

# GLOBAL DATA PROTECTION POLICY



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SCOPE 3

COLLECTION AND PROCESSING USE OF YOUR PERSONAL DATA 3

Compliance with the European Data Protection Law and any additional applicable data protection local law 3

Lawfulness, Fairness and Transparency 3

Legitimate Purpose, Limitation and Data Minimization 4

Data Accuracy and Storage Limitation 4

SECURITY OF YOUR PERSONAL DATA 4

DISCLOSURE OF YOUR PERSONAL DATA 5

INTERNATIONAL PERSONAL DATA TRANSFERS 5

COOKIES 6

YOUR RIGHTS 6

CHILDREN 7

UPDATE 7

CONTACT US 8

DEFINITIONS 9

COMPLAINT/ DATA SUBJECT'S REQUEST FORM **ERROR! BOOKMARK NO**

*Your privacy is very important to us. We have developed this Global Data Protection Policy in order for you to understand how we collect, use, store, share, transmit, transfer, delete or otherwise process (collectively “process”) your Personal Data. This Global Data Protection Policy describes the measures we take to ensure the protection of your Personal Data. We also tell you how you can reach us to answer any questions you may have about data protection.*

## **SCOPE**

The Global Data Protection Policy applies to the global organisation of Sodexo entities (hereinafter designated as “Sodexo”) for all dimensions and activities, in all geographies where we operate.

This policy applies to the Processing of Personal Data collected by Sodexo, directly or indirectly, from all individuals including, but not limited to Sodexo’s current, past or prospective job applicants, employees, clients, consumers, children, suppliers/vendors, contractors/subcontractors, shareholders or any third parties, with “Personal Data” being defined as any data that relates to an identified or identifiable individual or a person who may be identified by means reasonably likely to be used.

In this Policy, “you” and “your” means any covered individual. “We”, “us”, “our” and “Sodexo” means the global organisation of Sodexo entities.

## **COLLECTION AND PROCESSING USE OF YOUR PERSONAL DATA**

### **COMPLIANCE WITH THE EUROPEAN DATA PROTECTION LAW AND ANY ADDITIONAL APPLICABLE DATA PROTECTION LOCAL LAW**

We are committed to complying with any applicable legislation relating to Personal Data and we shall ensure that Personal Data is collected and processed in accordance with provisions of the European Data Protection Law and other applicable local law, if any.

### **LAWFULNESS, FAIRNESS AND TRANSPARENCY**

We do not collect or process Personal Data without having a lawful reason to do so. We may have to collect and process your Personal Data where necessary for the performance of a contract to which you are party, or when it is necessary for compliance with a legal obligation to which we are subject or where required, with your prior consent. We may also collect and process your Personal Data for Sodexo’s legitimate interests except where such interests are overridden by your interests or fundamental rights and freedoms.

When collecting and processing your Personal Data, we will provide you with a fair and full information notice or privacy statement about who is responsible for the processing of your Personal Data, for what purposes your Personal Data are processed, who the recipients are, what your rights are and how to exercise them, etc., unless it is impossible or it requires disproportionate efforts to do so.

When required by applicable law, we will seek your prior consent (e.g. before collecting any Sensitive Personal Data).

## **LEGITIMATE PURPOSE, LIMITATION AND DATA MINIMISATION**

Your Personal Data is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

When Sodexo acts for its own purposes, your Personal Data is processed mainly for, but not limited to, the following purposes: recruitment management, human resources management, accounting and financial management, finance, treasury and tax management, risk management, management of employees' safety, provision of IT tools or internal websites and any other digital solutions or collaborative platforms, IT support management, health and safety management, information security management, client relationship management, bids, sales and marketing management, supply management, internal and external communication and events management, compliance with anti-money laundering obligations or any other legal requirements, data analytics operations, legal corporate management and implementation of compliance processes.

When providing our services for the benefit of our clients or between us, we may also process Personal Data on behalf of a Controller (either a client or any other Sodexo entity acting as such) essentially for the effective operation, management, performance, and delivery of our services across the globe. We will ensure that Personal Data processed is adequate, relevant, and limited to what is necessary for the purposes for which it is processed.

