

Cookpad – Employee Privacy Policy

At Cookpad, we value the privacy of those who provide personal information to us.

This privacy policy describes what personal information we collect about our European employees, potential employees and other personnel who work for us, how we use that personal information and otherwise process it, the basis upon which we process it, with whom it is shared, and how it is stored. This policy also describes other important topics relating to information privacy.

When we refer to “Cookpad”, “us”, “we” or “our”, we mean the Cookpad group company that is responsible for any personal information collected about you; that will predominantly be the group company you work for, or which you are applying to work for. Our other group companies may also process your personal information for more limited purposes. Details of each of our group companies are set out below.

United Kingdom: Cookpad Limited (company number 09798653), a limited company registered at 1-3 Broad Plain, Bristol, England BS2 0JP, and registered with the UK Information Commissioner’s Office (register number ZA164405)

Spain: Cookpad Spain, S.L. a limited liability company registered at Camino del Faro nº2, bungalow 12, Residencia Cabo de las Huerta

Japan: Cookpad Inc., a corporation registered at 4-20-3 Ebisu, Shibuya-ku, Tokyo, Japan

India: Cucumbertown Software Labs Private Limited, a private limited company registered in Site No. 735, 15th A Main 22nd Cross, Club Road, HSR Layout Bangalore Bangalore KA 560102 IN

Indonesia: PT. COOKPAD DIGITAL INDONESIA, a limited liability company registered at MENTENG SQUARE SOHO TOWER A LT.22 NO.15 JL MATRAMAN NO. 30 E, JAKARTA PUSAT

Lebanon: Cookpad MENA S.A.L. a joint stock company registered at Piccadilly Centre, Hamra Street, 4th Floor, Office Number 407, Beirut, Lebanon

Russia: Ovkuse ru. a limited liability company registered at the Russian Federation, the Republic of Bashkortostan, 453103, the city of Sterlitamak, street Volochaevskaya, 20, apart. 41.

Hungary: HC Online kft. a limited liability company registered at Hungary, 1012 Budapest, Várfok utca 8; half floor; door 6

Taiwan: Cookpad (Taiwan) Co., Ltd. a limited liability company registered at No.29, Ln. 125, Shezi St., Shilin Dist., Taipei City 111, Taiwan
United States: Cookpad Inc. (US), a corporation registered at 431 Burgess Dr, Menlo Park, CA 94025-3408

**Please read this privacy policy carefully to understand how we handle your personal information. **

1. Information collection

1.1 We may collect and use any of the following information about you and we refer to this as “personal information” throughout this policy:

- (a) Your personal details:
 - (i) first name, maiden name and surname;
 - (ii) birth date;
 - (iii) home address;
 - (iv) proof of identification and address;
 - (v) home telephone number;
 - (vi) personal email address;
 - (vii) gender;
 - (viii) marital status;
 - (ix) race/ethnicity (if you choose to provide it); and
 - (x) religious beliefs (if you choose to provide it).
- (b) Your next of kin or emergency contact details.
- (c) Compensation/employment information:

- (i) current/former titles and positions held with us (and information about that position, including how long in position, supervisor, location of position, employee identification number, promotions, training records, overall work history, disciplinary actions, grievances, retirement eligibility, transfers);
 - (ii) identification search results, including employment searches, directorship searches, bankruptcy searches, media searches and criminal record checks;
 - (iii) current and historic compensation with Cookpad (base salary, bonus, pension contributions);
 - (iv) work contact information (phone number, postal address, mailing address, email address);
 - (v) performance reviews and information; conduct and capability information;
 - (vi) work place accident information, sickness absence information and medical or health information (relevant to your employment and/or provided by you to Cookpad, for example, medical assessments and occupational health reports);
 - (vii) work hours (overtime and shift work, hours worked and department standard hours);
 - (viii) previous employment references; and
 - (ix) travel bookings and other expense claims, records and information.
- (d) Payroll data:
 - (i) bank details;
 - (ii) working time records;
 - (iii) current compensation;
 - (iv) tax information; and
 - (v) IDs related to payroll processing.

- (e) System and application access data: information required to access company systems and applications (such as system ID).
- (f) Talent management/resume/CV information: details contained in an application and resume/CV or otherwise provided to us, including previous employment background, professional qualifications and membership, references, career development and skills analysis, training, departmental changes, performance and calibration details.
- (g) Management records: details of any shares of common stock or directorships that you may hold.
- (h) CCTV footage.

1.2 We do not request or gather any information regarding political opinions, philosophical belief, trade union membership or sexual orientation.

