MyInterview AI Policy

[Effective date: 03.04.2024]

1. ## Background and Purpose

   1.1.   The purpose of this policy ("**the Policy**") is to establish guidelines and best practices for the development and use of artificial intelligent tools, products, or systems by MyInterview Ltd. ("**the Company**").

   1.2.   AI tools can offer great advantages and opportunities, but they can also pose risks. Therefore, the Policy aims to ensure that the development, deployment, and use of AI tools by the Company aligns with Company's values, applicable laws, and ethical standards.

   1.3.   The Company develops a platform that aids employers recruit employees. The use of AI in the context of employee recruitment is generally regarded as a high-risk activity under the upcoming EU AI Act. Therefore, the development of AI tools and systems by the Company must follow a rigorous process of design, testing, validation, and documentation, in accordance with the best practices and standards of the industry.

2. ## Scope

   2.1.   The policy applies to all activities related to all AI-related development, testing, deployment, operation, products features, and systems in or by the Company.

   2.2.   The policy applies to all employees, departments, contractors, and subsidiaries of the Company.

   2.3.   For the purposes of the policy, "AI" refers to computer systems that able to perform tasks commonly associated with intelligent beings, including reasoning, discovering meaning, generalising, and learning from past experiences, including, but not limited to, techniques to generate new outputs such as natural language, images, videos, or recommendations.

3. ## Roles and Responsibilities Within the Company

   3.1.   Any use of AI in the Company's recruitment platform, services, and operation must be approved in advance by the Company's AI point of contact, who will refer the matter when necessary to legal review.

   3.2.   The relevant stakeholders for the development of AI include legal, compliance, and data protection officers, to ensure that the AI tools

and systems comply with all applicable laws, regulations, and ethical principles. The development team shall also seek approval from the Company's AI point of contact before deploying any AI tools or systems to the production environment or releasing them to customers or partners.

3.3. Specific roles

3.3.1. The current Company's AI point of contact is the CTO, Michael Lumbroso

3.3.2. The CTO is responsible for planning the AI systems implementation, making sure they are compliant with the latest legislations, that they are properly tested and that they are abiding to the highest standards of ethics. He is responsible for following up the latest legislations and schedule the necessary adjustments if need be.

3.3.3. The VP R&D is responsible for building the AI systems according to the specifications from the CTO, and reviewing the code for bias. He will make sure the end product has the correct controls in place.

4. **Key AI Policy Guidelines**

4.1. **Ethical Usage**: Company shall use AI tools and systems responsibly and ethically, avoiding any actions that could harm others, violate privacy, or facilitate malicious activities.

4.2. **Lawfulness:** Company shall develop and use AI tools and systems that comply with all applicable laws and regulations.

Prior to the development of new AI tools or features, Company shall assess its compliance with applicable laws and regulations, including sectorial laws and regulations that applies to AI usage in employment related matters.

Company shall use third party AI tools or systems after reviewing in advance their terms of use.

4.3. **Reliability**: Company may use reliable AI tools and systems that meet the required safety and performance standards set under any applicable laws and Company's policies.

The purchase of new third party AI tools or systems should be reviewed and pre- approved by the Company's AI point of contact.

Employees should avoid from using free versions of AI tools in sensitive decisions making processes made on Company's

platform without prior approval by the Company's AI point of contact.

4.4. **Explainability:** The development or the integration of any AI tools within Company's products, shall be done so that the Company can explain why a specific output or decision was made. This is especially essential when Company is developing AI products, and incorporating third-party AI tools, outputs, or services into its platform, to be used by its clients, candidates, or users.

As such, Company shall factor in considerations of explainability in the different development or integration stages of AI tools and systems in its products or services, such as data collection, model selection, testing and deployment.

The development of AI tools by the Company should ensure that the Company is able to extract relevant information for a range of explanations- such as the rationales that led to a decision, the people who were involved in the development of the AI tool, the data that was used in a particular decision and the steps that were taken to reduce bias or inaccuracies.

Company should identify and document the specific reasoning and variables that its AI tool factored when producing specific output that is used for the assessment of a particular candidate in the recruitment processes.

Company would document and explain what data was used to train its AI models, why was that data set chosen, how that data was collected, and by who.

Company shall be transparent with its client and prospects about the capabilities of AI features that are incorporated into its products or services.

4.5. **Accuracy**: AI tools and systems may provide convincing outputs, though they are in fact inaccurate and misleading (often referred to as "hallucinations"). Therefore, Company shall take steps to review its AI tools and systems to ensure that they produce accurate outputs.

Company shall conduct and document pre-deployment and post-deployment testing to track the accuracy and validity of the AI tools it developed or implemented in its products and services. In addition, an annual audit will be conducted to assess deeply the accuracy of the system.

4.6. **Bias Mitigation:** AI tools and outputs may be used to generate content and outputs that are inadvertently biased or discriminatory.

