

Privacy Policy

The Ultimate Software Group, Inc. (“Ultimate Software”) respects the privacy of our customers, employees, Web site visitors, and job applicants. We believe it is important for you to understand the type of information we collect about you and how that information is used. We recognize the need for appropriate safeguards and management of Personal Information you provide to us. This Privacy Policy sets forth the privacy principles Ultimate Software follows with respect to your Personal Information.

Safe Harbor

Ultimate Software adheres to the Safe Harbor privacy framework developed by the U.S. Department of Commerce in consultation with the European Commission’s Directive on Data Protection on the transfer of Personal Information from European Union member countries to the United States (the “Safe Harbor Agreement”). The Safer Harbor privacy principles are notice, choice, onward transfer, access, security, data integrity, and enforcement.

More information about the U.S. Department of Commerce’s Safe Harbor program can be found at <http://www.export.gov/safeharbor/>.

Scope

This Privacy Policy applies to all Personal Information received by Ultimate Software (including its Subsidiaries) in any format including electronic, paper, or verbal. For purposes of this Policy, “Personal Information” means any information collected by Ultimate Software that identifies or could be used by Ultimate Software to identify an individual.

Notice

How Personal Information is Collected

Web Visitors

Ultimate Software collects Personal Information about a visitor to our Web site only when the visitor chooses to provide such information. On certain pages, for example, a visitor has the opportunity to provide his/her personal information such as his/her name, company, address, phone number, and e-mail address. By supplying such information to Ultimate Software, a visitor can request details about Ultimate Software, including information about the company’s product line and investor information, or sign up for company-sponsored events or use the company’s support Web site.

Web Site / Cookies

In order to improve the content and format of our site, Ultimate Software uses Web site tracking software to automatically capture technical information that is then stored in our

server's log files. This information may include, but is not limited to, user domain, the type of Internet browser being used, which of our Web pages is visited, and the amount of time spent on our site.

In addition, some of Ultimate Software's Web pages may contain "cookies." A cookie is a small amount of data which our Web site stores on your computer, and which we can later retrieve. The cookie cannot be read by a site other than ours. We use cookies for a number of administrative purposes; for example, to store your preferences for certain kinds of information. No cookie will contain information that will allow anyone to contact you via telephone, e-mail, or any other means. You can monitor our use of cookies on your computer by setting your Web browser to inform you when cookies are set, or you can prevent the cookies from being set entirely. The "help" portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Please understand that if you disable the use of cookies on your computer, you may be unable to access certain portions or services on our Web sites.

Job Applicants and Employees

Ultimate Software collects Personal Information from its employees and job applicants for, among other things, legitimate human resource business reasons such as payroll administration, filling employment positions, maintaining accurate benefits records, meeting governmental reporting requirements, security, health and safety management, performance management, company network access, and authentication.

Customers

Ultimate Software collects Personal Information from our customers who use our software products. The information may be collected through our Intersourcing hosted services, or by members of our support team who provide support to licensed customers. The type of Personal Information collected is similar to the information collected under the "Job Applicants and Employees" paragraph, above.

Choice

Use of Your Personal Information

We use your Personal Information to provide you with the services which Ultimate Software is contractually obligated to provide to you, or to assist you in completing a transaction, or communicate with you about our products or services. We use Personal Information from Web site visitors to respond to any inquiries such visitors make to our Web site and to provide you with related information of interest to you. We do not sell or rent your Personal Information to third parties.

We may disclose your Personal Information if we are required to do so by law or we in good faith believe that such action is necessary to (1) comply with the law or with legal process; (2) protect and defend our rights and property; (3) protect against misuse or unauthorized use of our Web site; or (4) protect the personal safety or property of our

users or the public (among other things, this means that if you provide false information or attempt to pose as someone else, information about you may be disclosed as part of any investigation into your actions).

Other than as stated in this Privacy Policy, we will endeavor not to release your Personal Information to unknown or unaffiliated third parties, and we will not cross-reference your Personal Information with that of any other customer or entity.

