

# Curriculum Associates®

## Applicant Data Privacy Notice

**Effective Date:** January 1, 2023.

Curriculum Associates, LLC is providing this notice to all job applicants to provide more transparency about our data collection and usage practices. This notice is required to be provided in connection with the California Privacy Rights Act (CPRA). However, consistent with our organization's emphasis on transparency, we are providing this notice to all applicants for employment, not just those in California that are impacted by the CPRA.

This notice applies to information that identifies, relates to, describes, is 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 and certain other information that is regulated by other applicable laws.

### Your Rights.

#### ***Right to Know***

You have the right to request that Curriculum Associates provide you with information about our collection and disclosure of your personal information during the prior twelve months. Upon our receipt of your verified request, we will provide you with the following:

- The categories of personal information we have collected about you;
- The categories of sources of this personal information;
- Our purpose for collecting your personal information;
- The categories of third parties with whom we have shared your personal information, and;
- The specific pieces of personal information we have collected about you.

#### ***Right to Opt-Out***

*We do not sell your personal information.* However, we are required by statute to let you know that you have the right to opt-out of the sale of your personal information if we ever engage in such activity. California law requires us to notify you that we have not sold your personal information in the prior twelve months. We do not share your sensitive personal information for the purpose of inferring characteristics about you.

### ***Right to Correct***

You have the right to request that we correct inaccurate personal information, taking into account the nature of the personal information and the purposes for CA's processing of that information. To do so, please contact us at [privacy@cainc.com](mailto:privacy@cainc.com) or (800) 225-0248.

### ***Right to Delete***

You have the right at any time to request that we delete your personal information collected during the preceding twelve-month period. To make that request, please contact us at [privacy@cainc.com](mailto:privacy@cainc.com) or (800) 225-0248. Please note that we may not be able to delete all or some of your personal information if we require it for certain business purposes or to comply with certain laws.

### ***Right to Non-Discrimination***

We will not make any adverse hiring decisions based on your exercise of your rights under the CPRA.

## **Information We Collect.**

*We collect, and may have collected in the past twelve (12) months, the following categories of personal information:*

- **Identifiers** (e.g., name, address, phone number, email, and other contact details).
- **Personal Information described in Cal. Civ. Code § 1798.80(e)** (e.g., name, signature, employment history, identification details, financial information).
- **Protected classification characteristics under California or federal law** (e.g., age, race, marital status, veteran status, if provided by the applicant).
- **Internet and other network activity information** (e.g., prior application submissions, communications logged in Jobvite)
- **Professional or employment-related information** (we collect information such as title/position and work history).
- **Non-public education information** (college transcripts or proof of degree may be requested during hiring process for certain roles).
- **Sensitive Personal Information as defined by the CPRA**, including:
  - o **Government ID.** We receive your personal identification numbers, including social security number or other identification numbers in order to administer and improve our hiring process, including verifying your qualifications and eligibility to work in the United States.
  - o **Race or Ethnic Origin.** We collect this information to administer and improve our hiring process.

As noted above, we do not share your sensitive personal information for the purpose of inferring characteristics about employees.

*Our sources for the above categories of personal information:*

- We receive this information directly from you or from third parties to whom you have provided such information.

*Our business purposes for collecting the above categories of personal information:*

- To administer and improve our hiring process, including verifying your qualifications and eligibility to work in the United States;
- To advance or defend CA's legal rights;
- In connection with our compliance with applicable laws;
- For internal reporting on performance and benchmarking purposes, including reporting to our investors;
- As described to you when collecting your personal information and/or to fulfill or meet the reason for which the information is provided.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

We have engaged in the prior twelve months, and will continue to engage, certain trusted third parties to perform functions and provide services to us, including business communication and collaboration tools (e.g., our third-party recruiting platform), hosting and maintenance, error monitoring, debugging, security and performance monitoring, database storage and management, or other services. We may share your personally identifiable information with these third parties, but only to the extent necessary to perform these functions and provide such services. We also require these third parties to maintain the privacy and security of the personally identifiable information they process on our behalf.

## **Retention of Information.**

We will retain your personal information only as long as is reasonably necessary for the operation of our business and as otherwise required for legal compliance purposes.

## **Policy Review.**

We review this notice and privacy policy at least once every twelve months, and we will make updates from time to time, for example, to reflect changes in legal requirements and to provide more clarity to employees on our practices. Those updates will be provided to applicants by posting an updated version of this notice and policy within our job-application platform.

## Contact Information

To submit a request to exercise any of your rights, please submit your request to [privacy@cainc.com](mailto:privacy@cainc.com) or (800) 225-0248. We will evaluate the request and take action where required to do so.

Depending on the nature of your request, we may have to verify your identity when you contact us.

We endeavor to respond to your request as soon as we can. If we are not able to respond to your request within forty-five days, we will let you know that we may require additional time (up to ninety days overall).

We are not able to respond to more than two “Right to Know” requests from a given person in any twelve-month period.