GenSphire Privacy Statement

Last updated: November 25, 2026

1. Who we are and how to contact us

GenSphire LLC, doing business as GenSphire® ("GenSphire," "we," "our," or "us"), is a workforce and recruitment firm based in California, USA. This Privacy Statement (the "Statement") explains how we collect, use, share and protect your Personal Data. GenSphire LLC is the business responsible for your Personal Data.

Jennie Jackson, Founder, is the person responsible for privacy at GenSphire. You can reach her with any privacy question, request or complaint:

- Email: Jennie@GenSphire.com
- Phone: +1 (408) 320-8424
- Mail: GenSphire LLC, P.O. Box 454, Kentfield, CA 94914, USA

This Statement applies alongside any privacy terms in a contract or statement of work we have with you.

2. Definitions

- "Candidate" means an individual we contact, interview or consider for a role with a Client, or who sends us a resume or application.
- "Client" means a company or individual that engages GenSphire for services such as executive search, talent intelligence or career coaching.
- "Contractor" means an individual engaged through GenSphire to work on assignment for a Client.
- "Vendor" means a company or independent professional that works, or asks to work, for GenSphire.
- "Personal Data" means any information that identifies, relates to, describes, or can reasonably be linked to an individual or household.
- "Processing" means anything done with Personal Data, such as collecting, recording, storing, using, sharing or deleting it.

3. Personal Data we collect

Depending on how you deal with us, we may collect:

- **Identifiers and contact details**, such as your name, email address, phone number, postal address and LinkedIn profile.
- **Professional and education information**, such as your resume, work history, skills, qualifications, references, compensation expectations and career goals.
- **Assignment information** for Contractors and Vendors, such as role, Client, dates, hours, contract terms and work product.
- **Right-to-work information**, where a role requires it, such as citizenship or work authorization for the country where the role is based.
- **Payment and tax information** for Contractors, Vendors and Clients, such as bank details, tax identification numbers and invoices.
- **Communications and information you choose to give us**, such as emails, contact form messages, files you upload, and our notes from calls and interviews.
- **Audio and visual information**, such as photographs and, only with your agreement, recordings of video calls.
- **Marketing preferences**, such as whether you subscribe to our newsletter.
- **Website technical data**, such as IP address, browser type and the date and time of your visit, recorded in our web host's server logs.

Sensitive Personal Data

Some of this is treated as sensitive under privacy laws: government identification and tax numbers, citizenship or immigration status, and any health or disability information you give us to request an accommodation. We use it only as needed to place you in a role, to pay you, and to comply with the law. We do not ask Candidates in the United Kingdom or European Economic Area for information about race or ethnic origin, health, religion, sexual orientation or trade union membership, and we ask you not to include it in your resume.

If you do not provide Personal Data

Where we need Personal Data to provide our services or to meet a legal or contractual requirement and you do not provide it, we may not be able to work with you. We will tell you if that is the case.

4. How we collect Personal Data

- **From you**, when you send us your resume, complete our contact form, subscribe to our newsletter, book a meeting, or speak or correspond with us.
- **From professional networking sites and public sources.** We use LinkedIn Recruiter to search for and contact people whose professional background may fit a role. We may also use other publicly available professional information.
- **From others**, such as Clients, referrals and references you name.
- **From our website.** Our web host records standard server log data. Our website uses only the cookies needed to make it work. We do not use analytics cookies, advertising cookies or tracking pixels. If that changes, we will update this Statement and ask for your consent where the law requires it.

If we obtained your details from LinkedIn, a referral or another source rather than from you, we will tell you where we got them and point you to this Statement when we first contact you.

5. How we use Personal Data

We use Personal Data to:

- find, contact and assess Candidates for roles with our Clients;
- present Candidates to Clients and support interviews, offers and placements;
- provide coaching, research and other services to Clients;
- assess eligibility to work in the country where a role is based;
- engage and pay Contractors and Vendors;
- respond to enquiries, feedback and complaints;
- send our newsletter to people who subscribe;
- keep our website and systems secure and working;
- comply with legal obligations and keep required records; and
- establish, exercise or defend legal claims.

6. How we use artificial intelligence

GenSphire works with AI and AI-driven tools, mainly for research such as talent and competitive intelligence, and for drafting.