Therefore, the Company shall actively identify and monitor for potential bias in AI tools, services, or outputs that are incorporated into its products. As such, Company's employees and AI developers shall pay special attention to detect and prevent potential bias in its AI tools and systems based on discriminatory factors such as gender, race, age, religion, or ethnicity.

Company shall conduct periodic reviews and testing of its AI models and outputs, to reduce and eliminate bias risks, such as reviewing potential bias in its dataset or algorithms.

When developing or purchasing AI tools or models, Company shall consult with people from diverse background to identify potential bias or discriminatory factors that may affect the outputs of the AI tool.

4.7. **Human Oversight**: The training, development and usage of AI tools, services and models by the Company should be overseen by natural persons to ensure that they are not being misused in any harmful or illegal manner, and do not incorporate any unintentional bias, or discrimination. Humans can also monitor the training and operation of AI models developed by the Company to ensure that they are not being used to create harmful or discriminatory outputs.

Before releasing any AI product on behalf of the Company, its decision-making outputs should be reviewed by a human to ensure that it is accurate, safe, and unbiased.

If any of our AI tools will be used to make decisions or significant recommendations regarding the employment of specific candidates, the AI output should not be used "as is" but overseen by humans.

4.8. **Accountability and Documentation**: Company shall document key decisions made in the development, training, purchase and deployment of its AI models, products, systems, or services, to allow review and monitoring.

Company shall document the the main justifications and choices made through the development process and deployment of AI tools into its products.

Company shall document the ongoing testing and reviews it conducts to its AI product and outputs.

Company shall document any customers' or candidates' complaints about the Company's AI features and products, especially complaints regarding inaccurate, bias, or unethical use.

4.9. **Risk Assessment**: The Company's employees shall conduct internal risk assessment, following a defined procedure, before the development or use of new AI tools, services, or systems, to ensure they comply with the principles set out in this policy, applicable laws, and mitigates the potential risks.

4.10. **Transparency**: Company shall be transparent with its clients, prospects, candidates, and other users regarding its usage of AI tools and systems as part of its products and services.

As such, Company shall communicate in a clear manner to its clients, prospects, candidates, employees, and other third parties' information about why it uses AI in this context, where the Company use AI, and simple detail on how the AI tool or feature works. Special attention should be made to ensure transparency of AI features that the Company develops or that is meant to be used as part of the Company's recruitment platform.

When using a client facing AI-based chatbot, Company shall clearly disclose to the client in advance that it is interacting with an AI chatbot.

Company shall inform data subjects if it wished to use their personal data as part of the dataset used in the development process of its AI tools or features and shall do so only in accordance with applicable data protection laws.

Company will be transparent with its clients and candidates about the involvement and capabilities of AI tools within its recruitment platform.

4.11. **Monitoring:** The development team will monitor and evaluate the performance and impact of the AI tools and systems on an ongoing basis and report any issues or concerns to the Company's AI point of contact promptly.

4.12. **Data Protection**: The development, use and implementation of AI tools and systems into Company's products and services shall be in accordance with company's privacy and data security policies and procedures, as well as in accordance with applicable data protection laws and regulations.

Company shall identify and document valid grounds for collecting and using personal data in the development of its AI tools in accordance with applicable data protection laws.

When required, the Company will conduct Data Privacy Impact Assessment (DPIA) prior to to launching new AI features or services and will assist clients of its recruitment platform follow the data

protection laws applicable to them, especially for clients required to conduct a DPIA according to the GDPR or UK GDPR.

AI tools, systems and outputs used in the development of Company's products should be checked and validated for security vulnerabilities on a regular basis in accordance with the Company data security policies and applicable laws.

4.13. **IP Infringement:** Output of AI tools, and especially of generative AI tools may be subject to copyright protection or other intellectual property rights ("**IP**") protection. Company usage of AI tools shall refer infringing third parties IP rights.

The Company should only use datasets that does not infringe third-party IP rights when developing new AI tools or systems.

The Company's usage of third-party AI tools or outputs should comply with their license terms.

4.14. **Usage of Third-Party AI:** Before using any third-party AI services or tools, Company's employees shall ensure that the AI vendor meets the ethical standards and legal requirements as outlined in the Policy. Additionally, company's employees shall make sure that any usage of third-party AI services or tools comply with these tools' terms of use.

Any usage of third-party AI tools on behalf of the Company shall be approved in advance by the CTO, to ensure the reliability and compliance of such AI tools with the principles set out in this Policy.

4.15. **AI Training:** Prior to any usage of any AI tool or output, Company's employees shall complete training about the benefits and risks of using AI tools or systems, principals of responsible and ethical AI tools usage, and how to avoid potential misuse of these tools. As part of such AI training, each employee shall review the terms of this Policy.

Additionally, company shall require its employees to undergo periodic AI training.

5. Policy Review and Update

5.1. The Policy shall be reviewed and updated as needed based on changes in technology, applicable laws, or organizational needs.

5.2. Changes and updates in the Policy shall be communicated by the Company to all relevant stakeholders.