

Applicant Privacy Notice (United Kingdom)

Last Updated: January 22, 2025

This Applicant Privacy Notice (“**Notice**”) describes how Olo Inc. (“**Olo**,” “**we**” and “**us**”) collect, use and share personal data from job applicants at Olo (collectively, “**you**” and “**your**”), including when you access or use our application portals, career website or other recruitment channels (collectively, “**Application Sites**”). This Notice also explains how to contact us regarding our privacy practices and the rights and choices you have related to your personal data.

We recommend that you read this Notice in full to ensure that you are informed about our privacy practices. However, if you want to skip to a particular section of this Notice, please refer to the table of contents below.

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Collection of Your Personal Data

As part of the recruitment, application and hiring processes, we collect personal data about you. Sometimes we collect this personal data directly from you. Other times we collect personal data from third parties and/or automatically through your use of our Application Sites.

Personal Data We Collect Directly from You

We collect personal data directly from you in different ways. For example, we collect personal data directly from you when you fill out an application, submit your resume or share information during an interview. Subject to applicable law, we collect the following personal data from you:

- *Basic Identifying Information.* This includes your name, signature, pronouns, social media or other website handles or similar identifiers.
- *Contact Information.* This includes your email address, telephone number and current location.
- *Work Eligibility Information.* This includes visa status and eligibility to work in the United Kingdom.
- *Employment History.* This includes your resume, Curriculum Vitae, work history, professional background, professional memberships, skills and qualifications.
- *Education Information.* This includes your education history, academic degrees, certifications and licenses.
- *References.* This includes work and personal references that you provide.
- *Compensation Information.* This includes salary and other compensation information.
- *Competency Assessments.* This includes assessments regarding your qualifications for the role, such as skills assessments.
- *Language Skills.*
- *Disability Information.* This includes disability or medical information that you choose to share with us so that we may provide accommodations for the interview and hiring process.
- *Other Information.* This includes any other information you voluntarily provide to us in connection with your application, including information that you provide through the Application Sites, during an interview or as part of the application and hiring processes.

You provide this information voluntarily, and you determine whether and what information to provide us. We will indicate if certain information is required to assess your application. If you do not provide the required information, we may have only a limited ability to evaluate you as a candidate and we may not be able to consider you for the opportunity.

Personal Data We Collect from Other Sources

We collect personal data about you from other sources, to the extent permitted by applicable law, in connection with the recruitment, application and hiring processes. This may include:

- *Background Check Information.* Where permitted or required by law, third parties, such as background check providers and identity verification companies, provide your credit history, criminal records, your information associated with social media platforms or professional networking sites and other information revealed from the Employer of Record.
- *Contact Information, Employment History and Education Information.* We may collect contact information, employment history and education information (as described above) from websites or social media (e.g., LinkedIn), from your references, from job boards and from recruiters and employment search firms. For example, if you register to be contacted by prospective employers on another website, the website may provide your data to us.
- *Other Information.* Other individuals may give us personal data about you. For example, if a current Olo employee thinks you may be interested in a job at Olo, they may provide us your contact details. Or if we contact your references, they may provide personal data about you. Throughout the recruitment, application and hiring processes, we may supplement your personal data in connection with the assessment of your application. For example, we may record the views of those considering your application about your suitability for the role which you applied and retain interview notes.

Personal Information We Collect Automatically

As you navigate through our Application Sites, we use cookies and other technologies to automatically collect information about your computer and your use of our Application Sites. The information we collect includes IP address; internet provider, operating system and browser used; domain names of the computers you use to visit our Application Sites; viewed webpages; links that are clicked; type of device (such as laptop or smart phone); log files; URIs (Uniform Resource Identifiers) of the resources requested; the time of the request; the method used to submit the request to the server; the size of the file obtained in reply; the numerical status code of the server reply (successful, error, etc.); emails we send that you open, forward or click through to our websites; and other parameters concerning your operating system and computer environment and/or device cookie settings and other device details, such as MAC address.

