

# SVAYZ LTD

## Privacy Policy

Version 1.0

Effective date: 26 February 2026

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### 1. Who We Are

SVAYZ Ltd ("SVAYZ", "we", "us", or "our") is a private company limited by shares, incorporated in England and Wales under company number 17001057 and registered office at 124-128 City Road, London, England, EC1V 2NX, United Kingdom.

We operate an AI-powered recruitment platform (the "Platform") that connects employers and recruitment agencies with candidates. Our Platform uses artificial intelligence to assist with candidate matching, ranking, interview conduct, and content generation.

For the purposes of data protection law, SVAYZ Ltd is the data controller in respect of the personal data we collect and process through the Platform, except where we process personal data on behalf of employers or recruitment agencies, in which case we act as a data processor (or, in certain circumstances, a joint controller). The relevant relationship is set out in our Data Processing Agreement with each employer or agency client.

In accordance with Article 37 of the UK GDPR and EU GDPR, we have appointed an external Data Protection Officer (DPO):

**Data Protection Officer: [DPO NAME TO BE APPOINTED]**

Email: [dpo@svayz.com / DPO provider email]

**EU Representative: [EU REPRESENTATIVE TO BE APPOINTED]**

ICO Registration Number: [ICO REGISTRATION NUMBER]

Contact: infra-admin@svayz.com

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### 2. About This Policy

This Privacy Policy explains how we collect, use, share, and protect your personal data when you use our Platform, whether as a candidate, employer, or recruitment agency.

We are committed to protecting your personal data in accordance with the UK GDPR (as amended by the Data (Use and Access) Act 2025), the Data Protection Act 2018, the EU GDPR, PECR 2003, and the EU Artificial Intelligence Act (Regulation (EU) 2024/1689).

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### 3. Personal Data We Collect

#### 3.1 Candidates

Data Category	Examples	Source
Identity Data	Full name, profile photo, pronouns, headline, bio, profile slug	You provide this during registration
Contact Data	Email, phone, location, LinkedIn URL, GitHub URL, portfolio URL, website	You provide this; some verified via Clerk
Professional Data	CV files and parsed content (skills, experience, education, seniority, years per skill, projects, companies), work experience, certifications, languages, cover letters	You upload or enter this; AI parses CV content
Interview Data	AI interview recordings (audio/video), transcripts, duration, questions, answers, session metadata, consent status	Generated during AI interviews with consent
AI-Generated Data	Suitability scores (overall, technical, communication, culture fit, professionalism), AI insights, recommendations, strengths, concerns, match scores/reasons	Generated by AI from your Professional/Interview Data
Portfolio Data	Project titles, descriptions, URLs, thumbnails, media, technologies, categories, metrics	You provide this when adding portfolio items
Prediction Data	Predicted acceptance likelihood, predicted next pipeline stage, predicted time to hire	Generated by AI as decision-support tools
Sourcing Data	Sourcing consent, frequency limit, response rate, match scores, sourcing messages	Generated when matched to roles; consent set by you
Profile Interaction Data	Profile views (viewer, source, duration), profile saves (saver, job, notes)	Generated when employers interact with your profile
Email Engagement Data	Opens, clicks, timestamps	Generated by email tracking; opt out via privacy settings
Search History	Queries, filters, result counts	Generated when you search the Platform
Account Data	Clerk ID, creation date, last active, onboarding status, profile completeness,	You provide or configure this

	verification statuses, notification/email preferences, timezone, salary preferences	
Technical Data	IP address, browser, OS, device info, referrer URL	Collected automatically
Usage Data	Page views, feature interactions, job views, analytics events, recommendation interactions, chatbot logs	Collected automatically
Learning Path Data	Target roles, skills gaps, readiness scores, learning resources	Generated when using career development tools
Application Data	Applications, status, pipeline stages, screening/knockout answers, source attribution, UTM data, rejection/archive data	Generated when you apply for roles

