



## UKG Employee Vault/ MyPeopleDoc® User's Privacy Notice

DECEMBER 13, 2022

### Overview

UKG Inc. and its respective affiliates, including PeopleDoc SAS and PeopleDoc GmbH (collectively, “UKG”, “we” and/or “us”) are committed to protecting the privacy of the individuals (“users” and/or “you” and/or “your”) of the users of UKG Employee Vault/MyPeopleDoc®(e-Vault). By accepting the [Terms and Conditions](#) of e-Vault, you agree to this Privacy Notice (“Notice”) in addition to any other agreements we might have with you.

### I. What is the scope of this Notice?

This Notice applies only to UKG’s e-Vault service, where UKG acts as a data controller of your personal data. This applies where you:

- Are an authorized user of e-Vault.
- When you access, use and interact with e-Vault. This information may include: monitoring activities in e-Vault, the region where e-Vault access originated, the browsers used to access e-Vault, logging information, etc.
- Receive communications from us, including for support and security monitoring.

This Notice does not apply to the other services UKG provides for its customers (i.e., your employer), where UKG acts as a Processor. When UKG is providing those other services, our customers’ privacy policies or agreements with their employees, consultants, or end users govern such processing. Please contact your employer directly for more information.

UKG complies personal data with applicable privacy regulations, including the European Union’s General Data Privacy Regulation (“GDPR”), when processing personal data.

### II. How does UKG collect your personal data?

UKG undertakes to collect only personal data that is strictly necessary to provide e-Vault services personal data. Personal data is collected directly from you and is used only for the purposes for which you have been informed when accepting [the Terms and Conditions](#).

Your personal data will not be used to offer you other services or for sending you commercial communications unless you specifically consent to such use.



### III. What are the Purposes and Legal Basis of the processing of your personal data?

Your personal data is processed in the context of providing e-Vault services for the following purposes:

- To ensure login and activation of your e-Vault account;
- To enable your Employer to send, and you to receive, HR documents;
- To enable you to store your files;
- To ensure that you receive notifications about certain account activity, such as an email when you receive a new HR document;
- To ensure you receive SMS, when two-factor authentication is active;
- To ensure access to UKG's user support and security monitoring services; and
- To enable other functionalities and features related to your e-Vault account.

In addition, UKG must process at least the following personal data for you to maintain an active e-Vault account:

- E-mail address;
- First and last names;
- IP addresses and operating systems information ("latest account activity" feature);
- Phone number (to the extent you have activated a "two-factor authentication").

You may decide to store additional documents and other personal data within your e-Vault account.

UKG also aggregates personal data and uses that aggregated, deidentified information to analyze the effectiveness of its services, to improve and add features, and for other similar purposes.

### IV. The Legitimate Interests pursued by your Employer

Your employer has made the decision to provide you with e-Vault services, as part of your benefits. . It is your choice to register and create an e-Vault account. Once created, your e-Vault account allows you to receive HR documents directly from your employer. If you choose not to create an e-Vault account, you will not be able to receive HR documents through e-Vault.

Your employer has a legitimate interest in offering e-Vault accounts to you, including to support compliance with legal requirements, to increase the transition from paper to digital communications, and to enhance HR operations. As the service provider, UKG processes your personal data in order to provide e-Vault services .



The processing of your personal data is limited to the purposes described in this Notice and the Terms and Conditions. Your rights, including your rights to erasure and access, are available to you.

## V. Retention and Duration of the Services

UKG begins processing your personal data immediately after you create an account. UKG continues to collect and process such data until any of the following events occur:

- Your employment relationship with your employer ends;
- Your employer ceases to send you documents;
- Your e-Vault account is deleted by you.

UKG retain the personal data that it needs to manage your account until your account is deleted.

You may decide to keep your account indefinitely, even if you change employers.

## VI. Transfer of personal data to Third Countries

The personal data processed by UKG to provide e-Vault services is hosted within the European Economic Area (EEA). However, for certain specific services, UKG may use processors located outside the EEA.

