

# DATA PROTECTION POLICY FOR THE ETHICS CHANNEL

In accordance with the provisions of Regulation (EU) 2016/679 of 27 April on the Protection of Natural Persons with regard to the Processing of their Personal Data (GDPR); Organic Law 3/2018 of 5 December on the Protection of Personal Data and the Guarantee of Digital Rights (LOPDGDD); and Law 2/2023 of 20 February on the Protection of Persons Reporting on Regulatory Violations and the Fight against Corruption (Law on the Protection of the Informant), as well as with the provisions of the other applicable data protection regulations, in this document we lay out our treatment of the personal data provided through the Ethics Channel.

The Ethics Channel has the necessary measures in place to guarantee and ensure the confidentiality of the informant's identity, and their protection, as well as any third party mentioned in the communication, preventing unauthorised persons from accessing information.

## 1. DATA CONTROLLER

Your personal data will be processed by:

Information	The Data Controller's information
Company	Glovoapp23, S.A. (hereinafter the "Controller")
Tax number (NIF)	A66362906
Postal address	Carrer Llull 108, 08005 (Barcelona) España
Contact for the Data Protection Officer (DPO)	<a href="mailto:gdpr@glovoapp.com">gdpr@glovoapp.com</a>

If your communication is related to any of the companies within the business group, the corresponding company will process your personal data as Controller. Glovoapp23, S.A. acting as Processor, will process them on behalf of the aforementioned company for some of the purposes indicated in the "PURPOSES" section. Updated information on the companies in the business group can be found in Annex I of this policy.

## 2. IDENTIFICATION OF THE ETHICS CHANNELS

The Controller has established the following preferred internal ethics channels:

Channel	Contact details
<i>In writing (via any electronic means provided for this purpose)</i>	
Web form	<a href="https://glovo.c-etico.es">glovo.c-etico.es</a>
Email	<a href="mailto:compliance@glovoapp.com">compliance@glovoapp.com</a>
<i>Verbally (via telephone or voice messaging system)</i>	

<b>In-person meeting</b>	<i>Only available in some countries upon verbal request, or through the written channels enabled.</i>
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In certain countries (such as EU countries), there is also the possibility of requesting a face-to-face meeting through any of the above channels. This will take place within seven (7) days of the date of the request for the face-to-face meeting.

The complaint can be made both anonymously and nominatively (providing the identity of the informant). However, it may be the case that the data identifying the informant is essential in order to continue with the investigation of the complaint, and failure to provide such information may prevent the continuation of the investigation.

**External information channels:**

You may also lodge a complaint with the competent whistleblower protection authorities, either directly or by having previously communicated the complaint through any of the channels authorised by the Controller, if you believe that the complaint filed cannot be dealt with effectively, or if you believe there is a risk of retaliation. You can contact, any of the following authorities, among others:

**3. PURPOSES**

Depending on the processing performed, personal data may be processed for the following purposes:

<b>Purpose</b>	<b>Description of the purpose and legal basis</b>
<b>Resolve queries</b>	<p>We will process the data in order to respond to queries regarding the operation and management of the Ethics Channel and/or Compliance Model.</p> <p><b>Legal basis:</b> legitimate interest</p>
<b>Receipt and processing of complaints</b>	<p>We will process the data for the purpose of receiving complaints and deciding whether or not to initiate an investigation into the complaints received. We will also process it for the purpose of conducting an investigation into the reported facts, protecting the informant from retaliation, taking, if necessary, appropriate corrective measures and, if necessary, initiating legal action against the reported persons and/or third parties.</p> <p>In the event that communication of the complaint is done orally (by telephone, voicemail or face-to-face), we are required to document the complaint in either of the following ways, which you are free to choose between:</p> <p>(a) by recording the conversation in a secure, durable and accessible format; or</p> <p>b) through a complete and accurate transcript of the conversation conducted by the staff member responsible for handling it.</p> <p>If the conversation is transcribed, you will have the opportunity to check and rectify the transcript of the conversation and then accept it by signing it.</p> <p><b>Legal basis:</b> legal obligation (obligated entities) or legitimate interest (unobligated entities)</p>
<b>Prove the proper functioning of the Ethics Channel and Compliance Model</b>	<p>We may retain your data to demonstrate the proper functioning of our Ethics Channel, our Compliance Model and/or retain evidence for the defense of the Company.</p>

