TALENTAXIS PRIVACY POLICY

Effective as of October 29, 2026

TalentAxis is a product of AgentAxis Corp, a Delaware corporation ("AgentAxis", "TalentAxis", "we", "us"). This Privacy Policy explains how we collect, use, disclose, and protect personal information of the users of TalentAxis (candidates and employers) and of visitors to talentaxis.ai and app.talentaxis.ai, including when candidates apply for jobs by WhatsApp or text message ("Text to Apply"). We handle personal information in accordance with applicable data protection and privacy laws, including the privacy laws of the U.S. states that apply to us.

This Privacy Policy applies to users outside Vietnam. Users in Vietnam are served by CVTOT JSC under a separate privacy policy.

1. Who We Are and Our Role

- **Employer accounts, website visitors, and our own communications.** AgentAxis decides how and why this information is processed and is responsible for it (it is the "controller", or the "business" under California law).
- **Candidate information collected for an employer.** When a candidate applies for a job with an employer that uses TalentAxis, including through Text to Apply, a careers page, or a job board, that employer decides how the candidate's information is used in its hiring and is responsible for it. AgentAxis processes this information on the employer's behalf and under the employer's instructions, as its "processor" or "service provider". Candidates who want to exercise a privacy right over an application should contact the employer. If they contact us, we will forward the request to the employer and help the employer respond.
- **Text messaging program.** AgentAxis operates the TalentAxis text messaging number and keeps the opt-in and opt-out records for it itself (see Section 3).

2. Information We Collect and Why

When you register for or use any TalentAxis Service, we may collect personal information necessary to identify you and to provide the Services.

For Employers:

- Collection of Company Name; Contact Person; Email; Phone Number; Tax ID (if provided); Business Sector; Company Introduction; business registration documents (if provided); Company Website (if any); Country; State/Province; Head Office Address; and the addresses of the company's hiring locations, when a Business registers an account to post job listings and verify the business account.
- If you sign in with Google, Microsoft, or LinkedIn, we receive your name, email address, and profile picture from that provider.

- Billing information: billing name, billing address, tax details, plan, and invoice history. Payments are made through our payment processor, Stripe, on Stripe's own checkout and billing pages. TalentAxis does not receive or store full card numbers.
- Collection of email, phone number, and name when the Employer contacts the website administration department to resolve any issues they encounter or other requests.

For Candidates:

- Collection of Email; TalentAxis access history; devices logged into TalentAxis; TalentAxis access times when performing Account Registration/Login.
- Collection of Email when the Candidate signs up to receive notifications.
- Collection of Full Name; Email; Date of Birth; Gender; Phone Number; City; Country when setting up an account.
- Collection of Full Name; Phone Number; Address; Education; Experience; Interests; Skills; Courses; Degrees/Certificates; Publications; Complete CV when creating a new job application or editing a previously created CV.
- **Text to Apply (WhatsApp and SMS):** mobile number, WhatsApp profile name, the messages exchanged, answers to screening questions, files sent (such as a CV), preferred language, and opt-in and opt-out records.
- **Assessment and scheduling:** the match score and summary generated from the application (see Section 4), interview dates and times, and the employer's notes and status changes on the application.
- **Interview recordings (off by default):** interview recording is not part of the standard Services. TalentAxis enables it for a company only at that employer's request. When it is enabled, the employer must tell candidates and obtain their consent before an interview is recorded. We then process the audio of the online interview, its transcript, and the evaluation generated from the transcript.
- Collection of email, phone number, and full name when the Candidate contacts the website administration department to resolve any issues they encounter or other requests.

For all visitors and users: IP address, approximate location (country) derived from the IP address, browser and device information, pages viewed, referring page and campaign parameters (such as UTM tags), and information collected by cookies and similar technologies (see Section 6).

TalentAxis collects and uses information for the following purposes:

- **Service provision:** Performing the service functions you have registered for, including account management, job posting, job listing management, business account verification, Text to Apply conversations, interview scheduling, billing, and related features.
- **Enhancing user experience:** Analyzing user behavior to improve features, support more effective recruitment management, or customize content according to your service usage needs.

