



EFFECTIVE DATE: January 1, 2023

COLORADO, CONNECTICUT, UTAH & VIRGINIA CONSUMER PRIVACY STATEMENT

ADP, Inc. and its affiliates (“ADP,” “we,” or “us”) are providing the following Privacy Statement to explain how ADP collects, uses and discloses Personal Information that we collect from individuals (“you”) who are residents of Colorado, Connecticut, Utah, and Virginia including but not limited to users who visit our websites or consumer who receive services directly from ADP. “**Personal Information**” also known as Personal Data is information that identifies, relates to, or could reasonably be linked with a particular individual. Please note that this Privacy Statement does not apply to individuals residing in Colorado, Connecticut, Utah, and Virginia who are acting in an employment or commercial context including employees of ADP clients.

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

Collection and Disclosure of Personal Data

The following details which categories of Personal Data we collect and process, as well as which categories of third parties may have access to your data for operational business purposes. These details are reviewed at least once within the 12 months preceding the date this Privacy Statement was last updated.

(a) Categories of Personal Data

(1) Identifiers

Such as name, contact information, unique personal identifiers, email address, IP address, online identifiers, government-issued identifiers.

(2) Personal Data

Such as name, contact information, financial, education, employment information.

(3) Characteristics of Protected Classifications

Such as race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, marital status, sex, gender expression, gender identify, age, sexual orientation, military, veteran status.

(4) Commercial Information

Such as transaction information and purchase history, including purchases considered, consuming histories or tendencies.

(5) Biometric Information

Not Applicable.

(6) Internet or Network Activity Information

Such as IP address, mobile device ids, MAC address, browsing history, search history.

(7) Geolocation Data

Such as precise location/tracking data and coarse location/tracking data.

(8) Audio/Video Data

Such as photographs.

(9) Education Information

Such as education and training history, education degrees, qualifications/certifications.

(10) Employment Information

Such as professional or employment related information such as work history and prior employer, background checks, performance rating or feedback, employer, occupation title/job role.

(11) Inferences

Such as any assumptions drawn from any of the Personal Data listed above to create a profile about, for example, an individual's preferences or characteristics. This is only applicable to consumers that purchase our TMBC product due to the nature of the product.

(12) Sensitive Personal Information

Such as social security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, citizenship, immigration status, union membership.

(b) Disclosure of Personal Data to Third Parties

ADP may disclose your Personal Data to the following categories of Third Parties:

(1) 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 of 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.

(2) 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.

(3) 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.

(4) 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.

(5) 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.

We do not sell and have not sold Personal Data, including your Sensitive Personal Data, in the preceding 12 months. Without limiting the foregoing, we do not sell the Personal Data, including the Sensitive Personal Data, of minors under 16 years of age.

Sources of Personal Data

We collect 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 third-party sources, such as our affiliates, business partners, and service providers, listed above where applicable.

Purposes for the Collection, Use and Sharing of Personal Data

ADP uses your Personal Data for the following Business Purposes and objectives:

(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.

Consumer Rights

Subject to applicable law, if you receive a product or service directly with ADP as a consumer you may make the following requests:

- (a) **Right to Know** -- You may request that we disclose to you the following information:
- a. The categories of Personal Data we collected about you and the categories of sources from which we collected such Personal Data;
 - b. The specific pieces of Personal Data we collected about you. Sensitive Personal Data will be masked or redacted to protect the security of this type of data;
 - c. The business or commercial purpose for collecting or sharing Personal Data about you;
 - d. The categories of Personal Data about you that we shared (as defined under the applicable privacy law) and the categories of third parties to whom we shared such Personal Data; and
 - e. The categories of Personal Data about you that we otherwise disclosed, and the categories of third parties to whom we disclosed such Personal Data (if applicable).
- (b) **Right to Request Correction of your Personal Data** -- You may request to correct inaccuracies in your Personal Data;
- (c) **Right to Request Deletion of your Personal Data** -- You may request to have your Personal Data deleted; and
- (d) **Right to Opt-out of Targeted Advertising** --You may request to opt out of targeted advertising.

We will not unlawfully discriminate against you for exercising your rights.

How to Submit a Rights Request

To make a privacy request, please contact us by clicking [here](#) or by emailing us at privacy@adp.com. We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Data subject to the request. We may need to request additional Personal Data from you, such as your name and email address, in order to verify your identity and protect against fraudulent requests. If you maintain a password-protected account with us, we may verify your identity through our existing authentication practices for your account and require you to re-authenticate yourself before disclosing or deleting your Personal Data. If you make a request to delete, we may ask you to confirm your request before we delete your Personal Data.

To request to opt out of any future sharing of your Personal Data for purposes of targeted advertising, please go to [ADP.com](https://www.adp.com) and click the Cookie Preferences – Do Not Share My Data link at the bottom of the page to modify your cookie preferences.

Appeal Process

If you are a Colorado, Virginia, or Connecticut consumer, and we refuse to take action on your request, you may appeal our refusal within a reasonable period after you have received notice of the refusal. You may file an appeal by contacting us via email at privacy@adp.com.

Changes to this Consumer Privacy Statement

We may change or update this Privacy Statement from time to time. When we do, we will communicate updates to this Privacy Statement by posting the updated Statement on this page with a new “Last Updated” date.

Contact Us

If you have any questions regarding this Consumer Privacy Statement, please contact us at privacy@adp.com. You may also reach us at:

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