1.3 If you share personal information with us which relates to other people (for example, former employers or your next of kin), you will need to check with that person that they are happy for you to share it with us, and for us to use it in accordance with this privacy policy.

2. Use of information

2.1 We collect, use and store your personal information for the following reasons:

- (a) to operate, support and centralise human resources administration and management (including but not limited to recruitment, payroll administration, employee administration, learning management, performance management and review, data storage, expense reporting and benefits management);
- (b) health and safety records and management;
- (c) confirming information on resumes, CVs and covering letters, providing reference letters and performance reference checks;
- (d) staff management and promotions;
- (e) equal opportunities monitoring;
- (f) provision of staff information to customers and agencies in the course of the provision of our services;

- (g) CCTV monitoring and other security of company facilities;
- (h) ensuring adequate insurance coverage for our business;
- (i) compliance with any procedures, laws and regulations which apply to us;
and
- (j) establishing, exercising or defending our legal rights.

2.2 We will only process your personal information for the specific purposes listed above or for any other purposes specifically permitted by law. If we wish to process your personal information for any other purpose, we will update this privacy policy in accordance with section 10.

2.3 We will only process your personal information to the extent that it is necessary for the specific purposes listed above.

3. Monitoring

3.1 We reserve the right to monitor, audit, copy, store or delete any network traffic over our systems. This includes a right to retrieve or access the contents of messages, inboxes or to undertake check searches of our e-mail systems for the purposes of monitoring, investigating wrongful acts or to comply with any of our legal or regulatory obligations.

3.2 All monitoring activities will be undertaken in accordance with the laws that apply to us.

4. Legal bases for use of your personal information

4.1 We need to have legal bases for using your personal information for the purposes set out in this privacy policy. We consider that our legal bases are as follows:

- (a) our use of your personal information is necessary for the performance of our obligations under our contract with you (for example, to pay you or to confer a benefit under the terms of an employment contract); or
- (b) our use of your personal information is necessary for complying with our legal obligations, particularly as your employer (or prospective employer) (for example, providing your personal information to HMRC); or

- (c) where our use of your personal information is not necessary for the performance of our contractual obligations, or compliance with our legal obligations, it is necessary for the purposes of our legitimate interests or the legitimate interests of a third party (for example, to enable us to centralise our HR systems and to use dedicated third party systems (such as Workday), to ensure the reliability of our employees or to maintain adequate personnel records).

4.2 Where we are relying on our legitimate interests or the legitimate interests of a third party, we have explained, in the relevant parts of this privacy policy, what those legitimate interests are.

4.3 Where we collect and process more sensitive categories of personal information, for example, information health assessment information, racial/ethnic origin or religious beliefs, we will only process such information:

- (a) where we need to in order to comply with our legal obligations as an employer or to exercise specific rights that we have as an employer; or
- (b) where you have given us your consent.

4.4 If we have asked for your consent to collect and use certain types of personal information, you may withdraw your consent at any time, by contacting the Head of HR.

5. Disclosure of personal information

5.1 Your personal information may be shared with any company that is a member of our group, which includes our ultimate parent company based in Japan, where it is in our legitimate interests to do so for internal administrative purposes. Access to your personal information is limited to those employees who need to know the personal information, and may include your managers and their designees, as well as employees in the human resources, corporate services, legal, information technology, and finance departments.

5.2 We will share your personal information with the following categories of third parties:

- (a) other parties such as legal and regulatory authorities, accountants, auditors, lawyers and other outside professional advisors; and

- (b) companies that provide products and services to us, such as:
 - (i) payroll and benefits providers;
 - (ii) pension providers;
 - (iii) insurance companies, including those providing medical insurance and group income protection;
 - (iv) human resources services, such as pre-employment checks and credit checks;
 - (v) information technology systems suppliers and support, including providers of our HR systems (such as Workday), email archiving, back-up and disaster recovery and cyber security services.

5.3 Some of these companies may use your data in countries which are outside of the European Economic Area. Please see section 7 below.

5.4 We will also disclose your personal information to third parties:

- (a) if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
- (b) if Cookpad or substantially all of its assets are acquired by a third party, in which case personal information held by Cookpad will be one of the transferred assets;
- (c) if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
- (d) to enforce our contract with you, to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- (e) to protect the rights, property or safety of Cookpad, our employees or other persons.

5.5 Any third parties with whom we share your personal information are limited (by law and by contract) in their ability to use your personal information for the specific purposes identified by us. We will always ensure that any third parties with whom

we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws.

5.6 Save as expressly detailed above, we will never share, sell or rent any of your personal information to any third party without notifying you and/or obtaining your consent. Where you have given your consent for us to use your information in a particular way, but later change your mind, you should contact us and we will stop doing so.

