



EFFECTIVE DATE: January 1, 2020  
LAST UPDATED: July 1, 2020

## CALIFORNIA CONSUMER PRIVACY STATEMENT

Pursuant to the California Consumer Privacy Act of 2018 ("CCPA"), ADP, Inc., and any affiliate of ADP Group Companies ("ADP," "we" or "our") are providing the following Privacy Statement to explain how ADP uses and discloses personal information that we collect from individuals who are residents of California, including but not limited to users who visit our websites or consumers who receive services directly from ADP. This Privacy Statement does not apply to personal information pertaining to ADP business contacts or employee of ADP clients. The CCPA defines Personal Information, also known as Personal Data, as categories of information that identify, relate to, describe or are reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to a particular individual or household.

ADP also has a Global Data Privacy Policy that applies to all ADP companies worldwide. An overview of our Privacy Program is located <https://www.adp.com/dataprivacy>.

## CATEGORIES OF PERSONAL DATA COLLECTED & DISCLOSED

ADP may collect and disclose the following categories of Personal Data:

- Category A.** Identifiers, such as name, contact information, online identifiers and Social Security numbers and other government-issued ID numbers;
- Category B.** Personal information, as defined in the California consumer records law, such as name, contact information, insurance policy number, education, employment, employment history financial information, medical information and health information;<sup>1</sup>
- Category C.** Characteristics of protected classifications under California or federal law,<sup>2</sup> such as sex, age, race, religion, national origin, disability, medical conditions and information, citizenship, immigration status and marital status;

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<sup>1</sup> This includes name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.

<sup>2</sup> This include sex (including pregnancy, childbirth, breastfeeding, and related medical conditions), age (40 and over), race, color, religion or creed, ancestry, national origin, disability, medical conditions, genetic information AIDS/HIV status, marital status, sexual orientation, gender identity and expression, citizenship, primary language, immigration status, military/veteran status, political affiliation/activities, domestic violence victim status, and request for leave.

- Category D.** Commercial information, such as transaction information, purchase history and financial details;
- Category E.** Biometric information, such as facial recognition and fingerprints;
- Category F.** Internet or network activity information, such as browsing history and interactions with our website, applications or systems;
- Category G.** Geolocation data, such as device location;
- Category H.** Audio, electronic, visual, and similar information, such as images and audio, video or call recordings created in connection with our business activities;
- Category I.** Professional or employment-related information, such as work history and prior employer, human resources data and data necessary for benefits and related administrative services;
- Category J.** Education information subject to the federal Family Educational Rights and Privacy Act, such as student records; and
- Category K.** Inferences drawn from any of the Personal Information listed above to create a profile or summary above, for example, an individual's preferences, abilities, aptitudes and characteristics.

## PURPOSES FOR THE COLLECTION OF PERSONAL DATA

ADP uses your Personal Data for the following Business Purposes:

**(a) Business Purposes for processing Personal Data pertaining to consumers. Personal Data pertaining to consumers with whom ADP has a business relationship may be processed as needed:**

- (1) To provide the information, product, or service requested by the individual, and as would be reasonably expected by the individual given the context in which the Personal Data was collected, and the information provided in the applicable privacy statement given to the individual (such as for personalization, remembering preferences, or respecting individual rights);
- (2) For due diligence, including verifying the identity of the individual, as well as the eligibility of the individual to receive information, products, or services (such as verifying age, employment, or account status);
- (3) To send transactional communications (such as requests for information, responses to requests for information, orders, confirmations, training materials, and service updates);
- (4) To manage the individual's account, such as for customer service, finance, and dispute resolution purposes;

(5) For risk management and mitigation, including for audit and insurance functions, and as needed to license and protect intellectual property and other assets,

(6) For security management, including monitoring Individuals with access to the website, applications, systems, or facilities, investigation of threats, and as needed for any data security breach notification; and

(7) To anonymize or de-identify the Personal Data.

**(b) Business-necessary processing activities.** ADP may process Personal Data as needed (i) to protect the privacy and security of the Personal Data it maintains, such as in connection with advanced security initiatives and threat detection; (ii) for treasury operations and money movement activities; (iii) for compliance functions, including screening Individuals against sanction lists in connection with anti-money laundering programs; (iv) for business structuring activities, including mergers, acquisitions, and divestitures; and (v) for business activities, management reporting, and analysis.

**(c) Development and improvement of products and/or services.** ADP may process Personal Data to develop and improve its products and/or services, and for research, development, analytics, and business intelligence.

**(d) Relationship management and marketing.** ADP may process Personal Data for relationship management and marketing. This purpose includes sending marketing and promotional communications to individuals who have not objected to receiving such messages, such as product and service marketing communications, investor communications, Client communications (e.g., HR compliance alerts, product updates, and training opportunities and invitations to ADP events), customer satisfaction surveys, supplier communications (e.g., requests for proposals), corporate communications, and ADP news.

