

# Privacy Policy

Edenred Benefits, LLC

Updated: December 2025. *To ensure readability for all users, if you require this notice in an alternative format, please contact us.*

This Privacy Policy (this "**Policy**") explains how Edenred Benefits, LLC ("**Edenred**", "**we**", "**us**", or "**our**") collects, processes, and discloses information that we collect through our websites, including [www.edenredbenefits.com](http://www.edenredbenefits.com) (the "**Sites**"), our mobile applications ("**Mobile Application**"), and the services we provide to our clients and their employees. As used herein, the terms "**you**", "**your**" and "**user**" refer to all persons and entities accessing the Site, our Mobile Applications, and our Services.

The Site and Mobile Application, and our related services, provide employee benefits program solutions to our clients and their related administrators and benefits providers ("**Clients**"), and their employees as well as certain other third parties described herein, to offer a employee benefits program (collectively, the "**Services**").

We collect and use information for own purposes through the operation of our business and when we provide our Services directly to individuals, and, in some cases, on behalf of our Clients as required to provide our products and services. Depending on our relationship with each individual Client, we process personal information in connection with the Services as either a processor or as a controller. This Policy explains our practices with regard to the information that we collect in both contexts.

By using our Sites, Mobile Application, or Services, you agree to be bound by this Policy. If you do not agree to the terms of this Policy, please do not use or access our Sites, Mobile Application, or Services. Each time you use the Sites, Mobile Application, or Services, the current version of this Policy will apply. This Policy is incorporated into, and is part of, our Terms of Use available at our [TERMS OF USE AGREEMENT](#), which governs your access to and your use of our Sites, Mobile Application, or Services. This Privacy Policy does not modify any other written agreement that you (or a Client with which you are affiliated) may have in place with us.

## INFORMATION WE COLLECT AND HOW WE USE IT

We collect two types of information from users of our Sites, Mobile Application, or Services: "personal information," which is information that you provide that can be used to identify you (such as your name or your email address), and "aggregate information," which is information that cannot be used to identify you (such as frequency of visits to the Sites and your browser type).

### How we Use Your Information

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In general, we collect information and so that we can provide our Sites, Mobile Application, and Services, operate our business, and provide information that you request from us. This includes but is not limited to the following, unless otherwise stated in a specific section below:

- Provide, operate, improve, maintain, and protect our Sites, Mobile Application, and Services.
- Process purchases and payments.
- Provide you with technical and other support, and troubleshoot issues you may have.
- Send you updates, marketing communications, and other information about Edenred and our Sites, Mobile Application, and Services.
- Send you notices and alerts.
- Conduct research, analytics, and monitor and analyze trends and usage.
- Contact you and respond to your inquiries.
- Enhance or improve user experience, our Sites, Mobile Application, and Services, and our business, including the safety and security thereof.
- Personalize our Sites to you.
- As necessary to comply with any applicable law, regulation, subpoena, legal process, or governmental request.
- Enforce contracts, including investigation of potential violations thereof.
- Detect, prevent, or otherwise address fraud, security or technical issues.
- Protect against harm to the rights, property or safety of Edenred, our Sites, Mobile Application, and Services, our users, or the public as required or permitted by law.

### **Account Information**

We collect information about our Clients that they provide to us, including information about their employees, in order for us to provide our Services. This information may include certain personal information such as first and last name, home or office address, email address, and phone number (collectively, "**Account Information**"), and is typically necessary to enroll such employees in our Services. We collect and store Account Information in accordance with this Privacy Policy, including to provide the Services, for billing purposes, identity verification, communication, and to periodically notify you of news and activities with respect to the Services.

We use Account Information to provide the Services and for our own legitimate business purposes. This also includes responding to inquiries or service requests, providing information about our products and the Services, product development, providing technical support, enforcing our agreements and potential violations thereof, investigating fraud, security, compliance with legal obligations and communicating with you or your employer, where applicable. We may also use Account Information for marketing, including for the promotion of different Edenred services or products, targeted marketing (personalized campaigns), analytics, communications to support and improve client services and their onboarding and communications to improve our Services (for example, sending surveys).

