

Privacy Policy for applicants

Thank you for your interest in our company and for visiting our website www.careers.autohero.com (hereinafter referred to as "Website").

This privacy Policy informs you about how the Autohero GmbH (hereinafter referred to as "Autohero" or "we") processes your personal data when you apply for a position advertised by us, as well as the rights to which you are entitled.

01. Responsible for the processing of your personal data

The controller responsible for the processing of your personal data within the meaning of the GDPR and other provisions of data-protection law is:

Autohero GmbH
Bergmannstraße 72
10961 Berlin, Germany
phone: +49 0800 6646644
e-mail: info@autohero.com

02. Data protection officer

If you have any questions and/or suggestions on the subject of data protection, you can contact our data protection officer directly at any time. You can reach our data protection officer at the following contact details:

Autohero GmbH
Bergmannstraße 72
10961 Berlin, Germany
e-mail: datenschutz@autohero.com

AUTO1 Group Operations SE
Bergmannstraße 72
10961 Berlin, Germany
e-mail: datenschutz@auto1.com

03. Data collection

Autohero collects the personal data provided by the applicant via the online applicant portal (hereinafter referred to as "applicant data").

AUTO1 Global Services SE & Co. KG, a subsidiary of AUTO1 Group, (hereinafter referred to as "AUTO1 Global") is responsible for conducting the application procedure and processing the application. For this purpose, Autohero transfers the applicant data to AUTO1 Global. The applicant data will be used exclusively for the purpose of the application procedure.

The applicant is informed about the forwarding and processing of the applicant data by AUTO1 Global and gives his express consent to this. This consent is the legal basis for this processing pursuant to Art. 6 (1) lit. a GDPR. Without this explicit consent of the applicant, an application procedure cannot be initiated.

The applicant can revoke his consent at any time by e-mail to datenschutz@autohero.com with effect for the future. With revocation of consent, the applicant withdraws his application.

If the applicant has an active profile on a job application portal such as Xing, Stepstone or similar professional platforms and communicates this to Autohero as part of the application process, Autohero may also receive and collect personal data about it.

04. Storage of applicant data at SmartRecruiters

The software of SmartRecruiters GmbH, Wilhelmstraße 118, 10963 Berlin (hereinafter: "SmartRecruiters") is used for the application process.

For this purpose, the applicant data are stored and processed on the servers of SmartRecruiters in Germany and the EU. AUTO1 Group has carefully selected SmartRecruiters. The protection of the applicant data is ensured by an order data processing contract with SmartRecruiters, according to which SmartRecruiters processes the personal data only on behalf of and in accordance with the instructions of Autohero. SmartRecruiters uses the services of SendGrid Inc., 1801 California Street, Suite 500 Denver, CO 80202, USA (hereinafter: "SendGrid"), in order to support the sending and receiving of e-mails sent to or by the applicant via the SmartRecruiters software. The applicant data are transmitted to SendGrid's servers in the USA and thus to a country outside the EU or the EEA.

We use the AI feature "SmartAssistant" from Smartrecruiters. This technology analyzes the applicant's resume or profile in comparison to the job posting and calculates a matching score. Based on this score, it is determined to what extent the required skills and qualifications are met. SmartAssistant does not replace human decision-making in the recruitment process at AUTO1 Group but is used solely as a supportive tool.

The legal basis for the processing mentioned in this section is Art. 6 para. 1 lit. f GDPR. We have a legitimate overriding interest in sharing personal data with an external service provider for the purpose of an efficient recruitment process.

05. Deletion of applicant data

As a rule, the applicant data are automatically deleted no later than 6 months after the completion of the application procedure if the applicant is not hired. Between the completion of the application process and deletion, the data will be kept for evidence preservation purposes. The legal basis for this processing is Art. 6 (1) lit. f GDPR. The predominant legitimate interest follows from the aforementioned processing purpose.

06. Job Newsletter

The applicants can register for newsletters and thus become a member of the AUTO1 talent pool to receive regular information about suitable jobs and other topics from AUTO1. When registering for the newsletter, AUTO1 will use the applicant's e-mail address to send the respective issue of the newsletter. In addition, analysis data from the newsletter evaluation are processed. The evaluation serves the purpose of measuring the effectiveness of the mail campaign and providing relevant content to the applicants.

In order to prevent unauthorized registration by third parties and to ensure proper registration for the newsletter, a so-called double opt-in procedure is carried out when registering for the newsletter, in which AUTO1 sends the registrants - after entering the e-mail in the registration form - a confirmation e-mail asking the registrants to confirm their registration. AUTO1 stores the specified e-mail address in order to send the newsletter until the applicants unsubscribe or AUTO1 no longer sends the newsletter. The legal basis for this processing is consent in accordance with Art. 6 (1) lit. a GDPR. The applicants can revoke their consent at any time with effect for the future. In this case, AUTO1 will no longer send the newsletter. If AUTO1 receives the revocation of applicants, the personal contact data will be included in a blacklist. This ensures that AUTO1 no longer sends unwanted advertising to the applicants. The legal basis for this processing is Art. 6 (1) lit. f GDPR.

