

Upwage AI Governance Executive Summary

Official Document

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Introduction

At Upwage, our mission is to revolutionize talent acquisition through advanced, ethical, and transparent AI-driven solutions. We recognize the critical importance of complying with various regulations to ensure the highest standards of data privacy, security, and fairness. This executive summary highlights our AI governance framework along with our commitment to compliance with state and city regulations, OFCCP and EEOC guidelines, CCPA and GDPR requirements, and progress towards SOC 2 Type 1 certification. These efforts underscore our dedication to protecting the information entrusted to us by our clients and users, fostering trust, and upholding the integrity of our AI systems.

AI Governance Framework

Upwage's AI governance framework is guided by applicable sections of the [NIST AI Risk Management Framework](#) and based on three key documents that provide comprehensive insights into our practices. The **Upwage AI Transparency Report** details our AI practices, including the methodologies behind our AI agents, data management policies, and steps to ensure responsible AI usage. This report emphasizes the importance of transparency in AI, providing stakeholders with a clear understanding of AI operations and promoting trust through openness and accountability. The **Upwage Ethical AI Policy** outlines our commitment to ethical AI development, focusing on principles such as fairness, transparency, and accountability. It highlights our practices for mitigating biases, ensuring non-discrimination, protecting privacy, and maintaining human oversight in critical AI decisions. Lastly, the **Upwage Data Privacy and Security Measures Report** provides a detailed account of our data protection practices, including data collection, storage, processing, and sharing. This report explains our compliance with data privacy regulations, the implementation of security measures, and our efforts to maintain user trust through robust data protection policies.

State & City Regulations Compliance

Upwage is dedicated to adhering to state and city regulations that govern the use of AI in employment. We comply with New York Local Law 144 by conducting annual third-party bias audits of our AI agents and publicly posting the results to ensure transparency and accountability. In Utah and Illinois, we comply with the Artificial Intelligence Policy Act (Senate Bill 149) and HB 3773 by providing clear consumer disclosures at the outset of AI interactions and upon request. For the Colorado AI Act (Senate Bill 24-205), effective February 1, 2026, we implement comprehensive documentation, developer disclosures, and annual impact assessments to ensure compliance with AI system regulations.

Regulation	State/City	Effective Date	Annual 3rd Party AI Bias Audit	AI Bias Audit Findings Disclosure	Candidate Consent	AI Governance Framework
New York Local Law 144	New York City	July 5, 2023	✓	✓	✓	Not Required
The Artificial Intelligence Policy Act (Senate Bill 149)	Utah	May 1, 2024	Not Required	Not Required	✓	Not Required
House Bill 3773	Illinois	January 1, 2026	Not Required	Not Required	✓	Not Required

The Colorado AI Act (Senate Bill 24-205)	Colorado	February 1, 2026		Not Required		
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Employment Regulations Compliance

Upwage ensures compliance with the Office of Federal Contract Compliance Programs (OFCCP) and Equal Employment Opportunity Commission (EEOC) regulations by implementing robust measures to prevent discrimination in hiring practices. We conduct quarterly internal bias assessments and annual third-party bias audits to identify and mitigate potential biases in our AI models. Our AI products are designed with built-in EEOC compliance guardrails to help prevent discussions or decisions based on protected attributes. Additionally, we anonymize candidate data to protect privacy and ensure assessments are based solely on qualifications and competencies.

Regulation	Annual 3rd Party Bias Audit	Quarterly Internal Bias Audit	Candidate Protected Attributes AI Guardrails	Candidate Data Anonymization	Customer Compliance Partnerships	Candidate Consent	Candidate Right to Access Data	Candidate Right to Rectify Data	Candidate Right to Delete Data
EEOC Requirements									

OFCCP Requirements	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
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Data Protection Regulations Compliance

Upwage is committed to complying with the California Consumer Privacy Act (CCPA) and the General Data Protection Regulation (GDPR). We ensure transparency and user control over personal data by providing detailed information on data collection, usage, and protection through our [Privacy Policy](#) and [Terms & Conditions](#). We obtain explicit consent from users before collecting their data and provide options for data access, rectification, and erasure. Our data retention policies balance operational needs with privacy rights, and we implement stringent access controls and encryption to safeguard personal data. We continuously monitor and update our practices to maintain compliance with these regulations.

Regulation	Disclosed Privacy Policy	Disclosed Terms & Conditions	Data Security Policies & Controls	Data Protection Impact Assessments	Data Incident Response Protocols	Data Minimization	Candidate Consent	Candidate Right to Access Data	Candidate Right to Rectify Data	Candidate Right to Delete Data	Candidate "Opt-out" Option
CCPA Requirements	✓	✓	Not Required	Not Required	Not Required	✓	✓	✓	✓	✓	✓
GDPR Requirements	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Data Privacy & Security Measures

Upwage is in the process of obtaining SOC 2 Type 1 certification to further enhance our data security and compliance framework. This certification evaluates our system's design and implementation of controls relevant to security, availability, and confidentiality. By achieving SOC 2 Type 1 certification, we demonstrate our commitment to maintaining the highest standards of data protection and building trust with our customers. We utilize [Drata](#), an advanced compliance automation platform, to continuously monitor and maintain our compliance with various regulatory frameworks, ensuring our security measures are always up-to-date and effective. As an additional security measure, we also engage in bi-annual 3rd-party penetration testing to identify and address potential security vulnerabilities.

Certification	Status	"As of" Date	3rd Party Audited Data Security Policies	3rd Party Audited Data Security Frameworks	3rd Party Audited Data Security Controls	3rd Party Audited Vendor Assessments	3rd Party Audited Data Security Risk Assessments	3rd Party Audited Personnel Data Security Controls
SOC 2 Type 1	In Progress	August 9, 2024	✓	✓	✓	✓	✓	✓

Conclusion

Upwage's unwavering commitment to regulatory compliance, data privacy, and security underscores our dedication to ethical AI development and transparent business practices. By adhering to state and city regulations, OFCCP and EEOC guidelines, CCPA and GDPR requirements, and achieving SOC 2 Type 1 certification, we ensure that our AI-driven solutions are not only innovative but also secure and fair. We invite our customers and stakeholders to engage with

us, provide feedback, and join us in our mission to uphold the highest standards of data protection and AI ethics. Together, we can build a future where AI technologies are trusted, reliable, and beneficial for all.