

## Jobs Flix - Privacy Policy for Applicants

In this Privacy Policy, you will be informed about how your personal data will be processed at the Flix Group (Flix) if you apply for a job advertised by us. Depending on the location of the Flix Group entity you're applying to, different rules apply. Please find the detailed description of data processing under the respective link below.

In our general privacy policy, we inform you about how we process your personal data when you visit the website in addition to topics not related to the application. Our general privacy policy applies in addition to this Privacy Policy for Applicants.

### Controller & data protection officer

The controller of the processing of your personal data is the company identified in the job advertisement (hereinafter referred to as "Flix" or "we").

Our group data protection officer is available to you at any time to answer all your questions and as a contact person on the subject of data protection:

Friedenheimer Brücke 16

80639 Munich – Germany

Email: [data.protection@flixbus.com](mailto:data.protection@flixbus.com)

For general questions about Flix, please contact [service@flixbus.de](mailto:service@flixbus.de).

For general questions about job postings or the application process, please contact [jobs@flixbus.com](mailto:jobs@flixbus.com).

**Please see the applicable privacy policy for the legal entity of the Flix Group you are applying to:**

- Legal entity within the **EU/EEA or UK (including Ukraine)**, please click [here](#)
- Legal entity in the **USA**, please click [here](#)
- Legal entity in **Brazil**, please click [here](#)
- Legal entity in **Mexico**, please click [here](#)
- Legal entity in **India**, please click [here](#)
- Legal entity in **Chile**, please click [here](#)
- Legal entity in **Türkiye**, please click [here](#)
- Legal entity in **Perú**, please click [here](#)
- Legal entity in **Australia**, please click [here](#)

## A. Privacy Policy for EU, EEA and UK

### 1. Collection of data

We collect and process the following categories of personal data as part of the application process:

- Personal master data and contact details in your candidate profile (e.g., first and last name, country, email address, phone number).
- Information provided by you as part of the application form (e.g., information on salary expectations, your motivation, work permit for the respective country, as well as disability information if applicable (if relevant for the advertised position)).
- Application documents (including, for example, resume, cover letter, professional development data, qualifications or language skills).
- Results of online procedures (e.g., performance tests) and video interviews, if applicable.
- Results of medical fitness examination (e.g. statement on suitability, necessity of a hearing or visual aid), if required by law.
- Document submission of ID or Visa Documents to verify the legal Eligibility to enter into an employment contract in the intended country of engagement (if necessary).
- Additional information and documents (such as references) if and to the extent that you provide them to us.

If and to the extent that performance tests are given, we evaluate the results using relevant reference groups, taking into account your profession and your level of experience.

We may also obtain the personal data about you listed above from other sources or from external business partners, such as HR service providers. This data may also originate, for example, from professional social networks where you have published it, e.g., LinkedIn. This may also involve data that you have provided us via third-party websites, e.g., job portals, or data that you have published in other publicly accessible sources. This data is limited to data that is relevant to your professional career and solely for the purpose of communicating job offers from our group of undertakings or aligning the accuracy of your information in the application documents.

### 2. Purposes of processing

We collect and process your personal data to be able to offer advertised positions and carry out the selection process. In this case, we process your personal data exclusively for the following purposes:

- To be able to identify you as an applicant.

- To take notes and make assessments to decide on suitability for the job.
- To initiate and establish an employment relationship.
- To contact you if you should be considered for an alternative position (depending on whether you give us your consent to do so).
- To ask you about your satisfaction with the application process, provided you have given us your consent for this.
- To contact you about your speculative application.
- To send you personalized information about open positions at Flix companies based on your consent.
- To save you in our talent pool for any other suitable job offers based on your previously granted consent.

If your application is successful, the application data transmitted by you to Flix will also be processed to complete the recruitment process, particularly to conclude an employment contract with you, as well as in connection with administrative matters related to your employment.

### 3. Legal bases

We process your personal data within the scope of the application process only to the extent permitted by an applicable legal provision, i.e. based on the provisions of the GDPR. In doing so, we will base the processing of your personal data on the following legal bases, among others:

- **For the decision on establishing the employment relationship:** Your personal data will be collected and processed in order to fill advertised positions and to carry out the selection process. We process your data primarily to establish the employment relationship on the basis of Art. 6 para. 1(b) GDPR. In addition, we take notes on the content of the interview using an application based on artificial intelligence, the legal basis is Art. 6 para. 1 (f) GDPR. Our legitimate interest is to fully focus on the interview with you and make well-informed hiring decisions. If you prefer that the notes be taken manually rather than by AI, you can object to the use of the AI Notetaker in the related email.
- **To fulfill legal obligations:** We process your data to fulfill legal obligations, e.g. in case the law requires the performance of medical fitness examination (on the basis of § 47 EOB, Triebfahrzeugführerschein-Verordnung (TfV) or Schrift 714 „Leitlinien für die Beurteilung der Betriebsdiensttauglichkeit in Verkehrsunternehmen“). This data processing is carried out on the basis of Art. 6 para. 1(c) GDPR.
- **Based on your consent:** If you voluntarily provide us with special categories of personal data, we will only process them on the basis of your consent. The legal basis for this is Art. 6 para. 1(a) GDPR.

If we have invited you to participate in a survey about your satisfaction with the application process at Flix, the relevant legal basis is your consent pursuant to Art. 6 para. 1 (a) GDPR. Your registration for the “Career Portal”, where you receive personalized information about current job postings at Flix, is also based on this legal basis.

If a performance test is planned for the respective position, participation in these tests is voluntary and requires your consent. You can decline to participate in such a test. The legal basis for this is Art. 6 para. 1(a) GDPR.

As part of the application process, we offer suitable applicants the option of being stored in our talent pool for a period of one year based on consent within the meaning of Art. 6 para. 1(a). This consent is voluntary and can be revoked at any time for the future.

- **To safeguard legitimate interests:** In individual cases, we process your data in order to protect legitimate interests of Flix or third parties. A legitimate interest exists, for example, if your data is required to assert, exercise or defend legal claims within the scope of the application process (e.g., claims under the General Equal Treatment Act). In these cases, the data processing takes place on the basis of Art. 6 para. 1 (f) GDPR. A legitimate interest is, for example, the need to provide evidence in proceedings.

If we use information from public profiles on professional social networks, the legal basis for the processing - creating a basis for the decision on establishing an employment relationship with you - shall be considered in our legitimate interests. The legal basis is Art. 6 para. 1(f) GDPR in conjunction with Art. 9 para. 2(e) GDPR.

Personal data that you provide during the application process is generally voluntary. However, it is necessary to provide this personal data for the processing of your application or the conclusion of an employment contract.

#### 4. Data recipients

Your personal data may be transmitted by us to affiliated companies, provided this is permitted within the framework of the purposes and legal bases set out above. After your application has been received, your applicant data will only be submitted to those offices that require them to carry out the application process. In addition to the company posting the job and the employees of the department that is hiring, these are generally also the responsible employees of the Human Resources Department of Flix SE.

Your personal data may also be processed on our behalf based on contracts pursuant to Art. 28 GDPR, in particular by system providers as part of applicant management or the completion of the application process. Personal data will not be transferred to third parties if there is no reference to applicant management and the applicant selection processes or outside of the purposes described in the “Purposes of processing” section.

Our Career Portal is technically implemented via the service provider Greenhouse Software, Inc., 110 Fifth Avenue, 3d Fl., New York, NY 10011 USA (hereinafter also referred to as “Greenhouse”). Greenhouse processes your data on our behalf as a processor. Your personal data will be transmitted to Greenhouse for the purposes of this processing. You can find further information regarding data protection and data security at the following links: <https://www.greenhouse.io/privacy-policy>, <https://www.greenhouse.io/security-and-performance>.

These transfers can therefore be transfers of personal data to recipients outside the European Union or the European Economic Area. We have concluded standard contractual clauses with these external service providers if they are not based in countries with adequacy decisions in accordance with Art. 45 GDPR. You can find further information under [“Data transfers outside the EU”](#).

In the case of a legal obligation, we reserve the right to disclose information about you if we are required to disclose it to lawfully acting authorities or law enforcement bodies; the legal basis is Art. 6 para. 1(c) GDPR.

## 5. Your rights

You may assert your rights as a data subject regarding your personal data at any time, in particular by contacting us using the contact details provided in Clause 1. According to the GDPR, you have the rights listed below:

### Right to information

You can request information in accordance with Art. 15 GDPR about your personal data processed by us. In your request for information, you should clarify your concern to make it easier for us to compile the necessary data. Upon request, we will provide you with a copy of the data that are the subject matter of the processing. Please note that your right to information may be limited under certain circumstances in accordance with statutory provisions.

### Right to rectification

If the information relating to you is not (any longer) correct, you may request a correction in accordance with Art. 16 GDPR. If your data is incomplete, you may request completion.

### Right to erasure

You may request the erasure of your personal data in accordance with the provisions of Art. 17 GDPR. Your right to erasure depends, among other things, on whether the data relating to you are still required by us to perform our statutory duties.

### Right to restriction of processing

In accordance with the provisions of Art. 18 GDPR, you have the right to demand a restriction of the processing of the data relating to you.

**Right to data portability**

In accordance with the provisions of Art. 20 GDPR, you have the right to receive the data that you have provided to us in a structured, commonly used and machine-readable format, or to request the transmission to another controller.

**Right to object**

**In accordance with Art. 21 para. 1 GDPR, you have the right to object to the processing of your data at any time for reasons relating to your particular situation. You can object to receiving advertising at any time with effect for the future, in accordance with Art. 21 para. 2 GDPR (objection to advertising in the case of direct marketing).**

**Right to appeal**

If you are of the opinion that we have not complied with the provisions of data protection regulations when processing your data, you can complain to a data protection supervisory authority about the processing of your personal data.

**Right to withdraw consent**

You can withdraw your consent to the processing of your data at any time with future effect.

**6. Storage/retention periods**

We store your personal data for a period of 6 months after sending the rejection for the respective position. This storage period is particularly necessary for cases in which we must fulfill obligations to provide evidence in proceedings under the General Equal Treatment Act (AGG) in Germany (or similar laws in other jurisdictions) or defend ourselves against any claims asserted.

If you have given your consent, we will store your data for this period in case there is another job posting you are a suitable candidate for.

