PRIVACY POLICY – GEEKHUNTER

1. PRIVACY POLICY

1.1 Purpose

GeekHunter values the privacy of its users and has developed this Privacy Policy to demonstrate its commitment to protecting personal data, in accordance with the General Data Protection Law (Law No. 13.709/2018 – LGPD), the Brazilian Civil Rights Framework for the Internet (Law No. 12.965/2014), and other applicable legislation.

This document describes how GeekHunter collects, uses, shares, and stores personal information in the context of its services.

1.2 Scope of application

This Policy applies to everyone whose personal data we process, including:

- **Professionals:** candidates who use GeekHunter to look for job opportunities or take part in selection processes, whether run by Clients or by GeekHunter itself.
- **Company Users:** recruiters, employees and administrators of Clients or partner companies who use the platform to attract professionals or run selection processes.
- **Integrated Third Parties:** providers of technical assessments and video conferencing, job board partners, external recruiters and other partners connected to the platform.
- **Visitors:** people who browse our websites or pages without creating an account.

1.3 Conditions of use and relation with the Terms

By using our services, you declare that you are over 18 years old, as well as emancipated or duly represented/assisted if legally incapable.

If you do not agree with this Policy, we recommend that you do not use the services. This Policy complements the Terms of Use. In case of conflict, applicable legislation shall prevail.

2. DEFINITIONS

For the purposes of this Policy, the following definitions apply:

- **User:** any natural person who uses or visits GeekHunter's websites and/or applications, over 18 years old, as well as emancipated or duly represented/assisted if legally incapable.
- **Professional / Candidate:** User who uses GeekHunter to search for opportunities or apply for vacancies at Client companies or GeekHunter itself.
- **Company User:** User who uses GeekHunter for actions such as attracting, managing selection processes, and hiring professionals.
- **Client:** A GeekHunter client company that has an active service agreement.
- **Personal Data:** Any information provided and/or collected by GeekHunter that identifies or may identify an individual.
- **Sensitive Personal Data:** Data on racial or ethnic origin, religious belief, political opinion, trade union membership, health, sexual life, genetic or biometric data.
- **Purpose:** Objective of each act of processing personal data.
- **Necessity:** Justification for why it is strictly necessary to collect personal data to achieve a given purpose, avoiding excesses.
- **Controller:** The one who decides on the purposes and means of processing personal data.
- **Joint Controllers:** Two or more controllers who jointly decide the processing.
- **Processor:** Natural or legal person, public or private, who processes personal data on behalf of the controller.
- **Talent Pool:** database composed of the profiles of Professionals registered or enriched by the Platform, accessible by GeekHunter and, in certain situations, by Client companies, according to the purposes set forth in this Privacy Policy and in the Terms of Use.
- **Legal Bases:** Legal grounds that make the processing of personal data by GeekHunter legitimate.
- **Consent:** Express and unequivocal authorization given by the data subject for the processing of personal data, when required by law.
- **AI (Artificial Intelligence):** automated resources applied by GeekHunter to support interviews, enrich profiles, generate recommendations, perform matching, detect fraud, and optimize the Services.

3. ROLES IN DATA PROCESSING

Data processed by GeekHunter and intelligence generated by the system (such as metrics, market analysis, matching, reports, and aggregated insights): these are the property of GeekHunter, and may be made available in a shared manner with Clients to support recruitment and selection decisions.

Data processed outside the platform (exports, integrations with other systems, or use in external tools) are the sole responsibility of the Client company, which may adopt its own privacy policies and purposes of processing, and must always respect the rights of data subjects.**Sensitive personal data** is the exception: even when exported or accessed through an integration, including through the GeekHunter API, it may only be processed by the Client company for the purpose of the selection process for which it was collected.

The candidate may exercise their rights either with the Client company that performed the registration or directly with GeekHunter.

