



Next-Generation Privacy Protection: GDPR and BCR



A more human resource.™

Why do clients like you trust ADP with their most sensitive personal information? Because protecting your privacy and security is at the heart of our mission.

Privacy regulations and laws not only continue to grow more and more complex. They also can vary greatly across the globe. ADP's privacy pros are committed to keeping your data under wraps, while staying on top of the latest privacy developments to meet the compliance challenges of privacy and data protection.

It's just part of what we do for you every day — and another reason why we're leading privacy protection in human capital management.



Your privacy is our priority

From development to implementation, your privacy is always top of mind when we're developing, refining and improving our products, processes and solutions. Our Privacy Program, which applies to all our affiliates and employees worldwide, constantly evolves to keep up with the changing privacy compliance landscape:





A united front

ADP's Privacy and Data Governance team drives privacy efforts across our business. **The team:**

Is responsible for designing and implementing enterprise wide-compliance programs.

Coordinates with designated ADP executives, who act as Privacy Stewards that oversee the processing of personal data and the privacy and data protection management controls throughout all business practices in their respective area. They regularly report to the Global Security Organization, Privacy and Data Governance team, Compliance Committee and others.



Works closely with the Legal and Global Compliance teams, as well as representatives of different business units and functional areas.

Is comprised of a Chief Privacy Officer, Privacy lawyers, including a Regional Privacy Officer for EMEA, Risk analysts and Privacy Program Managers.

It's just part of our culture

Keeping your information secure is all in a day's work. ADP employees and contractors receive regular training, testing and communications focused on protecting privacy, security and confidentiality. They are required to:

Acknowledge the Global Privacy Policy on a regular basis

Abide by ADP's Code of Business Conduct and Ethics, which prohibits the use and disclosure of client information

Attend mandatory 'Privacy by Design' training for application and product developers to understand rules, standards and instructions, while maximizing user privacy and data security, and minimizing the data we need to collect



Specialized and role-based training programs are also provided, including a wide range of the latest security topics and incident response procedures.

Staying ahead of the curve

We never stop innovating to protect your data. ADP's Privacy Program is driven by two critical initiatives to meet the terms of upcoming privacy laws and enhance our privacy efforts:

GDPR

European Union (EU) General Data Protection Regulation (GDPR) Compliance Project

GDPR is the EU's improved approach to standardizing its privacy laws. In May 2018, GDPR will be replacing local EU privacy laws to:

- Define a baseline for data protection
- Eliminate differences across EU member states
- Increase power of EU regulators
- Enhance privacy rights of individuals