## **DATA ACCURACY AND STORAGE LIMITATION**

Sodexo will keep Personal Data that is processed accurate and, where necessary, up to date. Also, we only keep Personal Data for as long as necessary for the purposes for which it is processed (in accordance with our Global Data Retention Policy). Sodexo will act upon the instructions of its clients in order to assist them in complying with this obligation.

## **SECURITY OF YOUR PERSONAL DATA**

We implement appropriate technical and organisational measures to protect Personal Data against accidental or unlawful alteration or loss, or from unauthorised, use, disclosure or access, in accordance with our Group Information Security Policy.

We take, when appropriate, all reasonable measures based on Privacy by Design and Privacy by Default Principles to implement the necessary safeguards and protect the Processing of Personal Data. We also carry out, depending on the level of risk raised by the processing, a Privacy Impact Assessment (“PIA”) to adopt appropriate safeguards and ensure the protection of the Personal Data. We also provide additional security safeguards for data considered to be Sensitive Personal Data.

## **DISCLOSURE OF YOUR PERSONAL DATA**

We can, in the usual course of our business and for the purposes of the processing, share your Personal Data with the relevant personnel within the Sodexo Group, or with our duly authorised suppliers/vendors, contractors/subcontractors, to ensure consistency in our employment activities, maximize the quality and efficiency of our services and our business operations.

We may also be obliged to disclose Personal Data to regulatory authorities, courts, and government agencies where required by law, regulation or legal process, or to defend the interests, rights or property of Sodexo or related third parties.

Otherwise, we will not share your Personal Data with other parties unless you request it or have given us prior approval to such sharing.

## **INTERNATIONAL PERSONAL DATA TRANSFERS**

European Data Protection law does not allow the transfer of Personal Data to countries outside EU/EEA that do not ensure an adequate level of data protection. Some of the countries in which Sodexo operates are not regarded by European Supervisory authorities as providing an adequate level of protection for individuals’ data privacy rights.

For transfers of your Personal Data to such countries, either to entities within or outside the Sodexo Group, Sodexo has put in place other adequate safeguards to protect your Personal Data. You will be provided with more information about any transfer of your Personal Data outside of Europe at the time of the collection of your Personal Data through appropriate privacy statements.

# COOKIES

Like many companies, some of our sites may use “cookies.” Cookies are portions of text that are placed on your computer’s hard drive when you visit certain websites. We may use cookies to tell us, for example, whether you have visited us before or if you are a new visitor and to help us identify features in which you may have the greatest interest. Cookies may enhance your online experience by saving your preferences while you are visiting a website.

We will let you know when you visit our websites what types of cookies we use and how to disable such cookies. When required by law, you will have the ability to visit our websites and refuse the use of cookies at any time on your computer.

# YOUR RIGHTS

Sodexo is committed to ensure protection of your rights under applicable laws. You will find below a table summarizing your different rights:

<p><b>Right of access</b></p>	<p>You can request access to your Personal Data. You may also request rectification of inaccurate Personal Data, or to have incomplete Personal Data completed.</p> <p>You can request any available information as to the source of the Personal Data, and you may also request a copy of your Personal Data being processed by Sodexo.</p>
<p><b>Right to be forgotten</b></p>	<p>Your right to be forgotten entitles you to request the erasure of your Personal Data in cases where:</p> <ul style="list-style-type: none"> <li>(i) the data is no longer necessary;</li> <li>(ii) you choose to withdraw your consent;</li> <li>(iii) you object to the processing of your Personal Data by automated means using technical specifications;</li> <li>(iv) your Personal Data has been unlawfully processed;</li> <li>(v) there is a legal obligation to erase your Personal Data;</li> <li>(vi) erasure is required to ensure compliance with applicable laws.</li> </ul>
<p><b>Right to restriction of processing</b></p>	<p>You may request that processing of your Personal Data be restricted in the cases where:</p> <ul style="list-style-type: none"> <li>(i) you contest the accuracy of the Personal Data;</li> <li>(ii) Sodexo no longer needs the Personal Data, for the purposes of the processing;</li> <li>(iii) you have objected to processing for legitimate reasons.</li> </ul>
<p><b>Right to data portability</b></p>	<p>You can request, where applicable, the portability of your Personal Data that you have provided to Sodexo, in a structured, commonly used, and</p>

