

Nordexo Privacy Statement

About this Privacy policy

We know how important it is for you to understand how we use your data. This Privacy policy sets out how and why we collect, store, process and share your personal data. We will always be transparent with you about what we do with your personal data.

This Policy also tells you what your rights are in relation to the personal data you give to us. If you have any questions about this Privacy policy or your rights under it please contact:

Address: Kr. Valdemara St 118, 6th Floor, 602d, Riga, LV-1013, Latvia

Phone: +371 25 663 270

Email: info@nordexo.com

We are Nordexo IT (Latvia, Reg. No. 40203206226) ('Nordexo') and our registered address is Kr. Valdemara St 106-83, Riga, LV-1013, Latvia. Nordexo is the 'data controller' of any personal data it may collect, process and hold about you, unless we inform you otherwise.

1. Which categories of personal data do we collect and how do we process such personal data?

We collect personal data of our employees, potential employees, clients, suppliers, business contacts, shareholders and website users. If the data we collect are not listed in this privacy statement, we will give individuals (when required by law) appropriate notice of which other data will be collected and how they will be used.

Except for certain information that is required by law or by Nordexo policies, your decision to provide any personal data to us is voluntary. You will therefore not be subject to adverse consequences if you do not wish to provide us with your personal data. However, please note that if you do not provide certain information, we may not be able to accomplish some or all of the purposes outlined in this privacy statement, and you may not be able to use certain tools and systems which require the use of such personal data.

If you provide us with personal data of another person (for instance, a potential employee/referral), you are responsible for ensuring that such person is made aware of the information contained in this privacy statement and that the person has given you his/her consent for sharing the information with Nordexo.

The above-mentioned categories of personal data have been obtained either directly from you (for example, when you provide information to sign up for a newsletter or register to comment on a forum website) or indirectly from certain third parties (for example, through our website's technology). Such third parties include our affiliates, public authorities, public websites and social media, suppliers and vendors.

If you are using a mobile device and browsing our website, we may collect your IP address or other device identifier, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, and other portable device information.

We may, where we have a lawful basis for doing so, also collect personal data about you from third parties who provide us with additional publicly available information about you.

We use this information on an anonymous basis and will never use it to identify any particular user. We won't be able to link this data to any other data that we hold about you and the purpose of collecting this data is to perform analysis and to help us identify people flows around our stores to maximize the efficiency of our store design.

We may collect and process the following personal data:

- Personal data that you provide by filling in forms on our website. This includes registering to use the website, subscribing to services, newsletters and alerts, registering for a conference or requesting a further information. Pages that collect this type of personal data may provide further information as to why your personal data are needed and how it will be used. It is completely up to you whether you want to provide it.
- If you contact us, we may keep a record of that correspondence.
- We may ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Any postings, comments or other content that you upload or post to a Nordexo website.
- Our website collects personal data about your computer, including (where available) your IP address, operating system and browser type, for system administration, to filter traffic, to look up user domains and to report on statistics.
- Details of your visits to our website, the pages you view and resources you access or download, including but not limited to, traffic data, location data, weblogs and other communication data.

2. Legal justification and reasons to use your personal data?

We use your personal data to provide you with the information, products and services that you request or purchase from us (i.e. to complete certain tasks, processes or orders on our website or within our apps, take payment online (where applicable) and deliver your products or services), and to communicate with you regarding those products and services that you purchase from us and respond to your questions and comments;

We may also use your personal data to measure how satisfied our customers are and provide customer service (including troubleshooting in connection with purchases or your requests for services or when you ask us questions on social media);

We rely on our contractual arrangements with you as the lawful basis on which we collect and process your personal data when you make an order for products and services. Alternatively, in some cases, we rely on our legitimate interests as a business (for example, to measure customer satisfaction and troubleshoot customer issues). Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.

For administrative and internal business purposes

We may use your personal data for our internal business purposes, such as enhancing our site, improving our services and products and identifying usage trends. We may also use your data to monitor the use of our website and ensure that our website is presented in the most effective and relevant manner for you and your device and setting default options for you (such as language and store location);

It is in our legitimate interests as a business to use your personal data in this way. For example, we want to ensure our website is customer friendly and works properly and that our products and services are efficient and of high quality. We also want to make it easy for you to interact with us. Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.

For security and legal reasons

We use your personal data to:

- ensure the personal and financial information you provide us is accurate;
- conduct fraud checks or prevent other illegal activity;
- protect our rights or property (or those of others); and
- fulfil our legal and compliance-related obligations.

In some cases, we will use your personal data because it's necessary for us to comply with a legal obligation (such as if we receive a legitimate request from a law enforcement agency). In other cases (such as the detection of fraud) we will rely on our legitimate interests as a business to use your personal data in this way. Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.

Purpose	Legal basis
Managing our contractual and/or employment relationship with you.	Necessary for the performance of a contract to which you are a party.
Recruitment.	Justified on the basis of our legitimate interests for ensuring that we recruit the appropriate employees.
Facilitating communication with you (including in case of emergencies, and to provide you with requested information).	Justified on the basis of our legitimate interests for ensuring proper communication and emergency handling within the organization.
Operating and managing our business operations.	Justified on the basis of our legitimate interests for ensuring the proper functioning of our business operations.

