



Wisely® by ADP Consumer Privacy Statement

Effective Date: January 18, 2023
Last Updated: July 30, 2025

This Consumer Privacy Statement explains how Automatic Data Processing Inc., all its consolidated subsidiaries, and Wisely® by ADP (an ADP offering, including, without limitation, Wisely Direct and Wisely Pay products) (hereinafter “ADP”, “Wisely by ADP”, “Wisely”, “our”, or “we”) uses and discloses Personal Data that is collected through Wisely, which includes all webpages associated with Wisely (including, without limitation, mywisely.com), landing pages within the ADP and/or myWisely mobile applications, social media pages associated with Wisely, all application programming interfaces (APIs), file transfers and csv uploads, and all applications and communication tools provided by Wisely when you interact with ADP as a consumer or website user.

I am a consumer of an ADP Product or Service	<u>Wisely by ADP Consumer Privacy Statement</u>	This Privacy Statement explains how we use and disclose Personal Data that we collect from individuals who engage with us as direct consumers of an ADP product or service. This statement does not apply when ADP is acting in its capacity as a service provider to an individual's employer.
I am a business contact of an ADP Product or Service	<u>ADP Privacy Statement for Business Contacts</u>	This Privacy Statement explains how we use and disclose Personal Data that we collect from individuals who visit our websites and otherwise engage with us in business activities, where ADP acts as a controller.
I am an employee of a client that uses ADP Products or Services	<u>ADP Privacy Statement for Client Employees</u>	This Privacy Statement explains ADP practices with regard to the Personal Data that we receive from our clients where ADP acts as a processor.

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.

Wisely by ADP Consumer Privacy Statement

This Privacy Statement explains how ADP uses and discloses Personal Data that we collect from individuals who engage with us as direct consumers of our products or services. Personal Data is any information that identifies you as an individual or relates to an identifiable individual.

This Privacy Statement does not apply to certain information we collect about individuals who apply for or obtain our financial products or service for personal, family or household purposes and is subject to the Gramm-Leach-Bliley Act (“GLBA”). For more information about how we collect, disclose, and secure information of individuals related to financial products or service, please refer to our GLBA notices at <https://www.mywisely.com/app/main/assets/html/53-Privacy-Policy.html> and <https://www.mywisely.com/app/main/assets/html/Meta-Privacy-Policy.html>.

1. Types of Personal Data

This Privacy Statement explains our practices regarding Personal Data collected by Wisely by ADP for the purposes of this offering, product, or service.

Some examples of Personal Data collected or accessed with your permission when you use Wisely include your name, username and password, Social Security number, federal and state government-issued identification documents, date of birth, address, location data, email address, user profile information, worker type, employment information, demographic data, financial and tax information, compensation information, or other information about how you engage with the offering.

2. How Wisely by ADP Collects Personal Data & Categories of Personal Data Collected

With your permission, we will access and use your Personal Data that we have collected (and will collect) when you use an ADP service or product provided by your employer, and which is stored in our human capital management systems of record. Wisely by ADP may collect the following categories of Personal Data from these systems of record: name, home and work location, email address, employment information, demographic data (such as date of birth), financial and tax information, and compensation information (such as wages and bonus payments).

We will also ask you for Personal Data when you interact with us, such as when you register on myWisely.com, set up a Wisely account, sign up to receive marketing communications, or request our services.

Wisely also collects the following categories of Personal Data directly from you when you choose to share them with us: geolocation data, Social Security Number (SSN), date of birth, and bank account information.

We will also access Personal Data about you from affiliates, business partners, third-party data suppliers and publicly available databases.

We need to collect Personal Data to provide the requested services to you. If you do not provide the data requested, we may not be able to provide the services. If you disclose any Personal Data relating to other people to us or to our service providers in connection with Wisely, you represent that you have the authority to do so and to permit us to use the Personal Data in accordance with this Privacy Statement.

If you engage with us through our website, we use cookies and other online tracking technologies to collect data about your device and your use of Wisely.

