

# BIOMETRIC HANDLING POLICY: INFORMATION ON THE COLLECTION, RETENTION, AND DESTRUCTION OF EMPLOYEE BIOMETRIC INFORMATION

## POLICY OVERVIEW

### 1. PURPOSE

- 1.1. This Biometric Handling Policy ("Policy") defines Dywidag's policy and procedures for collection, use, safeguarding, storage, retention, and destruction of biometric data collected by Dywidag.
- 1.2. This Policy serves as notice that Dywidag uses biometric identification systems for employee timekeeping with regard to payroll. The use of this biometric data, such as fingerprints or hand scan, ("Biometric Identifier") will solely be used for employee time and attendance tracking purposes. Dywidag collects, stores, and uses employee Biometric Identifier for the purpose of giving employees secure access to Dywidag'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 Identifier scans.
- 1.3. All collection, storage, use, and destruction of Biometric Identifiers complies with applicable privacy legislation in the United States (including state laws such as BIPA in Illinois, CUBI in Texas, and CCPA in California) and within Canada (PIPEDA, provincial privacy laws).

### 2. POLICY STATEMENT

- 2.1. This Policy replaces and supersedes all previous policies related to biometric information. Dywidag reserves the right to amend this Policy at any time, without notice. Dywidag may expand its use of Biometric Identifier in the future.
- 2.2. In the event Dywidag begins collecting Biometric Identifier for any additional purpose, Dywidag will update this Policy.
- 2.3. A copy of this document can be found at any time upon request and on Dywidag's website at: [www.https://dywidag.com/](https://dywidag.com/).
- 2.4. This Policy will be review regularly and updated for regulatory changes.

### 3. DEFINITION OF BIOMETRIC IDENTIFIER

- 3.1. Biometric Identifier means personal information stored by Dywidag about an individual's physical characteristics that can be used to identify that person. Biometric Identifier specifically includes fingerprints.
- 3.2. As technology and systems advance, Biometric Identifier may also include voiceprints, retina or iris scan, or scan of hand or face geometry.

### 4. POLICY

- 4.1. Dywidag's policy is to protect and store Biometric Identifier in accordance with applicable standards and laws including, but not limited to, the Illinois Biometric

Information Privacy Act.

- 4.2. An individual's Biometric Identifier will not be collected or otherwise obtained by Dywidag without prior written consent of the individual. Dywidag 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.
- 4.3. Dywidag will not sell, lease, trade, or otherwise profit from an individual's Biometric Identifier. Biometric Identifier will not be disclosed Dywidag unless (i) consent is obtained, (ii) required by law, or (iii) required by valid legal subpoena.
- 4.4. Biometric Identifier will be stored using a reasonable standard of care for Dywidag's industry and in a manner that is the same or exceeds the standards used to protect other confidential and sensitive information held by Dywidag.
- 4.5. Dywidag will destroy Biometric Identifier within a reasonable period of time of when the purpose for obtaining or collecting such data has been fulfilled. Generally, this means no later than two years of an employee's termination of employment.
- 4.6. All affected employees, active or non-active, have the right to access, correct or otherwise request deletion of their Biometric Identifier through written request to their Dywidag HR representative.
- 4.7. Dywidag will respond to security incidents involving biometric data, as required by laws or regulations.
- 4.8. All affected employees located within Canadian provinces (notably in Quebec) may may ask for a privacy impact assessment and will be offered a non-biometric alternative for identification and timekeeping purposes when requested.

## 5. PROCEDURE

- 5.1. Prior to collecting an employee's Biometric Identifier, Dywidag will obtain the consent of the employee.
- 5.2. All affected employees will be required to execute a Biometric Waiver From, which provides express consent, and acknowledges receipt and agreement to the terms of this Policy.
- 5.3. Employees will have their Biometric Identifier registered.
- 5.4. When an employee uses a biometric timeclock system, they are identified by their Biometric Identifier.
- 5.5. Dywidag will store, transmit, and protect Biometric Identifier using the same standard of care and security controls as it provides other confidential and sensitive information in its possession.
- 5.6. Biometric Identifier is securely stored on a network domain controller. No Dywidag employee will have direct access to Biometric Identifier.