



Privacy Policy Introduction

Document change record

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Pyramid Consulting, Inc. and our operating affiliate divisions (GenSpark™ and Celsior™) are committed to protecting and respecting your privacy. Accordingly, we have developed this privacy notice for you to understand how we collect, use, communicate, disclose, and make use of personal data through digital platform - hoonr.ai.

- The terms “we,” “us,” and “our” refer to Pyramid Consulting, Inc., and its affiliates (the “Organization”).
- The term “Site” refers to www.pyramidci.com; www.genspark.net; www.celsiortech.com and the platform www.hoonr.ai.
- The terms “user,” “you,” and “your,” refer to site visitors, product users (business clients or end-users), candidates, and any other individuals who access or interact with our sites and services.
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Use of the platform, including all information presented herein and all online services provided by the organization, is subject to this privacy notice.

Who are we?

Pyramid Consulting, Inc. is an award-winning, global staffing organization, and one of the leading and most reliable sources of the best total talent and technology services in the industry. We are committed to satisfying the needs of all customers: our clients, consultants, and employees.

Through our four divisions including Hoonr.ai we provide:

- Innovative workforce and talent solutions
- Advanced automation and AI-driven customer support tools



- Subject matter expertise in IT and digital transformation

We are committed to helping our clients, consultants, and employees succeed while protecting the personal data of everyone who interacts with us online or through our products.

Who does this privacy notice protect?

This privacy notice applies to all:

- Hoonr.ai platform users (business clients and their customers)
- Candidates and other users of our websites and digital services

By

Overview of the Product

Hoonr.ai is an AI-powered customer support assistant that enables businesses to automate, centralize, and enhance support via chatbots, live agents, automation workflows, and multilingual responses

This Notice explains how Hoonr.ai collects, uses, and shares personal data of end-users and business clients when they interact with the product.

By using any of our platforms, including Hoonr.ai, or engaging with our services, you acknowledge that you have read and agree to this Privacy Notice.

Information We Gather:

Our primary goal in collecting information is to provide Services and improve them, to administer your use of the Services (including your Account, if you are an Account holder), and to enable you to enjoy and easily navigate our Services.

When do we collect information?

We collect personal data through various interactions with the Hoonr.ai website, platform, and services. Information may be collected in the following situations:



- When you visit our website - including browsing pages, reading product information, or interacting with chatbots.
- When you sign up or register - to access the platform as a business client, support agent, or administrator
- When you log in or manage your account - including updating user profiles, team settings, or communication preferences
- When you communicate with us directly - via contact forms, chatbot queries, demo requests, or customer support tickets
- When you use the Hoonr.ai chatbot widget - whether as a site admin or an end-user on a client's website
- When you upload documents or provide data - such as resumes, support templates, chat workflows, or knowledge base content
- When clients embed our chatbot - we may process user-submitted data (such as names, emails, or support requests) through the chatbot interface
- When you participate in surveys or feedback requests - including product feedback, usability research, or service satisfaction polls
- When cookies and similar technologies are triggered - for analytics, session tracking, performance monitoring, and personalization
- When required for security or compliance - such as detecting fraud, logging suspicious activity, or enforcing access restrictions

What information do we collect?

When you use or register with the Hoonr.ai platform, some of the data that we collect and receive from you is personal data, which means that it is information that could personally identify you ("Personal Data").

Depending on your role (e.g., business client representative, user support agent, or site visitor), the categories of personal data we may collect include:

Information You Provide Directly:

We collect personal data you choose to share with us when you:

- Register an account
- Fill out forms or contact us



- Use our chat interface (live or automated)
- Upload documents or configure your workspace

The details collected are as follows:

- Contact & Identification Info: Full name, email address, phone number, company name, job title
- Login Credentials: Username, password, role-based access tokens
- Professional Background (if voluntarily submitted): Resume, work history, qualifications
- Chat Content: Messages sent or received using our chatbot/live agent interface
- Uploaded Content: Files such as resumes, templates, macros, or conversation scripts
- Customer Support Information: Issue descriptions, escalation requests, or service history

Information We Collect Automatically:

We automatically collect certain data to help operate, secure, and improve our platform:

- Technical Data: IP address, device ID, browser type/version, operating system
- Usage Data: Time of access, pages viewed, actions taken in the platform
- Session Data: Login timestamps, session duration, clickstream
- Cookies & Tracking Data: Session cookies, preference cookies

Note on End-Users (Customer Visitors):

If you are a visitor interacting with a Hoonr.ai-powered chatbot on a customer's website, we may process any information you submit during the chat, such as your name, email, support request, or other data relevant to the customer's support process. In such cases, our customer acts as the Data Controller, and Hoonr.ai is the Data Processor.