3.1 Controller

GeekHunter acts as a **controller** when it defines the purposes and means of processing, such as in:

- creation of a profile/registration on the GeekHunter platform;
- maintenance of the Talent Pool;
- support and assistance;
- usage and security metrics;
- institutional communication;
- marketing activities, when applicable and with consent;

GeekHunter acts as the controller of the personal data of candidates contained in its Talent Pool, which are processed for the purpose of creating, maintaining, and improving professional profiles, and may be shared with Client companies, in accordance with legitimate recruitment and selection purposes.

3.2 Joint Controller

GeekHunter acts as a **joint controller** when it defines, together with Client companies, the purposes and means of processing, such as:

- When candidates specifically apply for a Client company's recruitment process through a page on GeekHunter's platform that is dedicated to a specific job position, even when the hiring is made directly by the company.

In the case of joint controllership, each party is responsible only for the processing it performs, according to its own decisions and legal obligations. There is no joint liability or binding relationship between the parties, except where expressly provided by law.

3.3 Processor

When the **Client** manually or automatically (via API integration) inputs professional data, the Client becomes an **independent controller** of the personal data of the professional in question, assuming the obligations and responsibilities arising from this condition and committing to fully comply with applicable laws, especially Law No. 13,709/2018 (General Data Protection Law – LGPD).

4. COLLECTION AND USES OF PERSONAL INFORMATION

4.1 Information collected from Company User

The Company User is aware that their data will be collected through forms or through the websites operated by **GeekHunter**, for the proper registration on the platform.

When the Company User registers and/or fills out forms provided by **GeekHunter**, certain requested Personal Data will be kept confidential and used only for the purpose that motivated the registration, as shown in the following table:

MOMENT	CATEGORY OF PERSONAL DATA	PURPOSE	LEGAL BASIS
Newsletter Subscription	Name; Email.	To access content and receive hiring tips (Newsletter).	Consent
Commercial contact	Name; Corporate email; Phone.	To collect the minimum and necessary information in order to return the commercial contact.	Consent
Company user registration	Name; Corporate email; Phone.	To allow us to share the Recruiter's name and connect the recruiter with candidates participating in selection processes. Also to control access to the platform and its features.	Legitimate interest

Website Browsing	IP address; Cookies.	To optimize the functionality of our websites.	Legitimate interest

4.2 Information collected from Professionals by GeekHunter

The Professional is aware that they provide their information consciously and voluntarily through forms or the websites/applications operated by GeekHunter.

In some cases, Clients may request specific recruitment services from GeekHunter aimed at promoting diversity in their companies. To enable these services, it may be necessary to collect **sensitive personal data** related to certain demographic groups. We emphasize that GeekHunter **does not support discriminatory practices** and that this type of processing occurs exclusively on behalf of the Client, with the purpose of fostering more diverse and inclusive environments.

In diversity initiatives requested by Clients, GeekHunter may **collect sensitive personal data** (e.g., PwD – People with Disabilities) **exclusively upon your specific, explicit, and optional** consent, for the purpose of **promoting affirmative actions**. Refusal will not affect the use of the platform, and the professional may **revoke** consent at any time.

This data may be shared with the Client company responsible for the job and processed by processors that carry out stages of the selection process on its behalf, such as eligibility checks for affirmative jobs or jobs reserved for PwD, always under contracts that bind them to that purpose and prohibit any use of the data for their own purposes.

If the candidate chooses to directly send GeekHunter information of a sensitive nature, such submission may be interpreted as an acknowledgment and agreement to the processing of such data, in accordance with this Privacy Policy.

