

## Privacy Statement for Scoober App

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 personal data of couriers (“Courier”) employed by us or couriers (“Driver”) engaged through a third party. In order to have our Scoober delivery service function properly, we collect and use certain of your personal data.

Personal data, or personal information, means any information about you from which you can be identified. It does not include data where the identity has been removed (anonymous data). At JET we are committed to protecting the privacy of everyone in the community and would like to inform you via this Statement regarding the personal data processed within the Scoober App (“App”), the way we process this personal data and the purposes of the processing.

Where you are an employee of JET, JET may collect and process additional information about you in the management of the employment relationship. If you are engaged through a third party, JET will process some additional information on the basis of our legitimate interests to manage our relationship with you. More details of this processing are set out in our Employee Privacy Statement. In case of conflicts between this Statement and the Employee Privacy Statement the clauses of this Statement will prevail.

It is important that you read this Statement, together with any other privacy statement we may provide on specific occasions 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

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).

The moment you start your shift with us, you are required to activate the App. From this moment the following data that may be processed by the App are:

- First and last name
- E-Mail address and Password
- Timestamps relating to:
  - Your accepted shifts;
  - Your start and end times; and
  - Your job interactions, including geo-fenced timestamps connected to order collection and delivery
- Your live GPS location

- Your availability and planned absence
- Phone number
- Device data collected for analytics purposes, including your model, manufacturer, MAC Address and software version.
- Chat Communication

## **Why we process personal data**

When using the App, JET may process your personal data for the following purposes:

### *1. Shift planning and human resources*

To enable you to work as a Courier, the App provides you with the option to give your availability and plan your working shifts. The App also enables you to contact the JET Human Resources department for any comments or questions (e.g. to inform us about sickness). The legal ground for this purpose is the performance of our contract with you and/or legitimate interest of JET.

### *2. Order delivery planning, optimisation and performance monitoring*

Your live GPS location is processed for order delivery, optimisation and performance monitoring reasons. This enables us to run our delivery service as effectively as possible and subsequently ensure that orders are allocated to you and you only have to ride the shortest distance possible each time. To enable the order delivery the App provides a chat function to communicate directly with order dispatchers to discuss possible issues. The legal ground for this purpose is the performance of our contract with you and/or legitimate interest of JET.

Your GPS location is processed during your active shift or 30 minutes pre-shift if you actively activate your App early. As soon as you actively end your shift or start a pause (stop/pause button in the App) your GPS location will no longer be collected. Your GPS location is relayed to us at 15 second intervals. Motion data are processed via the App by default but will not be registered or used by us.

### *3. Food Tracker*

Your live GPS location, together with your first name, is relayed to the customer during the delivery of the order. We call this the Food Tracker. This Food Tracker enables customers to easily check the status of their order, and allows them to identify your live location for the duration of your delivery (with consumers able to track your live location once you have collected their order). The legal ground for this purpose is the legitimate interest of JET.

### *4. Support questions*

The App allows you to ask support questions related to the App or your job. JET will use this

data to provide you with the necessary support. The legal ground for this purpose is the performance of our contract with you and/or legitimate interest of JET.

#### 5. *App Analytics*

Personal data that is processed within the App is also used by us for analytical purposes and to improve the App and delivery process. Analytics data will be anonymised as much as possible and will never be used for purposes other than the improvement of the App and processes. The legal basis for this processing of personal data, is the legitimate interest of JET unless your consent is necessary according to the applicable law.

#### 6. *Performance improvement and evaluation*

If you are an employee of JET or working as a Driver but employed by a third party employer, JET will also use your personal data to improve the Driver performance on both a global and individual level. The following data is gained via the Scoober App, Salesforce, Shiftplanning tool, Job Dashboard and DispoHub tool for the following purpose:

- Driver's data on Salesforce, like first name, last name, phone number, email address, recorded notes from previous evaluations, etc.
- Orders delivered
- GPS data at the time of the acceptance stage
- Estimated Delivery Duration, Estimated Pickup Duration
- Timestamps of order milestones (acceptance, scheduled arrival at restaurant, arrival at restaurant, order fetched, arrival at destination, order delivered)
- Planned availability
- Worked shift data (planned and worked hours, login and logout times, shift cancellations and excused/unexcused absences)
- Performance Entries raised by Live Ops Agents during the shift to flag incidents to the Driver's manager
- Performance Entries raised by Local Ops to flag incidents to the Driver's manager

The data gained through the App together with your employment data will be used for your individual performance evaluation. Your evaluation will always involve the judgment of the Hub- and/or City Coordinators and will never be based solely on the gained data or on automated decision making.

#### 7. *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
- GPS data

#### *8. Travel reimbursement*

Your live GPS location is processed to track the overall distance you traveled during your shift. This process enables us to reimburse your traveled kilometers based on the most accurate metric. The legal ground for this purpose is the performance of our contract with you and/or legitimate interest of JET.

Your GPS location is processed during your active shift. Your GPS location is relayed to us at 15 second intervals. Motion data are processed via the App by default but will not be registered or used by us. We use an automated decision making process to assess whether the accuracy of the GPS data is within a predetermined threshold. The legal ground for this purpose is the performance of our contract with you and/or legitimate interest of JET

#### **Our use of tracking technologies**

All of our uses of your data make use of tracking technologies on your device. Mobile users can often refuse tracking or reset their device identifiers (which will reset any prior tracking history) through the settings menus on their device. Please note that if you turn off the tracking settings on your phone, the App will not work properly and your phone will prompt you to switch the location settings back on. We really need your exact GPS location to provide you with App's core services and turning this off means that the App cannot notify you of delivery opportunities, which will impact your ability to make money and may be contrary to the terms of your employment. For more information on our use of tracking technologies we refer you to our cookie statement.

