

The logo for SIXT, featuring the word "SIXT" in a bold, black, sans-serif font. A stylized orange swoosh is positioned above the "I" and "X".

**SIXT** PRIVACY POLICY  
FOR APPLICANTS

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In the following, we would like to inform you about the processing of your personal data during the application process and your related rights.

You are not contractually or legally obliged to provide us with your personal data. However, please note that it may not be possible to establish an employment contract if we are not permitted to process your data for the purposes outlined below.

## I CONTROLLER & CONTACT DETAILS OF THE DATA PROTECTION OFFICER

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The controller within the meaning of Regulation (EU) 2016/679 – General Data Protection Regulation (“GDPR”) responsible for processing your data (“controller”) during the application process is the respective SIXT company to which you are applying (hereinafter also referred to as SIXT).

For any questions regarding employee data protection, you may contact the following email address at any time:

[gdpr-pm@sixt.com](mailto:gdpr-pm@sixt.com)

You can contact our data protection officer either via the above email address or at the address of the SIXT company to which you have applied (keyword: data protection officer).

## II CATEGORIES OF PERSONAL DATA

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The following categories of personal data may be processed by us in connection with your application:

|                                     |                                                                                                                                                                    |
|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Master Data                         | e.g., name, address, telephone number, email address, identification number                                                                                        |
| Qualification Data                  | e.g., educational background, previous employment, grades, references                                                                                              |
| Communication Data                  | e.g., communication content such as emails, letters, faxes, chat logs, and transcripts                                                                             |
| Financial Data                      | e.g., bank account details, salary information                                                                                                                     |
| Social & Tax Data                   | e.g., social security number, health insurance data, tax number                                                                                                    |
| Driver's License Data               | e.g., driver's license number, issue date, expiration date, license classes, result of the validity check, copy of the driver's license                            |
| Identity Card / Passport Data       | e.g., ID card/passport number, issue date, expiration date, country, result of the validity check, copy of the ID card/passport                                    |
| Log Data                            | e.g., logs und events                                                                                                                                              |
| Audio Material                      | e.g., call or conversation recordings                                                                                                                              |
| Voluntary Data                      | Data that you provide on a voluntary basis without an explicit request.                                                                                            |
| Special Categories of Personal Data | e.g., information on disabilities, vaccination status, examination results/findings, as well as test results for substances such as alcohol, drugs, or medications |

## III LEGAL BASES

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Depending on the type and purpose of the processing, the following legal bases of the GDPR may apply:

|                                     |                                                                                                                                                                                                                                                                                    |
|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Art. 6 (1) sentence 1 point a) GDPR | Pursuant to this provision, the processing of your personal data is lawful if and to the extent that you have given your consent to such processing.                                                                                                                               |
| Art. 6 (1) sentence 1 point b) GDPR | Pursuant to this provision, the processing of your personal data is lawful if such processing is necessary for the performance of a contract to which you are party, or in order to take steps at your request prior to entering into a contract (e.g., your employment contract). |

|                                     |                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Art. 6 (1) sentence 1 point c) GDPR | Pursuant to this provision, the processing of your personal data is lawful if such processing is necessary for compliance with a legal obligation to which SIXT is subject.                                                                                                                                                                                 |
| Art. 6 (1) sentence 1 point f) GDPR | Pursuant to this provision, the processing of your personal data is lawful if such processing is necessary for the purposes of the legitimate interests pursued by the controller, i.e., SIXT, or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, i.e., you yourself. |

## IV PURPOSES OF PROCESSING

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### 1 Application portal

#### Purposes of data processing

In order to centrally receive, process, and evaluate applications, thereby making the application process – including the assessment of your suitability, communication with you, as well as documentation and internal coordination of the selection process – as efficient and applicant-friendly as possible, we use an online application portal.

Here we may process your master data, qualification data, communication data, and any voluntary data you provide.

#### Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

### 2 Processing your application & conducting interviews

#### Purposes of data processing

In the context of the application process, we process your personal data to handle your application, check your suitability for the advertised position, and properly conduct the application process. We review your details and documents – such as your CV, cover letter, certificates, and other qualification proofs – and match them with the requirements of the respective position. If necessary for the assessment of your qualifications, tests, case studies, or similar procedures may be conducted, and their results will be considered in our decision.

You may be invited to personal, telephone, or virtual interviews during the process. The latter can take place via telephone or using online meeting tools. To coordinate and invite you to these interviews, clarify any questions, request additional information or documents, and update you on the progress of your application, we may contact you by phone, email, SMS, or WhatsApp.