Cookies

We use cookies, and allow certain third parties to place cookies on the Application Sites, in order to provide the Application Sites, gather information about your usage patterns when you navigate the Application Sites in order to enhance your experience and to understand usage patterns to improve our Application Sites. Cookies on the Application Sites are divided into the below categories:

- *Necessary Cookies.* These cookies are necessary for the Application Sites to function and cannot be switched off. You can set your browser to block or alert about these cookies but some parts of the Application Sites will not work.
- *Functional Cookies.* These cookies enable the Application Sites to provide enhanced functionality. They may be set by us or third-party providers whose services we have added to our webpages. If you do not allow these cookies then some or all of the Application Sites may not function properly.
- *Performance Cookies.* These cookies allow us to count visits and traffic sources so we can measure and improve our performance of the Application Sites. They help us to know which pages are the most and least popular and to see how visitors move around the site. If you do not allow these cookies, we will not know when you have visited the site and will not be able to monitor its performance.

When you first visit the Application Sites, you will be asked for your consent to the use of any cookies which are not strictly necessary.

Use of Your Personal Data and Lawful Basis for Processing

We collect and use your personal data for a variety of reasons linked to the recruitment, application and hiring processes. However, we can only collect and use this data if we have a valid legal basis for doing so.

We have set out below the reasons why we collect and use your personal data and mapped these against the legal bases that allow us to do so.

Processing Purposes	Legal Bases
Administering and processing your application, including assessing your eligibility to work in the identified location	<ul style="list-style-type: none">• Compliance with legal obligations• Legitimate interests• Necessary for performing a contract with you
Assess your suitability for the position you applied for and make hiring decisions	<ul style="list-style-type: none">• Legitimate interests• Necessary for performing a contract with you

Communicating with you and third parties (including the Employer of Record and your references) regarding your application and candidacy	<ul style="list-style-type: none"> • Legitimate interests • Necessary for performing a contract with you • Consent- you will authorize us to contact your references
Comply with applicable laws and employment-related requirements	<ul style="list-style-type: none"> • Compliance with legal obligations • Legitimate interests
Monitoring and ensuring compliance with applicable policies and procedures	<ul style="list-style-type: none"> • Compliance with legal obligations • Legitimate interests
Comply with legal and regulatory requests and obligations (including investigations)	<ul style="list-style-type: none"> • Compliance with legal obligations • Legitimate interests
Establish or defend legal claims and allegations.	<ul style="list-style-type: none"> • Legitimate interests
To accommodate your application and interview	<ul style="list-style-type: none"> • Consent as permitted by local law • Necessary to carry out the obligations and exercise specific rights of you or Olo
Evaluate you for other job opportunities at Olo, including to assess your eligibility for available positions at Olo and inform you of these opportunities	<ul style="list-style-type: none"> • Consent

When we reference “legitimate interests” of Olo, this can include:

- Assessing your suitability for engagement with Olo.
- Implementation and operation of an organizational structure and information sharing.
- Managing our business operations effectively.
- Prevention of fraud and corruption.
- Improving our recruitment, application and hiring processes.
- Statistical analysis to review and benchmark our hiring practices.
- Compliance with our legal obligations.

When relying on legitimate interests as a lawful basis, we will balance our legitimate interests with your interest and fundamental rights and freedoms in relation to the protection of your personal data to ensure that it is appropriate for us to rely on legitimate interests and to help us identify any additional steps we need to take to achieve the right balance.