For more information about cookies and other online tracking technologies, please see the section “**Cookies and Other Automatic Data Collection Technologies**” below.

3. How Wisely by ADP uses Personal Data

Wisely by ADP is a prepaid debit card that enables consumers to receive their pay as an alternative to traditional bank accounts or paper checks. Wisely uses Personal Data to customize and provide the products and services offered to consumers, which may include, without limitation, the creation of consumer accounts, account management support, payments and disbursements, and other services related to your relationship with Wisely.

We also use your Personal Data for the following business purposes:

(a) Business Purposes for processing Personal Data pertaining to consumers. Personal Data pertaining to consumers with whom ADP has a business relationship is processed as needed, for example:

- (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 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 data, we will continue to maintain and use such data only in a de-identified fashion and will not attempt to re-identify such data.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or based on our legitimate interest.

(b) Business-necessary processing activities. We 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.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or based on our legitimate interest.

(c) Development and improvement of products and/or services. We process Personal Data to develop and improve its products and/or services, and for research, development, analytics, and business intelligence.

We engage in these activities based on our legitimate interest.

(d) Relationship management and marketing. We process Personal Data for relationship management, marketing, and to provide personalized services. 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, customer satisfaction surveys, and ADP news.

We will engage in these activities based on our legitimate interests, and with your consent to the extent required by applicable law.

(e) Operational purposes. Additionally, we use 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.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or based on our legitimate interest.

4. Why and How Personal Data is disclosed by Wisely by ADP

We disclose your Personal Data to:

- ADP Group Companies, which use your Personal Data for the purposes listed in this Privacy Statement;
- Our service providers, to facilitate services they provide to us. These can include providers of such services as website and application hosting, data analysis, payment processing, order fulfillment, fraud prevention, information technology and related infrastructure provision, customer service, email delivery, and auditing;
- Uses necessary to enforce our rights, protect our property, protect the rights, property or safety of others, in connection with any proposed or actual reorganization, bankruptcy, merger, sale, joint venture, assignment, transfer of ADP, or other disposition of all or any portion of ADP business or assets, or as needed to support external auditing, compliance and corporate governance functions;

- Third parties, including law enforcement agencies when required and to protect and defend our legal rights, protect the safety and security of users of our services, prevent fraud, respond to legal process (e.g. subpoena or court order), or a request for cooperation by a government entity, including as required by law.

5. Additional US State Specific Privacy Disclosure

The following details the categories of Personal Data we collect and process, which categories of third parties may have access to your Personal Data for operational business purposes, as well as which categories of Personal Data we “share” for purposes of cross-context behavioral or targeted advertising, including within the 12 months preceding the date this Privacy Statement was last updated.

