



BIOMETRIC INFORMATION SECURITY POLICY

As a means to provide a secure and safe work environment, Plymouth Place collects biometric information from employees and may utilize that information to identify employees, to control access to the Plymouth Place's facilities, to track attendance and employee temperatures. Plymouth Place uses facial identification time clocks at certain work sites through which an employee's daily face photograph is scanned for time and attendance purposes. Plymouth Place currently uses OnShift as its time and attendance tracking system manufacturer ("Vendor 1") and Paylocity as payroll vendor ("Vendor 2").

Plymouth Place also uses a personnel management solution kiosk for employee check-in and temperature verification capabilities. The kiosk is also programmed for facial identification for ease of reference. Plymouth Place currently uses CTC Technology as its vendor for this personnel management solution ("Vendor 3"). Vendors 1, Vendor 2 and Vendor 3 are collectively referred to as "Vendors." In accordance with Illinois law, Plymouth Place has implemented this policy relating to the retention, collection, disclosure and destruction of biometric information. All employees whose biometric information is collected will be required to sign an Employee Consent Form upon hire and as requested thereafter by Plymouth Place.

The terms "biometric data" and "biometric information" as used in this Policy and Employee Consent Form are intended to have the same definition provided in the Illinois Biometric Information Privacy Act, 740 ILCS §14/1, et seq.

Purpose for Collection of Biometric Data

Plymouth Place, through its Vendors, collects, stores, and uses biometric data only for the purpose of employee identification, fraud prevention, the recording and tracking of an employee's time and attendance, and helping to protect the health and safety of employees by preventing anyone with a temperature of 100.4 or greater from entering a facility. For more information about the Vendors' timeclock and personnel management solution kiosk, please visit:

<https://www.onshift.com/>

Disclosure

Plymouth Place will not disclose or disseminate any biometric data to any third party, including its Vendors, unless it obtains the employee's written consent to such disclosure or dissemination or as required or authorized by law. Plymouth Place will never sell, lease, trade, or otherwise profit from a person's or a customer's biometric identifier or biometric information.

Retention Schedule and Destruction of Biometric Information

Plymouth Place, through its Vendors, will retain employee biometric information collected pursuant to this Policy until such time as employment is terminated or Plymouth Place discontinues its use of biometric information pursuant to this Policy. Upon termination of employment or discontinued use of timeclock or personnel management solution kiosk, Plymouth Place will notify its Vendors. Once Plymouth Place provides such notice, both Plymouth Place and the Vendors will automatically destroy any biometric information in Plymouth Place or the Vendors' possession. As such, an employee's biometric data will be permanently destroyed immediately after thirty (30) days have passed since the employee's separation from employment.



Biometric Data Safeguards

Plymouth Place and its Vendors have and will take all appropriate steps to store, transmit and protect from disclosure all biometric identifiers and biometric information. Plymouth Place and its Vendors use appropriate information security safeguards designed to protect biometric data when it is being collected, stored and transmitted. These safeguards include firewalls, physical and digital security measures, encryption, access restrictions, password authorization, system logging, and file backup. Plymouth Place only has access to encrypted biometric data as required to fulfill the necessary job functions.

BIOMETRIC INFORMATION PRIVACY POLICY EMPLOYEE ACKNOWLEDGEMENT AND CONSENT FORM

The employee named below acknowledges that he/she has been advised and understands that Plymouth Place currently uses OnShift as its time clock manufacturer ("Vendor 1") and Paylocity as its payroll vendor ("Vendor 2") and CTC Technology as its personnel management solution vendor ("Vendor 3"). Vendors 1, Vendor 2 and Vendor 3 are collectively referred to as "Vendors." The employee named below has been notified that Plymouth Place, through its Vendors, collects, stores, and uses biometric data only for the purpose of employee identification, fraud prevention, the recording and tracking of an employee's time and attendance, and helping to protect the health and safety of employees by preventing anyone with a temperature of 100.4 or greater from entering a facility.

By signing this form, the employee acknowledges that he/she has received the Biometric Information Privacy Policy and that he/she voluntarily consents to the collection, retention, disclosure and destruction of his/her biometric data and biometric information by Plymouth Place through its Vendors. The employee may revoke this consent by notifying Human Resources in writing.

Employee Signature

Date