Request for Documents and Data – Wolt Slovenia

We kindly request that you provide the requested documents as well as aggregate and anonymised data for the Slovenian market covering the last 24 months (broken down by month and/or quarter). The data must be consistent with your Algorithmic Transparency Report (4th edition; published 7 October 2025) and the Privacy Statement for courier partners (particularly with regard to the processing of location data).

Legal Basis for the Request

This request for transparency and access to data is grounded in the GDPR (Articles 5, 6, 9, 15, 17, 22) and the relevant provisions of Directive (EU) 2024/2831 on improving working conditions in platform work (Articles 6, 7, 8, 10, 12, 13).

Data Format

Data shall be provided in a structured, machine-readable format (e.g. CSV, Excel, and JSON for metadata) to facilitate analysis.

Justification of Exceptions

If any data cannot be provided due to GDPR reasons (e.g. Article 9) or because they constitute trade secrets, please provide a precise justification (in accordance with Article 5(3) GDPR) together with alternative aggregate estimates.

A. Provision of Documentation

Please provide the following current documents applicable to the Slovenian market, including the current version in force and the date of the last amendment for each document:

1. Sample contracts: Standard-form partnership agreement concluded with couriers (student work referral, sole proprietor, limited liability company), including all annexes (e.g. Annex 2, Cash Deposit Amendment).
2. Fleet contracts: Sample contract concluded with intermediary companies (fleets).
3. Payment documentation: Documentation of the current 2025 payment model, including the fixed base rate and all dynamic multipliers.
4. Rules and policies: All current Community Guidelines, Operational Rules or Terms of Service for couriers.
5. Privacy: The latest valid Privacy Statement for courier partners.
6. Audit records: The most recent internal or independent audit reports on algorithmic compliance with the GDPR and the Directive (e.g. Data Protection Impact Assessment – DPIA pursuant to Article 35 GDPR).

B. Provision of Aggregate Data

To identify trends and impacts, we also request a comparative analysis of data before and after the acquisition by DoorDash (where policies have affected operations in Slovenia).

B.1. Definition and number of active couriers

- Please provide your exact definition of an “active courier” (e.g. at least X deliveries in period Y).
- Based on that definition, please provide the precise number of active individuals, broken down by: contractual status (sole proprietor, part-time sole proprietor, LLC, student work referral, other forms), gender breakdown (state whether you collect this data), age groups (e.g. under 25, 25–35, 36–45, 45+), delivery zones and citizenship (or data that could indicate nationality/ethnic origin).
- Addendum: If gender, age or citizenship are not collected, please explain how this affects bias testing of the algorithms (e.g. use of proxy variables such as location).

B.2. Intermediary companies (Fleets) and Definition of Subcontractors

This section addresses potential differences in the definition and inclusion of couriers across services (standard delivery vs. Wolt Drive), in accordance with Article 7 of Directive (EU) 2024/2831 on platform work transparency.

1. Confirmation of cooperation model (Articles 6 and 11 of the Directive):
    - If you do not use intermediary companies (fleets), please provide official confirmation of this fact and a detailed explanation of your policy on direct partnerships with couriers, including the mechanisms that ensure the absence of joint and several liability (e.g. for social security contributions or safety measures).
    - If fleets are not part of the model, please explain how this affects compliance with Article 6 of the Directive (health and safety) and Article 11 (worker representation), including any alternative mechanisms you have in place to protect couriers.
2. Clarification of Wolt Drive and subcontractors (Article 7 of the Directive):
    - Please clarify any differences in the cooperation model between standard courier services and specialised services such as Wolt Drive, where your documents (e.g. Wolt Drive Privacy Terms | Subcontractors, available at https://explore.wolt.com/en/svn/wolt-drive/subcontractors) refer to “fleet partners” in the context of data processing for deliveries.
    - Do the terms “fleet couriers” or “fleet companies” used in those documents include subcontractors (e.g. sole proprietors or LLCs operating under a fleet), and how does this differ from the standard model? If yes, please provide a precise definition of these terms and the legal basis for their use (e.g. pursuant to Article 28 GDPR on processors).

    - Please confirm that data for all such couriers (including those under “fleet partners”) are fully included in the aggregate and anonymised data on active couriers in point B.1; if not, please provide a precise justification pursuant to Article 5(3) GDPR (accountability) and alternative aggregate estimates.
3. Data (where fleets or subcontractors are used):
    - If fleets or subcontractors (including “fleet partners” in Wolt Drive) are used (or if the answer to question 2 is affirmative), please provide: the number of such companies, the average and median number of couriers per fleet, and a description of the commission model between Wolt and the fleet (e.g. percentage, fixed amount).
    - If the data are not available, please provide alternative aggregate estimates and an explanation of how this affects the overall analysis of earnings and deactivations (e.g. in B.5 and B.6).

