

Speak Up Hotline Data Protection Statement



Pluxee Speak Up hotline data protection (English)

Effective date: 1 February 2024

✘ This Speak Up Hotline (“Hotline”) Data Protection Statement (“Statement”) sets out our general approach to dealing with the personal data collected from you or otherwise received by Pluxee International (“we”, “us”, “Pluxee”) for the implementation and the management of the Hotline, where it is stored, how it is protected and used, and who will have access to it and for what purposes. If there is any conflict between this Statement and the data protection laws in your country, then such laws, where applicable, will prevail.

What is the hotline?

- ✘ The Hotline is a voluntary, confidential web and phone-based intake system operated by Convercent, an independent service provider, and provided by Pluxee to its employees and suppliers’ employees.
- ✘ Access to the personal data processed through the Hotline is limited to Pluxee authorized persons on a need-to-know basis (e.g., users who are granted with an access for managing and investigating the reported cases). Security and access rights are strictly managed in accordance with pre-defined user requirements. The system will limit user access to only the content and services to which the user is entitled.

Who operates the hotline?

- ✘ PLUXEE INTERNATIONAL SAS, a company existing and organized under the laws of France, registered at the Registry of Commerce and Companies of Nanterre under the number RCS B 350 925 384 R.C.S. Nanterre, acts as the Controller at a group level pursuant to its acceptance under French Data Protection Law.

What personal data is collected?

- ✘ We collect and process some limited personal data that may be shared by you such as: your name, your contact details, the name and other personal data of the

persons you name in your report, and a description of the alleged misconduct as well as a description of the circumstances of the alleged incident.

- ✘ Please be aware that the information you supply about yourself, your colleagues, or any aspect of Pluxee's operations may result in decisions that affect others. Therefore, we ask that you only provide information that, to the best of your knowledge, at the time when the information is provided, is correct, factual and useful for the investigation that will be managed. You will not be subject to disciplinary or adverse action by Pluxee for any report of a suspected legal or compliance violation that is made in "good faith", even if it later turns out to be incorrect. Acting in "good faith" means acting with an honest belief and intention. Please be aware that knowingly providing false or misleading information will not be tolerated.

Is it mandatory that I provide personal data to the hotline?

- ✘ Use of the Hotline is entirely voluntary. As a reminder, the normal route for reporting a possible violation is to escalate it to your manager or to a representative of the HR, Ethics, or Legal Departments.
- ✘ In the event that you are unable, or unwilling, to discuss such issues with your managers then the Hotline has been set up to allow employees to report any irregularities or illegal actions witnessed or suspected, which may threaten to damage Pluxee's business or otherwise cause harm to the workplace.
- ✘ Pluxee does not encourage anonymous reporting and in some countries, such entirely anonymous reports are not allowed. However, if requested, the report to our service provider may be made on an anonymous basis, to preserve the identity of the individual(s) making the report, subject to local legal restrictions. Please review your local policy for further information.

How and for which purposes will the personal data collected be used?

- ✘ We may process, use and disclose your personal data, for managing the Hotline, for handling and, if necessary, investigating the alleged facts in your report.
- ✘ The alleged facts can be related to (i) a crime or an offense; (ii) a serious and manifest violation of an international commitment duly ratified or approved by France; (iii) a serious and manifest violation of a unilateral act of an international organization taken on the basis of a regularly ratified international commitment; (iv) a serious and manifest violation of a law or a regulation; or (v) a serious threat or damage to the public interest, of which the person reporting the alleged facts has personal knowledge.

On which legal basis will my personal data be collected and processed?

- ✘ We may have to collect and process your Personal data where necessary for compliance with a legal obligation to which Pluxee is subject as well as Pluxee's legitimate interests (like for instance, legitimate interest in ensuring the health and security of its employees and the integrity, the reputation and the economic and financial health of Pluxee International) except where such interests are overridden by your interests or fundamental rights and freedoms.

To whom will the personal data be disclosed?

