

# Privacy Policy

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Company: How to Job Group Limited

Incorporated in Hong Kong

Contact Email: info@howtojob.io

Business Registration No: 79344756

Business Registration Address: Unit 1113, 11/F Peninsula Centre 67 Mody Road Tsim Sha Tsui Hong Kong

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## Acknowledgement

We respect your privacy and are committed to protecting your personal data. This Policy explains how we collect, use, store, disclose, transfer, and safeguard your information when you use our websites, coaching services, AI tools, digital content, or any related service (collectively, the “Services”).

By using the Services, you agree to this Policy.

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## **I. WHO WE ARE**

How to Job Group Limited

Unit 1113, 11/F Peninsula Centre 67 Mody Road Tsim Sha Tsui Hong Kong

Email: [info@howtojob.io](mailto:info@howtojob.io)

1.1. We act as the data controller under:

- Hong Kong PDPO
- EU GDPR
- UK GDPR

- US privacy laws (CCPA/CPRA & state equivalents)

## **2. DATA WE COLLECT**

### 2.1 Personal Identification Data

- Name
- Email
- Phone
- Contact details

### 2.2 Account Data

- Login details
- Access logs
- Session history

### 2.3 CV & Employment Data

- Resumes
- Work history
- Education
- Skills
- Industry preferences

### 2.4 Voice & Video Data

- Voice recordings
- Video recordings
- Interview simulations
- Elevator pitch recordings
- Tone, cadence, pacing, communication patterns
- Transcripts and analysis

### 2.5 AI Interaction Data

- Prompts
- AI input
- AI output
- Feedback

- Scorecards

## 2.6 Technical Data

- IP address
- Cookies
- Browser/device info
- Session behaviour

## 2.7 Payment Data

Processed securely by Stripe or similar providers.

## 2.8 Support Data

- Emails
- Messages
- Coaching notes
- Internal correspondence

# **3. HOW WE USE YOUR DATA**

We use your data to:

## 3.1 Deliver the Services

- Provide coaching
- Generate AI analysis
- Create personalised materials
- Build workflows and job search plans

## 3.2 Improve Our AI Tools

Using anonymised and aggregated data only.

We do not train external models with your data.

## 3.3 Provide Support

- Resolve issues
- Assist with onboarding
- Manage your account

### 3.4 Maintain Security

- Prevent fraud
- Detect misuse
- Ensure safe operation

### 3.5 Comply With Laws

- PDPO
- GDPR
- UK GDPR
- US privacy laws
- Payment processor requirements

## 4. LEGAL BASIS FOR PROCESSING

4.1. Under GDPR/UK GDPR, we process data based on:

- Contractual necessity
- Legitimate interests
- Consent (recordings, cookies, marketing)
- Legal obligation

## 5. RECORDING & VOICE/VIDEO PROCESSING CONSENT

5.1. You explicitly consent to:

1. Audio/video recording when required for the
2. Analysis of your tone, cadence, pacing, communication patterns
3. Storage of recordings, transcripts, and derived analyses
4. Use of anonymised extracts for internal improvement
5. Retention for as long as reasonably required

5.2. Deletion requests are honoured where legally and technically possible.

## 6. COOKIES

We use essential, analytics, and performance cookies.

EU/UK users receive a **cookie consent banner**.

## **7. INTERNATIONAL TRANSFERS**

7.1. Your data may be transferred to:

- EU
- US
- Hong Kong
- Global CDNs (Cloudflare/ AWS/GCP)

7.2. Safeguards include:

- Standard Contractual Clauses (SCCs)
- Data processing agreements
- Adequacy-based transfers
- Commercial safeguards

## **8. DATA STORAGE & SECURITY**

8.1. We use industry-standard measures including:

- Encryption
- Password hashing
- Access controls
- Monitoring
- Secure backups
- Confidentiality agreements

8.2. No system is perfectly secure, but we take all reasonable steps.

## **9. DATA RETENTION**

9.1. We keep information only as long as needed to:

- Provide the Services
- Comply with legal obligations
- Resolve disputes
- Maintain business records

9.2. Users may request deletion.

## **10. SHARING YOUR DATA**

We share data only with:

### 10.1 Third-Party Providers

Stripe, Typeform, Restream, cloud hosts, email services, analytics tools, AI processors.

### 10.2 Legal Authorities

Where required by law.

### 10.3 Authorized Contractors

Under strict confidentiality.

We do NOT sell your personal data.

## **11. YOUR RIGHTS**

Depending on your location:

### **EU/UK GDPR**

You may request:

- Access
- Correction
- Deletion
- Restriction
- Data portability
- Objection to processing
- Withdrawal of consent

### **US (CCPA/CPRA & Others)**

- Know
- Delete
- Correct
- Opt-out of sharing
- Non-discrimination rights

### **Hong Kong PDPO**

- Access
- Correction

Requests may be made at any time by email.

## **12. AUTOMATED DECISION-MAKING / PROFILING**

AI tools provide **assistive suggestions only**.

They do not determine employment or make automated decisions with legal effects.

## **13. CHILDREN**

We do not knowingly collect data from users under 18.

If discovered, such data will be deleted.

## **14. THIRD-PARTY LINKS**

We are not responsible for external sites linked from our Platform.

## **15. DATA BREACH NOTIFICATION**

15.1. In the event of a data breach affecting your personal data, we will:

- Notify you without undue delay where legally required
- Inform relevant supervisory authorities (EU/UK/HK/US)
- Provide details of:
  - The nature of the breach
  - Data affected
  - Mitigation steps taken
  - Recommended actions for you

15.2. This clause ensures full compliance with GDPR, UK GDPR, PDPO, and US laws.

## **16. DATA PROTECTION CONTACT**

For privacy-related requests, you may contact our designated Data Protection Contact:

**Privacy Contact:**

info@howtojob.io

This is the single point of contact for exercising rights, requesting deletion, or making privacy enquiries.

## **17. CHANGES TO THIS POLICY**

We may update this Policy.

Changes will be posted with a new “Last updated” date.

Continued use means acceptance of the updated Policy.

## **18. CONTACT**

How to Job Group Limited

Unit 1113, 11/F Peninsula Centre 67 Mody Road Tsim Sha Tsui Hong Kong

Email: [info@howtojob.io](mailto:info@howtojob.io)