

PRIVACY POLICY

Pluxee UK Ltd ("Pluxee") respects your privacy and is committed to protecting your personal data.

This Privacy Policy will explain how we look after your personal data when you visit our websites, our mobile, tablet and other applications (our "Sites"), or when we provide you Services, and tells you about your privacy rights and how the law protects you.

Please read this Privacy Policy carefully. If you do not agree with the terms of this Privacy Policy, please do not access the application by Downloading, Installing or Using the Pluxee UK Apps ("Pluxee UK Card", "Pluxee UK Discounts").

To provide our services to you and to promote, advertise, and campaign for our business in a way that best suits your needs, and to fulfil our contractual agreement, we will need to collect and process certain personal information about you.

The below table lists the content of this Privacy Policy. Please also go to the Glossary (clause 11 Glossary) herein below to understand the meaning of some of the terms used in this Privacy Policy.

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1 IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how Pluxee collects and processes your personal data through the provision of contracted services and your use of our Sites.

The use of our Sites is not intended for children, and we do not knowingly collect data relating to people under the age of 18, except in limited circumstances explained further in this Privacy Policy.

It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

Data Controller

Pluxee UK Ltd (Company No. 02680629) whose registered address is at Enigma, The Park MK, Ortensia Drive, Wavendon, Milton Keynes, MK17 8LX, is the Data Controller and responsible for your personal data (collectively referred to as "**Pluxee**", "**we**", "**us**" or "**our**" in this Privacy Policy).

Pluxee builds strong, lasting relationships with its customers, partners and consumers based on mutual trust: making sure that their Personal data is safe and remains confidential is an absolute priority for Pluxee.

We are committed to comply with all applicable regulatory and legal provisions governing the protection of your personal data. We are experts in the provision of employee benefits, rewards and recognition, and we use a number of third parties to provide the best range of benefits, discounts, offers, products and services (referred to as "**Supplier**" in this Privacy Policy) as described below.

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If you have access to our Sites, it usually means that:

- ✘ We have a contract in place with your employer or rewards provider for us to provide you with access to our Sites and services. If this is the case, then we may initially receive personal data from your employer or rewards provider for us to contact you to invite you to use our Sites and Services. We may also receive personal data from your employer or rewards provider if they request that we provide/send you with a gift card or other reward or benefit; or
- ✘ You are a member of and are benefitting from the Health Service Discounts, Discounts for Carers, Discounts for Teachers or Charity Worker Discounts ("Cashback Card"), Programmes run and managed between Network Digital Marketing Ltd ("Network" formerly trading as We Are Discounts) and Pluxee UK LTD, and for which there is a data sharing agreement in place to provide these services.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details

If you have any questions about this Privacy Policy or our privacy practices, please contact our DPO in the following ways:

Email address: privacy.uk@pluxeegroup.com

Postal address: Data Protection Officer, Enigma, The Park MK, Ortensia Drive, Wavendon, Milton Keynes, MK17 8LX

Changes to the Privacy Policy

We keep our Privacy Policy under regular review, and this policy may be amended and updated, notably to comply with any legal or technical developments that may arise. This version was last updated on 20/09/2024. It is important that the personal data we hold about

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you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Occasionally, we may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. These platforms operate independently from our Sites and are not under our control. These platforms have their own Privacy Policy or terms of use which we strongly advise you to read. We do not accept any liability with regards to the content of such platforms, for the products and services that may be offered there or for any other use.

2 THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymised data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- ✘ **“Identity Data”** includes first and last name, username or similar identifier, job title, employee number, payroll number, title, National Insurance Number, date of birth (but only the day/month), recorded voice call and if applicable for the Childcare Voucher Programme, child name, child date of birth and child carer. Identity data shall also include the picture you may opt to upload in your profile in the Recognition and Reward Platform.
- ✘ **“Contact Data”** includes billing address, delivery address, email address and telephone numbers.