#### **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.

We may use your data to create data in aggregate and/or de-identified format to be able to conduct internal research and analytics, improve our application process and any other legally permissible purpose.

### **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.

We for example use automated decision-making to select the orders that will cost you the least amount of time to deliver as a Courier. These automated decisions are always under control of a natural person.

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 an automated decision was made.

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

JET, as a globally operating company, has to take into account various local data retention requirements. 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, tax, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we take into account the following criteria:

- (i) the period required to serve the respective business purpose;
- (ii) to the extent reasonably necessary to comply with an applicable legal requirement; or
- (iii) as advisable in light of an applicable statute of limitations.

In the event the data falls into more than one retention terms category, the category with the longer retention requirement shall prevail, other requirements (such as access, security etc.) notwithstanding.

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. If you have any questions on the way we retain your personal data you can contact us via our [privacy form](#).

### **Sharing with customers and Partners**

When using the App during the delivery of an order, both the Partner (restaurant partner, grocery store, convenience store or other business partner; collectively called “Partner”) and the customer will be able to see your first name and your location while you are on delivery. Your personal data will only be shared with the customer and Partner during the delivery of the order and will no longer be available once the order has been delivered.

### **Sharing with others**

JET may work 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 may 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 privacy statement. We require group companies and third parties to protect it in accordance with the standards set out in this privacy statement and we take appropriate measures pursuant to the applicable data protection laws to guarantee the same level of protection and confidentiality of your personal data. Third party service providers may share your personal data to comply with their own legal obligations such as with law enforcement agencies.

We may also share your personal data with other third party data controllers 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 personal 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
- Software providers such as providers for software, hosting, application support, delivery, logistics, information security, etc
- Third parties who undertake various activities to promote, market or support our Services. This includes social media platforms like Facebook, offshore customer support agents, marketing service providers, eCRM partners who manage our marketing emails and push notifications
- Implementation partners, professional consultants
- Law enforcement, governmental or regulatory authorities (including insurance companies, visa and tax authorities)
- 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**

JET operates, and processes personal data globally. This may result in processing of your personal data in countries, including the United States, whose data protection laws may differ from those where you live.

If you are in the European Economic Area (EEA), Switzerland, Israel, Australia and the United Kingdom (UK), please be aware that we may process and/or transfer your personal data outside of these aforementioned countries. 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”). You may see the list of Adequate Countries [here](#) as adopted by the European Commission.

When we transfer personal data outside the countries listed here we adhere to applicable and appropriate safeguards and transfer mechanisms to ensure safe transfer of your personal data. We provide appropriate and adequate protection for the transfers of personal data to countries outside of the aforementioned countries through a series of agreements with our service providers based on [Standard Contractual Clauses](#) adopted by the European Commission (and their approved equivalents for [the UK](#) and [Switzerland](#)), and the EU-U.S. Data Privacy Framework (“[EU-U.S. DPF](#)”), the [UK Extension](#) to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (“[Swiss-U.S. DPF](#)”), as set forth by the U.S. Department of Commerce. You may request a copy of the contractual clauses applicable to transfer of your personal data depending on which country your personal data may be transferred to.

In addition to appropriate contractual safeguards we adopt following organisational and technical measures for protection of your personal data during its transfer outside of the aforementioned countries including:

- securing personal data when in transit, including through encryption, and at rest;
- mandating training regarding privacy and data security at JET;
- implementing internal policies and procedures to limit access to, and use of personal data; and
- limiting unauthorised access to your personal data, except where required by applicable law or you have consented to the access.

You may contact us via our [privacy form](#) or the contact details set out below if you need more information on cross border data transfers, or to request copies of applicable contractual safeguards.

### **Your privacy rights**

#### **How to exercise of privacy rights or complaints**

If you have any questions about your privacy rights or you wish to exercise the

abovementioned rights you may contact us via our [privacy form](#) or the contact details set out below.

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

We inform you that, with regard to your personal data, you can exercise the rights provided for by, and pursuant to applicable data protection laws, which may include:

***Right of access***

You have the right to access and be informed about your personal data processed by us. You can request a copy of your personal data by contacting us.

***Right to withdraw consent***

In case the processing is based on a consent you may withdraw your consent at any time free of charge. Withdrawing a consent may lead to fewer possibilities to use our Services. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

***Right to rectify***

You have the right to have incorrect or incomplete personal data we have stored about you corrected or completed by contacting us. You can correct or update some of your personal data through your customer account.

***Right to erasure***

You may also ask us to delete your personal data from our systems. We will comply with such a request unless we have another legal ground to not delete the data in terms of applicable laws.

***Right to object***

You may have the right to object to certain use of your personal data if such data are processed for other purposes than necessary for the purposes set out in this Statement or for compliance with a legal obligation. If you object to the further processing of your personal data, this may lead to fewer possibilities to use our Services.

***Right to restriction of processing***

You may request us to restrict processing of personal data for example when your data erasure, rectification or objection requests are pending and/or when we do not have other legal

grounds to process your data. This may however lead to fewer possibilities to use our Services.

### ***Right to data portability***

You have the right to receive your personal data processed in accordance with this Statement in a machine-readable format, so that you can store this data in a database of yours or of a third party.

### ***Right to lodge a complaint***

You have the right to lodge a complaint with the relevant supervisory authority if you consider that processing of your personal data is infringed.

### **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](#).

### **Your use of Partner and Consumers’ data**

When delivering orders, you also receive data from consumers and our Partners. We would like to point out to you that such data (such as name, address and telephone number) may only be used for the delivery of the order. The use of this data for other purposes than the delivery of the order is prohibited by law.

### **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  
Netherlands

### **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 discrepancies between the different language versions.

This privacy statement may be updated and was last updated on \_\_\_\_\_2024