

Biometric Data Policy and Release

1. PURPOSE

- 1.1 This Release defines THE STANDARD MARKET, LLC'S ("STANDARD MARKET") policies and procedures for collection use, safeguarding, storage, retention, disclosure and destruction of Biometric Data collected by ADP, on behalf of STANDARD MARKET.
- 1.2 STANDARD MARKET has engaged ADP to provide services in connection with its employee timekeeping system that is used for employee identification, fraud prevention and pre-employment hiring purposes.
- 1.3 STANDARD MARKET utilizes this information to ensure accurate timekeeping, and as an added security measure to decrease or eliminate the possibility of one employee clocking in or out for another employee in violation of STANDARD MARKET'S policies.
- 1.4 This policy is available to the public and may be found in the employee handbook or online at [BIPA Information \(If Applicable\)](#)

2. TYPES OF INFORMATION COLLECTED AND STORED

- 2.1 ADP's system utilizes finger and/or hand scan technology to create a unique identifier. During the enrollment process, the timeclock attachment scans a portion of the employee's fingertip, and stores and uses an encrypted mathematical representation of that portion of the fingertip. The fingerprint, handprint, fingertip and encrypted mathematical representation of that portion of the fingertip shall individually and/or collectively be referred to herein as the "Biometric Data."
- 2.2 STANDARD MARKET does not itself disclose, retain or store Biometric Data.
- 2.3 ADP's biometric timeclock attachments do not collect, store, or use an actual fingerprint.

3. POLICY STATEMENT

- 3.1 This Release replaces and supersedes all previous policies related to Biometric Data.
- 3.2 In the event STANDARD MARKET begins collecting your Biometric Data for any additional purpose not outlined in this Release, STANDARD MARKET will update this Release and provide the appropriate notice to you.
- 3.3 In the event STANDARD MARKET learns that any entity working on behalf of STANDARD MARKET, such as ADP, begins collecting your Biometric Data for any additional purpose not outlined in this Release, STANDARD MARKET will update this Release and provide the appropriate notice to you.
- 3.4 Execution of this Release is a condition of your employment or continued employment, as applicable.
- 3.5 Biometric data will be used every day that you report to work and clock in to, or out of, the ADP timekeeping system used by STANDARD MARKET.

4. SECURITY MEASURES

- 4.1 STANDARD MARKET will not disclose your Biometric Data to any third party other than ADP. ADP may give limited access of your Biometric Data to its own

vendors for the sole purpose of facilitating the timekeeping system for which the Biometric Data is used. All third parties with whom your Biometric Data is shared by ADP are held to strict privacy standards and execute contracts prohibiting them from copying, obtaining or otherwise possessing your Biometric Data. By signing this release you acknowledge and consent to STANDARD MARKET and ADP sharing your Biometric Data with third parties consistent with the provisions set forth in this Section 4.1.

- 4.2 ADP has assured STANDARD MARKET that it stores your Biometric Data using a reasonable standard of care, and utilizes security methods that are the same as, or exceed, the standards ADP uses to protect its own confidential and sensitive information. To the extent STANDARD MARKET is deemed to possess or store your Biometric Data, STANDARD MARKET uses commercially acceptable information security controls, and utilizes security methods that are the same as, or exceeds, the standards STANDARD MARKET uses to protect its own confidential and sensitive information.

5. RETENTION SCHEDULE

5.1 Biometric Data will be retained until the first of the following occurs:

- i. The initial purpose for collecting or obtaining Biometric Data has been satisfied, such as the termination of the employee's employment with STANDARD MARKET, or the employee moves to a role within STANDARD MARKET for which Biometric Data is not used (*e.g.* the employee moves from a non-exempt to an exempt position); OR
- ii. Within three years of the employee's last interaction with STANDARD MARKET.

6. CONSENT TO COLLECTION, DISCLOSURE AND STORAGE OF BIOMETRIC DATA