

## Candidate Privacy Policy

This Privacy Policy describes our practices with respect to Personal Data collected in the context of the recruiting activities and talent community of Delivery Hero SE and Delivery Hero companies (please refer to section 1 below to find out more about who exactly Delivery Hero is). This Privacy Policy further provides information on your rights under applicable data protection laws.

For the purposes of this Privacy Policy, 'Personal Data' is any data which relates to an individual who may be identified from that data, or from a combination of a set of data.

For the purposes of this Privacy Policy, "Personal Data" means any information which relates to an individual who may be identified from that information, or from a combination of a set of information. Similarly, "Processing" refers to any operation performed on personal data, such as collection, storage, use, disclosure, destruction.

*This Privacy Policy does not apply if you are only a visitor of our corporate website. For our website Privacy Policy, please visit <https://www.deliveryhero.com/privacy-policy/>.*

### **1. Who is the data controller?**

Delivery Hero SE, Oranienburger Straße 70, 10117 Berlin, Germany, info@deliveryhero.com ("Delivery Hero SE") is the data controller responsible for the processing of your Personal Data on the Website and when applying for a position with Delivery Hero SE. Delivery Hero SE has subsidiaries and affiliated companies all over the world forming the global Delivery Hero group of companies ("Delivery Hero", "we"/"us"/"our"). When you apply for a job with Delivery Hero, please be aware that Delivery Hero SE and the respective Delivery Hero company which you seek employment with will both be responsible for processing your data if you use the Website to get in touch with us (the GDPR calls this joint controllership). This means you can assert your rights both against Delivery Hero SE as well as against the recruiting company of Delivery Hero. If you only apply for a position with Delivery Hero SE, Delivery Hero SE will remain the sole data controller. On the Website you will be presented with additional information on which Delivery Hero company exactly is recruiting you (as these companies might vary depending on which country you would like to work from).

You can reach Delivery Hero's data protection officer for any privacy-related questions or feedback by mailing to [dpo@deliveryhero.com](mailto:dpo@deliveryhero.com).

### **2. What type of personal data do we process and how do we use it?**

*Information you actively provide to us when you apply for a job ("Application Data"):*

We primarily receive information when you use the contact form, subscribe to job alerts or apply for a job on the Website (our "Services") on the Website. When you use our Services we may

require you to provide us with certain Personal Data such as name, email address, phone number or other contact data in order to contact you or to answer your queries. While applying for a job you may also be required to provide your resume/CV, educational certificates or a cover letter which may contain additional Personal Data. The exact data fields can be found on the application form on the Website.

We need your Application Data for the solicitation, evaluation, and selection of candidates for employment with Delivery Hero. Thus, your Application Data will be processed for the purposes of managing our recruitment related activities, which include setting up and conducting interviews or, in certain cases, background checks, and as is otherwise needed in the recruitment and hiring processes. With your consent, we will also use your Application Data to maintain our talent pool and to contact you in the future with job offers. Our legal basis for processing your Application Data are the legal provisions in your jurisdiction permitting the data processing or the purpose of performance of a contract or in order to take steps at your request prior to entering such a contract (e.g. processing your application for employment with us).

**We kindly ask you not to send us special categories of personal data without first granting your explicit consent for us to process such data (e.g. ethnic origin, political opinions, religious or philosophical beliefs). We do not need this information for the application process.**

*Information collected during cognitive assessments in the course of the application process ("Assessment Data"):*

With regard to our recruitment of programmers and technical engineers, please be aware that we might conduct certain online coding skill tests to assess your suitability for employment with Delivery Hero by asking you to solve a programming problem; these might include live-coding assessments. The tests will be conducted through an online assessment platform operated by one of our third-party providers. To invite you to do these online assessments, we will send you a direct link once you have applied for a position with Delivery Hero. You will learn more about the identity of our service provider before you start the assessment. We will process Assessment Data for the sole purpose of assisting our recruiters in determining if you will be successful in the role for which you have applied and evaluating and assessing the results of your test. We will not use the assessment result for any automated decision-making. Our legal basis for processing your Assessment Data are the legal provisions in your jurisdiction permitting the data processing or the purpose of performance of a contract or in order to take steps at your request prior to entering such a contract (e.g. processing your application for employment with us).