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- ✘ **“Transaction Data”** includes details about payments to and from you and other details including that of products and services you have purchased on our Sites. We may also refer to this as Spending Data.
- ✘ **“Technical Data”** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our Sites.
- ✘ **“Profile Data”** includes orders and purchases made by you, your interests, preferences, feedback and survey responses.
- ✘ **“Usage Data”** includes information about how you use our Sites, products and services.
- ✘ **“Marketing and Communications Data”** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- ✘ **“User Content”** includes your reactions and comments to feeds in our Recognition and Reward Platform, and/or use the functionalities to recognise, reward and or nominate your colleague within the platform.

We may be required to collect some basic information relating to children, where you use the childcare voucher scheme, or a primary card holder permits a child (aged 13 or over) to hold a pre-payment card.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature of our Sites. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). For the purpose of providing our services, we do not collect sensitive personal data or information about criminal convictions and offences.

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If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you or your employer or reward provider, and you or your employer or reward provider fail to provide that data when requested, we may not be able to provide the services as contracted or are trying to enter into with you (for example to provide you with goods and services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

3 HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect your personal data including through:

✕ Direct interactions. You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- complete forms on our Sites,
- make a purchase or redeem products or services, rewards or benefits on our Sites,
- create an account on our Sites,
- request marketing to be sent to you,
- request information about our services be sent to you,
- enter a competition, promotion or survey; or
- subscribe to publications, and
- give us feedback or contact us.

✘ Automated technologies or interactions. As you interact with our Sites, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie Policy found at [Privacy & Cookies \(www.pluxee.uk\)](http://www.pluxee.uk) for further details.

✘ Third-parties or publicly available sources. Not all the personal information we hold about you will always come directly from you. We may also collect information from third parties such as our partners, service providers and publicly available websites (i.e., social media platforms and analytics providers), to comply with our legal and regulatory obligations, offer services we think may be of interest, to help us maintain data accuracy and provide and enhance the Services.

We will receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
 - analytics providers such as Google based inside and outside the UK,
 - advertising networks based inside and outside the UK; and
 - search information providers based inside and outside the UK.
- Contact and Transaction Data from providers of technical, payment and delivery services based inside and outside the UK.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside and outside the UK.
- Identity and Contact Data from your employer or rewards provider (as discussed above).
- If you are a member of Network, we may receive Technical Data (limited to IP address and/or an ID no.) from Network, as further explained below. Network will be acting as a data controller and their privacy policies can be found here:

<https://healthservicediscounts.com/privacy-policy>,

<https://www.discountsforteachers.co.uk/privacy-policy>,

<https://www.discountsforcarers.com/privacy-policy>, and
<https://www.charityworkerdiscounts.com/privacy-policy>

- Identity and Contact Data from credit reference agencies and other similar agencies, where applicable, for the purposes of 'know your business' and 'know your client' checks.
- Social Media. We may also collect personal information from your social media accounts if you connect with us or our services using your social media accounts, including LinkedIn, Twitter, Facebook, TikTok and Instagram

✘ In addition to the information provided to us by your employer or rewards provider, we will collect certain personal information about you when you activate your account or fill in forms on our website and/ or the Pluxee UK App, or when you contact us by phone, e-mail, online chat or otherwise. We will, therefore, retain the information provided by your employer or rewards provider to create your user profile and further information you provide to us.

✘ When we wish to send you information about our services, and you do not currently use our services, we may collect your contact details, for example, your name, email address and job title. This information may be provided directly by you, when you express interest in our website and/or the Pluxee UK App or may be obtained through third parties.

4 HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in one or more of the following circumstances:

- ✘ Where we need to perform the services contracted with a client (your employer or rewards provider) or with you.
- ✘ Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Additionally, where it is necessary

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for our legitimate interests to enrol you in the Pluxee UK Platform to provide employee- and/ membership-benefits package and your interests and fundamental rights do not override those interest. Furthermore, when it is necessary to:

- ✘ To pursue our legitimate interests (e.g. conducting our business in an efficient, compliant and profitable manner and the overall promotion of the business), and where your interests and fundamental rights do not override these interests. It may also become necessary to process your personal data for a legitimate interest of a third party, such as, your employer or rewards provider. We will also rely on our legitimate interests for the proper administration of our website and/or the Pluxee UK Apps ("Pluxee UK Card", "Pluxee UK Discounts"), and to manage our operations (for example, maintaining appropriate records and databases).
- ✘ Where we need to comply with a legal obligation.