Categories of Personal Data	Disclosed to Which Categories of Third Parties for Operational Business Purposes <i>(see below for a more detailed description of these categories)</i>	Processing Purposes <i>(See Section 3 – “How Wisely by ADP Uses Personal Data” – for complete list)</i>	Shared with Which Categories of Third Parties for Cross-Context Behavioral or Targeted Advertising
Identifiers , such as name, contact information, unique personal identifiers, email address, IP address, and federal or state government-issued identification documents.	Service Providers/ Subcontractors, Related Entities, Law Enforcement/Legal Authorities, Corporate Transactions, Third Parties with Your Consent	(a)(1), (a)(2), (a)(3), (a)(4), (a)(5), (a)(6), (b), (d), (e)	Ad networks. <i>(See Opt-Out sharing of Personal Data section below for your options.)</i>
Personal information as defined in the California customer records law , such as name, contact information, financial and payment card information, and employment information.	Service Providers/ Subcontractors, Related Entities, Law Enforcement/Legal Authorities, Corporate Transactions, Third Parties with Your Consent	(a)(1), (a)(2), (a)(3), (a)(4), (a)(5), (a)(6), (b), (c), (d), (e)	None
Characteristics of protected classifications under California or federal law , such as age, national origin, sex, and military or veteran status.	Service Providers/ Subcontractors, Related Entities, Law Enforcement/Legal Authorities, Corporate Transactions, Third Parties with Your Consent	(a)(1), (a)(2), (a)(4), (a)(5), (b), (c), (e)	None
Commercial Information , such as transaction information and purchase history.	Service Providers/ Subcontractors, Related Entities, Law Enforcement/Legal Authorities, Corporate Transactions, Third Parties with Your Consent	(a)(1), (a)(2), (a)(3), (a)(4), (a)(5), (a)(6), (b), (c), (d), (e)	None
Biometric Information , such as fingerprints or facial recognition.	Not Applicable	Not Applicable	Not Applicable
Internet or network activity information , such as IP address, mobile device ids, and MAC address.	Service Providers/ Subcontractors, Related Entities, Law Enforcement/Legal Authorities, Corporate Transactions	(a)(1), (a)(2), (a)(4), (a)(6), (b), (e)	Ad networks. <i>(See Opt-Out sharing of Personal Data section below for your options.)</i>
Geolocation Data , such as precise location/tracking data and coarse location/tracking data.	Service Providers/ Subcontractors, Related Entities, Law Enforcement/Legal Authorities, Corporate Transactions	(a)(1), (a)(2), (a)(3), (a)(4), (a)(5), (a)(6), (b), (c), (e)	None

Categories of Personal Data	Disclosed to Which Categories of Third Parties for Operational Business Purposes (see below for a more detailed description of these categories)	Processing Purposes (See Section 3 – “How Wisely by ADP Uses Personal Data” – for complete list)	Shared with Which Categories of Third Parties for Cross-Context Behavioral or Targeted Advertising
Audio/Video Data , such as photographs or call recordings.	Service Providers/ Subcontractors, Related Entities, Law Enforcement/Legal Authorities, Corporate Transactions	(a)(1), (a)(2), (a)(3), (a)(4), (a)(5), (a)(6), (b), (c), (e)	None
Education Information subject to the federal Family Educational Rights and Privacy Act such as education and training history, education degrees, qualifications/certifications.	Not Applicable	Not Applicable	Not Applicable
Employment Information. Professional or employment-related information, such as professional or employment related information such as employer, occupation, and compensation.	Related Entities, Law Enforcement/Legal Authorities, Corporate Transactions, Third Parties with Your Consent	(a)(1), (a)(2), (a)(4), (a)(5), (b), (e)	None
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.	Not Applicable	Not Applicable	Not Applicable
Sensitive Personal Information , driver's license, Social Security card, state or military identification card, passport number, Visa Number, or Permanent Resident Card number; account log-in, financial account, payment card, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; or Personal Data collected from a known child.	Service Providers/ Subcontractors, Related Entities, Law Enforcement/Legal Authorities, Corporate Transactions, Third Parties with Your Consent	(a)(1), (a)(2), (a)(4), (a)(5), (a)(6), (b), (e)	None

Opt-out of Targeted Advertising / “Sharing” of Personal Data

To request to opt out of any future targeted advertising, including the “sharing” of your Personal Data for purposes of cross-context behavioral advertising, please go to mywisely.com and click the **Cookie Preferences – Do Not Share My Data** link at the bottom of the page to toggle off advertising cookies.

Detailed Description of Categories of Third Parties

Third Parties to which we may disclose your Personal Data are as follows:

Service Providers/Subcontractors

We may share your Personal Data with our service providers/subcontractors for certain business purposes. This information is provided in order for them to provide us 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.

Related Entities

We may share Personal Data between and among ADP, its subsidiaries, and affiliated companies for purposes of management and analysis, and other business purposes. For instance, we may share your Personal Data with our subsidiaries and affiliated companies to expand and promote our product and service offerings.

Law Enforcement/Legal Authorities

We may be required to disclose your Personal Data to third parties including law enforcement agencies when required and to protect and defend our legal rights, protect the safety and security of users of our services, prevent fraud, respond to legal process (e.g. subpoena or court order), or a request for cooperation by a government entity, including as required by law.

