate transfer guarantees are represented by standard contractual clauses.

**The period for which the personal data will be stored** varies according to the particular processing purposes. As for competitions, the data is stored within 1 month after the competition is evaluated. As for data published on the Controller's social network, the data is stored for 2 years, other data is stored for 1 year. Data on the employee's emergency contact is stored for the term of the employee's employment.

**The provision of personal data** about family members is a statutory requirement in the case of using the data for tax benefits, in other cases the provision of data is not a statutory requirement, a contractual requirement or a requirement necessary for concluding a contract with the Controller. In the event that the personal data is not provided, the Controller will not be able to



fulfill the particular purpose of the processing that it pursues (e.g. family members will not be able to take part in competitions and events of the Controller).

### **Processing of personal data of job applicants**

**The purpose** is the processing of personal data of job applicants.

**The legal basis for the processing** is processing before concluding a contract with the Data Subject, and in some cases also the consent of the Data Subject.

**The data Recipients** are the suppliers of recruitment and selection services and the supplier of the software solution for records of the employees of the Group.

During processing, **there is cross-border transfer** to the USA when using the software solution for employee records to the supplier of that solution. Adequate transfer guarantees are represented by standard contractual clauses.

As for unsuccessful applicants, the **period for which the personal data will be stored** is 2 years after the last job application.

**The provision of personal data** is not a statutory requirement, the provision of data is not a contractual requirement. The provision of data is a requirement necessary for concluding a contract with the Controller. If personal data is not provided, the Controller will not be able to assess the applicant's suitability for the job.

### **Edenred Group**

**The purpose** is the processing of personal data about shareholders, members of the company's bodies and employees of other companies of the Edenred Group for the purpose of exchanging information necessary for the operation of the Group.

**The legal basis for the processing** is the Controller's legitimate interest. The legitimacy of the Controller's interest in processing personal data for the above purpose follows directly from the recitals of the GDPR Regulation.

**The data Recipients** are the other companies of the Edenred Group and the suppliers of the software solution for the records of the employees of the Group.

During processing, **there is cross-border transfer of** personal data to the countries where the individual companies that are part of the Edenred Group are based. There is also cross-border transfer to the USA when using the software solution for employee records to the supplier of that solution. Adequate transfer guarantees are represented by standard contractual clauses.

**The period for which the personal data will be stored** is 10 years after termination of the employment with the employee of the Group.

**The provision of personal data** is not a statutory requirement, the provision of data is a contractual requirement and a requirement necessary for concluding a contract with the Controller. In the



event that personal data is not provided, the Controller will not be able to exchange the data necessary for operation of the Group between the individual companies of the Group effectively.

### Marketing

**The purpose** is the processing of personal data for the purposes of marketing the Controller's activities. Marketing communication can be aimed at users of Edenred products and services, clients, partners or the general public, through competitions, marketing surveys, acquisition activities, building public opinion or through marketing communication.

**The legal basis for the processing** is the Controller's legitimate interest and also the consent of the Data Subject in some cases. The Controller has a legitimate interest in processing personal data in connection with their business activity, as the processing is important for further development of the Controller's business activities. The data Recipients are suppliers of related software solutions, suppliers of server solutions, call center, operators of social networks on which the Controller has an account, survey suppliers, suppliers of contact details of potential customers and the supplier of technical support for marketing activity through social networks.

When processing data, **there is cross-border transfer** of data by the operators of the social networks - Facebook Ireland Ltd., LinkedIn Ireland Unlimited and the supplier of the software solution for surveys- Alchemer, LLC. There is cross-border transfer of data to the USA as part of cooperation with the above companies. Adequate transfer guarantees are represented by standard contractual clauses.

**The period for which the personal data will be stored** is, as for marketing communication, 5 years after sending a marketing e-mail, as for competitions until the evaluation of the particular competition, as for surveys within 1 year after the survey, as for acquisition activities until the recommended person's interest in the Controller's services and products is ascertained, as for marketing through social networks, the data is stored according to the settings of the particular social network.

**The provision of personal data** for the marketing purpose is neither a statutory requirement nor a contractual requirement, nor a requirement necessary for concluding a contract with the Controller. In the event that personal data is not provided, the Controller will not use the above mentioned data for their marketing activities.

In the case of marketing communication carried out on the legal basis of legitimate interest, **the Data Subjects may object to data processing** by sending an e-mail to the address: [GDPR.slovakia@edenred.com](mailto:GDPR.slovakia@edenred.com). The Data Subjects are also informed about the right to object when sending each marketing e-mail, by unsubscribing from the newsletter.