### 3.2 Employers and Recruitment Agencies

Data Category	Examples	Source
Business Identity Data	Company name, description, industry, size, website, logo, location, social links, benefits, culture, theme	You provide during setup
Contact Data	Email, phone number	You provide during registration
Job Posting Data	Titles, descriptions, requirements, skills, salary, pipeline config, SLA thresholds	You provide when creating postings
Pipeline Data	Applications, stages, metrics, scheduling, scorecards, booking links, offers, talent pools	Generated as you manage recruitment
Calendar Integration Data	Encrypted OAuth tokens, provider, calendar ID, email, sync status	Stored when you connect Google/Microsoft calendar; encrypted AES-256-GCM
Email Campaign Data	Campaign names, subjects, targeting, A/B tests, sequences, templates	You create when running outreach
Email Analytics Data	Open/click/reply/unsubscribe/bounce rates, delivery times, engagement events	Generated from campaign activity
Hiring Analytics Data	Hires, time to hire, costs, AI credits, stage metrics, estimated savings	Generated from recruitment activity
Billing Data	Stripe customer ID, subscription, invoices, usage	Managed by Stripe

Account Data	Org ID, team members, invitations, roles, permissions	You provide or configure
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### 3.3 Special Category Data

We do not intentionally collect special category data. SVAYZ does not perform facial expression analysis, emotion detection, physiognomic inference, voice-based personality profiling, or biometric identification.

## 4. How and Why We Use Your Personal Data

Purpose	Data Categories	Lawful Basis
Account creation and management	Identity, Contact, Account	Contract (Art. 6(1)(b))
Core Platform services	Identity, Professional, Application, Pipeline	Contract (Art. 6(1)(b))
AI interviews	Interview, AI-Generated	Explicit consent (Art. 6(1)(a))
AI scoring, ranking, matching	Professional, Interview, AI-Generated, Prediction	Legitimate interests (Art. 6(1)(f)); formal LIA conducted
Sharing candidate data with employers	Identity, Professional, Interview, AI-Generated	Contract (Art. 6(1)(b)); legitimate interests
Payment processing	Billing	Contract (Art. 6(1)(b))
AI-generated content	Professional, Job Posting	Legitimate interests (Art. 6(1)(f))
Platform analytics	Usage, Technical	Legitimate interests (Art. 6(1)(f))
Email delivery and tracking	Contact, Email Engagement	Legitimate interests (Art. 6(1)(f)); opt out available
Vector search and AI matching	Professional, Interview	Legitimate interests; Contract
Error monitoring and session replay	Technical, Usage	Legitimate interests (Art. 6(1)(f))
Interview scheduling	Calendar Integration	Contract (Art. 6(1)(b))
Rate limiting	Technical (IP addresses)	Legitimate interests (Art. 6(1)(f))

## 5. Automated Decision-Making and Profiling

### 5.1 AI Features

**Candidate Ranking and Scoring. AI analyses Professional and Interview Data to generate suitability scores as one factor in recruitment decisions.**

**AI-Conducted Interviews. With explicit consent, AI conducts initial interviews via video, audio, or chat.**

**Candidate-Job Matching. AI matches candidates to roles based on profile data vs employer requirements.**

**AI-Generated Content. AI generates job descriptions, CV summaries, and interview prep as drafts for human review.**

## Prediction Models. AI generates predictions (acceptance likelihood, next stage, time to hire) as decision-support tools.

### 5.1A Legal Framework (DUAA 2025)

The Data (Use and Access) Act 2025 amended UK GDPR automated decision-making provisions (Articles 22A-D, effective 5 February 2026). The restriction on solely automated decisions now applies only to decisions based entirely or partly on special category data (Article 22B). SVAYZ does not make hiring decisions solely by automated processing.

### 5.2 Human Oversight

- (a) Right to human review of any AI-generated assessment.
- (b) Right to contest an AI-generated assessment.
- (c) Right to an explanation (within 30 days).
- (d) Right to make representations (Article 22C DUAA 2025).

### 5.3 AI Model Provider

Google Gemini (Google LLC) powers our AI features. Data processed as sub-processor under DPA. Not used to train Google's general AI models.

### 5.3A Prohibited AI Practices

In accordance with EU AI Act Article 5, SVAYZ does not use: emotion recognition, social scoring, real-time biometric identification, or inference of protected characteristics from proxy data.

### 5.4 AI Bias Monitoring

SVAYZ conducts self-assessment bias reviews across protected characteristic proxies. Bias audit logs maintained. Reports to [abuse@svayz.com](mailto:abuse@svayz.com).

### 5.5 DPIAs

Data Protection Impact Assessments completed for each AI feature per Article 35 UK GDPR and ICO AI recruitment guidance (November 2024).

