



Imprint Sodexo Austria

Sodexo Service Solutions Austria GmbH
Tricore Office Park | Modecenterstraße 22 | Office 2+3
1030 Wien
Tel.: +43 1 3286057-0
Email: info.at@sodexo.com

Locations:

5071 Himmelreich (Salzburg)
Josef-Lindner-Straße 2a Object 2/6, Tel.: +43 662 855855

8055 Graz
Neuseiersberger Straße 157, Tel: +43 3 16424684

6020 Innsbruck
Grabenweg 3, Tel: +43 5 12272001
9020 Klagenfurt
Alpen-Adria-Platz 1, Tel: +43 4 63310012

4030 Linz
Fuchsendgutstrasse 7, Tel: +43 7 32315051

6890 Lustenau
Dornbirner Straße 34, Tel: +43 5 5778166

VAT number: ATU 31199609
Commercial register number: 41721f
Company headquarters: 6890 Lustenau
Commercial register court: Regional Court of Feldkirch
Managing directors: Michael Freitag, Jürgen Giesinger
Shareholdings: Sodexo GmbH 30.77%, Sodexo Dienstleistungen GmbH 69.23%
Business purpose: Care and Business Services
Basic orientation: Information about Quality of Life Services
Membership of: Chambers of Commerce of the Austrian federal states
Applicable legal regulations: Trade Regulation Act for Austria
Supervisory authority: District Authority Dornbirn
Information obligation according to ECG and Media Act: Sodexo

Privacy Policy Sodexo Austria

Purpose of this policy

The following information is provided to inform you of the obligations of Sodexo Services Solutions Austria GmbH (hereinafter referred to as "Sodexo") regarding the processing of personal data. Sodexo builds strong, long-lasting relationships with its customers, partners, and consumers based on mutual trust. Ensuring their personal data remains secure and confidential is a priority for us. Sodexo is committed to complying with all applicable legal and regulatory requirements regarding the protection of personal data.

To ensure the protection of the personal data of those who use our websites and other applications, we have implemented the following measures:

- Users retain control over their personal data. Data is processed transparently, confidentially, and securely.
- Sodexo is committed to protecting the personal data of its users in accordance with the German Federal Data Protection Act (BDSG) in its current version and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter "GDPR").
- Sodexo has a global team dedicated to personal data protection. It consists of a Corporate Data Protection Officer registered with the CNIL, France's national data protection authority, and a network of contacts and data protection officers at the local level.

Please read this privacy policy carefully to familiarize yourself with the categories of personal data collected and processed, the purposes for which we use it, and with whom we are likely to share it. This privacy policy also describes your rights and how you can contact us to exercise those rights or ask us questions about the protection of your personal data. This policy may be amended, supplemented, or updated, in particular to reflect legal, regulatory, or technological developments. However, your personal data will always be processed in accordance with the provisions in force at the time the data was collected, unless a mandatory legal requirement is enforced retroactively.

Identity and contact information of the controller

Responsible for data processing is:

Sodexo Service Solutions Austria GmbH
Dornbirner Straße 34
6890 Lustenau – Austria
Phone: +43 (0) 5577 8166 - 0
Email address of your contact person for data protection: info.at@sodexo.com

The definition

"Controller" - The Sodexo entity which, alone or jointly with other Sodexo entities or third parties, determines the purposes and means of the processing of Personal Data.

"Personal data" – any information relating to a natural person who can be identified, directly or indirectly, by reference to an identification number or to one or more specific factors.

"Processing" – Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means. For example: collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

"Processor" – a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

"we", "us" or "our" - Sodexo

"You" or "User" - Any user/visitor of the Website or recipient of our Services.

How is your personal data collected? Is providing personal data mandatory?

We may collect your personal information in the following ways:

- Collecting your personal information directly from you, for example, when you fill out a form on our website or in one of our applications or when we provide services to you.
- Collection of your personal data indirectly during your navigation on the Website or Application (through our service providers and/or technologies).

We will only collect your personal information when strictly required by applicable local law or when necessary to provide our services.

If we are unable to collect this personal information, we will not be able to manage your access to our website or services or provide our services.

