

Privacy Policy of the "Passion for Customers" program

These current rules for processing and protection of personal data in connection with the "Passion for Customers" program (hereinafter the "**Program**") are established by the joint data controllers **Edenred Bulgaria**, a joint stock company, Unified Identification Code (UIC) 130526402 (hereinafter "**Edenred**" or "**Administrator**"), having its registered seat and address of management at 1784, Sofia, Bulgaria, 137, Tsarigradsko Shausse Blvd, 3rd floor, and **EDENRED SE**, having the registered office at 14-16 Boulevard Garibaldi, 92130 Issy-les-Moulineaux, France, CRN: 493 322 978, incorporated in the Company Register of Nanterre.

The "Passion for Customers" program aims at increasing the satisfaction of Edenred's clients, partners and users (hereinafter "**Customers**") through a tool that allows Edenred to conduct surveys, analyze them and classify customer feedback so that it can be understood. To do this, this solution uses profiling, which determines what measures need to be taken in order to increase customer satisfaction.

As the Controller pursuant to Art. 13 and Art. 14 of the Regulation 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 "**the GDPR**") Edenred informs you that your personal data are processed in accordance with the GDPR Regulation and the Bulgarian Law on protection of personal data.

1. Purpose, legal basis, categories, recipient and period for which the personal data will be stored

Name of the processing purposes:

- Study of customer needs and satisfaction and trends in the range of products and services, including:
 - defining standard customer profiles and information categorization;
 - trend analysis through segmentation, filtering, profile comparison and tracking over time;
 - personalization of customer interactions, especially in terms of historical customer experience;
 - support for the identification of business opportunities based on individual feedback.
- Identification of opportunities to improve the products and services provided based on customer experience:
 - Identification of opportunities to improve the products and services provided based on customer feedback:
 - identification of the need for the operational state maintenance (search for IT incidents, checking the correct functioning of the equipment, support in troubleshooting).
- Ensuring security and traceability:
 - technical support;
 - account management and user authentication;
 - security monitoring: access and activity logging.

Legal basis:

Edenred's legitimate interest: Edenred's legitimate interest is to establish a platform for customer feedback analyzing in order to improve services provided to customers, increase customer satisfaction and identify new business opportunities.

Categories of personal data:

- **Client:** e-mail of the contact person, company name, UIC and data filled in the questionnaire.

- **Partner:** e-mail of the contact person, company name, CRN and data filled in the questionnaire
- **User:** e-mail and data filled in the questionnaire.

Recipients of personal data:

Your personal data will be accessed by Edenred authorized employees, each with reserved access rights according to the extent of their need to know the data.

Your personal data will not be disclosed to third parties, except where necessary, i.e. to the following companies, together with their own subcontractors expressly authorized by Edenred to provide the services provided: Medallia, and SaaS solution provider that provides maintenance and technical support. The recipients of the data are also the suppliers of related software solutions and the supplier of the server solution.

Period for which the personal data will be stored

Your personal data are processed and stored for 3 years. After this time, the personal data will be erased automatically.

Rights of Data Subjects

As with any other processing of personal data, you may exercise the following rights:

- right of access to personal data;
- right to rectification and/or completion;
- right to erasure personal data;
- right to restrict the processing of personal data;
- right to data portability;
- right to object.

For any additional questions regarding the manner in which personal data is processed and for exercising the rights mentioned above, please fill out the [following form](#). Your identity might need to be confirmed before we process your complaint.

In accordance with the applicable legislation we remind you that you can also lodge a complaint to The Bulgarian Data Protection Commission, (<https://www.cpdp.bg/>) located at Sofia 1592, boulevard „Professor Tzvetan Lazarov“ № 2

2. Further information on personal data processing

All personal data is processed with the highest possible protection of privacy, taking into account the organizational and technical dispositions, automatically and manually only by the relevant responsible employees of the employer who have been entrusted with these tasks.

All personal data will be stored in the Medallia's server database in Frankfurt am Main (with back-up servers in Amsterdam, the Netherlands). Edenred guarantees that your personal data collected under the Medallia system will not be transferred outside the European Union unless a decision on appropriate protection is taken by the European Commission or unless appropriate and adequate protection measures to ensure the security and protection of your personal data are implemented.