- **Connecting with employers:** Supporting employers in reaching, managing, and communicating with suitable candidates according to recruitment needs and the scope of TalentAxis services.
- **Identity and business information verification:** Verifying Employer accounts, verifying business information and related information to ensure the platform's transparency, safety, and reliability.
- **Communications and advertising:** Sending notifications related to the service, account updates, job postings, promotional programs, events, news, or other content related to TalentAxis services. Text messages are sent only as described in Section 3.

In addition, we may use your personal information to:

- Detect and prevent fraud, abuse, security incidents, and legal violations.
- Fulfill legal obligations.
- Improve and develop new services.

3. Text Messaging (SMS) and WhatsApp

Text messaging (SMS)

If you text JOBS (or START) to (904) 439-7979, as shown on talentaxis.ai/text-to-apply-sms, AgentAxis Corp (TalentAxis) uses your mobile number only to send you text messages about the job application you started: screening questions, answers to your questions about the job, interview scheduling and reminders, and application status updates.

No mobile information will be shared with third parties or affiliates for marketing or promotional purposes. Text messaging opt-in data and consent are not shared with any third parties.

Message frequency varies. Message and data rates may apply. Reply STOP to opt out at any time, or HELP for help. Full terms: SMS Terms at talentaxis.ai/sms-terms.

Nothing else in this Privacy Policy permits any use or disclosure of mobile numbers or text messaging opt-in data that this section does not allow.

WhatsApp

When you message an employer's job number on WhatsApp, we use your WhatsApp number, profile name, and messages to run the application you started and to send you messages about it. WhatsApp messages are carried by WhatsApp (Meta Platforms) through the WhatsApp Business Platform. Reply STOP at any time to stop receiving messages; you can text the number again later to restart.

4. Scope of Use of Information

The TalentAxis platform uses the information provided by Candidates/Job Seekers and Employers/Businesses for the following activities:

- Identifying users when they post job information, search for jobs, or apply for positions.
- Assessing the suitability of Candidates for job positions as well as the reliability of Employers/Businesses.

- Analyzing the content of Candidates' personal profiles and CVs to suggest suitable jobs for Candidates.
- Analyzing recruitment content, business information, and hiring needs to introduce potential Candidates to Employers/Businesses.
- Supporting Employers/Businesses in managing candidate profiles, tracking the recruitment process, classifying candidates, changing candidate status, scheduling interviews, and handling other recruitment-related activities.
- Performing services requested by users registered with TalentAxis.
- Managing and operating the services provided on the platform.
- Proactively contacting Candidates/Job Seekers and Employers/Businesses when issues arise related to the use of the service.
- Optimizing job opportunities for Candidates and providing services suited to the specific recruitment needs of Employers/Businesses.
- Verifying business information, contact persons, business registration documents, tax IDs, or other information related to Employer/Business accounts.
- Handling requests arising during the use of the service, including complaints or reports of violations.
- Receiving, investigating, and resolving issues reported by users related to the service usage process.
- Monitoring and improving the quality of services provided on the platform.
- Researching and analyzing user behavior to improve services and develop new products.
- Detecting and analyzing fraudulent, fake, deceptive, or legally non-compliant behavior.
- Protecting user accounts against intrusion or unauthorized access.

Artificial intelligence. TalentAxis uses AI models provided by OpenAI (OpenAI's API) and by Anthropic (Anthropic's Claude API) to read CVs and extract their content, to compare an application with the job and produce a match score and summary, to hold the Text to Apply conversation (asking screening questions and answering questions about the job), and, where interview recording has been enabled at the employer's request, to evaluate the interview transcript. For each task we may use either provider, and one may stand in for the other if it is unavailable. These outputs help the employer review applications; the employer, not TalentAxis, decides whom to interview or hire. OpenAI does not use our data to train its models: all data sharing with OpenAI (feedback, evaluations and fine-tuning, inputs and outputs) is disabled for our account. Anthropic does not use data sent through its API to train its models. We do not use candidate information to train AI models of our own.

TalentAxis only uses personal information for the purpose of identifying, supporting, and providing services related to recruitment activities, job searching, job applications, candidate profile management, and recruitment management on the platform.

