

# DATA PROTECTION POLICY IN THE CONTEXT OF B2B RELATIONSHIPS

Version 2, date of publication may 13, 2025

#### **PURPOSE**

Edenred Belgium attaches great importance to the protection of the personal data it processes as a controller during its activities, including in the context of business-to-business relationships.

Processing refers to all operations applied to data which directly or indirectly identify a natural person, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, 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").

#### **IDENTITY AND CONTACT DETAILS OF THE CONTROLLER**

**Edenred Belgium**, a limited liability company whose registered office is located at 1160 Brussels, Boulevard du Souverain, 165, box 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 Patrick Langlois, is responsible for certain processing of personal data that it carries out in the context of its business-to-business activities.

The data processing operations are as follows:

- Edenred Belgium's promotional activities towards prospects;
- Edenred Belgium's promotional activities towards its customers and merchant partners;
- Edenred Belgium's relations with its customers and merchant partners in the context of performance of contracts;
- Edenred Belgium's relations with its suppliers;
- Other processing activities: statistics, customer selections, customer documentation, compliance with any regulation/authority requirement, litigation, third party rights, restructuring, security, relations with the employees of the companies.

#### **CONTACT DETAILS OF THE DATA PROTECTION OFFICER**

Boulevard du Souverain, 165 boite 9 1160 Brussels

Email: <u>dpo.belgium@edenred.com</u>



Tel: 02/678 28 11

#### Multimodal access map (PDF).

#### **CONTACT**

For any request relating to personal data, and in particular to exercise his/her rights, the data subject may contact:

**Edenred** Belgium Privacy team Boulevard du Souverain 165, box 9 1160 Brussels

Form online: link

Phone: 02/678 28 11 - Fax: 02/678 28 28

Multimodal access map (PDF).

#### **PROCESSING**

# **Edenred Belgium's promotional activities towards prospects**

#### 1. Purpose

Edenred Belgium processes the personal data of prospects to promote Edenred Belgium and/or its products and/or its services.

Prospects are people who have expressed an interest in Edenred Belgium, its products and/or services ("connected prospects") or prospects who have no relationship with Edenred Belgium ("pure prospects").

# 2. Legal basis for processing

Edenred Belgium ensures that the prospect's consent is obtained both for the content of its promotional tools (general or personalised content) and for the means used to do so (emails, social networks, events, appointments, postal mail, personal phone calls).

When Edenred Belgium communicates personalised content based on the prospect's interests, it and its trusted third-party partners may use data enrichment and profiling techniques involving human intervention.

The prospect gives his/her specific prior consent and to each processing operation via Edenred Belgium (connected prospect) or via trusted third-party partners to whom the prospect has given permission to share his/her information with Edenred Belgium for promotional purposes (pure prospect).



The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

An unsubscribe link is included in every electronic communication sent by Edenred Belgium.

#### 3. Source of personal data

The personal data are collected:

- directly from the prospects when they use the forms on the websites and/or the applications
  of Edenred Belgium or when they contact Edenred Belgium using their contact data;
- indirectly from trusted third-party partners to whom the prospect has given consent.

# 4. Categories of data processed

The personal data directly collected from the prospects in relation with Edenred Belgium are, where applicable:

- *identification data*: last name, first name, postal address, phone number (landline or mobile), e-mail address, company name;
- personal characteristics: function, language, comments;
- electronic identification data: IP addresses, cookies;
- data relating to the behaviour and habits of prospects when they use the websites and/or applications of Edenred Belgium;
- data related to incidents that may occur during use.

The personal data indirectly collected from Edenred Belgium's trusted third-party partners for pure prospects are:

- *identification data*: last name, first name, postal address, phone number (landline or mobile), e-mail address;
- personal characteristics: title, language.

# 5. Data recipients

The personal data are exclusively intended for:

- individuals and organisations with a direct relationship with Edenred Belgium requiring the data to promote Edenred Belgium and/or its products and/or services to prospects;
- prospects;
- the authorities that require such data;
- if necessary, the professional advisers of Edenred Belgium, such as its lawyers.

They are not communicated to other than those already mentioned.

The processors of Edenred Belgium are:

• For application development and support: EDENRED SE, a company incorporated under French law, whose registered office is located at 92130 Issy-les-Moulineaux (France), 14-16 boulevard Garibaldi, R.C.S. Nanterre 493 322 978;



- For the hosting of 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, R.C.S. Nanterre 315 268 664, Siret 315 268 664 00143;
- For promotional communications: SELLIGENT BENELUX SA, a Belgian company, whose registered office is located at 3500 Hasselt (Belgium), Kempische Steenweg 305, box 401 and registered with the Crossroads Bank for Enterprises under number 0478.839.312.