### **Information Provided by You**

We collect and store information that you voluntarily provide to us in connection with your use of our Services. In order to establish user profiles and use certain products/services, we may ask users to provide us with additional information, including age, date of birth, telephone or mobile phone number, email address, home address, credit card information, bank account information, digital wallet information and truncated Social Security numbers (your "**User Profile Information**"). Users can use the Services to modify or confirm their user profiles, and to order or manage products and services offered. Please do not provide Social Security numbers to us.

### **Information Automatically Collected**

We automatically collect certain information related to your use of our Sites and Mobile Application, such as your IP address, the time, frequency and duration of your visits to our Sites, your browser type, and information about your device. We may also collect other data regarding your use of the Services, such as click-stream data, your IP address, access times and the referring website addresses (for additional information, see the section titled "Cookies" below). In addition, through your use of our Mobile Application, we may collect geolocation data.

Your Account Information and User Profile Information are collectively referred to as your "**Information.**"

### **Employment**

If we have collected your Information through our "Careers" page in response to a job opening, you are giving us permission to use and retain your Information for the purpose of evaluating your application for employment consideration for the specific position that you applied to, as well as other roles at Edenred. This Personal Information may be processed and stored by a third party talent tracking solution provider as well as with vendors, consultants, and other service providers who need access to such information to carry out work relating to the recruitment process on our behalf.

### **Affiliated Third Party Products and Services**

You may use our Services to order or use products and services that are offered and provided by an affiliated third party. In some cases, we do not have a direct relationship with such third parties. If you choose to use or order third party products and services through our Services, you are authorizing us to share your Information with such third parties for this purpose. Depending on the product or service and the specific third party, the third party may provide information back to us about your use of the product, such as transaction dates and times, locations of transactions and/or balances. We make no representations about and do not have any liability for the privacy practices or policies of any third parties, including third parties described in this section, and are not responsible for their collection, use or disclosure of your Information. If you are submitting Information to any such third party through our Services, you should review and understand that party's applicable policies, including their privacy policies, before providing your Information to the third party.

We retain information for the period necessary to fulfill the purposes outlined in this notice, comply with legal obligations, and enforce our policies.

## **HOW WE SHARE YOUR INFORMATION**

### **Recipients of your personal information**

We may disclose your personal information to Edenred affiliate companies, to third parties whom we have contracted to provide aspects of the Services, or who otherwise perform functions on our behalf to provide the Services, such as our Internet hosting provider and other organizations that provide services to us.

As part of the Services, some users may qualify to participate in reward programs by submitting Account Information for certain retailer loyalty programs and business partners. If you choose to participate in such programs, your Account Information will be used for purposes of calculating rewards and mailing or e-mailing coupons or pre-paid rewards cards to you.

We will not sell, share or rent your personal information to third parties other than as described in this Policy, however, we may freely use and disclose de-identified and aggregated information that does not identify you (not linked to any of your personally identifiable individual). We may also de-identify or aggregate personal information so that you are not identified as an individual, then use and provide that information to third parties without restriction. We may also use your personal information to send you information about products and services offered by us, or related information about third parties, unless you have asked us not to do so.

### **Other Permitted Disclosure of Information**

We reserve the right to disclose personal information: (i) to comply with any applicable law, regulation, subpoena, legal process, court order, or governmental request; (ii) to enforce our agreements, including investigation of potential violations thereof; (iii) to detect, prevent, or otherwise address fraud, security or technical issues; (iv) to protect against harm to the rights, property or safety of Edenred, our users, Clients or the public as required or permitted by law; and (v) as otherwise required or permitted by law, including any contractual obligations of Edenred.