Here we may process your master data, qualification data, communication data, and any voluntary data you provide.

#### Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

Art. 6 (1) sentence 1 point f) GDPR.

Our legitimate interest is to ensure a fast and efficient application process and thereby increase applicant satisfaction.

### 3 Recording & analysis of Interviews

#### Purposes of data processing

For training purposes, and to carry out and improve our application process, we may – provided you have given your prior consent – create transcripts of interviews and evaluate them. You may withdraw your consent at any time with effect for the future.

Here we may process your master data, qualification data, communication data, audio material, as well as any

voluntary data that you provide.

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) GDPR.

#### **4 Employee onboarding**

Purposes of data processing

If you are hired and an employment contract is concluded, the personal data required for the commencement of the employment relationship will be transferred to our HR management system. This data is processed to establish and subsequently execute the employment contract for the purposes specified in the privacy policy for employees, for example, to provide work materials, devices, system access, and similar.

Here we may process your master data, qualification data, communication data, driver's license data, and voluntary data. Additionally, financial data and social and tax data may be processed for payroll purposes and to fulfill legal documentation and reporting obligations.

Legal basis for the above processing

Art. 6 (1) sentence 1 point b) GDPR.

Art. 6 (1) sentence 1 point c) GDPR.

#### **5 Talentpool**

Purposes of data processing

If you consent to being included in our talent pool, we store and process your personal data to inform you – after the conclusion of the application process – by email, SMS, or WhatsApp about future job openings and positions that match your profile. You may withdraw your consent at any time with effect for the future.

Here we may process your master data, qualification data, communication data as well as any voluntary information provided.

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) GDPR.

#### **6 Satisfaction surveys**

Purposes of data processing

If you give your explicit consent, we will process your personal data to send you satisfaction surveys after the application process is completed. The surveys serve to continuously improve our application process, further develop our recruiting measures, and increase candidate satisfaction. You may withdraw your consent at any time with effect for the future.

Here we may process your master data, communication data, as well as voluntary data that you provide.

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) GDPR.

#### **7 Data transfers to job portals**

Purposes of data processing

If you provide your explicit consent, we will transfer, after completion of the application process, a unique identification number and information about your application progress (e.g., whether you were invited to interviews, dropped out after a certain round, or were hired) to the job portal through which you applied to us. This serves to optimize the distribution of our job postings and to further develop the job portal's recommendation algorithms so that suitable candidates are shown more relevant job advertisements in the future. You can withdraw your consent at any time with future effect.

Here we process your master data and information on your application process.

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) GDPR.

## 8 Process optimization

Purposes of data processing

SIXT may process personal data to continuously improve the application process and adapt it to the needs of applicants. For this, we may analyze application and usage data (e.g., regarding application paths and channels, response and processing times, appointment coordination, dropout points in the process) – for example, to evaluate the effectiveness of recruiting measures and job advertisements and to identify areas for improvement in the process.

Here we may process your personal data specified under **CATEGORIES OF PERSONAL DATA** to the extent necessary. Where possible, analyses are carried out in anonymized or pseudonymized form.

Legal basis for the above processing

Art. 6 (1) sentence 1 point a) GDPR, if we carry out measures that require explicit prior consent.

Art. 6 (1) sentence 1 point f) GDPR.

Our legitimate interest is to continuously improve our application process, further develop our recruiting measures, and increase candidate satisfaction.

## 9 Legal disputes

Purposes of data processing

In the context of legal disputes, we may process your personal data outlined under **CATEGORIES OF PERSONAL DATA**, as required, to assert SIXT's claims or to defend against claims asserted against SIXT. We may also process your name and address to identify you as a witness in court proceedings.

Legal basis for the above processing

Art. 6 (1) sentence 1 point f) GDPR.

Our legitimate interest is to pursue or defend legal claims by or against SIXT.

## V ARTIFICIAL INTELLIGENCE ("AI")

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As part of the processing of personal data described in this privacy policy, we may use artificial intelligence. This could be for the following purposes:

- Process support, e.g. for scheduling and maintaining master data,
- Reviewing, evaluating, and summarizing application documents,
- Preliminary assessment of applicants' suitability based on defined criteria,
- Creation and evaluation of interview notes and transcripts,
- Assistance with the creation, revision, analysis, and review of content, as well as accessing, preparing, and utilizing company knowledge,
- Data analysis, evaluation, and identification of patterns, trends, and connections, as well as the creation of forecasts and support in decision-making.