#### 6. Data transfer

The processing does not involve any transfer of 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 is kept for a period of 5 years from the last contact with the prospect and, in the event of legal proceedings brought during this period, until all legal remedies have been exhausted.

# Edenred Belgium's promotional activities towards its customers and merchant partners

# 9. Purpose

Edenred Belgium processes the personal data of its customers and merchant partners to promote Edenred Belgium and/or its products and/or services.

#### 10. Legal basis for processing

This processing is necessary for the purposes of the legitimate interests pursued by Edenred Belgium when the communication takes place by e-mail or by personal phone call to promote similar products or services.

In all other cases, the customer or merchant partner gives their specific prior consent:

- where the products or services promoted are not similar;
- when Edenred Belgium communicates personalised content according to the interests of the customer or merchant partner and can as well as its trusted third party partners use data enrichment and profiling techniques involving human intervention;
- when the promotional activity takes place face-to-face (events/appointments).

The customer or merchant partner may withdraw consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent given prior to such withdrawal.

An unsubscribe link is included in every electronic communication sent by Edenred Belgium.

The customer or merchant partner may also object at any time to receiving personal phone calls for the promotion of products or services by mentioning it during the call or by contacting Edenred Belgium via the online form indicated in the contact section.



# 11. Source of personal data

The personal data concerned are provided by customers and merchant partners when they register and use the Myedenred website and/or the Myedenred application.

#### 12. Categories of data processed

The personal data communicated by customers and merchant partners using the Myedenred website and/or the Myedenred application are, where applicable:

- *identification data*: last name, first name, address, phone number (landline or mobile), email address, login, password, company name;
- *personal characteristics*: role, civility title, language;
- electronic identification data: IP addresses, cookies;
- data relating to the behaviour and habits of customers and merchant partners when using the Myedenred website and/or the Myedenred application;
- data related to incidents that may occur during their use of the Myedenred website and/or the Myedenred application.

The personal data provided by customers and merchant partners during the contracting process via the Myedenred website :

- *identification data*: last name, first name, phone number (landline or mobile), email address, company name;
- personal characteristics: function, title, language.

# 13. Data recipients

The personal data are exclusively intended for:

- individuals and organisations with a direct relationship with Edenred Belgium requiring the data to promote Edenred Belgium products and/or services;
- customers and merchant partners using the Myedenred website and/or the Myedenred application;
- the authorities that require such data;
- where applicable, for Edenred Belgium professional advisors, such as lawyers.

They are not communicated to third parties other than those already mentioned.

The processors of Edenred Belgium are, where applicable:

- For application development and support: EDENRED SE, a company incorporated under French law, whose registered office is located at 92130 Issy-les-Moulineaux (France), 14-16 boulevard Garibaldi, R.C.S. Nanterre 493 322 978;
- For the hosting of information systems: DXC TECHNOLOGY FRANCE SAS, a company incorporated under French law, whose registered office is located at 92400 Courbevoie (France), Place des Corolles, Tour Carpe Diem CS40075, R.C.S. Nanterre 315 268 664, Siret 315 268 664 00143;
- For the Help Centre: PREMIUM PLUS SRL, a company incorporated under Belgian law, with its registered office at Grote Markt 6A, 9100 Sint-Niklaas (Belgium) and registered with the Crossroads Bank for Enterprises under number 0844.776.562;



• For promotional communications: SELLIGENT BENELUX SA, a company incorporated under Belgian law, whose registered office is located at 3500 Hasselt (Belgium), Kempische Steenweg 305, box 401 and registered with the Crossroads Bank for Enterprises under number 0478.839.312.

#### 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 an automated processing, including profiling.

# 16. Retention period

The personal data of customers and merchant partners with whom Edenred Belgium has a contractual relationship is kept and access to it is limited for a period of 10 years after the end of the commercial relationship and, in the event of legal proceedings brought during this period, until all legal remedies have been exhausted.

# Edenred Belgium's relations with its customers and merchant partners in the context of the performance of contracts

#### 17. Purpose

Edenred Belgium processes the personal data of its customers and merchant partners to ensure the management of contracts, orders, receipts, invoices, payments, accounting, etc.