You can request the erasure of your applicant data or the withdrawal of your application at any time by contacting us via email at: [jobs@flixbus.com](mailto:jobs@flixbus.com).

If you have consented to be included in our talent pool as part of the application process, your application documents will be processed in the talent pool solely within the framework of future job postings that could be suitable for you and will be destroyed after a period of one year at the latest.

In the event that your application is successful, we will store your personal data for the entire duration of your employment relationship in accordance with the Privacy Policy for Employees, which we will send you upon acceptance of employment.

## B. Privacy Policy for USA

### Flix North America Inc. Job Applicant Privacy Notice (“Job Applicant Notice”)

Effective Date: 9/11/2025

This Job Applicant Notice describes how Flix North America Inc. (“**Company**,” “**we**,” “**us**,” or “**our**”) processes personal information (“**PI**”) of our job applicants in the human resources (“**HR**”) context.

For California job applicants, this Job Applicant Notice is designed to meet obligations under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (together, the “**CCPA**”). In the event of a conflict between any other Company policy, statement, or notice and this Job Applicant Notice, this Job Applicant Notice will prevail as to our California job applicants, unless stated otherwise. Capitalized terms used but not defined in this Job Applicant Notice shall have the meanings given to them under the CCPA.

Section 1 of this Job Applicant Notice provides notice of our data practices, including our collection, use, retention, and disclosure of our job applicant PI. Section 2 of this Job Applicant Notice provide information regarding rights our California job applicants have under the CCPA and how you may exercise them.

**Non-Applicability:** This Job Applicant Notice does not apply to our consumer facing website(s), which are addressed in our general privacy notice available [here](#). Our other personnel, such as current and former employees and independent contractors, can learn about our data practices as relates to them by contacting [data.protection@flix.com](mailto:data.protection@flix.com) and can exercise their rights as set forth in section 2 of this Job Applicant Notice.

#### 1. NOTICE OF DATA PRACTICES

The description of our data practices in this Job Applicant Notice covers the twelve (12) months prior to the Effective Date and will be updated at least annually. Our data practices may differ between updates, however, if materially different from this Job Applicant Notice, we will provide supplemental pre-collection notice of the current practices, which may include references to other privacy policies, notices, or statements. Otherwise, this Job Applicant Notice serves as our notice at collection.

##### (a) PI Sources and Use

We may collect your PI directly from you when you apply for a position with us (e.g., contact details, educational and employment data), your devices; our affiliates; our service providers; public sources of data; professional social networks (e.g., LinkedIn), or third parties (e.g., references).

Generally, we use job applicant PI for HR Business Purposes and as otherwise related to the operation of our business, including for: Performing Services; Managing Interactions and Transactions; Security; Debugging; Quality Assurance; Processing Interactions and Transactions; and Research and Development. For example, we use job applicant PI for the following purposes:

- Recruitment (e.g., to include you in our talent pool for future job postings you could be suitable for);
- Running background checks;
- Maintaining personnel records;
- Sending personalized information about open positions;
- HR IT systems and security;
- Health & safety/occupational health; and
- Security (including electronic and of premises)

We may also use PI for “**Additional Business Purposes**” in a context that is not a Sale or Share under the CCPA, such as:

- Disclosing it to our Service Providers, Contractors, or Processors that perform services for us (“**Vendors**”);
- Disclosing it to you or to other parties at your direction or through your action (e.g., some software platform operators.);
- For the additional purposes explained at the time of collection (such as in the applicable privacy policy or notice);
- As required or permitted by applicable law;
- To the government or private parties to comply with law or legal process or protect or enforce legal rights or obligations or prevent harm;
- Where we believe we need to in order to investigate, prevent or take action if we think someone might be using information for illegal activities, fraud, or in ways that may threaten someone’s safety or violate our policies or legal obligations; and
- To assignees as part of an acquisition, merger, asset sale, or other transaction where another party assumes control over all or part of our business (“**Corporate Transaction**”).

Subject to restrictions and obligations under the CCPA, our Vendors may also use your PI for Business Purposes and Additional Business Purposes, and may engage their own vendors to enable them to perform services for us.



## (b) PI Collection, Disclosure, and Retention - By Category of PI

We collect, disclose, and retain PI as follows:

Category of PI	Examples of PI Collected and Retained	Categories of Recipients
1. Identifiers	First and last name, postal address, online identifier, Internet Protocol address, and e-mail address.	<b>Disclosures for Business Purposes:</b> <ul style="list-style-type: none"> <li>• Our affiliates</li> <li>• System and software vendors (e.g., data processor and storage provider, analytics provider, applicant management platform provider)</li> <li>• Governmental entities (for example, in relation to our obligations to determine employment eligibility and responding to requests pursuant to legal or regulatory process) and/or</li> <li>• Other parties (e.g., litigants) within the limits of Additional Business Purposes.</li> </ul> <b>Sale/Share:</b> None
2. Personal Records	Name, signature, address, and telephone number. Some PI included in this category may overlap with other categories.	<b>Disclosures for Business Purposes:</b> <ul style="list-style-type: none"> <li>• Our affiliates</li> <li>• System and software vendors (e.g., data processor and storage provider, analytics provider, applicant management platform provider)</li> <li>• Governmental entities (for example, in relation to our obligations to determine employment eligibility and responding to requests pursuant to legal or regulatory process) and/or</li> <li>• Other parties (e.g., litigants) within the limits of Additional Business Purposes.</li> </ul> <b>Sale/Share:</b> None
3. Personal Characteristics or Traits	In some circumstances, we may collect PI that is considered protected under U.S. law, such as disability related information (if relevant for an	<b>Disclosures for Business Purposes:</b> <ul style="list-style-type: none"> <li>• Our affiliates</li> <li>• System and software vendors (e.g., data processor and storage provider, analytics provider, applicant management platform provider) and/or</li> </ul>

Category of PI	Examples of PI Collected and Retained	Categories of Recipients
	advertised position).	<ul style="list-style-type: none"> <li>Other parties (e.g., litigants and government entities) within the limits of Additional Business Purposes.</li> </ul> <p><b>Sale/Share:</b> None</p>
4. Internet Usage Information	When you use our online systems or otherwise interact with us online, we may collect browsing history, search history, and other information regarding your interaction with our systems or other sites or content.	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>Our affiliates</li> <li>System and software vendors (e.g., data processor and storage provider, analytics provider, applicant management platform provider) and/or</li> <li>Other parties (e.g., litigants and government entities) within the limits of Additional Business Purposes.</li> </ul> <p><b>Sale/Share:</b> None</p>
5. Sensory Data	We may collect audio, video, or similar information such as during video interviews.	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>Our affiliates</li> <li>System and software vendors (e.g., data processor and storage provider, analytics provider, applicant management platform provider) and/or</li> <li>Other parties (e.g., litigants and government entities) within the limits of Additional Business Purposes.</li> </ul> <p><b>Sale/Share:</b> None</p>
6. Professional or Employment Information	Professional, educational, or employment-related information, such as resumes, cover letters, professional development data, qualifications, language skills, work history, references, prior employer, and	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>Our affiliates</li> <li>System and software vendors (e.g., data processor and storage provider, analytics provider, applicant management platform provider) and/or</li> <li>Other parties (e.g., litigants and government entities) within the limits of Additional Business Purposes.</li> </ul> <p><b>Sale/Share:</b> None</p>

Category of PI	Examples of PI Collected and Retained	Categories of Recipients
	results of online performance tests.	
7. Inferences from PI Collected	We may draw inferences from information we collect about you. For example, if performance tests are given, we evaluate the results using relevant reference groups, taking into account your profession and level of experience.	<b>Disclosures for Business Purposes:</b> <ul style="list-style-type: none"> <li>• Our affiliates</li> <li>• System and software vendors (e.g., data processor and storage provider, analytics provider, applicant management platform provider) and/or</li> <li>• Other parties (e.g., litigants and government entities) within the limits of Additional Business Purposes.</li> </ul> <b>Sale/Share:</b> None
8. Sensitive PI	Health Information (PI collected and analyzed concerning an individual's health, in particular, disability related info if relevant for an advertised position).	<b>Disclosures for Business Purposes:</b> <ul style="list-style-type: none"> <li>• Our affiliates</li> <li>• System and software vendors (e.g., data processor and storage provider, applicant management platform provider) and/or</li> <li>• Other parties (e.g., litigants and government entities) within the limits of Additional Business Purposes.</li> </ul> <b>Sale/Share:</b> None

There may be additional information we collect that meets the definition of PI under the CCPA but is not reflected by a category above, in which case we will treat it as PI as required but will not include it when we describe our practices by PI category.

Please note that we use an AI-supported application to take notes during candidate interviews. The AI, however, does not make automatic employment or hiring decisions. If you prefer that the notes be taken manually rather than by AI, you can object to the use of the AI Notetaker in the related email.

As permitted by applicable law, we do not treat deidentified data or aggregate consumer information as PI and we reserve the right to convert, or permit others to convert, your PI into deidentified data or aggregate consumer information, and may elect not to treat publicly available information as PI. We will not attempt to reidentify data that we maintain as deidentified.

Because there are numerous types of PI in each category of PI, and various uses for each PI type, our retention periods vary for each of the categories of PI described above. The length of time for which we retain each category of PI depends on the purposes for our collection and use and requirements pursuant to applicable laws. For example, where we send a rejection for a position, we may retain your PI for up to seven (7) years after sending the rejection to (a) comply with legal requirements or (b) subject to your right to make a deletion request, in connection with the reopening of the position you applied for or other positions you may be a suitable candidate for. The criteria used to determine the retention period of PI includes the nature and sensitivity of the PI, the potential risk of harm from unauthorized use or disclosure of the PI, as well as applicable laws (such as applicable statutes of limitation).

## **2. California Job Applicants Only**

### **(a) Your Rights and How to Exercise Them**

Our California job applicants have the same rights to know/access, delete, correct, and opt-out as traditional Consumers and may learn more about these rights and how to exercise them in Section 2 of our U.S. State Notice [here](#).

#### **Right to Limit Use and Disclosure of Sensitive PI**

With regard to PI that qualifies as Sensitive PI under the CCPA, we currently only Process Sensitive PI for purposes that are exempt from choice under the CCPA. However, at some point in the future, we may process Sensitive PI for purposes in which you may limit such Sensitive PI Processing. To exercise choice regarding such potential Processing, follow the instructions in our [Data Subject Rights Request Form](#).