In the case of marketing communication carried out on the legal basis of the consent of the **Data Subject, the consent can be revoked at any time** either by changing the settings in the applications or by sending an e-mail to the address: [GDPR.slovakia@edenred.com](mailto:GDPR.slovakia@edenred.com).

### Testing of software solutions and reporting

**The purpose** is the processing of personal data when testing software solutions when deploying a new solution or when changing an existing solution and preparing group (bulk data) reports on transactions with partners.

**The legal basis for the processing** is the Controller's legitimate interest. The Controller has a legitimate interest in processing personal data in connection with their business activity, as the processing is important for analyzing the functioning of the Controller's software solutions.

**The data Recipients** are the suppliers of related software solutions, the supplier of the server solution and the parent company.

**There is cross-border data transfer** when processing requirements as part of providing support, as the JIRA software from the supplier Atlassian, Inc. based in the USA is used. Adequate transfer guarantees are represented by standard contractual clauses.

**The period for which the personal data will be stored** is 10 years after the activity of the relevant virtual card finishes.

**The provision of personal data** is not a statutory requirement, the provision of data is neither a contractual requirement nor a requirement necessary for concluding a contract with the Controller. If personal data is not provided, the Controller will not be able to analyze the functioning of their software solutions properly.

### Public relations

**The purpose** is the processing of personal data for the purpose of monitoring the Controller's legislative position and the legislative development of the Controller's position, public opinion polls and representing the Controller in a public forum.

**The legal basis for the processing** is the Controller's legitimate interest. The Controller has a legitimate interest in processing personal data for the above purpose, as the processing is important for further direction of the Controller's business activities.

**The data Recipient** is the supplier of public opinion polls.

There is **no cross-border transfer of** personal data during the processing.

**The period for which the public opinion polls will be stored** is 1 year after the survey was conducted.

**The provision of personal data** is not a statutory requirement, the provision of data is neither a contractual requirement nor a requirement necessary for concluding a contract with the Controller. If personal data is not provided, the Controller will not be able to forecast the direction of their further business activities properly.

### Cameras

**The purpose** is the processing of personal data for the structure security purposes and for the purpose of protecting the Controller's property.

**The legal basis for the processing** is the Controller's legitimate interest. The Controller has a legitimate interest in processing personal data for the above purpose, as they have a legitimate interest in the protection of their premises and property.

**The data Recipients** are law enforcement authorities and labor inspection authorities.

There is **no cross-border transfer of** personal data during the processing.

The Controller informs about **the period for which the data will be stored** in the first layer of information - on notices around the monitored area.

**The provision of personal data** is not a statutory requirement, the provision of data at employees' work with stamps and vouchers is a contractual requirement and a requirement necessary for concluding a contract with the Controller. If personal data is not provided, the Controller will not be able to protect their property properly.

### Registry management

**The purpose** is the processing of personal data for archiving purposes after the primary purpose of processing was fulfilled.

**The legal basis of the processing** is the Controller's legitimate interest and the fulfillment of the Controller's statutory obligation. The Controller has a legitimate interest in processing personal data for the above purpose, as they have a legitimate interest in keeping registry records which they may need for their business activities, even if the registry records do not have a statutory period for which they will be stored.

**The data Recipients** are public authorities and the supplier of archiving services.

There is **no cross-border transfer of** personal data during the processing.

**The period for which the personal data will be stored** varies, depending on the primary purpose of processing and depending on the particular registry record.

**The provision of personal data** for archiving and registry purposes is a statutory requirement, the provision of data is neither a contractual requirement nor a requirement necessary for concluding a contract with the Controller. In the event that personal data is not provided, the Controller will not be able to fulfill their statutory obligation to keep a registry and archive registry records.

### Correspondence

**The purpose** of the processing is the processing of the personal data of Data Subjects in requested correspondence and spam before being assigned to the relevant information system.

**The legal basis** for the processing is the Controller's legitimate interest. The Controller has a legitimate interest in processing personal data for the above purpose, as it is processing inextricably related to the performance of business activities.

**The data Recipients** are suppliers of postal and courier services and the supplier of archiving services.

There is **no cross-border transfer of** personal data during the processing.

**The period for which the requested communication will be stored** is 10 years, spam is not stored.

**The provision of personal data** is not a statutory requirement, a contractual requirement or a requirement necessary for concluding a contract with the Controller. If personal data is not provided, the Controller will not be able to identify the sender of the mail.

