

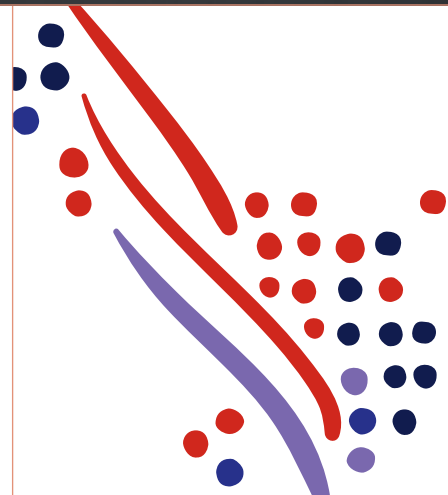


Always Designing
for People®



Privacy @ ADP®

How ADP is helping you
comply with data protection &
privacy laws across the globe



The implementation of the General Data Protection Regulation (GDPR) in Europe has increased everyone's awareness around data privacy and data protection. By unifying the approach to data protection across the European Union, the regulation has set a precedent followed by other countries. From Brazil, China and India to California and other U.S. states, GDPR has been the catalyst for stronger, more clearly defined privacy laws that hold organizations accountable across the globe.



Processing your personal information while staying on top of the mounting compliance challenges of privacy and data protection is one of our founding principles.

As a service provider, we prioritize individuals' privacy and data protection across our products and services. This is why thousands of multinational enterprises and millions of employees and workers worldwide entrust ADP with their most sensitive personal information.

As a company having to comply with privacy legislations covering the personal data we hold for our own employees and business contacts, we've embedded privacy principles within our processes.

Your privacy is our priority

ADP has operationalized the following principles across the globe:

Privacy by Design

Privacy principles are embedded within the ADP business model. We prioritize your privacy and data protection at every stage as we design and develop new technology.



Transparency and Notice

Whether you represent a company, or you are an individual whose data is being processed by ADP either as a service provider or as a company, you will receive information as to how ADP handles your personal data in the relevant ADP Privacy Statement that is made available to you.



Data Minimization and Access Control

We collect and use only the minimum personal data necessary to achieve the business purpose for which it was collected. When ADP processes your data, access is granted based on specific roles and job functions.



Choice and Consent

When collecting your personal data, ADP is committed to respecting your choices. We will process your data for the business purpose it was collected and in accordance with our Client's contracts.



Standardized Records Information Management

Across ADP, our records retention schedules govern the proper retention for every kind of record that ADP maintains and when the records should be destroyed.



Access and Accuracy

Where reasonable or required by law, ADP will provide information that you may request regarding the data we collect in accordance with our Binding Corporate Rules (BCRs). When processing personal data on behalf our Clients, ADP will provide assistance in addressing individuals' requests, in accordance with applicable law and contractual agreement with our Clients. We are committed to providing you with a reasonable opportunity to examine and update your personal data if it is incorrect.



Cross-Border Transfers of Data

ADP will comply with applicable laws in case of transfer of personal data across country borders. Where applicable, ADP shall also comply with its BCRs for Client Data Processing Services (the Processor Code), which provides the primary legal basis for transfers of personal data of our Clients' employees from European locations to members of the ADP group located outside of the European Economic Area (EEA).



Documented Data Processing Activities

We perform data flow mapping and privacy risk assessments (Privacy Impact Assessments) on our data processing activities. This enables us to comply with privacy-related regulatory requirements, and keep an inventory of our processing activities.



Incident Management Process

Our incident response process is designed to ensure that any information security incidents are addressed promptly and effectively, in accordance with ADP security policies, procedures and legal requirements.



Supervision of Third-Party Providers

ADP vendors must meet our data security and privacy standards. Our vendor assurance process enables ADP to assess its vendors prior to entering into a contract with them. Our vendors are contractually required to comply with ADP's privacy principles.



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Protecting the privacy and personal information of our Clients and their employees is of utmost importance to ADP. Our adoption of Binding Corporate Rules approved by the European data protection authorities illustrates our commitment to protect personal data in accordance with the standards required in the EU, regardless of where the European data is processed, accessed or hosted. With the continuing development of privacy laws in many countries around the globe, as well as new standards being adopted by several states within the U.S., we are leveraging the underlying principles of our Binding Corporate Rules to enhance our global privacy program and to help our Clients better navigate the compliance landscape.



Carlos Rodriguez,
President and Chief Executive Officer, ADP

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The pulse of data privacy principles across ADP

At ADP, we believe that a solid governance structure with accountability must sit at the heart of enterprise-wide data privacy initiatives.

