

Sodexo Apple Pay Privacy Policy

Sodexo Motivation Solutions U.K. Limited (**we**) are committed to protecting and respecting your **privacy**.

SCOPE OF POLICY

This **policy** (together with our end-user licence agreement as set out at <https://www.apple.com/legal/sla/> (**EULA**) and any additional terms of use incorporated by reference into the EULA, together **our Terms of Use**) applies to your use of:

- Digital wallet Apple mobile application software (**App**) available on our site or hosted on] <https://www.apple.com/legal/sla/>(**App Site**), once you have downloaded or streamed a copy of the **App** onto your mobile telephone or handheld device (**Device**).
- Any of the services accessible through the **App (Services)** that are available on the **App Site** or other sites of ours (**Services Sites**), unless the EULA states that a separate **privacy policy** applies to a particular Service, in which case that **privacy policy** only applies.

This **policy** sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it.

For the purpose of the Data Protection Act 1998, the data controller is Sodexo Motivation Solutions U.K. Limited (02680629) of One, Southampton Row, London, WC1B 5HA whose trading is at Avalon House, Breckland, Linford Wood, Milton Keynes, Buckinghamshire, MK14 6LD.

INFORMATION WE COLLECT FROM YOU

1.1 We will collect and process the following data about you:

- **Information you give us (Submitted information)**: This is information you give us about you by filling in forms on the **App Site** and the **Services Sites** (together **Our Sites**), or by corresponding with us (for example, by e-mail or chat). It includes information you provide when you register to use the **App Site**, download or register an **App**, subscribe to any of our **Services**, search for an **App** or **Service**, make an in-**App** purchase, share data via an **App's** social media functions, enter a competition, promotion or survey and when you report a problem with an **App**, our **Services**, or any of our **Sites**. If you contact us, We will keep a record of that correspondence. The information you give us may include your name, address, e-mail address and phone number, the **Device's** phone number, age, username, password and

- other registration information including push notifications, financial and credit card information and tracking your transaction activity at retailers including when we provide customer service.
- **Information we collect about you and your device.** Each time you visit one of our Sites or use one of our **Apps** we will automatically collect the following information:
 - technical information, including the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use and time zone setting (**Device Information**);
 - information stored on your Device, including login information or other digital content and check ins (**Content Information**);
 - details of your use of any of our **Apps** or your visits to any of Our Sites including, but not limited to traffic data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access (**Log Information**).
 - **Location information.** We also use GPS or other technology to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by turning off the location services on your device through app or in your device settings.
 - **Information we receive from other sources (Third Party Information).** We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.
 - **Unique application numbers:** when you install or uninstall a Service containing a unique application number or when such a Service searches for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.

COOKIES

We use cookies to distinguish you from other users of the **App**, **App Site**, Appstore or Service Site. This helps us to provide you with a good experience when you use the **App** or browse any of the sites and also allows us to improve the **App** and Our sites. For detailed information on the cookies We use and the purposes for which We use them.

Some business partners (e.g., advertisers, tracking utilities) use cookies and web beacons on their site(s). We do not have access or control over these tracking technologies. We do not share your personal data with these advertisers.

This policy covers the use of cookies on this App, App Site or Service Site. It does not cover the use of cookies by any third parties. For more information about cookies, including further details as to what they are and how to refuse them, please visit www.allaboutcookies.org.

DIRECT MARKETING

For you to successfully make use of this App, we may need to send you system generated emails. Other marketing type emails may contain an opt-out facility.

OPTING-OUT

You may opt out of correspondence relating to the use of this App or App Site by using the Contact Us facility on this App, Service Site and App Site.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

Submitted Information:

We may share your personal data with our associated companies, and service providers and agents acting under our instructions.

We will collect and use your personal data to verify your card(s) and to facilitate your use of App Services once you've registered your card as an App .

If you've switched on location services, App providers may see your locational data. For more information, please see App provider Privacy Policy.

Your transactional data may be shared with VISA, the Digital Wallet provider and our processor FIS, so they can process the transaction and support the Digital Card provision.