6. Retention of personal information

6.1 Cookpad collects and maintains personal information on current, former and prospective employees for legitimate corporate business purposes, such as processing payroll, collecting resumes to fill vacant positions, and maintaining accurate benefits records.

6.2 We keep your personal information for no longer than necessary for the purposes for which the personal information is used or otherwise processed. The length of time we retain personal information depends on the purposes for which we collect and use it and / or as required to comply with applicable laws. For example, in the UK, payroll and wage records must be kept for six years.

6.3 We currently store personal information for the following periods of time:

- (a) Applicants applying for a role with us who are not ultimately employed will have their personal information deleted after a period of two years. During that two year period, we may use your information to align your skills and experience to potential opportunities with us, and to contact you to determine whether or not you are interested in applying.
- (b) If you are an employee, consultant or contingent worker, your personal details, next of kin, compensation/employment information, payroll data, system and application access data will be retained for up to six years after your employment is terminated.
- (c) If you are an employee of the company, then your talent management/resume/CV information: details contained in an application and resume/CV or otherwise provided to us, including previous employment background, professional qualifications and membership, references, career development and skills analysis, training, departmental

changes, performance and calibration details will be retained for six years after your employment is terminated, with the exception of formal capability/misconduct information which will be removed from our systems within the agreed timeframe.

- (d) Management records: details of any shares of common stock or directorships that you may hold will also be retained for up to six years after your employment is terminated.
- (e) CCTV footage will be retained on a rolling basis for thirty days.

7. Your rights

7.1 You have certain rights in relation to your personal information. If you would like further information in relation to these or would like to exercise any one of them, please contact the Head of HR. You have the right to request that we:

- (a) provide you with a copy of any personal information which we hold about you;
- (b) update any of your personal information which is out of date or incorrect;
- (c) delete any personal information which we hold about you;
- (d) restrict the way that we process your personal information;
- (e) provide your personal information to a third party provider of services; or
- (f) consider any valid objections which you have to our use of your personal information.

We will consider all such requests and provide our response within the time period state by applicable law. Please note, however, that certain personal information may be exempt from such requests in certain circumstances, which may include if Cookpad needs to keep processing your personal information for Cookpad's legitimate interests or to comply with a legal obligation. When you make a request, we may ask you to provide us with some further information to allow us to confirm your identity.

7.2 If you have any questions or concerns about our use of your personal information, please contact your local human resources representative.

8. Transfers of information

8.1 Personal information may be processed by staff operating outside the EEA working for us, other members of our group or third party data processors for the purposes mentioned in section 2.

8.2 If we provide any personal information about you to any such non-EEA members of our group or third party data processors, we will take appropriate measures to ensure members of our group and our service providers protect your personal information adequately in accordance with this Privacy Policy. These measures include:

- (a) in the case of US based service providers, entering into European Commission approved standard contractual arrangements with them, or ensuring they have signed up to the EU-US Privacy Shield (see further <https://www.privacyshield.gov/welcome>); or
- (b) in the case of our group companies or service providers based in other countries outside the UK or EEA (including Hong Kong), ensuring that they are based in countries which have been deemed, by the European Commission, to be adequate, or entering into European Commission approved standard contractual arrangements with them.

8.3 Further details on the steps we take to protect your personal information, in these cases is available from us on request by contacting us by email at dpo@cookpad.com at any time.

9. Security

9.1 Cookpad is committed to protecting personal information from loss, misuse, disclosure, alteration, unauthorised access and destruction and takes all reasonable precautions to safeguard the confidentiality of personal information. Although we make every effort to protect the personal information which you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to us over the internet, and that any such transmission is at your own risk. Once we have received your personal

information, we will use strict procedures and security features to prevent unauthorised access.

9.2 Where we have given you (or where you have chosen) a password which enables you to access any account with us, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

10. Third party websites

You may, from time to time, during your employment, access links to or other websites operated by third parties (e.g. training providers, industry news sources and bulletins). Please note that this privacy policy only applies to the personal information that we collect from or about you and we cannot be responsible for personal information collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third party websites or third party terms and conditions or policies.

11. Changes to our privacy policy

This privacy policy does not form part of any employee's contract of employment and we may amend it from time to time. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

12. Further questions or making a complaint

12.1 If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact dpo@cookpad.com. We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information

12.2 You may also make a complaint to the UK Information Commissioner's Office (<https://ico.org.uk/>), the UK's data protection supervisory authority. Alternatively, you may seek a remedy through local courts if you believe your rights have been

breached. The practices described in this privacy policy statement are current personal information protection policies, as of August 2017.