

PayPro TPA California Consumer Privacy Notice (CCPA/CPRA)

Effective Date: August 20, 2026

1. Purpose and Scope

This Notice describes how PayPro TPA handles personal information in accordance with the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA).

2. Our Role as a Service Provider

PayPro TPA ("PayPro") generally acts as a service provider and contractor on behalf of employers, employee benefit plans, plan sponsors, and other business clients. In connection with payroll administration, COBRA administration, and employee benefit services, PayPro processes personal information on behalf of and under the direction of its clients in accordance with applicable contracts and legal requirements. While PayPro primarily processes information for the benefit of its clients and their plan participants, PayPro may also process personal information as necessary to maintain system security, prevent fraud, comply with applicable laws and regulations, respond to consumer requests, fulfill contractual obligations, and protect the rights and interests of PayPro, its clients, and plan participants. PayPro does not sell personal information and does not share personal information for cross-context behavioral advertising.

3. Public Website Practices

The public website located at www.payprotpa.com is primarily informational. The website may provide enrollment forms and other documents that individuals may download, complete, and provide to their employer or plan sponsor. Information entered into downloadable forms is not collected, stored, maintained, or retained by the public website itself. The public website does not collect claims, payroll transactions, reimbursement requests, COBRA elections, or account-based plan transactions.

4. Third-Party Administrative Platforms

PayPro currently utilizes WEX platforms, MPAY platforms, and may utilize additional payroll, banking, benefits administration, claims, reimbursement, compliance, technology, and service-provider platforms as needed. Personal information submitted through those platforms is governed by applicable privacy notices, contracts, and legal requirements.

5. Categories of Personal Information Processed

Depending on the services provided, PayPro may process identifiers, contact information, employment information, payroll information, benefit enrollment information, dependent information, financial information, government identifiers, eligibility information, and information required to administer employee benefit plans.

6. Sensitive Personal Information

Sensitive Personal Information may include Social Security numbers, government-issued identification numbers, financial account information, account credentials, and health-related information. Such information is processed only for authorized business purposes.

7. Business Purposes

Administration of payroll, COBRA, HSAs, FSAs, HRAs, commuter benefits, reimbursements, eligibility determinations, participant support, fraud prevention, security, legal compliance, and related administrative functions.

8. Sale and Sharing

PayPro does not sell personal information and does not share personal information for cross-context behavioral advertising.

9. California Privacy Rights

California residents may have rights to know, access, correct, or delete personal information, subject to applicable legal limitations, exemptions, and verification requirements.

10. Authorized Agents

Authorized agents may submit requests on behalf of California residents when proper authorization is provided.

11. How to Exercise Your Rights

Requests may be submitted to the Privacy Officer by mail, email, or telephone. PayPro may request identity verification before responding and will respond within applicable legal timeframes.

12. Data Retention

Personal information is retained only as long as reasonably necessary for service delivery, contractual obligations, legal compliance, dispute resolution, record retention obligations, and protection of legal rights.

13. HIPAA and Other Exemptions

Certain health information maintained on behalf of group health plans, covered entities, plan sponsors, or business associates may constitute Protected Health Information subject to HIPAA. To the extent information is governed by HIPAA, portions of the CCPA/CPRA may not apply. Nothing in this Notice limits protections available under HIPAA or other applicable laws.

14. Security

PayPro maintains reasonable administrative, technical, and physical safeguards designed to protect personal information.

15. Non-Discrimination

PayPro will not discriminate against individuals for exercising rights provided under California privacy laws.

16. Privacy Officer Contact Information

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