We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this **policy** for as long as it is combined.

We do not disclose information about identifiable individuals to our advertisers, but We may provide them with anonymous aggregate information about our users (for example, We may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We will use of the personal data We have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

DISCLOSURE OF YOUR INFORMATION

We will disclose the data we collect from you to the following third parties:

Category of data	Recipient	Purpose
Personal	FIS and Sodexo	We will collect and use your personal data to verify your card(s) and to facilitate your use of Digital Wallet Services once you've registered your card as a Digital Card.
Transactional	Digital wallet providers (Apple and google), FIS, Sodexo and Visa	Your transactional data may be shared with VISA, the Digital Wallet provider and our processor FIS, so they can process the transaction and support the Digital Card provision.

<p>Device</p>	<p>Digital wallet providers (Apple and google), FIS, Sodexo and Visa</p>	<p>If you've switched on location services, Digital Wallet Providers may see your locational data. For more information, please see Digital Wallet Provider Privacy Policy.</p> <p>We will collect your device identifies your device and may share this information with our third parties, in order to provide you will the Digital Wallet service.</p>
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You agree that we have the right to disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006.

We will disclose your personal information to third parties:

- In the event that We sell or buy any business or assets, in which case We will disclose your personal data to the prospective seller or buyer of such business or assets.
- If any company substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If We are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.
- In order to:
 - enforce or apply the EULA, Our Terms of Use, terms and conditions of supply (available on the programme website) and other agreements or to investigate potential breaches; or
 - protect the rights, property or safety of Imagor SA, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

The data that We collect from you will be transferred to, and stored at, a destination within the European Economic Area (**EEA**). It will also be processed by staff operating within the EEA who work for us or for one of our suppliers. These staff may be engaged in the fulfilment of your request, order or reservation, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this **privacy policy**.

All information you provide to us is stored on our secure servers. Any payment transactions carried out by us or our chosen third-party provider of payment processing services will be encrypted using Secured Sockets Layer technology. Where We have given you (or where you have chosen) a password that enables you to access certain parts of Our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do our best to protect your personal data, We cannot guarantee the security of your data transmitted to Our Sites; any transmission is at your own risk. Once We have received your information, We will use strict procedures and security features to try to prevent unauthorised access. Please contact us if you require a copy of our security procedure.

We will collect and store personal data on your Device using application data caches and browser web storage (including HTML 5) and other technology.

Certain Services include social networking, chat room or forum features. Ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if We intend to use your data for such purposes or if We intend to disclose your information to any third party for such 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 also exercise the right at any time by contacting us at The Data Protection Officer, Sodexo Motivation Solutions U.K. Limited at Avalon House, Breckland, Linford Wood, Milton Keynes MK14 6LD or at cardservices@p-mm.co.uk.

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which the **App** or the Services are advertised). If you follow a link to any of these websites, please note that these websites and any

services that may be accessible through them have their own **privacy policies** and that We do not accept any responsibility or liability for these **policies** or for any personal data that may be collected

through these websites or services, such as contact and location data. Please check these **policies** before you submit any personal data to these websites or use these services.

ACCESS TO INFORMATION

The Data Protection Act 1998 gives you the right to access information held about you. Your right of access can be exercised in accordance with that Act. Any access request will be subject to a fee of £10.00 to meet our costs in providing you with details of the information We hold about you.

A Subject Access Request should be made in writing to - The Data Protection Officer, Sodexo Motivation Solutions U.K. Limited at Avalon House, Breckland, Linford Wood, Milton Keynes MK14 6LD.

CHANGES TO PRIVACY POLICY

Any changes We may make to our **privacy policy** in the future will be posted on this page and, where appropriate, notified to you by e-mail or when you next start the **App** or log onto one of the Services Sites. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the **App** or the Services.

CONTACT

Questions, comments and requests regarding this **privacy policy** are welcomed and should be addressed to Avalon House, Breckland, Linford Wood, Milton Keynes MK14 6LD or cardservices@p-mm.co.uk