When the Professional registers and/or fills out forms provided by GeekHunter, the requested personal data will be kept confidential and used **exclusively for the purposes that justified its collection**, as follow:

MOMENT	CATEGORY OF PERSONAL DATA	PURPOSE	LEGAL BASIS
Newsletter Subscription	Name; Email.	To access content and receive job market tips (Newsletter).	Consent
		So that potential employer	

Application to affirmative jobs/Initial Registration/Profile Maintenance	Self-declaration as a PwD (Person with Disability).	companies can match job requirements to their quotas, under the terms of the CLT (Consolidation of Labor Laws – Decree-Law No. 5.452/43) and Law No. 8.231/91.	Consent
Profile Maintenance	Profile picture.	For better organization in the selection and recruitment process for potential companies.	Consent
Profile Maintenance	Last and/or current salary; Salary expectation; Job title; Where you work and/or have worked; Education level; Certificates; Technologies and skills you know; Programming languages.	To keep your résumé up to date and, consequently, to better direct your profile in the selection and recruitment process for potential companies.	Consent
Website Browsing	IP address; Cookies.	To optimize the functionalities of our website, as well as to provide job searches to the user according to their location.	Legitimate interest
Application/Initial Registration	Full name; Email; Mobile number; LinkedIn; Salary expectation; Résumé; Desired type of contract.	To collect the minimum and necessary information about the candidate so that the Client company or companies can communicate with them and continue their selection process.	Consent
		The purpose is defined by the company and is	

Job Application	CPF; RG; Date of birth.	shown at the time of collection. The collection may be for identity validation, fraud prevention, compliance with a legal or regulatory requirement, or preparation for admission or hiring, among others.	Consent
Job Application	CPF; RG; Date of birth.	Sharing, with the companies whose jobs the professional applies to, of the data they already provided in earlier applications, for identity validation and fraud prevention in selection processes.	Legitimate interest

When applying for a job, the professional becomes part of both GeekHunter's Talent Pool and the recruiting company's talent database. This allows for the retention of their data even after the conclusion of the selection process.

If the candidate chooses to share their CPF, RG and date of birth, this data is not visible in GeekHunter's Talent Pool. It is disclosed only in the context of the selection processes the professional takes part in.

When the professional has already provided their CPF, RG or date of birth in an earlier application, GeekHunter shares this data with the other companies whose jobs they apply to, even if the company does not request it, on the basis of legitimate interest, for identity validation and fraud prevention in selection processes. The data is shared only after the application is confirmed, and the professional may object to it at any time by emailing dpo@geekhunter.com.br.

By registering through a GeekHunter subdomain, the professional may choose—at the time of registration or later—to keep their profile public across the entire talent pool or restricted only to the positions of interest. At any time, they may also request the deletion of their data from the GeekHunter platform.

The Client company, in turn, may choose not to keep its database of professionals originating exclusively from its own selection processes in this Talent Pool. In this case, it may request the removal of such visibility. However, this decision will also result in the loss of access to GeekHunter's Talent Pool, limiting its ability to view available profiles beyond those already registered directly in its processes.

GeekHunter also automatically collects certain information through cookies and similar technologies when Visitors access our website. Such data may include: Internet Protocol (IP) address, browser type, internet service provider, referring and destination URLs, operating system, date and time of access, search terms, location and language preferences, device identifiers, and system configuration information.

To protect our websites against automated and abusive access, Cloudflare may also set strictly necessary security cookies (such as __cf_bm and cf_clearance) and collect technical browser signals when running checks such as Turnstile.

We also use Microsoft Clarity to understand how Visitors and Users interact with the Platform and to improve their experience. It sets its own cookies (such as _clck and _clsk) and records browsing data such as clicks, scrolling, pages visited, IP address, and device information, and may produce session recordings. Sensitive content displayed on screen, such as candidate data, is masked before it is sent.

4.3 Integration with Third-Party Services

Some procedures performed by GeekHunter depend on integration with third-party services or applications (such as LinkedIn, WhatsApp, email providers, and telecommunications operators). In such cases, the processing of data carried out by these third parties is governed by their own privacy policies and terms of use. GeekHunter is not responsible for contractual or legal violations by third parties, nor for any data processing they perform independently.