### **(b) Non-Discrimination / No Retaliation**

We will not discriminate or retaliate against you in a manner prohibited by the CCPA for your exercise of your privacy rights.

### **(c) Notice of Financial Incentive Programs**

We do not currently offer discounts or rewards for providing us job applicant PI, or set price or service differences related to the collection, retention, sale, or sharing of PI. If we offer such programs in the future, we will update this Job Applicant Notice to describe such program(s), including how you may opt-in and how we value the PI required.

### **(d) Our Rights and the Rights of Others**

Notwithstanding anything to the contrary, we may collect, use and disclose your PI as required or permitted by applicable law and this may override your rights under the CCPA. In addition, we are not required to honor your requests to the extent that doing so would infringe upon our or another person's or party's rights or conflict with applicable law.

### 3. CONTACT US

If you have any questions, comments, or concerns about our job applicant privacy practices, please contact us by e-mail at [data.protection@flix.com](mailto:data.protection@flix.com). Please note that e-mail communications will not necessarily be secure; accordingly, you should not include sensitive information in your e-mail correspondence with us.

## C. Privacy Policy for Brazil

### 1. Collection and Purposes of the data processing

We, Flixbus Transporte e Tecnologia do Brasil LTDA., collect and process the following categories of personal data, under the terms of Federal Law No. 13.709/2018, the Brazilian General Data Protection Law (the “**LGPD**”), as part of the application process:

Personal data processed	Purpose of processing
<b>NAME AND CONTACT DETAILS IN YOUR CANDIDATE PROFILE</b> (e.g., first and last name, country, email address, phone number).	To be able to <b>identify</b> you as an applicant and to <b>contact</b> you about your speculative application. To <b>interview</b> you, and/or <b>involve you in a recruitment process</b> or contest and <b>validate your identity</b> . To ask you about your <b>satisfaction with the application process</b>
<b>INFORMATION PROVIDED BY YOU AS PART OF THE APPLICATION FORM</b> (e.g., information on salary expectations, your motivation, work permit for the respective country, as well as any disability information if applicable (if relevant for the advertised position)).	To <b>generate a labor file</b> , as applicable, and assess your profile for potential hiring. To send you <b>personalized information about open positions</b> at Flix companies. To <b>save you in our talent pool</b> for any other suitable job offers based on your previously granted consent. To <b>present</b> you with an <b>economic proposal and/or job offer</b> .
<b>APPLICATION DOCUMENTS</b> (including, for example, resume, cover letter, professional development data, qualifications or language skills).	To <b>generate a labor file</b> , as applicable, and assess your profile for potential hiring. To send you <b>personalized information about open positions</b> at Flix companies. To <b>save you in our talent pool</b> for any other suitable job offers based on your previously granted consent.
<b>RESULTS OF ONLINE PROCEDURES</b> (e.g., performance tests) and video interviews, if applicable.	To <b>generate a labor file</b> , as applicable, and assess your profile for potential hiring. To <b>save you in our talent pool</b> for any other suitable job offers based on your previously granted consent.

<b>ADDITIONAL INFORMATION AND DOCUMENTS</b> (such as references) if and to the extent that you provide them to us.	To <b>initiate</b> and <b>pursue</b> an <b>employment relationship</b> .
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If and to the extent that performance tests are given, we evaluate the results using relevant reference groups, considering your profession and your level of experience.

We may also obtain the personal data about you listed above from other sources or from external business partners, such as HR service providers. This data may also originate, for example, from professional social networks where you have published it, e.g., LinkedIn. This may also encompass data that you have provided us via third-party websites, e.g., job portals, or data that you have published in other publicly accessible sources. This data is limited to the data that is relevant to your professional career and solely for the purpose of communicating job offers from our group of undertakings or aligning the accuracy of your information in the application documents.

If your application is successful, the application data transmitted by you to Flix will also be processed to complete the recruitment process, particularly to conclude an employment contract with you, as well as in connection with administrative matters related to your employment.

If you are approved in the selection process and hired by Flix, the processing of their personal data will be fully governed by the Privacy Policy for Employees.

At Flix, we may use ARTIFICIAL INTELLIGENCE (AI) tools in the processing of personal data to enhance our selection process, always in compliance with our legal and regulatory obligations and the commitments set forth in this Privacy Policy for Applicants. If you prefer that the notes be taken manually rather than by AI, you can object to the use of the AI Notetaker in the related email.

## 2. Lawful bases

We process your personal data within the scope of the application process only to the extent permitted by an applicable legal provision, i.e. based on the provisions set forth in the LGPD. In doing so, we may process your personal data based in one or more of the following lawful bases:

- **To establish an employment relationship:** Your personal data may be collected and processed to fill advertised positions and to carry out the selection process. We may process your data primarily to establish the employment relationship based on Art. 7, V, LGPD.
- **To fulfill legal obligations:** We may process your data to comply with legal or regulatory requirements. For example, we are legally obliged to provide government

bodies with information about you and your employment relationship. This data processing is carried out based on Art. 7, II, LGPD.

- **Based on your consent:** In certain circumstances, especially when we need to process sensitive personal data of your, we may need your consent prior to this processing. The lawful bases for this can be found in Art. 7, I, and in Art. 11, II, a, of the LGPD.

If we have invited you to participate in a survey about your satisfaction with the application process at Flix, the correspondent lawful basis is your consent pursuant to Art. 7, I, LGPD. Your registration for the “Career Portal”, where you receive personalized information about current job postings at Flix, is also based on this legal basis.

If a performance test is planned for the respective position, participation in these tests is voluntary and requires your consent. You can decline to participate in such a test. The lawful basis for this is Art. 7, I, LGPD.

As part of the application process, we offer suitable applicants the option of being stored in our talent pool for a period of one year based on consent within the meaning of Art. 7, I, LGPD. This consent is voluntary and can be revoked at any time for the future, according to Art. 8, §5, LGPD.

- **To safeguard the regular exercise of rights in judicial, administrative or arbitration proceedings:** in certain cases, we may process your data for purposes of asserting, exercising or defending Flix against any legal claims within the scope of the application process. The lawful basis for this is Art. 7, VI, LGPD
- **Based on our or third-party's legitimate interests:** We may process your personal data to pursue our legitimate interests, provided that such interests do not override your fundamental rights. For example, we may use your contact information to communicate important updates about company policies or changes in employment terms, which is justified under Art. 7, IX, LGPD.

Personal data that you provide during the application process is generally voluntary. However, it is necessary to provide this personal data for the processing of your application or the conclusion of an employment contract.

### 3. Data recipients

Your personal data may be transmitted by us to our headquarters, Flix SE, or affiliated companies, provided this is permitted within the framework of the purposes and lawful bases set out above. After your application has been received, your applicant data will only be submitted to those offices that require them to carry out the application process. In addition to the company posting the job and the employees of the department that is hiring, these are generally also the responsible employees of the Human Resources Department of Flix SE.



Your personal data may also be processed on our behalf based on contracts pursuant to Art. 39 LGPD, by system providers as part of applicant management or the completion of the application process. Personal data will not be transferred to third parties if there is no reference to applicant management and the applicant selection processes or outside of the purposes described in item 1 above **“Collection and Purposes of the data processing”**.

Our Career Portal is technically implemented via the service provider Greenhouse Software, Inc., 110 Fifth Avenue, 3d Fl., New York, NY 10011 USA (hereinafter also referred to as “Greenhouse”). Greenhouse processes your data on our behalf as a processor. Your personal data will be transmitted to Greenhouse for the purposes of this processing. You can find further information regarding data protection and data security at the following links: <https://www.greenhouse.io/privacy-policy>, <https://www.greenhouse.io/security-and-performance>.

As these transfers may involve the transfer of personal data to recipients outside Brazil, we have taken (and still take) measures to ensure that third countries receiving the data provide a level of personal data protection adequate to that provided in the LGPD; or will adopt guarantees and safeguards, such as specific clauses, standard contractual clauses, global corporate rules, among others; or will request the specific consent of the data subject, when applicable; or will observe and comply with the other legally authorized instances.

In the case of a legal obligation, we reserve the right to disclose information about you if we are required to disclose it to lawfully acting authorities or law enforcement bodies; the legal basis is Art. 7, II, LGPD.

#### 4. Your rights

You may assert your rights as a data subject regarding your personal data at any time, by contacting us using the contact details provided in this section.

According to the Art. 18 of the LGPD, you have the rights listed below:

1. **Request confirmation that FlixBus processes** your personal data. If you are unsure and would like to know if we process your personal data, you can submit such request to us.
2. **Request access** to the data we have about you; for example, to find out what resume we have stored or what information is in our selection systems and to confirm the existence of the processing of your data.
3. **Update and correct** incomplete, inaccurate, or outdated data we have about you; for example, to include new information about your professional qualifications.
4. **Request the anonymization, blocking, or deletion** of unnecessary, excessive, or improperly processed data in accordance with the provisions of the LGPD.
5. **Port your data** to another service or product provider, in compliance with applicable regulations and trade and industrial secrets.

6. **Request the deletion** of personal data processed based on your consent, except when retaining the data is necessary or permitted by law
7. **Request information** from public and private entities with which we **share data**.
8. **Request information** about the **possibility of not providing consent**, as well as information about the consequences in case of refusal to provide such consent
9. **Withdraw any consent** you may have given at any time and without any cost, by means of an express manifestation.

You can submit your request or any other questions pertaining the processing of your personal data to our Data Protection Officer, who is available at any time to answer all your questions and as a contact person on the subject of data protection.

Her contact details are:

Salime Saade

Flixbus Transporte e Tecnologia do Brasil Ltda.

Rua Conceição de Monte Alegre, no 107, 10th Floor, Conjunto 101 Torre B, CV 3501,

São Paulo - SP

Email: [data.protection.br@flixbus.com](mailto:data.protection.br@flixbus.com)

## 5. Storage/retention periods

We store your personal data for a period of 6 months after sending the rejection for the respective position. This storage period is particularly necessary for audit purposes, compliance with legal or regulatory obligations, regular exercise of Flix's rights, or for the necessary duration according to the lawful basis that justifies the retention of the data.

If you have given your consent, we will store your data for this period in case there is another job posting you are a suitable candidate for.