BCR

Binding Corporate Rules (BCRs) Project

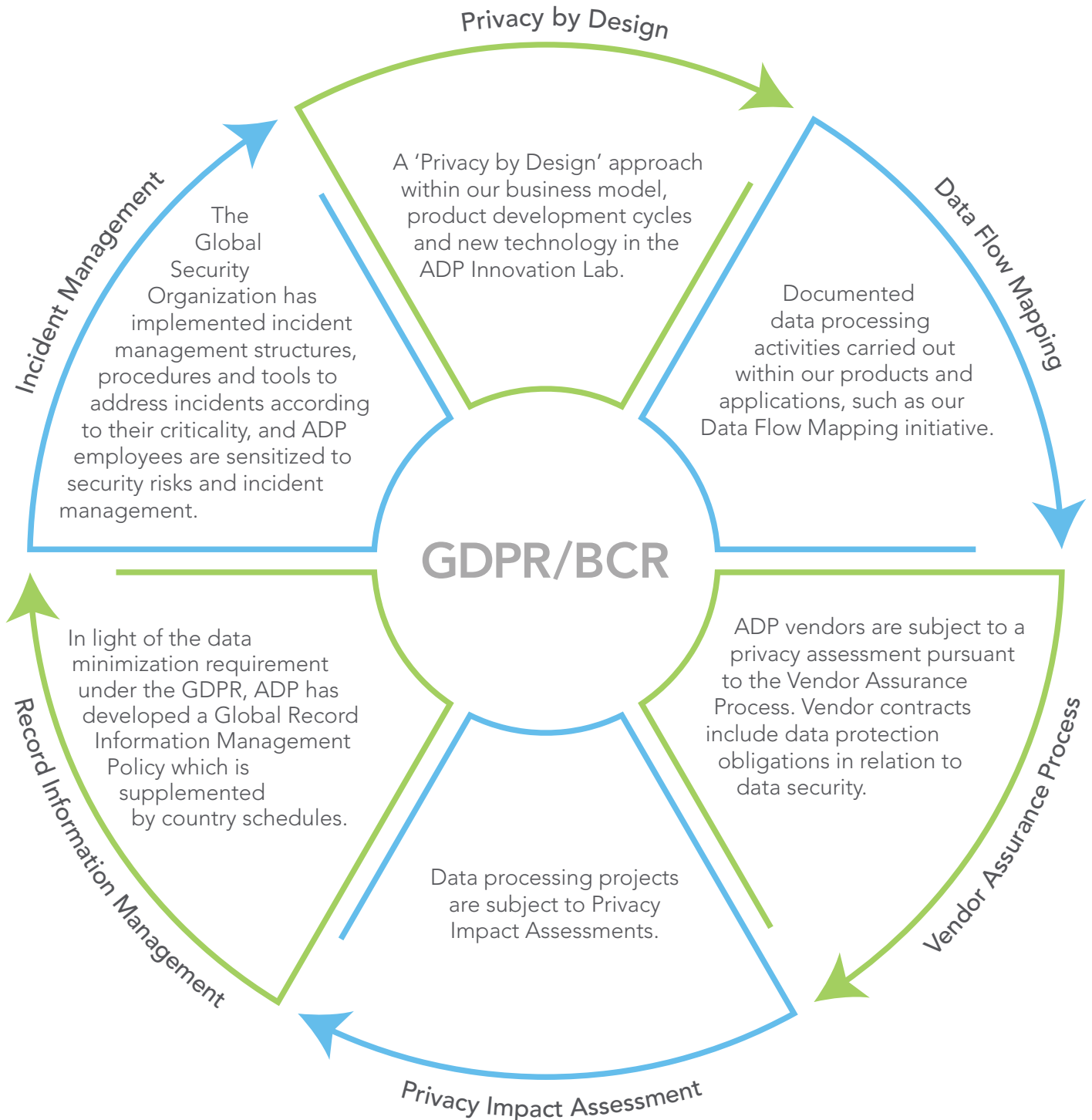
As the "gold standard" for data protection compliance worldwide, BCRs:

- Enables a group of companies to have one set of rules on how to protect personal data, meeting the highest standard expected by the EU
- Consist of policies that are internal to a group of companies and become binding once approved by the EU Data Protection Authorities (DPAs)
- Are recognized by the GDPR as an appropriate safeguard for transfers of personal data out of the EU, and by EU DPAs as a path to compliance with GDPR's accountability obligations

ADP filed an application with the EU DPAs for both Processor and Controller BCRs. We're expecting our BCRs to be approved in 2017, **making ADP one of only 11 companies in the world** to date to have the approval of EU DPAs for Processor BCRs. Our action plans for these initiatives align with our GDPR Project, and we look forward to having them completed in 2018.

It's about accountability

ADP's decision to adopt BCRs reflects our commitment to the highest standard of protection for your personal information. We've already implemented initiatives that are in line with the requirements of the forthcoming GDPR:



On the horizon

ADP is looking ahead and planning for a more secure future. We're preparing our people and our clients for the upcoming GDPR, including assessing and adjusting our processes and documentation.

- Communication campaigns across the company to prepare our teams for the new requirements
- Deployment of our incident management and incident notification procedures across Europe
- Upgrade of our Vendor Assurance Program to include specific GDPR data protection requirements
- Update of our 'Privacy by Design' training to address GDPR specificities
- Roll out and implementation of ADP's Record Information Management (RIM) Policy



Contact us

Have questions about your privacy or these new initiatives? Contact our Privacy and Data Governance team at privacy@adp.com. To learn more about how ADP protects data, visit www.adp.com/trust.