Please see clause 11 (Glossary) below to find out more about the types of lawful basis that we will rely on to process your personal data.

Purposes for which we will use your personal data.

We have set out below, in table format, a description of all the ways we use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. If you have provided us with your individual contact details (for example, your personal email address), we will rely on your consent, unless the legal basis legitimate interest or contractual performance applies to send you marketing communications such as our newsletters and emails with information about our products and/or services. If we hold your business contact details (for example, your work email address), we will rely on the relevant legal basis, i.e. legitimate interests of the business, to send you communications, but we will always provide you with an option to opt out from future marketing communications of this kind. Please contact us at privacy.uk@pluxeegroup.com if you need details about the specific legal ground, we are relying on to process your personal data, where more than one ground has been set out in the table below.

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Purpose/ Activity	Type of Data	Lawful basis for processing data, including basis of legitimate interest.
To send you an initial service communication via electronic mail or post to invite you to register and use our Sites and services.	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to promote our Sites, products and services on our Sites to help us improve and personalise our services. To allow you to participate in interactive features of website and/ or the app when you choose to do so), and (b) To fulfil our contract with your employer or rewards provider (where applicable).
To register you as a user and create an account for you on our Site(s).	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to help us keep track of who has access to our Sites and services), and (b) Performance of a contract with you to fulfil our contract with your employer or rewards provider (where applicable)
To assess whether you are eligible for certain products and services.	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to ensure that only eligible individuals receive certain products and services).
Routine data sharing, such as credit information and Know your Business (KYB) or Know Your Customer (KYC) processes	(a) Identity (b) Contact	(a) Necessary to comply with a Legal Obligation: This may involve us sharing your personal data with credit reference agencies and similar agencies for the purposes of carrying out necessary checks including 'know your client' and 'know your business' checks.

		<p>(b) Performance of a contract with you to fulfil our contract with your employer or rewards provider (where applicable)</p> <p>(c) Necessary for our legitimate interests or the legitimate interests of a third party (to ensure that only eligible individuals receive certain products and services).</p>
<p>To provide our Sites and services to you, including providing your order (if applicable) to our Suppliers so that they can fulfil it. Most of the time you will order directly with the Suppliers</p>	<p>(a) Identity (this may include the identity of your child/children if you are using the Childcare Voucher Programme).</p> <p>(b) Contact</p>	<p>(a) Performance of a contract with you.</p> <p>(b) Necessary for our legitimate interests (ensuring that we can provide our Sites and services, performing our contract with your employer or rewards provider, and where necessary providing data to our Suppliers so they can fulfil orders)</p>
<p>To process and deliver your order (Whether that is in respect of a reward ordered by your employer or rewards provider for you; a reward you have redeemed; or a benefit or discount you have used on our Sites), including (if applicable):</p> <p>(a) Managing payments, fees and charges; and</p> <p>(b) Collecting and recovering money owed to us.</p> <p>Please note that we do not collect or store your payment card information when you make a purchase. Your payment card</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Transaction</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us, and where applicable, performing our contract with your employer or rewards provider).</p>

<p>information will be collected and processed securely by our payment provider. Our payment provider is Elavon Financial Services DAC and their Privacy Policy is available at https://www.elavon.co.uk/privacy-policy.html.</p>		
<p>To manage our relationship with you, which will include:</p> <p>(a) Notifying you about changes to our terms or Privacy Policy, (b) Asking you to leave a review or take a survey, (c) Responding to any complaints or requests made by you and investigating, resolving, reporting and/or dealing with any suspicious activity, fraud or suspected fraud; and, (d) Notifying you about changes to our services or Sites.</p>	<p>(a) Identity (b) Contact (c) Profile (d) Marketing and Communications.</p>	<p>(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services to develop and make more relevant to you and to handle your complaints and/or any suspicious or fraudulent activity effectively).</p>
<p>To enable you to leave a review, partake in a prize draw, competition or complete a survey.</p> <p>We have a legal obligation to publish the name of a prize winner of a promotion.</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Consent, as you will always have the choice to participate. (c) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and make more relevant to you, and grow our business) (d) Necessary to comply with a legal obligation.</p>
<p>To administer and protect our business and our Sites (including</p>	<p>(a) Identity (b) Contact</p>	<p>(a) Necessary for our legitimate interests (for running our business,</p>

troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(c) Technical	provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and marketing to you and measure or understand the effectiveness of the advertising we serve to you.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to define types of customers for our products and services, to study how customers use our (and our Suppliers') products/services, offers, deals, discounts, to develop them, to grow our business and to inform our marketing strategy and to understand which retailers, deals, offers, and discounts are used).
To use data analytics to improve our Sites products/services, discounts, deals, offers, marketing, customer relationships and experiences.	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our (and our Suppliers') products and services, discounts, deals, offers, to keep our Sites updated and relevant, to develop our business and to inform our marketing strategy).
To make suggestions and recommendations to you about goods or services, offers and deals that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to keep our records updated and to study how you use our (and our Suppliers') products/services, deals and discounts and offers, to develop and grow our (and our Supplier's)

		business and to make more relevant to you)
<p>To liaise with your employer or rewards partner, including to inform them as to how you are using our Sites and services.</p> <p>Further to us contacting you, and if you consent to assist us in promoting our platform in your organisation, we shall also inform your employer or rewards partner.</p> <p>We will also notify your employer or rewards partner if there is any suspected fraud or improper behaviour.</p>	<p>(a) Identity (b) Contact (c) Usage (d) Spending</p>	
<p>To profile your motivations, values and needs so that we can make the content of our marketing and communications more relevant to you, see 'Profiling' section below this table.</p>	<p>(a) Identity (b) Contact (c) Marketing and Communications (d) Spending (e) Profile</p>	<p>Necessary for our legitimate interests and (necessary for promoting our business, brand, products and services and our Suppliers')</p>
<p>To analyse your usage of our services and products to seek your occasional assistance in promoting our Services in your organisation.</p> <p>Please refer to the "Profiling" section below this table.</p>	<p>(a) Identity (b) Contact (c) Marketing and Communications (d) Spending (e) Profile</p>	<p>(a) Performance of a contract with you. (b) Necessary for our legitimate interests (necessary for promoting our business, brand, products and services and our Suppliers)</p>
<p>If you are a member of Network, you may register for Cashback Card from us directly. If you do, we will share data with Network as part of your membership with</p>	<p>(a) Identity (b) Transaction Data – this will include information about how you use your Cashback</p>	<p>(a) Performance of a contract with you as a member of Network (b) Necessary for our legitimate interests (to perform our contract with Network; and to promote and</p>

<p>them. Both Pluxee and Network will be acting as Data Controller of the personal data it receives and processes. Network's Privacy Policy is available in section 3 herein above.</p> <p>You can decide that you do not want us to share this information with Network by contacting us at: privacy.uk@pluxeegroup.com</p>	<p>Card including purchases you make, such as details of retailer, purchase amount (including Top-ups and purchases), your account balance, your Identity Data and includes any additional card issued at your request, Cashback earned and transaction date.</p> <p>The information will also include status of your application for a Card; when you receive your Card, and aggregated spending data of all cardholders.</p> <p>© Usage data (App)</p>	<p>provide our Cashback Card services)</p>
<p>To enable you and your employer or rewards partner to set up your account in our Recognition and Reward Platform. Please note that information such as your ID, Name and Picture (if uploaded) will be available for view by other users across the platform in your organisation. You can amend and manage your profile information in the Recognition and Reward Platform "Profile" section.</p>	<p>Identity</p>	<p>(a) Performance of a contract</p>
<p>To provide and administer the Recognition and Reward Platform, such as enabling you to create and share reactions and comments to</p>	<p>Content</p>	<p>(a) Performance of a contract (b) Necessary for our legitimate interests (to fulfil our contractual obligation, to study how customers</p>

feeds; and use the functionalities to recognise, reward and/or nominate your colleague.		use our products/services, assess engagement; and to develop the product).
To administer signup to Webinars	a) Identity b) Contact	Lawful basis for processing including basis of legitimate interest - Consent provided by participants during Webinar registration.