B.3. Time analysis (Task, Idle, Online time)

- Average, median and quartile weekly hours for: “Online time” (time logged into the app, regardless of whether a task is assigned), “Task time” (time from acceptance to completion of delivery) and “Idle time” (waiting time, calculated as online time minus task time).
- All data broken down by contractual status and time blocks (06:00–14:00, 14:00–23:00, 23:00–06:00).
- Incident data: Aggregate data on reported incidents, broken down by time block. Definition: incidents include traffic accidents, health issues and verbal attacks, with aggregate counts by type.

B.4. Analysis of night work (23:00–06:00)

- Percentage of total Task Time hours that fall in night hours.
- Average number of active couriers during this period (broken down by delivery zone).
- Average number of night-work hours per courier per week/month.

B.5. Earnings analysis

- Median, average and quartile gross hourly earnings and net hourly earnings (including bonuses, after deduction of any Wolt commission but before deduction of courier costs or fleet commission).
- All data broken down by: contractual status, delivery zone, vehicle type and time block.
- Addendum: Please provide a breakdown of bonuses by type (e.g. peak-hour bonus, referral bonus, long-distance bonus) and their issuance frequency.
- Please state the average and median percentage commission that Wolt charges directly to couriers (if any).

B.6. Deactivations

- Exact number and percentage of temporary and permanent deactivations.

- Data broken down by: contractual status, length of cooperation (<6 months, 6+ months) and citizenship.
- Detailed breakdown by reason: ‘Low rating’ (state threshold), ‘Breach of contract’ (specify which clauses are most frequently breached, e.g. cash deposit clauses), ‘Suspected fraud’ (state main types), ‘Inactivity’ (state threshold), ‘Customer complaints’, ‘Failed background check’.

B.7. Appeals against deactivations

- Number of appeals filed and successful appeals.
- Average resolution time and percentage resolved in less than 7 days.
- Addendum: Data on re-activations after deactivation (e.g. percentage that returns after 3 months).

B.8. Fluctuation and courier retention

- Courier “retention rate” (percentage remaining on the platform after 1, 3, 6, 12 and 24 months).
- Average length of cooperation (in months), broken down by status and delivery zone.

B.9. Data on AI impact

- Aggregate data on correlations between algorithmic parameters (e.g. acceptance rate, rating, waiting time) and earnings/deactivations, broken down by demographic groups (where available).

C. Questions on the Operation of the Algorithmic System (EU Directive, GDPR)

C.1. Theme 1: Task allocation and fairness (Article 7)

- C.1.1. List of parameters and weights: Complete list of parameters and their relative weights that the algorithm takes into account when offering a task (e.g. location, vehicle type, acceptance rate, rating, waiting time, etc.). Please include a simplified pseudocode or a diagram. Addendum: If weights are not fixed, please describe how they are dynamically adjusted (e.g. via ML models) and the frequency of updates.
- C.1.2. Processing of location data (GDPR): Explanation of the purpose and legal basis (GDPR Article 6) for collecting courier location data at high frequency in “Online” status (e.g. every 2–5 seconds), even when no delivery is active. Addendum: Please provide a summary of the DPIA for location data, including minimisation measures (Article 5 GDPR).
- C.1.3. AI explainability (“black box”): Description of the methodology used to explain decisions of complex models (e.g. reinforcement learning and deep learning models). Which technical methods (e.g. SHAP, LIME or similar) do you use to ensure explainability of individual decisions (Article 8)? Role of “City Optimiser”: Does this system (or a similar AI) adjust weights based on learned outcomes of past deliveries (e.g. reducing delays)? Indirect impact: How do you ensure that this optimisation for

"efficiency" does not indirectly create a "lower priority rating" for courier profiles that have had more delays in the past (even when those delays were due to factors beyond their control)? Addendum: Example of SHAP values for a hypothetical task-allocation decision.

- C.1.4. Impact of loyalty and performance: Does length of cooperation (time since registration) affect algorithmic priority? Do you operate in Slovenia any system comparable to the "Top Dasher" programme (DoorDash USA) that gives preference to couriers with higher task acceptance rates or other performance metrics?
- C.1.5. Impact of rejections (acceptance rate): How does rejecting a task affect the likelihood of receiving subsequent offers (e.g. time delay, lowered priority, placement at the back of the queue)? If there is an effect, please describe the exact mechanism: after how many rejections it triggers, duration of the mechanism and reset conditions.
- C.1.6. Impact of courier density: Does the algorithm take into account group factors such as courier density in an area, and how does this affect individual priority (e.g. prioritisation in less saturated zones)?
- C.1.7. Discrimination and bias testing: Technical and procedural measures (e.g. regular audits) against discrimination of couriers (e.g. by status, nationality or delivery zone), and how you document them (in accordance with Article 10 of the Directive on non-discrimination). Addendum: Most recent bias audit report, including metrics (e.g. disparate impact ratio).