Sensitive Information (Limited)

We generally do not request or process sensitive personal information (such as race, health data, biometrics, or government IDs). However, in rare cases, users may submit such information during chats or uploads. We treat all such information with heightened care, as required by law.

Lawful Basis for Processing (GDPR, CCPA & CPRA):



Hoonrai processes personal data under the lawful bases required by the EU/UK GDPR and in accordance with the rights and requirements of the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA).

Processing Activity	Purpose	Lawful Basis (EU/UK GDPR)	CCPA/CPRA Basis
User authentication & access	To register and manage access to user accounts	Art. 6(1)(b) – Contract	Business Purpose
Candidate profile management	To manage candidate applications and availability	Art. 6(1)(b) – Contract	Business Purpose
Resume & document storage	To store candidate resumes and related documents	Art. 6(1)(b) – Contract	Business Purpose
Email notifications	To send important platform notifications (e.g., registration, password reset, interview reminders)	Art. 6(1)(f) – Legitimate Interests	Business Purpose
Search indexing for job/candidate matching	To enable search and AI matching for job roles and candidates	Art. 6(1)(f) – Legitimate Interests	Business Purpose
Third-party job sync (e.g., JobDiva, Beeline)	To sync job postings and candidate data across platforms	Art. 6(1)(f) – Legitimate Interests	Business Purpose
Internal communication via MS Teams	Internal collaboration and support handling	Art. 6(1)(f) – Legitimate Interests	Business Purpose
Interview coordination	To schedule and manage interviews between candidates and clients	Art. 6(1)(b) – Contract	Business Purpose

Note for EU/UK Residents:

Where processing is based on legitimate interests, we have balanced our operational needs with your rights and expectations.



Any use of your information for analytics or support is done in accordance with our contractual obligations and legitimate interests.

How will we use your information?

We use the information provided by you in the following ways:

- Account creation and access: To register users, authenticate logins, and manage access rights.
- Candidate and profile management: To allow candidates to submit profiles, resumes, and other relevant data.
- AI chatbot and support functionality: To enable automated conversations, responses, and workflow actions.
- Job-candidate matching: To match job seekers to open roles using indexed and AI-driven search.
- Resume/document storage: To store, retrieve, and manage user-submitted files.
- Communication: To send confirmations, updates, reminders, and other platform-related notifications.
- Customer service and technical support: To respond to inquiries, investigate issues, and resolve support tickets.
- Platform improvement and analytics: To monitor platform usage, troubleshoot bugs, and improve features.
- Integration with third-party systems: To sync jobs, candidates, and activity from platforms like JobDiva or Beeline.
- Legal and compliance purposes: To comply with applicable laws, enforce terms, or respond to legal claims.

Note:

We do not use your data for any unlawful profiling, automated decision-making that produces legal effects. If this changes, we will update this notice and provide appropriate opt-out mechanisms.

Sensitive personal information (if ever submitted, e.g., in resumes or messages) is used only as necessary to deliver the service and is never sold or shared beyond authorized recipients.

Why do we process your personal data?



We use personal data and other data collected to register you, provide information regarding employment opportunities and career-related information, and to otherwise provide you with requested information or services.

You have the right to ask us not to process your personal data for marketing purposes and can opt out of receiving such email messages by sending an email with this request to privacy@hoonr.ai from each e-mail account that you would like to opt out from.

With whom do we share your personal data?

