

Applicant Data Privacy Notice

Effective Date: 07/28/2026

Ireland

Curriculum Associates, LLC (“Curriculum Associates,” “CA,” “we”) provides this notice to applicants for roles based in Ireland. It explains how we process your personal data and your rights under the EU General Data Protection Regulation (“GDPR”) and the Data Protection Act 2018 (Ireland).

Controller and contact

Curriculum Associates is the data controller for your application data. Our Irish establishment is SoapBox Labs Limited.

Personal data we process

We process the contact details, work history, skills, education, certifications, and other information in your application materials and profile; recruiting communications; and, as described in the AI-use notice, publicly available information such as your LinkedIn profile that our recruiters review. Information revealing racial or ethnic origin is special category personal data under the GDPR and receives the additional protections described below.

How we use AI in recruiting, and automated decision-making

We use Eightfold, an AI-supported talent acquisition platform, to analyze your application against open roles and to categorize your profile (for example, as a potential strong or good match) to support our recruiters. The platform does not make hiring decisions, does not autonomously reject, advance, or select applicants, and shows no numerical score.

Automated decision-making. Our use of Eightfold may constitute automated decision-making, including profiling, that produces legal or similarly significant effects concerning you as an applicant. We carry out this processing based on your explicit consent, as recorded in our AI-Use Notice and Consent Form. We allow you to choose not to have your data processed using AI and provide a meaningful alternative process.

How the platform processes your data. The platform assesses the relevance, duration, and recency of your work experience; technical and professional skills; educational background; certifications and licenses; and your overall alignment to the posted role requirements. It produces a match categorization — for example, “potential strong match” or “potential good match” — provided to our recruiting team as one input in their assessment of your application.

Significance and consequences. The match categorization may affect the priority and manner in which your application is reviewed by our recruiting team. It does not determine whether you are offered a role — all hiring decisions are made by authorized human recruiters who review every candidate. Because the categorization materially influences the review of your application, we treat this processing as having a significant effect on you.

Your rights. Because this processing is based on your explicit consent, you have the right to:

- obtain human intervention — to request that a recruiter review your application without reliance on the platform’s categorization;
- express your point of view regarding the automated assessment; and
- contest the automated assessment and request that a decision be made on a different basis.

To exercise any of these rights, contact people@cainc.com.

Withdrawing consent. You may withdraw your consent to this automated processing at any time by contacting people@cainc.com or by selecting the opt-out option in the AI-Use Notice and Consent Form. Withdrawal does not affect the lawfulness of processing carried out before withdrawal. If you withdraw consent, CA will arrange an alternative, non-automated screening process; this will not affect your eligibility for the role.

EU AI Act. AI systems used for recruitment are classified as high-risk under the EU AI Act. As a deployer, we apply human oversight and provide transparency to candidates. We comply with the applicable obligations as they take effect and will update this notice accordingly.

Legal bases for processing

We rely on the following legal bases under the GDPR:

- **Pre-contractual steps.** Processing necessary to take steps prior to entering a contract with you — evaluating your application and deciding whether to offer employment.
- **Legitimate interests.** Our legitimate interests in assessing suitability, running an efficient and consistent recruiting process, and protecting our legal interests, balanced against your rights and freedoms.
- **Legal obligation.** Compliance with a legal obligation where processing is required by applicable law.
- **Consent.** Your consent, where we specifically request it for optional processing; you may withdraw consent at any time without affecting prior lawful processing.

Special category data. We process data revealing racial or ethnic origin only where a GDPR condition applies — typically your explicit consent or our obligations under employment law — and only for equal-opportunity monitoring and to administer our hiring process.

Provision of data

Providing your personal data is necessary for us to consider your application. Where you do not provide information we require, we may not be able to process your application. Providing information for equal-opportunity monitoring is voluntary.

Your rights

Subject to the conditions in the GDPR, you have the right to:

- access your personal data and obtain a copy;
- have inaccurate data rectified and incomplete data completed;
- have your data erased in certain circumstances;
- restrict or object to processing, including processing based on legitimate interests;
- receive your data in a portable format where processing is based on consent or contract and carried out by automated means; and
- withdraw any consent at any time.

To exercise these rights, contact people@cainc.com. You also have the right to lodge a complaint with the Data Protection Commission, Ireland (21 Fitzwilliam Square South, Dublin 2, D02 RD28; www.dataprotection.ie).

International transfers

Eightfold and certain of our service providers are located in the United States, so your personal data may be transferred outside the European Economic Area. We safeguard these transfers using the

European Commission's Standard Contractual Clauses together with supplementary measures, and, where applicable, the EU–U.S. Data Privacy Framework adequacy decision. You may request a copy of the relevant safeguards by contacting people@cainc.com.

Recipients and service providers

We disclose your data to our talent acquisition platform provider (Eightfold) and to other recruiting, hosting, and security providers acting as our processors, each bound to process it only on our documented instructions and to keep it secure. Your personal data is not used to train AI models; Eightfold may use de-identified, aggregated data that cannot reasonably be linked to you to improve the performance, accuracy, and fairness of its tools.

Retention and security

We keep your application data only as long as necessary for the purposes above and to meet legal obligations — generally 18 months from the date of your application — after which it is deleted or anonymized. Your data is stored securely within the platform and accessible only to authorized CA personnel involved in hiring.

Inquiry, review, and appeal

If you were not selected and have questions about how your application was evaluated, including the role of the platform, contact people@cainc.com within 30 days of your decision notice for a general explanation of the factors and criteria applied.

Changes to this notice

We review this notice regularly and post updates within our job-application platform. Where required, we will bring material changes to your attention.

Contact us

For any privacy questions or requests, contact people@cainc.com.
