

Via Match Candidate Privacy Notice

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This notice explains how Via Match Limited uses the personal data of candidates who use the VIA AI recruitment platform (the "Platform") to find job opportunities. If you are an individual connected with a business that subscribes to the Platform, please see our separate Business Customer Privacy Notice.

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 +44 (0)203 617 9746 or by writing to us at support@viamatch.ai.

Changes to this notice

We keep this notice under regular review. This version was last updated on 20 August 2026. Historic versions can be obtained by contacting 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. 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.

The data we collect about you

We may collect, use, store and transfer the following kinds of personal data about you:

- **Identity Data** includes your first name, last name and other identity data.
- **Contact Data** includes your 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, your right to work and sponsorship requirements, and any other information you listed in your profile.
- **Usage Data** includes information about how you use the Platform, including interaction history and session duration.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties, and communication preferences.
- **Special Categories of Personal Data** includes any details you choose to include in your CV or profile about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, or health.
- **Sensitive Data** includes, where relevant, information about criminal convictions and offences.

How is your personal data collected?

- **Direct interactions**, when you create an account or profile, upload a CV, or correspond with us. Every candidate on Via joins the platform themselves; we do not source candidate data from third parties or scrape it from public sources.
- **Automated technologies**, being Technical Data and Usage Data collected automatically as you interact with the Platform.

Cookies and tracking technologies

When you visit the Platform, we use cookies and similar tracking technologies to collect Technical Data and Usage Data. A cookie is a small text file placed on your device by a website you visit.

When you first visit the Platform, you will be presented with a cookie consent banner allowing you to accept or reject non-essential cookies. Your choice is stored in a cookie called "via-cookie-consent" for 30 days, after which we will ask you again.

- **Strictly necessary cookies** (via-cookie-consent, via-user-data, via-user-firstname): essential to the Platform's operation and cannot be switched off. The last two hold your signed-in identity and expire after 7 days.
- **Analytics cookies** (PostHog, hosted in the EU): used with your consent to understand how the Platform is used. Anonymous and aggregated only if you reject cookies.
- **Marketing cookies** (LinkedIn Insight Tag): used with your consent for advertising conversion tracking and audience building.
- **Testing cookies** (via-ab-id, via-ab-flags): set only while we are running a test of different versions of a page, so that you continue to see the same version. via-ab-id lasts for one year. No such test is running at the time of writing.

How we use your personal data

We will only use your personal data when the law allows us to, most commonly:

- Where we need to perform the contract we have with you.
- Where it is necessary for our legitimate interests, 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.

The purposes for which we use your data, and the lawful basis relied on for each, are set out in the Schedule below.

Disclosures of your personal data

We may share your personal data with:

- Clients of Via Match who are prospective employers or recruiters, in the final stages of the recruitment process.
- The service providers listed under "Who else processes your data" below.
- Subsidiaries or holding companies of Via Match, for general business and shared systems and services.
- Professional advisers including lawyers, bankers, auditors and insurers.
- HM Revenue & Customs, regulators and other authorities, where required.
- Third parties to whom we may sell, transfer or merge parts of our business.

Disclosure of your 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 and accept the match will be assessed by the Platform's AI matching system based on how closely their profile aligns with the job criteria. Up to 30 candidates whose profiles are determined to be a strong match will be included in the top matched candidates pool. At this stage, candidate profiles become visible to our clients. From this pool, up to 5 candidates are put forward as the shortlist for each job opportunity.

Who else processes your data

We share your data with the following service providers. Each processes it on our written instructions under an Article 28 UK GDPR data processing agreement and is contractually required to protect it.

Provider	Purpose	Location
Supabase	Database hosting and authentication	US (safeguards: UK IDTA)
Vercel	Application hosting	US (safeguards: UK IDTA)
OpenAI	Parsing and analysing your CV, the profile conversation, and scoring your profile against role criteria	US (safeguards: UK IDTA)
Anthropic	Processing the content candidates submit to the CV enhancement and interview preparation tools within the Candidate Portal ('Navigator')	US (safeguards: UK IDTA)
LangSmith	Logging and debugging of the AI calls above, including CV content	US (safeguards: UK IDTA)
Brevo	Transactional email	France (EU adequacy)
PostHog	Product analytics	EU (Frankfurt)
Stripe	Payment processing for paid candidate products. Card details are held by Stripe, not by us	Ireland (EU adequacy)
postcodes.io, zippopotam.us, Photon (komoot)	Validating your postcode and converting your location into coordinates, so roles can be matched by distance	UK and EU

No candidate data is used to train any AI model, by us or by any of the providers above.

An up-to-date list of our sub-processors, and the safeguards in place for each, is available on request from support@viamatch.ai.

