

THIS IS A MOCK POLICY OF “ORDEROO INC.”
A COMPANY SIMILAR TO DELIVEROO/ DOORDASH /JUST EAT/ UBER EATS etc.

ORDEROO INC. PRIVACY POLICY

We process your personal data in the following way:

1. Your email address. You provide us with your email address when registering for the service. We use your email address for the following purposes: unique identifier, it serves as a unique identifier allowing you to set up and log in to your account (contractual necessity); account access, to let you reset your password if you forget it (contractual necessity); transaction-related-communication, to send you receipts of your orders (legal obligation: to issue receipts, according to the Receipts Act); distribution of own advertising, to send you advertisements of our own services, new functionalities or new order options (legitimate interest: informing the consumers about the available offers and features, and promoting them); distribution of third-party marketing, to send you advertisements of vendors selling their products on our site (legitimate interest: to subsidize the price of the service with payments from the vendors we promote); tracking transaction history, we keep it as a part of your order history data in case it becomes necessary to reveal it to investigative authorities (legal obligation: Accounting Act and Code of Criminal Procedure); we use the domain name part of your email when profiling (see the separate section at the bottom of the document). We share your email address with Cloud711 (processor), for the purpose of data storage and backup, i.e., storing our IT operations on their servers (legitimate interest: lowering the cost of operation and keeping the data safe); Microsoft (processor) for the purpose of facilitating communication, i.e., sending our own emails (legitimate interest in outsourcing the operation of email servers and protocols); CoolAccountants (processor) for the purpose of accounting, i.e., reviewing our financial records and keeping them in order (legal obligation: Accounting Act); FraudDetectors (processor) for the purpose of fraud detection (legitimate interest: not becoming a victim of fraud). We do not share your email address with recipients choosing their own purposes of processing (controllers). We store your email for as long as you're using our services, i.e., until you delete your account, PLUS THREE MONTHS. For the purposes required by the Receipts Act, Accounting Act, and the Code of Criminal Procedure, we store your email address for five years after your last transaction.

2. Your name and surname. You provide us with your name and surname when registering for the service and when making payments. We use your name and surname for the following purposes: account personalization, we associate it with your account, so that it appears whenever you log into the service (contractual necessity); issuing receipts, we place it on your order receipts (legal obligation: Receipts Act); email personalization, we use your name to personalize emails we send to you to open with a phrase to the effect of “Good Morning [Your Name]” (legitimate interest: to sustain a good relationship with customers); transaction processing, we use your name and surname when processing your payments, i.e., communicating with your Bank or ApplePay or PayPal (legal obligation: Receipts Act); tracking transaction history, we keep it as a part of your order history data in case it becomes necessary to reveal it to investigative authorities (legal obligation: Accounting Act and Code of Criminal Procedure); we use your name and surname to profile you (see the separate section at the bottom of the document). We share your name with our delivery persons (processors) for the

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purpose of order delivery, and they will be able to see it when delivering food to you but it will disappear from their app after the delivery (contractual necessity); with Cloud711 (processor), for the purpose of data storage and backup, i.e., storing our IT operations on their servers (legitimate interest: lowering the cost of operation and keeping the data safe); Microsoft (processor) for the purpose of facilitating communication, i.e., sending our own emails (legitimate interest in outsourcing the operation of email servers and protocols); CoolAccountants (processor) for the purpose of accounting, i.e., reviewing our financial records and keeping them in order (legal obligation: Accounting Act). We also share your name and surname with the payment service that you rely on, either ApplePay, PayPal, or the bank of your choice (processor) for the purpose of enabling your payments (legal obligation: Payments Act). We do not share your name and surname with any recipients choosing their own purposes of processing (controllers). We store your email for as long as you're using our services, i.e., until you delete your account, PLUS THREE MONTHS. For the purposes required by the Receipts Act, Payments Act, Accounting Act, and the Code of Criminal Procedure, we store your email address for five years after your last transaction.

