

SIXT PRIVACY POLICY
FOR APPLICANTS

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 SIXT COMPANY INFORMATION & CONTACT DETAILS

The “business” within the meaning of the California Consumer Privacy Act of 2018 as updated by the California Privacy Rights Act of 2020, and any amendments, final regulations, and successor legislation (“CCPA”) 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:

Privacy-us@sixt.com.

II CATEGORIES OF PERSONAL DATA

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

Identifiers (or “Master Data”)	e.g., name, address, telephone number, email address, identification number, Social Security Number
§ 1798.80: personal information described under Cal. Civ. Code § 1798.80 to the extent not already included in other categories in this section	e.g., a photograph or health information
Communication Data	e.g., communication content such as emails, letters, faxes, chat logs, and transcripts
Financial Data	e.g., bank account details, salary information
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
Characteristics of Protected Classifications Under California or Federal Law for Applicants	Collected on a purely voluntary basis, except where collection is required by law, and used only in compliance with applicable laws and regulations, for diversity and inclusion reporting and related purposes
Internet Activity Information	e.g., interactions with Sixt’s Internet web site, job application, or job advertisement, and publicly available social media activity
Commercial Information	e.g., travel expense records for an interview
Professional or Employment-Related Information (or “Qualification Data”)	e.g., educational background, previous employment, grades, references
Non-public educational information	e.g., academic transcripts
Sensory data, such as audio, electronic, visual, or other similar information	e.g., call, video or conversation recordings, video surveillance in common areas of our facilities

Voluntary Data	Data that you provide on a voluntary basis without an explicit request, e.g., hobbies and leisure activities or membership in voluntary/charitable/public organizations, for example, as stated on your resume
Inferences	e.g., Sixt might infer characteristics from a personality assessment completed by the applicant
Characteristics of Protected Classifications Under California or Federal Law for Applicants	Data collected on a purely voluntary basis, except where collection is required by law, and used only in compliance with applicable laws and regulations, for diversity and inclusion reporting and related purposes

Note on inferring characteristics: Sixt does not collect or process sensitive personal information or characteristics of protected classifications for the purpose of inferring characteristics about an applicant.

III PURPOSES OF PROCESSING

1 Application portal

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.

2 Processing your application & conducting interviews

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 resume or 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.

3 Recording & analysis of Interviews

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.

4 Employee onboarding

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.

5 Talentpool

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.

6 Satisfaction surveys

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.

7 Data transfers to job portals

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.

8 Process optimization

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.

9 Legal disputes

In the context of legal disputes, we may process your personal data 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.

10 Purposes For Using Applicant Health Information:

Sixt may process your health data: to the extent necessary to comply with Sixt's legal obligations, such as to accommodate disabilities; to protect the health and safety of Sixt's employees and facilities, for example, to take an applicant's temperature; for occupational health and safety compliance and record-keeping; to respond to an applicant's medical emergency.

Note: This Privacy Policy does not cover health information governed by the Health Insurance Portability and Accountability Act (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH Act), or California's Confidentiality of Medical Information Act (CMIA).

11 Purposes For Using Applicants' Protected Categories of Information:

Sixt collects information about race, age, national origin, disability, sex, and veteran status as necessary to comply with legal obligations, including the reporting requirements of the federal Equal Employment Opportunity Act, The Office of Federal Contracting Compliance Programs (applicable to government contractors), and California's Fair Employment and Housing Act, equal pay and pay transparency laws, and for purposes of diversity and inclusion analytics.

Sixt also uses this personal information for purposes including: (a) with respect to disability and/or medical condition, as necessary, to comply with federal and California law related to accommodation; and (b) with respect to age, incidentally to the use of birth date for identity verification.

Sixt collects protected categories of personal information on a purely voluntary basis, except where required by law, and uses the information only in compliance with applicable laws and regulations.

IV ARTIFICIAL INTELLIGENCE ("AI") AND AUTOMATED DECISION-MAKING

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 exclusively for supportive, preparatory, or controlling purposes. Automated decision-making or profiling with legal effect or similarly significant impacts 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.