You can request the deletion of your applicant data or the withdrawal of your application at any time by contacting us via email at: [jobs@flixbus.com](mailto:jobs@flixbus.com).

If you have consented to be included in our talent pool as part of the application process, your application documents will be processed in the talent pool solely within the framework of future job postings that could be suitable for you and will be destroyed after a period of one year at the latest.

In the event that your application is successful, we will store your personal data for the entire duration of your employment relationship in accordance with the Privacy Policy for Employees, which we will send you upon acceptance of employment.

## D. Privacy Policy for Mexico

### 1. Identity and Address of the Data Controller.

Flix Latam, S.A. de C.V. (Flix Latam), or Flixbus Mexico, S.A. de C.V. (Flixbus Mexico) as applicable, both subsidiary/ sister company of Flix, Flix Latam a company based at Montes Urales 424, 03A-103 y 03A-102, Lomas de Chapultepec V Sección, Miguel Hidalgo, Ciudad de México, 11000, Mexico and Flixbus Mexico a company based at Montes Urales 424, 03A-103G, Lomas de Chapultepec V Sección, Miguel Hidalgo, Ciudad de México, 11000, Mexico , acts as the data controller as applicable, and thus is responsible for the collection, use, storage, and disclosure of your personal data, in accordance with the provisions of this notice, ensuring at all times the proper use, protection, and confidentiality thereof, and observing the principles of legality, consent, information, quality, purpose, loyalty, proportionality and responsibility as provided by the Federal Law on the Protection of Personal Data Held by Private Parties, its Regulations and the Privacy Notice Guidelines (hereinafter referred to as the “Legislation”).

### 2. Personal data subject to Processing.

In order to carry out the purposes described in this notice, as well as to enforce the rights and comply with the obligations within the framework of the potential employment relationship with each data subject, Flix may collect and process, in whole or in part, the following categories of personal data:

1. Personal master data and contact data of yourself and third parties who act as your personal references and/or emergency contacts: full name; date and place of birth; nationality, as well as documentation required within the framework of migration laws (citizenship, passport, residence or work permit, among others); marital status; address; tax data and social security number. Identification of family members and contact information required for the management of beneficiaries, relatives and economic dependents. Contact information to identify and contact certain individuals in case of emergency.
2. Information provided by you as part of the application form: landline phone; cell phone and e-mail, Details contained in your job application and resume, school transcripts, education history, professional qualifications; curricular information including the name of the schools and/or colleges where the employee studied.
3. Employment data, application documents relevant to your candidacy, and results of online procedures and video interviews, if applicable.
4. Academic data included in the application form
5. Financial and economic data related to the application form.

The items mentioned above represent categories of personal data that Flix collects and processes through job application forms, resumes, cover letters, video interviews, and other

sources, including external business partners like HR service providers. Additionally, this data may originate from professional social networks where you have shared it, such as LinkedIn. It may also include information you provided through third-party websites, such as job portals, or data published in other publicly accessible sources. The collection of this information is limited to what is necessary to establish a potential employment relationship.

At Flix, we may use artificial intelligence (AI) tools to support the processing of personal data for purposes related to enhance our selection process. Such processing is not carried out exclusively through automated means, as human intervention is always ensured. Consequently, no decision that may produce legal effects or significantly affect applicants is made without prior human review, in strict compliance with applicable legal and regulatory obligations, as well as with the commitments set forth in this Privacy Policy for Applicants.

The personal data that we may request and collect from you will be processed under the strictest physical, technical, and administrative security measures, that ensure their protection and confidentiality once we obtain your Consent.

### **3. Sensitive Personal Data.**

In addition to the personal data mentioned above, for the purposes stated in this privacy notice, we will use the following sensitive personal data that requires special protection:

- Disability information, if applicable: social security certificate of health status, as well as medical data necessary to compile your medical file (including disabilities and technical assistance, anti-doping results, traumatic events, work relationship and work environment, and union membership.
- Financial information: banking data; data related to beneficiaries and economic dependents; records and references from previous employment; and image and voice in photograph and/or video (which may be collected by surveillance systems); As well as socioeconomic information, remuneration, information on possession of securities and/or benefits and information for payroll and other benefits.
- Video Surveillance: You may be videotaped by Flix's security cameras. The images and sounds captured by the video surveillance cameras will be used for your security and the security of our facilities.

### **4. Purposes of the Processing of Personal Data.**

Flix may process your personal data for various primary purposes, which are those necessary for advertised positions and for establishing contact related to a potential employment opportunity with Flix and, unless you expressly object, for the secondary purposes listed here, which are those that, although not essential or necessary for the advertised positions and selection processes, would enable us to send personalized information about other job opportunities and enhance our overall interaction with job applicants.

*Primary Purposes:*

- Generate a labor file, as applicable, and assess your profile for potential hiring.
- Identify you as an applicant; contact you, interview you, and/or involve you in a recruitment process or contest, validate your identity, skills, and capacities, and request personal and work references.
- Create a profile in our records and database appropriate to the potential employment relationship with Flix.
- Contact you regarding your speculative application.
- Contact you if you are considered for an alternative position.
- Initiate and pursue an employment relationship.
- Present you with an economic proposal and/or job offer.
- In case of being a foreigner, to comply with the requirements of the National Immigration Institute, as well as to carry out immigration procedures and/or revocation of the corresponding immigration permits.
- Compliance with legal and conventional obligations, including the corresponding registration with the IMSS and INFONAVIT.
- Application of questionnaires in compliance with Flix's labor-management obligations, including, but not limited to, those related to NOM-035-STPS-2018.
- Implementation of inclusion policies, as well as the Protocol to Prevent Gender-Based Discrimination and Address Cases of Violence and Sexual Harassment, as well as to Eradicate Forced and Child Labor, always in compliance with the Federal Labor Law and the Federal Law to Prevent and Eliminate Discrimination.
- Internal audits, including, but not limited to, the Company's internal investigation processes, as well as compliance procedures in accordance with the policies implemented for such purposes.
- Administration of payroll services, including salary movements, overtime payments and other economic benefits.

*Secondary Purposes:*

- Send you internal communications from Flix that may be of interest to you and are not strictly related to your job position.
- Inquire about your satisfaction with the application process.
- Retain your information in our talent pool for any future suitable job opportunities.

- Send you personalized information about open positions at Flix.

In this regard, unless you expressly indicate otherwise, we understand that you consent to Flix processing your personal data for the purposes described above as applicable. In cases where explicit consent is required for financial, economic, or sensitive data, Flix will implement the necessary measures to obtain it in accordance with the relevant Legislation.

Nevertheless, you have the right to limit the use and disclosure of your personal data for commercial prospecting, advertising, and marketing purposes (*Secondary Purposes*). To do so, you may inform us via email at: [data.protection@flixbus.com](mailto:data.protection@flixbus.com) or by sending a written request to our address located at: Flix Latam: Montes Urales 424, 03A-103 y 03A-102 , Lomas de Chapultepec V Seccion, Miguel Hidalgo, Ciudad de México, 11000, Mexico and Flixbus Mexico at Montes Urales 424, 03A-103G, Lomas de Chapultepec V Sección, Miguel Hidalgo, Ciudad de México, 11000, Mexico.

- Name(s) and surname(s) of the applicant.
- Address of the applicant.
- Telephone, email, or other means to communicate the response to your request.
- Official identification proving your identity or, if applicable, legal representation.
- A clear and precise description of the secondary purposes for which you want to limit the Processing of Personal data.

Flix will respond to your request within twenty (20) business days.

We inform you that your Personal Data, Sensitive Personal Data and/or financial or patrimonial data will be safeguarded under strict administrative, physical and technical security measures, which have been implemented, in terms of the provisions of the Law in order to protect your data against any damage, loss, alteration, destruction or unauthorized use, access and treatment, as well as to limit, as far as possible, any risk that may arise. Your personal data will not be processed for marketing, advertising or commercial prospecting purposes.

## 5. Transfers and Disclosures of Personal Data.

Your personal data may be transmitted to affiliated companies. After your application has been received, your applicant data will only be submitted to those offices that require them to carry out the application process. In addition to the company posting the job and the employees in the hiring department, this data is generally also shared with the employees responsible for the Human Resources Department at Flix SE. As an exception authorized by the Legislation, we may transfer your personal data among sister companies, subsidiaries, and any entity that is part of Flix without your consent.

Flix may also engage one or more external third parties as service providers to facilitate and enhance our operations. In such case, these third parties will have access to your personal

data, acting as data processors, meaning they may handle and process your personal data solely under our instructions and supervision, aligned with this Notice. Personal data will not be transferred to third parties if there is no reference to applicant management and the applicant selection processes or outside the purposes described in the "Purposes of the Processing of Personal data" section. By not expressing your opposition to the aforementioned transfers of your personal data, it will be understood that you have granted your consent for this.

In the case of a legal obligation, we reserve the right to disclose information about you if we are required to disclose it to lawfully acting authorities or law enforcement bodies.

## 6. Mechanisms to Object the Processing of Your Personal Data.

We remind you that the aforementioned *primary purposes* are necessary and essential to maintain the potential employment relationship between you and Flix, as well as to secure continuous contact with you as a job applicant. Therefore, you cannot object to or refuse Flix from processing your personal data for such *primary purposes*.

If, despite the above, you object to Flix processing your personal data for *primary purposes*, we inform you that we will be unable to proceed with our potential employment relationship, and your selection process may be terminated.

In the event you do not want your personal data to be processed for any or all of the *secondary purposes*, you can object to it at any time by sending an email to our personal data department via the following means: [data.protection@flixbus.com](mailto:data.protection@flixbus.com) or by sending a written request to our address: Montes Urales 360, Lomas de Chapultepec II Sección, 11000 Ciudad de México

## 7. Exercise of your rights

At any time, you may exercise the following rights regarding the personal data we process about you:

### Right to Access.

Request Information about your personal data process by Flix. You can ask how we use them, and the conditions of their use.

### Right to Rectification.

Request any correction of your personal data if they are outdated, inaccurate or incomplete.

### Right to Cancellation.

You may request the deletion of your personal data from our records or database if you believe it is not being used properly, or if you consider it excessive or unnecessary for the purposes for which it was collected and processed. However, your request may be denied if the data is still necessary for us to fulfill primary purposes or per the Legislation.



