

PRIVACY POLICY

BrainShells Limited
Website: <https://brainshells.io>

Effective / Last updated: 26 August 2026

This Privacy Policy explains how BrainShells Limited (“BrainShells”, “we”, “us”, or “our”) collects, uses, discloses, stores, and protects personal information when you visit <https://brainshells.io> (the “Site”), submit an application or inquiry through our forms, or otherwise communicate with us.

***Important:** This document is drafted for public website visitors and recruitment candidates based on the publicly observable functionality of brainshells.io as of the effective date. It is not legal advice. Replace placeholder assumptions only where your internal practices differ, and have counsel review before publication.*

1. Who we are (controller)

For personal data processed through the Site and related recruitment communications, the data controller is:

Legal name	BrainShells Limited
Company number	3054936 (Hong Kong)
Registered address	Rm 7B, One Capital Place, 18 Luard Road, Wan Chai, Hong Kong
Website	https://brainshells.io
Privacy / contact email	hello@brainshells.io (also published as hello@brainshells.com)

If you are located in the European Economic Area (EEA), the United Kingdom, or Switzerland, we process personal data as a controller under the EU GDPR / UK GDPR to the extent those laws apply to our activities (for example, where we offer roles to, or monitor the behaviour of, individuals in those regions via the Site).

2. Scope of this Policy

This Policy applies to:

- visitors browsing the Site;
- individuals who contact us by email;
- job applicants and candidates who submit their name, contact details, résumé/CV link, and message via Site forms;
- any similar inquiries submitted through vacancy pages on the Site.

This Policy does **not** cover client products that BrainShells develops for the gaming industry, employee HR files beyond recruitment intake described here, or third-party websites linked from the Site. Those may have separate notices.

3. Notice at collection (what we collect and why)

We collect the following categories of personal information. Collection points include the “Join our team” / contact form (fields: Name; Your contact / preferred communication channel; Link to resume; Message; consent checkbox) and email sent to hello@brainshells.io.

3.1 Information you provide

- **Identifiers and contact data:** name; email address or other contact channel you choose to provide;
- **Application materials:** link to your résumé/CV or portfolio; free-text message; any information contained in those materials (education, work history, skills, compensation expectations if you include them);
- **Consent record:** confirmation that you agreed to this data processing / privacy policy when submitting the form;
- **Correspondence:** content of emails and follow-up communications.

3.2 Information collected automatically

- **Technical / usage data:** IP address, browser type, device and operating system information, referring URL, pages viewed, timestamps, and similar log data generated when you access the Site;
- **Security / anti-bot signals:** the Site uses Cloudflare Turnstile on the application form to distinguish humans from automated bots. Cloudflare may process limited technical data (such as IP address and interaction signals) for that purpose;
- **Hosting / CDN data:** the Site is built and hosted with Webflow and loads assets from Webflow / CDN providers (including website-files and related infrastructure). Those providers process technical data needed to deliver the Site.

As of the effective date, the public Site source does **not** appear to embed dedicated third-party advertising pixels or Google Analytics tags. If we later enable non-essential analytics or advertising cookies, we will update this Policy and, where required, obtain consent via a cookie banner.

3.3 Sources

- directly from you (forms, email);
- automatically from your device/browser when you use the Site;
- from service providers that help us host, secure, and operate the Site (Webflow, Cloudflare, email infrastructure).

3.4 Sensitive personal information

We do not request special-category / sensitive data (for example health, biometric identifiers for identification, racial or ethnic origin, political opinions, or religious beliefs) through the Site. Please do not include such information in your résumé or message unless a specific role legally requires it and we ask for it separately. If you voluntarily submit sensitive information, we will process it only as necessary to handle your application or as required by law.

4. Purposes and legal bases

We use personal information for the purposes below. Where GDPR / UK GDPR apply, the corresponding legal bases are indicated.

Purpose	Data involved	Legal basis (GDPR / UK GDPR)
Recruitment and candidate evaluation	Name, contact details, résumé link, message, correspondence	Consent (Art. 6(1)(a)); steps prior to contract (Art. 6(1)(b)); legitimate interests in hiring (Art. 6(1)(f))
Responding to inquiries	Contact details and message content	Consent; legitimate interests in communicating with interested persons
Operating, securing, and troubleshooting the Site	Technical logs, IP, device data, Turnstile signals	Legitimate interests (security, fraud/bot prevention, Site reliability); legal obligation where applicable
Maintaining business records and defending legal claims	Application and correspondence records	Legitimate interests; legal obligation

Improving Site content and candidate experience (aggregated / limited analytics if enabled)	Technical usage data	Consent where required for non-essential cookies; otherwise legitimate interests
---	----------------------	--

Where we rely on **consent** (including the checkbox “I agree with the data processing policy”), you may withdraw consent at any time by emailing hello@brainshells.io. Withdrawal does not affect processing already lawfully carried out. Where we rely on **legitimate interests**, you may object as described in Section 10.

5. Artificial intelligence

BrainShells develops AI-related technologies for business and gaming-industry projects. **The public Site itself** is a company and careers website. We do not use an on-site chatbot to make automated hiring decisions about you.

We do **not** use Site application data to train public foundation models. If we use internal tools (including AI-assisted screening aids) to help our recruiters organise or summarise applications, a human remains responsible for hiring decisions. We do not make solely automated decisions that produce legal or similarly significant effects about Site visitors or candidates within the meaning of GDPR Article 22.

