#### Via Match Privacy Policy

- Via Match respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we use your personal data that we collect in the course of our business and tell you about your privacy rights and how the law protects you.
- This privacy notice is aimed at anyone who uses our products or services, such as the VIA AI recruitment platform (the "**Platform**"), and any third parties with which we engage or do business. This includes our customers, suppliers, agents, consultants and partners who are individuals, as well as, where any of these are entities, their respective shareholders, directors, officers, managers, employees who provide their personal data to us or other individuals.
- It is important that you read this privacy policy together with any other relevant notices and policies we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

## Changes to the privacy notice and your duty to inform us of changes

- We keep our privacy notice under regular review. This version was last updated on 4 Sep 2025. Historic versions can be obtained by contacting us.
- It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

# If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

#### 1. Who we are

- We are Via Match Limited ("Via Match", "we", "us" or "our"), a company registered in England and Wales. Our company registration number is 16530334 and our registered office is at 3 Copthall Avenue, London, United Kingdom, EC2R 7BH. Via Match is the controller and responsible for your personal data.
- If you have any questions about this privacy notice or our privacy practices, please contact us by telephoning our customer service team at +442036179750 or by writing to us at support@viamatch.ai.

## 2. The data we collect about you

- Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
  - Identity Data includes first name, last name, date of birth or other identity data.
  - **Contact Data** includes address, email address, telephone numbers and social media handles.
  - **Technical Data** includes cookies, usage data, internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Platform.
  - **Profile Data** includes your username and password, your interests, preferences, feedback, survey responses (if relevant) and activity log.
  - Qualifications and Working Experience Data means your CV or resume, details of your education, training courses attended and internships, documents evidencing your right to work and any other information you listed in your profile.

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- **Usage Data** includes information about how you use the Platform, products and services, including interaction history and session duration.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties, communication preferences and engagement metrics
- **Special Categories of Personal Data** includes details you may submit on your profile about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data.
- **Sensitive Data** any other sensitive information that you may submit on your profile, such as, where relevant, information about criminal convictions and offences.

# 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Qualifications and Working Experience Data, Special Categories Data and Sensitive Data when you create an account or profile on the Platform or by corresponding with us in connection with our business or services.
- **Third Parties**. In some cases, we may also collect personal information directly or indirectly from third parties, such as recruitment agencies or hirers we work with as well as publicly available sources.
- **Automated technologies or interactions.** As you interact with the Platform or services, we will automatically collect Technical Data about your equipment and Usage Data.

# 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Where you have provided your consent.

Where we rely on consent as a legal basis for processing your personal data, we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

#### Purposes for which we will use your personal data

- We have set out in Schedule 1, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
- Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table in Schedule 1.
- We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.
- If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, where this is required or permitted by law.

### Marketing

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you (if applicable) or by contacting us at any time.

## 5. Disclosures of your personal data

We may share your personal data with certain third parties, such as set out below, for the purposes set out in Schedule 1:

- Clients of Via Match who are prospective employers or recruiters. In the final stages of the recruitment process, we may share your data with our clients who are offering job opportunities you may be interested in.
- Subsidiaries or holding companies of Via Match for our general business, reporting to management, authorisations/approvals from relevant decision makers, and where systems and services are used or provided on a shared basis.
- Third party service providers, such as payment processing companies that help process payments in connection with the use of the Platform or other services;
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers, suppliers or others.

#### Disclosure of your personal data to prospective employers or recruiters (our clients).

The Platform internally matches candidate profiles with job descriptions provided by our clients. During this initial matching phase, our clients do not have access to any candidate details.

Candidates will be notified when their profiles match a job description. At this stage, candidates have the option to express interest in the job opportunity. If a candidate is not interested, their details will remain private, and no further action will be taken.

Candidates who express interest in a job opportunity will undergo a further screening process. This includes AI-driven interviews and written queries to assess their suitability for the position. The screening process is designed to identify the top candidates for each job opportunity.

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Only the top candidates, as determined by the screening process, will be presented to our clients. At this final stage, candidate profiles become visible to our clients.

#### 6. Automated Decision Making

The Platform uses artificial intelligence (AI) systems to screen and shortlist candidates by automatically comparing the information you provide, such as skills, education, qualifications, and experience, with the requirements of job opportunities posted by our clients. The system applies algorithms designed to identify candidates whose profiles most closely match the specified job criteria. The outcome determines whether you are invited to further engagement or presented to clients. These algorithms do not make final hiring decisions but determine shortlisting for opportunities. If you wish to understand generally how these AI tools evaluate profiles, please contact us for further information.