## Right to Oppose

Oppose to the processing of your personal data for specific or secondary purposes for any legitimate reason.

To exercise these rights (collectively known as "**ARCO Rights**"), you must request and send a petition to our personal data department through email to our electronic address at : [data.protection@flixbus.com](mailto:data.protection@flixbus.com) or by sending a written request to our address: Flix Latam: Montes Urales 424, 03A-103 y 03A-102 , Lomas de Chapultepec V Seccion, Miguel Hidalgo, Ciudad de México, 11000, Mexico and Flixbus Mexico at Montes Urales 424, 03A-103G, Lomas de Chapultepec V Sección, Miguel Hidalgo, Ciudad de México, 11000, Mexico.

This request and petition must contain:

1. Name(s) and surname (s) of the applicant.
2. Address of the applicant.
3. Telephone, email, or other means to communicate the response to your request.
4. Official identification that proves your identity or, if applicable, the legal representation of the person acting on your behalf.
5. A clear and precise description of the personal data for which you seek to exercise any of the ARCO Rights.
6. The reasons why you request to exercise the respective ARCO Right(s).
7. In the case of rectifications, indicate the modifications to be made and the documentation supporting these changes.
8. Any other element that facilitates the location of the personal data.

Once we receive your request, we will have a period of twenty (20) business days to issue and inform you of our response. If your request is successful, it will be effective within a maximum period of fifteen (15) business days after the date of the response to your request. These deadlines may be extended only once, for equal periods, respectively, in which case we will inform you so.

For any questions regarding the procedures for exercising your ARCO Rights and/or for any questions about this Notice and our personal data protection practices, you can contact our personal data department at any time via email : [data.protection@flixbus.com](mailto:data.protection@flixbus.com) or to our address: Flix Latam: Montes Urales 424, 03A-103 y 03A-102 , Lomas de Chapultepec V Seccion, Miguel Hidalgo, Ciudad de México, 11000, Mexico and Flixbus Mexico at Montes Urales 424, 03A-103G, Lomas de Chapultepec V Sección, Miguel Hidalgo, Ciudad de México, 11000, Mexico.



## 8. Storage

We store your personal data for a period of 6 months after sending the rejection for the respective position. This storage period is particularly necessary for cases in which we must defend ourselves against any claims asserted.

If you have consented to be included in our talent pool as part of the application process, your application documents will be processed in the talent pool solely within the framework of future job postings that could be suitable for you and will be destroyed after a period of one year at the latest.

In the event that your application is successful, we will store your personal data for the entire duration of your employment relationship in accordance with the Privacy Policy for Employees, which we will send you upon acceptance of employment.

## 9. Means to Revoke the Consent.

At any time, you can revoke the consent granted to Flix for the processing of your personal data by sending a written request to our personal data department at : [data.protection@flixbus.com](mailto:data.protection@flixbus.com) or by sending a written notification to our address located at: Flix Latam: Montes Urales 424, 03A-103 y 03A-102 , Lomas de Chapultepec V Seccion, Miguel Hidalgo, Ciudad de México, 11000, Mexico and Flixbus Mexico at Montes Urales 424, 03A-103G, Lomas de Chapultepec V Sección, Miguel Hidalgo, Ciudad de México, 11000, Mexico.

Under no circumstances shall the revocation of your Consent have a retroactive effect on the date on which it becomes effective.

We ask you to consider that if you revoke the consent you granted to Flix for processing your personal data, we may be unable to continue with our potential employment relationship. In such a case, Flix may choose to terminate your application process. However, in accordance with applicable legislation, we may retain your personal data in our databases until all statutes of limitations for exercising any rights or enforcing any obligations related to the potential employment relationship have expired.

## 10. Use of Tracking Technologies on Our Website and Links to External Sites.

We hereby inform you that the website we operate and manage for Flix uses cookies, which are data files stored on a user's computer hard drive or electronic communications device while browsing a specific website. These cookies facilitate the exchange of information between the site and the user's browser. Through this information, we can monitor your behavior as an internet user and provide you with an improved service and user experience while navigating our site.

Flix does not obtain personal data through this technology; it only tracks browsing preferences to provide better service.

In some cases, you can partially or fully reject the collection and processing of cookies by Flix through the pop-up window that appears when you visit our website, selecting those cookies you authorize and those you do not, or denying all of them.

However, if this option is unavailable, cookies can be disabled in the browser settings you use. In most browsers, cookies can be disabled as follows:

1. Open your preferred browser.
2. Click or tap the **TOOLS** button; in some browsers, this option may appear as **SETTINGS**, then click or tap **Internet Options**.
3. Click or tap the **PRIVACY** tab, then in **Settings**, move the slider all the way to block all cookies or all the way down to allow all cookies (INTERNET EXPLORER); in some browsers, only one option to enable or disable cookies may appear.

For your convenience, you can learn more about cookies at the following website: <https://allaboutcookies.org/> and/or consult the steps to follow depending on the browser you use.

Finally, it is possible that our website contains links to external sites or platforms managed by third parties, over which Flix has no influence or control. In this regard, Flix assumes no responsibility for the personal data you may provide to such third-party websites, so we recommend that you always review the relevant Privacy Notices and practices.

## 11. Modifications to Privacy Notice.

We reserve the right to make modifications or updates to this Notice at any time, to address legislative changes or internal policies. In the event of any change to this Notice, we will communicate it through the website [Privacy Policy - Flix Career](#) and by direct communication sent to the contact information you have provided us.

Latest Update: September 2025

## E. Privacy Policy for India

FlixBus India Pvt. Ltd., (CIN: U72100HR2020FTC119328) a company incorporated under the Companies Act, 2013, having its registered office at We Work, 5th Floor, DLF Two Horizon Centre, DLF Phase 5, Sector 43, Gurugram – 122002, India-

(“FlixBus”) is engaged in the business of providing access to inter-city passenger transportation services via high capacity vehicles (“Buses”). This Privacy Policy applies to any websites, software technology based media and/or mobile applications which are under the ownership, control and/or may be licensed to FlixBus India Pvt. Ltd. (collectively referred to as the “FlixBus Platform”).

This Privacy Policy describes the information we collect from you via the FlixBus Platform and what happens to that information. Any changes to this Privacy Policy will be intimated to you through the FlixBus Platform. For avoidance of doubt the term “you” in this Privacy Policy includes you as an individual as well as any company/organization/body corporate/association of persons whom you represent or on whose behalf you may be acting. Your use of the FlixBus Platform indicates your explicit consent to the terms of this Privacy Policy including any changes made hereto. If you are accessing the FlixBus Platform on behalf of a company/organization/body corporate/association of persons, you represent and warrant that you have the express authorization of said company/organization/body corporate/association of persons to act on their behalf and accept the terms of this Privacy Policy on their behalf.

### 1. Information Collection

We may collect information including but not limited to the following about you and your use of the FlixBus Platform in order to create a better, more personalized experience for you or for internal research purposes: Your name, email address, address, date of birth, telephone number, a password selected by you, and data that may be selected or entered by you through the FlixBus Platform. Furthermore, we may collect your payment and financial information which will be stored by our third party payment processors.

We may track certain information about users of the FlixBus Platform including but not limited to Internet Protocol (IP) addresses, browser type, Internet Service Provider (ISP), referring/exit pages, click patterns, etc.), your mobile device’s unique ID number, your mobile device’s geographic location while the FlixBus Platform is running, your computer’s IP address, technical information about your computer or mobile device (such as type of device, web browser or operating system), your preferences and settings (time zone, language, privacy preferences, product preferences, etc.), the URL of the last web page you visited before coming to one of our sites, the buttons, controls and ads you clicked on (if any), how long you used the Platform.

## 2. Use of Information

You agree that we may use your information in the following ways:

- to provide our services to you,
- to enable us to create a better, more personalized experience for you based on your individual usage habits, analyze usage of the FlixBus Platform and disclose aggregated statistics, improve our content and service offerings, aid in our monetization efforts, and customize our Platform's content, layout and services. This may include migrating your information to other platforms owned by us. We also use the information we collect about you to review and investigate your activities or transaction on the FlixBus Platform, resolve disputes, troubleshoot problems, and enforce the agreements/terms of service that govern the provision of our services to you.

We may use your correspondence with us, information posted by you for publication on the FlixBus Platform for promotional, sales or any use that we consider appropriate, whether submitted via email, or posted on the FlixBus Platform.

We may share your information with third party partners or third parties hired by us to perform functions and provide services to us subject to confidentiality obligations consistent with this Privacy Policy and on the condition that the third parties use your information only on our behalf and pursuant to our instructions.

We may disclose any information in response to a legal request such as a subpoena, court order, or government demand, to investigate or report illegal activity, or to enforce our rights or defend claims. We may also transfer your information to another company in connection with a partnership or a corporate restructuring, such as a sale or merger.

## 4. Transmission to authorities

If you are travelling into the Schengen area, we are obliged to transmit your ID data (first and last name, gender, date of birth, citizenship, country of residence, document type and number) to the responsible EU authority in advance, which will check the legitimacy of your entry. If you do not provide the required data, entry into the Schengen area may be refused. The data will be deleted after transmission. The legal basis for the collection and transmission of the data is Art. 6 para. 1 lit. c GDPR.

## 5. Storage

By using the FlixBus Platform, you agree that your personal information may be stored by us and, if required, transferred to our affiliates anywhere in the world and you agree to the information collection, use, and sharing practices described in this Privacy Policy.

## 6. Security

We have established both physical and electronic procedures to safeguard and secure the information we collect. However, the internet is an open system, and we can make no guarantees as to the security or privacy of your information submitted to the FlixBus Platform. For this reason, we recommend that you use anti-virus software, routine checks, firewalls, and other precautions to protect yourself from security and privacy threats.

## 7. Third Party Websites

The FlixBus Platform may contain links to other websites that we believe may be of interest or use to you. We provide these links solely as a convenience to you. Links may also be posted by other users of the FlixBus Platform. When accessing a third-party website through the FlixBus Platform, you acknowledge that you are aware that these third-party websites are not screened for privacy or security issues by us. Please note that our Privacy Policy and information collection, use, and sharing procedures do not apply to other websites. We take no responsibility for and incur no liability for other websites' collection, use, or sharing of information. Please review the privacy policies provided by each website linked to the FlixBus Platform to familiarize yourself with the procedures of such websites. Please be aware that this Privacy Policy, and any other policies in place, in addition to any amendments, do not create rights enforceable by third parties.