07. "Refer a Friend" program

Our employees and external visitors to our website have the opportunity to recommend applicants for certain positions. The prerequisite is that the applicant agrees to this and the recommending person has credibly demonstrated to us the applicant's agreement. If the applicants decide to apply for the recommended position, the applicant's personal data will be processed in accordance with the regular application process (see section 6). In this case, we process the personal data for the purpose of carrying out the application procedure. If the application was successful, the applicant data will also be used to pay the agreed premium to the recommending person. This is done on the basis of Art. 6 (1) lit. f GDPR. We have a legitimate interest in recruiting new employees.

08. Use of WhatsApp and Superchat

As part of the application process, we may also contact applicants via the instant messaging service “WhatsApp”. For communication via WhatsApp, we use the service provider “Superchat” (SuperX GmbH, Prenzlauer Allee 242–247, 10405 Berlin, Germany) as a processor. Superchat facilitates the use of the WhatsApp Business API and provides additional functionalities. In connection with its use, the data processed includes, in particular, the applicant’s mobile phone number, message content, timestamps and, where applicable, documents submitted by the applicant.

WhatsApp may also be used during the application process to collect applicant information in a structured manner through automated question-and-answer dialogues and to support the application process. This may involve rule-based preliminary screening based on predefined, position-specific criteria. However, a final decision regarding the further course of the application process, in particular a rejection, is not made exclusively by automated means, but only after review by a responsible person. No automated individual decision-making within the meaning of Article 22 GDPR takes place. In particular, this process does not involve any AI-based assessment of suitability, scoring, ranking or automated overall assessment of applicants’ suitability.

Communication via WhatsApp may also result in metadata and content being processed by Meta Platforms Inc., 1601 Willow Road, Menlo Park, CA 94025, USA, including, in some cases, in third countries (e.g. the USA). WhatsApp processes this data independently, in particular to improve its services. Where personal data is transferred to third countries in connection with the use of WhatsApp or processing by Superchat, such transfers are carried out using appropriate safeguards in accordance with Chapter V GDPR, for example Standard Contractual Clauses (SCCs) or participation in the EU-US Data Privacy Framework. The use of WhatsApp is voluntary for applicants; alternative means of communication are available at all times.

The legal basis for the processing is Article 6(1)(a) and (f) GDPR. The legitimate interest lies in ensuring efficient and modern communication during the application process. Applicants may object to the processing at any time by emailing datenschutz@auto1.com.

09. Use of Google Gemini during job interviews

To enable us to focus our full attention on the applicant during the job interview, we use the digital note-taking tool “Google Gemini” in certain cases. The tool is provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, California 94043, United States of America. This enables the interview to be conducted without the distraction of taking notes manually, while at the same time ensuring that the course of the interview is accurately documented. Any transcripts created in this process are deleted no later than seven days after their creation.

The use of this tool is entirely voluntary. Before the tool is used during a job interview, the applicant is expressly asked for their consent at the beginning of the interview. The legal basis for this processing is the applicant’s express consent pursuant to Article 6(1)(a) GDPR. Consent may be

withdrawn at any time with effect for the future by emailing datenschutz@auto1.com. The tool will not be used during the interview without the applicant's express consent.

If the application process subsequently results in an employment relationship, additional personal data will be collected and processed to the extent necessary for the performance and administration of the employment relationship.

09. Rights of data subject

If you would like to exercise one of the rights mentioned in this section, you can send a message to the contact details mentioned in section 2 (e.g. by e-mail or letter) at any time.

a. Right to information

You have the right to information about the personal data stored about you in our company.

b. Right to rectification or erasure

You can have your personal data corrected and, under certain conditions, request the deletion of your data.

c. Right to restriction of processing

Under certain conditions, you can request the restriction of the processing of your data, e.g. if the accuracy of your data is disputed and should be verified by us.

d. Right to data portability

You have the right to receive personal data concerning you in a structured, commonly used and machine-readable format. Furthermore, you have the right to transfer the personal data directly to another controller, insofar as this is technically feasible and the rights and freedoms of other persons are not affected thereby.

e. Right to object

You can object to the processing of your data on the basis of our legitimate interests.

If you have given your consent to the processing of your data, you can revoke it at any time.

f. Right to appeal

You have the right to lodge a complaint with a supervisory authority if you believe that the processing of your personal data violates the GDPR. The supervisory authority responsible

for Autohero is the Berlin Commissioner for Data Protection and Freedom of Information,
Alt-Moabit 59-61, 10555 Berlin.

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