#### 18. Legal basis for processing

This processing is necessary for the performance of contracts between Edenred Belgium and its customers and merchant partners, or for the performance of pre-contractual measures taken at their request.

# 19. Source of personal data

The personal data concerned are provided by customers and merchant partners when they register and use the Myedenred website and/or the Myedenred application.

# 20. Categories of data processed

The personal data communicated by the customers and merchant partners using the Myedenred website and/or the Myedenred application are, where applicable:

• *identification data*: last name, first name, address, phone number (landline or mobile), email address, login, password, company name;



- Personal characteristics: role, civility title, language;
- electronic identification data: IP addresses, cookies;
- data relating to the behaviour and habits of customers and merchant partners, when using the Myedenred website and/or the Myedenred application;
- data related to incidents that may occur during the use of the Myedenred website and/or the Myedenred application.

Personal data provided by customers and merchant partners during the contracting process:

- *identification data*: last name, first name, phone number (landline or mobile), email address, company name;
- personal characteristics: function, title, language.

# 21. Data recipients

The personal data are exclusively communicated to:

- individuals and organisations with a direct relationship with Edenred Belgium requiring the data to manage contracts with customers and merchant partners;
- customers and business partners;
- the authorities that require the data;
- insurers and banks;
- where applicable, to professional advisors of Edenred Belgium such as lawyers, accountants, auditors;
- the members of the group to which Edenred Belgium belongs.

They are not communicated to third parties other than those already mentioned.

The processors of Edenred Belgium are, where applicable:

- For application development and support: EDENRED SE, a company incorporated under French law, whose registered office is located at 92130 Issy-les-Moulineaux (France), 14-16 boulevard Garibaldi, R.C.S. Nanterre 493 322 978;
- For the hosting of information systems: DXC TECHNOLOGY FRANCE SAS, a company incorporated under French law, whose registered office is located at 92400 Courbevoie (France), Place des Corolles, Tour Carpe Diem CS40075, R.C.S. Nanterre 315 268 664, Siret 315 268 664 00143;
- For the Help Centre: PREMIUM PLUS SRL, a company incorporated under Belgian law, with its registered office at Grote Markt 6A, 9100 Sint-Niklaas (Belgium) and registered with the Crossroads Bank for Enterprises under number 0844.776.562;
- For promotional communications: SELLIGENT BENELUX SA, a company incorporated under Belgian law, whose registered office is located at 3500 Hasselt (Belgium), Kempische Steenweg 305, box 401 and registered with the Crossroads Bank for Enterprises under number 0478.839.312.

### 22. Data transfer

The processing does not involve any transfer of personal data to a country outside 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

The personal data of customers and merchant partners with whom Edenred Belgium has a contractual link is kept and access to it is limited for a period of 10 years after the end of the commercial relationship and, in the event of legal proceedings brought during this period, until all legal remedies have been exhausted.

# **Edenred Belgium's relations with its suppliers**

# 25. Purpose

Edenred Belgium processes the personal data of its suppliers to ensure the management of contracts, orders, receipts, invoices, payments, accounting, etc.

#### 26. Legal basis for processing

This processing is necessary for the performance of contracts between Edenred Belgium and its suppliers or for the performance of pre-contractual measures taken at their request.

# 27. Source of personal data

The personal data concerned are communicated by suppliers via public sources and/or in the context of their contacts with Edenred Belgium and/or the Group to which it belongs.

# 28. Categories of data processed

The personal data provided by suppliers are, where applicable:

- *identification data*: last name, first name, address, phone number (landline or mobile), email address, company name;
- personal characteristics: function, title, title of civility, language.

# 29. Data recipients

The personal data are exclusively communicated to:

- individuals and organisations with a direct relationship with Edenred Belgium requiring the access to the data to manage contracts with suppliers;
- suppliers;
- the authorities that require the data.

They are not communicated to third parties other than those already mentioned.

The processor of Edenred Belgium is, if applicable:



• For the hosting of the information systems: DXC TECHNOLOGY FRANCE SAS, a company incorporated under French law, whose registered office is located at 92400 Courbevoie (France), Place des Corolles, Tour Carpe Diem CS40075, R.C.S. Nanterre 315 268 664, Siret 315 268 664 00143.

#### 30. Data transfer

The processing does not involve any transfer of personal data to a country outside 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

The personal data of suppliers with whom Edenred Belgium has a contractual link is kept and access to it is limited for a period of 10 years after the end of the commercial relationship and, in the event of legal proceedings brought during this period, until all legal remedies have been exhausted.