The organization may disclose personal data to third parties. The disclosure to third parties would occur in the following circumstances:

We may disclose your personal data with:

- Information Shared with our Clients:
 - We will disclose information to our clients when necessary and appropriate in connection with the provision of staffing and recruitment services.
- Information Shared with our Service Providers
 - We may engage third-party service providers to work with us to administer and provide the Services. These third-party services providers have access to your PII only for the purpose of performing services on our behalf. (e.g., AWS, Sendgrid, Algolia, Cognito, MS Teams, recruitersbot.ai).
 - We may disclose information to companies and individuals we employ to perform business functions and services on our behalf.
- Information shared with the Recruiting organizations (where you apply)
 - When you apply for a position or express interest in a job opportunity through the Hoonr.ai platform, we may share your personal information with the recruiting organization or client offering the role.
- Information Shared with Third Parties.



- We may share aggregated information and non-identifying information with third parties for industry research and analysis, demographic profiling, and other similar purposes.
- Information Disclosed in Connection with Business Transactions
 - Information that we collect from our users, including PII, is considered to be a business asset. As a result, if we go out of business or enter bankruptcy or if we are acquired as a result of a transaction such as a merger, acquisition, or asset sale, your PII may be disclosed or transferred to the third-party acquirer in connection with the transaction. Any such disclosure shall be in accordance with any and all legal requirements applicable.
- Information sharing with Legal and regulatory authorities (if required)
 - We may share the data with legal and regulatory authorities when subpoenaed or to comply with law.
 - We may disclose information to the extent necessary or appropriate to government agencies, advisors, and other third parties to comply with applicable laws, the service of legal process, or if we reasonably believe that such action is necessary to: (a) comply with the law requiring such disclosure; (b) protect the rights or property of the organization; (c) prevent a crime or protect national security; or (d) protect the personal safety of the users or the public.
- Information We Disclose with Your Consent or at Your Request
 - We will share your PII with third-party sites or platforms if you have expressly requested that we do so.

Important information for candidates joining our network

Hoonar AI and its affiliates and contracted partners engage with candidates via calls AI-generated calls, text messages, and/or emails to share job opportunities. Consistent with our privacy policy, information obtained will not be shared with third parties / affiliates for marketing / promotional purposes.



SMS: Frequency varies for text messages. Message and data rates may apply. Carriers are not liable for delayed or undelivered messages. You can reply STOP to cancel and HELP to receive further assistance.

The Security of Your Information

We implement technical and organizational measures including:

- AWS-based encrypted infrastructure (S3, EC2)
- Role-based access controls
- Multi-factor authentication (via Cognito)
- Monitoring and logging (CloudWatch)

We take reasonable measures to protect the information that we collect from or about you (including your PII) from unauthorized access, use, or disclosure by encrypting all data while stored and in transit via our Services, including User information, messages, and any Content attached to the messages.

Please be aware, however, that no method of transmitting information over the Internet or storing information is completely secure. Accordingly, we cannot guarantee the absolute security of any information.

What rights do you have?

We respect your right to review and request changes to your personal data. The amount of personal data you are required to provide when requesting our services is consistent with the organization's interest in providing our services to you. The organization complies with applicable data protection laws and regulations.

We process personal data about you for the purposes set out in this privacy notice, including, but not limited to providing recruitment, placement, employment, and outsourcing services; operating our business; complying with our legal and contractual obligations; and fulfilling other legitimate interests of the organization.

Data Subjects have certain rights in respect of their personal data. The rights given with respect to your personal data include:

Rights Under EU GDPR / UK GDPR



If you are located in the European Union or the United Kingdom, you have the following rights under the General Data Protection Regulation (GDPR) and UK GDPR:

Right	Description
Right of Access	You may request a copy of the personal data we hold about you.
Right to Rectification	You can ask us to correct inaccurate or incomplete personal data.
Right to Erasure (Right to be Forgotten)	You may request deletion of your data where it's no longer needed or if you withdraw consent.
Right to Restrict Processing	You can limit the way we use your data in certain circumstances (e.g., if data accuracy is contested).
Right to Data Portability	You can request your data in a structured, commonly used, and machine-readable format.
Right to Object	You can object to data processing based on our legitimate interests or for direct marketing.
Right to Withdraw Consent	If processing is based on your consent, you can withdraw it at any time.
Right to Lodge a Complaint	You may file a complaint with your local data protection authority.

