

# Privacy Statement

## Wolt Speak Up

October 12, 2023

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At Wolt we take data protection seriously.

This Privacy Statement applies to whenever Wolt Enterprises Oy and/or local country-specific Wolt companies belonging to the same group of companies (“**Wolt**”, “**we**”) process personal data in the context of Speak Up channel and investigation of whistleblowing reports.

We process personal data in accordance with data protection legislation. Data protection legislation means the data protection legislation in force from time to time, such as the EU General Data Protection Regulation (2016/679) and any applicable national data protection legislation.

Any data protection related terms that are not defined in this Privacy Statement shall be construed in accordance with data protection legislation. In this Privacy Statement, the word “**you**” refers to a data subject.

Kindly note that other privacy policies apply to the services and other processing activities conducted by Wolt. General Privacy Statement can be found [here](#).

This Privacy Statement may be updated from time to time in order to reflect the changes in data processing practices or otherwise. You can find the current version on this website.

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### 1. DATA CONTROLLERS

In relation to the processing of personal data under this Privacy Statement, both Wolt Enterprises Oy and the local Wolt group company may act as data controllers or joint controllers.

When Wolt Enterprise Oy and a local Wolt group company act as joint controllers, Wolt Enterprise Oy and the local Wolt group company in question together determine how the personal data in the reports is processed.

You can use the contact details mentioned below in section 2 to contact any of the data controllers or joint controllers.

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## **2. CONTACT DETAILS**

Wolt Enterprises Oy

Business ID: 2646674-9

Correspondence address: Pohjoinen Rautatiekatu 21, 00100, Helsinki, Finland

Our data protection officer can be reached through the above contact details or by sending e-mail to [privacy@wolt.com](mailto:privacy@wolt.com)

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## **3. PERSONAL DATA PROCESSED AND SOURCES OF DATA**

We process personal data only to the extent necessary and appropriate for the specific processing purpose. The data subjects whose personal data is collected and further processed can be divided into two general categories: whistleblowers and other data subjects.

### **Whistleblower's personal data**

The provision of personal data is neither a statutory nor contractual requirement; you are not obliged to provide your personal data. The Speak Up tool can be used without providing your personal data as part of the report, using the anonymous report option. You may, however, voluntarily disclose personal data as part of the reporting process, in particular:

- First and last name;
- Country;
- Telephone number;
- Email address;

- Your credentials to the Speak Up tool;
- Other personal data provided by you in the report or during the investigation.

### **Other data subjects' personal data**

When a whistleblower files a report and during an investigation Wolt may receive personal data concerning other data subjects involved in reported breach. The data subject may include for example individual(s) suspected of the breach, witnesses, investigators, and external advisors. The personal data may include but not limited to the following data:

- First and last name;
- Country;
- Telephone number;
- Email address;
- Other personal data provided in the report or during the investigation;
- Transcripts of interviews and any written evidence concerning the investigation.

Personal data is collected via the Speak Up tool when a whistleblower files a report and during the further investigation process.

During the investigation, the individuals may be contacted, and further details may be asked from the individual and the personal data may be collected also from other sources in accordance with applicable laws.

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## **4. THE PURPOSES AND GROUNDS FOR THE PROCESSING**

We process personal data only to the extent necessary and appropriate for the specific processing purposes. Please note that one or more of the following purposes and legal grounds may apply simultaneously.

Firstly, personal data is processed for the purposes of reporting, handling reports and investigating suspected breaches and, where necessary, for the establishment, exercise or defense of legal claims and/or for participation in other administrative and legal proceedings or providing information to competent authorities. In certain jurisdictions Wolt is required to maintain whistleblowing channels and in addition Wolt may have legal obligations to handle and investigate whistleblowing reports under applicable law.

The legal basis for the processing personal data is either compliance with legal obligations under applicable laws or legitimate interests of the controller or a third party to ensure i) compliance with applicable laws and/or applicable code of conducts and/or company policies, and/or ii) Wolt's aim to promote openness and transparency at Wolt; and/or iii) process the personal data within the Wolt group of companies and between Wolt and DoorDash Inc. in accordance with this Privacy Statement. When the processing of personal data is based on legitimate interests, we weigh our own interests against your right to privacy. You have the right to object processing of your data on the basis of legitimate interest.

However, Wolt can refuse such an objection in accordance with applicable legislation. For further information, please contact our data protection officer ([privacy@wolt.com](mailto:privacy@wolt.com)).

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## 5. TRANSFER TO COUNTRIES OUTSIDE EUROPE

Wolt stores your personal data primarily within the European Economic Area. However, we have service providers, operations and group companies in several geographical locations. As such, we and our service providers may transfer your personal data to, or process it in, jurisdictions outside the European Economic Area.