Processing activity	Purpose	Data categories	Legal basis
Analysis and optimization of our websites and applications, the prevention of fraud or money laundering and the examination, enforcement and defense of legal claims	Ensuring the security of our systems	Identity data (name, surname, picture - if you have provided it)	Legitimate interest in implementing the necessary technical measures to ensure the security of the operation of our websites and services
		Technical data (time and date of connection, metadata)	
Communication with users, contact via contact form, telephone, chat or email	Processing of inquiries	E-Mail-Address	Consent
		All personal data provided by users in their application	Legitimate interest in communicating with our users, customers and interested parties
Provision of services and creation and management of customer and user accounts	Processing customer and contract data for the purpose of establishing, structuring, modifying, and general order processing.	Identity, contact and billing data	Implementation of contractual or pre-contractual measures
	We only process and use data collected when you use our website to the extent necessary to enable or bill for the use of the service.	Transaction data such as payment information and credit/debit card information required to process your orders and which is transmitted directly to third parties. Usage data when using our website	
Customer relationship management	Maintaining our customer relationships in the Customer Relationship Management (CRM) database	Contact details (last name, first name, telephone number, email address, etc.)	Implementation of contractual or pre-contractual measures
		Publicly available information Contact details (last name, first name, telephone number, email address, etc.), publicly available information, replies to targeted	Legitimate interest in maintaining our customer relationships

			emails and other information collected and recorded by our employees as part of their interactions with our customers and partners to maintain our customer relationships in the Customer Relationship Management (CRM) database.	
				Implementation of contractual or pre-contractual measures
Management of supplier relationships	Procurement management, tender review, supplier selection and review	Contact details, identity data, financial situation data collected in the course of procurement management	Legitimate interest in maintaining our supplier relationships	Fulfillment of legal obligations
Implementation of marketing measures	Building customer relationships	Contact details Preferences regarding receiving marketing material from us and third parties and your communication preferences	consent	

For what purposes and on what legal basis is your personal data collected and processed? What personal data does Sodexo have?

We collect, process, and share your personal data for specific purposes, as set out in the non-exhaustive list below. We will process your personal data when necessary to provide you with access to the website or when necessary to comply with a legal obligation to which we are subject. We will also process your personal data for our legitimate interests, unless those interests are overridden by your interests or fundamental rights and freedoms. Where legitimate interest cannot be used as a legal basis for processing personal data under applicable data protection laws, prior explicit consent will be obtained where required by law.

DATA COLLECTION ON OUR WEBSITE

We automatically collect some information when you visit the website using various methods:

Cookies

Some of our pages use so-called cookies to improve user-friendliness and to personalize the website. Cookies do not cause any damage to your computer and do not contain viruses. Cookies are small text files that are stored on your computer, mobile phone or other device in the browser you use. They allow certain information to be sent to the entity that placed the cookies (in this case, this is us). This includes, for example, identification data such as your IP address, as well as statistical user data (information such as the domain name, Internet access provider and operating system, as well as the date and time of user access). The data collection is based either on your consent or on our legitimate interest in preventing fraud, improving website security and improving the user experience.

If other cookies (e.g. cookies for analyzing your surfing behavior) are stored, these will be treated separately in this privacy policy.

For more information on the use of cookies, please see our [Cookie Policy](#).

IP address and server log files

An IP address is a unique identifier used by some electronic devices to identify themselves and communicate with each other on the internet. When you visit our website, we may use the IP address of the device you are using to connect you to the website. We use this information to determine the general physical location of the device and to know which geographic areas visitors are located in.

The website provider also automatically collects and stores information in so-called server log files, which your browser automatically transmits to us. This includes:

Browser type and version

operating system used

Referrer URL

Hostname of the accessing computer

Time of the server request

This data will not be merged with other data sources.

Piano Analytics

We also use the “Piano Analytics” service on this website, operated by Piano Software, Inc., 111 S Independence Mall East, Suite 950, Philadelphia, PA 19106, USA (“Piano”).

Piano Analytics makes it possible to distinguish between individual users and individual user sessions. During your visit to and navigation on our website, your user behavior is recorded and stored through the use of Piano Analytics. The stored events can include page views, first visit to the website, start of the session, interactions with the website (including scrolling on the page), clicks on external links, internal search queries, interaction with videos, file downloads, any ads viewed/clicked, and language settings. In addition to the events, Piano Analytics also stores the approximate location (region), the IP address in anonymized form, technical information about the browser and device used (such as language settings and screen resolution), and the referrer URL. Based on the aforementioned data, Piano evaluates your use of our website and compiles anonymized reports on website activities, which we use to analyze website usage.

We only use Piano Analytics with your prior consent, which you may have given us via our cookie management tool when you first visit this website.

You can prevent cookies from being saved by selecting the appropriate settings in your browser. However, if you do, you may not be able to use all the features of our website to their full extent.

Piano's privacy policy can be found at the following link: piano.io/privacy-policy/

Social networks

You have the option of clicking on the corresponding icons of social networks such as LinkedIn, Xing and YouTube, etc., provided they appear on our website.

We do not create or use separate databases of these social networks based on the personal information you have published there, and we do not process any data related to your private life through these channels.