Whenever you use our services, we aim to provide you with easy means to access, modify, delete, object to or restrict the use of your personal information

We strive to give you ways to access, update/modify your data quickly, or delete it unless we have to keep that information for legal purposes.

How to Exercise Your Rights

These rights can be exercised by contacting us using the details below.

To exercise any of these rights, please contact us at:

Email: privacy@hoonr.ai

You may be asked to verify your identity before we can process your request.



We respond to verifiable requests within the timelines required by applicable law (typically 30 days under GDPR).

Cookies

For the purposes of the Services, we use automated data collection tools such as Cookies to collect certain information. “Cookies” are small text files that are placed on your hard drive by a Web server when you access our Services. We use cookies and tracking technologies for functional and analytical purposes. These may include:

The categories of cookies used are:

Necessary cookies: These cookies are needed to run our website, keep it secure, and comply with regulations that apply to us.

Analytics cookies: we may use analytics cookies on our website. We may use both session Cookies and persistent Cookies to identify that you have logged in to the Services and to tell us how and when you interact with our Services. We may also use Cookies to monitor aggregate usage and web traffic routing on our Services and to customize and improve our Services. (e.g., AWS CloudWatch)

Session and authentication cookies: we use cookies and similar tracking technologies to ensure the secure and functional operation of our platform. In particular, we use session and authentication cookies to support user login, navigation, and personalized experiences.

You may give or withdraw consent for specific categories of cookies in the Cookie Banner or Privacy Settings section found at the bottom of the page.

Please note, however, that if you don’t accept Cookies, you may not be able to access all portions or features of the Services.

Our Policy Towards Children

Our Services are not directed to children under 16 and we do not knowingly collect data from users below the relevant age threshold.

If we learn that we have collected the Personal Data of a child below the relevant age threshold we will take steps to delete such information from our files as soon as possible.

Links to Other Sites



Our Services may contain links to other websites and services. Any information that you provide on or to a third-party website or service is provided directly to the owner of the website or service and is subject to that party's privacy policy.

The Hoonr.ai platform and website may contain links to third-party websites or services that are not operated or controlled by Pyramid Consulting, Inc. or its affiliates. These may include links to client career pages, job boards, learning platforms, video conferencing tools (e.g., Zoom, MS Teams), or external resources relevant to your job search or service interaction. Hoonr.ai disclaims responsibility for any data processing activities carried out by those external websites.

We provide these links for your convenience or as part of the service integration, but:

- We do not control, and are not responsible for, the content, security, or privacy practices of those external sites.
- Once you leave our platform or interact with a third-party system, your data will be governed by that site's own privacy notice or terms.
- We recommend that you review the privacy policies of any third-party site you visit before providing personal information.

International Transfer

Hoonr.ai operates globally, and in some cases, personal data may be transferred to or accessed from locations outside your country or region of residence. Where such transfers involve countries outside the European Economic Area (EEA) or the UK, we ensure that they are made in compliance with applicable data protection laws.

Transfers Within the EEA

Most of Hoonr.ai's data processing infrastructure such as AWS Cognito, Internal Postgres DB, AWS S3, Recruiters (via secure UI), SendGrid etc is hosted within the European Union, specifically Stockholm (EU).

Safeguards for International Transfers

To protect your personal data during international transfers, we implement appropriate safeguards, including:

- Standard Contractual Clauses (SCCs) approved by the European Commission and/or UK Information Commissioner's Office



- Data Processing Agreements (DPAs) with clear obligations on confidentiality, security, and privacy controls
- Technical and organizational measures, such as encryption, role-based access, and audit logging.

We do not allow international transfers of your personal data without valid legal mechanisms and appropriate protections in place.

Data Retention

We will retain your personal information for as long as is needed to fulfill the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law. We take reasonable steps to delete or permanently de-identify your Personal Data that is no longer needed.

We retain your personal data only as long as necessary:

- Candidates: up to 12 months from last activity (unless longer retention is justified by ongoing recruitment or consented storage)
- Recruiters: as long as the account remains active
- Logs and analytics data: retained for up to 24 months for service improvement and security

Data may be retained longer when required:

- To comply with legal obligations (e.g., financial, contractual, employment, or audit requirements)
- To protect our legal rights or in connection with actual or potential legal proceedings
- Where retention is necessary for security, fraud prevention, or business continuity



California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA).

