

Transparency Report – Government Requests

January 1, 2024

Overview

UKG is committed to the privacy and security of our customers' information. Accordingly, we subject government requests for such information to a careful review, and we will not respond to government requests that fail that review. Our commitment includes transparency on how we handle such government requests – in particular, those received from federal, state, local, and international law enforcement and national security agencies ("Government Requests"). We publish transparency reports twice per year, providing information about the Government Requests that we have received in the preceding six-month period.

The following principles guide our commitment to protecting the privacy and security of our customers' users and explain how we will handle Government Requests:

- **We will be transparent.** We will disclose the number and types of Government Requests for information we receive, and notify our customers when information about one or more of their users has been requested, to the maximum extent permitted under the law.
- **We will support our customer in responding to Government Requests.** In the event we do receive a Government Request, we will promptly report it to the customer, unless we are prohibited by law from doing so, and defer to our customer in terms of how they want to handle it. *We have never had a situation where we have been prohibited from telling a customer about a Government Request.*
- **If we are not legally permitted to tell our customer about a Government Request, we will push back against requests that are not appropriate or appropriately narrow.** Any Government Request must be narrowly tailored to specific individuals and legitimate investigations. All Government Requests are reviewed by our legal department. If we believe that the reasons for not informing the customer are inappropriate or inconsistent with our commitment to protecting customers' users' privacy rights, or where a request is overly broad, we will challenge the request, including by going to court if necessary.
- **We are committed to protecting all end users of our products and services.** UKG is committed to providing the same level of protection to all end users of our products and services. We will apply the same process and principles to scrutinize all Government Requests, regardless of the origin of the request or the location of the end user.
- **We do not support "back door" access to any of our products, services, or operations (including our data stores) by any government or third-party.** UKG does not share its encryption keys, nor does it provide the ability to break its encryption keys with any government or third-party.

UKG Policy

Except in very limited cases (UKG Employee Vault), our customer is the controller and owner of the user data in our systems. If UKG receives a Government Request, UKG will respond that it is the processor of this data and direct the requesting agency to reach out directly to the customer.

In the event the government agency rejects that position, UKG will follow its internal Law Enforcement Request Policy. Under that Policy, UKG Legal reviews the Government Request to ensure that it is valid, lawful, appropriately scoped, sufficiently detailed, and duly-issued by an appropriate government agency, and complies with all applicable legal and statutory safeguards. UKG will use

reasonable and lawful efforts to challenge any Government Request that does not meet these requirements. UKG will not disclose an end user's data in response to a Government Request unless the customer has authorized UKG to do so or, after following the process described above, UKG is required by law to do so first without notifying the customer.

Transparency Report

This report covers Government Requests received during the period from July 1st, 2023 through December 31st, 2023.

US Government Requests – Criminal Investigations

UKG has not received a Government Request from any US federal, state, or local law enforcement agency in connection with an investigation of a violation of criminal law in which UKG has been prohibited from first notifying the customer of a request before responding to it and obtaining the customer's input and authorization on the response.

US Government Requests – National Security Investigations

UKG has not received a Government Request under US national security law (such as National Security Letters (NSLs) or a request under the Foreign Intelligence Surveillance Act (FISA), including under FISA Section 702) from a US federal, state, or local national security agency in which UKG has been prohibited from first notifying the customer of a request before responding to it and obtaining the customer's input and authorization on the response.

International Government Requests

UKG has not received a Government Request from any law enforcement or government agency outside the US in connection with an investigation of a violation of criminal law or under a country's national security laws in which UKG has been prohibited from first notifying the customer of a request before responding to it and obtaining the customer's input and authorization on the response.

Period	Requests	Number
July 1 st , 2023, to December 31 st , 2023	Requests from a US federal, state, or local law enforcement agency seeking information in connection with an investigation of a violation of criminal law	0
July 1 st , 2023, to December 31 st , 2023	Requests under US national security law (such as NSLs, FISA, or FISA Section 702)	0
July 1 st , 2023, to December 31 st , 2023	Requests from a law enforcement or government agency outside the US seeking information in connection with an investigation of a violation of criminal law or under a country's national security laws	0