**(e) Secondary purposes.** Additionally, ADP uses your Personal Data for secondary purposes such as: (i) disaster recovery and business continuity; (ii) internal audits or investigations; (iii) implementation or verification of business controls; (iv) statistical, historical, or scientific research; (v) dispute resolution; (vi) legal or business counseling; (vii) compliance with laws and company policies; and/or (viii) insurance purposes.

## SOURCES OF PERSONAL DATA

ADP collects this Personal Data actively (e.g. direct input from individual) or passively (e.g. website cookies) from you. Additionally, we may also collect Personal Data from our Clients, business partners and vendors, where applicable.

## DISCLOSURE OF PERSONAL DATA

ADP discloses Personal Data for the following reasons:

### Service Providers/Subcontractors

ADP may share your Personal Data with our subcontractors for certain business purposes. This information is provided in order for them to provide ADP with services such as payment processing, advertising services, marketing partners, web analytics, data processing, IT services, customer support and other services such as for the purpose auditing and fraud investigations. These subcontractors have access to your Personal Data only for the purpose of performing services on our behalf and are expressly obligated not to disclose or use your Personal Data for any other purpose.

### Related Entities

ADP may share Personal Data between and among ADP, its subsidiaries, and affiliated companies for purposes of management and analysis, and other business purposes. For instances, ADP may share your Personal Data with our subsidiaries and affiliated companies to expand and promote our product and service offerings.

### When Required by Law

ADP may be required to disclose your Personal Data to third parties including law enforcement agencies when required to protect and defend our legal rights, protect the safety and security of users of our Services, prevent fraud, respond to legal process, or a request for cooperation by a government entity, as required by law.

### Corporate Transactions

In the event of sale, transfer, merger, reorganization, or similar event ADP may transfer your Personal Data to one or more third parties as part of that transaction with the business entities or people involved in the deal negotiation or transfer.

### With Your Consent

ADP may share Personal Data about you with other third-party companies if you give us permission or direct us to share the information. ADP will share Personal Data with authorized agents that you authorize ADP to communicate to.

## **CALIFORNIA CONSUMER RIGHTS**

If you are a California resident and are engaged in a business relationship directly with ADP as a consumer for the provision of ADP services or products, you may request the following information from ADP.

- (1) **Right to Access** – You may request that we disclose to you the categories of, and specific pieces of Personal Data that we collected about you for the 12-month period preceding your request, including:

- The Categories of Personal Data we collected about you,

- The Categories of Sources from which we collected such Personal Data;
- The Purpose for collecting Personal Data about you; and
- The Categories of third parties with access to your Personal Data if any.

A right to access will also include specific pieces of Personal Data we collected about you. Personal Data that includes social security number, driver's license or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, or security question and answers, or unique biometric data generated from measurements or technical analysis of human characteristics will not be provided, to protect the security of this type of data.

- (2) Right to Request Deletion of your Personal Data – You may request that we delete Personal Data that we have collected from you or maintain about you, subject to certain exceptions under the CCPA (e.g. if we are required by law to retain the information).
- (3) Right to Opt-Out of Sale of Personal Data – We do not sell nor share Personal Data to third parties for direct marketing purposes without consent. ADP does not knowingly sell Personal Data of minor under 16 years of age.
- (4) Right to Non-Discrimination – We will not discriminate against any consumer who has chosen to exercise their rights under the CCPA (i.e. deny you or charge you different prices/rate for products or services, or provide you different level of quality of service).

### **How to submit a California Rights Request**

If this Privacy Statement applies to you, you may make a request for the disclosures described above or make a request to delete Personal Data we collected from you, by contacting us at 1-800-CALL ADP (1-800-225-5237) or [privacy@adp.com](mailto:privacy@adp.com).

Upon receipt of your request we will provide directions on identity verification requirements which may include your name, email address and/or information ADP maintains on you, where appropriate. Your request will not be processed until your identity has been verified. Once your identity has been confirmed, your request will be processed in accordance with the CCPA.

### **Authorized Agents Submitting a Rights Request on Behalf of a Consumer**

You may choose to designate an authorized agent to make a request under the CCPA on your behalf. No information will be disclosed until the authorized agent's authority has been reviewed and verified. Once a request has been submitted we will communicate any additional requirements necessary to confirm the authorized agents authority. Submit your request at [privacy@adp.com](mailto:privacy@adp.com). The Consumer that is the subject of the request may be contacted to confirm the authorized agent's authority to act on their behalf.

### **How to Contact Us**



Please contact us for more information or if you have questions or comments about our general privacy practices at [privacy@adp.com](mailto:privacy@adp.com). You may also reach us by mail at the address below. If you send us a letter, please provide your name, address, email address, and detailed information about your question, comment, or complaint and relationship with us.

ADP  
ADP Global Data Privacy and Governance Team  
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### **Changes to this CCPA Notice**

We may change or update this CCPA Notice from time to time. When we do, we will post the revised CCPA Notice on this page with a new "Last Updated" date.

For a printable copy of the California Privacy Rights document, please click [www.adp.com/privacy/pdf/ccpaps.en.pdf](http://www.adp.com/privacy/pdf/ccpaps.en.pdf).