We may disclose personal information to your agent or legal representative (such as the holder of a power of attorney that you grant, or a guardian appointed for you). In addition, if you opt for direct deposits of claim reimbursements or applicable refunds, in your bank account or digital wallet information we will share certain personal information with financial institution or digital wallet service providers in order to facilitate such deposits.

If you use our Services in connection with your employment with one of our Clients, we may disclose your personal information to our Client (your employer and their related benefit administrators and providers) in connection with our Services, and as otherwise directed by you or with your consent.

We may disclose and transfer your personal information in connection with the sale, purchase, merger, asset sale, financing, reorganization, liquidation or dissolution of Edenred, including the evaluation thereof.

### **Protection of your Information**

We are committed to protecting the security of the personal information you provide to us via the Services. We have implemented reasonable technical and organizational measures designed to deter unauthorized access, destruction, use, modification, or disclosure of your personal information. Regardless of these precautions, no data transmitted over the Internet or any other public network can be guaranteed to be 100% secure. We cannot ensure or warrant the security of any Information you transmit to us and you provide all such Information to us at your own risk.

You are responsible for maintaining the security of your User Profile Information, including your login credentials, and for any and all activities that occur under your account. Do not share your login information with anyone. We will never ask you to send your password or other sensitive information to us by email, though we may ask you to enter this type of information into the Services. If you believe someone has obtained unauthorized access to your account, please change your password immediately and notify us at: [customerservice@edenredbenefits.com](mailto:customerservice@edenredbenefits.com)

## **YOUR PRIVACY RIGHTS AND CHOICES**

### **Exercise of your privacy rights**

In accordance with the applicable regulation, you may be entitled to access to, rectify but also erase your data (unless your personal data is necessary to comply with a legal obligation). Under certain circumstances and the conditions set forth in the applicable law, you also have a right to object to and to obtain restriction of certain data processing activities, and to withdraw your consent where the processing of your personal data is based on your consent (see opt-out options below).

You can exercise your rights, enclosing proof of identity where required, by filling in the relevant [form/Privacy Portal accessible here](#).

### **Modifications and Changes to Account Information and User Profile Information and Removing Your Information**

If you have an account with us, you may access, correct, update or remove certain Information that we have about you by logging into your user account. In addition, your employer, as applicable, may update your Account Information from time to time. If you are unable to edit your Information by logging into your user account, please contact us for assistance. Please note that in some situations we are not able to remove or change certain Information.

You may also request that we delete your Information by contacting us at [deletePI@edenredbenefits.com](mailto:deletePI@edenredbenefits.com). However, in some cases we cannot delete all or some of your Information if prohibited, required or permitted by applicable laws, or as necessary to provide Services to you.

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As noted above, In certain cases, where we process personal information on behalf of Client, we cannot act on your request directly and will forward your request to the applicable Client

### **Choice and Opt-Out; Surveys and Other Information Gathering Activities**

You may "opt-out" from receiving marketing communications from us or our affiliated third parties. If you opt-in to receiving marketing communications from affiliated third parties, you authorize us to share your information with such third parties.

Please understand that if you choose not to receive marketing communication from us, we may still contact you in connection with your relationship, activities, transactions, and communications with us in connection with our Services.

From time to time, we may provide you the opportunity to participate in surveys and other information gathering activities to obtain information and feedback regarding our Services and potential new products or services. Participation in these surveys and activities is completely voluntary and in some cases you may be provided a choice to participate anonymously. Information obtained from such surveys and activities may be used by us to consider enhancements or improvements to the Services, for future product development or for other purposes pertaining to the Services or our business, without compensation to you.

### **Links to Other Websites**

The Services may contain links to other third-party websites over which we have no control. We are not responsible for the privacy policies or practices of other websites. You should review their privacy policies to understand how they collect, use, share, and protect any information that you choose to provide to them. This Policy applies solely to the information collected through our Services and does not apply to any information collected by linked websites or the use of any your information by any third party through such linked websites.

