

INFORMATION ON THE PROCESSING OF CANDIDATES' PERSONAL DATA

1. About us

This communication (hereinafter also referred to as "Information Notice") is made available to you - pursuant to Art. 13 of the European Regulation 2016/679 on the protection of personal data ("Regulation" or "GDPR"), Legislative Decree no. 196 of 30/06/2003 ("Privacy Code"), and subsequent amendments and additions - by Sixt rent a car S.r.l., (P.I./C.F. 02926070216) with registered office in 39057 Appiano sulla strada del Vino - Frazione Frangarto (Italy), Via Bolzano, 63, in its capacity as Data Controller of your personal data (hereinafter referred to as the "Data Controller").

2. Categories of data processed

Your personal data collected by the Data Controller in connection with your application for "Sixt University" belong to the following categories:

- data provided voluntarily: e.g. (i) 'common' data provided through the information request form on the home page of the <https://www.sixtuniversity.com> website; (ii) data provided during contact interviews; (iii) data indicated in the Curriculum Vitae sent to the Data Controller;
- data collected through other public and/or private sources, such as social platforms (if shared), recruitment companies, application assessment companies, referrers, where permitted by applicable law;
- data collected automatically when electronic communications are sent (e.g. email, SMS, Whatsup, etc.) or the Sixt University website is accessed via the Internet (e.g. URL, date and time of visit, pages selected, IP, etc.).

The data you provide will be processed by means of both manual and automated filing (in the latter case using special computer and telematic tools), exclusively for the purpose of carrying out an objective and qualified assessment of your application for the proposed training and for the subsequent internship. The data may also be processed once the selection procedure for which they were provided is over, in the context of new selection procedures (e.g. to make subsequent job offers), concerning roles or figures similar to those proposed in Sixt University training, without prejudice, in any case, to the data retention period referred to in Article 6 below.

Please do not indicate any particular data (which may reveal racial or ethnic origin, religious, philosophical or other beliefs, political opinions, membership of political parties, trade unions, associations or organisations of a religious, philosophical, political or trade-unionist character, as well as personal data which may reveal state of health or sexual life). Any special data indicated will be immediately deleted in the absence of your written declaration, consenting to the processing of the aforementioned data by Sixt rent a car S.r.l., after having read this Information Notice.

3. Purpose and legal basis for processing

a) legal purposes - processing necessary to comply with a legal obligation to which the Data Controller is subject

Your personal data may be processed, without the need to obtain any consent, in case this is necessary to comply with obligations arising from legal provisions on civil and fiscal matters, community legislation, as well as standards, codes or procedures approved by competent authorities and/or institutions.

In addition, your data may be processed in order to comply with requests by the competent administrative or judicial authorities and, more generally, by public bodies in accordance with legal formalities.

The processing of data in such cases is necessary to enable compliance with regulatory obligations, and failure to provide such data will make it impossible for the Data Controller to proceed with the selection of the application at all stages of the selection, training and internship process.

b) purposes of selecting candidates for the training and internship process - measures to follow up a request by the data subject

Personal data will be processed in order to carry out the selection, training and internship of candidates in the Data Controller's and the SIXT SE Group's interests.

The processing of your data in such cases is necessary for operational, pre-contractual or contractual reasons, and failure to provide your data will make it impossible for the Data Controller to process your application at all stages of the selection, training and internship process.

c) legitimate interest of the Data Controller

The Controller may process, without having obtained any consent, personal data whenever necessary in order to establish, exercise or defend a right of the Controller or the SIXT SE Group.

4. Personal data recipients

For the pursuit of the above-mentioned purposes, the Data Controller may communicate personal data to third parties, such as, for example, to following categories:

- public administrations for purposes of the law (e.g. police forces, financial police), for the fulfilment of legal obligations;
- companies specialising in personnel selection activities on behalf of the Data Controller or the SIXT SE Group;
- companies specialising in training activities on behalf of the Controller or the SIXT SE Group;
- suppliers of goods or services (e.g. consultants, freelancers, IT system providers, cloud service providers, database providers and consultants);
- SIXT SE (*main partner Sixt University*) or companies associated with it;
- Sixt rent a car S.r.l. staff involved in Sixt University-related activities;
- any other public and/or private entity to which it may be necessary to disclose your personal data in connection with the selection, training and internship process and limited to that purpose.

The updated list of Data Processors is available at the Data Controller's registered office and will be provided upon written request.

The Data Controller takes the utmost care to ensure that the communication of your personal data to the aforementioned recipients only concerns the data necessary to achieve the specific purposes for which they are intended.