Corporate Transactions

In the event of sale, transfer, merger, reorganization, or similar event, we 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.

Third Parties With Your Consent

We may share Personal Data about you with other third-party companies if you give us permission or direct us to share the information. We will share Personal Data with authorized agents that you authorize ADP to communicate to.

We do not sell and have not sold Personal Data, including your Sensitive Personal Data, in the preceding 12 months.

Sources of Personal Data

We collect this Personal Data actively (e.g. direct input from individuals) or passively (e.g., website cookies) from you. Additionally, we may also collect Personal Data from human resources systems of record used by your employer, third-party sources, such as our affiliates, business partners, and service providers.

6. Cookies and Other Automatic Data Collection Technologies

When you visit our website or use our mobile applications, we collect certain data by automated means, using online tracking technologies such as cookies, pixel tags, browser analysis tools, server logs, and web beacons.

Cookies. When you visit our website, we place cookies on your computer. Cookies are small text files that websites send to your computer or other Internet-connected device to uniquely identify your browser or to store information or settings in your browser. Cookies allow us to recognize you when you return. They also help us provide a personalized experience and enable us to detect certain kinds of fraud. In many cases, you can manage cookie preferences and opt-out of having cookies and other data collection technologies used by adjusting the settings on your browser. All browsers are different, so visit the “help” section of your browser to learn about cookie preferences and other privacy settings that may be available.

Pixel Tags and Web Beacons. Pixel tags and web beacons are tiny graphic images placed on website pages, in our apps, or in our emails that allow us to determine whether you have performed a specific action. When you access webpages or app functionalities, or when you open or click an email, the pixel tags and web beacons

generate a notice of that action. These tools allow us to measure response to our communications and improve our online offerings and promotions.

Automatically Collected Data. We collect many different types of data from cookies, pixels, tags, web beacons, and other online tracking technologies such as browser analysis tools. For example, we collect data from the device you use to access our website, such as your operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located.

Our server logs also record the Internet Protocol (IP) address assigned to the device you use to connect to the Internet. An IP address is a unique number that devices use to identify and communicate with each other on the Internet. We may also collect information about the website you were visiting before you came to ADP and the website you visit after you leave our site.

In many cases, the data we automatically collect using cookies and other online tracking technologies is only used in a non-identifiable way, without reference to Personal Data. For example, we use data we collect about website users to optimize our websites and to understand general website traffic patterns. In some cases, we do associate the data we automatically collect using cookies and other online tracking technologies with your Personal Data. This Privacy Statement applies to such automatically collected data when we associate it with your Personal Data.

Global Privacy Control. We also process opt-out preference signals, such as the Global Privacy Control (GPC). The GPC is a mechanism that enables consumers to automatically communicate their privacy preferences to opt-out of sale and sharing of their personal information to this website. This ensures that the consumer's opt-out preference is honored through compatible browsers or extensions that support GPC, consistently across all websites accessed through the browser or device you are using. Go to your browser's setting to enable GPC. If enabled you will receive notification or see a visual indication (e.g., banner or pop-up message) on our site confirming that your GPC signal has been detected and your opt-out request has been processed. For information about how to use the Global Privacy Control, please visit <https://globalprivacycontrol.org>.

Do Not Track. Although our website currently does not have a mechanism to recognize the various web browser Do Not Track signals, we do offer consumers choices to manage their preferences that are provided in sections 16 and 17 below. To learn more about browser tracking signals and Do Not Track please visit <http://www.allaboutdnt.org>.

Mobile Applications. Wisely by ADP is part of a mobile application that allows you to access your profile and account, interact with us online, and receive other information via your mobile device. When you download and use our application, we and our service providers may track and collect app usage data, such as the date and time the application on your device accesses our servers and what information and files have been downloaded to the application based on your device number. We use this information to understand how the application is used and improve it.

