

## **Privacy Statement for Employees**

This privacy statement (“Statement”) explains how Takeaway.com Group B.V. and its subsidiaries and affiliates (“JET”, “we”, “us” or “our”) collect, use, disclose, and otherwise process personal data and applies to the processing of the personal data of all JET employees and where applicable other workers, including independent contractors. This Statement is not applicable to Grubhub Holdings Inc. (“Grubhub”) and Grubhub’s subsidiaries or affiliates. For the purpose of this Statement, other workers shall include non-executive directors, temporary employees, agency staff, secondees, interns, independent contractors and consultants, professional advisors, other third parties engaged by JET to carry out work for us and who have access to our internal systems. This categorisation does not demonstrate a particular status.

JET is responsible for the processing of your personal data and takes your privacy seriously. JET therefore adheres to the requirements of the applicable privacy and data protection legislation when processing personal data. Unless otherwise stated, the data controller for processing these personal data is JET and/or the JET Affiliate (excluding Grubhub) with whom you have an employment relationship or that otherwise decides which of your personal data is collected.

It is important that you read this Statement, together with any other privacy statement that may apply to you or that we may provide on specific circumstances or to specific services (such as when you order via our platform as a customer or use our application Scoober) when we are collecting or processing personal data about you, so that you are aware of how, why we are using such data, your rights regarding your personal data and how to exercise them.

### **What personal data we process and why**

Personal data, in this Statement also referred to as “your data”, means any information or set of information from which we are able, directly or indirectly, to personally identify you, in particular by reference to an identifier, e.g. name and surname, email address, phone number, etc. It does not include data where the identity has been removed (anonymous data).

JET processes your personal data because you work at JET via an employment agreement or employment at will. We use the following personal data for the following purposes:

#### *1. Employment relation*

We process your personal data because you work at JET. We process your personal data to fulfill our obligations and responsibilities as an employer for example, paying your salary, scheduling your shifts, for our personnel records, tax obligations, pension commitments, investigate potential breaches of laws or regulations and/or our internal policies (whether by you or anyone else), training, trips, relocation or similar purposes. The legal ground for this processing is the performance of our employment contract with you, for us to comply with legal obligations and/or to pursue our legitimate interests, and/or any other legal basis otherwise

permitted in accordance with the applicable data protection regulation. We may process the following personal data for the purposes described above:

- Name
- Identification details/documents
- Contact details
- Address details
- Employment and recruitment details
- Gender details
- Educational details
- Payment and remuneration details
- Holiday and leave details
- Number of hours worked (if applicable)
- Right to work details (if applicable)
- Family details (if applicable)
- Training and development details (if applicable)
- Car lease details (if applicable)
- Travel details (if applicable)
- Information relating to relevant external business and other interests (e.g. trusteeships and directorships), if applicable and where permitted by local law

## 2. *Purposes that requires processing of special and/or sensitive personal data*

There are "sensitive categories" of personal data which require a higher level of protection. JET only processes your sensitive personal data when strictly necessary and to the extent required for a specific purpose. For example, to provide you with health support, sick or maternity/paternity leave, background checks (if applicable), legal investigations, whistleblowing or payment and remuneration processes or similar reasons.

JET values diversity and inclusion. Equal employment opportunities mean we offer equal treatment to all employees. In order to ensure equal employment opportunities as permitted or required by local law we may gather sensitive personal data for this purpose.

The legal ground for this processing is the performance of our employment contract with you, for us to comply with legal obligations, and/or any other legal basis otherwise permitted in accordance with the applicable (data protection) regulation. We may process the following personal data for the purposes described above:

- Leave details (including return to work documents)
- Assessment details
- Health details
- Racial/ethnic origin details
- Details on your membership of or affiliation to any trade union

- Details relating to any threatened or actual criminal proceedings or convictions to the extent that they affect your employment; and/or
- Other sensitive personal data that you voluntarily provide to JET (including to your colleagues / other JET employees or workers) in the course of your work

### 3. *Security and safety*

JET processes personal data through the JET equipment (as may be delivered to you) and infrastructure for safety, fraud and misconduct investigation and enforcement, authority investigations, and security purposes. The legal basis for this processing operation is that it is needed to pursue the legitimate interest of JET, for us to comply with legal obligations and/or to protect the vital interest of our employees as permitted by applicable data protection regulation. We may process the following personal data for the purposes described above:

- Security camera data
- Call history
- System logs
- Network traffic data
- Device identification numbers
- Account login information
- IP addresses
- Internet access logs
- Communications data

### 4. *Analytics*

JET may also use your personal data to be able to analyse your use of JET applications and/or third party tools used within the JET organisation, in order to improve the applications/tools you use and monitor your performance where applicable. The legal basis for this processing operation is that it is needed in pursuing a legitimate interest of JET (analysis & reporting) as defined in applicable laws. Where legally required or permitted, we may process your personal data based on your consent. If we rely on your consent as a legal basis for processing your data, you may withdraw your consent at any time.