In cases where there is a request from a competent government authority such as a law enforcement agency, prosecutor, court, or other competent authority, TalentAxis has an obligation to cooperate in providing member information in accordance with the law. Apart from these cases, all personal information of users is kept confidential and is only shared with the consent of the data subject, as described in this Privacy Policy, or as required by law.

5. Service Providers

We use the following service providers to run TalentAxis. They process personal information on our behalf, under contract, only to provide their service to us:

- **Amazon Web Services (AWS):** hosting, databases, file storage, email delivery (Amazon SES), and transcription of interview recordings (Amazon Transcribe). Our primary data is stored in the AWS US East (N. Virginia) region; files you upload, such as resumes, are stored in the AWS Asia Pacific (Singapore) region.
- **Vercel:** hosting of the talentaxis.ai website and the app.talentaxis.ai web application.
- **Strapi Cloud:** hosting of website content (such as blog posts and legal pages). It does not hold candidate data.
- **Stripe:** payment processing, subscriptions, invoices, and sales tax calculation.
- **OpenAI:** AI processing of CVs, applications, Text to Apply conversations, and interview transcripts (see Section 4).
- **Anthropic (Claude API):** AI processing of CVs, applications, Text to Apply conversations, and interview transcripts (see Section 4).
- **Meta Platforms (WhatsApp Business Platform):** delivery of WhatsApp messages.
- **Twilio:** the provider of the TalentAxis text messaging number, (904) 439-7979, and delivery of text messages (SMS).
- **Google, Microsoft, and LinkedIn:** sign-in, when you choose to sign in with one of them. **Google Calendar and Calendly:** interview scheduling, when an employer connects its calendar.
- **Sentry:** error monitoring for the web application, including recordings of a sample of sessions in which on-screen text and media are masked.
- **Contentsquare:** analytics of how employers use the web application (heatmaps and session replay), with text that users type masked. It loads only after you consent to analytics cookies, and never on candidate-facing pages.
- **Google (Tag Manager and Analytics):** website analytics on talentaxis.ai.

The Meta Pixel described in Section 6 is used only with your consent, and never on candidate-facing pages.

6. Cookies and Similar Technologies

talentaxis.ai and app.talentaxis.ai use cookies and similar technologies to keep you signed in, remember your language and region, and measure how the sites are used. These include:

- **Strictly necessary:** sign-in, security, language, and region cookies.
- **Analytics and performance:** Google Tag Manager and Google Analytics (talentaxis.ai), Contentsquare (employer pages of app.talentaxis.ai, after consent), and Sentry (app.talentaxis.ai).
- **Advertising measurement (consent-based):** the Meta Pixel, only on our own marketing pages (talentaxis.ai) and the employer pages of app.talentaxis.ai, and only after you accept advertising cookies. It is never loaded on candidate-facing pages, such as job application, screening, and Text to Apply pages. It tells Meta Platforms which of those pages a browser visited, so that we can measure our advertising. If your browser sends a Global Privacy Control signal, we treat it as a refusal and do not load the Meta Pixel.

A cookie banner lets you accept or decline analytics and advertising cookies, and you can change your choice at any time. You can also block or delete cookies in your browser settings, and control ads from Meta in your Meta account's ad settings. More detail is in our Cookie Policy at talentaxis.ai/cookie-policy.

7. Information Storage Period

- Your personal information will be stored throughout the period you use TalentAxis's services and for the period necessary for any legal, operational, or legitimate business purpose after you stop using the service. After an account is deactivated or terminated, TalentAxis will retain the information for a reasonable period for backup, storage, inspection, dispute resolution, fulfillment of legal obligations, or system administration purposes in accordance with the law.
- Candidate information collected for an employer is kept for as long as the employer's account exists, unless the employer deletes it sooner or asks us to. Employers can archive candidates in the product. To delete an individual candidate's record, the employer or the candidate contacts support@talentaxis.ai, and our support team deletes it within 45 days of a verified request.
- When a company is closed (Section 12), its account, users, hiring locations, hiring flows, candidate profiles, and applications are deleted, and all remaining company data, including files such as CVs, logs, and backups, is deleted within 90 days after the closure takes effect.
- Payment and invoice records are kept by Stripe and by us for as long as tax and accounting law requires.
- Text messaging and WhatsApp opt-out records are kept so that we continue to honor the opt-out.
- In addition, if an account is inactive for 180 consecutive days, we have the right to delete your account and related data.

