

# California Employee Privacy Policy

Effective Date: 1/1/2023

This California Employee Privacy Policy is adopted to comply with the California Consumer Privacy Act (CCPA) 2018, Cal. Civil Code Section 1798.100 et. seq., as amended, and related regulations, as may be further amended from time to time ("CCPA Employee Policy"). This CCPA Employee Policy applies solely to former, prospective, and current employees who are California residents ("Employee(s)," "you" or "your"). Any terms defined in the CCPA have the same meaning when used in this CCPA Policy. This CCPA Employee Policy explains how Paychex, and our subsidiaries and affiliates, ("Paychex," "Company," "we," "us," or "our") collect, use, disclose, and retain Personal Information, otherwise known as our Information Practices, and how Employees may exercise their rights under CCPA.

At Paychex, protecting the confidentiality – and privacy – of information you share with us as an Employee is a core professional responsibility and a fundamental part of our work.

This CCPA Employee Policy governs Personal Information collected, processed, or disclosed by Paychex as an employer and does not apply to information provided by general visitors to Company websites, business contacts, or clients.

## What Information is Collected

The CCPA defines Personal Information as "information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household" but does not include certain exempt information, publicly available information, or deidentified or aggregated information. Paychex' Information Practices include the collection and use of Personal Information as set forth below. This CCPA Employee Policy applies to our Information Practices both online and offline.

When you apply for employment, we collect Personal Information from you related to your education, work history, personal history, and other qualifications for employment. When you are hired and act as an Employee, we collect Personal Information about you to provide you compensation, employee benefits, information about your presence at Company facilities, training information, information regarding your use of Company resources, and information related to your work performance, including any discipline, at the Company.

## Data Retention

We retain Personal Information for as long as necessary to fulfill the purposes for which it was collected, including but not limited to the facilitation of the employment relationship, and necessary and essential business purposes such as complying with our legal obligations, maintaining business and financial records, resolving disputes, maintaining security, and detecting and preventing fraud and abuse.

## Our Purposes for the Collection and Use of Personal Information

We may collect Personal Information directly from you, from Company vendors, or indirectly from you, such as when you use Company resources, including Company computers and electronic devices, as the Company has the right to monitor Employees' use of Company resources. Our collection of your Personal Information is limited to facilitating the employment relationship and/or furthering our business purposes relating to performing Company business. These uses will vary depending on the nature of our relationship with you, but may include:

1. Provision of Company services
2. Due diligence in connection with monitoring and evaluation of performance of duties at Company
3. Hiring and onboarding
4. Compensation and any applicable benefits or benefits processing
5. Information security
6. Monitoring use of Company assets and presence at Company facilities
7. Employee engagement
8. Defend or prosecute legal claims
9. From publicly available sources for due diligence screening of prospective Employees
10. Provision of employee recognition programs
11. Training and professional development activities
12. In any other way we may describe when you provide the information, or for which you provide authorization

## Sources of Collection of Personal Information

We collect Personal Information from the following sources:

- **Directly from you** - such as when you provide information directly to us yourself, including in the job application process, new hire onboarding, or during the course of your performance of your duties as an Employee.
- **Indirectly from you** - such as when you use Company resources, including

Company computers and electronic devices and any device connected to or using our network and technology systems, internet, equipment, devices, applications, or third-party systems or tools on behalf of Paychex, as the Company has the right to monitor Employees' use of Company resources.

- **From Company vendors** – including, but not limited to, prospective employment screening agencies or benefits administrators which provide information needed to perform due diligence and operational functions regarding Employees.