### 5. *Employee benefits*

As an employer, JET may provide you with benefits such as the ones provided through JET's platform and services for business ("JET for Business") and JET's for Business Card, company events, annual gifts, bonus or incentive scheme, apprenticeships, trainings and similar (together, the "Benefits"). To provide you with these Benefits JET will process your personal data, and, depending on the benefit provided to you, may process your personal data for various purposes which are connected or related to the operation, performance, development, optimizing and the maintenance of the Benefits such as issuing the Benefits, shipping the

Benefits to your residential address, processing orders and transactions, conducting checks and verifications, etc. The legal basis for this processing operation is the performance of your employee contract and/or the legitimate interest of JET. Where legally required or permitted, we may process your personal data based on your consent. If we rely on your consent as a legal basis for processing your data, you may withdraw your consent at any time. We may process the following personal data for the purposes described above:

- Name
- Identification data
- Address details
- Contact details
- Payment and remuneration details (if applicable)
- Transaction data (e.g. card number, order amount and merchant related information) (if applicable)
- Employment details (if applicable)
- Travel data (if applicable)
- Allowance data (if applicable)

#### 6. *Employee surveys*

JET may ask you as an employee to participate in surveys to improve the JET business processes or to ask your opinion on a certain matter. We may ask you to do so by sending you an email. JET's legal basis for sending this email is its legitimate interest. Participation in a survey is always voluntary. If we rely on your consent as a legal basis for processing your data, you may withdraw your consent at any time. The personal data processed for these surveys depend on the specific survey. We may process the following personal data for the purposes described above:

- Name
- Contact details
- Employment details (if applicable)
- Survey details

#### 7. *Employee contests and campaigns*

JET may from time to time organise contests or campaigns for employees. Your participation in these contests is always voluntary. Legal basis for this processing is your consent or JET's legitimate interest. If we rely on your consent as a legal basis for processing your data, you may withdraw your consent at any time. The personal data processed for these contests/campaigns may depend on the specific contest/campaign. We may process the following personal data for the purposes described above:

- Name
- Contact details

- Employment details (if applicable)
- Payment details (if applicable)
- Contest or campaign details

#### 8. *Employee performance evaluation and improvement*

As an employer, JET may evaluate your performance to evaluate the employment relationship, be able to help you to give you feedback, improve your performance, to reward you for good performances, and/or for potential position change and career development or similar purposes. As part of this JET may record calls, keep track of disciplinary records to monitor the employment relationship with you or provide you with training opportunities to improve your performance. The legal ground for this processing is the performance of our employment contract with you, for us to comply with legal obligations or to pursue our legitimate interests, and/or any other legal basis otherwise permitted in accordance with the applicable data protection regulation. We may process the following personal data for the purposes described above:

- Name
- Identification details
- Contact details
- Employment details
- Educational details
- Assessment details
- Feedback details
- GPS and vehicle tracking details (applicable for use of JET cars)
- Payment and remuneration details
- Disciplinary details (if applicable)
- Performance details (if applicable)
- Call recordings (if applicable)
- Content of correspondences between JET and you

#### 9. *Employee communications*

JET may also want to reach out to you to share information related to your employment, Benefits, or other purposes. JET's legal basis for communicating you is legitimate interest or where legally required or permitted, your consent. If we rely on your consent as a legal basis for processing your data, you may withdraw your consent at any time. We may process the following personal data for the purposes described above:

- Name
- Contact details
- Address details
- Message details
- Job details

## 10. *Fraud prevention*

We also process personal data to prevent fraud and prevent other forms of misuse on and via our services. The legal basis for this processing activity is that it is needed in pursuing a legitimate interest of JET and/or complying with our legal obligations. We may process the following personal data for the purposes described above:

- Name
- Contact data
- Device information
- IP address
- Browser information

### **Additional purposes**

We will only use your personal data for the purposes described above, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we want to use the data for a different purpose, we will take appropriate measures to inform you, consistent with the significance of the changes we make. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where required by applicable data protection law.

### **Automated decision-making and profiling**

For the purposes described above we may use automated decision-making and profiling. Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention. We make sure measures are in place to safeguard your rights when we use automated decision-making.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you. If you want to object to this type of processing, you can contact us via our [privacy form](#). We will then proceed to reassess the situation and/or provide you with more information about why and how such automated decision was made.

### **Sharing of your personal data**

JET may work and/or share data with other companies within the JET group and other third parties in order to carry out the processing described above.

