

# Privacy Policy for Applicants pursuant to Article 13 of the GDPR – Fulfilment of Information Obligations

With this privacy policy, the **tyromotion GmbH** fulfils its obligation to inform you, as an applicant, about the processing of your personal data using the “BMD” tool.

All references to persons always apply to all genders. The use of the masculine form is solely for the sake of readability.

## 1 Joint controllers for data processing, authorisation concept

### 1.1 Joint controllership

The tyromotion Group is a global group of companies. With regard to the processing of applicants’ personal data, there is a so-called “joint controller” arrangement within the meaning of Article 26(1) of the GDPR, i.e. the purposes and means of processing personal data are determined jointly. A corresponding agreement on joint data processing has been concluded within the group.

The main point of contact for Austrian applications is tyromotion GmbH, which also handles recruitment for other group companies. However, data subjects may, of course, exercise all their data protection rights directly with the individual companies concerned. All companies involved in the joint data processing are listed under point 9.

### 1.2 Access Control Policy

Within the tyromotion group of companies, various tasks are also carried out across borders by international teams, and software tools are shared. A strict authorisation policy has been drawn up for all persons who work with personal data. Access to data is granted exclusively on a need-to-know basis. In each country, only a small number of employees are authorised to access the personal data of applicants. Joint responsibility applies to the use of the BMD tool; however, each application is processed separately by the recruitment team in the country to which you have applied. Your data will be made available to the recruiter and the managers responsible for filling the position.

## 2 Data processor BMD

We use the “BMD” application system provided by BMD Systemhaus GesmbH, Sierninger Straße 190, A-4400 Steyr, Austria (hereinafter “BMD”) for the application process (advertising vacancies, receiving applications, communicating with applicants, and managing and maintaining records of applications).

In the course of these activities, BMD processes personal data solely on behalf of and for the purposes of tyromotion GmbH and is therefore a so-called data processor within the meaning of Article 4(8) of the GDPR.

BMD’s privacy policy can be found at: <https://www.bmd.com/at/datenschutz>

## 3 Data subjects, categories of data, transfer, disclosure

### 3.1 Categories of data processed

Data subjects are individuals who apply as candidates for a vacancy advertised by tyromotion GmbH on its own behalf or on behalf of another company within the group. This also includes individuals who submit unsolicited applications.

### 3.2 Categories of data processed

We process all data that you provide to us via our applicant portal during the application process. This includes:

- Name details (first name and surname)

- Title
- Gender
- Date of birth
- Address and contact details (e.g. postal address, telephone number, email address)
- Country of residence
- Application documents (e.g. CV, cover letter and, where applicable, references, application photo)
- Education details (e.g. information on school or university qualifications)
- Details of previous employment (e.g. reference)
- Professional requirements (e.g. job profile, job description, desired working hours, notice period, salary expectations)
- Other skills and qualifications (e.g. additional training, certificates, languages or hobbies)
- Files and documents that you upload voluntarily

In addition, we store the written, electronic communication that takes place between you and us. Furthermore, we process comments and reviews written about you during your application process.

### 3.2.1 Disclosure of data

tyromotion GmbH forwards incoming applications intended for other companies within the group to the relevant contact persons at those companies via the BMD platform. The data does not leave the platform at any point.

## 4 Purpose of data processing, legal basis

### 4.1 Purpose

Your personal data is processed for the purposes of recruitment and filling vacant positions.

### 4.2 Legal basis

The transmission of your data to us as part of your application is based on a pre-contractual relationship.

Legal basis: Article 6(1)(b) GDPR (pre-contractual measures)

Record-keeping: We will process your data on the basis of your consent should you explicitly agree to us keeping a record of your application documents.

Legal basis: Article 6(1)(a) GDPR (consent)

In certain cases, we process your data to safeguard a legitimate interest of ours or of third parties. A legitimate interest exists, for example, where your data is required for the assertion, exercise or defence of legal claims within the context of the application process (e.g. due to a legal dispute arising from potential discrimination). In the event of a legal dispute, we have a legitimate interest in processing the data for evidential purposes.

Legal basis: Article 6(1)(f) GDPR (Legitimate interest)

## 5 Retention Period

If we have advertised a specific vacancy and you apply for it, your data will generally be stored for 7 months (if we are unable to consider you in the selection process) from the date your application is rejected.

Should you give your consent, your data will be stored for 12 months for the purpose of further consideration and to contact you regarding suitable future job vacancies. Once this retention period has expired, you will be informed by email of the impending deletion of your data and your user account. You have the option to extend the retention period of your personal data by making a conscious decision to do so.

## 6 Your rights

You have the following rights in relation to your personal data:

- Right of access, rectification and erasure
- Right to restriction of processing
- Right to object to processing after consent has been given
- Right to data portability

In addition to the above rights, you have the right to lodge a complaint with a data protection authority; in Austria, this is the Austrian Data Protection Authority:

- Address: Barichgasse 40–42, 1030 Vienna
- Telephone: +43 1 52 152-0
- Email: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)

If you believe that we have breached Austrian or European data protection law in the processing of your data and thereby infringed your rights, we ask you to contact us so that we can clarify any questions you may have.

Please send your enquiries and concerns by email to [office@tyromotion.com](mailto:office@tyromotion.com) or contact us using the contact details provided.

## 7 Withdrawal of your consent

If you have given us your consent to process your personal data, you may withdraw this consent at any time. The withdrawal of your consent takes effect from the date of withdrawal. The lawfulness of the processing of your personal data up to the date of withdrawal remains unaffected. Please send your withdrawal to: [office@tyromotion.com](mailto:office@tyromotion.com) .

If you withdraw your consent, we will process your personal data collected in this context in order to respond to your enquiry. The processing of your personal data is carried out to fulfil a legal obligation on the basis of Article 6(1)(c) of the GDPR.

## 8 Changes to this Privacy Policy

We reserve the right to make changes to our privacy policy from time to time. All changes to the privacy policy will be published online by us. Please refer to the current version of our privacy policy in this regard.

## 9 Appendix

Companies (the list does not claim to be complete or up to date, but is checked at regular intervals and supplemented where necessary) for which tyromotion GmbH carries out recruitment activities:

**tyromotion GmbH**  
Bahnhofgürtel 59  
8020 Graz

**Tyromotion Inc**  
1341 Capital Circle  
SE Suite J Marietta  
GA 30067, USA

As of 5/2026