

# ADP.com Web Site Privacy Statement

## Safe Harbor Privacy Statement

Some ADP companies participate in the U.S.-EU and U.S.-Swiss Safe Harbor Privacy Frameworks as set forth by the United States Department of Commerce, including Virtual Edge Corporation and The Right Thing LLC (formerly AIRS/The Right Thing). This means that, for personal information that individuals in the European Economic Area and Switzerland provide to these affiliates for processing on behalf of our clients, we have committed to handling such personal information in accordance with the Safe Harbor Principles. Additionally ADP protects all ADP associate information in accordance with the Safe Harbor Principles, and ADP, Inc. has certified to the U.S.-EU and U.S.-Swiss Safe Harbor Frameworks for human resources data. For more information about the Safe Harbor Principles, please visit the U.S. Department of Commerce's Website <http://www.export.gov/safeharbor/>.

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ADP believes that privacy is important to the success and use of the Internet. This statement sets forth ADP's Privacy Statement for ADP.com and describes the practices that ADP will follow with respect to the privacy of users of this site. From time to time, we may change this Privacy Statement. For example, as we update and improve our service, new features may require modifications to the Privacy Statement. Accordingly, please check back periodically.

### What is personally identifiable information?

"Personally identifiable information" is information about you, such as name, address, e-mail address, user ID, credit card number, social security number, and so on.

### How is information collected, used, and disclosed?

We do not collect personal information -- including your e-mail address -- unless we first ask you for it. On some of our sites, we may request that you voluntarily supply us with information, including your e-mail address, street address, telephone number or other information so that we may enhance your site visit or follow up with you after your visit. Whether you provide any information is entirely up to you.

If you have voluntarily provided information, you consented to the collection and use of your personally identifiable information as described in this Privacy Statement. In some circumstances, ADP may share information you voluntarily provide us with trustworthy business partners. We do not sell or rent personal information collected through this site to anyone. Also, ADP may provide aggregate statistics about visitors to our sites, such as volume, traffic patterns, and related site information to reputable third-party vendors, but these statistics will include no personally identifiable information. ADP may also disclose information in special cases when we have a good faith belief that such action is necessary to: (a) conform to legal requirements or comply with legal process; (b) protect and defend our rights or property; (c) enforce the Web site Terms and Conditions of Use; or (d) act to protect the interests of our users or others.

### What are cookies and how are they used?

Some ADP sites, like many other commercial web sites, may utilize a standard technology called "cookies" to collect information about how our site is used. Cookies were designed to help a web site operator determine that a particular user had visited the site previously and thus save and remember any preferences that may have been set while the user was browsing the site. Cookies are small strings of text that web sites can send to your browser. Cookies cannot retrieve any other data from your hard drive or obtain your e-mail address. If you are simply browsing an ADP informational site, a cookie may be used to identify your browser

as one that has visited the site before.

We may also make use of memory-based cookies in support of authenticating the user of certain ADP web applications. Similarly, if you are a registered user of a site providing service to ADP clients (and have a user ID and password), we may use cookies so that we can provide personalized information based on preferences you have indicated while using the site. Although you have the ability to modify your browser to either accept all cookies, notify you when a cookie is sent, or reject all cookies, it may not be possible to utilize ADP services which require registration if you reject cookies.

#### **What are your choices regarding collection, use, and distribution of your information?**

If you have voluntarily provided information, you consented to the collection and use of your personally identifiable information as described in this Privacy Statement. If, in connection with your use of a particular service, we ask to use your data in a way not described in this Privacy Statement and you do not wish to permit that use, you can choose not to use the particular service.

If you have voluntarily provided personally identifiable information, we may, from time to time, send you mail or e-mail regarding products and services. If you do not want to receive such offers and mailings, you can easily indicate that by checking the appropriate box on the submission form.

#### **How can you correct, access, and update your information?**

You may view and edit your personally identifiable information at any time by contacting us using the link provided on the web site.

#### **How do we protect your information?**

We exercise great care to protect your personally identifiable information. This includes, among other things, using industry standard techniques such as firewalls, encryption, intrusion detection and site monitoring. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personally identifiable information, we cannot ensure or warrant the security of any information you transmit to us or receive from us. This is especially true for information you transmit to us via e-mail. We have no way of protecting that information until it reaches us. Once we receive your transmission, we make our best effort to ensure its security on our servers.

Internally, we will restrict access to your personally identifiable information to employees who need access to the information in order to do their jobs. These employees are limited in number, and are committed to our privacy policies.

We will review our security arrangements from time to time as we deem appropriate.

#### **How can you help protect your information?**

If you are using an ADP web site for which you registered and chose a password, we recommend that you do not divulge your password to anyone. We will never ask you for your password in an unsolicited phone call or in an unsolicited e-mail. Also remember to sign out of the registered site and close your browser window when you have finished your work. This is to ensure that others cannot access your personal information and correspondence if others have access to your computer.

#### **Other sites**

ADP sites may contain links to other sites, including those of our business partners. While we seek to link only to sites that share our high standards and respect for privacy, we are not responsible for the privacy practices employed by other sites.

If you have questions or concerns regarding this statement, you should contact us at [ES\\_Privacy@adp.com](mailto:ES_Privacy@adp.com).