

## For California Residents

Last Updated: April 2020

If you are a resident of California, this notice applies to you and supplements our Privacy Policy [located here](#). It is intended to provide certain information to you as required by the California Consumer Privacy Act of 2018 (“CCPA”), as amended.

We collect certain Personal Information for our own purposes through the operation of our business, and also collect certain Personal Information provided to us as a service provider to our Clients and their employees as needed to provide our product and services. This notice explains our practices with regard to the Personal Information that we collect in both contexts.

This notice applies to information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household such as your real name, alias, postal address, unique personal identifier, online identifier Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers (“Personal Information”).

Personal Information does not include:

- Publicly available information we obtain from government records
- De-identified or aggregated consumer information

Please note that some of the requirements of CCPA do not go into effect, and some provisions of the CCPA will not apply, until January 1, 2021 for Personal Information related to employee benefit plans.

### Information We Collect

We have collected the following categories of Personal Information from consumers within the last twelve (12) months:

| Category                                      | Examples   |
|---|--|
| Identifiers                                   | A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, last 4 digit of your Social Security number in certain instances, driver's license number, passport number, or other similar identifiers. |
| Personal Information categories listed in the | A name, signature, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number,  |

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|--|---|
| California Customer Records statute (Cal. Civ. Code § 1798.80(e)). | credit card number, debit card number, or any other financial information. Some Personal Information included in this category may overlap with other categories. |
| Commercial information   | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.                  |
| Internet or other similar network activity                         | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.  |
| Geolocation data   | State and country location.   |
| Sensory data   | Audio, electronic, visual, or similar information.  |
| Professional or employment-related information                     | Current or past job history or performance evaluations.   |
| Inferences drawn from the above                                    | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.   |

**Categories of Sources**

We collect Personal Information provided voluntarily by you or your employer when you or your employer uses our products and services, through our surveys, transactions, and other interactions with you. We also passively collect personal information through your interaction with our website and mobile application. Additionally, we may also receive Personal Information from our Clients, business partners, affiliated third parties, and vendors, where applicable.

**Business Purposes for Collection of Personal Information**

Collecting and using Personal Information is necessary to our business as a provider of commuter benefit services in order to develop, enhance, and administer our products and services, respond to your requests, inquiries and concerns, facilitate invoicing, facilitate reimbursements, inform and educate you about our company and events, and for advertising and marketing purposes. It also helps us to confirm your identity for certain transactions or products you request or that are initiated on your behalf, improve our website and mobile application user experience, authenticate users, prevent and detect fraud and potential security issues, and fulfill our legal and regulatory obligations such as tax reporting and complying with anti-money laundering laws.

## **Disclosures of Personal Information**

Your Personal Information may be disclosed to:

- You, your authorized representatives, legal agents, and other persons acting on your behalf or to whom you ask, direct, or authorize us to disclose your Personal Information,
- Our Clients (our Client is your employer if you use our products and service in connection with your employment benefits),
- Plan and benefit sponsor providers and sponsor banks, other banks, benefit administrators, financial institutions, digital wallet service providers, and card processors,
- Transit agencies, parking operators and/or commuter related service merchants,
- Reward and loyalty program providers,
- Our contracted service providers who provide a service to or on behalf of Edenred, such as analytics service providers, payment providers and website partners,
- Our auditors, consultants, accountants, attorneys and others providing professional advice to Edenred,,
- Parents and business partners of Edenred,
- Applicable governmental, regulatory, supervisory, law enforcement, tax or similar authorities or industry bodies,
- Any other person or entity Edenred reasonably thinks customary, necessary or advisable for the business purposes disclosed in our Privacy Policy or to whom Edenred is obliged by applicable law or regulation to make the disclosure,
- Any other party where Edenred has obtained your consent or authorization, such as affiliated third parties when directed by you.

## **Business Purposes for Disclosure of Personal Information (as applicable)**

- To advertise and market to you, and to consumers who are similar to you,
- To perform services on our behalf, including providing customer service, processing or fulfilling orders, account maintenance, processing payments, reimbursements, benefit fulfillment, and quality control,
- For risk management purposes, identity verification, information security, fraud detection and prevention,
- Undertaking internal research, operational efficiencies and improvements, product enhancements, and business development purposes,
- In connection with legal proceedings, such as responding to a subpoena or court order,
- To demonstrate compliance with our regulatory obligations,
- To report tax information to relevant tax authorities,

- In the event of any planned or actual company reorganization, merger, sale, or transfer, of our business.

## **Your CCPA Rights**

### **Right to Know**

You have the right to request that we disclose certain information to you about our collection of your Personal Information. Such information shall cover the 12-month period preceding our receipt of your request. Upon our receipt of your verified request, we will provide you with the following:

- The categories of Personal Information we have collected about you,
- The categories of sources from which we have collected your Personal Information,
- Our business or commercial purpose(s) for collecting or sharing your Personal Information,
- The categories of third parties with whom we have shared your Personal Information, and
- The specific pieces of Personal Information we have collected about you.

Please note that even if your request is validated, we will not at any time disclose sensitive information such as a consumer's Social Security Number, driver's license number or other government-issued identification number, financial account number, health insurance or medical identification number, account password, or answers to security questions.

You have the right to request that we disclose certain information to you about our disclosures of your Personal Information to third parties. Such information shall cover the 12-month period preceding our receipt of your request. Upon our receipt of your verified request, we will provide you with the following:

- The categories of Personal Information we have collected from you,
- The categories of Personal Information that we disclosed about you for a business purpose.

### **Right to Opt-Out of Sale**

We do not sell your personal information now and have no plans to start, however, we are required to let you know that you have the right to opt-out of the sale of your personal information if we ever engage in such activity.

### **Right to Delete**

You have the right to request that we delete certain Personal Information we collected from you. We will use commercially reasonable efforts to honor your request. However, in many

cases we cannot delete all or some of it, such as when we need to retain it as necessary to provide our products and services or complete transactions for which the Personal Information was collected, due to our regulatory obligations to retain certain information, or as required or permitted by other applicable laws, such as for fraud prevention and similar purposes.

### **Right to Non-Discrimination**

We will not discriminate against you for exercising your rights under the CCPA, such as denying you products and services, charging you different rates or prices including use of discounts or penalties, or suggesting or providing a different level of service or quality of products to you.

### **How to Exercise Your CCPA Rights**

Users who have an online account with us are able to login to their account to delete or change some of their Personal Information. For all other requests, to submit a request to exercise any of your rights provided in this notice, please use our contact us at [customerservice@commuterbenefits.com](mailto:customerservice@commuterbenefits.com), or submit your request by phone by calling us at 857-228-1400 .

If you are an employee of an Edenred Client and use our services in connection with your employment benefits, please contact your employer for more information regarding how to exercise your CCPA rights, as we cannot act directly on such requests.

Please include in the subject line California Privacy Rights Request. Also include the following information:

Name, address, city and state, details on the specific right you wish to exercise (e.g., Right to Know).

Upon receipt of your request we will provide directions on identity verification requirements, where appropriate. Your request will not be processed until your identity has been verified. Once your identity has been confirmed, your request will be processed in accordance with the CCPA. We must be able to verify your identity before we take action on your request.

You may designate an authorized individual to make a request on your behalf. To do so, you must provide a valid Power of Attorney, and a valid copy of the authorized individual's government-issued identification.

We endeavor to respond to verifiable consumer requests within 45 days. If we require more time (up to 90 days), we will inform you of the reason and extension period.

### **Changes to this CCPA Notice**

We may change or update this CCPA Notice from time to time. When we do, we will post the revised CCPA Notice on this page with a new “Last Updated” date.