Your personal data will only be processed by authorised personnel, which will be provided with special instructions on the manner and purpose of processing.

Your data will not be disclosed to third parties except in the cases described above and/or provided for by law.

5. Transfer of personal data outside the European Economic Area

For some of the purposes indicated in this Information Notice, the Data Controller may have to transfer personal data to countries outside the European Union/European Economic Area, to so-called "third countries", also by means of inclusion in databases shared and managed by third companies. Where this occurs, the processing of such data is bound to the purposes for which they were collected and takes place in full compliance with the standards of confidentiality and security set out in the applicable data protection legislation.

Whenever your personal data is transferred internationally outside the EU/European Economic Area, the Data Controller will take all appropriate and necessary contractual measures to ensure an adequate level of protection of your personal data in accordance with the provisions of this Information Notice, including, among others, the Standard Contractual Clauses approved by the European Commission.

6. Data retention periods

Without prejudice to your right to object to the processing of your personal data and/or to request its deletion, Sixt rent a car S.r.l. will only retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected or subsequently processed in order to comply with legal or regulatory requirements.

In particular, your data will be deleted after a maximum period of two years from the date on which it was sent or last updated if your application is not followed by any contact from the Data Controller. In the event that the training and internship has been completed, your data will be deleted after a maximum period of five years from the date of the end of the training process (date of end of internship) in the event that the internship has not been followed by a job offer, in order to allow the Data Controller to evaluate your application for other possible future positions, unless you expressly request not to be considered any further.

When this period expires, your personal data will be removed from Sixt rent a car S.r.l.'s active systems.

7. Your legal rights

Your rights in connection with the personal data that the Controller processes are summarised below and provided for in the GDPR:

Rights	Description
Right to rectification (Art. 16)	You may obtain from Sixt rent a car S.r.l. the rectification of your data inaccurate personal data concerning you without undue delay. Taking into account the purposes of the processing, you have the right to obtain the integration of incomplete personal data, also by providing a supplementary declaration.
Right to restriction (Art. 18)	You may obtain a restriction on the processing of your data personal if: -you contest the accuracy of your personal data during the period in which Sixt rent a car S.r.l. is required to verify its accuracy; -the processing is unlawful; you can request a restriction of the processing rather than the deletion of your personal data; -there is no longer any need for Sixt rent a car S.r.l. to keep your personal data, but you need them in order to ascertain, exercise or defend your rights in court; -you object to the processing while Sixt rent a car S.r.l. checks whether its legitimate reasons prevail over yours.
Right of access (Art. 15)	You can ask Sixt rent a car S.r.l. for information about your personal data with reference to the aspects envisaged in Art. 15 GDPR e.g. purpose of processing; categories of personal data; recipients to whom the data have been disclosed, when possible the period of data retention etc.
Right to portability (Art. 20)	Following your request, Sixt rent a car S.r.l. will transfer your personal data to another data controller, if technically possible, provided that the processing is based on your consent or is necessary for the performance of a contract.

Right to cancellation (Art. 17)

Unless the processing is necessary because of legal obligations or for the establishment, exercise or defence of legal claims.

You may obtain the deletion of your personal data from Sixt rent a car S.r.l. for the reasons indicated in Article 17 GDPR e.g. (i) if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) you have withdrawn the consent on which the processing is based if there is no other legal basis for the processing; (iii) you have objected to the processing and there is no overriding legitimate ground for the processing; (iv) the personal data have been processed unlawfully; (v) the data must be erased in order to comply with a legal obligation etc.

Right to object (Art. 21)

You may object at any time to the processing of your personal data for reasons relating to your particular situation, including profiling, on the basis of these provisions. The Data Controller will refrain from further processing of your personal data unless he can demonstrate compelling legitimate grounds for processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. If you object to the processing, please state whether you wish to delete your personal data or to restrict their processing.

Right of submit a complaint (Art. 77)

In the event of an alleged breach of the applicable data protection law, you may lodge a complaint with the competent authorities in your country or in the place where the alleged breach took place.

8. Amendments to this Policy

Any future changes or additions to the processing of personal data as described in this privacy policy will be made available via the website: <https://www.sixtuniversity.com/> - Privacy Policy section.

9. Data Controller

In order to exercise your rights under Art. 15 ff. of the GDPR, you can contact Sixt rent a car S.r.l., with registered office in Appiano sulla strada del Vino (BZ), via Bolzano, 63 CAP 39057 Frazione Frangarto or via Email PEC sixt@pec.it, as the Data Controller.