

## **POLICY ON BIOMETRIC TECHNOLOGY**

This policy is intended to advise employees and temporary staff of the nature and extent any system in use by GBD International, Inc. (the "Company") uses information which may be considered biometric information or biometric identifiers subject to the Illinois Biometric Information Privacy Act ("BIPA"), 740 ILCS 14/1, et seq.

The Company uses a Paychex InVision iris recognition time clock for time entry and payroll purposes. During registration with the system, the InVision time clock uses video technology to take a picture and/or scan of an individual's iris (the colored portion of your eye surrounding the pupil). The InVision system then converts the image template and/or scan to a mathematical algorithm (unique number) that identifies an employee or temporary staff member. Only your unique number is then stored on the InVision time clock and/or in cloud storage. In addition, the unique number cannot be turned back into an image. This policy is applicable to the time management system in use by the Company.

### **Disclosure**

1. The Company will not disclose, redisclose or disseminate the unique number (the data derived from the picture and/or scan) to anyone other than the vendor providing the technology for the purposes identified above, unless required by law. The unique number assigned to each individual from the picture and/or scan is stored on the InVision time clock device and may also be stored in cloud storage.
2. The Company will not sell, lease, trade, or otherwise profit from the stored data (the unique number) derived from the employee's iris picture and/or scan; however, the Company may pay a vendor (s) for the technology or for services arising out of or relating to the technology utilized by the Company.

### **Retention and Destruction Guidelines**

Only the unique number derived from the iris picture and/or scan, which will be used in the time management system going forward, will be stored during the term of an employee's employment or a temporary staff's assignment with Company. Upon the termination of employment or assignment, an individual is moved to "inactive status" in the Company's payroll system and the unique numbers are deleted at the time an individual is moved to "inactive" status. This will occur no later than 30 days after termination of employment.

### **Storage, Transmission and Protection**

The Company shall use a reasonable standard of care to store, transmit and protect from disclosure the unique number derived from the employee's iris picture and/or scan. Such storage, transmission, and protection from disclosure shall be performed in a manner that is the same as the manner in which the Company stores, transmits and protects from disclosure confidential and sensitive information, such as account numbers, PINs, driver's license numbers and social security numbers.