Automated decision-making

The Platform uses artificial intelligence (AI) systems to screen and shortlist candidates by automatically comparing the information you provide with the requirements of job opportunities posted by our clients. 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.

Scoring is carried out by large language models working to criteria and instructions set by us. The criteria for each role are set by the employer, and their weighting and the instructions given to the models are set by us and do not change unless we change them. No candidate data is used to train those models. Scores are produced by generative models, so a re-run would not necessarily return identical figures. This is why each score is calculated once, at the point a match is generated, and then fixed.

Every shortlist is reviewed by a member of the Via Match operations team before it is shared with a client.

Via Match regularly reviews and updates its AI systems to reduce the risk of bias or unfair discrimination, and applies additional safeguards where special category or sensitive data is relevant.

It is not possible to opt out of AI-based candidate screening and shortlisting, as this is integral to the Platform's operation and necessary for the performance of our contract with you. If you do not wish for your application to be assessed in this way, you may choose not to use our services.

Where automated decision-making is involved, you have the right to:

- Request human intervention in the decision-making process.
- Express your point of view and contest a decision.
- Obtain meaningful information about the logic involved, and the significance and envisaged consequences of the processing.

To exercise these rights, write to us at support@viamatch.ai or phone +44 (0)203 617 9746.

International transfers

We use service providers to operate the Platform, some of which are located outside the UK, including in the United States. The providers and their locations are listed under "Who else processes your data" above.

Where we transfer your personal data outside the UK, we ensure an appropriate safeguard is in place, such as the UK International Data Transfer Addendum to the EU Standard Contractual Clauses, or a UK adequacy finding. Please contact us at support@viamatch.ai if you want further information on the specific mechanism used for a particular transfer.

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.

Data retention

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 the applicable legal, regulatory, tax, accounting or other requirements.

The specific retention periods we apply are:

- **Account and Profile Data, including your CV:** for as long as your account is open, plus 6 years after you close it. We treat an account with no sign-in for 24 months as closed.
- **Match and shortlist records:** for as long as your account is open, plus 6 years after it is closed.
- **Messages exchanged with employers:** for as long as your account is open, plus 6 years after it is closed.
- **Billing data for paid candidate products:** 7 years from the end of the tax year in which the transaction occurred, in line with HMRC record-keeping requirements.
- **Behavioural and analytics data:** 24 months from the date of collection, in aggregated form thereafter.
- **Marketing consent records:** for as long as you remain opted in, plus 3 years after opt-out for suppression purposes.

Schedule: Purposes and lawful basis

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	Performance of a contract with you; Legitimate Interest (to match candidates with job opportunities)
To score and rank your profile against role criteria using large language model tools, and to produce shortlists	Qualifications and Working Experience Data, Profile Data	Performance of a contract with you; Legitimate Interest (operation of the Platform's core recruitment function)
To process special category data contained in your CV or profile	Special Categories of Personal Data	Explicit consent (Article 9(2)(a) UK GDPR), given when you choose to include such details in your CV or profile
To process information about criminal convictions and offences	Sensitive Data	Consent, given when you choose to disclose it (Article 10 UK GDPR and Schedule 1 Part 3 paragraph 29, Data Protection Act 2018)
To manage our relationship with you (notifying you of changes, requesting feedback, customer support)	Identity Data, Contact Data	Performance of a contract; Legal obligation; Legitimate Interest (to improve customer service and engagement)
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	Legitimate Interest (to protect our legal rights and ensure platform integrity)
To administer and protect our business and the Platform	Technical Data, Profile Data, Usage Data	Legitimate Interest (running our business, IT and network security, fraud prevention); Legal obligation
To deliver relevant content and advertisements, and measure their effectiveness	Identity Data, Contact Data, Usage Data, Marketing and Communications Data	Consent; Legitimate Interest (to enhance engagement and marketing effectiveness)

To collect analytics data about Platform usage via cookies and tracking technologies	Technical Data, Usage Data	Consent (non-essential cookies); Legitimate Interest (to understand and improve the Platform, anonymous or aggregated data only)
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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 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. You can obtain further information about how we assess our legitimate interests against any potential impact on you 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: 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.

You will not have to pay a fee to access your personal data or to exercise any of these rights. We may, however, charge a reasonable fee or refuse to comply with your request if it is clearly unfounded, repetitive or excessive.

To exercise any of these rights, please contact us at support@viamatch.ai. We may need to request specific information from you to help us confirm your identity. We try to respond to all legitimate requests within one month; occasionally it could take us longer if your request is particularly complex or you have made a number of requests.

Complaints

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 at support@viamatch.ai.