Complying with legal requirements.	Necessary for the compliance with a legal obligation to which we are subject.
Monitoring your use of our systems (including monitoring the use of our website and any apps and tools you use).	Justified on the basis of our legitimate interests of avoiding non-compliance and protecting our reputation.
Social listening (Identifying and assessing what is being said about Nordexo and our clients on social media (only publicly accessible content) to understand sentiment, intent, mood and market trends and our stakeholders' needs and thereby improving our services. We do this through key-word searches and our goal is to gain insights in conversation trends over a specified period and not to identify an individual. To achieve this, we analyze and monitor conversation streams and monitor publicly available opinions, statements or other interactions on social media channels.)	Justified on the basis of our legitimate interest of protecting our assets and our brand on social media
Improving the security and functioning of our website, networks and information.	Justified on the basis of our legitimate interests for ensuring that you receive an excellent user experience and our networks and information are secure.
Undertaking data analytics, i.e. applying analytics to business operations and data to describe, predict and improve business performance within Nordexo and/or to provide a better user experience.	Justified on the basis of our legitimate interests for ensuring the proper functioning of our business operations.
Marketing our products and services to you (unless you objected against such processing)	Justified on the basis of our legitimate interests for ensuring that we can conduct and increase our business.

Where the above table states that we rely on our legitimate interests for a given purpose, we are of the opinion that our legitimate interests are not overridden by your interests, rights or freedoms.

We will process your personal data for the purposes mentioned above based on your prior consent, to the extent such consent is mandatory under applicable laws.

We will not use your personal data for purposes that are incompatible with the purposes of which you have been informed, unless it is required or authorized by law, or it is in your own vital interest (e.g. in case of a medical emergency) to do so.

3. Who will have access to your personal data?

We will never sell any of your personal data to a third party. However, in order for us to provide our services to you, we share your personal data with our trusted third party service providers or our group companies, as detailed below. Whenever we share your personal data, we put safeguards in place which require these organisations to keep your data safe and to ensure that they do not use your personal data for their own marketing purposes.

To prevent crime and comply with laws

We share your financial information including your credit, debit card or other payment information with third parties to ensure that your payment is safe and that your details are not being used fraudulently. This data sharing enables us to conduct fraud analysis which ensures that genuine and accurate payment details are provided to us for any purchase. We may share your personal data with credit agencies if you are requesting credit.

There may be other scenarios where we are subject to a legal obligation to share or disclose your personal data, such as with law enforcement agencies or public authorities in order to prevent or detect crime or fulfil a legal requirement.

Other professional services

We may need to disclose your personal data to our insurers where we believe that it is required under our contractual relationship with our insurance provider to do so.

We work with carefully selected third parties, such as our customer database hosting provider, marketing agencies and advertising partners who assist us in providing you with a positive customer experience. We work with these third parties to place relevant content and advertisements for you on our website, other websites and online media channels and apps.

4. Does Nordexo collect sensitive data?

We do not generally seek to collect sensitive data (also known as special categories) through this site or otherwise. In the limited cases where we do seek to collect such data, we will do this in accordance with data privacy law requirements and/or ask for your consent.

The term 'sensitive data' refers to the various categories of personal data identified by data privacy laws as requiring special treatment, including in some circumstances the need to obtain explicit consent from you. These categories include racial or ethnic origin, political opinions, religious, philosophical or other similar beliefs, membership of a trade union, physical or mental health, biometric or genetic data, sexual life or orientation, or criminal convictions and offences (including information about suspected criminal activities).

5. Security and retention of your personal data.

Security of your personal data

We take the security of your personal data very seriously. We have implemented various strategies, controls, policies and measures to keep your data secure and keep these measures under close review. We protect your data by using encryption techniques and we use other safeguards such as firewalls and password protection. This means that your data is protected and only accessible by co-workers who need it to carry out their job

responsibilities. We also ensure that there are strict physical controls in our buildings which restricts access to your personal data to keep it safe.

Retention of your personal data

In broad terms, we will only retain your personal data for as long as is necessary for the purposes described in this Privacy policy. This means that the retention periods will vary according to the type of the data and the reason that we have the data in the first place.

We have procedures in place regarding our retention periods which we keep under review taking into account our reasons for processing your personal data and the legal basis for doing so.

We maintain organizational, physical and technical security arrangements for all the personal data we hold. We have protocols, controls and relevant policies, procedures and guidance to maintain these arrangements taking into account the risks associated with the categories of personal data and the processing we undertake.

6. How long will your personal data be retained by us?

We will retain your personal data only for as long as is necessary. We maintain specific records management and retention policies and procedures, so that personal data are deleted after a reasonable time according to the following retention criteria:

- We retain your data as long as we have an ongoing relationship with you.
- We retain your data for as long as needed in order to comply with our global legal and contractual obligations.

7. Your personal data – your rights.

You have a number of rights relating to your personal information and what happens to it. You are entitled to:

- have your data processed in a fair, lawful and transparent way;
- be informed about how your personal data is being used, an example being this privacy policy;
- access personal data we hold about you;
- require us to correct any mistakes in your personal data;
- require us to delete personal data concerning you in certain situations where there is no good reason for us to continue to process it;
- request that we transfer your personal data to you or another service provider in a simple, structured format;
- object at any time to processing of your personal data for direct marketing purposes;
- object to automated decision making which produces legal effects concerning you or similarly significantly affects you;
- object in certain other situations to our continued processing of your personal data; and

- otherwise restrict or temporarily stop our processing of your personal data in certain circumstances.

Thank you,
Nordexo Team

Revised and posted as of October 10, 2019