

Applicant Data Privacy Notice

Effective Date: 07/28/2026

United States

Curriculum Associates, LLC (“Curriculum Associates,” “CA,” “we,” “us”) provides this notice to all job applicants to be transparent about how we collect and use your information during recruiting. This notice is required for California applicants under the California Consumer Privacy Act, as amended (the “CCPA”). Consistent with our commitment to transparency, we provide it to all U.S. applicants, not only those in California.

We use Eightfold, an AI-supported talent acquisition platform, to help our recruiters evaluate applications more consistently. This notice should be read together with our AI-Use Notice and Consent Form, which describes that platform in detail and is presented to applicants during the application process.

To exercise privacy, AI/ADMT, EEO, or accommodation rights, contact people@cainc.com, call (800) 225-0248.

This notice applies to information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household (“personal information”). Personal information does not include publicly available information or information otherwise excluded from the CCPA’s scope.

Automated and AI-Assisted Processing in Recruiting

We use the Eightfold platform to analyze your resume, application materials, and profile against the requirements of open roles, and to categorize your profile (for example, as a “potential strong match” or “potential good match”) to support our recruiters’ review. The platform does not make automated decisions and does not autonomously reject, advance, or select any applicant. The platform does not display a numerical score. A human recruiter reviews applications and makes all hiring decisions, using the platform’s output as one input among many.

Match categorizations such as “potential strong match” or “potential good match” reflect the platform’s informational assessment of alignment with job-related qualifications requested by our recruiters. These categorizations are informational only and are not determinative; recruiters may and do consider additional factors. Upon request, we will provide a general description of how the platform was used in relation to your application, including the categories of inputs considered and whether your profile was categorized.

Where our use of the platform constitutes automated decision-making technology (ADMT) used for a significant decision about you under the CCPA or other applicable law, you have the right to receive a pre-use notice, to access information about how the technology was used with respect to you, and to opt out of that use. To exercise these rights, or to request a human review, contact people@cainc.com, call (800) 225-0248. Choosing not to have your application processed by AI will not affect your eligibility for the role.

An independent bias audit of the Eightfold platform has been conducted within the prior year; a summary of the results and the tool’s distribution metrics is available at <https://eightfold.ai/trust/bias-audit-results/>. Eightfold updates this information at least annually.

Equal Employment Opportunity

We are an Equal Employment Opportunity/Affirmative Action employer. All qualified applicants receive consideration without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, disability, protected veteran status, or any other status protected by law, including Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), and the Age Discrimination in

Employment Act (ADEA). Protected characteristics are not displayed within the Eightfold platform and are not used as screening criteria.

If you need reasonable accommodation at any stage of the recruiting process, contact people@cainc.com or call (800) 225-0248. We will not make any adverse hiring decision because you exercised your privacy rights, requested a human review, or requested accommodation.

Your Rights

Right to know. You may request, up to twice in any 12-month period, the categories and specific pieces of personal information we hold about you, the categories of sources, our purposes for collecting it, and the categories of third parties with whom we shared it. Submit requests via people@cainc.com, (800) 225-0248.

Right to correct. You may request that we correct inaccurate personal information, taking into account its nature and the purposes of processing. You can update much of your information by logging in to your candidate profile in Eightfold.

Right to delete. You may request that we delete the personal information we collected about you. Delete your Eightfold candidate profile in candidate settings or request deletion by contacting people@cainc.com or (800) 225-0248. Subject to legal obligations, we will complete deletion or de-identification within 30 days and confirm completion. We may retain information where required for legal compliance or other permitted business purposes, such as EEO recordkeeping.

Right to opt out of sale or sharing. We do not sell your personal information and do not share it for cross-context behavioral advertising. California law requires us to tell you that you may opt out should we ever engage in such activity. We have not sold or shared your personal information in the prior 12 months.

Right to limit use of sensitive personal information. We use sensitive personal information only for the purposes permitted under the CCPA and do not use or disclose it to infer characteristics about you or to make automated hiring decisions.

Right to non-discrimination. We will not make any adverse hiring decision because you exercised your privacy rights or requested accommodation.

