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Issued by Job&Talent as Deployer of CLARA for its Clara for Staffing recruitment processes. Job&Talent is the data controller for this processing. This notice covers solely the use of CLARA and supports the controller's transparency obligations under Articles 13 and 14 GDPR. This document does not constitute legal advice.

Candidate Transparency Notice

1. Purpose of this Document

This document explains how artificial intelligence (AI) is used in the recruitment process for this role, how we process your personal data, and what rights you have. You are not required to participate in the AI interview. If you prefer to speak with a human recruiter instead, please use the "Speak to a human instead" option on the interview invitation page.

2. Who is Responsible for Your Data

The data controller responsible for the processing of your personal data in connection with this recruitment process is the employer (the "**Deployer**") that posted the job offer for which you are applying.

If you have any questions or complaints regarding data protection that you would like to address to our Privacy team, you can do so at the following email address: Full details of how Job&Talent processes personal data are in our Privacy Notice: https://www.jobandtalent.com/legal/privacy-notice.

3. What Is CLARA and How It Is Used in Your Application

CLARA is an AI-powered recruitment system developed and operated by Job&Talent. It is used to support employers in the early stages of the hiring process. In your application, CLARA may be used for one or more of the following:

- Automated CV screening: CLARA reviews your submitted CV and application materials against the requirements of the role. It extracts relevant information (education, experience, skills) and produces an initial suitability score.
- AI-conducted preliminary interview: CLARA may conduct a structured telephone interview with you. During the call, CLARA will ask you a set of predefined questions

relevant to the role and record your answers (with your prior consent). It will then analyse the content of your responses and generate a suitability assessment.

CLARA is a decision-support tool. It does not make hiring decisions. All outputs produced by CLARA — including scores, rankings, and assessments — are reviewed by a qualified human recruiter before any decision affecting your candidacy is made.

4. How You Can Opt Out of AI Processing

You may opt out of the AI-conducted interview at three distinct points in the process:

1. **Before the interview begins (on the application page):** When you access the job application link, you will see a dedicated option labelled "Request human assistance" or "Speak to a human instead". Selecting this option means a human recruiter will contact you directly. This mechanism also serves candidates who require an accessibility accommodation (e.g. hearing impairment). Choosing this option will not negatively affect your candidacy.
2. **At the start of the AI call:** If you receive a call from CLARA, the system will begin with the following mandatory disclosure: "As part of our recruitment process, this interview is conducted using automated systems and will be recorded and analysed to help our hiring team evaluate applications. No final hiring decision is made solely by automated means — your application will be reviewed by a human recruiter. If you prefer not to participate in this automated interview, you may choose to withdraw your application at this stage. Would you like to continue?" If you decline, the call ends and your application is flagged for human follow-up.
3. **At any point during the AI call:** If at any moment during the interview you express a preference to speak with a human recruiter, CLARA will end the call and your application will be classified for manual human review. This preference can be expressed verbally at any time.
4. **After the AI call:** you can still ask for a human review at any later stage. If, once the interview is over, you would prefer a human to review your application — or you no longer want the automated assessment to be relied upon — contact us at dpo@jobandtalent.com and a human recruiter will take over. Choosing this option will not negatively affect your candidacy.

5. Personal Data Processed

The following categories of personal data may be processed in connection with your use of CLARA:

- **Contact details:** name, email address, phone number

- **Application data:** CV, cover letter, education and employment history, suitability scores, explanatory summaries, LinkedIn profile
- **Interview content:** voice recording, transcript of your spoken responses

6. How the AI Assessment Works

CLARA applies a structured, transparent and auditable scoring methodology:

- Interview script generation: Before your interview, CLARA analyses the job description to extract relevant requirements and competencies, and builds a set of interview questions. This extraction is validated by a human recruiter before the interview is conducted.
- Interview and transcription: Your spoken responses are transcribed. CLARA processes only the literal linguistic content of your answers — it does not analyse your voice, tone, pitch, or any other acoustic or biometric characteristics.
- Post-interview scoring: CLARA compares your responses against predefined confidence intervals for each question and assigns a numerical score (1–100) per question. Scores are aggregated using fixed weights across requirements, skills, and competences.
- Output: CLARA produces a report including a numerical score, a qualitative classification (Strong Fit / Viable Fit / Weak Fit), and an explanatory summary highlighting strengths and gaps.