These [processors](#) have access to the personal data they need to carry out their services. In such cases, in accordance with the applicable regulations, UKG requires its processors to provide appropriate guarantees, including the signing of Standard Contractual Clauses by the European Commission or other applicable transfer mechanism(s).

We may share your personal data with our [Affiliates & Subsidiaries](#) in order to facilitate delivery of a product or service or to complete a task that you requested.

For more information, please visit [UKG's Privacy and Data Protection](#) page.

## VII. Protecting your personal data

UKG undertakes appropriate measures to ensure the security and confidentiality of your personal data. These measures are designed to prevent personal data from being altered, damaged, or communicated to unauthorized third parties. UKG's security measures are certified and subject to independent audits. For more information, please visit [UKG's Privacy and Data Protection](#) page.

In the case of a data breach (i.e., any unlawful destruction, loss, alteration, or disclosure) affecting your personal data, UKG will comply with its obligations under applicable data privacy laws, including notify any supervisory authority where required.

## VIII. Your Rights:

### A. Erasure and Deletion of you e-Vault account



You may initiate the procedure to delete your e-Vault account at any time. When you delete your account or request that UKG deletes your account, all documents and any associated data, including personal data, are deleted. You may perform the deletion procedure on your own within the e-Vault service. For security purposes, you should not have anyone else delete your account for you.

When you request that your e-Vault account be deleted, all access rights are terminated, and all documents and associated personal data are deleted. The revocation of access rights and deletion of documents and personal data is irreversible; therefore, we strongly advise you to download any information you may later need before performing the deletion process.

UKG is committed to acting on deletion requests as quickly as possible. In all circumstances, UKG will delete your account within 30 business days as of a request being made.

When an e-Vault account is inactive for more than twelve months and no longer contains any documents, UKG may send you a “notice of closure” to the email address associated with your account. If you do not respond to that notice of closure within thirty days, UKG will consider the account abandoned and will delete it (and any documents or personal data in that account will be permanently deleted).

In the event an account owner passes away or otherwise becomes incapacitated, your authorized legacy contact, if any, may access your e-Vault account or have it deleted. To authorize a legacy contact for your account or to learn more about how legacy contacts may access or take other actions with respect to an account where authorized by the account holder to do so, contact support at <https://support.mypeopledoc.com/>.

#### **B. Access, Rectification and Portability:**

You can view, rectify, and download information in your e-Vault account to devices of your choosing at your own risk; UKG disclaims all responsibility and liability associated with the same.

In case you need further assistance, you can contact UKG at [privacy@ukg.com](mailto:privacy@ukg.com).

### **IX. Minors**

Our services are not directed to and do not knowingly collect personal data from minors under the legal working age. If you have reason to believe that a child under the legal working age has provided personal data through the services, please contact us at [privacy@ukg.com](mailto:privacy@ukg.com) and we will endeavor to investigate and delete such personal data from our databases.

### **X. Dispute Resolution**

In accordance with this Notice, UKG will investigate and attempt to resolve complaints and disputes regarding the use and disclosure of your personal information. Additionally, UKG will cooperate with government authorities upon request and in accordance with [UKG Law Enforcement Request Policy](#).

Any privacy-related dispute or concern that is still unable to be resolved to your satisfaction shall be handled in accordance with applicable dispute resolution procedures in accordance with the [Terms and Conditions](#).



If you have a concern about our practices concerning the processing of personal data that we are not able to resolve, you have the right to lodge a complaint with our lead data protection authority, the Commission Nationale Informatique et libertés ( <https://www.cnil.fr/fr/plaintes> or you can write to CNIL - Service des Plaintes - 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07) or with the data protection authority where you reside, each as applicable.

## **XI. Contact Information**

You may contact UKG with questions or concerns about this Notice at [privacy@ukg.com](mailto:privacy@ukg.com).

Written responses may also be submitted to:

PeopleDoc SAS  
Attention: Data Privacy Officer  
53 rue d'Hauteville  
75010 Paris, France

UKG will respond to all correspondence within a reasonable timeframe, including as required by applicable law.