<b>and preserve evidence for the Company's defense</b>	<b>Legal basis:</b> legal obligation (obligated entities) or legitimate interest (unobligated entities)
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#### 4. TYPE OF PERSONAL DATA THAT MAY BE PROCESSED

We will process the following personal data, depending on the case:

Type of stakeholders	Categories of data
<b>Consultant</b>	Consultant's identification data, contact data, employment data, economic data and other data associated with the consultation, evidence.
<b>Nominative informant</b>	Identification data, contact data, details of the facts considered relevant, evidence and voice.
<b>Anonymous informant</b> <i>(The informant may provide the following data or none of them)</i>	Pseudonym, contact data, evidence, voice.
<b>Confidential informant</b> <i>(The informant does not want the Controller to know their identity. In this case, the identifying data provided will be managed only by the external manager of the Ethics Channel)</i>	Identification data, contact data, data associated with the reported conduct, evidence, voice.
<b>Accused party</b>	Identification data, data associated with the reported conduct, evidence.
<b>Witness</b>	Identification data, contact data, data associated with the reported conduct, evidence.
<b>Third parties</b>	Identification data, contact data, data associated with the reported conduct, evidence.

While processing the communication sent by you, you may be asked to clarify the information communicated or to provide additional information.

#### 5. LEGAL BASIS

We will process your data according to one or several of the following legitimate bases set out above:

Legal basis	Description
Execution of a contract	We will process your data if this is necessary for the execution of a contract, to fulfill the obligations set out in the contract.
Legal obligation	We may also process your personal data if we are required to do so by law.
Public interest	We may also need to process your data to perform a task carried out in the public interest, or to exercise official powers entrusted to us.
Legitimate interest	We may process your data where necessary for the satisfaction of overriding legitimate interests we have as Controller.

	For more information about the weighting of legitimate interest in each case, contact the DPO.
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## 6. DATA COMMUNICATION

In general, your personal data will be confidential and will not be disclosed to the persons to whom the information relates, or to third parties.

However, your personal data may be communicated to those external service providers that we have contracted to receive the information sent through this channel, and, where appropriate, for the management and conduct of the necessary investigations. These will process the data to fulfill their role as Processor and under no circumstances will process the data for their own purposes.

They may also be communicated to the Security Forces and Corps, Judges or Courts, as well as any other competent body if requested in compliance with current legislation.

Where there are indications that the reported acts may constitute an offence, there is an obligation to immediately notify the Public Prosecutor of the facts. If the facts reported may affect the financial interests of the European Union, they should be referred to the European Public Prosecutor's Office.

## 7. INTERNATIONAL DATA TRANSFERS

If the Controller has international suppliers or is part of a group of companies, your personal data may be processed outside the European Union or the European Economic Area.

In this case, the Controller shall ensure that such data processing is always protected with appropriate safeguards, which may include:

- EU-approved Standard Clauses: these are contracts approved by the European regulator which provide sufficient guarantees to ensure that the processing complies with the requirements established by the European Data Protection Regulation.
- Third-party certifications: framework agreement between the EU and another state that establishes a standardised framework for data processing in line with the requirements of the European Data Protection Regulation.

## 8. DURATION OF THE PROCESSING

- **Queries**

In the case of queries, personal data will be kept for the time necessary to resolve the doubt or question raised and to provide the interested party with a reply. Once the corresponding retention period has expired, the data may be duly blocked and retained in order to prove compliance with the Controller's Compliance Model and, where appropriate, to comply with legal obligations. After this period, the data will be permanently deleted.

