

Shift Technology

AI in Recruitment Notice

How we use artificial intelligence in our hiring process — and your rights as a candidate

In short: We use AI tools to help our recruiters review and shortlist applications. AI does not make the decision to hire — a human always does. You can ask for a human-only review, request information about how AI was used in your application, or apply through an alternative process. This notice explains the detail.

1 About this notice

Shift Technology SAS (“Shift”, “we”, “us”) uses some artificial-intelligence (AI) tools to help us manage applications and shortlist candidates for roles. We are required by law in several jurisdictions to be clear and specific about that use. This notice tells you what AI we use, how it works, what data it considers, how a human is involved, and what choices and rights you have.

This notice applies to anyone who applies for a job at Shift, anywhere in the world. Region-specific additions for the European Union and the European Economic Area, the United Kingdom, New York City, Illinois, Colorado, California, and other US states are in Section 6. If you live or are applying from a location not specifically listed, the general parts of this notice (Sections 2 to 5) apply to you in any event.

If something in this notice is unclear, or if you want to exercise any of the rights described, please contact us at the address in the meta strip above and we will respond within the time required by the law applicable to your application — and in any case as quickly as we reasonably can.

2 What AI we use in recruitment

Our recruitment process is run primarily by our People Team and the hiring managers for each role. We use AI tools embedded in our Applicant Tracking System (ATS) and a small number of related tools to help that team work efficiently. The AI tools we use, and what they do, are:

Tool / function	What the AI does	Effect on your application
CV / résumé parsing	Reads the text of your application materials and extracts structured information (e.g. employers, dates, job titles, skills, qualifications) into our ATS.	Convenience step. Does not change your candidacy on its own. If a parsing error misreads your background, a human recruiter still sees the original document.
Candidate ranking and matching	Compares the structured information from your application to the requirements of the specific role you applied for and produces a relevance score and shortlist.	Influences the order in which applications are reviewed by our recruiters and which applications are prioritised for first contact. A human recruiter reviews shortlisted applications and may also review

Tool / function	What the AI does	Effect on your application
		applications that fell outside the shortlist.
Hard-requirement filtering	Checks for objective hard requirements stated in the job description — for example, eligibility to work in the country where the role is based, or a required professional licence — and may exclude applications that do not meet them.	If you are filtered out for a hard requirement and you believe the filter is wrong (for example, because the requirement does not actually apply to you), you can ask us to review the decision manually — see Section 5.
Outreach and scheduling automation	Generates draft outreach messages, schedules interviews, and sends confirmation and status updates.	Helps us communicate consistently. A human recruiter approves outbound messages on outreach for active applications. Status update emails may be sent automatically.

What we do NOT use: We do not use AI to analyse video or audio recordings of interviews. We do not use facial recognition, emotion recognition, voice biometrics, or any biometric identification at any stage of recruitment. We do not use AI to make the final decision to hire or to reject a candidate after the interview stage — those decisions are made by humans. We do not use AI to evaluate your social media presence or to scrape data about you from outside the application you give us.

3 Data the AI uses about you

The AI tools described above use only the information you give us as part of your application and, where applicable, publicly available information from the channel through which you applied (for example, your LinkedIn profile if you applied via LinkedIn). Specifically, the AI tools use:

- Information you submit in your CV / résumé, cover letter, and application form (employment history, education, qualifications, skills, languages, location, salary expectations).
- Information you provide about your eligibility to work in the country where the role is based.
- Public profile information from the application channel you used (for example, the structured profile fields visible on a LinkedIn application).
- The criteria of the specific job description you applied for, used to compare against your application.
- Application metadata such as timestamps, the source through which you applied, and the role you applied for.

We do not use: The AI tools do not use information about protected characteristics — race, ethnicity, religion, sexual orientation, gender identity, age (other than where a minimum age is a legal requirement for the role), disability, pregnancy, or trade union membership — to evaluate or score your application. Where we ask for some of this information separately (for example, for voluntary diversity monitoring), it is held separately from the application, is voluntary, and is not used in any AI scoring.

If you have applied to more than one role at Shift, your application data may be considered for those roles. We retain application data for the period set out in our general Candidate Privacy Notice, which is referenced in Section 8 of this document.

4 Human involvement

The substantive decisions about your application — whether to interview you, whether to make you an offer, what offer to make — are made by humans. AI is used to support those humans, not to replace them. In practice:

- A human recruiter from the Shift People Team reviews every shortlisted application before any decision to contact or to decline a candidate is taken.
- A human hiring manager and at least one further interviewer evaluate any candidate who proceeds beyond initial screening.
- The decision to make an offer of employment is taken by a hiring manager with sign-off from a senior leader and the People Team. AI plays no role in that decision.
- If an application is excluded by a hard-requirement filter (see Section 2), you may request a human review and a recruiter will look at the underlying application and the reason for the filter.
- If you believe AI has affected your application in a way you wish to challenge, you may at any point ask for a human review or for an alternative selection process — see Section 5.

