

Privacy Policy

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PURPOSE OF THIS POLICY

Sodexo takes the protection of your personal data very seriously.

We developed this policy to inform you of the conditions under which we collect, process, use and protect your personal data. Please read it carefully to familiarize yourself with the categories of personal data that are subject to collection and processing, how we use these data and with whom we are likely to share it. This policy describes how you can get in touch with us on any questions you might have concerning your personal data.

This policy may be amended, supplemented or updated, in particular to comply with any legal, regulatory, case law or technical developments that may arise. However, your personal data will be processed in accordance with the policy in force at the time of the data collection, unless a compulsory legal prescription determines otherwise and must be enforced retroactively.

For California Residents, please visit <https://us.sodexo.com/legal--privacy/california-consumer-privacy-act.html> for a summary of your data rights.

DEFINITIONS

“Personal data”	means any information relating to an identified natural person or one that can be directly or indirectly identified by reference to an identification number or to one or more factors specific to this person. Personal Data will share the same definition as “Personally Identifiable Information.”
“us” or “our”	those entities of Sodexo that are based in the United States or Canada (hereinafter designated as “Sodexo”) for all dimensions and activities.
“you”	any website or application user/visitor.
“Website”	means either (1) the website where this privacy policy appears at the footer or (2) the Application where this policy is linked.

COLLECTION AND SOURCE OF PERSONAL DATA

We use Personal Data to operate, administer and improve the Website, deliver the services or carry out the transactions you have requested, improve our services, provide you with more effective customer service, perform research and analysis aimed at improving our products, services and technologies, satisfy our legitimate business interests (including performing trend analysis and market studies), set prices, accomplish the billing function, display content and advertising that are customized to your interests and preferences, and comply with government regulations. We also use personal information about you to communicate with you about the Website, transactions with you, and additional products and services you may find of value. To do all of this, we combine personal and non-personal information, collected online and offline, including information from third party sources.

We will most likely collect your personal data directly (via the data collection forms on our Website) or indirectly (via our service providers and/or technologies on our Website).

We undertake to obtain your consent and/or to allow you to refuse the use of your data for certain purposes whenever necessary.

You will in any event be informed of the purposes for which your data are collected via the various online data collection forms and via the [Cookie Policy](#).

SOCIAL NETWORKS

You have the option to click on the dedicated icons of social networks such as Twitter, Facebook, LinkedIn, etc. that appear on our Website. Clicking on those links or enabling those connections may allow the social network to collect or share data about you. We do not control these third-party websites and we encourage you to read the privacy notice of every website you visit.

Social networks create a friendlier atmosphere on the Website and assist in promoting the Website via sharing. Video sharing services enrich the video content of the Website and increase its visibility.

When you click on these buttons, we may have access to the personal information that you have made public and accessible via your profiles on the social networks in question. We neither create nor use any separate databases from these social networks based on the personal information that you have published there and we do not process any data relating to your private life through these means.

If you do not want us to have access to your personal information published in the public spaces of your profile or your social accounts, then you should use the procedures provided by the social networks in question to limit access to this information.

LINKS TO OTHER SITES

Occasionally, we provide links to other websites for practical and informative purposes. These websites are mostly Sodexo websites, however some of them operate independently from our websites and are not under our control. These websites are run by third parties with their own confidentiality recommendations or terms of use which we strongly advise you to read. We do not accept any liability with regard to the content on these sites, for the products and services that may be offered there or for any other use thereof.

TYPES OF PERSONAL DATA COLLECTED AND USED BY US

We may specifically collect and process the following types of personal data:

- Registration information you provide when you create an account;
- Information that you provide for authentication purposes;
- Information that you provide when filling in the forms on the Website (for example, for subscription purposes, to participate in surveys, for marketing purposes, etc.);
- Transaction information you provide when you request information or purchase a product or service from us, such as your postal address, telephone number, and payment information;
- Usage, viewing, technical, and device data when you visit our Website, use our applications on third-party sites or platforms, or open emails we send, including your browser or device type, unique device identifier, search queries, and IP address; and
- Records and copies of your correspondence (including email addresses), if you contact us.