- **Reports**

Personal data will only be stored in the Ethics Channel for the time necessary to decide on the appropriateness of beginning an investigation into the facts reported. In all cases, this will be a maximum period of three (3) months from the date of sending the acknowledgement of receipt or, if we have not acknowledged receipt, a maximum period of three (3) months from seven (7) days from the date the complaint was sent.

If, once three (3) months have elapsed since the receipt of the complaint, no investigation procedures have been initiated, the Ethics Channel data will be deleted, unless it is kept as evidence of the proper functioning of the System, in which case it will be anonymised, without the obligation to block laid out in the LOPDGDD being applicable.

Complaints admitted for processing will be kept in the Internal Information System for the duration of the investigation and, in general, for a maximum period of ten (10) years. However, we may extend this maximum storage period in the following cases:

1. To prove the effective functioning of our Compliance Model, in accordance with the provisions of article 31 bis of the Criminal Code, taking into account the statute of limitations for crimes, in accordance with the provisions of the Criminal Code.
2. When the reported act constitutes a crime or administrative offence, during the statute of limitations period for crimes established in the Penal Code and, in the case of administrative sanctions, according to the period established in the laws applicable to each case.

Once the corresponding storage period is over, they will be permanently destroyed.

We will also immediately delete personal data in certain cases, without the obligation to block them:

- If it is proved that the information, or part thereof, provided is untrue, unless the lack of truthfulness constitutes a criminal offence, in which case the data shall be kept for the time necessary for the legal proceedings.
- If personal data that is not necessary for knowledge and investigation of actions or omissions within the scope of this complaint channel, including special categories of data, have been disclosed. In the latter case, it will be immediately deleted, without registration and processing.

## 9. EXERCISE OF RIGHTS

The owner of the personal data may at any time exercise their data protection rights (including withdrawing the consent granted) of access, rectification, deletion, opposition, portability and limitation, free of charge by writing to [gdpr@glovoapp.com](mailto:gdpr@glovoapp.com) or by contacting our privacy portal via <https://privacyportal-de.onetrust.com/webform/823e95df-5300-421a-bd72-0c9e0180184f/ff436245-5e5d-44f9-8463-eb48c2052eb5>.

If strictly necessary, we may request a document proving your identity in order to execute your request to exercise of your rights.

However, if the person under investigation exercises the right to object to the processing of their personal data, it will be presumed that, unless there is proof to the contrary, there are compelling legitimate grounds for continuing such processing of their personal data.

If you have any questions or complaints about how we process your personal data, you can contact our DPO at the contact address indicated in the “**Controller**” section.

Additionally, you can file a claim with the Spanish Data Protection Agency ([www.aepd.es](http://www.aepd.es)) if you feel that we have not properly addressed your rights.

## 10. ADDITIONAL INFORMATION

If you have any further questions about how we treat your personal data, you can contact our DPO, at [gdpr@glovoapp.com](mailto:gdpr@glovoapp.com).