## 8. Law Enforcement

You understand that we may disclose your information to authorities if compelled to by a court order or by an investigating agency/regulatory body in the lawful exercise of the powers conferred on such investigating agency/regulatory body. Additionally, you understand that we may disclose your information if we reasonably believe that you have breached laws of India, or international laws or the agreements/terms of service that govern the provision of our services to you or this Privacy Policy. We are under no obligation to inform you of any disclosures or potential disclosures of your information as mentioned in this paragraph. You release us from any claims for damages that may arise from or relate to the release of your information in compliance with a court order or a request made by an investigating agency/regulatory body. We may release your information under the conditions listed in this paragraph whether it is to individuals or entities and to any state or national authorities, as required.

## 9. Commercial and Non-Commercial Communications

If you decide to provide us with your contact information, you agree that we may send you communications and emails. However, you may unsubscribe from certain communications by notifying us that you no longer wish to receive such communications. Once notified, we will endeavour to remove you from our database immediately.

## 10. Third-Party Access to Your Information

Throughout the course of the provision of our services to you through the FlixBus Platform, we may delegate our authority to collect, access, use, and disseminate your information. It is therefore necessary that you grant the third parties we may use in the course of our business the same rights that you afford us under this Privacy Policy. For this reason, you hereby agree that for every authorization which you grant to us in this Privacy Policy, you also grant to any third party that we may hire, contract, or otherwise retain the services of, for the purpose of providing our services to you or for operating, maintaining, repairing, or otherwise improving or preserving our Platform or its underlying files or systems. As we do not control these third parties, you agree that we shall not be liable for the actions of any of these third parties, even if we would normally be held vicariously liable for their actions, and that you must take legal action against them directly should they commit any tort or other actionable wrong against you.

## 11. Cookies and Tracking

We may use cookies and other tracking mechanisms through the FlixBus Platform to identify you and remember your preferences.

## 12. Amendments

We may amend this Privacy Policy from time to time. When we amend this Privacy Policy, you must agree to the amendments as a condition of your continued use of our Platform. If you do not agree, you must immediately cease using the FlixBus Platform and notify us of your refusal to agree by reaching out to us at [india@flixbus.com](mailto:india@flixbus.com).

## F. Privacy Policy for Chile

### 1. Collection of data

We collect and process the following categories of personal data as part of the application process in accordance with Chilean data protection law, currently Law No. 19.628 and, as of December 1, 2026, Law No. 21.719:

- Personal master data and contact details in your candidate profile (e.g., first and last name, country, email address, phone number).
- Information provided by you as part of the application form (e.g., information on salary expectations, your motivation, work permit for the respective country, as well as disability information if applicable (if relevant for the advertised position)).
- Application documents (including, for example, resume, cover letter, professional development data, qualifications or language skills).
- Results of online procedures (e.g., performance tests) and video interviews, if applicable.
- Additional information and documents (such as references) if and to the extent that you provide them to us.

If and to the extent that performance tests are given, we evaluate the results using relevant reference groups, taking into account your profession and your level of experience.

We may also obtain the personal data about you listed above from other sources or from external business partners, such as HR service providers. This data may also originate, for example, from professional social networks where you have published it, e.g., LinkedIn. This may also involve data that you have provided us via third-party websites, e.g., job portals, or data that you have published in other publicly accessible sources. This data is limited to data that is relevant to your professional career and solely for the purpose of communicating job offers from our group of undertakings or aligning the accuracy of your information in the application documents.

### 2. Purposes of processing

We collect and process your personal data to be able to offer advertised positions and carry out the selection process. In this case, we process your personal data exclusively for the following purposes:

- To be able to identify you as an applicant.
- To initiate and establish an employment relationship.
- To contact you if you should be considered for an alternative position (depending on whether you give us your consent to do so).

- To ask you about your satisfaction with the application process, provided you have given us your consent for this.
- To contact you about your speculative application.
- To send you personalized information about open positions at Flix companies based on your consent.
- To save you in our talent pool for any other suitable job offers based on your previously granted consent.

If your application is successful, the application data transmitted by you to Flix will also be processed to complete the recruitment process, particularly to conclude an employment contract with you, as well as in connection with administrative matters related to your employment.

### 3. Legal bases

We process your personal data within the scope of the application process only to the extent permitted by an applicable legal provision, i.e. based on the provisions of the 19.628 law about protection of personal life and, as of December 1, 2026, Law No. 21.719 on the Protection and Processing of Personal Data. In doing so, we will base the processing of your personal data on the following legal bases, among others:

- For the decision on establishing the employment relationship: Your personal data will be collected and processed in order to fill advertised positions and to carry out the selection process. We process your data primarily to establish the employment relationship on the basis of these provisions.
- To fulfill legal obligations: We process your data to fulfill legal obligations. For example, we are legally obligated to ensure to keep your data private and take care of them with due diligence. Furthermore, we also need your data, among other things, if you exercise your rights with us as a data subject in accordance with regulation.
- Based on your consent: If you voluntarily provide us with special categories of personal data, we will only process them on the basis of your consent.

If we have invited you to participate in a survey about your satisfaction with the application process at Flix, the relevant legal basis is your consent. Your registration for the “Career Portal”, where you may receive personalized information about current job postings at Flix, is also based on this legal basis.

If a performance test is planned for the respective position, participation in these tests is voluntary and requires your consent. You can decline to participate in such a test. The legal basis for this is Art. 4 of 19.628 law.



As part of the application process, we offer suitable applicants the option of being stored in our talent pool for a period of one year based on consent within the meaning of Art. 4 of 19.628 law. This consent is voluntary and can be revoked at any time for the future.

- To safeguard legitimate interests: In individual cases, we process your data in order to protect legitimate interests of Flix or third parties. A legitimate interest exists, for example, if your data is required to assert, exercise or defend legal claims within the scope of the application process (e.g., claims under the General Equal Treatment Act).

If we use information from public profiles on professional social networks, the legal basis for the processing - creating a basis for the decision on establishing an employment relationship with you - shall be considered in our legitimate interests, provided that your fundamental rights and freedoms are respected.

Personal data that you provide during the application process is generally voluntary. However, it is necessary to provide this personal data for the processing of your application or the conclusion of an employment contract.

#### 4. Data recipients

Your personal data may be transmitted by us to affiliated companies, provided this is permitted within the framework of the purposes and legal bases set out above. After your application has been received, your applicant data will only be submitted to those offices that require them to carry out the application process. In addition to the company posting the job and the employees of the department that is hiring, these are generally also the responsible employees of the Human Resources Department of Flix SE.

Your personal data may also be processed on our behalf based on contracts pursuant to Chilean law, in particular by system providers as part of applicant management or the completion of the application process. Personal data will not be transferred to third parties if there is no reference to applicant management and the applicant selection processes or outside of the purposes described in the "Purposes of processing" section.

Our Career Portal is technically implemented via the service provider Greenhouse Software, Inc., 110 Fifth Avenue, 3d Fl., New York, NY 10011 USA (hereinafter also referred to as "Greenhouse"). Greenhouse processes your data on our behalf as a processor. Your personal data will be transmitted to Greenhouse for the purposes of this processing. You can find further information regarding data protection and data security at the following links: <https://www.greenhouse.io/privacy-policy>, <https://www.greenhouse.io/security-and-performance>.

As this involves transfers of personal data to recipients outside Chile, we ensure that adequate safeguards are applied in accordance with Law No. 21.719, such as adequacy decisions or contractual clauses, to guarantee an adequate level of protection. You will be informed if your data is transferred to a country without adequate protection and of the safeguards adopted

In the case of a legal obligation, we reserve the right to disclose information about you if we are required to disclose it to lawfully acting authorities or law enforcement bodies.

## **5. Your rights**

You may assert your rights as a data subject regarding your personal data at any time, in particular by contacting us using the contact details provided in Clause 1. According to Chilean law, you have the rights listed below:

### **Right to information**

You can request information about your personal data processed by us. Upon request, we will provide you with a copy of the data that are the subject matter of the processing including details about its source, purposes, recipients, retention periods, legal bases and any automated decision-making involved.

### **Right to rectification**

If the information relating to you is not (any longer) correct, you may request a correction. If your data is incomplete, you may request completion.

### **Right to erasure**

You may request the erasure of your personal data in accordance with the provisions of Chilean law, for example when data is no longer necessary for the purposes collected, when you withdraw your consent and no other legal basis applies, or when processing is unlawful.

### **Right to restriction/blocking**

In accordance with Chilean law, you have the right to demand a restriction or temporary suspension of the processing of the data relating to you.

### **Right to object**

You have the right to object to the processing of your data at any time for reasons relating to your particular situation. You can object to receiving advertising or direct marketing at any time with effect for the future.

### **Right to appeal**

If you are of the opinion that we have not complied with the provisions of data protection regulations when processing your data, you may complain to competent Chilean courts or, as of December 2026, to the “Agencia de Protección de Datos Personales”.

### **Right to withdraw consent**

You can withdraw your consent to the processing of your data at any time with future effect.

### **Right to portability**

You may request to receive the personal data you have provided in a structured, commonly used electronic format and to request its transmission to another controller when technically feasible.

### **Right not to be subject to automated decisions**

You have the right not to be subject to decisions based solely on automated processing, including profiling, which produce legal effects concerning you or significantly affect you, and you may request human intervention and an explanation.

## **6. Storage/retention periods**

We store your personal data for a period of 6 months after sending the rejection for the respective position. This storage period is particularly necessary for cases in which we must fulfill obligations to provide evidence in proceedings or defend ourselves against any claims asserted.

If you have given your consent, we will store your data for this period in case there is another job posting you are a suitable candidate for.

You can request the erasure of your applicant data or the withdrawal of your application at any time by contacting us via email at [jobs@flixbus.com](mailto:jobs@flixbus.com).

If you have consented to be included in our talent pool as part of the application process, your application documents will be processed in the talent pool solely within the framework of future job postings that could be suitable for you and will be destroyed after a period of one year at the latest, unless you renew your consent.