*Information gathered from third parties ("Third-Party Candidate Data"):*

To be able to offer you a position with our organization, we may process Personal Data collected not directly from yourself but from third parties. If this is the case, we will send you a notification

without undue delay after adding your data to our systems, e.g. by email (unless you have already received such a notification from the third party who transmitted the data to us). Your Personal Data will either be obtained from publicly available sources (e.g. career networks such as LinkedIn, Glassdoor, Indeed or others; we do not collect data from social media) or provided to us by someone who referred you for potential employment, such as a Delivery Hero employee, a recruitment agency or a headhunter. In some instances, if required to verify your information, we will initiate a limited verification process for the documentation and references you have provided by double checking your information with former employers or educational institutions. If we conduct such checks we will notify you separately in writing prior to launching the assessment.

Your Personal Data will be processed solely for the purpose of managing our recruitment-related activities, which include setting up and conducting interviews and tests for candidates, evaluating and assessing the results thereto, and as is otherwise needed in the recruitment and hiring processes. Such processing is legally permissible as it is necessary for the purposes of the legitimate interests pursued by Delivery Hero which are the solicitation, evaluation, and selection of candidates for employment.

*Information Collected During Your Registration for Our Talent Community (“Talent Community Data”):*

You might also choose to join our Talent Community without immediately handing in your application for a specific position with Delivery Hero (either by creating a job alert or using the chat bot on the Website). In this case, we will collect your Personal Data (contact details e.g. name, phone number, email address, home address, uploaded documents). We will process this data in order to keep you up-to-date for future job opportunities at Delivery Hero, provide you with updates on our business activities or ask you for feedback to let us know about your experience with Delivery Hero. The open positions are advertised through newsletters, through direct emails from our recruitment team and the general follow up messages as part of our recruitment process. If you sign up for one of our talent events (either in one of our offices or online), we will process your Talent Community Data for the aforementioned purposes as well as for the organization of the event.

The legal basis for the processing of your Talent Community Data is your consent. You are free to withdraw your consent at any point in time by de-registering from our Talent Community.

*Information to Book Travel (“Travel Booking Data”)*

To provide you a beneficial experience with our recruitment process, we might schedule onsite interviews with you at our office. In these cases, we might require certain information from you in order to be able to book travel arrangements, such as your name, email address, date of birth, passport number and other travel documents.

Our legal basis for processing your Travel Booking Data are the legal provisions in your jurisdiction permitting the data processing or the purpose of performance of a contract or in order to take steps at your request prior to entering such a contract (e.g. arranging interviews necessary for the further processing of your application for employment with us).

### *Automated Decision-Making*

Your application will always be reviewed by a human being. We do not rely on solely automated decision-making to conduct our recruitment activities.

## **3. How is your personal data shared?**

- 3.1. **Service providers.** The Website is powered by our database provider Wordpress and by the online applicant tracking system provider Workday. Your Personal Data will be processed on behalf of Delivery Hero by our data processors, cloud services providers engaged by Delivery Hero to help manage our recruitment and hiring process on our behalf. We will ensure an adequate level of protection for Personal Data processed in accordance with this Privacy Policy at any point in time. All transfers will be subject to appropriate safeguards such as binding corporate rules or approved standard contractual clauses. Where necessary, we have implemented supplementary security measures under the standard contractual clauses certified by the EU Commission to provide an adequate level of data protection for any transfers outside the EU. You can obtain a copy of the standard contractual clauses by contacting us.
- 3.2. **Group companies.** Delivery Hero is an organization with a global footprint. Therefore, we share information between Delivery Hero companies located in different countries, on a strict need-to-know basis. All Delivery Hero companies use Application Data, Assessment Data or Third-Party Candidate Data for the sole purpose of managing your application and only the Delivery Hero company which you are seeking employment with will receive your Personal Data. Delivery Hero SE will also process your Talent Community Data if you have signed up for our talent community but will not share this data with other Delivery Hero companies unless you have signaled to us that you are interested in a specific Delivery Hero company.

