

HIROS PRIVACY POLICY

Effective Date: 4th April 2026

This Privacy Policy explains how Hiros (DB Global Limited) (“Hiros”, “we”, “us”, or “our”) collects, uses, and protects personal data when you use our Platform or interact with us.

1. About Us

DB Global Limited is a company registered in England and Wales (Company No. 16276191), with a registered address at 15 Cavendish Road, London, NW6 7XT.

If you have any questions about this Privacy Policy, please contact: legal@gethiros.com

2. Scope of this Policy

This Privacy Policy applies to:

- Users of the Hiros Platform (hirers / clients)
 - Candidates whose data is processed via the Platform
 - Visitors to our website
 - Any individuals who interact with us in a business context
-

3. What Personal Data We Collect

3.1 Information You Provide

We may collect:

- Name, email address, company, job title
 - Account login details
 - Job descriptions and hiring requirements
 - Communications with us or via the Platform
-

3.2 Candidate Data

We process data relating to candidates, including:

- Name and professional profile information

- Employment history and skills
 - Publicly available professional data (e.g. LinkedIn)
 - Engagement status (e.g. interested / not interested)
 - Communications via the Platform
-

3.3 Automatically Collected Data

We may collect:

- IP address
 - Device and browser information
 - Usage data (e.g. activity on the Platform)
 - Cookies and similar technologies
-

4. How We Use Personal Data

We use personal data to:

- Provide and operate the Platform
 - Match candidates to roles using AI tools (including “Rose”)
 - Facilitate communication between hirers and candidates
 - Improve our product, features, and performance
 - Provide customer support
 - Ensure security and prevent misuse
 - Comply with legal obligations
-

5. Legal Basis for Processing (GDPR)

We rely on the following legal bases:

- **Contract** – to provide the Platform to our users
 - **Legitimate Interests** – to improve services, match candidates, and operate efficiently
 - **Legal Obligation** – where required by law
 - **Consent** – where required (e.g. certain communications or cookies)
-

6. AI and Automated Processing

Hiros uses AI systems (including our AI recruiter “Rose”) to:

- analyse job requirements
- identify and rank potential candidates
- generate communications

These systems assist decision-making but do not make final hiring decisions.

Users are responsible for reviewing outputs before acting on them.

7. How We Share Personal Data

We may share personal data with:

7.1 Service Providers

- Cloud hosting providers
- AI providers (e.g. OpenAI, Anthropic, Google)
- Infrastructure providers (e.g. Vercel)
- Analytics tools

7.2 Customers (Hirers)

- Candidate data is shared with hirers using the Platform for hiring purposes

7.3 Legal Authorities

- Where required by law or to protect rights and safety
-

8. International Data Transfers

Some of our service providers may process data outside the UK or EEA.

Where this happens, we ensure appropriate safeguards are in place, such as:

- Standard Contractual Clauses (SCCs)
 - Adequacy decisions where applicable
-

9. Data Retention

We retain personal data only as long as necessary to:

- provide the Platform

- fulfil the purposes outlined in this policy
- comply with legal obligations

We may retain anonymised or aggregated data indefinitely.

10. Data Security

We implement appropriate technical and organisational measures to protect personal data, including:

- access controls
- encryption where appropriate
- secure infrastructure

However, no system is completely secure.

11. Your Rights

Under data protection law, you may have the right to:

- access your personal data
- correct inaccurate data
- request deletion
- restrict or object to processing
- request data portability

To exercise your rights, contact: legal@gethiros.com

12. Cookies

We use cookies and similar technologies to:

- operate the Platform
- analyse usage
- improve performance

You can manage cookie preferences through your browser settings.

13. Third-Party Links

The Platform may contain links to third-party websites. We are not responsible for their privacy practices.

14. Changes to this Policy

We may update this Privacy Policy from time to time. We will notify users of material changes where appropriate.

15. Contact

If you have any questions about this Privacy Policy or how we handle your data, please contact:

legal@gethiros.com