In the event that your application is successful, we will store your personal data for the entire duration of your employment relationship in accordance with the Privacy Policy for Employees, which we will send you upon acceptance of employment. Once the relevant retention periods expire, or where you withdraw your consent and no other legal basis applies, your data will be securely deleted or anonymized.

## G. Privacy Policy for Türkiye

### 1. Collection of data

We collect and process the following categories of personal data as part of the application process:

- Personal master data and contact details in your candidate profile (e.g., first and last name, country, email address, phone number).
- Information provided by you as part of the application form (e.g., information on salary expectations, your motivation, work permit for the respective country, as well as disability information if applicable (if relevant for the advertised position)).
- Application documents (including, for example, resume, cover letter, professional development data, qualifications or language skills).
- Results of online procedures (e.g., performance tests) and video interviews, if applicable.
- Additional information and documents (such as references) if and to the extent that you provide them to us.

If and to the extent that performance tests are given, we evaluate the results using relevant reference groups, taking into account your profession and your level of experience.

We may also obtain the personal data about you listed above from other sources or from external business partners, such as HR service providers. This data may also originate, for example, from professional social networks where you have published it, e.g., LinkedIn. This may also involve data that you have provided us via third-party websites, e.g., job portals, or data that you have published in other publicly accessible sources. This data is limited to data that is relevant to your professional career and solely for the purpose of communicating job offers from our group of undertakings or aligning the accuracy of your information in the application documents.

### 2. Purposes of processing

We collect and process your personal data to be able to offer advertised positions and carry out the selection process. In this case, we process your personal data exclusively for the following purposes:

- To be able to identify you as an applicant.
- To initiate and establish an employment relationship.
- To contact you if you should be considered for an alternative position (depending on whether you give us your consent to do).

- To ask you about your satisfaction with the application process, provided you have given us your consent for this.
- To contact you about your speculative application.
- To send you personalized information about open positions at Kamil Koç Otobüsleri A.Ş. based on your consent.
- To save you in our talent pool for any other suitable job offers based on your previously granted consent.

If your application is successful, the application data transmitted by you to Kamil Koç Otobüsleri A.Ş. will also be processed to complete the recruitment process, particularly to conclude an employment contract with you, as well as in connection with administrative matters related to your employment.

### 3. Legal bases

We process your personal data within the scope of the application process only to the extent permitted by an applicable legal provision, i.e. based on the provisions of the Law of Data Protection ("KVKK"). In doing so, we will base the processing of your personal data on the following legal bases, among others:

- **For the decision on establishing the employment relationship:** Your personal data will be collected and processed in order to fill advertised positions and to carry out the selection process. We process your data primarily to establish the employment relationship on the basis of KVKK Art. 6/3-f.
- **To fulfill legal obligations:** We process your data to fulfill legal obligations. For example, we are legally obligated to ensure an appropriate level of data security-(Art. 12 KVKK). Furthermore, we also need your data, among other things, if you exercise your rights with us as a data subject in accordance with Art. 11 KVKK. This data processing is carried out on the basis of Art. 6/3-f KVKK.
- **Based on your consent:** If you voluntarily provide us with special categories of personal data, we will only process them on the basis of your consent. The legal basis for this is Art. 5/1 and 6/3-a KVKK.

If a performance test is planned for the respective position, participation in these tests is voluntary and requires your consent. You can decline to participate in such a test. The legal basis for this is Art. 6/1-a GDPR.

As part of the application process, we offer suitable applicants the option of being stored in our talent pool for a period of one year based on consent within the meaning of Art. KVKK md. 5/1 ve 6/3-a. This consent is voluntary and can be revoked at any time for the future.

- **To safeguard legitimate interests:** In individual cases, we process your data in order to protect legitimate interests of Flix or third parties. A legitimate interest exists, for example, if your data is required to assert, exercise or defend legal claims within the scope of the application process. In these cases, the data processing takes place on the basis of Art. 5 and 6 KVKK. A legitimate interest is, for example, the need to provide evidence in proceedings.

If we use information from public profiles on professional social networks, the legal basis for the processing - creating a basis for the decision on establishing an employment relationship with you - shall be considered in our legitimate interests. The legal basis is Art. 5/2-d,e,f

Personal data that you provide during the application process is generally voluntary. However, it is necessary to provide this personal data for the processing of your application or the conclusion of an employment contract.

#### 4. Data recipients

Your personal data may be transmitted by us to affiliated companies, provided this is permitted within the framework of the purposes and legal bases set out above. After your application has been received, your applicant data will only be submitted to those offices that require them to carry out the application process. In addition to the company posting the job and the employees of the department that is hiring, these are generally also the responsible employees of the Human Resources Department of Kamil Koç Otobüsleri A.Ş..

Your personal data may also be processed on our behalf based on contracts pursuant to Art. 12/2 KVKK, in particular by system providers as part of applicant management or the completion of the application process. Personal data will not be transferred to third parties if there is no reference to applicant management and the applicant selection processes or outside of the purposes described in the "Purposes of processing" section.

In the case of a legal obligation, we reserve the right to disclose information about you if we are required to disclose it to lawfully acting authorities or law enforcement bodies; the legal basis is Art. 5/2-a KVKK.

#### 5. Your rights

You may assert your rights as a data subject regarding your personal data at any time, in particular by contacting us using the contact details provided in Clause 1. According to the KVKK, you have the rights listed below:

##### Right to information

You can request information in accordance with Art. 11 KVKK about your personal data processed by us. In your request for information, you should clarify your concern to make it easier for us to compile the necessary data. Upon request, we will provide you with a copy of the data that are the subject matter of the processing. Please note that your right to

information may be limited under certain circumstances in accordance with statutory provisions.

### **Right to rectification**

If the information relating to you is not (any longer) correct, you may request a correction in accordance with Art. 11/1-d KVKK. If your data is incomplete, you may request completion.

### **Right to erasure, destruction or anonymisation of personal data**

You may request the erasure, destruction or anonymisation of your personal data in accordance with the provisions of Art. 7 KVKK. Your right to erasure, destruction or anonymisation depends, among other things, on whether the data relating to you are still required by us to perform our statutory duties.

### **Right to object communication**

In accordance with Art. 9 Commercial Communication and Commercial Electronic Communication Regulation, you have the right to object to the processing of your data at any time for reasons relating to your particular situation. You can object to receiving advertising at any time with effect for the future, in accordance with Art. 9 Commercial Communication and Commercial Electronic Communication Regulation (objection to advertising in the case of direct marketing).

### **Right to appeal**

If you are of the opinion that we have not complied with the provisions of data protection regulations when processing your data, you can complain to a data protection authority about the processing of your personal data.

## **6. Storage/retention periods**

We store your personal data for a period of 1 year after sending the rejection for the respective position. This storage period is particularly necessary for cases in which we must fulfill obligations to provide evidence or defend ourselves against any claims asserted.

If you have given your consent, we will store your data for this period in case there is another job posting you are a suitable candidate for.

You can request the erasure of your applicant data or the withdrawal of your application at any time by contacting us via email at: [kamilkoc@kamilkoc.com.tr](mailto:kamilkoc@kamilkoc.com.tr)

If you have consented to be included in our talent pool as part of the application process, your application documents will be processed in the talent pool solely within the framework of future job postings that could be suitable for you and will be destroyed after a period of one year at the latest.

## H. Privacy Policy for Peru

This Applicant Privacy Policy is aligned with Law No. 29733, Law on Personal Data Protection (“the Law”), and its Regulations, approved by Supreme Decree No. 016-2024-JUS (collectively referred to as the “Personal Data Protection Regulations”), which govern the processing of personal data in Peru. Flix undertakes to comply with these regulations in the processing of personal data of its applicants.

### 1. Collection of data

We collect and process the following personal data as part of the application process:

- Personal data and contact information: First and last name, country, email address, phone number.
- Information provided by you as part of the application form: Information on salary expectations, your motivation, work permit, as well as disability information if applicable (if relevant for the advertised position).
- Relevant information about work experience: resume, Curriculum Vitae, professional development data, qualifications or language skills, visa or work permit status.
- If you participate in assessments or video interviews, the data collected through those means may also be processed.
- Document submission of DNI or Visa Documents for non-citizens to verify the legal eligibility to enter into an employment contract (if necessary).

### 2. Purposes of processing

We collect and process your personal data exclusively for the following purposes:

- To be able to identify you as an applicant.
- To take notes and make assessments to decide on suitability for the job.
- To evaluate your application and manage the application process
- To contact you regarding your application.
- If your application is successful, the application data transmitted by you to Flix will also be processed to complete the application process, particularly to conclude an employment contract with you, as well as in connection with administrative matters related to your employment.



The legal basis for this processing is regulated under the provisions established in Law No. 29733, Personal Data Protection Law and its Regulations – Supreme Decree No. 016-2024-JUS.

Also, we take notes on the content of the interview using an application based on artificial intelligence. Our legitimate interest is to fully focus on the interview with you and make well-informed hiring decisions.

In addition, if you have given your free, prior, and informed consent, we may also use your personal data:

- To contact you if you should be considered for an alternative or different position
- To send you personalized information about open positions at Flix
- To save you in our talent pool for any other suitable job offers

Personal data that you provide during the application process is generally voluntary. However, it is necessary to provide this personal data for the processing of your application or the conclusion of an employment contract.

### 3. Personal Data Controller and contact details

The Flix company named in the job posting you have applied to (hereinafter: Flix) is responsible for processing your personal data within the framework of your application. You can contact this company using the details provided in the job posting.

Also, you can contact our data protection department for all data protection issues at [gdpr@flixbus.com](mailto:gdpr@flixbus.com).

### 4. Data recipients

Flix may transfer your personal data to service providers and group companies that support the recruitment process, such as applicant tracking platforms, assessment service providers, and HR software vendors. These entities process your data on behalf of Flix under strict contractual obligations of confidentiality and data protection.

Flix may also disclose your data to public authorities where required by law (e.g., immigration authorities in the case of foreign applicants).

In the following, we will tell you to whom Flix transfers your data and the purpose of the transfer.