Links to other websites should not be considered navigational tracking, and we disclaim any responsibility for the privacy practices of these third-party companies, each of which acts as a separate data controller for your personal data within its own jurisdiction. Once you leave our website or click on the logo/link to one of these social networks, you are responsible for reviewing the privacy policies applicable to that other platform.

To whom will your personal data be shared?

Your personal data may be transferred within or outside the Sodexo Group.

- **Within Sodexo**

Sodexo is part of an international group (“Sodexo Group”).

The security and confidentiality of your personal data is important to us. For this reason, we restrict access to your personal data only to employees who need the information in order to handle your requests or provide the required

service.

We ensure that those authorized to process personal data have been bound by a confidentiality agreement or are subject to an appropriate legal obligation of secrecy.

We have also put in place appropriate safeguards to ensure an appropriate level of protection for your personal data, even if the personal data is processed by another Sodexo entity that did not originally collect your personal data.

Sodexo has implemented Binding Corporate Rules (BCRs) within the Sodexo Group. This ensures that even if third countries in which Sodexo companies conduct data operations are located outside the European Economic Area, your personal data will be protected in the same way as any company within the European Economic Area would.

- **Outside Sodexo**

We will not disclose your personal data to unauthorized third parties. However, we may disclose your personal data to authorized service providers (for example, technical service providers providing services such as hosting, maintenance, consulting, or analytics) provided that we engage such service providers to provide our services within the framework of data protection laws. We ensure that any disclosure of your personal data to an authorized service provider is subject to a contractually binding confidentiality and data processing agreement with Sodexo or another Sodexo Group company, pursuant to which the service providers so engaged may only act on the instructions of Sodexo or the other Sodexo Group company.

Service providers and/or other contractors may be located in countries where data protection laws may not provide the same level of protection as in your country.

If Sodexo or the Sodexo Group companies disclose your personal data to such recipients, we will determine and/or confirm, prior to receiving your personal data, that they provide an adequate level of protection for your personal data, including appropriate technical and organizational security measures.

In particular, if the recipients in question are located in a country that does not provide an adequate level of protection, Sodexo or, where applicable, the other companies of the Sodexo Group will implement appropriate measures, such as standard contractual clauses, to ensure such transfer in accordance with applicable law. If you would like to receive a copy of the relevant documentation, please send an email to info.at@sodexo.com.

In addition, we may disclose your personal data (i) if required by law or legal process, (ii) at the request of public authorities or other officials, or (iii) if we believe that disclosure is necessary or appropriate as part of an investigation into suspected or proven illegal activity, or to prevent physical harm or financial loss.

How long will your personal data be stored?

We will only retain your personal data for as long as necessary to fulfill the purposes for which it was collected and processed (see below). This period may be extended, where appropriate, by the period provided for by applicable laws and regulations.

Finally, please note that if we use your personal data for statistical purposes, we will anonymize it so that you can no longer be identified.

Data that, after proper anonymization, is used solely for statistical purposes will no longer be classified as personal data.

Purpose	Data categories	Duration of data storage
Personalize the website and improve the experience	IP address	The retention period is a maximum of 13 months.
	Cookies	
	Statistical data, duly anonymized.	The IP address and statistical data are retained for as long as necessary and required for the operation of the website.
Compliance with legal obligations (e.g. when managing customer and supplier relationships or providing services)	Identification data (name, surname, picture - if you have provided it)	We will retain your personal data for the duration of our business relationship with you. After that, only

Processing requests	Technical data (time and date of connection, metadata)	the data required for pre-trial or court-ordered purposes will be archived until the expiration of the legally prescribed period.
	E-Mail-Address	The regular limitation period in civil matters is three (3) years after termination of the contract.
	Personal data provided by users in their enquiries (e.g. in the contact form)	The data you provide via the contact form or by other means will remain with us until you request its deletion, revoke your consent to storage, or the purpose for storing the data no longer applies (e.g., after your request has been processed). Mandatory legal provisions—in particular, retention periods—remain unaffected.

Special categories of personal data

As a general rule, we do not collect sensitive personal data through our website. "Sensitive personal data" refers to information about a natural person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning health, or data concerning a natural person's sex life or sexual orientation. This definition also includes personal data relating to criminal convictions and offenses.

Should it be strictly necessary to collect such data to achieve the purpose of the processing, we will do so in accordance with local legal provisions on the protection of personal data and, in particular, only with your prior express consent.

Information from minors

The website and our services are intended for adults who are legally capable of entering into a contract.

Minors under 18 years of age or users without legal capacity must obtain the consent of their legal guardians before transmitting their data to Sodexo.