YouTube Videos. Our website may include embedded YouTube videos. When you click on an embedded YouTube video that video is loaded from a domain operated by YouTube. Although we have enabled the Privacy-Enhanced mode for embedded YouTube videos, which prevents YouTube from placing tracking cookies on your device when viewing these videos on our site, YouTube may collect your IP address and other devices information for their own purposes. To learn more about YouTube's Privacy-Enhanced mode visit the YouTube support page at <https://support.google.com/youtube/answer/171780?hl=en-GB&ref=axbom.com#>. To learn more about YouTube's processing of IP addresses visit YouTube's privacy policy at <https://policies.google.com/privacy?sjid=60584270626491410-NA>.

7. Third-Party Advertising

We use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you when you access and use Wisely and other websites or online services. You may receive advertisements based on information relating to your access to and use of Wisely and other websites or online services on any of your devices, as well as on information received from third parties. These companies place or recognize a unique cookie on your browser (including through the use of pixel tags). They also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop.

If you would like more information about this practice, and to learn how to opt out of it in desktop and mobile browsers on the particular device on which you are accessing this Privacy Statement, please visit <http://optout.aboutads.info/#/> and <http://optout.networkadvertising.org/#/>. You may download the AppChoices app at www.aboutads.info/appchoices to opt out in mobile apps.

8. Third-Party Analytics

Wisely by ADP uses third-party analytics providers, such as Google Analytics and Pendo. These services use cookies and similar technologies to collect and analyze information about the use of Wisely and report on activities and trends. These services may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to <https://policies.google.com/technologies/partner-sites> and exercise the opt-out provided by Google by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>. You can learn about Pendo's practices by going to <https://www.pendo.io/legal-information>.

9. Shape Security

We use F5's XC Bot Defense (Shape Security) to protect against spam, bots and other automated abuse. This tool may make use of cookies, as well as other information like IP address, date, time, language, screen size and resolution, and mouse movements, while on the page. The use of this service and the treatment of any information collected through the service are subject to F5's applicable privacy policies, available at <https://www.f5.com/company/policies/privacy-compliance-and-practices>.

10. Physical Location

We may collect the physical location of your device by, for example, using satellite, cell phone tower or WiFi signals. We may use your device's physical location to provide you with personalized location-based services and content. We may also share your device's physical location, combined with information about the advertisements you viewed and other information we collect, with our marketing partners to enable them to provide you with more personalized content and to study the effectiveness of advertising campaigns. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device's location, but if you do, we and/or our marketing partners may not be able to provide you with the applicable personalized services and content.

11. Information Security

Wisely by ADP is committed to maintaining the appropriate organizational, technical, and physical controls designed to protect Personal Data entrusted to us from anticipated threats and hazards and unauthorized access and use. Wisely will strive to provide security that is proportional to the sensitivity of the Personal Data being protected. Additional information about ADP's Global Security Organization may be found at <http://www.adp.com/trust>.

12. Data Retention

We retain Personal Data for as long as needed or permitted in light of the purpose(s) for which it was collected. The criteria used to determine our retention periods include:

- (a) The length of time we have an ongoing relationship with you and provide services to you (for example, for as long as you have an account with us or keep using our services) and the length of time thereafter during which we may have a legitimate need to reference your Personal Data to address issues that may arise;
- (b) Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- (c) Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

13. Third Party Services

This Privacy Statement only addresses the use and disclosure of Personal Data by Wisely by ADP. This Privacy Statement does not address, and we are not responsible for, the privacy, data, or other practices of any third parties, including any third party operating a website, app, or service to which Wisely links. This inclusion of a link does not imply our endorsement of the linked site or services. Our suppliers, business partners, and other third-party websites that may be accessible through Wisely have their own privacy statements and data collection, use and disclosure practices. We encourage you to familiarize yourself with the privacy statements provided by third parties prior to providing them with information.