We will take steps to ensure that the personal data receives an adequate level of protection in the jurisdictions in which they are processed. We provide appropriate and adequate protection for the transfers of personal data to countries outside of the European Economic Area through a series of agreements with our service providers based on the [Standard Contractual Clauses](#) or through other appropriate safeguards.

More information regarding the transfers of personal data may be obtained by contacting us on any of the addresses indicated above.

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## 6. DATA RECIPIENTS

We only share your personal data within our organization and with our parent company DoorDash inc. if and as far as reasonably necessary for the purposes of this Privacy Statement.

Furthermore, we may provide your personal data to our group companies or to authorized service providers who perform services for us. The Speak Up tool provider [People InTouch](#) is also our personal data processor.

Personal data may be shared with external advisors and/or investigator(s) who provide, for example, with legal assistance in connection with the handling of a specific report or investigations.

When personal data is processed by third parties on behalf of Wolt, Wolt has taken the appropriate contractual and organizational measures to ensure that personal data is processed in accordance with applicable laws and subject to our instructions and appropriate obligations of confidentiality and security measures.

We may share your personal data with third parties outside Wolt if it is necessary to: (i) meet any applicable law, regulation, and/or court order; (ii) detect, prevent, or otherwise address fraud, crime, security or technical issues; and/or (iii) protect the interests, properties or safety of Wolt, or third parties as far as in accordance with the law. In addition, we may share your personal data with third parties outside Wolt with your consent if required under applicable laws.

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## **7. STORAGE PERIOD**

Different countries have differing rules on how long personal data gathered from the whistleblowing reports may be processed.

Wolt does not store your personal data longer than provided for in the applicable national legislation and necessary for the purposes outlined in this Privacy Statement.

The storage period depends on the nature of the information and on the purposes of processing. The maximum period may therefore vary per use.

We assess regularly the storage period for personal data to ensure the data is stored only for the necessary time period.

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## 8. YOUR RIGHTS

As a data subject you have a set of rights provided for by the data protection legislation. Please however note that the specific application of the rights depends on the processing situation. For example national whistleblowing legislation may, in certain circumstances, restrict some of the rights for the purpose of protecting possible investigations.

### *Right of access*

You have, subject to applicable national legislation, the right to access and be informed about your personal data processed by us. You have the right to receive confirmation of whether we process your personal data and, if the personal data is processed, subject to applicable law, to receive access to the personal data as well receive a copy of the personal data. This right may be restricted by national laws for the protection of the integrity of investigations.

### *Right to rectify*

Subject to applicable laws, you have the right to have incorrect or incomplete personal data we have stored about you corrected or completed by contacting us.

### *Right to erasure*

Subject to applicable laws, you may ask us to request the erasure of your personal data in accordance with the requirements of data protection legislation. We will comply with such a request unless we have a legal ground to not delete the data.

### *Right to object*

You have the right to object to the processing of your personal data which is based on a legitimate interest in accordance with the requirements and conditions of data protection legislation.

### *Right to restriction of processing*

Subject to applicable laws, you may request us to restrict processing of personal data in accordance with the data protection legislation. This right may be restricted by national laws for the protection of the integrity of investigations.

### *Right to data portability*

Subject to applicable laws, you have the right to receive the personal data you have provided to us yourself in a structured and commonly used format and to independently transmit those data to a third party.

### *Right to withdraw consent*

In case the processing is based on a consent granted by the data subject, the data subject may withdraw the consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

### *How to use your rights*

The abovementioned rights may be used by sending a letter or an email to us on the addresses set out above, including the following information: the full name, address, e-mail address and a phone number. If you are a whistleblower, you may also send your request using the Speak Up tool.

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## **10. LODGING A COMPLAINT**

In case a data subject considers our processing of personal data to be inconsistent with the applicable data protection laws, the data subject may lodge a complaint with the local supervisory authority for data protection in Finland, the Data Protection Ombudsman ([tietosuoja.fi](https://tietosuoja.fi)).

Alternatively, the data subject may lodge a complaint with the other local and competent supervisory authority for data protection.

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## **11. INFORMATION SECURITY**

Privacy and information security are at the heart of Wolt.

We use administrative, organizational, technical, and physical safeguards to protect the personal data we collect and process.

Measures include for example, where appropriate, encryption, pseudonymization, firewalls, secure facilities and access right systems. Our security controls are designed to maintain an appropriate level of data confidentiality, integrity, availability, resilience and ability to restore the data. We regularly test the Wolt Services, systems, and other assets for security vulnerabilities.

Furthermore, access to Speak Up reports, investigation material and related personal data is restricted to the dedicated persons.

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