### Insurance claims

**The purpose** is the processing of personal data when handling insurance claims.

**The legal basis** for the processing is the Controller's legitimate interest. The Controller has a legitimate interest in processing personal data for the above purpose, as it is processing required for an insurance claim settlement.

**The data Recipients** are the relevant insurance companies and the supplier of archiving services.

There is **no cross-border transfer** of personal data during the processing.

**The period for which the personal data will be stored is** 11 years after the occurrence of the insurance claim.

**The provision of personal data** for insurance claim settlement is a statutory requirement, the provision of data is neither a contractual requirement nor a requirement necessary for concluding a contract with the Controller. If personal data is not provided, the Controller will not be able to solve the insurance claim occurred.

### Charity events

**The purpose** is the processing of personal data related to the Controller's charity events.

**The legal basis** for the processing is the Controller's legitimate interest. The Controller has a legitimate interest in processing personal data for the above purpose, as it is processing of personal data for the benefit of the Data Subject.

**The data Recipients** are the supplier of the Controller's social network, the supplier of the voting software solution related to the charitable fulfillment and the parent company.

During processing, **there is cross-border transfer** to the USA to the supplier of the social network and the supplier of the voting software solution on a charitable fulfillment. Adequate transfer guarantees are represented by standard contractual clauses.

**The period for which the personal data will be stored is** 1 month after the provision of a charitable fulfillment and 2 years as for publication of data on the Controller's social network.

**The provision of personal data** is not a statutory requirement, the provision of data is neither a contractual requirement nor a requirement necessary for concluding a contract with the Controller. If personal data is not provided, the Controller will not be able to publish data related to the charitable fulfillment on their social network.

The Controller has taken reasonable security measures to ensure the security of personal data processed in all the above-mentioned information systems and has documented the above-mentioned security measures in the company's security project.

### Multi-factor authentication

**The purpose** of processing is to increase the security of the controller's systems when approving online transactions.

**The legal basis** for the processing of personal data for the above mentioned purpose is the Controller's legitimate interest in enhancing the security of the Controller's systems. The Controller has a legitimate interest in processing of personal data for the stated purpose, as the processing is in the interest of the data subject and the processing is necessary to defend the rights and legally protected interests of the Controller and the data subjects.

**The recipients of data** are the software solution provider, the provider of the software solution for recording transactions; server solution provider, multi-factor authentication software solution providers and the supervisory bodies.

During the processing of personal data in connection with multi-factor authentication, **a cross-border transfer of data takes place** to the supplier of the software solution for multifactor authentication. The cross-border transfer is, depending on the selected solution for multi-factor authentication, to the UK and to the USA, appropriate safeguards of data protection are in the form of the decision of the European Commission on the adequacy of data protection in the UK and USA and standard contractual clauses.

During processing, an **automated decision making takes place** when the identity is being verified and authorized using a telephone number. If the data subject feels that the technical solution of the multi-factor authentication is not working and as a result of the automated decision the data subject's payment has been rejected, the data subject may contact the Controller at the e-mail address: [GDPR.slovakia@edenred.com](mailto:GDPR.slovakia@edenred.com) for the purpose of verifying the particular automated decision by an employee of the Controller.

**The storage period** is 5 years after the particular verification for the purpose of defending against potential legal claims and for the purposes of administrative and other proceedings related to the activities of supervisory authorities, considering the duration of the relevant limitation periods in connection with the carried-out transactions.

**The provision of the data** is neither a legal requirement nor a requirement necessary for concluding a contract with the Controller. The provision of the above mentioned data is a Controller's contractual requirement, with regard to the terms of use of the Controller's applications. If the personal data is not provided, the Controller will not be able to guarantee the adequate security of transactions.

### COOKIES

For the proper functioning of the website, it is sometimes necessary to place small data files, known as cookies, on your device. Cookies are small text files that websites store on your computer or mobile device the moment you start using the website. The website will remember your preferences and the actions you have taken on them for a certain period of time (e.g. login data,

language, font size and other display preferences), so you do not have to enter such data again and jump from one site to another. Such cookies come from us and we call them first-party cookies. Or we also use third-party cookies that originate from a domain different from the domain of the website you have visited, and which we use for advertising and promotion purposes.

We use cookies and other tracking technologies for the following reasons. Cookies allow us e.g. to recognize the user as an existing user or to adapt the particular service to the user preferences. We also use cookies to display so-called behaviorally targeted online advertising on the Company's web portals and outside of them, put simply, to display only such advertising that is relevant to the particular specific user without being bothered by advertising that they are not interested in.