4.4 AI-Assisted Interviews and Profile Enrichment

4.4.1 Voice or Text Interviews Supported by AI

GeekHunter may conduct video, voice, or text interviews supported by artificial intelligence agents. In such cases, we collect:

- Interview content and respective transcriptions;
- Technical metadata, such as date, time, duration, language, device type, and IP address;

- Automatically generated annotations and inferences, such as skill extraction, estimated seniority, job matching, key topics, and quality indicators.

4.4.2 Automatic Profile Enrichment from Public Sources and Connected Accounts

To keep the Professional's profile more complete and up to date, we may complement information through:

- **Publicly accessible sources**, such as professional profiles and web pages (e.g., LinkedIn, personal websites, public portfolio repositories), respecting privacy settings and platform terms of use, and using them in good faith, transparency, and for legitimate purposes;
- **Connected accounts**, when the Professional chooses to link a third-party account to the platform. In such cases, we only collect the information authorized at the time of connection. We do not collect passwords. The connection can be revoked at any time within the platform or through the third-party settings.

4.4.3 Purposes

All data collected during AI-assisted video, voice, or text interviews are processed in accordance with the LGPD and used exclusively to:

i. Update and maintain the Professional's profile complete and current;
ii. Perform screening, matching, and profile analysis to support decisions in Client companies' selection processes;
iii. Offer job recommendations, communication, and support;
iv. Generate aggregated and anonymized statistics and insights on market trends and performance;
v. Improve models, workflows, and service quality, including fraud prevention and security.

4.4.4 Legal Bases

The processing of data collected during interviews is based on the following legal grounds:

- **Contract execution:** preliminary procedures necessary for the provision of services to the Professional and Client companies.
- **Legitimate interest:** continuous improvement, security, and statistical purposes, with impact assessments and opt-out mechanisms when applicable.
- **Specific consent:** required for any sensitive personal data that may be collected or processed.

4.4.5 Sensitive Data

We do not request sensitive personal data during interviews, except when strictly necessary and optional in diversity programs requested by Clients. In such cases, processing occurs only with specific and explicit consent, for a defined purpose, and may be revoked at any time upon express request, without prejudice to the validity of prior processing.

4.4.6 Sharing with Client Companies

We make available to Client companies only the information necessary for the selection process. Sensitive personal data, when collected with the Professional's consent, is shared only with the Client company responsible for the job and with the processors that carry out stages of that selection process on its behalf, strictly for that purpose. Internal notes that are not necessary for that purpose remain restricted to GeekHunter.

4.4.7 AI Providers, Collection, and Recording

We may use providers acting as data processors for transcription, natural language processing, verification, and infrastructure. We require confidentiality, security, and prohibition of use for their own purposes, including model training, unless explicit, highlighted, and specific consent is granted by the data subject.

4.4.8 Access

The professional may request access to the transcriptions associated with their profile via email at dpo@geekhunter.com.br.

4.4.9 Retention

Transcriptions, annotations, and enriched data are retained for as long as necessary to fulfill the indicated purposes and comply with applicable legal timeframes.

Upon the data subject's request—and when no other legal basis justifies retention—we delete or irreversibly anonymize the data.

If deletion is not possible due to legal obligations, fraud prevention, security, or the exercise of legal rights, we block usage for non-essential purposes and retain only the minimum required, informing the grounds for retention.

For data already shared with co-controllers (Client companies, in the cases listed in item 3.2), the data subject must address their request directly to them. We will, when applicable, inform the categories of third parties with whom we have shared the data.