5 Your rights and choices

Regardless of where you live, you may exercise the following rights and choices at any time during a live application. Some additional rights specific to your location are described in Section 6.

5.1 Request a human-only review

You can ask us to take a fresh look at your application without the AI tools described in Section 2 affecting the outcome. A recruiter will review your application materials manually and confirm the outcome in writing. To request a human-only review, email recruiting@shift-technology.com with the subject line “Human review request — [role name]”. We will acknowledge within five business days.

5.2 Request an alternative selection process

Where the law in your location requires it, or where you simply prefer it, you can ask for an alternative selection process that does not use the AI tools described in Section 2. We will offer a reasonable alternative — typically a manual application review by a recruiter and standard interview process. Use the same contact address as above with the subject line “Alternative process request — [role name]”.

5.3 Request information about how AI was used in your application

You can ask us for a plain-language explanation of how the AI tools considered your application — what data we used, what the AI assessed, and (in summary) what factors contributed to the outcome. We will not share confidential vendor algorithms or trade-secret information, but we will give you enough to understand the role AI played in your case.

5.4 Withdraw at any time

You can withdraw your application at any time. If you do, we will stop processing your application materials for the live role. We may retain limited application records for legal and audit purposes; the period is set out in our Candidate Privacy Notice.

5.5 Complaints

If you are not satisfied with how we have used AI in your application or how we have handled your request, you can raise a complaint with our Data Protection Officer at dpo@shift-technology.com. Depending on your location, you may also have the right to complain to a regulator — see Section 6 for the relevant authority.

Regional additions *Where you are, and what your local rules add to the above*

The general rights and choices in Sections 2 to 5 apply to everyone. The following regional sections add specific requirements that apply on top of the general notice. If two regional rules could apply to your application, the more candidate-protective applies.

6.1 European Union and European Economic Area

If you are applying from, or for a role based in, an EU or EEA member state (including France, where Shift Technology SAS is established), the following rights apply under the EU AI Act and the General Data Protection Regulation.

- Status under the EU AI Act: The candidate ranking and matching function described in Section 2 is a high-risk AI system under Annex III, point 4 of the EU AI Act (AI used in recruitment for filtering applications and evaluating candidates). Shift acts as the deployer of that system within its own recruitment activity.
- Information under Art. 26(10) of the EU AI Act: This notice serves as the information that you are subject to a high-risk AI system in our recruitment process. The “main parameters” the AI considers are the role-

fit criteria of the job description applied to the structured information extracted from your application; the categories of personal data used are listed in Section 3.

- Right under GDPR Article 22: You have the right not to be subject to a decision based solely on automated processing, including profiling, that produces legal effects or similarly significantly affects you. Shift's process is not solely automated — a human always reviews shortlisted applications — but you can in any event request a human-only review under Section 5.1.
- Right under GDPR Articles 13 and 15: You have a right to meaningful information about the logic involved in any automated decision-making, as well as the significance and the envisaged consequences. Section 2 and Section 3 of this notice provide that information at a general level; Section 5.3 explains how to request information specific to your application.
- Supervisory authority: Our lead supervisory authority is the Commission nationale de l'informatique et des libertés (CNIL) in France. You may also lodge a complaint with the supervisory authority of your habitual residence or place of work.
- Workers' representatives: Where the law of an EU member state requires consultation with workers' representatives before the deployment of AI tools in recruitment, that consultation has been carried out where required.

6.2 United Kingdom

If you are applying for a role based in the United Kingdom, the UK General Data Protection Regulation and the Data Protection Act 2018 apply. The rights described under EU GDPR in 6.1 above apply in equivalent form under UK GDPR, including the right of meaningful information about automated decision-making logic and the safeguards in section 14 of the Data Protection Act 2018. The relevant supervisory authority is the Information Commissioner's Office (ICO).

6.3 New York City

If you are applying for a role based in New York City, or that may be performed from New York City, the New York City Automated Employment Decision Tool law (Local Law 144 of 2021) applies.