Cookies and other elements monitoring the activity of website users can only be used with the explicit consent of Data Subjects. The mere browsing of the website by the user cannot be interpreted as their consent to the use of cookies. In other words, if the user is only given the option to accept tracking or to leave the site, the consent thus granted cannot be considered free and in compliance with law. As users, you have the option to refuse the use of cookies. However, it is possible that in some cases it will not be possible to display a certain service or product of ours without the use of cookies.

If your browser allows the use of cookies, we will assume that you consent to the use of standard cookies by our websites.

The Edenred company processes cookies on the following websites: edenred.sk, edenred.benefitcafe.sk, benefitcafe.sk, edenredbenefity.edenred.sk, rychlaojednavka.sk, mojedenred.sk, myedenred.sk.

When you visit any websites, it is likely that the website will collect or store information on your browser, usually in the form of cookies. This may be information about you, your preferences and the devices you use. This is mostly used to improve the website so that it works as you expect. As a general rule, the information does not identify you as an individual, but in general it can help tailor the environment to your needs. We respect your right to privacy, so you can decide not to accept some cookies. When you click on the different titles, you will learn more and be able to change the settings. But don't forget that by blocking some cookies, you can affect how the website works and what services are offered to you.

### **How third-party cookies are used**

On our websites, in addition to the use of cookies by our company Edenred, we also allow certain third parties (for example the website administrators, Google, Google Analytics, Youtube, Facebook, LinkedIn) to place their cookies on your computer and have access to them. The use of cookies by these companies is governed by their own privacy policies, not Edenred's privacy policies.

On their websites, Edenred uses Google Analytics cookies by Google, Inc., having the registered office at 1600 Amphitheater Parkway, Mountain View, California, the United States of America (hereinafter referred to as "Google"). You can find more about the processing and use of data in the Information on the Processing of Personal Data of Google: Privacy Policy – Privacy & Terms – Google.

On their websites, Edenred uses cookies by YouTube, having the registered office at 901 Cherry Avenue, San Bruno, California, the United States of America (hereinafter referred to as "Youtube"). You can find more about the processing and use of data in the Information on the Processing of Personal Data of Youtube: Privacy settings on YouTube - How YouTube works.

On their websites, Edenred uses cookies by Facebook, having the registered office at 1 Hacker Way, Menlo Park, California, the United States of America (hereinafter referred to as "Facebook").

You can find more about the processing and use of data of Facebook in the Information on the Processing of Personal Data of Facebook: Facebook.

On their websites, Edenred uses cookies by LinkedIn, having the registered office at 1000 W Maude Ave, Sunnyvale California, the United States of America (hereinafter referred to as "LinkedIn"). You can find more about the processing and use of data of LinkedIn in the Information on the Processing of Personal Data of LinkedIn: LinkedIn Privacy Policy.

## What cookies do we use?

### 1. Necessary cookies

They are necessary for the website to work, so they cannot be turned off. They are usually set in response to actions you have taken, such as requesting services related to security settings, logging in, filling out forms, etc. You can set your browser to block cookies or send notifications about them. Keep in mind that some sites will not work without these files. These cookies do not store any personally identifiable information.

### 2. Performance-related cookies

They help track the number of visitors and also what source the traffic is coming from, which allows us to improve the website performance. We can use them to determine which sites are the most popular and which are not, and also monitor how visitors move around the website. All information that cookies collect is aggregated and anonymous. If you do not allow cookies, we will not know when you visited our website.

### 3. Functionality-related cookies

These cookies make the website more productive and personal. They may be set by us or by third-party providers whose services we use on the websites. If you do not allow the cookies, some or all of such services may not function properly.

### 4. Cookies for targeting

These cookies may be set by advertising partners on our website. They can use them to create profiles about your interests and show you ads also on other websites based on them. However, they do not store your personal information directly, but through the unique identifiers of the browser and Internet device. If you do not allow them, you will be shown less targeted advertising on the websites.

### 5. Cookies related to social networks

The cookies are set by social media services that we have added to the website so that you can share our content with friends and other networks. They have the ability to track your browser on other websites too and build a profile with an overview of your interests. This may affect the content and messages that appear on other websites you visit. If you do not allow such cookies, these sharing tools may not appear or function.

## How to control and delete cookies

If you do not want information to be collected through cookies, click on the shield icon at the bottom of the website. Alternatively, you can find more information about managing cookies at: [www.allaboutcookies.org/manage-cookies/](http://www.allaboutcookies.org/manage-cookies/). If you refuse the use of cookies, some functions of the website may not work properly.