3. Your phone number. You provide us with your phone number when registering for the service. We use your phone number for the following purposes: account security, when we detect someone logging into your account from a location or device different than usual we will send you a code to insert into the app to confirm it is you (legal obligation: the GDPR, the requirement to keep the account secure); delivery, we can initiate a call during the delivery process to facilitate finding you (contractual necessity); profiling (see the separate section at the bottom of the document). We share your phone number with Cloud711 (processor), for the purpose of data storage and backup, i.e., storing our IT operations on their servers (legitimate interest: lowering the cost of operation and keeping the data safe); we share your phone number with our delivery persons (processor) for the purpose of order delivery, to enable them to contact you if case they have trouble finding the address (contractual necessity). We store your phone number until you delete your account, PLUS THREE MONTHS.

4. The default delivery address. You provide us with the default delivery address. We use your default delivery address for the following purposes: delivery address suggestion, when you initiate an order we'll insert your default delivery address automatically into the order form so that you do not have to type it in every single time (consent); vendor suggestion, we suggest you ordering from vendors located close to you, for our delivery persons to be able to bring you the order; clients' location analytics, we keep track how many of our clients are located in a given town, district, or street, to be able to have a sufficient number of delivery persons working that area (contractual necessity); anonymization, we anonymize your default delivery address removing elements that identify one household, like the apartment number in case of a block of flats, or the street number in case of a detached house, to create non-personal data further used for analytics and purposes we don't have to disclose (legitimate interest: to derive value from data that is no longer personal); we use your default delivery address to profile you (see the separate section at the bottom of the document). We share your default delivery address the following entities: Cloud711 (processor), for the purpose of data storage and backup, i.e., storing our IT operations on their servers (legitimate interest: lowering the cost of

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operation and keeping the data safe); we share your default delivery address with vendors close to you (controller), to facilitate their own marketing (legitimate interest: building the relationship with vendors); we share your default delivery address with Facebook (controller), for the purpose of ad delivery, i.e. verifying the efficacy of their ads and sending you third party marketing (legitimate interest: to make profit of available data), and with Google (controller), for the purpose of ad delivery, i.e. verifying the efficacy of their ads and sending you third party marketing (legitimate interest: to make profit of available data). We store your default delivery address until you change it or until you delete your account, PLUS THREE MONTHS.

5. Each delivery address. You provide us with the delivery address every time you make an order. We use your delivery address for the following purposes: order delivery, we need to know where to deliver your order (contractual necessity); tracking transaction history, we keep it as a part of your order history data in case it becomes necessary to reveal it to investigative authorities (legal obligation: Accounting Act and Code of Criminal Procedure); anonymization, we anonymize your each delivery address removing elements that identify one household, like the apartment number in case of a block of flats, or the street number in case of a detached house, to create non-personal data further used for analytics and purposes we don't have to disclose (legitimate interest: to derive value from data that is no longer personal); profiling (see the separate section at the bottom of the document). We share your delivery address with the following entities: our delivery persons (processor), for the purpose of making the delivery (contractual necessity); vendors preparing the order (processor) for their own accounting purposes (legal obligation: Accounting Act); vendors close to you, we share each delivery address with vendors close to you (controller), to facilitate their own marketing (legitimate interest: building the relationship with vendors); we share your each delivery address with Facebook (controller) for the purpose of ad delivery, i.e. verifying the efficacy of their ads and sending you third party marketing (legitimate interest: to make profit of available data) and with Google, (controller), for the purpose of ad delivery, i.e. verifying the efficacy of their ads and sending you third party marketing (legitimate interest: to make profit of available data); Cloud711 (processor), for the purpose of data storage and backup, i.e., storing our IT operations on their servers (legitimate interest: lowering the cost of operation and keeping the data safe). We store each delivery address for two years after each delivery.