Profiling

We may from time-to-time profile your personal data to use internally to help us understand your motivations, values and needs. It will help us make the content of our marketing and communications more relevant to you.

Further to this, we may also contact you, provided you do not object to being contacted for marketing purposes, to ask you to help us promote the benefits platform in your organisation.

We use your Identity, Contact, Spending, Profile and Marketing and Communications Data to carry out profiling.

You can always object to our profiling by contacting us at privacy.uk@pluxee.com.

Unless stated otherwise in this Privacy Policy, we do not share your personal data with third parties.

Promotional offers / Marketing from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services, deals, discounts and offers may be relevant for you.

We may also use the information you provide and the information we collect about you to better understand your interests so that we may tailor our communications to you to ensure

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they are relevant and of interest to you and so that when you visit our Sites we can tailor your experience with us.

You will receive marketing communications from us (which may include third party marketing about our Suppliers) if you are an employee of an employer or a member of a membership and/or a loyalty organisation acting as your rewards provider, with whom we have a contract in place to provide you with access to our Sites and services and you have signed up to receive our services and access to our Sites and have not opted out of receiving marketing.

Processing your personal data for marketing purposes, herein we are relying on the legal basis of legitimate interests to process your personal data to provide you with the service. However, this will not affect the lawfulness of any processing carried out before you opted out from receiving marketing communications. If you opt out, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you choose to opt out. You can unsubscribe from these marketing communications at any time.

If we hold your business contact details (i.e., your work email address), we will rely on the legitimate interests of the business to send you communications, but we will always provide you with an option to opt out from future communications of this kind.

You will also receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing. We have a legitimate interest in sending this marketing (to promote our Sites and services). You will always be given the opportunity to opt out of receiving marketing communications when we first contact you. We will also remind you of the possibility to unsubscribe each time we contact you (further information in our "Opt-out" section below).

Opting out

You can ask us to stop sending you marketing messages at any time by contacting us or using the unsubscribe link in any marketing message sent to you.

Unsubscribing from marketing communications will not apply to services messages, messages sent because of the fulfilment of an order or when we are required to notify you regarding other important developments or changes.

Please note that if you unsubscribe to or opt out from direct marketing messages, and later register and provide other personal details, such as a new email address, we will rely on soft opt in, your consent and or legitimate interests to provide you with direct marketing messages, using your new email address registered with us. As per the above, you can opt out from marketing messages at any time by using the unsubscribe link in any marketing messages sent to you or by contacting us.

Network members who register for and use our Cashback Card will receive service emails from Pluxee and Cashback Card marketing from Network. You may unsubscribe from receiving marketing communications from Network by changing your membership profile preferences on their website. For more information, visit their Privacy Policy referenced in section 3 (how is your personal data collected) herein above.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Sites may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy at [Privacy & Cookies \(sodexoengage.com\)](https://www.sodexoengage.com/privacy-and-cookies).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason, and that reason is compatible

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with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us as detailed under clause 1 (important information and who we are) above.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5 DISCLOSURES OF YOUR PERSONAL DATA

We do not sell or share your personal data with third parties for them to use for marketing purposes. However, we may share your personal data with the parties set out below for the purposes set out in the table in section 4. How we use your personal data, above.

- ✘ Internal Third Parties as set out in clause 11 (Glossary).
- ✘ External Third Parties as set out in clause 11 (Glossary).
- ✘ Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy, provided it is in full compliance with the law.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

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6 INTERNATIONAL TRANSFERS

We may share your personal data within the Pluxee Group. As Pluxee is part of an international group of companies, this may involve transferring your data outside the UK to the EU.

Some of our external third parties are based outside the UK, such as suppliers providing services for our benefits platform, so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data outside of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us at privacy.uk@pluxee.com if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7 DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Nevertheless, you also have a responsibility to ensure the security and confidentiality of your personal data, so we invite you to remain vigilant, especially when using an open system such as the Internet.