Your Rights Regarding Automated Decision-Making. Depending on where you reside, you may have additional rights with respect to our use of the Eightfold platform, including: (1) the right to receive a pre-use notice; (2) the right to receive an individualized notice after an adverse outcome; (3) the right to correct factually incorrect or materially inaccurate personal data used in the decision-making process; (4) the right to seek meaningful human review and reconsideration of an adverse decision, to the extent commercially reasonable; (5) the right to access information about how the technology was used with respect to you; and (6) the right to opt out and request an alternative process. To exercise any of these rights, contact us through the channels described in this Applicant Data Privacy Notice.

Information We Collect

We collect, and may have collected in the prior 12 months, the following categories of personal information:

- **Identifiers.** Name, postal address, phone number, email, and similar contact details.
- **Customer-records information.** Name, signature, employment history, identification details, and financial information where relevant to the role.
- **Protected classification characteristics.** Age, race, marital status, or veteran status, where provided by you for compliance or process-improvement purposes only; stored separately and not used in selection workflows.

- **Internet or other network activity.** Prior application submissions and recruiting communications logged in our applicant-tracking and recruiting systems.
- **Professional or employment-related information.** Title or position and work history.
- **Non-public education information.** Transcripts or proof of degree, where requested for certain roles.
- **Sensitive personal information.** Government identification numbers, including a Social Security number, to verify qualifications and U.S. work eligibility; and race or ethnic origin, to administer and improve our hiring process and for EEO compliance. We do not use sensitive personal information to infer characteristics about you or in selection workflows.

Sources of Personal Information

We process information you provide (resume, cover letter, application form responses, and profile data) and publicly available professional information (e.g., LinkedIn). We may also receive information from third parties to whom you provided it, such as job boards, recruiting agencies, or references. We only process your personal information using the Eightfold platform if it was provided by you and after you received the AI-use Notice and Consent Form.

Purposes for Collection

We use your personal information to:

- administer and improve our hiring process, including the AI-assisted evaluation described above;
- verify your qualifications and U.S. work eligibility;
- advance or defend CA's legal rights;
- comply with applicable laws, including EEO recordkeeping obligations;
- conduct internal reporting, performance, and benchmarking, including reporting to our investors; and
- as otherwise described to you at data collection.

We will not collect additional categories, or use your information for materially different, unrelated, or incompatible purposes, without notice.

Third Parties and Service Providers

We share personal information with service providers only as necessary to operate recruiting, hosting, security, database, and talent acquisition services. We require service providers by contract to protect your information, use it only on our behalf, and to refrain from using your personal information for their own model training or any purpose unrelated to their contracted services. We do not sell your personal information, use it for advertising, or share it with third parties for purposes unrelated to the hiring process.

Your personal information is not used to train AI models. Eightfold may use data that has been de-identified and aggregated, so that it cannot reasonably be linked to you, to improve the performance, accuracy, and fairness of its talent acquisition tools. Service providers and sub processors are contractually prohibited from using your personal information for their own model training.

Retention and Security

Your resume, application materials, profile data, and related information are stored securely within the platform. Access is restricted by role-based permissions and logged for security monitoring. Authorized personnel receive training on privacy, security, and fair hiring, and data is protected in transit and at rest. Only authorized CA personnel involved in hiring may access your personal information.

We retain candidate data for four (4) years from the date you submit your application, in accordance with our candidate records retention policy and applicable state and federal law, unless you request earlier deletion or a different period is required by law. Where legal obligations require retention (e.g., EEO recordkeeping), we retain only what is necessary and restrict use to compliance purposes.

Inquiry, Review, and Appeal

If you were not selected and have questions about how your application was evaluated, including the role of the Eightfold platform, contact people@cainc.com, call (800) 225-0248. We will provide a general explanation of the factors and criteria applied during review and the platform's role. We will provide a specific post-adverse-outcome notice where required by applicable law.

Changes to This Notice

We review this notice at least every 12 months and update it as needed to reflect legal changes. Where required by law, we will provide additional notice or seek updated consent before material changes take effect.

Contact Us

To exercise any right described in this notice, including privacy, AI or ADMT, EEO, accommodation, or inquiry/appeal rights, please contact people@cainc.com, or call (800) 225-0248. We may verify your identity depending on the nature of the request. We aim to respond within 45 days; if we need more time, we will notify you and may take up to 90 days overall. We are not able to respond to more than two "right to know" requests from a person in a 12-month period.