6. Details of your order (what you buy). You provide us with the details of your order. We use the details of your order for the following purposes: order processing, we communicate it to the vendor in charge of preparing it and to the delivery person in charge of delivering it (contractual necessity); order delivery, we need to know what we are delivering to you to count the weight and the volume of orders our delivery persons can carry (contractual necessity); issuing receipts, we use the details of your order to issue you receipts (legal obligation: to issue receipts, according to the Receipts Act); tracking transaction history, we keep it as a part of your order history data in case it becomes necessary to reveal it to investigative authorities (legal obligation: Accounting Act and Code of Criminal Procedure); recommendations personalization, we personalize the notifications you will get or the feed of our app so that the things similar to what you have ordered in the past appear higher or more often (legitimate interest: to make our service more satisfying to our users); personalization of own advertising, to select

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advertisements of our own services that we believe will be interesting to you based on your past orders (legitimate interest: to promote our services to our consumers); personalization of third-party advertising, we allow third-parties to show ads on our platform and we will use the details of your past orders to personalize those ads by matching what is advertised to your interests or interests of people who bought similar things (legitimate interest: to optimize the price of our services by subsidizing the cost with a revenue stream from third-party advertising); for profiling (see the separate section at the bottom of the document). We share the details of your order with the following entities: vendors preparing your order (processor) for the purpose of order preparation (contractual necessity); our delivery persons (processor) for the purpose of order delivery, as they should be aware what kind of order they are carrying; CoolAccountants (processor) for the purpose of accounting, i.e., reviewing our financial records and keeping them in order (legal obligation: Accounting Act); FraudDetectors (processor) for the purpose of fraud detection (legitimate interest: not becoming a victim of fraud); Cloud711 (processor), for the purpose of data storage and backup, i.e., storing our IT operations on their servers (legitimate interest: lowering the cost of operation and keeping the data safe); vendors close to you (controller), to facilitate their own marketing (legitimate interest: building the relationship with vendors); we share your order details with Facebook (controller) for the purpose of ad delivery, i.e. verifying the efficacy of their ads and sending you third party marketing (legitimate interest: to make profit of available data) and Google (controller) for the purpose of ad delivery, i.e. verifying the efficacy of their ads and sending you third party marketing (legitimate interest: to make profit of available data). We store the details of your order for two years after each order, with the exception of processing required by the Receipts Act, Accounting Act, and the Code of Criminal Procedure, where we store the details of your orders for five years after each order.

7. The price you pay. You provide us with the information about the price you’re agreeing to pay by accepting our offer. We use the information about the price you pay for the following purposes: to initiate payment, we need to communicate to the payment processor how much we are charging (contractual necessity); to issue the receipts (legal obligation: Receipts Act); to track transaction history, we keep it as a part of your order history data in case it becomes necessary to reveal it to investigative authorities (legal obligation: Accounting Act and Code of Criminal Procedure); price range estimation, to estimate the price range of products you’re interested in (legitimate interest: to optimize profits by engaging in price discrimination); to personalize our advertising, we match the price range of products you previously purchased to the ads we send you (legitimate interest: to market our services); to personalize third party advertising, we match the third party-ads we feature on our website with the price range of products you bought previously (legal basis: developing our own ad delivery systems); for profiling (see the separate section at the bottom of the document). We share information about the price you pay with the following entities: payment processor, i.e., your bank, PayPal, or Apple Pay (Processor), for the purpose of processing the payment (contractual necessity); we share the information about the price you pay with Facebook (controller) for the purpose of personalizing their own advertising (legal basis: to make profit of available data) and Google for the purpose of personalizing their own advertising (legal basis: to make profit of available data); with Cloud711 (processor), for the purpose of data storage and backup, i.e., storing our IT

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operations on their servers (legitimate interest: lowering the cost of operation and keeping the data safe). We store the details of your order for two years after each order, with the exception of processing required by the Receipts Act, Accounting Act, and the Code of Criminal Procedure, where we store the details of your orders for five years after each order.

