



## **Biometric Information Privacy Policy**

### Biometric Data Defined

As used in this policy, “biometric data” means any biological characteristics of a person, or information based upon such a characteristic, including characteristics such as those defined as “biometric identifiers” and “biometric information” under the Illinois Biometric Information Privacy Act, 740 ILCS 14/1, et seq.

“Biometric identifier” means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. Biometric identifiers do not include writing samples, written signatures, photographs, human biological samples used for valid scientific testing or screening, demographic data, tattoo descriptions, or physical descriptions such as height, weight, hair color, or eye color.

“Biometric information” means any information, regardless of how it is captured, converted, stored, or shared, based on an individual’s biometric identifier used to identify an individual. Biometric information does not include information derived from items or procedures excluded under the definition of biometric identifiers.

### Collection, Storage, Use and Transmission of Biometric Data

**Purpose:** Pronto Freight Ways, LLC, including its affiliates, (collectively, the “Company”) uses a biometric time clock that collects fingerprints and/or handprints for the purpose of registering employees in and out of work.

**Collection:** At the time of initial enrollment (or reenrollment, if required) on the biometric time clock, an employee will be asked to either give or deny consent to the collection of the biometric data. By giving consent, you agree to the collection, storage, use, transmission, and disclosure of that data as described herein. If you deny consent, your biometric data will not be collected or used to register your time in and out.

**Storage:** The biometric data stored will remain stored until such a time as the employee’s employment ends, the employee opts in a written request to deny consent,

or within three years of the employee's last interaction with the Company, whichever occurs first, at which time the biometric data stored will be destroyed. The Company will use a reasonable standard of care to store, transmit, and protect from disclosure all biometric data collected or possessed by the Company. The storage, transmission, and protection from disclosure shall be performed in a manner that is the same as or more protective than the manner in which the Company stores, transmits, and protects other confidential and sensitive information.

Use: The biometric data provided will only be used in the capturing of an employee's in and/or out punches.

Transmission: The biometric data will be used solely as a marker for in and out punches on the time clock and as such will only be transmitted from the time clock to the server for time keeping records, as well as to the Company's third-party technology vendor(s), which is currently ADP, and any data processing used by the Company's third-party technology vendor(s).

For further information, contact your Human Resources representative.