5. SHARING AND PROCESSING OF USERS' PERSONAL INFORMATION

5.1 Circumstances of Sharing

GeekHunter may disclose Users' Personal Data to third parties under the following circumstances and within the limits required and authorized by law:

i. **Client Companies**, when you, the Professional, apply for a selection process directly through the GeekHunter platform;
ii. **Companies belonging to the economic group of Howdy.com Inc. (the parent and controlling group of GeekHunter)**, in cases of merger, acquisition, or sale, when a legitimate purpose exists. In such cases, the purpose will be specified in the respective privacy notice;
iii. **Suppliers and service providers** (only when strictly necessary), referred to as “Processors” under applicable law, whom we engage to help us perform our activities;
iv. **Job posting platforms** for vacancy publication, and partners through integrations that may be used independently by the Client Company or via GeekHunter;
v. Companies and individuals contracted to perform certain activities and services on behalf of **GeekHunter**;
vi. **Authorities/government agencies**, in cases of judicial measures, investigations, or legal processes;
vii. For administrative purposes, such as research, planning, service development, security, and risk management.

5.2 Processors Currently Used

To ensure the best execution of GeekHunter's services, Users' Personal Data are shared with processors in the following categories:

- **Infrastructure, hosting and security**: cloud storage, internal documents, content delivery and protection of our websites;
- **Artificial intelligence**: resume and interview analysis, AI reasoning and semantic search. Whenever possible, personally identifiable information is removed before it is sent;
- **Communication and support**: email, SMS and WhatsApp delivery, voice calls and support;
- **Marketing, sales and CRM**: marketing management, customer relationship management and prospecting;

- **Usage analytics, monitoring and data**: browsing analytics and session recording (with sensitive content masked), error monitoring, feature management and data intelligence;
- **Recruitment and assessment**: candidate search, technical interviews and validations in selection processes;
- **Administrative and financial management**: billing, contract signing and HR management.

The complete, up-to-date list of processors, with the purpose of each one and a link to its privacy policy, is available on the Data Processors page.

In cases of sharing Personal Data with third parties, all entities mentioned must use the shared Personal Data consistently and in accordance with the purposes for which they were collected (or for which the User previously provided consent), as determined by this Privacy Policy, other website or country-specific privacy statements, and all applicable privacy and data protection laws.

5.3 Financial Institutions and Insurance Companies

When the recruiting company, a **GeekHunter** Client, is a financial institution or an insurance company, in accordance with the legal rules and regulations of the Central Bank of Brazil (BACEN) and SUSEP – the Superintendence of Private Insurance, your data may be consulted for a possible analysis related to illicit activities such as money laundering or terrorism (BACEN Circular No. 3978 and SUSEP Circular No. 612/2020).

6. INTERNATIONAL DATA TRANSFER

Currently, we use Google Cloud Platform and Amazon Web Services (AWS), both located in the United States of America (USA). Data entered into our platform is stored there, constituting an international data transfer under the terms of the LGPD.

In addition, every request to our websites passes through Cloudflare's global network, which provides content delivery and security services and may process data such as the IP address in data centers located outside Brazil.

Our artificial intelligence features also rely on providers that process data outside Brazil: MixLayer, for resume and interview analysis and AI reasoning, and OpenAI, for generating the embeddings used in semantic search. Personally identifiable information is removed from the content before it is sent to OpenAI.

Browsing data collected by Microsoft Clarity, such as IP address, cookie identifiers, and session recordings, is also processed by Microsoft outside Brazil, mainly in the United States of America (USA).

We adopt all applicable technical, organizational, and legal measures to ensure compliance and the security of stored data. Questions may be directed to our DPO at dpo@geekhunter.com.br.

Personal data may also undergo international transfer through the third-party services listed in the section “COLLECTION AND USE OF PERSONAL INFORMATION.”

7. LEGAL REASONS FOR DISCLOSING YOUR DATA

In certain circumstances, **GeekHunter** may disclose professionals' Personal Data, to the extent necessary or appropriate, to government bodies, advisors, and other third parties, in order to comply with applicable law or with a judicial order or subpoena, or if GeekHunter believes in good faith that such action is necessary to:

- Comply with a legal requirement that mandates such disclosure;
- Investigate, prevent, or take measures related to suspected or actual illegal activities, or cooperate with public authorities, or protect national security;
- Enforce its contracts;
- Investigate and defend against any third-party claims or allegations;
- Protect the security or integrity of the services (for example, sharing with companies facing similar threats);
- Exercise or protect the rights, property, and safety of **GeekHunter** and its affiliates;
- Protect the rights and personal safety of its employees, users, or the public;
- In the event of sale, purchase, merger, reorganization, liquidation, or dissolution of **GeekHunter**.

