SAPORITO FINISHING CO.'S BIPA POLICY, CONSENT AND RELEASE

Purpose

This Biometric Information and Security Policy ("Policy") defines Saporito Finishing Co.'s ("Saporito") policy and procedures for collection, use, safeguarding, storage, retention, and destruction of biometric data collected by Saporito and/or its vendors.

Saporito uses biometric identification systems for employee timekeeping with regard to payroll. Saporito and/or it vendor(s) collects, stores, and uses employee biometric data for the purpose of granting employees access to Saporito's timekeeping systems and to document employees' (i) clock in/out time(s); (ii) clock in/out location(s); and (iii) attempts/failures/errors in biometric data scans.

Policy

Saporito's policy is to protect and store biometric data in accordance with applicable standards and laws, including, but not limited to, the Illinois Biometric Information Privacy Act.

An individual's biometric data will not be collected or otherwise obtained by Saporito without prior written consent of the individual. Saporito will inform the employee of the reason his or her biometric information is being collected and the length of time the data will be stored.

Definition

Biometric data mean personal information stored by Saporito and/or its vendors(s) about an individual's physical characteristics that can be used to identify that person. Biometric data can include fingerprints, voiceprints, a retina scan, scans of hand or face geometry, or other data.

Procedure

Saporito and/or its vendor(s) collects, stores, and uses biometric data for the purposes of giving employees access to Saporito's timekeeping systems and for maintaining accurate records of employee time.

Prior to collecting biometric data, Saporito will obtain the consent of the employee. A sample consent form is included with this policy statement.

Saporito will not sell, lease, trade, or otherwise profit from an individual's biometric data. Saporito will not disclose biometric data unless (a) consent is obtained, (b) disclosure is required by law, or (c) disclosure is required by a subpoena.

Saporito will store, transmit and protect biometric data using a reasonable standard of care and in a manner that is the same as or exceeds the standards followed in maintaining other confidential and sensitive information.

Saporito will permanently destroy an employee's biometric data from Saporito's systems, or the systems of Saporito's vendor(s) within a reasonable time following the employee's termination from Saporito.

In the event Saporito begins collecting biometric data for any additional purpose, Saporito will update this procedure.

A copy of this policy publicly posted at Saporito Finishing's main office.