- ✘ Your personal data will only be available to the persons, within Pluxee or external third parties, who need such access for the purposes listed above or where required by law.
- ✘ The main categories of data recipients are the following (without this list being exhaustive): authorized internal users, third-party service providers or other contractors (with whom Pluxee has signed Data Processing Agreements) who process personal data on behalf of Pluxee and, as the case may be, judicial and regulatory authorities.
- ✘ Different access levels are applied to data captured by the Hotline to ensure that such data is visible only to appropriate users who need such access for the purposes listed above or where required by law.
- ✘ The personal data will be disclosed and transferred to a third-party service provider which is involved in the provision of the Hotline. This third-party service provider has been engaged under a binding confidentiality agreement with Pluxee International, whereby said third-party may act only upon the instructions of Pluxee International. Relevant personnel have been trained and authorized to manage and support the Hotline.
- ✘ This third-party service provider and/or other contractors, as the case may be, may be located in third countries (such as the United States), which data protection laws may not provide a level of protection equivalent to French data protection law. If Pluxee International discloses your personal data to such recipients, we will establish and/or confirm that, prior to receiving any of your personal data, they will provide an adequate level of protection for your personal data including appropriate technical and organizational security measures. In particular, if the recipients concerned are located in a country that does not

provide an adequate level of protection (as this is the case in the United States), Sodexo SA will also rely on appropriate legal mechanisms, the relevant standard contractual clauses published by the European Commission, and the required supplementary measures to secure such transfer, in compliance with French data protection law. If you want to access a copy of the relevant standard contractual clauses, please send an email to the Global Data Protection Office at the following email address dpo@pluxee.com

How will my personal data be protected?

- ✘ We implement appropriate technical and organizational measures to protect Personal data against accidental or unlawful alteration or loss, or from unauthorized, use, disclosure or access, in accordance with our Group Information & Systems 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 personal data processing. We also carry out, depending on the level of risk raised by the processing, a privacy impact assessment 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.

How can I access my personal data?

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

Right of access

You can request access to your Personal data. You may also request rectification of inaccurate Personal data, or to have incomplete Personal data completed.

You can request any available information as for instance to the source of the personal data, and you may also request a copy of your Personal data being processed by Pluxee.

Right to be forgotten

Your right to be forgotten entitles you to request the erasure of your Personal data in cases where:

- (i) the data is no longer necessary in relation for the purposes of its collection or processing;
- (ii) you choose to withdraw your consent;

Right to restriction of processing

(iii) you object to the processing by automated means using technical specifications;
 (iv) your Personal data has been unlawfully processed;
 (v) there is a legal obligation to erase your Personal data;
 (vi) erasure is required to ensure compliance with applicable laws.

You may request the restriction of processing in the cases where:

(i) you contest the accuracy of the personal data;
 (ii) Pluxee no longer needs the personal data, for the purposes of the processing;
 (iii) you have objected to processing for legitimate reasons.

Right to data portability

You can request, where applicable, the portability of your Personal data that you have provided to Pluxee, in a structured, commonly used, and machine-readable format you have the right to transmit this data to another Controller without hindrance from Pluxee where:

a) the processing of your Personal data is based on consent or on a contract; and
 b) the processing is carried out by automated means.

You can also request to transmit directly your Personal data to a third party of your choice (where technically feasible).

Right to object to processing for the purposes of direct marketing

You may object (right to “opt-out”) to the processing of your Personal data (notably 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.

Right not to be subject to automated decisions

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

Right to lodge a complaint to the competent supervisory authority

If you have a privacy-related complaint against us, you may complete and submit the **Request/Complaint Form (available in our Global Data Protection Policy)** or make your complaint by email or by letter in accordance with our **Global Requests and Complaints Handling Policy**. If you are unsatisfied with our response, you may then seek further recourse by contacting the competent Supervisory Authority or the competent court. You can notably contact our lead Supervisory Authority, the French Supervisory Authority (the “CNIL”, www.cnil.fr).

To exercise these rights, you can send your Request or Complaint by sending an email to your local data protection special point of contact or the Group Data Protection Officer at the following email address dpo@pluxeegroup.com.

How long will my personal data be held?

- ✘ Generally, the personal data collected through the Hotline and the further information processed for handling and, if necessary, investigating the alleged facts in your report will be deleted within two months of completion of the investigation, unless legal proceedings or disciplinary measures are initiated as a consequence of the report. This data retention period may be different from country to another, upon applicable local law, and may be affected by specific regulatory or legal obligations for particular regulations.

How will I be notified if the uses of my data change?

- ✘ If the use of your personal data in the Hotline significantly change, we will issue an updated Statement and/or take other steps to notify you beforehand of such changes so that you may review them and check whether they are acceptable (to the extent necessary) to you.
- ✘ If you require further information about this Statement, please contact the Global Data Protection Office at the following email address: dpo@pluxeegroup.com
- ✘ If you require further information about the Hotline, please contact your local System Administrator at speakup.group@pluxeegroup.com

Who is my local system administrator?

If you should require any further information concerning this Statement and/or the Hotline, please contact the department in charge of the helpline at speakup.group@pluxeegroup.com



Thank you!