Artificial intelligence is used in accordance with the legal requirements of the GDPR and Regulation (EU) 2024/1689 – the Artificial Intelligence Act ("AI Act") – and serves exclusively supportive, preparatory, or controlling purposes. Automated decision-making or profiling with legal effect or similarly significant impacts as described in Art. 22 GDPR does not take place. All decisions regarding invitations, hiring, or rejections are made by qualified employees and personal data from applications is not used to train AI models. Processing occurs solely for the use of the respective AI function and, if necessary, for troubleshooting.

## SOURCES OF YOUR DATA

Generally, we collect the personal data specified under **CATEGORIES OF PERSONAL DATA** directly from you during the application process. In certain cases however, we may also receive your personal data from the following third parties:

- Recruitment agencies / recruiting service providers,
- Job portals and career networks,
- Companies of the SIXT Group.

## VII CATEGORIES OF RECIPIENTS OF YOUR DATA

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In connection with your application to SIXT, we may transfer your personal data to the following categories of recipients to fulfill our contractual and legal obligations as well as our legitimate interests:

- **Companies within the SIXT Group**

For the purposes described in this privacy policy, we may transfer your personal data to companies within the SIXT Group – for example, as part of providing group-internal services or handling the application process.

- **External service providers**

For the purposes described in this privacy policy, we may also transfer your personal data to specialized service providers, which include in particular:

- IT service providers and hosting providers,
- Job portals and career networks,
- Recruitment agencies / recruiting service providers,
- Service providers for marketing.

- **Other recipients**

Additionally, we may transfer your personal data to other recipients, which may include:

- Authorities (e.g., tax authorities and law enforcement agencies),
- Lawyers and courts,
- Auditors.

If any of the described transfers of data are considered processing on behalf of a controller pursuant to Art. 28 GDPR, we ensure that such processing only takes place based on data processing agreements that meet the legal requirements. These agreements require the processor, among other things, to process personal data only under our instructions and for specifically defined purposes, ensure an appropriate level of data security, and comply with data protection obligations – especially with regard to fulfilling data subject rights and implementing appropriate technical and organizational measures.

If certain data transfers instead occur under joint controllership pursuant to Art. 26 GDPR, this is based on a joint controllership agreement. This agreement sets out, among other things, the respective roles and responsibilities regarding compliance with data protection obligations – such as which data controller is responsible for which duties in relation to the fulfillment of data subject rights or the fulfillment of information duties. The essential content of such agreements is provided by SIXT upon request.

## VIII DATA TRANSFERS TO THIRD COUNTRIES

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Some of the aforementioned recipients of your personal data may also be located in so-called third countries. Third countries are countries outside the European Economic Area (EEA). The EEA includes all countries of the European Union as well as the countries of the European Free Trade Association (EFTA), namely Norway, Iceland, and Liechtenstein.

Data transfers to such countries may, for example, occur if we use external service providers based in a third country.

The transfer of your data to a third country is based on an adequacy decision by the European Commission. If no adequacy decision by the European Commission exists for the respective third country, then the transfer to that third country will take

place subject to appropriate safeguards as per Art. 46 (2) GDPR. You can request copies of these safeguards from the SIXT company with which you have concluded your employment contract or via the following email address: [gdpr-pm@sixt.com](mailto:gdpr-pm@sixt.com)

In addition, some recipients of your personal data based in the USA are certified under the Data Privacy Framework ("DPF"). For such recipients, there is a restricted adequacy decision of the European Commission for certain data categories. To the extent of the valid DPF certification of the data recipient, the transfer of personal data is based on this adequacy decision.

## IX RETENTION PERIOD

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We store the personal data collected during the application process until the underlying purposes no longer apply or for as long as it is necessary to carry out the application process and decide on the establishment of an employment relationship.

Below you will find an overview of the most relevant standard deletion periods:

- **Applications that do not lead to employment**

If your application does not result in employment at the end of the application process, we will delete your application documents and personal data no later than six months after completion of the application procedure, unless there are legitimate interests that prevent deletion.

- **Applications resulting in employment**

In the event of a successful application, the collected data will be transferred to the personnel management system for the purpose of establishing and subsequently executing the employment contract in accordance with the privacy policy for employees.

- **Applications with consent for inclusion in the Talent Pool**

If you have consented to being included in our talent pool and the associated longer storage of your application documents or personal data, the data will be stored on the basis of your consent until you withdraw your consent or request the deletion of your personal data. Otherwise, we will delete your data after 2 years of inactivity.