- **A person decides.** Jennie Jackson directs all research and personally reviews every deliverable and every Candidate. GenSphire does not make decisions about Candidates by automated means alone, and does not use AI to reject Candidates automatically.
- **LinkedIn Recruiter.** LinkedIn uses AI to suggest and order the profiles shown in our searches. We review those profiles ourselves and decide whom to contact.
- **Minimum information.** We share with AI tools only the information a task needs, and we use settings that keep your information from being used to train AI models.
- **Client systems.** Our Clients may use their own applicant tracking systems and AI tools once you apply to them. Those systems are governed by the Client's own privacy policies.

You can ask us at any time how AI was used in connection with your information, and you can ask for a person to review any decision.

7. How we disclose Personal Data

Clients. We share Candidate and Contractor information with Clients for evaluation, hiring and placement. Candidates we represent sign a right-to-represent authorization. Before we send your resume to a specific Client, we tell you which Client it is, and you may decline.

Service providers. We use the providers below to run our business. They may process Personal Data only to provide their services to us. All are based in the United States.

Type of service	Current provider
Email, documents, storage, scheduling, phone and video meetings	Google Workspace
Finding and messaging Candidates and tracking searches	LinkedIn Recruiter (LinkedIn is a Microsoft company)
Video interviews and meetings	Zoom
Newsletter delivery	Mailchimp
Agreements, electronic signature and PDF documents	DocuSign and Adobe
Payroll and Contractor payments	Gusto

Type of service	Current provider
Website hosting and contact form delivery	Bluehost
Devices and device backup	Apple
Research and drafting support	AI service providers, as described in section 6

We may change providers within these types of service from time to time. Contact us for the current list. LinkedIn also handles member information under its own privacy policy.

No sale or sharing for advertising. We do not sell Personal Data. We do not share it for cross-context behavioral advertising. We do not send marketing text messages, and we do not give your phone number to anyone for marketing.

Business transfers. If GenSphire is sold or merged, Personal Data may transfer to the new owner, who must continue to honor this Statement.

Legal reasons. We may disclose Personal Data where required by law or legal process, in response to lawful requests from government authorities, to prevent harm or loss, or in connection with an investigation of suspected unlawful activity.

8. How long we keep Personal Data

We keep Personal Data only as long as needed for the purpose it was collected for, and then delete or anonymize it.

Information	How long we keep it
Candidates in the UK, EEA and Canada who are not placed	1 year after our last contact with you, unless you agree to stay on file longer
Applicant, referral and placement records in the United States	4 years after the record is created or the placement decision is made
Contracts, invoices and payment records	7 years after the end of the tax year they relate to
Contact form enquiries	1 year after the enquiry is closed
Newsletter subscription	Until you unsubscribe

We may keep information longer where the law requires it or where it is needed for a legal claim.

9. How we protect Personal Data

We use technical, administrative and physical safeguards designed to protect Personal Data from unauthorized access, disclosure or misuse. Our website and its forms use Transport Layer Security (TLS) encryption. We hold business data with established cloud providers, not on our own servers, and limit access to people who need it for their work.

10. Third-party sites

Our website links to sites and services run by others, including LinkedIn, Facebook, Bluesky, Substack, Buy Me a Coffee and Google Calendar booking. GenSphire does not control these sites. Their own privacy policies govern what they collect, and we recommend you read them.

11. Children

Our website and services are for adults. We do not knowingly collect Personal Data from anyone under 18. If you believe a child has given us Personal Data, please contact us and we will delete it.

12. Region-specific information

A. California and other US states

GenSphire follows the California Consumer Privacy Act ("CCPA") as a matter of good practice for California residents, whether or not the law applies to a business of our size. California residents have the right to:

- **Know** what Personal Data we have collected about you, where we got it, why we use it, who we disclosed it to, and the specific pieces we hold. You may ask twice in any 12 months.
- **Delete** Personal Data we collected from you, subject to legal exceptions.
- **Correct** inaccurate Personal Data.

- **Opt out of sale or sharing.** We do not sell Personal Data or share it for cross-context behavioral advertising, so there is nothing to opt out of. If that ever changes, we will add an opt-out link to our website and honor Global Privacy Control signals.
- **Limit the use of Sensitive Personal Information.** We already use it only for the limited purposes described in section 3.
- **Automated decision-making.** We do not use automated decision-making technology to make significant decisions about you. If that changes, we will give you notice before using it, and a way to opt out.
- **Non-discrimination.** We will not treat you differently for exercising your privacy rights.