GeekHunter may challenge such requests if it considers them excessive, vague, or made by incompetent authorities.

8. SECURITY OF PERSONAL INFORMATION

All Personal Data is stored in **GeekHunter**'s database or in compliant cloud databases maintained by contracted service providers.

GeekHunter and its suppliers use a variety of security procedures to protect the confidentiality, security, and integrity of Personal Data.

While GeekHunter monitors its systems for vulnerabilities and attacks, the User acknowledges that no safeguard can fully guarantee against unauthorized access, disclosure, alteration, or destruction of data.

In the event of a security incident that could cause significant risk or harm, **we will take measures to mitigate the effects and will notify the ANPD (National Data Protection Authority) and affected data subjects, when required**.

9. DATA RETENTION

GeekHunter retains Users' Personal Data while their registration remains active and for as long as necessary to carry out its services or fulfill the purposes described in this Policy.
We may retain the data even after a deletion request or the end of the established periods when necessary to:

- Comply with legal or regulatory obligations;
- Resolve disputes;
- Maintain security and prevent fraud or abuse;
- Ensure contract enforcement.

10. LEGAL BASES FOR PROCESSING

GeekHunter only processes Personal Data when legally authorized or with the User's express and unequivocal consent. The applicable legal bases are:

- **Consent:** collected expressly and unequivocally on our platform.
- **Contract execution:** when processing is necessary to enter into or fulfill a contract with the User.
- **Legitimate interests:** including protecting users and GeekHunter from threats, complying with applicable law, exercising legal rights in judicial or arbitration proceedings, managing business operations and transactions, improving services, and helping users find economic opportunities — provided such processing does not violate your rights and freedoms.

The User has the right to deny or withdraw consent at any time. GeekHunter may cease providing services in such cases. Where GeekHunter's Clients act as independent data controllers, data deletion requests must be directed to the Client.

For questions about legal bases, contact our Data Protection Officer (DPO) at

dpo@geekhunter.com.br.

11. RIGHT TO ACCESS AND CONTROL YOUR PERSONAL DATA

GeekHunter offers Users several options regarding the Personal Data collected, processed, and stored, including the ability to delete and/or correct such data. The User may:

i. **Delete data:** Request the deletion of certain Personal Data (for example, if they are no longer necessary to provide services).
ii. **Change or correct data:** Edit or request the editing of certain Personal Data. The User may also request updates, changes, or corrections in specific cases, especially if the data are incorrect.
iii. **Object to, limit, or restrict data use:** Request that the use of all or part of their Personal Data be stopped (for example, if we no longer have the right to use them), or limit our use of such data (for example, if the data are inaccurate or unlawfully stored), noting that GeekHunter may still process Personal Data in accordance with the legal bases listed in this document.
iv. **Access or portability:** Request a copy of their Personal Data and the data they provided, in a readable format, either in print or electronically.

The User may make the requests listed above by contacting our Data Protection Officer (DPO) via email at dpo@geekhunter.com.br, and such requests will be reviewed in accordance with applicable laws.

12. REVISIONS TO THIS POLICY

If **GeekHunter** modifies this Privacy Policy, such changes will be visibly published on the GeekHunter website. This Policy is effective as of September 26, 2026. If the User has any questions regarding the website's privacy policy, please contact GeekHunter through the Data Protection Officer's communication channel.

13. CONTACT

The User may contact the DPO via email at dpo@geekhunter.com.br.

14. PREVIOUS VERSIONS

Previous versions of the Privacy Policy are available at the links below.

i. 01/17/2023 (portuguese)
ii. 10/23/2025
iii. 05/09/2026
iv. 07/09/2026