

Privacy Program Overview for ADP Clients

ADP is committed to protecting the privacy and security of all personal data that it processes in order to provide services to its Clients. ADP receives personal data from its Clients about their current, prospective and former employees as well as employee dependents and family members (hereinafter “Individuals”), as needed to provide benefits.

ADP’s Global Data Privacy and Governance Team is responsible for managing ADP’s global privacy program. ADP has implemented a Global Privacy Policy that applies to all ADP Associates worldwide. This overview explains ADP’s practices with regard to the personal data that ADP receives from its Clients as a Data Processor.

When serving as a Data Processor, ADP shall only process personal data of Individuals in accordance with its Client contracts and other instructions that it receives from its Clients. Where applicable, ADP shall also comply with its Binding Corporate Rules for Client Data Processing Services (the Processor Code) which provides the primary legal basis for transfers of Individuals’ Data from its European operations to members of the ADP corporate group of companies located outside of the European Economic Area (EEA).



Collection of Personal Data

ADP’s Clients collect personal data directly from Individuals. In doing so, Clients are responsible for providing necessary notice and obtaining necessary consent. When ADP collects personal data directly from Individuals, ADP provides necessary notice and obtains necessary consent.



Processing Personal Data

ADP processes personal data for the defined purposes for which it was collected, in accordance with Client contracts. ADP may use personal data for analytics, benchmarking and other purposes, only with Clients’ consent.



Retention of Personal Data

ADP will retain personal data in accordance with Client contracts and our Records Information Management (RIM) Program. ADP has created records retention schedules that have been defined for every ADP Product and Business Unit which govern the retention of personal data across ADP globally.



Security of Personal Data

ADP’s Global Security Organization maintains appropriate administrative, technical and physical controls to protect personal data entrusted to ADP. These controls protect personal data from anticipated threats and hazards as well as unauthorized access and use. In each case, ADP will strive to provide security that is proportional to the sensitivity of the personal data being protected, with the greatest effort being focused on protecting sensitive personal data and other personal data whose compromise could result in substantial harm or inconvenience to the Individual.

Compliance



ADP's Global Data Privacy and Governance Team collaborates with the ADP Privacy Stewards, the members of the ADP Legal department and Compliance professionals to ensure that ADP complies with applicable privacy and data protection laws and regulations. Taking into account the sensitivity of the personal data, Associates who access personal data are trained on the appropriate use and handling of personal data as it pertains to their job responsibilities.

Within ADP's Global Security Organization, comprehensive enterprise-wide policies and procedures are in place for managing, tracking and reporting security incidents. ADP's security policies require logging of all actual security incidents reported to ADP by Associates, Clients or other third parties. Once a security incident is reported, ADP's incident response process is designed to ensure that all incidents are addressed in a timely and effective manner and in accordance with ADP security policies, procedures, and legal requirements. When necessary, procedures for the notification of Clients, Individuals and all other parties who may be impacted by the incident are initiated, and appropriate remedial actions are taken.

Contact Us

For additional information about ADP's privacy program, please contact ADP's Global Data Privacy and Governance team at Privacy@adp.com.