



CANDIDATE PRIVACY NOTICE

Last Updated: 26 August 2026

Welcome to HRMLESS. This Candidate Privacy Notice explains how HRMLESS, LLC (“**HRMLESS**”, “**we**”, “**us**”, or “**our**”) processes data that identifies or relates to you (“**personal data**”) in connection with your use of HRMLESS, our AI-powered interview platform (our “**interview services**”).

This Candidate Privacy Notice does not address our privacy practices relating to visitors of HRMLESS webpages. Please see our [Website Privacy Notice](#) for more information about our processing of your personal data as a visitor to our webpages.

This Candidate Privacy Notice does not apply to HRMLESS job applicants, employees or other employment-related individuals, or to data that is not subject to applicable data protection laws (such as deidentified or publicly available information).

This Candidate Privacy Notice is not a contract and does not create any legal rights or obligations not otherwise provided by law.

Our Role in Processing Personal Data

Data protection laws distinguish between “controllers” and “processors” of personal data. A controller determines why and how personal data is processed, while a processor, sometimes called a “service provider,” processes personal data on the controller’s behalf and in accordance with its instructions.

When an employer or recruiter (an “**Employer**”) uses HRMLESS’s AI-powered solutions to interview or evaluate candidates, the Employer is the controller of candidates’ personal data, and HRMLESS generally acts as its processor. This Candidate Privacy Notice does not describe how Employers process candidates’ personal data. For that information, including how to exercise any rights that may be available to you under applicable law, please review the privacy notice of the Employer with which you are interviewing and direct any privacy requests to that Employer.

HRMLESS and our AI-powered solutions do not make hiring decisions. We provide interview-related services and may generate recommendations or other information only to assist Employers in evaluating candidates. Each Employer determines how to use that information and makes its own hiring decisions.

Our Collection and Use of Personal Data

The categories of personal data we collect depend on how you interact with HRMLESS. We also collect personal data automatically when you interact with HRMLESS.

Personal Data Provided by Candidates

We collect the following categories of personal data that candidates provide to us. We use this information solely to provide our services to the Employers you interview with.

- **Account and Contact Information**, including first and last name, phone number, and email address. We use this information to facilitate interviews between you and Employers.
- **Interview responses and recordings**, including written responses to Employer questions, interview transcripts, audio recordings of your interviews, and, where the Employer has enabled video, a video recording. We use only the interview transcript and the substance of your written responses to generate scores, summaries, rankings and assessments for the Employer you are interviewing with. We do not analyze your face, emotions, accent, or voice, or otherwise create biometric identifiers.
- **Feedback and Support Information**, including the contents of custom messages sent through SMS, the forms, chat platforms, email addresses, or other contact information we make available to candidates, as well as recordings of calls with us, where permitted by law (including through the use of automated tools provided by us or our third-party providers). We use this information primarily to communicate with you about scheduling, reminders and support.

If you choose to contact us, we may need additional information to fulfill the request or respond to your inquiry. We may provide additional privacy disclosures where the scope of the request we receive or personal data we require fall outside the scope of this Candidate Privacy Notice. In that case, the additional privacy disclosures will govern how we may process the information you provide at that time.

Personal Data Automatically Collected

We, and our third-party partners, automatically collect information you provide to us and information about how you access and use our interview services. We typically collect this information through the use of a variety of our own and our third-party partners' automatic data collection technologies, including (i) cookies or small data files that are stored on an individual's computer and (ii) other, related technologies, such as web beacons, pixels, embedded scripts, mobile SDKs, location-identifying technologies and logging technologies. Information we collect automatically about you may be combined with other personal information we collect directly from you or receive from other sources.