*Last updated on: 24 July 2023*

**ANNEX I**

COUNTRY	ENTITY	Tax number (NIF)	POSTAL ADDRESS
Spain	Glovoapp23 S.A	A66362906	Carrer Llull 108 (08005) Barcelona, España
	Glovoapp EMEA, S.L.U	B67523159	Carrer Llull 108 (08005) Barcelona, España
	Glovoapp Spain Platform S.L.U.	B67282871	Carrer Llull 108 (08005) Barcelona, España
	Glovoapp B2B, S.L.U.	B67522870	Carrer Llull 108 (08005) Barcelona, España
	Glovoapp Groceries, S.L.U.	B67522904	Carrer Llull 108 (08005) Barcelona, España
	Virtual Brand Solutions, S.L.U.	B67464248	Carrer Llull 108 (08005) Barcelona, España
	Homeria Open Solutions, S.L.	B10379881	10004-Cáceres, Parque Científico y Tecnológico de Extremadura, Campus Universitario, Avenida de las Ciencias, 2,
	Worldcoo, S.L.	B65855611	Via Augusta 13-15, room 603, (08006), Barcelona, Spain
Andorra	Glovoapp SLU	L-716443-L	Ingeni coworking, Passatge d'Europa, 1, 4th floor, AD500 Andorra la Vella, Andorra
Portugal	Glovo Portugal Unipessoal LDA	515642428	Rua Alexandre Herculano, 50, 4.º, Lisboa District: Lisbon Concelho: Lisbon Freguesia: Santo António 1250 048 LISBON
	FORTE - NEGÓCIOS ONLINE, S.A.	514195843	Via do Castelo do Queijo, no 395, loja 22 e 23 District: Porto Concelho: Porto Freguesia: Aldoar, Foz do Douro e Nevogilde 4100 429 Porto
	Glovo Infrastructure Portugal, LDA.	516752049	Rua Alexandre Herculano, 50, 4.º, Lisboa District: Lisbon Concelho: Lisbon Freguesia: Santo António 1250 048 LISBON
Italy	Foodinho S.R.L.	9080990964	VIA GIOVANNI BATTISTA PIRELLI 31 CAP 20124 MILANO (MI)
	Glovo Infrastructure Services Italy S.R.L	10940380966	VIA GIOVANNI BATTISTA PIRELLI 31 CAP 20124 MILANO (MI)
	Social Food S.R.L.	6227970826	VIA CATANIA 166/A CAP 90141 PALERMO (PA)
Poland	Restaurant Partner Polska sp. z o.o.	7252012779	Piotrkowska 276, 90-361 Łódź, Poland

	Glovo Infrastructure Poland sp. z o.o.	7292741734	Piotrkowska 276, 90-361 Łódź, Poland
Romania	GlovoappRo, S.R.L.	39053728	Calea Serban Voda, nr 206, Cladirea U-Center, Etaj 4, Sector 4, Bucuresti
	Glovo Infrastructure Services RO S.R.L.	44193418	București, Sector 4, Calea Serban Voda, Nr. 206, Cladirea U-Center, Etaj 4, Sala 10
Moldova	GlovoAppMOL SRL	1020600034411	Vlaicu Pircalab St 77- Chișinău 2012, Moldova
Croatia	Glovoapp Technology d.o.o. (HR)	48879371584	Radnicka cesta 52 10000, Zagreb, Croatia
	Glovo Infrastructure d.o.o. (HR)	26523453006	Radnicka cesta 52 10000, Zagreb, Croatia
Bulgaria	Glovoapp Bulgaria, EOOD	203039843	Bulgaria, Sofia, Industrial Area Hladilnika 1407, No.2, Srebarna Str, Mobi Art Building, Floor 2
Slovenia	Glovoapp SI, d.o.o.	SI 82705844	1000 Ljubljana, cesta Ljubljanske brigade 21,
Ukraine	Glovoapp Ukraine LLC	425555226591	Ukraine, 01011, Kiev, Panasa Myrnoho street, Building 11, Office 2/21
	GLOVOPROM Ukraine LLC	435364026597	Ukraine, 01011, Kiev, Panasa Myrnoho street, Building. 11, Office 2/21
Kazakhstan	Glovoapp Kazakhstan LLP	190640018883	Kazakhstan, Almaty city, Bostandyk district, Al-Farabi Avenue, house 17/1, PFC "Nurly-Tau", block 5B, office No. 18, postal code 050059
	Glovo Infrastruktura Kazakhstan LLP	210340035928	Kazakhstan, Almaty city, 050040, Satpaeva Street 30A, Office 45
Georgia	Glovoapp Georgia Llc	402099475	Georgia, Tbilisi, Didube District, D. Agmashenebeli Avenue N129a, Store N4
	Glovo Georgia Infrastructure LLC	402177880	Georgia, Tbilisi, Didube district, Davit Agmashenebeli, Avenue N 129a, shop N4
Armenia	Glovo LLC	52677306	V. SARGSYAN / 26/1 CENTER 0010 YEREVAN ARMENIA
Kyrgyztan	GLOVO KG LLC	2109202010145	Erkindik Ave. 64B, Office 18, Pervomaysky District, Bishkek, 720040
Serbia	Glovoapp Technology d.o.o. Beograd-Stari Grad	111507569	Žorža Klemensoa 19, 11000 Belgrade, Serbia
	Glovoapp Technology doo Beograd Ogranak NS Novi Sad	111507569	Kolo Srpskih Sestara 13, Novi Sad
	Glovoapp Technology doo Beograd Ogranak Glover Centar	111507569	Stjepana Ljubiše 3, Belgrade (Zvezdara)
	Glovoapp Infrastructure RSB Beograd-Stari Grad	112718703	Žorža Klemensoa 19, 11000 Belgrade, Serbia