These group companies and third parties will process your personal data on behalf of us as data processors or as autonomous data controllers (or in a position as so defined or referred under applicable data protection law including concepts as the equivalent of controller or processor), and have access to your personal data for the purposes described in this Statement. We require group companies and third parties to protect it in accordance with the standards set out in this Statement and we take appropriate measures pursuant to the

applicable data protection laws to ensure the same level of protection and confidentiality of your personal data.

We will also share your data with other third parties where appropriate or required by applicable law or regulation (including a court order or legal authority request) or where we believe disclosure is necessary to exercise, establish or defend legal rights or to protect the vital interests of any person. Such third party controllers may include law enforcement agencies.

We may also disclose your data to any company or prospective buyer of all or substantially all of our assets in connection with any sale or transfer of those assets.

Your personal data may be shared with the following parties:

- JET's affiliates, subsidiaries and/or group companies of JET
- Service providers such as providers for software, hosting, delivery, logistics, information security, etc.
- Implementation partners
- Professional consultants
- Payroll, insurance and social security companies
- Pension authorities
- External employers and relocation agencies
- Car leasing firms and transport companies
- Parties that manage or run Benefits, such as the share or option schemes for employees
- Governmental or regulatory authorities
- Visa and tax authorities
- When applicable, with merchants, payment service providers, and JET for Business Card Partners such as Adyen (for their privacy statement please see [here](#)). JET for Business Card Partners may change from time to time at the discretion of JET.
- Prospective buyers
- Any other party provided that you have given your consent to the disclosure

Whenever we use third-parties to process personal data, we take appropriate measures pursuant to the applicable data protection law to guarantee equal level of protection and confidentiality of your personal data.

### **Where your data gets sent**

If you are in the European Economic Area (EEA), Israel, Australia, New Zealand and Canada, please be aware that we may process and/or transfer your personal data outside of the EEA, Israel, Australia, New Zealand and Canada. This may include transferring it to or accessing it from other jurisdictions, including jurisdictions that may not provide a level of protection equivalent to the your local- and/or data protection laws ("Non-Adequate Country"). Where we transfer personal data outside the EEA, Israel, Australia, New Zealand and Canada we will take into account any applicable statutory obligations relevant to personal data transfers, and in Non-Adequate Country, we will rely on appropriate safeguards, including EC approved standard

contractual clauses or other lawful binding transfer mechanism pursuant to the applicable data protection law.

### **How long we keep your data**

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, whether we can achieve those purposes through other means, and the applicable legal, contractual or similar requirements to retain your personal data.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

### **Rights, questions or complaints**

We inform you that, with regard to the personal data, you can exercise the rights available and provided for by, and pursuant to applicable data protection laws, which may include the right to request access to, rectification of, or erasure of personal data or restriction of processing, and to object to processing, the right to data portability, to withdraw your consent at any time (without prejudice to the lawfulness of the processing based on the consent given prior to the withdrawal) as well as to lodge a complaint with a supervisory authority.

Please keep in mind that email communications are not always secure. Therefore, please do not include sensitive information in your emails to us.

We will do our best to address your request in time and free of charge, except where it would require a disproportionate effort. In certain cases, we may ask you to verify your identity before we can act on your request.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data. If you share with us data of other people, it is your responsibility to collect such data in compliance with local legal requirements. For instance, you should inform such other people, whose data you provide to us, about the content of this Statement and obtain their prior consent.

For more information about our use of your personal data or exercising your rights as outlined above, please contact our Group Data Protection Office via our [privacy form](#) or the contact details set out below.

### **Security**

JET takes personal data protection seriously and we therefore take appropriate measures to protect your personal data against misuse, loss, unauthorised access, unwanted disclosure, and unauthorised alteration.



Within JET we limit the access to your data as much as possible and only provide our employees access to your data on a “need-to-know” basis.

If you feel that your personal data are not adequately protected or there are indications of misuse, please contact us on [privacy form](#).

### **Updates to this Statement**

We may update this Statement from time to time in response to changing legal, technical or business developments. When we update our Statement, we will take appropriate measures to inform you, consistent with the significance of the changes we make. Where required by applicable data protection law, we will obtain your consent to any material changes to this Statement.

We encourage you to periodically review this Statement for the latest information on our privacy practices.

To the extent we have local language versions, the English version of this Statement shall prevail in case of conflicts between the different language versions.

### **Contact us**

If you have any questions or concerns about this Statement and/or our privacy practices, please contact us via our [privacy form](#) or by contacting our DPO Office [here](#).

Just Eat Takeaway.com Data Protection Officer - Takeaway.com Group B.V.  
Piet Heinkade 61  
1019 GM Amsterdam  
The Netherlands

This Statement may be updated and was last updated on 08.03.2023.