

# Applicant Data Privacy Notice

Effective Date: 07/28/2026

India

Curriculum Associates, LLC (“Curriculum Associates,” “CA,” “we”) provides this notice to applicants for roles in India. It explains how we process your personal data and your rights under the Digital Personal Data Protection Act, 2023 (“DPDP Act”) and the Digital Personal Data Protection Rules, 2025 (“DPDP Rules”).

## Data Fiduciary and contact

Curriculum Associates is the Data Fiduciary for your application data, and you are the Data Principal.

## Personal data we process and the purposes

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. We process this data to assess your suitability for open roles, conduct our recruiting and selection process (including the AI-assisted evaluation described below), verify your qualifications, comply with applicable law, and protect our legal interests.

**Sensitive personal data.** Where we collect sensitive personal data under the SPDI Rules (for example, certain financial or identification information), we do so with your consent, use it only for the stated purpose, and protect it with reasonable security practices consistent with recognized industry standards and best practices. Under the DPDP Act, we process special categories of personal data only with your explicit consent and only for the purposes stated in this notice.

## How we use AI in recruiting

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. A human recruiter reviews every applicant and makes all hiring decisions, using the platform’s output as one input among many.

## Consent

We process your personal data on the basis of your consent. Consistent with the DPDP Act, your consent is free, specific, informed, unconditional, and unambiguous, and is limited to the personal data necessary for the stated purposes. You may withdraw your consent at any time; withdrawing it will be as easy as giving it, and withdrawal does not affect processing carried out before withdrawal. To withdraw consent or to opt out of AI-assisted processing, contact [people@cainc.com](mailto:people@cainc.com)

and we will arrange an alternative process.

## Your rights as a Data Principal

Subject to the DPDP Act and the DPDP Rules, you have the right to:

- **Access.** Obtain a summary of the personal data we process and the processing activities, and the identities of any other Data Fiduciaries or Processors with whom we have shared it.
- **Correction and erasure.** Have your personal data corrected, completed, or updated, and erased where it is no longer necessary for the purpose or where you withdraw consent, unless retention is required by law.

- **Grievance redressal.** Have your grievances addressed by us in the first instance before approaching the Data Protection Board of India.
- **Nomination.** Nominate another individual to exercise your rights in the event of your death or incapacity.

### **Grievance Officer and the Data Protection Board**

---

You may contact us at [people@cainc.com](mailto:people@cainc.com) with any questions or complaints about how we handle your personal data. We will respond within the period prescribed under the DPDP Rules. If your grievance is not resolved, you may lodge a complaint with the Data Protection Board of India.

### **Recipients, processors, and cross-border transfers**

---

We share your personal data with our talent acquisition platform provider (Eightfold) and other recruiting, hosting, and security providers acting as Data Processors on our behalf, each bound to protect it. As Eightfold and certain providers are located outside India, your personal data may be transferred abroad. Under the DPDP Act, cross-border transfers are generally permitted except to countries or entities that the Central Government may restrict by notification; we monitor any such restrictions and maintain appropriate contractual protections with overseas recipients. 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 retain your application data only as long as necessary for the purposes above and to meet legal obligations, after which it is deleted. Your data is stored securely within the platform and accessible only to authorized CA personnel involved in hiring. We maintain reasonable security safeguards and will notify the Data Protection Board and affected Data Principals of a personal data breach as required.

### **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 us at [people@cainc.com](mailto: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 and, where required by the DPDP Act, seek updated consent.

### **Contact us**

---

For any privacy questions or requests, contact us at [people@cainc.com](mailto:people@cainc.com).