#### Other treatments

# 33. Purposes and legal basis of the processing

1.	To establish statistics, particularly financial and turnover statistics per customer/merchant partner, as well as marketing statistics.	Edenred Belgium has a legitimate interest in establishing analyses concerning its activities to be able to take commercial decisions.
2.	To provide selections by customer/merchant partner categories for Edenred Belgium purposes	Edenred Belgium has a legitimate interest in maintaining a list of its customers/merchant partners for the purposes of its commercial operations.
3.	To maintain documentation on customers/merchant partners.	Edenred Belgium has a legitimate interest in maintaining such documentation to conduct its business operations.
4.	To comply with any regulation, court decision, legal proceedings, or the requirements of any authority.	This processing is necessary to comply with the legal obligations of Edenred Belgium. However, where these legal obligations arise from laws that are not strictly speaking applicable, Edenred Belgium has a legitimate interest in complying with these legal obligations where failure to do so may result in sanctions or other negative consequences for its organisation or the Edenred group more generally.
5.	To assert legal rights and obligations and for any legal proceedings involving the data subject.	Edenred Belgium has a legitimate interest in protecting its organisation against any



		violation of a legal or other obligation and in defending itself in the event of a dispute.
6.	To protect the rights of third parties.	Edenred Belgium has a legitimate interest in ensuring that its activities do not violate the rights of third parties.
7.	In anticipation of and/or in connection with a business transaction such as an M&A, restructuring or sale.	Edenred Belgium has a legitimate interest in making informed decisions about the future of its organisation, with the aim of preserving and developing its business activities.
8.	To guarantee the security of personal data and in particular for the purpose of prevention, detection and circumvention of breaches and fraud.	Edenred Belgium has a legitimate interest in ensuring the security of the personal data for which it is responsible.
9.	If the data subject is employed by a prospect, customer and/or business partner and/or supplier, for the management of the relationship with the employer.	Edenred Belgium has a legitimate interest in being able to communicate with the data subject in order to maintain its commercial activities with his employer.

# 34. Source of personal data

As regards prospects, the data are communicated:

- directly by the prospect when they use the forms on the websites and/or the applications of Edenred Belgium or when they contact Edenred Belgium using their contact data;
- indirectly by trusted third-party partners to whom the prospect has given consent.

The personal data concerned are provided by customers and merchant partners when they register and use the website and/or the Myedenred application.

The personal data concerned are communicated by suppliers via public sources and/or in the context of their contacts with Edenred Belgium and/or the Group to which it belongs.

# 35. Categories of data processed

The personal data communicated are, where applicable:

- *identification data*: last name, first name, address, phone number (landline or mobile), email address, login, password, company name;
- personal characteristics: function, title, role, civility title, language, comments;
- electronic identification data: IP addresses, cookies;
- data relating to the behaviour and habits of customers and merchant partners when using the Myedenred website and/or the Myedenred application;
- data related to incidents that may occur during the use of the Myedenred website and/or the Myedenred Application .

# 36. Data recipients

The personal data are exclusively communicated, where applicable:



- to individuals and organisations with a direct relationship with Edenred Belgium requiring the data for the above-mentioned purposes;
- to prospects, customers and business partners, suppliers;
- to authorities that requires the data;
- to insurers and banks;
- as the case may be, to professional advisors of Edenred Belgium such as lawyers, accountants, auditors;
- to members of the group to which Edenred Belgium belongs.

They are not communicated to third parties other than those already mentioned.

The processors of Edenred Belgium are, where applicable:

- For application development and support: EDENRED SE, a company incorporated under French law, whose registered office is located at 92130 Issy-les-Moulineaux (France), 14-16 boulevard Garibaldi, R.C.S. Nanterre 493 322 978;
- For the hosting of information systems: DXC TECHNOLOGY FRANCE SAS, a company incorporated under French law, whose registered office is located at 92400 Courbevoie (France), Place des Corolles, Tour Carpe Diem CS40075, R.C.S. Nanterre 315 268 664, Siret 315 268 664 00143;
- For the Help Centre: PREMIUM PLUS SRL, a company incorporated under Belgian law, with its registered office at Grote Markt 6A, 9100 Sint-Niklaas (Belgium) and registered with the Crossroads Bank for Enterprises under number 0844.776.562;
- For promotional communications: SELLIGENT BENELUX SA, a company incorporated under Belgian law, whose registered office is located at 3500 Hasselt (Belgium), Kempische Steenweg 305, box 401 and registered with the Crossroads Bank for Enterprises under number 0478.839.312.