	<p>machine-readable format you have the right to transmit this data to another Controller without hindrance from Sodexo where:</p> <p>(a) the processing of your Personal Data is based on consent or on a contract; and</p> <p>(b) the processing is carried out by automated means.</p> <p>You can also request that your Personal Data be transmitted to a third party of your choice (where technically feasible).</p>
<b>Right to object to processing for the purposes of direct marketing</b>	You may object (i.e. exercise your right to “opt-out”) to the processing of your Personal Data particularly in relation to profiling or to marketing communications. When we process your Personal Data on the basis of your consent, you can withdraw your consent at any time.
<b>Right not to be subject to automated decisions</b>	You have the right not to be subject to a decision based solely on automated processing, including profiling, which has a legal affect upon you or significantly affects you.
<b>Right to lodge a complaint to the competent Supervisory Authority</b>	If you have a privacy-related complaint against us, you should complete and submit the <b><u>Complaint/Data Subjects’ Request Form</u></b> or make your complaint by email or by letter in accordance with our <b><u>Global Complaints/Requests Handling Policy</u></b> . If you are dissatisfied with our response, you may then seek further recourse by contacting the relevant local Supervisory Authority (in the UK this is the Information Commissioners Office) or the local competent court. You may also contact our lead Supervisory Authority, the French Supervisory Authority (the “CNIL”, <a href="http://www.cnil.fr">www.cnil.fr</a> ).

To exercise these rights, you can send your Request or Complaint by following the procedure set out in the privacy statements brought to your attention at the time of the collection of your Personal Data or by sending an email to the Local Special Point of Contact or to Global Data Protection Office at the following email address: [dpo.group@sodexo.com](mailto:dpo.group@sodexo.com).

## CHILDREN

Children merit specific protection with regard to their Personal Data, as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the Processing of Personal Data. Such specific protection should, in particular, apply to the use of Personal Data of children for the purposes of marketing or creating personality or user profiles and the collection of personal data with regard to children when using services offered directly to a child.

We do not collect and process Children's Personal Data without the consent of the holder of parental responsibility where required. In particular, we do not promote or market our services to Children, except for specific services and upon the consent of the holder of parental responsibility. If you believe that we have mistakenly collected a Children's Personal Data, please notify us using the contact details provided below.

## UPDATE

We may update this Global Data Protection Policy from time to time as our business changes or legal requirements change. If we make any significant changes to this policy, we will post a notice on our website when the changes go into effect, and where appropriate, send a direct communication to you about the change.

## CONTACT US

If you have questions about the collection and the processing of your Personal Data by Sodexo, you can send your questions or complaints by following the procedure set out in the privacy statements brought to your attention at the time of the collection of your Personal Data or by sending an email to your Local Special Data Protection of Contact at the following email address: [dpo.group@sodexo.com](mailto:dpo.group@sodexo.com).



# DEFINITIONS

**Complaint** means the complaint lodged by a Data Subject with a Supervisory Authority if the Data Subject considers his or her rights under Applicable Data Protection Laws are infringed.

**Controller** means the entity that determines the purposes and means of the processing of the Personal Data.

**EU/EEA** means the European Union/European Economic Area.

**European Data Protection Law or General Data Protection Regulation or GDPR** means the 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.

**Local Special Data Protection Point of Contact** means the person appointed by a Sodexo entity, in charge of handling local data privacy issues. This point of contact is part of the Global Data Protection Network.

**Personal Data** means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Processing or Processing of Personal Data** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Privacy by Design** means that where a new digital project or a new business opportunity is initiated, involving Processing of Personal data, data protection shall be taken into account, both at the time of the definition of the means and the related appropriate technical and organisational security measures for the Processing and at the time of the implementation of Processing. The same principle applies where Sodexo intends to merge with or acquire a company. Sodexo shall ensure that data protection principles are respected.