How to make a request. Email Jennie@GenSphire.com or call +1 (408) 320-8424. You, or a person you authorize in writing, may make a request. Include your full name and email address and describe your request so that we can verify your identity and respond.

Timing. We confirm receipt within 10 business days and respond within 45 days. If we need more time, up to another 45 days, we will tell you why in writing. Requests are free unless they are clearly unfounded or excessive.

Residents of other US states may contact us in the same way, and we will honor requests to access, correct or delete Personal Data wherever we reasonably can.

B. Canada, including Quebec

Person in charge. Jennie Jackson, Founder, is GenSphire's Privacy Officer and the person in charge of the protection of personal information. Her contact details are in section 1.

Where your information goes. GenSphire is based in the United States, and our service providers store information there. Your personal information is therefore held outside Canada and outside Quebec, and may be accessible to US authorities under US law.

Your rights. You may ask us to:

- give you access to your personal information and tell you how we have used and disclosed it;
- correct information that is inaccurate, incomplete or out of date;
- delete information we no longer need; and
- stop using it, by withdrawing your consent, subject to legal or contractual limits.

Additional rights in Quebec. If you live in Quebec, you may also ask us to stop disseminating your personal information or to de-index it, ask for your information in a structured, commonly used format, and be told when a decision is based exclusively on automated processing. We do not make decisions that way (see section 6).

Requests and complaints. Contact our Privacy Officer. We respond within 30 days. If you are not satisfied, you may complain to the Office of the Privacy Commissioner of Canada or, in Quebec, the Commission d'accès à l'information.

C. United Kingdom and European Economic Area

This section applies if you are in the United Kingdom ("UK") or the European Economic Area ("EEA"). It reflects the UK General Data Protection Regulation and Data Protection Act 2018, and the EU General Data Protection Regulation.

Controller. GenSphire LLC is the controller of your Personal Data. Jennie Jackson, Founder, is the privacy contact. Contact details are in section 1.

Why we may use your Personal Data (legal bases).

Purpose	Legal basis
Finding, contacting and assessing Candidates, and presenting them to Clients	Legitimate interests: running a recruitment business and connecting people with roles that fit their experience. We ask your agreement before sending your resume to a named Client.
Providing coaching and other services to individual Clients; engaging and paying Contractors and Vendors	Performance of our contract with you
Sending our newsletter	Your consent, which you can withdraw at any time by unsubscribing
Checking eligibility to work; keeping tax and legal records	Legal obligation
Website security; handling enquiries, complaints and legal claims	Legitimate interests: operating safely and protecting our legal position

Where we rely on legitimate interests, you have the right to object. If we ever need sensitive (special category) information about you, we will ask for your explicit consent first.

Where we got your information. If you did not give it to us yourself, it came from LinkedIn, another public professional source, a Client or a referral (see section 4).

International transfers. GenSphire and its service providers are in the United States, so your Personal Data is processed there. Where a Client or partner in the UK or EEA sends us Personal Data, we put appropriate safeguards in place with them, such as the UK International Data Transfer Agreement or Addendum and the European Commission's Standard Contractual Clauses. You may ask us for details of the safeguards that apply to your Personal Data.

How long we keep it. See section 8.

Your rights. You have the right to:

- access your Personal Data and receive a copy;
- have inaccurate data corrected;
- have your data erased in certain circumstances;
- restrict how we use your data;
- receive your data in a portable format;
- object to our use of your data, including for direct marketing; and
- withdraw consent at any time, where we rely on consent.

To exercise a right, contact us using the details in section 1. We respond within one month, free of charge.

Automated decisions. We do not make decisions about you based solely on automated processing. A person reviews every decision (see section 6).

Complaints. If you are unhappy with how we have handled your Personal Data, email Jennie@GenSphire.com with the word "Complaint" in the subject line. We acknowledge complaints within 30 days, look into them without undue delay, and tell you the outcome. You also have the right to complain to a regulator:

- in the UK, the Information Commissioner's Office (ico.org.uk);
- in the EEA, the data protection authority in the country where you live or work.

13. Changes to this Statement

We may update this Statement from time to time. The date at the top shows when it was last changed. For significant changes, we will post a notice on our website.

14. Questions

If you have any questions or concerns about this Statement, contact GenSphire® Founder Jennie Jackson at Jennie@GenSphire.com, +1 (408) 320-8424, or GenSphire LLC, P.O. Box 454, Kentfield, CA 94914, USA.