- Definition: Our candidate ranking and matching tool is an “automated employment decision tool” (AEDT) within the meaning of Local Law 144. This notice constitutes the candidate notice required by the law, provided at least ten business days before the AEDT is used in respect of your application.
- Bias audit: An independent bias audit of the AEDT used in our recruitment process is conducted annually. The most recent bias audit summary, including the date of the audit and the auditor's name, is published on our careers website at [careers.shift-technology.com/ai-recruitment-notice/bias-audit]. The next scheduled audit date is also published there.
- Data sources and categories: The AEDT uses the categories of data set out in Section 3 of this notice. The data source is the application you submit to us and (where applicable) the structured profile you applied through.
- Alternative selection process: You may request that we evaluate your application without the use of the AEDT. Use the address in Section 5.2 with the subject line “Alternative process request — NYC”. We will confirm receipt within five business days and offer an alternative process at no detriment to your candidacy.
- Accommodation: If you require a reasonable accommodation in connection with the use of an AEDT in your application, please email recruiting@shift-technology.com with the subject line “AEDT accommodation”.

6.4 Illinois

If you are applying for a role based in Illinois, the Illinois Artificial Intelligence Video Interview Act (820 ILCS 42/) and the Illinois Human Rights Act provisions on AI in employment apply. As explained in Section 2, Shift does not use AI to analyse video or audio of interviews; the Illinois AI Video Interview Act consent obligation therefore does not apply to your interview process. The general candidate-protective rights in Sections 4 and 5 — including your right to a human-only review — remain available.

6.5 Maryland

If you are applying for a role based in Maryland, the Maryland prohibition on the use of facial recognition technology during a job interview (Md. Lab. & Empl. § 3-717) applies. As explained in Section 2, Shift does not use facial recognition technology at any stage of recruitment.

6.6 Colorado

If you are applying for a role based in Colorado, the Colorado AI Act (SB 24-205), in force from 1 February 2026, applies. Employment decisions assisted by AI are “consequential decisions” under that Act. This notice serves as the disclosure that an AI system is being used in your recruitment. You have the right to be informed of the principal factors used and to appeal an adverse consequential decision through the alternative process described in Section 5.2. The Colorado Attorney General is the enforcement authority.

6.7 California

If you are applying for a role based in California or applying as a California resident, the California Consumer Privacy Act, as amended by the California Privacy Rights Act, applies. You have the right to be informed about the categories of personal information collected and the purposes for which they are used (Section 3 covers this), to access your personal information, to request correction, and to delete information, subject to the exceptions in California law. Where the California Privacy Protection Agency's automated decision-making regulations apply to your application, you also have the right to opt out of certain automated decision-making and to obtain information about how an automated decision was made — the rights in Section 5 implement those protections.

6.8 Other jurisdictions

If you are applying from a location not specifically listed above, Sections 2 to 5 of this notice still apply to your application. Where local law in your jurisdiction requires additional disclosures, consents, or processes — such as for biometric data, video interview analysis, or automated decision-making — we comply with those laws and adapt our process accordingly. If you would like to know the position in your specific jurisdiction, please contact us at recruiting@shift-technology.com.

7 Bias audit and oversight

The AI tools described in this notice are subject to ongoing oversight inside Shift and to independent review.

- We conduct an annual independent bias audit of the candidate ranking and matching tool. The audit considers selection rates across protected categories and the data source quality. The most recent bias audit summary is available by contacting dpo@shift-technology.com.
- We carry out a Data Protection Impact Assessment for any material change to the AI tools used in recruitment, reviewed by our Data Protection Officer.

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- We perform vendor due diligence on the providers of the AI tools we use, including assessment of their model documentation, bias-testing approach, and security posture. We monitor outcomes from the AI tools on an ongoing basis and adjust or stop using a tool if we identify a material issue .
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- **8 Contact, updates and related notices**

8.1 How to contact us

- Recruiting questions, or to exercise any right described in this notice: recruiting@shift-technology.com.
- Data protection questions or complaints: dpo@shift-technology.com.
- Postal address: [Shift Technology SAS registered office address].

8.2 Updates to this notice

We update this notice when our recruitment AI tools change in a material way, when bias audit results are refreshed, or when applicable law changes. The “Last updated” date at the top of this notice reflects the most recent material change. Earlier versions are available on request.

8.3 Related notices

This notice covers our use of AI in recruitment specifically. The general handling of your personal data during the recruitment process is covered in the Shift Technology Candidate Privacy Notice, available at [careers.shift-technology.com/privacy]. Where you become a Shift employee, the Employee Privacy Notice will apply. Where you ask Shift questions through our website or careers chat, our general Website Privacy Notice applies.

A note on legal effect: This notice is intended to satisfy our information and disclosure obligations to candidates under the EU AI Act, the GDPR, UK GDPR, the New York City Automated Employment Decision Tool law, the Colorado AI Act, the California Consumer Privacy Act / CPRA, and analogous laws in other jurisdictions in which we recruit. It is provided in plain language and does not create contractual rights beyond those required by the applicable law. Where a specific local-law requirement adds a more candidate-protective rule than the general body of this notice, the more candidate-protective rule prevails for that candidate.