

ComplianceCore

EU AI Act Article 26 Compliance Platform

PROFESSIONAL REPORT

EU AI Act Compliance Gap Assessment Report

Company:	Recruitly GmbH
Country:	Germany (DE)
Assessment Date:	10 March 2026
Report Tier:	Professional
AI Systems Assessed:	2 (TalentFilter AI, RankIQ)

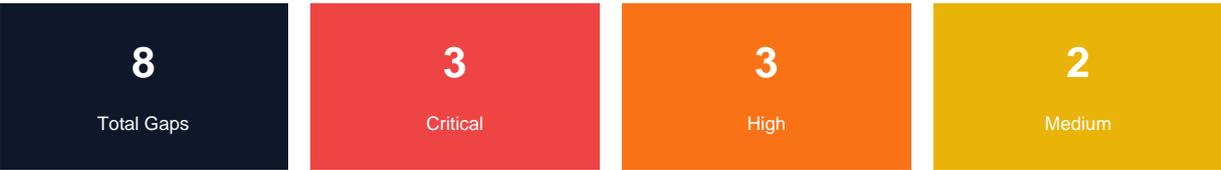
OVERALL RISK LEVEL: HIGH -- Immediate Action Required

This report was generated by ComplianceCore based on information provided during the intake assessment. It is intended to support internal compliance planning and should not be construed as legal advice. For legal advice specific to your organisation, consult a qualified solicitor or law firm.

Executive Summary

Recruitly GmbH deploys two high-risk AI systems under Annex III, Section 4 of the EU AI Act: TalentFilter AI (CV screening and shortlisting) and RankIQ (candidate behavioural scoring and ranking). Both systems process employment-affecting decisions for over 8,000 candidates annually across Germany, Austria, and the Netherlands.

The assessment identified 8 compliance gaps across Articles 9, 10, 13, and 14. Three gaps are rated critical and require immediate remediation before the August 2026 enforcement deadline. Fines for non-compliance with Article 26 obligations can reach up to EUR 15,000,000 or 3% of global annual turnover.



Key Findings Summary

Article	Severity	Gap Description
Art. 9	CRITICAL	No risk management system or documented AI compliance process
Art. 14	CRITICAL	No human oversight or override mechanism documented
Art. 13	CRITICAL	Candidates not notified that AI is used in recruitment
Art. 10	HIGH	No bias detection or testing conducted on training data
Art. 10	HIGH	Data Protection Impact Assessment (DPIA) not completed
Art. 14	HIGH	HR staff training on AI systems incomplete
Art. 9	MEDIUM	No post-deployment monitoring plan exists
Art. 13	MEDIUM	Technical documentation not obtained from AI system vendors

Prioritised Remediation Plan

Actions ordered by priority and estimated effort. Target: all critical and high items complete before August 2026 enforcement deadline.

#	Status	Action	Article	Effort
1	DONE	Register as AI system deployer; assign AI compliance lead	Art. 9	2 days
2	DONE	Update vendor contracts to include EU AI Act obligations	Art. 13	3 days
3	DONE	Create internal AI systems inventory (TalentFilter AI, RankIQ)	Art. 9	2 days
4	DONE	Request technical documentation from RecruitSoft GmbH & HireTech	Art. 13	3 days
5	IN PROGRESS	Draft and publish candidate transparency notice	Art. 13	5 days
6	IN PROGRESS	Implement decision logging for CV screening outcomes	Art. 14	7 days
7	IN PROGRESS	Conduct DPIA for both AI systems; engage DPO and works council	Art. 10	8 days
8	IN PROGRESS	Develop human oversight SOP for all HR staff	Art. 14	4 days
9	TODO	Establish formal risk management framework for AI systems	Art. 9	10 days
10	TODO	Commission independent bias audit of TalentFilter AI	Art. 10	12 days
11	TODO	Establish post-deployment monitoring plan with KPIs	Art. 9	5 days
12	TODO	Deliver AI literacy training programme to all HR staff	Art. 14	6 days

Estimated total effort: 47 person-days

4 done | 4 in progress | 4 not yet started | Target: August 2026