C.2. Theme 2: Feedback system (Article 8: Human oversight)

- C.2.1. Impact of ratings: How are ratings (from customers and restaurants) quantified and used as input parameters in the algorithm? State the threshold at which a drop in average rating automatically reduces priority.
- C.2.2. Appeal procedure for ratings (Article 8): What is the exact procedure for a courier to challenge a negative rating they believe resulted from factors beyond their control? Who (human or automated system) reviews the appeal?
- C.2.3. Suspension of impact: Is the algorithmic impact of a negative rating (e.g. lowered priority) temporarily suspended during the appeal process? If not, how do you justify this under Article 8 of the Directive?
- C.2.4. Appeal statistics: Success rate of appeals against negative ratings in the last 12 months? Addendum: Broken down by rating type (customer vs. restaurant).

C.3. Theme 3: Payment model and earnings transparency (Article 7)

- C.3.1. Components and payment optimisation: Complete list of all components that determine payment. Does the algorithm consider any other factors beyond the standard ones (time, distance, weight, traffic, weather)? What is the relative weighting of these components in the final payment? Are the monetary weights of these parameters set by humans or subject to automated optimisation? If you use a payment optimisation system, what is the objective (e.g. cost reduction, maximisation of efficiency)? Addendum: If optimisation involves AI, please describe the training data (e.g. dataset size, sources).

- C.3.2. Payment individualisation: Are monetary values and weights calculated at regional level or individual level? Would two couriers with the same vehicle type waiting at the same location receive exactly the same offer for the same task?
- C.3.3. Specific payment components: Precise explanation of the components 'UpfrontPricingAdjustment' and 'TaskCapabilityCost'. What is the logic behind these adjustments and is the courier transparently informed of them before accepting the task? Complete list of all possible "bonuses" and "deductions" from payment.
- C.3.4. Bundled orders: How does the algorithm bundle orders and how is payment calculated in such cases compared to two separate deliveries?
- C.3.5. A/B testing: Do you conduct A/B testing of changes to the payment model on specific groups of couriers, and if so, how are participants informed? Addendum: If yes, please provide assurance of compliance with Article 22 GDPR (automated decision-making without consent).
- C.3.6. Practical examples (audit): For at least three anonymised but real payment examples (e.g. short delivery, long delivery with bonus, bundled order), please show the exact calculation: how the base rate, surcharges and multipliers add up to the final payment.
- C.3.7. Calculation of "estimated time": How does the system calculate the "estimated time" that forms the basis for payment? Does the calculation include real-world factors such as: average waiting time at a given restaurant at specific hours, searching for parking, walking to the customer's door? Does the algorithm take into account historical performance (e.g. average speed, delays) of a particular vehicle type or courier profile when calculating estimated time? Addendum: Does the calculation use external APIs (e.g. Google Maps for traffic) and how are inaccuracies handled?

C.4. Theme 4: Deactivations, safety and human oversight (Articles 8, 10, 12)

- C.4.1. Automated triggers: Complete list of automated triggers (metrics) that can lead to deactivation, including exact thresholds (e.g. average rating drop below X, rejection rate above Y %, data that trigger suspected fraud). Can a courier reach a deactivation threshold if the system ("City Optimiser") consistently rates them as "high risk for delay" or "inefficient" based on learned data, even without a direct contractual breach? Addendum: Pseudocode for fraud suspicion triggers.
- C.4.2. Appeal procedure and human review (Articles 8 and 12): Exact appeal procedure for deactivation, including deadlines. Is every permanent deactivation decision reviewed by a human (as required by Article 8 of the Directive)? How do you ensure the review is substantive and independent of the original automated decision (e.g. ability to review algorithmic audit logs)? Does the courier have access during the appeal to all specific evidence (e.g. which ratings, which location data) that led to the decision (pursuant to Article 12 of the Directive)?
- C.4.3. Health, safety and incidents (Article 6): What safety procedures (e.g. automatic alerts, support chat) are activated in the event of accidents (e.g. night-time traffic accident)? Description of the mechanisms used to verify fleet compliance with labour law (e.g. payment of contributions, social insurance pursuant to Article 6 of the Directive).

- C.4.4. Preventive measures: Are there preventive measures such as automated warnings to the courier before they reach a deactivation threshold?
- C.4.5. Data deletion after deactivation (GDPR Article 17): What is the process for deleting personal data after account deactivation (including location data, chat logs), including deadlines and deletion confirmation (in accordance with the “right to be forgotten”)?
- C.4.6. Prohibited data (Article 10): How do you technically ensure that the algorithm does not process data that are not directly related to the performance of work (e.g. location when the courier is offline, demographic data), in accordance with the principle of data minimisation (GDPR Article 5)?

C.5. Theme 5: General compliance and future changes

- Please describe planned algorithmic changes in 2026 (e.g. due to the Directive).
- How do you incorporate courier feedback into improvements to the platform and algorithms (Article 13 of the Directive)?