## Categories of Third Parties with Whom We Disclose Personal Information

We may use, disclose, or transmit Personal Information we collect to other service providers or other third parties for business purposes, to facilitate the employment relationship, or for other purposes as provided by the CCPA as described below to:

- A. Prospective employment screening agencies
- B. Information technology service providers
- C. Document management and storage vendors
- D. Training software providers
- E. Communication support vendors
- F. Banking and brokerage firms to process payroll-related and/or securities transactions
- G. Insurance carriers
- H. Employee discounts and/or benefits providers
- I. Outside legal counsel
- J. Employee wellness benefit providers
- K. Employee recognition program providers
- L. Human resource services vendors
- M. Any other entity disclosed by Paychex when you provide the information, or for which you provide authorization

The chart below describes the categories of Personal Information collected in the previous twelve (12) months, the business or commercial purposes for such collection, and the categories of third parties with whom we have disclosed Personal Information in the previous twelve (12) months. Paychex will not use Personal Information for any purpose materially different than those disclosed within this notice, as described when you provide the information or for which you provide authorization.

| Category of Personal Information that We May Collect and Transmit | Examples                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Collected During the Past 12 Months | Business or Commercial Purpose(s) | Categories of Third Parties with Whom We Disclosed Personal Information During Past 12 Months |
|-------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|-----------------------------------|-----------------------------------------------------------------------------------------------|
| <b><i>Personal Information</i></b>                                | Full name, address, telephone number, social security number, date of birth, driver's license number, passport numbers, financial, bank account, geolocation data, medical and beneficiary information, signatures, vaccination related information, and similar identifiers                                                                                                                                                                                                                                                                                                                                                                                                                               | Yes                                 | 1-12                              | A-M                                                                                           |
| <b><i>Sensitive Personal Information</i></b>                      | Social security number, driver's license, state ID card, passport number, a consumer account login, financial account, debit card or credit card number in combination with any: required security code, password, credentials allowing access to an account, a consumer's precise geolocation, racial or ethnic origin, religious or philosophical beliefs, union membership, contents of: a consumer's mail, email and text messages (unless the business is the intended recipient), consumer's genetic data, processing of biometric information for the purpose of uniquely identifying a consumer, Information collected and analyzed concerning a consumers health, sex life and sexual orientation | Yes                                 | 1-12                              | A-M                                                                                           |

| Category of Personal Information that We May Collect and Transmit            | Examples                                                                                                                                                                                                                                        | Collected During the Past 12 Months | Business or Commercial Purpose(s) | Categories of Third Parties with Whom We Disclosed Personal Information During Past 12 Months |
|------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|-----------------------------------|-----------------------------------------------------------------------------------------------|
| <b><i>Protected Personal Characteristics</i></b>                             | Age (40 years or older), race, color, ancestry, sex, gender identity, sexual orientation, national origin, marital status, veteran or military status, medical information (including medial conditions, disabilities), and similar identifiers | Yes                                 | 2-4,7-11,12                       | A-C,E,F,H-M                                                                                   |
| <b><i>Profession and Employment Related Information (job applicants)</i></b> | Employment history, job title(s), work descriptions, locations, dates worked, performance evaluations, and similar information                                                                                                                  | Yes                                 | 2-4,6,7,11,12                     | A-C,E,F,H,I,K-M                                                                               |
| <b><i>Education Information (non-public)</i></b>                             | Institution name, degree, GPA, years attended, professional certifications, visa sponsorship and similar information                                                                                                                            | Yes                                 | 3,4,12                            | A-C,E,L,M                                                                                     |
| <b><i>Internet and Other Electronic Identifiers</i></b>                      | Unique user ID, browsing history, cookie data, IP address, unique device information, session logs, analytics logs, geolocation data, and similar identifiers                                                                                   | Yes                                 | 1,2,5,6,9,12                      | A,B,C,E,F,H-M                                                                                 |