Personal data identified by an asterisk in data collection forms are compulsory as these are necessary to fulfill any orders placed. In the absence of this compulsory information, these transactions cannot be processed.

PERSONAL DATA THAT WE AUTOMATICALLY COLLECT

We collect some information automatically when you visit the Website to personalize and enhance your experience. We collect this information using various methods such as:

Cookies

A “cookie” is a small information file sent to your browser when you visit our Website and stored on your computer. This file contains information such as the domain name, the internet access provider and the operating system as well as the date and time of access by the user. Cookies cannot damage your computer in any way.

Cookies are not used to determine the identity of an individual who visits our Website. Cookies allow us to identify, in particular, your geographic location and the display language in order to improve your online browsing experience. They also enable us to process information about your visit to our website, such as the pages viewed and the searches made, in order to improve our Website content, to follow your areas of interest and offer you more suitable content.

If you do not want to receive cookies from our Website, you can adjust your browser settings accordingly. To manage your choices, each browser has a different configuration. These configurations are described in your browser’s help menu, which will explain how to change the settings to your desired cookies configuration.

We recommend, however, that you do not deactivate our cookies. Keep in mind that if you block, turn off or reject our cookies, some of our webpages will not display correctly or you will no longer be able to use some of the services we offer. In this case, we cannot be held liable for any consequences related to the reduced functionality of our services arising from our inability to store or consult the cookies required for its functioning and which you have declined or deactivated.

Lastly, by clicking on the dedicated icons of social networks such as Twitter, Facebook, LinkedIn, etc., if these are displayed on our Website, and if you have agreed that cookies may be downloaded while you are browsing our Website, the social networks in question may also download cookies to your devices (computer, tablet or mobile phone). These types of cookies are downloaded to your device only on condition that you have given your consent by continuing to browse our Website. You can, however, at any time revoke your consent to these social networks downloading these types of cookies.

For more information, please consult our [Cookie Policy](#).

IP addresses

An IP address is a unique identifier used by some electronic devices to identify and communicate with each other on the internet. When you consult our Website, we can use the IP address of the device used by you to connect you to the Website. We use this information to determine the general physical location of the device and to know in which geographical areas visitors are located.

Statistics

The Website uses Google Analytics to generate statistical reports. These reports tell us, for example, how many users consulted the Website, which pages were visited and in which geographical areas Website users are located. The information gathered via the statistics may include, for example, your IP address, the Website from which you arrived at our Website and the type of device that you used. Your IP address is hidden on our systems and will only be used if necessary to resolve a technical problem, for Website administration and to gain insight into our users' preferences. Website traffic information is only accessible to authorized staff. We do not use any of this information to identify visitors and we do not share this information with third parties.

Automatic Information Collection and Tracking

When you download, access, and use the Website, it may use technology to automatically collect:

- **Usage Details.** When you access and use the Website, we may automatically collect certain details of your access to and use of the Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on or through the Website.
- **Device Information.** We may collect information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number.
- **Stored Information and Files.** The Website also may access metadata and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips, personal contacts, and address book information.
- **Location Information.** This Website collects real-time information about the location of your device.

If you do not want us to collect this information do not download the application, delete it from your device, or you may opt out at any time by changing your device settings related to this Website through your device, for example, by turning off location services for the Website. Note, however, that opting out of the Website's collection information may disable some of its features.

PURPOSES FOR WHICH WE USE PERSONAL DATA

We use your personal data specifically for the following purposes:

- to present our Website and its contents to you;
- to respond to your requests such as requests for information, searches, the newsletter or other content;
- to provide the services and offers ordered on our Website and/or in one of our establishments;
- to conduct surveys and gather statistics;
- to notify you when Website updates are available, and of changes to any products or services we offer or provide though it.
- to offer you our products and services and/or our partners' products and services; and
- any other purpose of which we will inform you, if applicable, when we collect your data.

LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA

We process your personal data as part of the performance and management of our contractual relationship with you, in our legitimate interest to improve the quality and operational excellence of the services we offer to you, or in compliance with certain regulatory obligations.