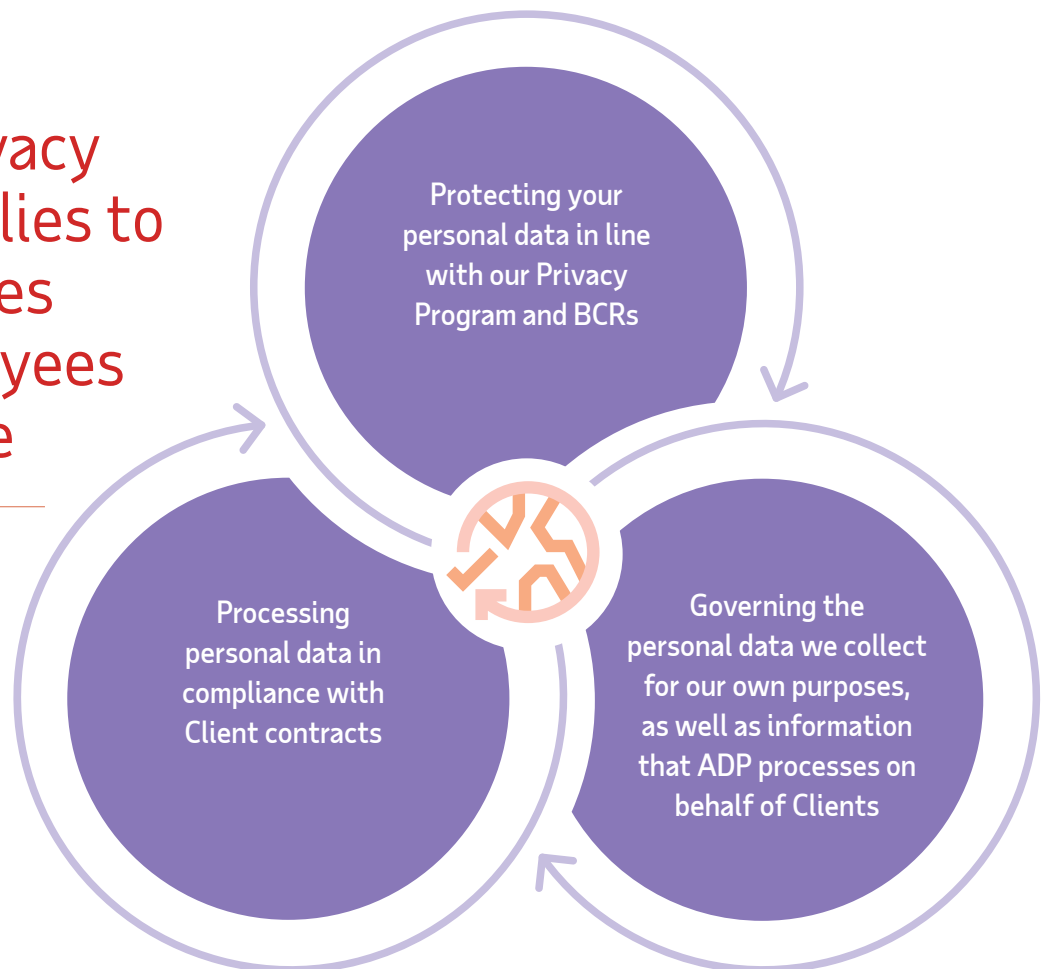
To help operationalize privacy laws across the globe, including the General Data Protection Regulation (GDPR), the Brazilian General Data Protection Law (LGPD), the California Consumer Privacy Act (CCPA), or imminent privacy laws in the U.S. or elsewhere, the Global Data Privacy Team, led by our Chief Privacy Officer, spearheads privacy efforts across our organization. We have established a Privacy Leadership Council comprised of cross-disciplinary professionals, including representatives of our business units.

These leaders play a vital role in promoting the importance of our privacy messaging across ADP. Designated business leaders, known as Privacy Stewards, take on management responsibilities for the processing of your personal data within each



ADP business unit and function. We've found that this approach succeeds in generating a collective energy around data privacy compliance. All ADP associates and contingent workers are trained on privacy and information security.

ADP's privacy policy applies to all affiliates and employees worldwide



ADP achieves the highest standards of global data protection

ADP ranks among an elite group of companies worldwide to have gained regulators' approval to implement BCRs as both a data processor (covering the processing of Clients' data) and data controller (covering the data of our employees and other business associates).



BCRs — an internationally recognized standard for protecting personal data

- BCRs are policies developed internally among a group of companies that share a common parent
- They provide a consistent set of rules on transferring the personal data of Clients, employees and other individuals internationally, regardless of where such data is processed
- BCRs become legally binding once the Data Protection Authorities approve them (the DPAs are the regulators based in each of the EU's Member States, and in the UK)
- BCRs are recognized as a lawful mechanism to safeguard the transfer of personal data out of the European Union (EU) and of the UK
- Authorities regard BCRs as the best option for protecting individuals' privacy rights in accordance with the GDPR requirements

Why we believe that ADP's adoption of BCRs is best for you

- As a BCR-approved data processor, ADP will assist you **in meeting the highest standards expected in Europe, and you will avoid the cost and paperwork** associated with supporting data transfers through multiple model contract clauses
- Through ADP's BCRs, you gain a solution for transferring information about European data subjects that meets your multinational business needs, with the added **clarity and consistency that come from adopting a single global standard**
- **Our BCRs are embedded within ADP's existing global compliance policies and procedures**, providing your data with an extra level of governance



The adoption of BCRs has allowed ADP to implement a comprehensive and robust Privacy Program globally.

Contact ADP's Global Data Privacy and Governance Team

You can contact us at privacy@adp.com.

To learn more about Privacy at ADP, visit <https://www.adp.com/about-adp/data-privacy.aspx>.