## 6. Data Retention

Data Type	Retention Period	Notes
Candidate account data	Account duration + 12 months	Allows reactivation
CV files and parsed data	Account duration	Deleted on account deletion/erasure; includes Qdrant embeddings
AI interview recordings (audio/video)	12 months from interview	Automated deletion via cron job
AI interview transcripts and analysis	12 months from interview	Deleted with recordings
AI-generated scores and assessments	12 months from generation	Full deletion including scores, match data, predictions
Employer account data	Account duration + 24 months	Legal/financial obligations
Payment records	7 years	UK tax and accounting law
Analytics and usage data	24 months	Aggregated after 12 months

Email campaign data	24 months	Includes engagement metrics
Customer support correspondence	24 months	Includes chatbot logs
Audit logs	90 days	Security monitoring
Rate limiting data (IP addresses)	60 seconds	Auto-expires in Upstash Redis

GDPR erasure requests processed within 30 days, including database, vector DB, file storage, and cached copies.

## 7. International Data Transfers

Transfer Risk Assessments (TRAs) conducted for each transfer. UK IDTA or UK Addendum used for non-adequate countries.

Recipient	Location	Purpose	Safeguard
Google LLC (Gemini AI)	United States	AI processing	EU-U.S. DPF; UK Extension; UK IDTA
Vercel Inc.	US / EU (Frankfurt)	Hosting, blob storage	UK IDTA
Neon Inc.	EU (Frankfurt)	PostgreSQL database	Data remains in EU
Clerk Inc.	United States	Authentication	UK IDTA
Stripe Inc.	US / Ireland	Payments	EU-U.S. DPF; UK IDTA
Sentry	EU (Germany)	Error tracking, session replay	Data remains in EU
Resend Inc.	United States	Email delivery	UK IDTA
Qdrant	EU (Frankfurt)	Vector database	Data remains in EU
Upstash Inc.	European Union	Rate limiting (Redis)	Data remains in EU
Inngest Inc.	United States	Background jobs	UK IDTA
Google Calendar API	United States	Interview scheduling	EU-U.S. DPF; UK Extension
Microsoft Graph API	US / EU	Interview scheduling	EU-U.S. DPF; UK IDTA
SVAYZ contractors	Ukraine	Administration	UK IDTA; VPN; RBAC

## 8. Who We Share Your Data With

We do not sell your personal data. Sharing occurs with: employers/agencies (for recruitment), service providers (sub-processors per Section 7), Stripe (payment processing), professional advisers, legal/regulatory bodies, and in business transfers.

## 9. Cookies and Similar Technologies

See our separate Cookie Policy for full details. Summary: strictly necessary cookies (Clerk authentication, Stripe payments), Sentry error monitoring with session replay (10% sample

rate), Vercel Speed Insights (cookieless), email tracking pixels, and browser local/session storage for caching.

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#### 10. Your Rights

Under UK GDPR (as amended by DUAA 2025) and EU GDPR: access (Art. 15), rectification (Art. 16), erasure (Art. 17), restriction (Art. 18), portability (Art. 20), objection (Art. 21), automated decision-making rights (Arts. 22A-D), and withdrawal of consent (Art. 7(3)).

Self-service tools available: data export, account deletion, selective deletion.

Contact: [infra-admin@svayz.com](mailto:infra-admin@svayz.com). Response within 1 calendar month.

Complaints: DPO first, then ICO ([ico.org.uk](https://ico.org.uk)) or relevant EU/EEA supervisory authority.

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#### 11. Children's Privacy

Platform not directed at under-18s. No knowing collection of children's data.

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#### 12. Data Security

Measures include: TLS/SSL in transit, AES-256-GCM at rest for credentials, role-based access controls, Bitwarden password management, rate limiting (Upstash Redis), security reviews, 72-hour breach notification, SSL/TLS database connections, content sanitisation (XSS prevention).

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#### 13. Changes to This Privacy Policy

Material changes notified via Platform notice, email, and updated date. Version history available on request.

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#### 14. Contact Us

SVAYZ Ltd

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Company number: 17001057

Email: [infra-admin@svayz.com](mailto:infra-admin@svayz.com)

AI explanation requests: [support@svayz.com](mailto:support@svayz.com)

AI bias reports: [abuse@svayz.com](mailto:abuse@svayz.com)