V SOURCES OF YOUR DATA

Generally, we collect the personal data specified under **Characteristics of Protected Classifications** directly from you during the application process. In certain cases however, we may also receive your personal data from the following sources:

- Third parties, such as recruitment agencies / recruiting service providers, job references, affiliated companies, professional employer organizations or staffing agencies
- Job portals and career networks,
- Companies of the SIXT Group.
- **Public internet sources**, for example, social media, job boards, public profiles, and other public online sources
- **Public records**, for example, court records, and credentialing and licensing organizations.
- **Automated technologies** on Sixt's electronic resources, for example, to track logins and activity on Sixt's careers page
- **Surveillance/recording technologies installed by Sixt**, for example, video surveillance in common areas of Sixt's facilities, voicemail technologies, webcams, and audio/video recording technologies with consent to the extent required by law
- **Government or administrative agencies**, for example, law enforcement or public health authorities.
- **Acquired company**, if Sixt acquired your employer, Sixt might collect personal information from that employer.

Note: This Privacy Policy does not cover background screening conducted by third-party background check vendors subject to the federal Fair Credit Reporting Act and applicable state law.

VI CATEGORIES OF RECIPIENTS OF YOUR DATA

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.

- **Corporate Transactions**

We may disclose your personal information in connection with a corporate merger, consolidation, bankruptcy, the sale of all, or substantially all, of our membership interests and/or assets or other corporate change, including to any prospective purchasers

- **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,
- Equal Employment Opportunity Commission as required for reporting,
- California Department of Fair Employment and Housing as required to respond to employment claims and charges,
- Law enforcement in the event of criminal investigations.

- **No sales and no “sharing”, i.e., disclosure for cross-context behavioral advertising**

Sixt does not sell the personal information of any Applicants nor share their personal information for cross-context behavioral advertising. For clarity, however, this Privacy Policy does not address the collection of information of applicants as visitors to Sixt’s websites which, subject to the preferences of website visitors, may utilize certain tracking technologies that may be deemed to be the “selling” or “sharing” of personal information.

VII RETENTION PERIOD

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 three years 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 3 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. Additionally, retention periods according to tax and commercial regulations may be up to seven years. If applicable, your data will be blocked for operational use during this time, provided there is no other purpose for processing.

VIII YOUR CALIFORNIA PRIVACY RIGHTS

Subject to applicable law, applicants have the following rights as enumerated under CCPA:

- **Right to Know:** You have the right to submit a verifiable request for copies of specific pieces of your personal information obtained from you and for information about Sixt's collection, use, and disclosure of your personal information.

Please note that the right to obtain copies does not grant a right to the whole of any document that contains personal information, but only to "specific pieces" of personal information. Moreover, applicants have a right to know categories of sources of personal information and categories of external recipients to which personal information is disclosed, but not the individual sources or recipients.

- **Right to Request:** You have the right to request the categories of sources from which your personal information is collected, the business or commercial purpose of collecting, selling or sharing (as applicable) personal information, the categories of third parties with whom we share or sell personal information (as applicable), the categories of personal information about you that we have disclosed for business purposes, know the length of time we retain your personal information, to opt out of the sale or sharing of your information (if applicable), and to limit the use of sensitive personal information (if applicable). This Privacy Policy endeavors to disclose the foregoing information without the need to submit a verifiable request.
- **Right to Delete:** You have the right to submit a verifiable request for the deletion of personal information that you have provided to us.
- **Right to Correct:** You have the right to submit a verifiable request for the correction of inaccurate personal information maintained by Sixt, taking into account the nature of the personal information and the purposes of processing the personal information.
- **Right to Non-Discrimination:** We will not discriminate or retaliate against you for exercising your privacy rights under the CCPA.

We will respond to privacy rights requests in accordance with applicable law if we can verify the identity of the individual submitting the request. You can exercise these rights in the following ways:

Email: privacy-us@sixt.com

We will ask for your name, email address and phone number. We may also require that you submit your request via our the Application Portal's standard authentication procedures (i.e., log on with username and password to submit a request) to ensure you are the person you say you are. If this information or these processes are insufficient to verify your identity and assess your privacy request, we may need to ask for additional information. You may also designate an authorized agent to make a CCPA privacy request.

General information

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

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