This section supplements the Hoonr.ai Privacy Notice and applies solely to California residents, as defined under the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA).

Notice to California Individuals

California residents have a legal right to request organizations to tell them how their Personal Information has been shared, if at all, with third parties for the third parties' direct marketing purposes. To make such a request, please reach us at the contact information listed below. This request may be made no more than once per calendar year, and we reserve our right not to respond to requests submitted other than to the email or mailing addresses specified below.

Personal Information Collected – Categories & Sources

Under California law, we are required to disclose the categories of personal information collected in the preceding 12 months and their sources:

Category	Examples	Source
Identifiers	Name, email, IP address	Directly from user
Internet or Network Activity	Log files, device info, cookies	Automatically collected
Professional/Employment Data	Job history, skills, resume data	Directly from user or third-party sync (e.g., JobDiva)
Inference Data	Profile scoring for job matching	Created internally
Sensitive Personal Information (SPI)	Login credentials, profile access tokens	Directly from user

Do Not Track

Certain web browsers and other devices you may use to access the Sites may permit you to submit your preference that you do not wish to be “tracked” online. We do not currently commit to responding to “do not track” requests, in part, because no common industry standard for “do not track” has been adopted by industry groups, technology companies, or regulators. We will make



efforts to monitor developments around Do Not Track browser technology and the implementation of a standard.

Do Not Sell or Share My Personal Information

Under California law, you have the right to request a “Do Not Sell or Share My Personal Information” signal. Since we do not sell or share personal data for monetary gain, no opt-out is needed but you still can request to limit processing of sensitive personal data.

Contact us at privacy@hoonr.ai to make any request. we do not sell or share your personal information for cross-context behavioral advertising. All data is processed strictly for business purposes.

Use of sensitive personal information

We do not collect any Sensitive Personal Information from the Customers.

Sharing of personal data

We do not sell your personal data. Under CCPA/CPRA, we confirm that we have not sold personal data in the past 12 months.

Retention, Use, Disclosure of Personal Data

We will not retain, use, or disclose Customer Personal Information according to the Agreement outside of the direct business relationship with Customer or for any purpose, including a Commercial Purpose, other than as necessary for the specific purpose of providing the Products for Customer according to the Agreement, or as otherwise set out in the Agreement or as permitted by the CCPA.

Our Policy Towards Children

Our Services are not directed to children under 13. and we do not knowingly collect data from users below the relevant age threshold.

If we learn that we have collected the Personal Data of a child below the relevant age threshold we will take steps to delete such information from our files as soon as possible.

Rights Under CCPA / CPRA (California Residents)



If you are a California resident, you have the following rights under the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA):

Right	Description
Right to Know	You can request information about the categories and specific pieces of personal information we collect, use, disclose, or sell.
Right to Delete	You may ask us to delete your personal information, with some exceptions (e.g., legal obligations).
Right to Correct	You can request correction of inaccurate personal information.
Right to Opt-Out of Sale or Sharing	Although Hoonr.ai does not “sell” personal data, you have the right to opt out if this were to change.
Right to Limit Use of Sensitive Personal Information	You can limit the use of sensitive data to only necessary services.
Right to Non-Discrimination	You will not be discriminated against for exercising your rights.

We strive to give you ways to access, update/modify your data quickly, or delete it unless we have to keep that information for legal purposes.

How to Exercise Your Rights

These rights can be exercised by contacting us using the details below. To exercise any of these rights, please contact us at:

Email: privacy@hoonr.ai

You may be asked to verify your identity before we can process your request.

We respond to verifiable requests within the timelines required by applicable law (typically 45 days under CCPA/CPRA).

Changes to this privacy notice

We reserve the right to update this privacy notice periodically to reflect changes in our privacy practices and legal updates. Any changes we may make to our privacy notice in the future will be posted on this page and are immediately binding without any requirement for notice.

How to contact us?



If you have any questions or comments about this privacy notice, or if you would like to exercise your rights, please send an email to privacy@hoonr.ai or write to data privacy officer Pyramid Consulting, Inc. 3060 Kimball Bridge Road, Suite 200, Alpharetta, Ga. 30022 U.S.