8 DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider: the amount, nature and sensitivity of the personal data; the potential risk of harm from unauthorised use or disclosure of your personal data; the purposes for which we process your personal data; whether we can achieve those purposes through other means; and the applicable legal, regulatory, tax, accounting or business requirements.

In some circumstances you can ask us to anonymise your personal data, (so that it can no longer be associated with you), and in some circumstances we will anonymise your personal data for research or statistical purposes, in which case we may use this information without further notice to you.

9 YOUR LEGAL RIGHTS AND DUTIES

It is important that the personal information we hold about you is accurate and up to date. It is your duty to keep us informed of any change in your personal data changes during your relationship with us. Please keep your employer or rewards provider and/ or us informed if your personal data information changes during your relationship with us.

Under certain circumstances, you have rights under data protection laws in relation to your personal data. rights:

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✘ Request access to your personal data.

This is commonly known as Data Subject Access Request (DSAR) and it enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

✘ Request correction of the personal data that we hold about you.

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

✘ Request erasure of your personal data.

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

✘ Object to processing of your personal data. where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object, where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms.

✘ Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

✘ Request transfer of your personal data. We will provide you, or a third party you have chosen, with your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided with your consent for us to use or where we used the information to perform a contract with you.

✘ Right to opt out from marketing communications. You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can always unsubscribe from our email communications at any time by following the unsubscribe link in our email communications, or by updating your email preferences on your profile on our

website. If you wish to exercise any of the rights set out above, please contact us at: privacy.uk@pluxee.com, you may also use and fill in our Data Subject Request Form [Privacy & Cookies \(sodexoengage.com\)](#).

- ✘ **Right to withdraw your consent at any time.** You have a right to withdraw your consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- ✘ **Right to lodge a complaint.** You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk), or to seek judicial remedy. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us, as detailed under clause 1 above, in the first instance.

For more details about your rights under the Act, the rules we have to adhere to in collecting and storing your information, and how you can check your data records, please visit <https://www.gov.uk/data-protection/the-data-protection-act>.

Fees

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

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Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. THIRD PARTIES

Internal Third Parties

Other companies in the Pluxee Group and who are based in the UK and EU.

External Third Parties

- ✘ Service providers acting as processors who provide IT and system administration services.
- ✘ Payment providers – to process payments and make any refunds that may be due to you
- ✘ Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- ✘ HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- ✘ IT system providers to provide our systems including for the purposes of hosting and support.
- ✘ Digital analytics companies, such as Google Analytics, for website analytics and reporting in respect of our analytics and marketing.
- ✘ Police or other such regulatory authority as part of an investigation or otherwise for legal or regulatory purposes.
- ✘ UK law enforcement agencies and third-party security companies for the purpose of ensuring that we comply with the law and have adequate security measures in place.

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- ✘ Credit reference agencies and other similar agencies, where applicable, for the purposes of conducting 'know your business' and 'know your client' checks.
- ✘ We will disclose your personal information to other third parties if we are under a duty to disclose or share your personal data to comply with any legal or regulatory obligation or request. This includes exchanging information with other companies for the purposes of fraud protection and credit risk reduction.
- ✘ Suppliers for the purposes set out in the table above, including fulfilling your order / providing products or services to you.
- ✘ Some of our Suppliers will be acting as Data Controllers when they process your personal data and, on some occasions, you may be disclosing personal data directly to them. We will make this clear to you on the relevant pages, where a link to their Privacy Policy will be provided.
- ✘ Where you are a member of Network and obtain a Cashback Card directly from us as part of your membership, we will share data with Network as set out in the table above.

11. GLOSSARY

“Comply with a legal obligation” means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

“Consent” means freely given, specific, informed and unambiguous indication that you agree to the processing of Personal Data that relates to you.

“Legitimate Interests” means the interest of our business organisation in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are

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otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

"Performance of Contract" means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract. This also means the services we are providing to you through your Contract of Employment/ Terms of Service.