We, and our third-party partners, use automatic data collection technologies to automatically collect the following data when you use our services or otherwise engage with us:

- **Information About Your Device and Network**, including the device type, manufacturer, and model, operating system, IP address, browser type, Internet service provider, and unique identifiers associated with you, your device, or your network (including, for example, a persistent device identifier or advertising ID). We employ third-party technologies designed to allow us to recognize when two or more devices are likely being used by the same individual and may leverage these technologies (where permitted) to link information collected from different devices.
- **Information About the Way Individuals Use Our Interview Services and Interact With Us**, including the site from which you came, the site to which you are going when you leave our interview services, how frequently you access our interview services, whether you open emails or click the links contained in emails, and whether you access our interview services from multiple devices.
- **Information About Your Location**, including general geographic location that we or our third-party providers may derive from your IP address.

All of the information collected automatically through these tools allows us to deliver and secure our interview services; diagnose or fix technology problems; and otherwise to plan for and enhance our products and services.

For information about the choices you may have in relation to our use of automatic data collection technologies, please refer to the [Your Privacy Choices](#) section below.

Personal Data from Other Sources and Third Parties

We may receive the same categories of personal data as described above from Employers. For example, we may obtain your contact information from an Employer to allow us to communicate with you about scheduling an interview.

Additional Uses of Personal Data

In addition to the primary purposes for using personal data described above, we may also use personal data we collect to:

- Manage our organization and its day-to-day operations;
- Communicate with you, including via email, text message, chat, and/or telephone calls;
- Facilitate the relationship we have with you;
- Request that you provide us with feedback about our product and service offerings;
- Address inquiries or complaints made by or about an individual in connection with our interview services;
- Create and maintain accounts for our users;
- Develop, operate, improve, maintain, protect, and provide the features and functionality of our products and services;
- Identify and analyze how you use our interview services;
- Create aggregated or de-identified information that cannot reasonably be used to identify you, which information we may use for purposes outside the scope of this Candidate Privacy Notice;
- Conduct research and analytics on our user base and our products and services, including to better understand the demographics of our users;
- Improve and customize our products and services to address the needs and interests of our user base and other individuals we interact with;
- Test, enhance, update, and monitor the products and services, or diagnose or fix technology problems;
- Help maintain and enhance the safety, security, and integrity of our AI interview platform, property, products, services, technology, assets, and business;
- Defend, protect, or enforce our rights or applicable contracts and agreements (including our [Candidate Terms of Service](#)), as well as to resolve disputes, to carry out our obligations and enforce our rights, and to protect our business interests and the interests and rights of third parties;
- Detect, prevent, investigate, or provide notice of security incidents or other malicious, deceptive, fraudulent, or illegal activity and protect the rights and property of HRMLESS and others;
- Facilitate business transactions and reorganizations impacting the structure of our business;
- Comply with contractual and legal obligations and requirements; and
- Fulfill any other purpose for which you provide your personal data, or for which you have otherwise consented.

We do not sell interview data, and we do not train, develop, or improve AI models using your interview recordings, transcripts, or responses. HRMLESS operates using third-party AI providers, and HRMLESS does not contribute your interview data to the training of any AI model.

Our Disclosure of Personal Data

We disclose or otherwise make available personal data in the following ways:

- **To Employers:** If you interact with our interview services, we will disclose personal data to the Employers you interview with.
- **To Service Providers:** We engage other third parties to perform certain services on our behalf in connection with the uses of personal data described in the sections above. Depending on the applicable services, these service providers may process personal data on our behalf or have access to personal data while performing services on our behalf.
- **In Connection with a Business Transaction or Reorganization:** We may take part in or be involved with a business transaction or reorganization, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose, transfer, or assign personal data to a third party during negotiation of, in connection with, or as an asset in such a business transaction or reorganization. Also, in the unlikely event of our bankruptcy,

receivership, or insolvency, your personal data may be disclosed, transferred, or assigned to third parties in connection with the proceedings or disposition of our assets.

- **To Facilitate Legal Obligations and Rights:** We may disclose personal data to third parties, such as legal advisors and law enforcement:
 - in connection with the establishment, exercise, or defense of legal claims;
 - to comply with laws or to respond to lawful requests and legal process;
 - to protect our rights and property and the rights and property of our agents, customers, and others, including to enforce our agreements, policies, and terms of use;
 - to detect, suppress, or prevent fraud;
 - to reduce credit risk and collect debts owed to us;
 - to protect the health and safety of us, our customers, or any person; or
 - as otherwise required by applicable law.
- **With Your Consent or Direction:** We may disclose your personal data to certain other third parties or publicly with your consent or direction. For example, with your permission, we may post your testimonial on our websites.