All Delivery Hero companies must honor this Privacy Policy as well as strict intra-group data transfer agreements. We ensure an adequate level of protection for Personal Data within the scope of the GDPR even where Personal Data is shared with a Delivery Hero company located outside the European Economic Area (EEA). As a rule, if you apply for a job in the EEA, we will not share your Personal Data with Delivery Hero companies outside the EEA unless you have let us know you are also interested in a position outside the EEA. Our legal basis for the sharing of data within Delivery Hero is Art. 6(1)(f) GDPR.

- 3.3. **Third parties.** We do not share Personal Data about our candidates with any third parties unless we have our candidates' specific permission to do so, or we share information with private or public authorities that will enable us to fight fraud and abuse on our network, to investigate suspected violations of law, or to fight any other suspected breach of applicable law. This also includes screening our candidates in relation to international sanctions in the context of international security threats, terrorism or money laundering. In any case, you will be notified before we share your Personal Data with any third parties.
- 3.4. **Business transfer.** As a matter of policy, we do not rent or sell Personal Data about our candidates with non-affiliated third parties unless we have specific consent to do so. In the event that our business or a division of our business is reorganized or sold and we transfer all or substantially all of our assets to a new owner, your Personal Data may be transferred to the buyer, subject to appropriate privacy safeguards.

#### **4. For how long do we retain your personal data?**

After your application, unless you are starting your employment with us, with your consent, we will store your Application Data for future consideration in our talent pool for a duration of 24 months after you have completed the application process (only if you have chosen to join our Talent Community). Before the end of this retention period we will contact you via email to ask you if you want to remain in our talent pool and extend your consent or if you would rather be deleted upon expiration of the initial retention period.

If you do not grant us your consent for a longer retention period, we will store your Application Data for a period of 6 months after we have let you know that we currently cannot offer you a position with our organization.

We keep all other Personal Data no longer than necessary for the purpose for which we obtained them and for any other permitted compatible purposes, including compliance with legal obligations in the field of employment law. Group records management schedules document the applicable minimum retention periods required by local laws.

#### **5. What legal rights do you have?**

Data protection laws provide you with various legal rights and we are committed to respecting them. For this purpose, we strive to provide clear and transparent information about your rights and make it as convenient as possible for you to exercise them.

Under the GDPR, you are entitled to the following rights:

<b>Right to access</b>	You have the right to access your personal data and obtain additional information on how we process it. You may also request a copy of the data we maintain relating to you.
<b>Right to rectification</b>	If you notice that your personal data is incorrect, you can always request that we correct it.
<b>Right to erasure</b>	You have the right to ask us to delete your personal data. Please note that even if you exercise this right, we may be required to retain some of your information if we process it as part of our legal obligations.
<b>Right to restriction of processing</b>	If you have requested the deletion of your personal data, but we are legally obliged to retain some of it, we will store your data in our archives and only reintegrate it into our operational systems with your consent. However, you will not be able to use our Services during this time, otherwise we will need to process your data again.
<b>Right to data portability</b>	You can ask us to transmit your personal data in a machine-readable format to you or to another data controller. However, please note that this right only applies to personal data that we process under a contract or with your consent.
<b>Right to object</b>	<b>You have the right, for reasons arising from your particular situation, to object at any time to any processing of your personal data, which is processed on the basis of our legitimate interests. If you object, we will no longer process your personal data unless we can prove compelling grounds for the processing that outweigh your interests, rights and freedoms or the processing serves to assert, exercise, or defend against legal claims.</b>
<b>Right of complaint</b>	You can raise a complaint about our processing with the data protection authority in the EU Member State of your habitual residence, place of work, or the place where you think a violation of the GDPR has occurred. In the case of cross-border data processing, you can also lodge a complaint with our lead supervisory authority in Berlin, Germany.

**Right not to be subject to a decision based solely on automated processing**

You have the right to object to a fully automated decision (i.e. without any human intervention in the decision-making process) that has legal effects or significantly affects you.

If you would like to exercise your legal rights under the GDPR, please contact us under [taops@deliveryhero.com](mailto:taops@deliveryhero.com).