

Transfer Impact Summary

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This summary explains where Firstview transfers personal data outside the European Economic Area (EEA) and Türkiye, what protects those transfers, and why we consider the protection adequate. It supports customers' own transfer assessments under Chapter V of the GDPR, the UK GDPR and Article 9 of KVKK.

1. Where the data goes

Our database runs in Frankfurt, Germany, and our application servers in Germany and Finland. These sub-processors process or store data outside the EEA:

Sub-processor	Data	Country
Daily	Interview recordings	United States
Cloudflare (R2 and network)	Files such as CVs, recordings and transcripts; network traffic	Global, not limited to the EU
OpenRouter	Text sent to AI models for interview reports, live interviews and CV scoring decisions (other AI tasks are processed in the EU)	Global
Soniox	Interview audio for speech-to-text, and text for speech	United States
Cohere	Profile and job text for search	United States
Exa, Apify	Search queries and public profile data for sourcing	United States
Resend	Email addresses and message content	United States
Meta (WhatsApp)	Phone numbers and message content	United States

The full list, kept up to date, is at <https://firstview.ai/trust#subprocessors>. Some providers in the EU have parent companies in the United States, so US law can reach them too; the measures below also apply to them.

2. Transfer mechanisms

- **EU and EEA:** the EU Standard Contractual Clauses (2021/914), in our DPA with customers and in our contracts with sub-processors. Where a US provider is certified under the EU-US Data Privacy Framework, that also applies.
- **UK:** the UK International Data Transfer Addendum.
- **Switzerland:** the EU Clauses with the Swiss changes in our DPA.
- **Türkiye:** the standard contracts published by the KVKK Board, for countries without an adequacy decision. We will sign them unchanged with each provider and notify the Board within 5 business days of signing.

3. The law in the destination country

The main destination is the United States. US intelligence law, in particular Section 702 of the Foreign Intelligence Surveillance Act and Executive Order 12333, can let authorities ask cloud providers for data about non-US persons. Executive Order 14086 (2022) added necessity and proportionality limits and a redress mechanism for EU individuals; the European Commission relied on it in its 2023 adequacy decision for the Data Privacy Framework.

4. Our assessment

- **Type of data.** The data is ordinary hiring data: CVs, interview recordings and transcripts, and contact details. It is of little interest to intelligence agencies.
- **Purpose and scope.** Several providers receive data only to perform one task, such as turning speech into text or ranking search results. Our AI providers are configured not to keep prompts beyond short abuse checks where they offer it, and none may use the data for training. On this basis we consider the risk to people low, provided the measures in section 5 are applied.

5. Supplementary measures

- **Technical:** TLS for all traffic; encryption at rest with AES-256 in the database and file storage; files opened only through expiring signed links; zero data retention at AI providers where offered; no model training; minimisation (providers receive only what the task needs).
- **Contractual:** Standard Contractual Clauses with each provider; providers must tell us about government requests where the law allows, and challenge requests they consider unlawful.
- **Organisational:** if Firstview receives a government request for customer data, we will tell the customer (unless forbidden), disclose only what is strictly required, and challenge requests we consider unlawful. We publish every change to our sub-processors 30 days in advance.

6. Reducing transfers

We are moving processing into the EU where providers allow it. Most AI model traffic, our backup speech providers, the meeting bot, error tracking and analytics already run in the EU. Interview recordings, file storage and the remaining AI and speech processing are next. The sub-processor list always shows the current regions.

We review this summary when a sub-processor, a region or the law changes, and at least once a year.

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