Human oversight guarantee: All AI-generated outputs are treated as preliminary and indicative only. A qualified human recruiter reviews CLARA's recommendations before any decision is made regarding your candidacy. You will never be rejected or advanced solely on the basis of an automated output.

In practice, human review occurs as follows: (a) All candidates who opt out of the AI interview (at any of the three stages described above in Section 4) are flagged in the recruiter dashboard as requiring manual follow-up; a human recruiter will contact them to arrange an alternative interview. (b) For candidates who complete the AI interview, CLARA's outputs — including scores, classifications, and qualitative summaries — are presented to a human recruiter in the ATS dashboard. The recruiter reviews the full report before making any decision to advance or reject a candidacy and is allowed to add comments to correct Clara's output via textbox. © No candidate will be rejected or advanced solely on the basis of an automated score. Human override of any CLARA output is always available and logged in the audit trail.

Automated decision making: We do not process your personal data within the scope of exclusively automated processing for the purpose of making decisions which have direct legal

effect on you without human intervention or which significantly affect you in a similar way. As flagged before, all AI-generated outputs will count with a human recruiter supervision.

7. Data Transfers and Sub-processors

In providing the CLARA system, the Deployer uses different third-parties in order to make the processing activity possible. These include:

- AI provider to conduct interviews for job applications, specifically through CLARA. This provider counts with AI language model and telephony and voice platform providers.

In order to carry out data processing activities, the Deployer or its processors may transfer data outside the European Union. In such cases, transfers are made to countries deemed adequate by the European Commission, or the Standard Contractual Clauses are signed.

8. How Long Your Data Is Kept

Your personal data is retained for the duration of the recruitment process and for a period thereafter for the purposes of:

- Comply with our purpose: current and future recruitment process, and recruitment process.
- Defend on potential recruitment-related claims.
- Comply with legal obligations

9. Your Rights

You have the following rights in relation to the processing of your personal data and the use of AI in this recruitment process:

Right	What does it consist of?
Right of access by the data subject (Art. 15 GDPR)	Check which personal data the Deployer processes.
Right to rectification (Art. 16 GDPR)	Modify personal data processed by the Deployer when they are inaccurate.

Right to erasure (Art. 17 GDPR)	Request that the Deployer removes your personal data.
Right to restriction of processing (Art. 18 GDPR)	Request that the Deployer limits the processing of your personal data.
Right to data portability (Art. 20 GDPR)	Request that the Deployer provides you with information about yourself in a computer format.
Right to object (Art. 21 GDPR)	Request that the Deployer does not process your personal data for some specific purposes.
Right to lodge a complaint with a supervisory authority (Art. 77 GDPR)	If you consider that the processing of your personal data infringes the GDPR, you may lodge a complaint, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement. You may also lodge a complaint with your local supervisory authority. In Spain, this is the Agencia Española de Protección de Datos (AEPD): www.aepd.es.

To exercise any of the rights described above, or for questions about how your data is processed in this recruitment process, please contact the Deployer, by sending an email to dpo@jobandtalent.com. See also our Privacy Notice: https://www.jobandtalent.com/legal/privacy-notice