Your rights

Sodexo is committed to ensuring the protection of your rights in accordance with applicable laws. Below is a summary of the various ways you can exercise your rights under data protection legislation:

Rights of those affected	Description
Right to information and right to rectification	You can request a copy of the personal data we hold about you. You can also request the rectification of inaccurate personal data or the completion of incomplete personal data.
Right to erasure	Your right to be forgotten entitles you to request the erasure of your personal data where (i) the data is no longer necessary for the purposes for which it was collected; (ii) you decide to withdraw your consent; (iii) you object to the processing of your personal data; (iv) your personal data has been unlawfully processed; (v) there is a legal obligation to erase your personal data; (vi) erasure is necessary to ensure compliance with applicable laws.
Right to restriction of data processing	You may request that the processing of your personal data be restricted in cases where: (i) you contest the accuracy of your personal data; (ii) we no longer need your personal data for the purposes of the processing;

(iii) you have objected to the processing for legitimate reasons;
(iv) the processing of your personal data is unlawful and you prefer the restriction of its use to erasure.

Right to data portability	<p>Where appropriate, you may request the transfer of your personal data that you have provided to us in a structured, commonly used, and machine-readable format. You have the right to transmit this data to another controller without hindrance from Sodexo if</p> <p>(i) the processing of your personal data is based on consent or a contract; and (ii) the processing is carried out using automated means.</p> <p>You may also request that your personal data be transmitted to a third party of your choice (where technically feasible).</p>
Right of objection	<p>You can object to the processing of your personal data (for example, by exercising your opt-out option), particularly in connection with profiling or marketing communications. If we process your personal data based on your consent, you can withdraw your consent at any time.</p>
Right not to be subject to automated decisions	<p>You have the right not to be subjected to a decision based solely on automated processing – including profiling – that would have legal effects concerning you or significantly affect you.</p>
The right to lodge a complaint	<p>You have the right to lodge a complaint with the data protection authority of your habitual residence. You can also lodge a complaint with the courts of your place of residence. Contact details can be found at the following link: https://dsg.gv.at</p>
Right to withdraw consent	<p>If we have collected and processed your personal data with your consent, you can revoke your consent at any time with future effect. Revoking your consent will not affect the legality of the processing we conducted prior to your revocation, nor will it affect the processing of your personal data based on a legal basis other than consent.</p>

To exercise these rights, you can:

To exercise your rights, you can send an email to the local data protection contact: info.at@sodexo.com, or submit your request online in our data protection portal using the following link: [Online form for data subject requests](#)

Typically, no fee is required:

You will not be charged a fee to access your personal data (or to exercise any of your other rights). However, we reserve the right to charge a reasonable fee to cover our administrative costs if your request for access is clearly unfounded or excessive, or if you request further copies after we have responded to your request. Alternatively, we may refuse to respond to your request in such circumstances.

What we may need from you:

We may need certain information to verify your identity before we can comply with your request to exercise your rights. This is a security measure to ensure that personal data is not disclosed to anyone who has no right to receive it.

For further details, please see the [Sodexo Austria Global Privacy Policy](#).

Rights of Third-Party Beneficiaries.

If applicable in your country, you may exercise the third-party beneficiary rights granted to you by Sodexo's BCR.

How do we protect your personal data?

We implement all possible technical and organizational security measures to ensure the security and confidentiality of your personal data when processing it.

To this end, given the nature of the personal data and the risks associated with its processing, we take all necessary precautions to ensure data security and, in particular, to prevent falsification, damage, or unauthorized access by third parties (physical protection of the premises, authentication procedures with personal, secure access via identifiers and confidential passwords, a connection log, encryption of certain data, etc.).

Furthermore, when we engage processors to process all or part of your personal data, we require our service providers to enter into a contractual agreement guaranteeing the security and confidentiality of the personal data we transmit to them or that they collect on our behalf, in accordance with applicable data protection regulations.

We conduct regular audits to verify the proper operational application of the regulations regarding the security of your personal data.

However, you are also responsible for ensuring the security and confidentiality of your personal data, and we urge you to remain vigilant, particularly when using an open system such as the Internet.

Links to other websites/platforms

Occasionally, we provide links to other platforms for convenience and informational purposes. These platforms operate independently of our websites and applications and are not under our control. These platforms have their own privacy policies or terms of use, which we strongly recommend you read. We assume no liability for the content of these platforms, the products and services offered there, or your other use of them.

Unsubscribe from notifications and services

If you wish to opt out of receiving newsletters, notifications, or other communications from certain services you participate in or have subscribed to, please select the "Unsubscribe" function within the service or application or contact us at info.at@sodexo.com

How will you be notified if the use of your personal information changes?

We may update or change this Privacy Policy from time to time. If we do, the changes will take effect 30 business days after the date of the change. Please check this page periodically to be informed of any changes.

If you have any questions or comments regarding this Privacy Policy, please do not hesitate to contact us at the following address: info.at@sodexo.com .

Last updated: December 2024