	Plotun, d.o.o., Kruševac	105569457	Obilićeva 33, Kruševac, Serbia
	Plotun doo Krusevac Ogranak Beograd	105569457	Makenzijeva 57, sprat 3, Belgrade ( Vračar )
	Plotun doo Krusevac Ogranak	105569457	Ruzveltova, (Ulaz iz Stjepana Ljubiše) 48 ,Belgrade (Zvezdara)
Montenegro	Donesi d.o.o. Podgorica (ME)	2915456	Rimski Trg br 4., Podgorica, 8100 Montenegro
	Glovo Montenegro d.o.o.	3351475	Rimski Trg br 4., Podgorica, 8100 Montenegro
Bosnia	Glovoapp d.o.o. Sarajevo	4202880430005	ul. Branilaca Sarajeva 17,
	Glovoapp Društvo sa ogranicenim odgovornoscu, Podružnica, Banja Luka (Branch, Sarajevo, Bosnia)	4202880430005	Sime Solaje, 1A, Banja Luka, Republic of Srpska, Bosnia and Herzegovina
	Donesi d.o.o. Banja Luka (B&H)	4403528640003	Banja Luka, at Petra Kocica 3, 78000, Banja Luka, Bosnia
	Donesi d.o.o Banja Luka- Poslovna jedinica Sarajevo	4403528640003	Branilaca Sarajeva 17
Morocco	Glovoapp Morocco Sarl	2086928000050	Rue Soumaya Résidence Shehrazade 3, 5ème étage, n° 22 Palmiers 20340 - Casablanca.
	Glovo Infrastructure Services Morocco	2829626000014	Rue Soumaya Résidence Shehrazade 3, 5ème étage, n° 22 Palmiers 20340 - Casablanca.
Kenya	GlovoApp Kenya LLC	P051739866F	Westcom Point, Mahiga Mairu Avenue, 2nd Floor, P.O. Box 13423-00800, Westlands
	GLOVO INFRASTRUCTURE SERVICES KENYA LTD	P052013881Z	Westcom Point, Mahiga Mairu Avenue, 2nd Floor, P.O. Box 13423-00800, Westlands
Ivory Coast	GLOVOAPP COTE D'IVOIRE SARL	53703324719	Rue du 7 décembre, Marcory Zone 4C Sud, Lot 76737, BP 654, Abidjan 27, Côte d'Ivoire
Uganda	Glovo Uganda SMC Limited	1017265563	4th Floor, DFCU Towers, 26 Kyadondo Road, Nakasero, P O Box 1520, Kampala, Uganda
Ghana	Glovoapp Ghana Limited Company	C0060036362	Impact Hub Accra F 393/4 Otswe, Osu, Accra, Ghana
Nigeria	Glovoapp Nigeria Limited	23916307-0001	4th Floor, Adamawa Plaza Plot 1099,1st Avenue Off Shehu Shagari Way, Central Business District FCT, Abuja, NIGERIA
Tunisia	Glovoapp Tunisia SUARL	1739051W	Complexe Vital Cube - Bloc E, N° 2 & 3 Rue de L'île de Tasmanie Berges du Lac 2, Tunis - 1053Mat. Tax: 1739051W
Peru	Infrastructures Peru SAC	RUC 20602602941	Avenida Benavides 3890, Santiago de Surco, Lima