Via Match regularly reviews and updates its AI systems to reduce the risk of bias or unfair discrimination. We take steps to ensure that automated decisions do not unlawfully disadvantage candidates based on factors such as race, ethnicity, gender, age, disability, or other protected characteristics. Where special category or sensitive data may be relevant, we only include it where necessary and in accordance with data protection law, and we apply additional safeguards.

We conduct regular assessments of the impact of our AI processing on your rights and freedoms and review our systems to ensure they comply with applicable data protection requirements. Data used in AI decision-making is limited to that which is necessary to assess suitability for available opportunities. Outputs produced by our AI systems are subject to ongoing review to ensure they remain accurate, relevant, and lawful.

If you believe your data used in automated decision-making is inaccurate or incomplete, you have the right to request correction or to challenge the outcome, as set out below.

Please note that we provide automated AI-driven shortlisting and matching candidates with opportunities as a core feature of our Platform. This service could not function without automated decision-making. As such, it is not possible to opt-out of AI-based candidate screening and shortlisting, as this is integral to the Platform's operation. If you do not wish for your application to be assessed in this way, you may choose not to use our services.

By using Platform, you acknowledge and agree that:

- Automated decision-making is an essential and non-optional part of the Platform;
- The service cannot be provided without such processing;
- Automated decision-making is necessary for the performance of a contract we have with you; and
- If you do not wish to be subject to automated processing, you should not use the Platform.

Where automated decision making is involved, the candidates have the right:

- To request human intervention in the decision-making process;
- To express your point of view and contest a decision;
- **To obtain meaningful information** about the logic involved, as well as the significance and envisaged consequences of such processing.

For any concerns or to exercise your rights in relation to automated decision-making, please write to us at support@viamatch.ai or phone +442036179750.

# 7. International transfers

In the normal conduct of our business processes your information will be stored and processed in the UK.

If we need to transfer your personal data out of the UK, we will ensure a similar degree of protection is afforded to it.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

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#### 8. Data security

- We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
- You must keep your Platform login details, including any user identification code, password, or other security information, confidential and secure. You must not disclose such information to any third party.

#### 9. Data retention

# How long will you use my personal data for?

- We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

## 10. Your legal rights

- Individuals have certain legal rights, which are briefly summarised at Schedule 2, in relation to any of their personal data which we hold.
- If you wish to exercise any of your rights please contact us in the first instance.
- You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

# Schedule 1

Purpose/Activity	Type of Data	Lawful basis for processing
To register you as a new user of the Platform	Identity Data, Contact Data, Technical Data	Performance of a contract with you; Legitimate Interest (to facilitate user registration and access)
To provide job opportunities and evaluate applications	Identity Data, Contact Data, Qualifications and Working Experience Data, Profile Data, Special Categories of Personal Data, Sensitive Data	Performance of a contract with you; Legitimate Interest (to match candidates with job opportunities)
To conduct AI-driven assessments and interviews	Identity Data, Qualifications and Working Experience Data, Profile Data, Sensitive Data	Performance of a contract with you; Legitimate Interest (to access candidate suitability)
To manage our relationship with you which will include (without limitation):	Identity Data, Contact Data	(a) Performance of a contract with you
(a) Notifying you about		(b) Necessary to comply with a legal obligation
changes to our terms, privacy notice, goods or services		(c) Necessary for our legitimate interests (to improve customer service and engagement)
(b) Asking you to leave a review or take a survey		
(c) communicating with our customers about their account and provide customer support		
To ensure compliance with legal and regulatory requirements;	Any category of data, as necessary	Compliance with legal obligations
To enforce compliance with our terms and conditions and applicable law	Any category of data, as necessary	Necessary for our legitimate interests (to protect our legal rights and ensure platform integrity)
To administer and protect our business and the Platform (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of	Technical Data, Profile Data, Usage Data	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
data)		(b) Necessary to comply with a legal obligation
To deliver relevant Platform content and	Identity Data, Contact Data, Usage Data, Marketing and	(a) Consent
advertisements to you and measure or understand the effectiveness of the advertising we serve to you;	Communications Data	(b) Necessary for our legitimate interests (o enhance user engagement and marketing effectiveness)

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To make suggestions and recommendations to you about goods or services that may be of interest to you		
To use data analytics to improve the products/services (including without limitation the Platform), marketing, customer relationships and experiences	Technical Data, Profile Data, Usage Data, Marketing and Communications Data	Necessary for our legitimate interests (to optimise Platform functionality and user experience)
To transfer data to third parties including prospective employers (in accordance with section 5 of this policy)	Any category of data, as necessary	Necessary for our legitimate interests (to facilitate employment opportunities and business operations)

**Consent** means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

#### Schedule 2

#### YOUR LEGAL RIGHTS

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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