

Supplementary Privacy Policy (BrightHire Inc.)



1. Introduction

This Supplementary Privacy Policy (“**Policy**”) explains how the Flo Health group of companies (collectively, “**Flo**”, “**we**” or “**us**”) engages BrightHire Inc. (“**BrightHire**”) as a data processor, to collect and process personal data during the hiring process.

This Policy should be read in conjunction with [Flo’s Job Applicant Privacy Policy](#) (the “**Main Policy**”).

2. What is BrightHire?

BrightHire is an AI-powered tool that enhances our hiring process by assisting our Talent Acquisition team with data-driven decisions, improving efficiency and promoting a fair recruitment experience. It transcribes interviews and generates objective summaries, reducing the administrative burden of manual note-taking while ensuring accuracy and consistency in candidate evaluations.

For further information regarding BrightHire, please visit their website: brighthouse.com

3. What happens if you opt-out of the BrightHire tool?

You can opt-out of the use of the BrightHire tool at any point during the hiring process without affecting your application or final hiring decision. Your interviews will proceed as scheduled, but we will ensure that the tool is not used.

To opt-out, please follow the link in your interview invite or contact us at: hr@flo.health

4. Information collected

BrightHire transcribes your interview which means it will capture any information discussed in these conversations. However, before relevant details are added to your candidate profile, the interviewer will manually review and approve the transcript to ensure its accuracy.

For the list of specific datasets that may be collected during the interview process, please refer to the Main Policy.

5. How Flo will use information collected

Flo uses the BrightHire tool for the following purposes:

- **Transcript:** The BrightHire tool provides real-time interview transcriptions to assist with note-taking. These transcripts **do not** determine hiring decisions, but instead streamlines the administrative task of note-taking.
- **AI Summary:** The AI-powered summary function helps interviewers extract key insights from the interview, ensuring factual and objective evaluations of candidates. This enhances the:
 - accuracy and fairness of candidate assessments; and
 - overall recruitment process by improving the quality and relevance of interview questions.

- **Insights:** Your personal data will be aggregated and anonymised (so it does not identify you personally) to help us analyse hiring trends, improve interviewer performance and ensure fairness by reducing bias in our hiring process.

6. How we process your personal data

In the context of BrightHire, we process your personal data for the following purposes:

- In our **legitimate interest:** To streamline and improve our hiring process;
- For the purposes of **employment:** For example, we need to understand your working location and ensure that you are entitled to work in the location you have applied for; and
- For the purpose of **occupational health:** For example, you may wish to disclose certain adjustments relevant to your requirements at work. To be clear, this is not to assess your suitability for the role, but to ensure - in the event of a successful application - that we implement the appropriate adjustments ahead of your start date.

For a comprehensive overview of how we process your personal data, please refer to the Main Policy.

7. Who will access your personal data

We may share information with our vendors as outlined in our Main Policy.

Your interview transcripts are primarily accessible only to those present during the interview. In limited cases, a small number of Flo employees may access transcripts when they were not present for the interview. The purpose of this includes to:

- address disputes or complaints related to the hiring process;
- help refine and improve our interview process; and
- assist senior hiring managers in cases where a final decision cannot be reached.

If a decision is influenced by an interview where the decision-maker was not present, they are required to consult with attendees to ensure appropriate context is understood before any final employment decision is made.

8. Automated Decision-Making

BrightHire is **not** used for automated decision-making. Specifically:

- **Transcript:** All transcript data is subject to human review before being imported into a candidate profile.
- **AI Summary:** The AI Summary is only capable of extracting objective information, and any information extracted is verified by a human. The system has been programmed to reject any question that is considered subjective. For example, an error message will occur if a question such as 'Should I hire this candidate?' is entered.
- **Insights:** The Insights data is limited only for the purpose of improving the hiring process and information relating to candidates is aggregated so that no individual candidate can be identified.

9. Data Retention

Regardless of the hiring outcome, all personal data will be permanently and automatically deleted from BrightHire once the process concludes. This is even if you have consented to Flo retaining your data for future opportunities.

10. Your Rights

You have the **'Right to Object'** to the use of BrightHire. This allows you to opt-out of BrightHire at any time without any impact on your application. For a complete list of your rights, refer to the Main Policy.

11. Contact or Complaints

If you have any questions relating to the use of BrightHire, please contact hr@flo.health. Or you can email Flo's data protection officer at dpo@flo.health.

For data protection concerns, contact our Data Protection Officer at dpo@flo.health. You may also raise complaints with your local data protection authority or regulatory body, as detailed in the Main Policy.