6. How we share personal information

We do not sell personal information for money. We disclose personal information only as needed to operate the Site and recruitment process:

- **Service providers / processors:** website hosting and CMS (Webflow and its infrastructure/CDN); security and bot protection (Cloudflare Turnstile); email and IT service providers that process messages sent to hello@brainshells.io;
- **Internal recipients:** BrainShells hiring managers, recruiters, and relevant team members assessing your application;
- **Professional advisers:** lawyers, auditors, or consultants where reasonably necessary;
- **Authorities:** when required by applicable law, court order, or to protect rights, safety, and security;
- **Business transfers:** in connection with a merger, acquisition, reorganization, or sale of assets, subject to appropriate safeguards.

Providers are engaged under contractual terms requiring them to process personal data only on our instructions and to implement appropriate security measures, where required by law.

7. International transfers

BrainShells Limited is established in Hong Kong. The Site is delivered through global hosting and CDN infrastructure. Personal data you submit may therefore be processed in Hong Kong, the United States, the EEA, or other countries where our providers operate.

Where GDPR / UK GDPR require a transfer mechanism, we rely on appropriate safeguards such as the European Commission’s Standard Contractual Clauses (and UK addendum / IDTA where applicable), provider certifications or frameworks where available, and technical/organisational measures. You may request more information about transfer safeguards by contacting hello@brainshells.io.

8. Retention

We keep personal information only as long as needed for the purposes described above, including legal, accounting, and dispute-resolution requirements.

Category	Retention period
Job applications and candidate correspondence	Up to 24 months after the last interaction / closing of the relevant recruitment process, unless you ask us to delete sooner (subject to legal holds) or a longer period is required to establish, exercise, or defend legal claims

General inquiry emails (non-recruitment)	Up to 24 months after resolution, unless needed longer for ongoing dialogue or legal reasons
Consent / form submission records	For the period of processing plus a reasonable evidence period (typically aligned with the related application record)
Security, server, and anti-bot logs	Typically 30–90 days, unless needed longer to investigate security incidents
Strictly necessary website cookies / session storage	For the session or the short lifetime required to operate the Site

9. Security

We implement technical and organisational measures appropriate to the risk, including HTTPS transport encryption, access controls for recruitment inboxes and systems, provider due diligence, and bot-protection on the application form. No method of transmission or electronic storage is completely secure; we cannot guarantee absolute security.

10. Your rights

10.1 EEA / UK / Switzerland (where GDPR / UK GDPR apply)

Subject to legal limits, you may request: access to your personal data; rectification; erasure; restriction of processing; data portability; objection to processing based on legitimate interests; and withdrawal of consent. You also have the right to lodge a complaint with your local supervisory authority (in the UK, the Information Commissioner's Office).

10.2 California and other U.S. state privacy laws (if applicable)

Depending on your state of residence and whether statutory thresholds apply to BrainShells, you may have rights to know/access, delete, correct, and opt out of “sale” or “sharing” of personal information and targeted advertising. **We do not sell personal information for money.** We do not knowingly use Site data for cross-context behavioural advertising. If our practices change, we will provide a “Do Not Sell or Share My Personal Information” link and honour Global Privacy Control (GPC) signals where required.

10.3 Hong Kong PDPO

Under the Personal Data (Privacy) Ordinance, you may request access to and correction of your personal data held by us, subject to applicable exemptions.

10.4 How to exercise rights

Email hello@brainshells.io with the subject line “Privacy Request”. Describe the right you wish to exercise and enough information for us to verify your identity and locate your data (for example, the email or contact details used in your application). We will respond within the timeframe required by applicable law (generally within one month under GDPR).

11. Children

The Site is directed to adults seeking professional roles. We do not knowingly collect personal information from children under 16 (or under 13 where U.S. COPPA would apply). If you believe a child has submitted personal data, contact us and we will delete it.

12. Cookies and similar technologies

The Site may use cookies, local storage, or similar technologies that are **strictly necessary** to provide the website, remember language preferences, maintain session security, and enable Webflow functionality. Cloudflare Turnstile may set or read technical data needed for bot protection.

We do not currently operate a marketing cookie wall for advertising trackers on the public Site. You can control cookies through your browser settings; blocking some cookies may affect Site features. If we introduce

non-essential analytics or advertising cookies, we will (a) update this Policy, (b) disclose cookie categories, providers, and durations, and (c) obtain opt-in consent in regions that require it (EEA/UK) and provide opt-out / GPC support where U.S. state laws require it.

13. Do Not Track

Some browsers send a “Do Not Track” signal. There is no consistent industry standard for responding to DNT. We currently respond to applicable legal opt-out mechanisms (including GPC if/when sale/share or targeted advertising is enabled) rather than DNT.

14. Changes to this Policy

We may update this Policy from time to time. The “Effective / Last updated” date at the top will change when we do. Material changes may also be notified by a notice on the Site or by email where appropriate. The version published on <https://brainshells.io> (or linked from the Site footer) is the controlling version.

15. Contact

For privacy questions, requests, or complaints:

BrainShells Limited

Rm 7B, One Capital Place, 18 Luard Road, Wan Chai, Hong Kong

Email: hello@brainshells.io

End of Privacy Policy — BrainShells Limited — <https://brainshells.io>