Your personal data may also be processed based on your prior consent in the event that under certain circumstances, your consent would be requested.

DISCLOSURE OF PERSONAL DATA

The security and confidentiality of your personal data are of great importance to us. This is why we restrict access to your personal data only to members of our staff who need to have this information in order to process your orders or to provide the requested service.

We will not disclose your personal data to any unauthorized third parties. We may, however, share your personal data with entities within the Sodexo group and with authorized service providers (for example: technical service providers hosting, maintenance, consultants, etc.) whom we may call upon for the purpose of providing our services. We do not authorize our service providers to use or disclose your data, except to the extent necessary to deliver the services on our behalf or to comply with legal obligations. Furthermore, we may share personal data concerning you (i) if the law or a legal procedure requires us to do so, (ii) in response to a request by public authorities or other officials or (iii) if we are of the opinion that transferring these data is necessary or appropriate to prevent any physical harm or financial loss or in respect of an investigation concerning a suspected or proven unlawful activity.

We may partner with third parties to provide advertisements to visitors through the Website. These third parties are only provided the information necessary to perform their services and are only permitted to use such information for the provision of such services. We may also aggregate general statistics that we gather about visitors, sales, traffic patterns, and services and provide these statistics to third parties; however, when we do, these statistics will not include any personal information that identifies individuals.

You also may provide information to be published or displayed (hereinafter, "posted") on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to others at your own risk. Please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

STORAGE PERIOD OF YOUR PERSONAL DATA

We will store your data only for as long as necessary to fulfill the purposes for which it was collected and processed. This period may be extended, if applicable, for any amount of time prescribed by any legal or regulatory provisions that may apply.

PERSONAL INFORMATION AND CHILDREN

The Website is for use by adult persons who have the capacity to conclude a contract under the legislation of the country in which they are located.

This Website is not directed towards children under 16 years of age. No one under age 16 may provide any information to the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website or through any of its features/register on the Website, including your name, address, telephone number, or email address. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at privacy.noram@sodexo.com.

TRANSFER OF PERSONAL DATA

As Sodexo is an international group, your personal data may be transmitted to internal or external recipients that are authorized to perform services on our behalf and that are located in countries outside the country where data was collected (such as in the United States or Canada). In the event that personal data is transferred internationally, the government, courts, law enforcement or regulatory agencies of the transferred to jurisdiction may be able to obtain disclosure of the data through the laws of that jurisdiction.

To guarantee the security and confidentiality of personal data thus transmitted, we will take appropriate measures to ensure that these data receive adequate protection, such as signing standard European Commission contractual clauses or other equivalent measures.

REQUESTS

If you have questions about use of your personal data or a request regarding your personal data, you can contact us by writing to us at the following address - privacy.noram@sodexo.com. Please state your last name, first name and provide your question or request. We will most likely ask you for additional information in order to identify you and to enable us to handle your request.

If you are dissatisfied with our response, you may then seek further recourse by contacting the competent Supervisory Authority or the relevant competent court. You may also contact our lead Supervisory Authority, the French Supervisory Authority (the "CNIL", www.cnil.fr).

SECURITY

We implement reasonable technical and organizational security measures to ensure security and confidentiality in processing your personal data.

To this end, we take all necessary precautions given the nature of the personal data and the risks related to its processing, in order to maintain data security and in particular to prevent distortion, damage or unauthorized third-party access (physical protection of the premises, authentication procedures with personal, secured access via identifiers and confidential passwords, a connection log, encryption of certain data, etc.). We also request that our third-party service providers use commercially reasonable security measures to protect your information from unauthorized access or use.

However, no method of electronically transmitting or storing data is ever completely secure, and therefore, we cannot guarantee that your information will never be accessed, used, or disclosed in a manner that is inconsistent with this Privacy Policy.

UNSUBSCRIBING

If you have subscribed to certain services via our Website and you no longer want to receive emails, please consult the "unsubscribe" page corresponding to the service you are subscribed to.

HOW TO CONTACT US

If you have any questions or comments with regard to this policy, please do not hesitate to contact us at the following address privacy.noram@sodexo.com.