8. Your payment method. You provide us with the information about the payment method you want to use. We use the information about your payment method for the following purposes: to save the default (consent); payment processing, we facilitate your communication with the payment processor (contractual necessity); to profile you (see the separate section at the bottom of the document). We share your payment method with your payment processor, i.e., your bank, Apple or PayPal (Processor) for the purpose of processing the payment (contractual necessity); Cloud711 (processor), for the purpose of data storage and backup, i.e., storing our IT operations on their servers (legitimate interest: lowering the cost of operation and keeping the data safe). We store the information about your payment methods for two years after each transaction and the default method for as long as you're using our services, i.e., until you delete your account, PLUS THREE MONTHS.

9. Your ratings of the orders: You provide us with the ratings of your orders. We use the ratings of your orders for the following purposes: recommendations personalization, we base the offers and suggestions we send you via email or list first in our app based on how you rated the vendors previously (legitimate interest: to make our service more useful to consumers); future recommendations for others, we use your ratings to choose offers and recommendations for other consumers (legitimate interest: to make our service more useful to consumers); feedback to our vendors, we use your ratings of past orders to prepare feedback to the vendors we cooperate with (legitimate interest: to sustain a good relationship with the vendors); to profile you (see the separate section at the bottom of the document). We share your order's ratings with the following entities: vendors (controller) for feedback, so that they can know what products were judged good and what suboptimal (legitimate interest: to sustain a good relationship with the vendors); we share rating of your orders with Facebook (controller), for ad personalization (legitimate interest: to make profit of available data) and Google, for ad personalization (legitimate interest: to make profit of available data); Cloud711 (processor), for the purpose of data storage and backup, i.e., storing our IT operations on their servers (legitimate interest: lowering the cost of operation and keeping the data safe). We store your ratings of the orders for as long as the vendors you rated continue to operate on our platform.

10. Your geolocation. We collect it from your device automatically, using GPS. We use your geolocation for the following purposes: delivery address suggestion, we suggest an address we believe you are at to streamline you making the order (consent); vendor suggestion, we suggest you ordering from vendors located close enough for our delivery persons to be able to bring you the order (contractual necessity); delivery, we track your location to see where exactly you find yourself, to facilitate the order delivery (legitimate interest: to increase efficiency and accuracy of our delivery persons); clients' location analytics, we use your geolocation to keep track how many of our clients are located in a given town, district, or street, to be able to have a sufficient number of delivery persons working that area (contractual necessity); anonymization, we

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anonymize information about your geolocation to strip it of any data that could link it to you, including by removing precise-location and information, to turn it into anonymous data which we use further for analytics and purposes we don't have to disclose (legitimate purpose: to derive value from data that is no longer personal); to profile you (see the separate section at the bottom of the document). We share your geolocation with our delivery persons (processor) for the purpose of order delivery, to help them find you (contractual necessity); we share your geolocation with vendors close to you (controller), to facilitate their own marketing (legitimate interest: building the relationship with vendors); we share your geolocation with Facebook (controller), for the purpose of ad delivery, i.e. verifying the efficacy of their ads and sending you third party marketing (legitimate interest: to make profit of available data) and Google (controller), for the purpose of ad delivery, i.e. verifying the efficacy of their ads and sending you third party marketing (legitimate interest: to make profit of available data). We store your geolocation info until you delete your account, PLUS THREE MONTHS.

ADDITIONAL SECTION: Profiling

We also engage in profiling. The goal of profiling is to find any statistical patterns than might become useful in optimizing any tasks and, for this reason, it is difficult to comprehensively specify in advance all possible data categories used for all possible purposes.

This said, we use the following categories of data for profiling you: domain name of your email address, your name and surname, your phone number (including the country code), your default delivery address, each address for delivery you order, details of your order (what you buy), the price you pay, your payment method, your ratings of past orders, your geolocation.

We use profiling for the following purposes: recommendations, we choose what to recommend you based on what people similar to you like; price discrimination, we try to make the price correspond to your budget; own marketing, we will choose the ads of our own products to show you based on what people similar to you like; third party marketing, we sometimes display ads of third parties and will show you those that are interesting for people similar to you.