**Privacy by Default** means that personnel should be trained to handle Personal Data and implement procedures to ensure that each time Personal Data is processed, appropriate technical and organisational measures are taken for ensuring that, by default, only Personal Data which is necessary for each specific purpose is processed (in terms of amount of data processed, extent of the processing and data retention) and is made accessible only to a limited number of persons who need to know.

**Request** means one of the mechanisms provided by the GDPR to individuals to allow them to exercise their rights (such as the right of access, to rectification, to erasure etc.). An individual may make a Request against any Controller or the Processor which processes its Personal Data.

**Sensitive Personal Data** designated as "Special Categories of Data" under the GDPR means any Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union memberships and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. This definition includes also Personal Data relating to criminal convictions and offences.

**Sodexo Group** means the network of entities comprising (i) four Global Hubs including Sodexo Global Services LLC in the USA, Sodexo Global Services Limited in the UK, Sodexo Services Asia in Singapore and Sodexo SA in France (collectively “the Hubs” or “the Global Hubs”) hosting Global management functions of the Sodexo Group, Global functions of the OSS activity and some Global functions of the PHS and BRS activities; (ii) the Region Leading Entities (“RLEs”) managing one of the various Regions of the OSS activity; (iii) the Management Company, Sodexo Pass International (“SPI”) incorporated in France and hosting some global management support functions of the PHS and BRS activities, (iv) the Operational companies which are in charge of conducting the Group’s daily business in the OSS, BRS or PHS activity and, any entities which are directly or indirectly controlled by or under the common control with any of those entities. “Control” in the context of this definition means the power, either directly or indirectly to direct or cause the direction of the management and policies of an entity.

**Sodexo entity or Sodexo entities** means any corporation, partnership or other entity or organisation which is admitted from time to time as member of the Sodexo Group.

**Supervisory Authority** means an independent public authority which is established by a Member State as specified in the GDPR.

# COMPLAINT/DATA SUBJECTS' REQUEST FORM

[To be sent by email at the generic email address as indicated in the information notices and/or the privacy policies provided to you at the time of the collection of your Personal Data and/or to the Global Data Protection Office at the following email address: [dpo.group@sodexo.com](mailto:dpo.group@sodexo.com)]

If you believe that you have somehow been prejudiced by Sodexo's processing of your Personal Data or your Personal Data has not been processed according to the General Data Protection Regulation (GDPR) or any other applicable law, you can fill out the present Data Protection Complaint Form.

## Contact Information:

(Name (Last, First)) .....

(Telephone number) .....

(Email address) .....

(Postal address) .....

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

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

Home Address or  Business Address

If business address, please provide company name: .....

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In order to help us identify systems that may contain information about you, please check the boxes below that describe your relationship with Sodexo:

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

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

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Location:

Current location (City, Country) .....

Origin of Personal Data (City, Country).....  
Location of incident giving rise to the complaint (City, Country) .....

Please present or include a certified copy of a valid official identification documentation to allow us to verify your name and address (e.g. valid passport or identity card).

If you request to access your Personal Data or request data portability, please specify the Personal Data which is subject to the Request and confirm that they may be sent by email to the address above or, if technically feasible, to the address of a new Controller as set out below, for the Data Portability Request:

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If you Request rectification of your Personal Data, please specify below the Personal Data to be rectified, and provide the justification for such Request:

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If you Request that the processing of your Personal Data is restricted please specify the processing in issue, and provide the justification for such Request:

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If you Request the erasure of your Personal Data, please specify below the Personal Data to be deleted and provide the justification for such Request:

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

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

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*The information collected in this form is intended to enable the relevant Local Special Data Protection Point of Contact and/or the Global Data Protection Office to respond to your Complaint or Data Subject Request. They will be archived after the Complaint/Request has been treated for (05) five years and then deleted. For any question related to this Complaint/Request Form, please send your request at the following email address: [dpo.group@sodexo.com](mailto:dpo.group@sodexo.com).*