| Category of Personal Information that We May Collect and Transmit | Examples                                                                                                                                                     | Collected During the Past 12 Months | Business or Commercial Purpose(s) | Categories of Third Parties with Whom We Disclosed Personal Information During Past 12 Months |
|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|-----------------------------------|-----------------------------------------------------------------------------------------------|
| <b><i>Inference Information</i></b>                               | Profile reflecting preferences, characteristics or predispositions, product and service interests, order histories, search histories and similar information | Yes                                 | 2,3,6,7,10-12                     | A,E,F,H,K-M                                                                                   |
| <b><i>Biometric Information</i></b>                               | Iris, finger, facial scan, or voice used in the creation of identification templates for time products and voice assistance services                         | Yes                                 | 1,2,5,6,8,12                      | B,I,M                                                                                         |
| <b><i>Geolocation Data</i></b>                                    | Physical location, Device coordinates/location, or movements                                                                                                 | Yes                                 | 4-6,12                            | A-C,E,H,I,L,M                                                                                 |
| <b><i>Sensory Information</i></b>                                 | Images, visual, thermal, olfactory information, audio or video recordings related to the services                                                            | Yes                                 | 1,3,5,6,7,12                      | A-C,E,H,I,L,M                                                                                 |

## Categories of Personal Information Sold or Shared to Third Parties

Paychex does not sell or share Personal Information with third parties. We only make business purpose disclosures as detailed above and pursuant to written contracts that describe the purposes of use, require the recipient to keep Personal Information confidential, and prohibit using the disclosed information for any purpose except performing the contract.

## Consumer Rights Under CCPA

The CCPA provides California consumers with specific rights regarding their Personal Information. This section explains how those rights may be exercised by Employees.

1. Employees have the right to request certain information about our collection and use of Personal Information (the "Right to Know"). Employees may only submit two (2) requests per twelve-month period. Employees have the right to request to know or access:
  - The categories of Personal Information collected about the Employee;
  - The categories of sources from which that Personal Information was collected;
  - The categories of third parties to whom we disclose the Personal Information for a business purpose;
  - The business purpose for which we disclose the Employee's Personal information; and/or
  - The specific pieces of Personal Information we have collected about the Employee ("Specific Request to Know").
2. Employees have the right to request correction of Personal Information ("Right to Correct"). We have self-service processes in place to allow Employees to correct Personal Information. You may also call our Human Resources department at 1800-796-6605 if you have additional questions regarding the ability to correct information.
3. Employees have the right to request deletion of Personal Information, subject to certain exceptions (the "Right to Delete"). Once we receive a request and confirm the Employee's identity, we will review the request to determine if an exception allowing us to retain the information applies. We may deny a deletion request if retaining the Personal Information is necessary for us to:
  - Complete the transaction(s) for which we collected the Personal Information including to provide compensation, administer benefits or to fulfill any legal or regulatory requirements.
  - As otherwise allowed by the CCPA.
4. We will not discriminate against Employees in any manner for exercising their CCPA rights.

# How to Exercise Rights Under CCPA

Employees or their authorized agents may submit a request in one of the following ways:

1. By using our [CCPA Request Form](#)
2. By calling 1-800-796-6605

If an Authorized Agent will be making the request on your behalf, the Employee must fill out and sign the [CCPA Authorized Agent Form](#), and the Authorized Agent will need to attach a copy of the completed form to your request. If the request is submitted by someone with a power of attorney (POA), the POA may be submitted instead of the Authorized Agent Form.

When submitting a request under CCPA, we are required to reasonably validate the Employee to appropriately secure Personal Information. If we cannot validate the Employee based on the information provided, we will notify the requestor that we are unable to fulfill the request. We will only use Personal Information provided in the request to verify the Employee's identity or authority to make it. We will confirm receipt of a request within ten (10) business days. We endeavor to respond to a verifiable consumer request within forty-five (45) calendar days of its receipt. If we require more time (up to another 45 calendar days), we will inform you of the reason and extension period. We do not charge a fee to process or respond to a verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will detail why we made that decision and provide a cost estimate before completing the request.

## Updates to this CCPA Employee Policy

Please refer to this CCPA Employee Policy regularly as it may be revised due to legislative changes, changes in technology or our privacy practices or new uses of Personal Information not previously disclosed in this CCPA Employee Policy. Revisions are effective upon posting.

Last Updated July 21, 2025