#### 37. Data transfer

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

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

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

## 39. Retention period

The personal data is kept and access to it is limited for a period of 5 years after the last contact with a prospect or 10 years after the end of the commercial relationship and, in the event of legal proceedings brought during either of these periods, until all legal remedies have been exhausted.

#### **RIGHTS OF THE DATA SUBJECTS**

#### **Preamble**



Edenred Belgium may not refuse to comply with requests from prospects, customers, merchant partners and suppliers or their employees (the "data subject" or "data subjects") to exercise the rights mentioned below, unless it can demonstrate that it is unable to identify the data subject. The identification of the data subject may in particular be carried out by means of a copy of his/her identity document.

As soon as possible and at the latest within one month from the receipt of the request, Edenred Belgium shall provide the data subject 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 number of requests. In the latter case, Edenred Belgium will inform the data subject of the extension and the reasons for it.

Where the data subject submits his or her request electronically, the information shall be provided by Edenred Belgium electronically where possible and unless the data subject requests otherwise. The request can be made via <u>this link</u>.

If Edenred Belgium does not comply with the data subject's request, it shall promptly inform the data subject, at the latest within one month from receipt of the request about the reasons of this refusal and the possibility for the data subject to lodge a complaint with the Data Protection Authority and to file a judicial recourse.

Requests made are free of charge except where a data subject's request is manifestly unfounded or excessive, particularly because of its repetitive nature. In the latter case, Edenred Belgium may require the payment of a reasonable fee that takes into account the administrative costs related to these requests or refuse to act on them.

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

The data subject has the right to lodge a complaint with the Data Protection Authority (DPA) (Art. 77 GDPR). A form is available on the DPA website: <a href="https://www.autoriteprotectiondonnees.be">https://www.autoriteprotectiondonnees.be</a>. The complaint should then be sent either by email: contact@apd-gba.be, or by post to the DPA's address: Rue de la Presse 35, 1000 Brussels.

In the event of direct marketing by personal telephone, the person concerned can register on the "Don't call me again" list so that Edenred Belgium can remove their telephone number and name from its telephone contacts, by following the link:

https://economie.fgov.be/fr/themes/ventes/publicite/communications-non-souhaitees/liste-nemappelez-plus.

#### Access

The data subject shall have 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 recipients of personal data, in particular recipients established in countries outside the European Economic Area or in international organisations;
- where possible, the period for which the personal data will be stored, or where this is 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, or the right, where appropriate, to object to such processing;
- the right to lodge a complaint with the Data Protection Authority;
- where personal data are not collected from the data subject, any available information as to their source;
- the existence, where applicable, of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved and the significance and the envisaged consequences of such processing for the data subject.

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

The data subject has the right to obtain, free of charge, from Edenred Belgium an initial copy of the personal data being processed. This right, however, may not affect the rights and freedoms of others, and in particular Edenred Belgium's trade secrets 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 a reasonable fee based on administrative costs, fixed at a flat rate of EUR 25.00, for any additional copies requested by the data subject.

# Rectification

The data subject 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 data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

#### **Erasure**

The data subject 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 such 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 data subject withdraws consent on which the processing is based and there is no other legal basis for the processing;
- the data subject objects to the processing pursuant to this policy;
- 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 personal data public and is required to erase the personal data, Edenred Belgium, taking into account the available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform the data controllers which are processing the personal data that the data subject has requested the erasure by such data controllers of any links to, or copy or replication of, those personal data.

Paragraphs 1 and 2 above 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 data subject 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 data subject, for a period enabling Edenred Belgium to verify the accuracy of the personal data;
- the processing is unlawful, and the data subject opposes the erasure 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 data subject for the establishment, exercise or defence of legal claims;
- the data subject has objected to processing based on Edenred Belgium's legitimate interests pending the verification whether these interests override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject'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.

The data subject who has obtained the 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 data subjects 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 data 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 data subject shall have the right to have the personal data transmitted directly from Edenred Belgium to another data 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 **prospection purposes**, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such prospection.

When the data subject objects to processing for prospection purposes, the personal data shall no longer be processed for such purposes.

The data subject 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 data subject or for the establishment, exercise or defence of legal claims.

# Individual decision based exclusively on automated processing, including profiling

The data subject 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 her or significantly affects him or her in a similar way except where the decision:

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

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