8. Persons or Organizations That May Have Access to That Information

We will not use, transfer, provide, or disclose any member's personal information to any third party without the member's consent, except in the following cases:

- **Employers and authorized users within the same business:** A candidate's application is shared with the employer the candidate applied to. When an Employer/Business assigns permissions to personnel, recruitment managers, or related users within the organization to jointly manage the account, job postings, candidate profiles, interview schedules, or recruitment process on the TalentAxis platform, those users can access that information.
- **Service providers:** The companies listed in Section 5, which provide services to us such as hosting, payment processing, message delivery, AI processing, error monitoring, and analytics.
- **Advertising measurement:** Meta Platforms, through the Meta Pixel described in Section 6, only with your consent and never on candidate-facing pages.
- **Competent government authorities:** Upon request from a law enforcement agency, prosecutor, court, or other competent government authority, or when necessary to comply with applicable laws or to protect the rights, property, or safety of TalentAxis, our users, or others.
- **Related parties in the event of mergers, transfers, or restructuring:** In the event that TalentAxis merges, is acquired, transferred, restructured, dissolved, or undergoes a similar transaction, user information may be transferred to the receiving party to continue providing the service, provided that the receiving party complies with information security obligations as required by law.

In all cases, TalentAxis will require relevant third parties to strictly comply with regulations on confidentiality and personal data protection, and to use information only for the agreed purpose or as required by law. Mobile numbers and text messaging opt-in data are handled only as described in Section 3.

Members have the right to file a complaint about the disclosure of personal information to a third party with TalentAxis at support@talentaxis.ai. Upon receiving such feedback, TalentAxis will confirm the information, is responsible for responding with the reason, and will guide members in restoring, updating, and re-securing their information.

9. Security

We are committed to protecting your personal information with appropriate technical and administrative measures to prevent unauthorized loss, misuse, access, disclosure, alteration, or destruction of information. These include:

- Encryption in transit: the websites, the application, and the connections to our service providers use HTTPS/TLS.
- Encryption at rest of our primary relational database.
- Candidate files such as CVs are kept in non-public storage and are opened only through links that expire after one hour.
- Access to candidate information within an employer's account is limited by the roles and permissions the employer assigns.
- Card payments are handled entirely by Stripe.

However, no security method is absolutely safe. In the event of a security incident affecting personal information, we will notify affected users, the employers concerned, and the competent authorities without unreasonable delay and as required by applicable law, and coordinate to implement necessary remedial measures.

10. International Transfers

AgentAxis is a U.S. company, and TalentAxis is used in the United States and other countries. Our primary data is stored in the United States (AWS US East region). Files you upload, such as resumes, are stored in Singapore (AWS Asia Pacific region), and our service providers process information in the United States, the European Union, and other countries. Some information about U.S. users is therefore stored and processed outside the United States. Wherever your information is processed, we protect it as described in this Privacy Policy.

11. Address of the Unit Collecting and Managing Information, and How to Contact Us

AGENTAXIS CORP, a Delaware corporation

- Address: 701 Tillery Street, Unit 12-3574, Austin, TX 78702, USA
- Email: support@talentaxis.ai
- Privacy contact: Henry Nguyen, authorized representative of AgentAxis Corp, support@talentaxis.ai

12. Methods and Tools for Users to Access, Edit, and Delete Their Personal Data

Members can self-check, update, adjust, or cancel their personal information in the following ways:

- Members log into their own account, go to the personal information section, and edit their personal information;
- Members email support@talentaxis.ai and request that their personal information be edited.

When necessary, TalentAxis requires re-confirmation of the password upon login to prevent unauthorized access to the Customer's personal information system.

Right to Request Account Closure and Deletion

TalentAxis provides multiple methods for users and businesses to proactively manage, close, or delete their accounts when they no longer wish to use the service. To ensure data security and integrity, all requests to delete an account or close a company are subject to a waiting period before permanent deletion occurs.