Onward Transfer

Sharing of Your Personal Information

Ultimate Software may contract with third-party providers to perform certain functions on our behalf or to enhance our existing product and service offerings. Examples include providing marketing assistance, product, and service support.

These third parties may have access to your Personal Information only to the extent necessary to permit them to do their jobs, however, they are bound by confidentiality agreements before any information is provided to them, and they are restricted from using the information for other purposes.

Links to Non-Ultimate Software Web Sites and Third Parties

Ultimate Software's Web sites may contain links to third-party sites for your convenience and/or information. If you access those links, you will leave Ultimate Software's Web site and be re-directed to a third-party site. Ultimate Software does not control those sites or the privacy practices of those third-party sites, which may differ from Ultimate Software's privacy practices. We do not endorse or make any representations about third-party Web sites, and the personal data you choose to provide to third-party Web sites is not covered by this Privacy Policy. We encourage you to review the privacy policy of any Web site or company before submitting your Personal Information to them.

Access

Ultimate Software will take reasonable steps to ensure that your Personal Information is accurate, complete, and current, to its intended use. We provide individuals with reasonable access to the Personal Information that they provide to us, as well as the ability to review and correct such information.

To protect your privacy and security, we also take reasonable steps to verify your identity, before granting access to your Personal Information. In addition, we may limit or deny access to Personal Information where providing such access would be unreasonably burdensome or expensive in the circumstances, or as otherwise permitted by the Safe Harbor Agreement.

Security

To prevent unauthorized access or disclosure, to maintain data accuracy, and to allow only the appropriate use of your Personal Information, we utilize physical, technical, and administrative controls and procedures to safeguard the information we collect.

To protect the confidentiality, integrity, and availability of your Personal Information, Ultimate Software utilizes a variety of physical and logical access controls, firewalls, intrusion detection/prevention systems, network and database monitoring, anti-virus, and backup systems. We use encrypted sessions when collecting or transferring sensitive data through our Web sites.

We limit access to your Personal Information and data to those persons who have a specific business purpose for maintaining and processing such information. Ultimate Software's employees who have been granted physical access to your Personal Information will be made aware of their responsibilities to protect the confidentiality, integrity, and availability of that information and have been provided training and instruction on how to do so.

Data Integrity

Ultimate Software will take reasonable steps to ensure that Personal Information is accurate, complete, and current, to its intended use. Ultimate Software will only use Personal Information in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual.

Enforcement and Verification

Ultimate Software will conduct periodic assessments to validate its continued adherence to this Privacy Policy.

Where Ultimate Software has knowledge that one of Ultimate Software's employees or third parties is using or disclosing Personal Information in a manner contrary to this Policy, Ultimate Software will take reasonable steps to prevent or stop the use or disclosure. Ultimate Software holds its employees and agents accountable for maintaining the trust that our customers place in our company.

Contact Information

At any time you may contact Ultimate Software with questions or concerns about this Privacy Policy at privacy@ultimatesoftware.com. Written responses may also be submitted to:

The Ultimate Software Group
Attention: Director, Privacy and Compliance
2000 Ultimate Way
Weston, FL 33326

Dispute Resolution

Ultimate Software will investigate and attempt to resolve complaints and disputes regarding the use and disclosure of Personal Information in accordance with the principles contained in this Policy. Ultimate Software agrees to cooperate with the applicable European Union Data Protection Authority for disputes specific to Human Resource information received from the European Union. All other disputes that cannot be resolved between Ultimate Software and the complainant will be handled in accordance with applicable dispute resolution procedures through the American Arbitration Association, which are available for review at www.adr.org. We strongly encourage you to raise any complaints you may have with regard to this privacy policy and/or our implementation of this policy to us prior to proceeding to the arbitration procedure described in this paragraph.

Changes to This Privacy Policy

The practices described in this Policy are the current Personal Information protection policies as of July 15, 2007. Ultimate Software reserves the right to modify or amend this Policy at any time consistent with the requirements of the Safe Harbor Principles. Updates will be posted to this site.