Sharing Your Personal Data

We may share your personal data for the processing purposes, as follows, with:

- *Employer of Record.* We share personal data with the Employer of Record because the Employer of Record is your formal employer and responsible for handling all administrative and legal responsibilities for your employment.
- *Service providers.* We share personal data with third parties who perform services on our behalf, including for the uses described above.
- *Your employer or others for reference checks.* We may be required to share your personal data when we verify your employment history or contact references that you have provided.
- *Regulators, authorities or external advisors.* We may share data with regulators, courts and other authorities to comply with our legal obligations or to respond to a court order or administrative or judicial process. We may share personal data with our external advisors such as our lawyers, accountants and other professional advisors when seeking professional advice.
- *Recruitment agencies and employment search firms.* We may share your personal data with recruitment agencies and employment search firms to whom you provided your personal data.
- *With third parties.* We may share your personal data to protect the rights, property, or safety of Olo, you or others.
- *In connection with a corporate transaction.* Your personal data may be disclosed to relevant third parties in connection with, or as part of the due diligence for, any proposed or actual merger, acquisition or any form of sale or transfer of some or all of our assets.

International Transfers

When you submit personal data to us through the Application Sites or otherwise as part of the recruitment, application and hiring processes, that data is collected and processed in the United States. The United States has different data protection laws and requirements from the United Kingdom and your data will be subject to US laws regarding disclosure to the government, courts, law enforcement and regulatory authorities.

Links to Third-Party Websites and Services

The Application Sites may contain links to other websites, apps or services that are not covered by this Notice. These links and plugins are provided for your convenience and

information. We do not own or operate these third-party websites, apps or services. We are not responsible for and do not control any third party's data collection or privacy practices. The inclusion of links to third-party websites, apps or services does not imply endorsement of the linked site or service by us. We encourage you to review the privacy policies or notices on these third-party websites, apps and services before submitting any personal data.

Security

We maintain physical, technical and organizational safeguards to protect the confidentiality, security and integrity of your personal data. Although we use security measures to help protect your personal data against unauthorized disclosure, misuse or alteration, no data transmission or storage system can be guaranteed to be 100% secure.

Retention of Your Personal Data

We will retain your personal data for as long as is necessary for the purposes described in this Notice, or as otherwise permitted or required under applicable law. To determine the appropriate retention period, we will consider the amount, nature and sensitivity of the data; the potential risk of harm from unauthorized use or disclosure of the data; the purposes for which we process the data and whether we can achieve those purposes through other means; and the applicable legal requirements.

Your Rights

Under data protection laws in the United Kingdom, you have certain rights regarding your personal data. Subject to certain conditions, you have the following rights:

- *Access your personal data.* You have the right to receive certain information about the personal data that we process about you and to obtain a copy of the personal data that we hold about you.
- *Rectify your personal data.* You have the right to correct inaccurate personal data, and under certain circumstances, to supplement incomplete personal data that we process about you.
- *Erase your personal data.* You have the right to have your personal data erased under certain circumstances.
- *Restrict processing.* You have the right to restrict our processing of your personal data under certain circumstances.

- Object to processing. You have the right to object to our processing of your personal data when we are relying on legitimate interests as the lawful basis for the processing. You may also object to our processing of your personal data for the purposes of direct marketing or profiling.
- Portability of your personal data. Under certain circumstances, you have the right to receive your personal data in a structured, commonly used and machine-readable format and to request that we transmit such data to another controller.

If you have provided us your consent to process your personal data, you can withdraw your consent at any time. If you withdraw your consent, this will not affect the lawfulness of the processing of your personal data before you withdrew consent.

You can exercise any of these rights by submitting a request to us at dataprivacy@olo.com. We may request specific information from you to confirm your identity prior to processing your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you the reason why, unless we are not permitted by law to disclose the reason.

If you would like to submit a complaint about our use of your personal data or our response to your personal data request, you may contact us at dataprivacy@olo.com. You also have the right to submit a complaint to a competent data protection supervisory authority, which is the Information Commissioner's Office in the United Kingdom.

Controller

The controller determines how your personal data is processed. The controller of your personal data is Olo Inc., One World Trade Center, 285 Fulton Street, 82nd Floor, New York, NY 10007.

Contact Us

If you have any questions about this Notice or how we process personal data or would like to exercise your rights as a data subject, you may contact us at dataprivacy@olo.com.