1. User Self-Closing an Account

Users can proactively request to close their TalentAxis account by performing the following steps:

1. Step 1: Log in to your TalentAxis account.
2. Step 2: Click on the avatar in the top right corner and select My Account.

3. Step 3: In the left-hand menu, select Close Account.
4. Step 4: In the Close Your Account window, click Confirm Closure to confirm.
5. Step 5: After successful confirmation, the system will display a confirmation notice that the account has been scheduled for closure, along with the exact date and time the account will be permanently deleted.

Note:

- If you are a Company Owner, you will not be able to close your own account while still holding the role of company owner.
- Before closing the account, you must transfer the Owner role to another member of the company.
- After no longer holding the Owner role, you can perform the account closure steps as instructed above.

Account Deletion Waiting Period

- The account will be scheduled for permanent deletion 24 hours after the closure confirmation.
- During this period, you can still log in and cancel the closure request by clicking Cancel Closure on the notification banner.
- If not canceled within 24 hours, the account will be permanently deleted and cannot be recovered.
- The system will send a notification email to relevant parties, including the Owner, Admin, and Member.

2. Owner, Admin, or HR Closing a Member's Account

In cases where it is necessary to terminate a member's access within the organization, the Company Owner, Company Admin, or HR Manager can close the account on behalf of the user.

1. Step 1: Log in to TalentAxis with an account that has the appropriate administrative rights.
2. Step 2: Go to Company → Team Management.
3. Step 3: Select the member account to be closed from the list and click Remove Member.
4. Step 4: In the Close Member's Account window, click Confirm Closure to confirm.
5. Step 5: The system will display a banner confirming the account has been scheduled for closure, along with the exact deletion date and time.

Note:

- Immediately after the administrator confirms the account closure, the member will be logged out of the system and will not be able to log in again.
- The account will be scheduled for permanent deletion after 24 hours.
- During this waiting period, the administrator can still cancel the closure request via the notification banner.

- After the waiting period ends, the account will be permanently deleted and cannot be recovered.
- A notification email will be sent to the Owner, Admin, and the closed member.

3. Owner Closing the Entire Company (Workspace)

Only the Company Owner has the authority to close a company on TalentAxis. Closing a company means that the data belonging to the workspace will be deleted, including but not limited to:

- The Company Owner's account.
- The accounts of all employees and members of the company.
- Candidate profiles and application data.
- Files, documents, and related data.
- System activity history.

Steps to Follow

1. Step 1: Log in with the Company Owner account.
2. Step 2: Go to Company → Company Information.
3. Step 3: On the General page, click Close Company.
4. Step 4: In the Close Company window, click Close Company to proceed.
5. Step 5: The system will send a confirmation email. Open the email and click the Close Company link.
6. Step 6: Select a reason for closing the company and enter your password to confirm the request.
7. Step 7: Once completed, the system will display a banner confirming the company has been scheduled for closure, along with the exact closure date and time.

Company Closure Waiting Period

- After confirmation, the company will continue to operate normally for 30 days.
- During this period, all users belonging to the company can still log in and use the system as normal.
- The Company Owner can cancel the closure request by going to Company → Company Information → General and selecting Cancel Closure.
- After the 30-day waiting period ends, the company and its data will be deleted as described in Section 7 and cannot be recovered.
- A notification email will be sent to the Company Owner and Company Admins.

Effect of Data Deletion

After the waiting period ends and the deletion process is carried out, the data will be deleted from the TalentAxis system as described in Section 7. Recovery of any deleted account, company, or data will

no longer be possible. Closing an account or a company does not cancel or refund a paid subscription; see the TalentAxis Refund Policy.

13. Your U.S. State Privacy Rights

This section applies to residents of California and of other U.S. states whose privacy laws give similar rights, to the extent those laws apply to AgentAxis. For candidate information that we process for an employer (Section 1), please make your request to that employer.

Information we collect. In the past 12 months we have collected the following categories of personal information, from you, from the employer you applied to, from your device, and from the sign-in and calendar providers you connect: identifiers (name, email, phone number, IP address, account and cookie IDs); customer records (billing name and address, tax details); professional or employment-related information (CV, work history, screening answers, interview records); education information (as stated in a CV); commercial information (plans purchased and invoices); internet or other electronic network activity (pages viewed, use of the Services); approximate geolocation (country derived from the IP address); audio information (interview recordings, only where recording has been enabled at the employer's request); and inferences (AI match scores and summaries). We use them for the purposes in Sections 2 and 4, disclose them to the service providers in Section 5, and keep them for the periods in Section 7. We do not use sensitive personal information to infer characteristics about you.

