

COOKIE POLICY

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This Cookie Policy applies to the global organization of Sodexo entities (hereinafter referred to as “Sodexo” or “we”) for all dimensions and activities, in all geographies where we operate.

Sodexo is the data controller who collects and processes the personal information you provide to circles.com or other affiliate sites (“Our Site”).

Our Cookie Policy aims to show you how we respect the privacy of all visitors to Our Site.

If you have any questions regarding the processing of your personal information on Our Site, please contact us by sending an email to the following email address: circles.privacy@sodexo.com.

We use cookies and other similar technologies to improve Our Site’s performance and to enhance your browsing experience. Certain areas of Our Site also use cookies to understand more about you, so we can offer adapted information on our services.

1. WHAT IS A COOKIE?

Cookies are **small files, downloaded on your device** when you access Our Site, with the aim **to recognize your device or to store information about your preferences or past actions**. They are used to help you navigate websites efficiently and perform certain functions.

In this policy, the term "cookies" refers to cookies and other similar technologies (e.g. web beacons).

2. WHAT COOKIES DO WE USE?

The types of cookies that we use may be:

- ▶ **Session cookies:** such cookies allow Our Site to link your actions during a browser session and are automatically deleted when you close the browser;
- ▶ **Persistent cookies:** such cookies remain stored in your terminal device until it reaches a defined expiration date which can be days or minutes. They may be used for a variety of purposes including remembering your preferences and choices when using a site or to target advertising;
- ▶ **First party cookies:** are set by a website that you are being visited at the time, in the purpose to improve your experience;
- ▶ **Third party cookies:** are set by a website that belong to a domain that is distinct from the domain of Our Site visited as displayed in the browser address bar.

More specifically, the cookies and other similar technologies used on Our Site are categorized as follows:

- ▶ Essential cookies used for technical purposes
- ▶ Audience measurement cookies
- ▶ Targeting cookies

A. ESSENTIAL COOKIES

Essential cookies include **strictly necessary cookies**, that we use for the functioning of Our Site and **functional cookies**, that help us with the performance and design of Our Site.

Strictly necessary cookies are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms (e.g., to register to events or to provide feedbacks).

Functional cookies help us to remember the settings which you have selected or assist with other functionality when you browse and use Our Site. This helps us to remember your preferences when you return to Our Site.

These cookies enhance functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages.

You can set your browser to block or alert you about these cookies but be aware that some or all of these functionalities may not function properly and that some parts of Our Site may not work.

B. AUDIENCE MEASUREMENT COOKIES

Audience measurement cookies, which include analytics technologies, help us with the performance and design of Our Site. This function allows us to measure how many times a page has been visited, to know which pages are the most and least popular and see how visitors move around the site to improve your experience on Our Site. The information collected by these cookies could be aggregated. If you do not accept (or withdraw your consent) these cookies, we will have no knowledge to improve Our Site.

Our Site may also use from time to time “web beacons” which count visitors who have come to Our Site after being exposed to a Sodexo banner ad on a third-party site. We do not use this technology to access your personal information and it is only used to compile aggregated statistics about visitors who come to Our Site to gauge the effectiveness of our ads.

Your consent is necessary to the use of most of the above-mentioned cookies. For more information on how to control cookies (consent/withdraw your consent) on Our Site, please see below section 4.

C. TARGETING COOKIES

Targeting cookies are installed on Our Site by our advertising partners to present advertisements that are relevant to you and better reflect your interests. These cookies uniquely identify your browser and device. If you do not allow these cookies, you will not experience our targeted advertising across different websites.

These cookies collect information relating to the origin of your visit, where you were exposed to Sodexo advertising, what advertising feature you saw, whether you arrived directly or indirectly to Our Site, the device you used to visit Our Site and which downloads you performed.

In addition, we also utilize cookies on certain pages of Our Site to communicate with third party data suppliers to extrapolate your digital behaviour. This help us to understand and target more relevant advertising in the future. The information we receive could be aggregated and will include statistics such as demographics, online behaviour, product interests and lifestyle.

Your consent is necessary to the use of most of the above-mentioned cookies. For more information on how to control cookies (consent/withdraw your consent) on Our Site, please see below section 4.

3. HOW LONG ARE COOKIES STORED?

Persistent cookies will be stored on your device for a maximum duration of 13 months.

4. HOW TO MANAGE COOKIES ON OUR SITE?

Essential cookies do not require your consent.

For analytics cookies and targeting cookies, we request your consent before placing them on your device. You can give your consent or refuse cookies at any time by:

- ▶ Using the Cookie Management Tool accessible via the link at the bottom of the page of Our Site.
- ▶ Setting up your browser to accept or refuse of cookies.

However, please be aware that if you do turn off 'cookies' in your browser, you will not be able to fully experience some of Our Site. For example, you will not be able to benefit from automatic log-on and other personalization features of Our Site.

Please also note that you should not forget to set up all the browsers of your different terminals (tablets, smartphones, computers). There are various ways to configure browsers so you should refer to the "Help" section of the browser you are using to understand how to configure it and exercise your options.

You also have the possibility to disable the following audience measurement cookies:

- ▶ You can disable "Google Analytics" cookies, by downloading the module accessible from the following address: <https://tools.google.com/dlpage/gaoptout/>
- ▶ You can disable the Insight Tag of LinkedIn, by modifying your user settings on LinkedIn: <https://www.linkedin.com/psettings/>

5. CHANGES TO THIS COOKIES POLICY

Sodexo may change this Cookie Policy statement as needed. Please note that this policy is likely to change with the future entry into force of the ePrivacy Regulation. If changes to the policy are made, please note that it may take up to 30 business days before new privacy practices are implemented. Check this page periodically if you would like to monitor changes.

6. COMPLAINTS

If you have a privacy-related complaint against us, you can email your complaint to the contact address below. If you are dissatisfied with our response, you may then seek further recourse by contacting the competent Supervisory Authority or the relevant competent court. You may also contact our lead Supervisory Authority, the French Supervisory Authority (the "CNIL", www.cnil.fr).

7. CONTACT US

If you have questions or you do not feel that your concerns have been addressed in this Cookie Policy, please contact us by sending an email to the following email address: circles.privacy@sodexo.com or contact our Group Data Protection Officer, by sending an email at the following email address: dpo.group@sodexo.com.