Your Privacy Choices

The following privacy choices are made available to all individuals with whom we interact.

Communication Preferences

- **Email Communication Preferences:** You can stop receiving promotional email communications from us by clicking on the “unsubscribe” link provided in any of our email communications. Please note you cannot opt-out of service-related email communications (such as, account verification, transaction confirmation, or service update emails).
- **Phone Communication Preferences:** You can stop receiving promotional phone communications from us by informing the caller you no longer wish to receive promotional phone calls from us, following the instructions provided on the call for opting out of promotional phone calls (where available), or replying STOP to any one of our promotional text messages. Please note we may need to continue to communicate with you via phone for certain service-related messages (such as sending a verification code to your phone via call or text for purposes of verifying the authenticity of a log-in attempt).

Automatic Data Collection Preferences

Where a HRMLESS-specific preference manager or privacy setting is not available, you may be able to utilize third-party tools and features to further restrict our use of automatic data collection technologies. For example, (i) most browsers allow you to change browser settings to limit automatic data collection technologies on websites, (ii) most email providers allow you to prevent the automatic downloading of images in emails that may contain automatic data collection technologies, and (iii) many devices allow you to change your device settings to limit automatic data collection technologies for device applications. Please note that blocking automatic data collection technologies through third-party tools and features may negatively impact your experience using our interview services, as some features and offerings may not work properly or at all. Depending on the third-party tool or feature you use, you may not be able to block all automatic data collection technologies or you may need to update your preferences on multiple devices or browsers. We do not have any control over these third-party tools and features and are not responsible if they do not function as intended.

Children’s Personal Data

Our services are not directed to, and we do not intend to, or knowingly, collect or solicit personal data from children under the age of 18. If an individual is under the age of 18, they should not use our services or otherwise provide us with any personal data either directly or by other means. If a child under the age of 18 has provided personal data to us, we encourage the child’s parent or guardian to contact us to request that we remove the personal data from our systems. If we learn that any personal data we collect has been provided by a child under the age of 18, we will promptly delete that personal data.

Retention of Personal Data

We retain the personal data we process in connection with your use of the interview services in accordance with Employers' instructions, or as otherwise required by law.

Third-Party Websites and Services

Our interview services may include links to third-party websites, plug-ins, applications and other services. Except where we post, link to or expressly adopt or refer to this Candidate Privacy Notice, this Candidate Privacy Notice does not apply to any personal data practices of third parties. To learn about the personal data practices of third parties, please visit their respective privacy notices.

California's Shine the Light Law

California's "Shine the Light" law (Civil Code Section 1798.83) provides certain rights to California residents that have an established business relationship with us with regard to the disclosure of certain types of personal information to third parties for their direct marketing purposes. It is company policy that we do not disclose personal information to third parties for their direct marketing purposes if a consumer has exercised their right to opt out. To opt out of having your personal information disclosed to third parties for their direct marketing purposes, please contact us by following the instructions under the Contact Us section of this Candidate Privacy Notice.

Updates to This Candidate Privacy Notice

We may update this Candidate Privacy Notice from time to time. When we make changes to this Candidate Privacy Notice, we will change the date at the beginning of this Candidate Privacy Notice. If we make material changes to this Candidate Privacy Notice, we will notify individuals by email at their registered email address, by prominent posting on this website or our other platforms, or through other appropriate communication channels. Material changes may include changes to: (1) categories of personal data processed, (2) processing purposes, (3) a controller's identity, (4) the act of sharing personal data with third parties, (5) categories of third parties personal data is shared with, or (6) methods by which consumers can exercise their data rights request. All changes shall be effective from the date of publication unless otherwise provided.

Contact Us

If you have any questions or requests in connection with this Candidate Privacy Notice or other privacy-related matters, please send an email to privacy@hrmless.com.