If we are legally obliged to retain personal data, this storage will take place for the duration of the statutory obligation. These requirements include statutory limitation periods, which can range from three to thirty years. Additionally, retention periods according to tax and commercial regulations may be up to ten years. If applicable, your data will be blocked for operational use during this time, provided there is no other purpose for processing. The legal basis for this storage is Art. 6 (1) sentence 1 point c) GDPR in conjunction with the respective statutory provisions.

## X AUTOMATED DECISION-MAKING

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The aforementioned data processing does not include any automated decision-making pursuant to Art. 22 GDPR.

## XI DATA SUBJECT RIGHTS

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### Purposes of data processing

You can assert the rights mentioned below. Your requests to assert data protection rights and our responses to them will be stored for documentation purposes for a period of three years after the end of the year in which we responded to your request and in individual cases longer for the establishment, exercise or defense of legal claims.

### Legal basis for the above processing

Art. 6 (1) sentence 1 point f) GDPR.

Our legitimate interest is protecting against claims or fines under Art. 82, 83 GDPR and fulfilling our accountability obligations under Art. 5 GDPR.

### 1 Right of access by the data subject, Art. 15 GDPR

You have the right to, at reasonable intervals, obtain information about your personal data under storage. The information you are entitled to includes information about whether or not SIXT has stored personal data concerning you, about the categories of personal data concerned, and about the purposes of the processing. Upon request, SIXT will provide you with a copy of the personal data that are processed.

If you wish that, as part of providing information about your personal data under storage, we also provide

information about data collected through cookies or similar technologies when using our websites, we kindly ask you to provide us with your cookie IDs. You can find these in your browser, e.g. by opening the Developer Tools, selecting the "Console" tab, then entering the command "document.cookie" and confirming by pressing the Enter key. The cookie IDs will then be displayed.

If you also want information about any data collected through cookies or similar technologies while using our app, please provide us with a special device ID. On Android devices, this is called the AAID (Android Advertising ID) and can be found in your settings. On Apple devices, this is called the IDFA (ID for Advertisers) and is not visible by default. There are, however, third-party apps available in the Apple App Store to display this ID.

## **2 Right to rectification, Art. 16 GDPR**

You also have the right to obtain from SIXT the rectification of inaccurate personal data concerning you or to have incomplete data completed.

## **3 Right to erasure, Art. 17 GDPR**

You furthermore have the right to obtain from SIXT the erasure of personal data concerning you. We are under obligation to erase personal data in certain circumstances, including if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, if you withdraw the consent on which the processing is based, or if the personal data have been processed unlawfully.

## **4 Right to restriction of processing, Art. 18 GDPR**

Under the legal requirements, you have the right to restriction of the processing of your personal data.

## **5 Right to data portability, Art. 20 GDPR**

You have the right to receive the data that you have provided to us on the basis of your consent or a contractual relationship in a machine-readable format, or – at your request – to have it transferred to a third party.

## **6 Right to object, Art. 21 GDPR**

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### **Right to object in certain cases**

If the processing of your data by SIXT is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Art. 6 (1) sentence 1 point e) GDPR) or is based on the legitimate interests of SIXT (Art. 6 (1) sentence 1 point f) GDPR), then you have the right to object at any time, on grounds relating to your particular situation, to the processing of your data. This also applies to any profiling based on this provision as defined by Art. 4 no. 4 GDPR. We will then end the processing, unless we can present compelling legitimate grounds for such processing that supersede the grounds for ending the processing.

You may submit your objection without the need to adhere to a particular format to the SIXT company with which you have your employment contract or to the email address: [gdpr-pm@sixt.com](mailto:gdpr-pm@sixt.com)

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## **7 Right to withdraw, Art. 7 (3) GDPR**

If data processing at SIXT is based on your consent, then you have the right to, at any time, withdraw the consent you granted. The withdrawal of consent shall not affect the lawfulness of processing between the time consent was granted and the time it was revoked.

## **8 Contact information to exercise the rights of data subjects**

If you wish to exercise your rights as a data subject, please direct such requests to the e-mail address:

[gdpr-pm@sixt.com](mailto:gdpr-pm@sixt.com)

## **9 Right to lodge a complaint, Art. 77 GDPR**

You have the right to lodge a complaint with a supervisory authority (Art. 77 GDPR). You can exercise this right before a supervisory authority in the Member State in which you are resident, where your place of work is or the place where the suspected infringement is committed. In Luxembourg, where Sixt S.à.r.l. has its headquarters,

the competent supervisory authority is:  
Commission Nationale pour la Protection des Données (CNPD)  
15, Boulevard du Jazz  
L-4370 Belvaux  
Luxembourg

**General information**

We reserve the right to amend and adapt this Privacy Policy with effect for the future.

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