NAME	RUC/ TAX CODE	DOMICILE	PURPOSE
(*)	(*)	(*)	(*)

(*)	(*)	(*)	(*)
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In the context of the processing operations mentioned above, data may be transferred to a third country, as indicated below:

NAME	TAX ID	DOMICILE	PURPOSE
(*)	(*)	(*)	(*)
(*)	(*)	(*)	(*)

Flix ensures that cross-border transfers adhere to the conditions set forth in the Personal Data Protection Regulations. The National Authority for Personal Data Protection will be notified of such transfers as required. Suitable measures may include:

- Standard data protection clauses (available at [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc/standard-contractual-clauses-international-transfers\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc/standard-contractual-clauses-international-transfers_en))
- Additional safeguards (e.g., pseudonymization)

## 5. Storage/retention periods

Your personal data will be deleted or blocked as soon as the purpose for storing it no longer applies. This is usually six (6) months after the end of the recruitment process. If you provided consent to be included in the talent pool, your data will be retained for up to one (1) year.

If your application is successful, your data will be stored for the duration of the employment relationship in accordance with the Employee Privacy Notice.

## 6. Rights

In compliance with the Personal Data Protection Regulations, applicants have the following rights regarding the processing of their personal data:

1. **Right of Access and Information:** Applicants have the right to obtain information about their personal data that is being processed in Flix's data banks.
2. **Right to Rectification, Updating, and Inclusion:** Applicants have the right to update, include, and rectify their personal data when it is partially or totally inaccurate, incomplete, or when an omission, error, or falsehood has been identified.
3. **Right to Cancellation or Deletion:** Applicants may request the cancellation or deletion of their personal data when it is no longer necessary or relevant for the purpose for which it was collected.

4. **Right to Object:** Applicants may object to the processing of their personal data at any time. The objection will be valid as long as the processing does not have legitimate or legal grounds.
5. **Right to Data Portability:** Applicants may request their personal data, which they have provided to Flix or a data processor, in a structured, commonly used, and machine-readable format. They may also request the transfer of their data to another data controller when processing is based on consent or a contractual relationship, or when processing is carried out through automated means.

If you wish to exercise any of these rights, please contact us at

[data.protection.pe@cs.flixbus.com](mailto:data.protection.pe@cs.flixbus.com).

If you consider that the processing of personal data concerning you by Flix is contrary to the relevant legal provisions, you may also contact the Peruvian National Authority for Personal Data Protection.

## I. Privacy Policy for Australia

FlixBus Australia Pty Ltd (**Flix Australia**) understands the importance of protecting the privacy of an individual's personal information.

This policy sets out how Flix Australia aims to protect the privacy of your personal information which it collects in connection with your application for employment with Flix Australia, your rights in relation to your personal information managed by Flix Australia and the way Flix Australia collects, holds, uses and discloses your personal information.

In handling your personal information, Flix Australia complies with the *Privacy Act 1988* (Cth) (**Privacy Act**), the Australian Privacy Principles (**APPs**) in the Privacy Act, and applicable health records legislation.

### 1. What kinds of personal information does Flix Australia collect from Applicants?

Personal information is information or an opinion about an identified, or reasonably identifiable, individual.

During the recruitment process, Flix Australia will collect your personal information when you register your interest in a role(s) and when you provide personal information in connection with your application, and will hold, use and disclose your personal information for the purposes of assessing your suitability for employment.

Generally, the kinds of personal information that Flix Australia will collect about you in connection with your application for employment include:

- (a) contact and identification information such as your name, residential address, telephone number, email address, date of birth, and identity verification information (where applicable);
- (b) information about your education and work history, experience, qualifications and skills, and the opinions of others about your work performance;
- (c) information and results from interviews and psychometric or competency assessments;
- (d) health information which will only be collected where it is relevant to Flix Australia's assessment of whether you are able to perform the inherent requirements of a particular position and with your consent;
- (e) criminal record information, which will only be collected where relevant to the recruitment process and with your consent;
- (f) other personal information obtained during the application process from documentation you submit to us, for example from your resume and cover letter; and

- (g) other information required for our recruitment functions, including where required by law.

In some circumstances, Flix Australia may also hold other personal information provided by you or obtained from third parties about you with your consent.

## **2. How does Flix Australia collect personal information?**

Generally, Flix Australia collects your personal information directly from you. For example, Flix Australia may collect your personal information through:

- (a) your completion of a manual or online job application form and provision of documentation in connection with your application;
- (b) an interaction or exchange with you, whether in person or by way of telephone, video conference, email, or other electronic communication or post; and/or
- (c) your use or access of Flix Australia's website.

There may be occasions when Flix Australia collects your personal information from other sources, including: [

- (a) a third party website, when you register your interest in one of our advertised roles via such website;
- (b) background screening service providers;
- (c) referees or third parties with whom you have previously worked;
- (d) educational institutions with whom you have completed a qualification;
- (e) psychometric or competency assessment providers with whom you undertake pre employment psychometric testing or competency assessments; and/or
- (f) a publicly maintained record or other publicly available source of information including social media, such as LinkedIn.

Generally, Flix Australia will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect your personal information from you or with your consent.

## **3. Why does Flix Australia need your personal information?**

Flix Australia collects, holds, uses and discloses your personal information where it is reasonably necessary for the purposes of assessing your suitability for employment.

Flix Australia may also use or disclose your personal information for related purposes for which you would reasonably expect Flix Australia to use or disclose your personal

information, where you have consented to the use or disclosure, or where the use or disclosure is otherwise in accordance with law.

Where personal information is used or disclosed, Flix Australia takes steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is used or disclosed.

You are under no obligation to provide your personal information to Flix Australia. However, without certain personal information from you, Flix Australia may not be able to assess your application for employment.

If Flix Australia receives personal information that it has not requested and determines that the personal information received is not reasonably necessary for the purposes of assessing your application for employment, Flix Australia will take all lawful and reasonable steps (if any) to de-identify or destroy that personal information.

#### **4. To whom does Flix Australia disclose your personal information?**

Flix Australia discloses your personal information for the purposes for which Flix Australia collects it. That is, generally, Flix Australia will only disclose your personal information for a purpose contemplated by section 3 above. This may include disclosing your personal information to:

- (a) third parties engaged by Flix Australia to perform business and administrative functions including but not limited to background screening, reference checking, and conducting psychometric testing or competency assessments;
- (b) with your consent, your current employer and/or any individuals who you nominate as referees to verify certain information;
- (c) other companies within Flix Australia's corporate group (who may be located overseas); and
- (d) regulatory bodies and agencies if and as necessary, including the Australian Taxation Office.

Flix Australia's disclosures of your personal information to the above third parties will be on a confidential basis or otherwise in accordance with the law. Flix Australia may also disclose your personal information with your consent or if disclosure is required or authorised by law.

#### **5. Overseas disclosure**

Flix Australia may disclose your personal information to overseas recipients in order to assess your application for employment. It is impracticable to list all countries in which recipients may be located but it is likely that such countries will include Germany, where Flix Australia's parent company is headquartered.

Overseas recipients may have different privacy and data protection standards. However, before disclosing any personal information to an overseas recipient, Flix Australia takes steps reasonable in the circumstances to ensure the overseas recipient complies with the APPs or is bound by a substantially similar privacy scheme unless you consent to the overseas disclosure or it is otherwise required or permitted by law. If you have any queries or objections to such overseas disclosure, please contact Flix Australia's Privacy Officer on the details set out in paragraph 9.

## **6. Security of your personal information**

Flix Australia takes steps reasonable in the circumstances to ensure that the personal information it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure.

Flix Australia holds personal information in both hard copy and electronic forms in secure servers or in storage located in secure environments. Flix Australia employees are required to maintain the confidentiality of any personal information held by Flix Australia.

Flix Australia will destroy or de-identify personal information in circumstances where it is no longer required, unless Flix Australia is otherwise required or authorised by law to retain the information.

## **7. Can you access and correct the personal information that Flix Australia holds about you?**

Flix Australia takes steps reasonable in the circumstances to ensure personal information it holds is accurate, up-to-date, complete, relevant and not misleading.

Under the Privacy Act, you may seek access to and correction of your personal information that is collected and held by Flix Australia. If at any time you would like to access or correct the personal information that Flix Australia holds about you, or you would like more information on Flix Australia's approach to privacy, please contact Flix Australia's Privacy Officer on the details set out in paragraph 9 below.

Where Flix Australia outsources any functions relating to assessing your application for employment, any request for access to or correction of the personal information held by that service provider may need to be made to the relevant service provider.

Flix Australia will grant access to the extent required or authorised by the Privacy Act and take steps reasonable in the circumstances to correct personal information it holds about you where necessary and appropriate.

To obtain access to your personal information:

- (a) you will have to provide proof of your identity to enable Flix Australia to confirm that the personal information to which you seek access is about you, and to ensure that the privacy of others is protected;

- (b) Flix Australia requests that you be reasonably specific about the information you require; and
- (c) Flix Australia may charge you a reasonable administrative fee, which reflects the cost to Flix Australia, for providing access in accordance with your request.

Flix Australia will endeavor to respond to your request to access or correct your personal information within 30 days from receipt of your request.

## 8. Cookies

When accessing Flix Australia's website, or a related entity's website, Flix Australia uses 'cookies' to store a log file which is retained for technical and statistical purposes only.

Cookies are small pieces of information sent from the website and stored by your Internet browser on your computer's hard drive. You can disable cookies at any time. However, if a browser does not accept cookies or if you reject a cookie, some portions of Flix Australia's online services may not function properly.

To the extent any personal information is collected through Flix Australia's use of cookies, it is de-identified prior to being analysed for technical and statistical purposes.

## 9. How to contact us

For further information or enquiries regarding your personal information or to request access to or correction of your personal information or to make a privacy complaint, please contact Flix Australia's Privacy Department using the following contact details:

Flix Australia Pty Ltd

Level 18, 347 Kent Street, Sydney, NSW, 2000, Australia

[data.protection.au@fcs.flixbus.com](mailto:data.protection.au@fcs.flixbus.com)

## 10. Privacy complaints

Please direct all privacy complaints to Flix Australia's Privacy Officer in writing using the contact details contained under paragraph 10. At all times, privacy complaints:

- (a) will be treated seriously;
- (b) will be dealt with promptly; and
- (c) will be dealt with in a confidential manner.

In the event you are dissatisfied with Flix Australia's response to your complaint, you may refer the complaint to the Office of the Australian Information Commissioner.



## 12. Review of this policy

This policy may be reviewed and updated from time to time. Where Flix Australia updates this policy, Flix Australia will make the updated policy available.