Wisely may provide functionality allowing you to make payments using a third-party payment service with which you have created your own account. When you use such a service to make a payment to us, your Personal Data will be collected by such third party and not by us and will be subject to the third party's privacy policy, rather than this Privacy Statement. We have no control over, and are not responsible for, any such third party's collection, use or disclosure of your Personal Data.

14. Use by Minors

Wisely by ADP is not directed to individuals under the age of thirteen (13) and we do not knowingly collect Personal Data from individuals under thirteen (13). We do not sell or knowingly "share" (for cross-context behavioral advertising purposes) the Personal Data, including the Sensitive Personal Data, of minors under eighteen (18) years of age (or other age of majority in the applicable jurisdiction).

15. Sensitive Data

Subject to your consent where required by applicable law, we collect, use, and disclose Sensitive Personal Data for purposes of performing services for our business, providing goods or services as requested by you, ensuring safety, security and integrity, short term transient use such as displaying first party, non-personalized advertising, servicing accounts, providing customer service, verifying customer information, processing payments, providing analytic services, providing storage, activities relating to quality or product improvement, and other collection and use that is not for the purpose of inferring characteristics about an individual. We do not use Sensitive Personal Data beyond these purposes.

Unless we request it, we ask that you not send us, and you not disclose, any Sensitive Personal Data (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics or criminal background) on or through Wisely or otherwise to us.

16. Communication Preferences

You may limit the information you provide to us. You may also limit the marketing communications that we send to you. To opt-out of marketing emails, simply click the link labeled "unsubscribe" at the bottom of any marketing email we send you.

Please note that if you are currently receiving services from us and you have decided to opt-out of marketing communications, we may still send you important administrative messages, from which you cannot opt-out.

If you have questions about your choices or if you need assistance with opting out, please contact us via email to privacy@adp.com. You may also write us at the address in the "How to Contact Us" section below. If you send us a letter, please provide your name, address, email address, and information about the communications that you do not want to receive.

17. Access, Correction, Erasure, and Other Individual Rights

You may contact wiselyprivacy@adp.com to request access to your data, to exercise any of the individual rights afforded to you by us or by applicable data protection laws and regulations. You may also write to us at the address in the "How to Contact Us" section below. If you send us a letter, please provide your name, address, email address, and detailed information about the changes you would like to make. We will respond to requests in accordance with applicable data protection laws.

To make an individual rights request for access, correction erasure or other rights, please contact us by completing our [Wisely by ADP Privacy Rights Request Form](#) or by emailing us at wiselyprivacy@adp.com. 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.

You may also write to us at the address in the “**How to Contact Us**” section below. If you send us a letter, please provide your name, address, email address, and detailed information about your request. We will respond to requests in accordance with applicable data protection laws.

Additional Individual Rights for US Consumers

US consumers may make the following specific rights requests, subject to applicable US consumer privacy law:

- (a) **Right to Access, Know and Portability** -- 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.

You may also request that we disclose the following information to you:

- (1) The categories of Personal Data we collected and process about you and the categories of sources from which we collected such Personal Data;
 - (2) The specific pieces of Personal Data we collected about you;
 - (3) The business or commercial purpose for collecting or sharing Personal Data about you;
 - (4) The categories of Personal Data about you that we shared (as defined under the CCPA) and the categories of third parties with whom we shared such Personal Data; and
 - (5) The categories of Personal Data that we disclosed about you to third parties, and the categories of third parties to whom we disclosed such Personal Data (if applicable).
 - (6) A list of third parties to whom your Personal Data was disclosed.
- (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 for Targeted Advertising / “Sharing” for Cross-Context Behavioral or Targeted Advertising** -- You may request to opt-out of targeted advertising, including the “sharing” of your Personal Data for purposes of cross-context behavioral.

To request to opt-out of any future targeted advertising, including the “sharing” of your Personal Data for purposes of cross-context behavioral advertising, please go to [ADP.com](https://adp.com) and click the Cookie Preferences – Do Not Share My Data link at the bottom of the page to toggle off advertising cookies.