Sale and sharing. We do not sell or share personal information, including for cross-context behavioral advertising. The Meta Pixel (Section 6) loads only on our own marketing and employer pages after you consent, never on candidate-facing pages, and not at all when your browser sends a Global Privacy Control signal. We do not knowingly sell or share the personal information of consumers under 16 years of age. Mobile numbers and text messaging opt-in data are never sold or shared (Section 3).

Your rights. Subject to the law that applies to you, you have the right to:

- know what personal information we have collected about you, its sources, the purposes, and to whom we disclosed it, and to get a copy of it;
- request that we delete personal information we collected from you;
- request that we correct inaccurate personal information;
- opt out of the sale or sharing of your personal information (we do not sell or share it, and we honor Global Privacy Control signals); and
- not receive discriminatory treatment for exercising any of these rights. We will not deny you the Services, charge you a different price, or provide a different quality of service because you exercised them.

How to make a request. Email support@talentaxis.ai with the subject "Privacy request", the right you want to exercise, and the email address or phone number you used with TalentAxis. We will confirm receipt within 10 business days and respond within 45 calendar days. If we need more time, up to another 45 days, we will tell you why. We verify your identity by matching the information you

give us with the information we hold, for example by asking you to confirm a code we send to that email address or phone number. You may use an authorized agent; we will ask the agent for your signed permission and may ask you to verify your identity directly. If we deny your request, you may appeal by replying to our decision, and we will respond to the appeal within 60 days.

14. Children

TalentAxis is not directed to children under 16, and we do not knowingly collect personal information from children under 16. If you believe a child under 16 has given us personal information, contact support@talentaxis.ai and we will delete it.

15. Mechanism for Receiving and Resolving Complaints About the Use of Personal Information

- We are committed to keeping users' personal information confidential and using it only for the notified purpose. In the event that personal information is found to have been used for an improper purpose or beyond the notified scope within the company, the company will be held responsible in accordance with the law.
- In the event of a security incident affecting personal information, we will notify you as described in Section 9.
- Upon discovering that their personal information has been used for an improper purpose or beyond the notified scope, users should file a complaint through one of the following methods:
  - Email: support@talentaxis.ai
  - Send directly or by post to: AgentAxis Corp, 701 Tillery Street, Unit 12-3574, Austin, TX 78702, USA

TalentAxis commits to acknowledging receipt immediately or no later than 24 working hours from the time the complaint is received. The processing and response time is 7 working days. Requests to exercise the rights in Section 13 follow the timelines in that section.

Process for Receiving Complaints About Personal Information Being Used for an Improper Purpose or Beyond the Notified Scope

1. Step 1: All requests and complaints are received by the TalentAxis support team. The complaint content must clearly state: the complainant's information, the subject of the complaint, the details of the matter, and supporting evidence (if any).
2. Step 2: The support and technical staff will verify and check the data and the content of the complaint.
3. Step 3: If the complaint is valid, the company will proceed to prevent and remedy the incident (deleting data, locking related accounts, stopping the violation) and respond to the complainant.
4. Step 4: The resolution result will be communicated to the user by email/phone/written notice. If the complainant agrees with the content and the proposed resolution, the complaint-handling process ends. If the complainant does not agree with the proposed resolution and requests it be

reconsidered, the request for reconsideration will be accepted, and the process repeats Steps 2, 3, and 4. If the complainant still does not agree with the resolution, the complainant has the right to file a complaint with a competent government authority, such as the state attorney general or the California Privacy Protection Agency, or to bring a claim in accordance with the TalentAxis Terms of Use.

5. Step 5: If necessary, the company will coordinate with the competent government authority to thoroughly resolve the matter.

16. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. We will post the updated version on talentaxis.ai with a new effective date and, if the changes are material, notify account holders by email or in the product before they take effect.

Last updated: November 6, 2026