

EFFECTIVE DATE: January 1, 2023

LAST UPDATED: February 23, 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 Data that we collect from consumers (“you”) who are residents of Colorado, Connecticut, Utah, and Virginia, including but not limited to users who visit our websites and consumers who receive services directly from ADP. **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](http://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.

#### **(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 and 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 Data**

Such as racial or ethnic origin, religious beliefs, mental or physical health diagnoses, condition, history or treatment, sexual orientation and sex life, citizenship or immigration status, genetic data, biometric data, precise geolocation data, Personal Data collected from a known child.

**(b) Disclosure of Personal Data to Third Parties**

ADP may disclose all of the above categories of 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.

**(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 Personal Data.**

**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. Where we maintain or use de-identified information, we will continue to maintain and use such information only in a de-identified fashion and will not attempt to re-identify such information.

**(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) Operational purposes.** Additionally, ADP uses your Personal Data for 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, you may make the following requests:

- (a) Right to Know** -- You may request to know whether we process your Personal Data and request to access such Personal Data, including, where applicable, a request to obtain a copy of the Personal Data you provided to us in a portable format;
- (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 under applicable privacy law.

### **How to Submit a Rights Request**

To make a privacy request, please contact us by emailing us at [privacy@adp.com](mailto:privacy@adp.com) or by mailing us at: ADP, ADP Global Data Privacy and Governance Team MS 325, One ADP Boulevard, Roseland, NJ 07068-1728 USA. 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 [www.adp.com](http://www.adp.com) and click the Cookie Preferences – Do Not Share My Data link at the bottom of the page and toggle off advertising cookies.**

### **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](mailto: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](mailto:privacy@adp.com). You may also reach us at:

ADP  
ADP Global Data Privacy and Governance Team  
MS 325  
One ADP Boulevard  
Roseland, NJ 07068-1728 USA