We also process opt-out preference signals, such as the Global Privacy Control (GPC). The GPC is a mechanism that enables consumers to automatically communicate their privacy preferences to opt-out of sale and sharing of their personal information to this website. This ensures that the consumer's opt-out preference is honored through compatible browsers or extensions that support GPC, consistently across all websites accessed through the browser or device you are using. Go to your browser's setting to enable GPC. If enabled you will receive notification or see a visual indication (e.g., banner or pop-up message) on our site confirming that your GPC signal has been detected and your opt-out request has been processed. For information about how to use the Global Privacy Control, please visit <https://globalprivacycontrol.org/>.

We will not unlawfully discriminate against you for exercising your rights under applicable US consumer privacy law.

Authorized Agents Submitting a Request on Behalf of a Consumer

You may choose to designate an authorized agent to make a request on your behalf. No information will be disclosed until the authorized agent's authority has been reviewed and verified. Agents may be asked to provide proof of their status as an authorized agent. Once a request has been submitted by an authorized

agent, we may require additional information from you to verify your identity or confirm that you provided the agent permission to submit the request. Authorized agents may submit their request as detailed above.

Appeal Process

If you are a Colorado, Virginia, Montana, Oregon, Texas, 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 wiselyprivacy@adp.com.

Nevada Privacy Rights

ADP collects personal information from you in the course of providing requested services. Unless otherwise stated, ADP does not sell any Covered Information, as defined under Nevada law (S.B. 220). If you would like to make a further inquiry regarding the selling of your Covered Information, as defined under Nevada law, please contact privacy@adp.com.

18. How to Contact Us

Please contact us if you have questions regarding this Privacy Statement. You may reach us via email at wiselyprivacy@adp.com or via mail at address below. If you send us a letter, please provide your name, address, email address, and detailed information about your question.

ADP Global Data Privacy and Governance Team

MS 325

One ADP Boulevard

Roseland, NJ 07068-1728

USA <https://www.mywisely.com/app/main/assets/html/Meta-Privacy-Policy.html>

19. How to Lodge a Complaint

If you believe that we have not handled your Personal Data properly or that it has breached its privacy obligations, under any applicable data protection laws, you may file your complaint in writing to the address above in the “**How to Contact Us**” section, or via email, to the Global Data Privacy and Governance Team at privacy@adp.com.

The Global Data Privacy and Governance Team will investigate each complaint and notify you within a reasonable timeframe of the outcome of the investigation. If you are not satisfied by the resolution you may file a complaint or claim with the relevant regulatory authorities or the courts.

20. Changes to this Privacy Statement

From time to time, we may update this Privacy Statement, and we encourage you to review it regularly. If we make changes, we will notify you by revising the date at the top of the statement with a new “**Last Updated**” date. Any changes will become effective when we post the revised Privacy Statement on our sites or within our application. For a printable copy of this Privacy Statement, please go to <https://www.mywisely.com/wp-content/uploads/2025/06/wisely-privacy-policy.pdf>.

The Wisely Pay Visa® is issued by Fifth Third Bank, N.A., Member FDIC or Pathward®, N.A., Member FDIC, pursuant to a license from Visa U.S.A. Inc. The Wisely Pay Mastercard® is issued by Fifth Third Bank, N.A., Member FDIC or Pathward®, N.A., Member FDIC, pursuant to license by Mastercard International Incorporated. The Wisely Direct Mastercard is issued by Fifth Third Bank, N.A., Member FDIC. ADP is a registered ISO of Fifth Third Bank, N.A., or Pathward, N.A. The Wisely Pay Visa card can be used everywhere Visa debit cards are accepted. Visa and the Visa logo are registered trademarks of Visa International Service Association. The Wisely Pay Mastercard and Wisely Direct Mastercard can be used where Debit Mastercard is accepted. Mastercard and the circles design are registered trademarks of Mastercard International Incorporated. Wisely, myWisely, and the Wisely logo are registered trademarks of ADP, Inc. All rights reserved.