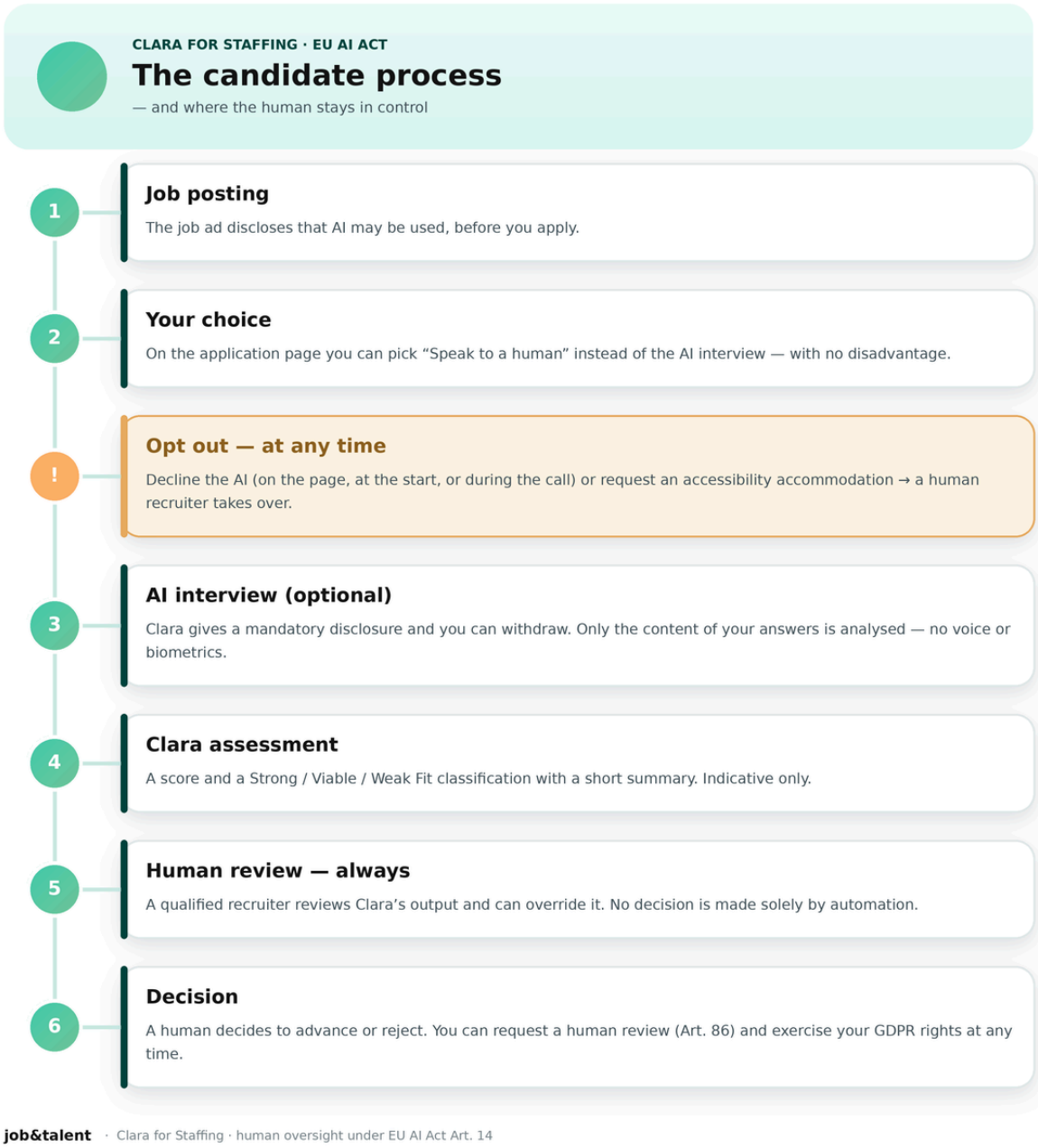
10. Accessibility and Alternative Interview Formats

CLARA is designed to be inclusive. Candidates who are unable to participate in a voice-based AI interview due to a disability or accessibility need (including, but not limited to, hearing impairment) are entitled to request an alternative format at no disadvantage to their candidacy.

A candidate with a hearing impairment who cannot participate in a telephone interview may request a human recruiter via the "Request human assistance" mechanism on the application website page (the opt-out path shown in the process flow below). Where available, the process also supports communication via WhatsApp or written channels. The Deployer is

responsible for ensuring that alternative contact methods are available and communicated in the job posting.

Figure 1: The candidate process at a glance — from the AI disclosure on the job posting, through the opt-out path to a human recruiter, to the mandatory human review of every CLARA output before any decision affecting your candidacy.



During the AI phone call, CLARA opens with a mandatory disclosure that informs the candidate of automated processing and explicitly offers the option to withdraw and be contacted by a

human recruiter instead. This disclosure is read at the very start of the call, before any interview questions are asked, ensuring compliance with Art. 50(1) EU AI Act.

In the Recruiter ATS view — candidates who have requested human assistance appear in the pipeline flagged as "*Solicitado por un humano*" (Requested by a human). The recruiter can see this status and take action before any AI scoring is applied to that candidate.

Issued by Job&Talent as Deployer of CLARA. Legal Operations reviews this notice to ensure it accurately reflects the specific data processing activities, lawful bases, retention periods and contact details before it is issued to candidates. This document does not constitute legal advice.

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