### **Cookies and Analytics**

"Cookies" are simple text files stored on your computer for use by a browser. Certain Site features may only be available through the placement of a cookie. Like most websites, our Site and Services use "cookies" to assist in data collection and to track visitor usage and trends to help us better serve you. Most Internet browsers permit a user to accept, decline or delete cookies. This Site works with a first party cookie that collects anonymous traffic data at the Site. We use persistent cookies to store information about how you came to the Site, determine what part(s) of the Services you use, and to make it easier for you to navigate the Site and Services. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided by your Internet browser. We may contract with third-party service providers that also use cookies to help us understand usage of our Site and Services. These service providers are not permitted to use the information collected on our behalf for their own purposes. You can learn more about cookies and how they work at [www.allaboutcookies.org](http://www.allaboutcookies.org). You can always disable cookies through your browser settings. Doing so, however, may disable certain features on our Site. You can opt-out from

third party cookies that are used for advertising purposes on the NAI website at [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp).

We use analytics partners to collect certain non-personally identifiable information about how our Site is used. Currently, we use Google Analytics as our analytics partner. Google Analytics uses cookies to help us understand how visitors use our Site and to compile reports on website activity. To learn more about how Google Analytics handles your non-personally identifiable information and how they interact with our Site, please visit <http://www.google.com/analytics/terms/us.html>, as we have no ability to control or monitor Google Analytics' data collection or data use practices with respect to such information. For information on how to opt-out of Google Analytics, please visit <https://tools.google.com/dlpage/gaoptout/>.

At this time, our Site does not respond to browser "do not track" signals.

### **Children Under 16**

Our Sites, Mobile Application, and our Services are not intended for use by children under 16 years of age, and we do not knowingly collect personal information from children under 16. If you are under age 16, please do not disclose or provide any personal information to us. Upon notification that a child under 16 has provided us with personal information, we will delete the child's personal information from our systems.

### **Changes to Privacy Policy**

Each time you use the Sites, Mobile Application, or our Services, the current version of this Privacy Policy will apply. When you use the Sites, Mobile Application or our Services, you should check the date of this Privacy Policy (which appears at the top of this Privacy Policy) and review any changes since the last version. Unless stated otherwise, our current Privacy Policy applies to all Information that we have about you. Continuation of your use of the Sites, Mobile Application, or our Services shall be considered acceptance of any changes to the Privacy Policy. We will not materially change our policies and practices to make them less protective of your privacy without the consent of and/or information to affected users where required by applicable law.

### **Notice to California Residents**

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by the Company to third parties for the third parties' direct marketing purposes. With respect to these entities, this Privacy Policy applies only to their activities within the State of California. To make such a request, please send an email to [customerservice@edenredbenefits.com](mailto:customerservice@edenredbenefits.com) or write to us at the address listed below.

### **Notice to Nevada Residents**

Nevada customers can opt out of the sale of their personal information. We do not currently sell personal information. However, Nevada customers have the legal right to opt out of the sale of their personal information, even if their information is not currently being sold. You may

opt out by emailing a request to customerservice@edenredbenefits.com. In your request, please specify that you wish to “Opt-out of Sale of Personal Information in Nevada.” Please allow 60 days for a response.

**Notice To Visitors Outside Of The United States.**

We are based in the United States, and our Services are hosted there. If you are visiting our Site or using our Mobile Application or Services from another country, the laws governing our collection and use personal information may be different from the laws of your country. If you decide to visit our Site, or use our Mobile Application or Services, or share your personal information with us, you are agreeing to be governed by the laws of the United States, and agree to have your data directly processed in the United States.

**Contact Us**

If you have any questions or comments regarding our Policy or our privacy practices in general, please contact us:

Email: [privacy@edenredbenefits.com](mailto:privacy@edenredbenefits.com)

Postal Address: Edenred Benefits, LLC. 303 Winter Street, Ste 295, Waltham, MA 02451

**Or directly to our data privacy team via our [Privacy Portal, accessible here](#)**

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