



BIOMETRIC INFORMATION PRIVACY POLICY – CENTEREDGE

DEFINITIONS:

- **Biometric Identifiers.** For purposes of this policy, Biometric Identifiers are finger scans of employees, which are used to create Biometric Templates. 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 Templates.** Biometric Templates are digitally converted representations of geometric measurements of the hand or finger created by a device, or application. Biometric Templates are created when consenting employees present their finger, hand or photograph as part of creating point of sale login information and override access in the point of sale at Santa's Village, LLC. Biometric Templates are not Biometric Identifiers, as they cannot be reverse engineered to identify or recreate an image of an Employee's finger, hand or face.

- **Biometric Information.** Biometric Information is any information, regardless of how it is captured, converted, stored, or shared, that is based on an individual's fingerprint, or scan of hand and is used to identify an individual. Biometric Templates are considered Biometric Information for the purposes of this policy.

COLLECTION AND STORAGE OF BIOMETRIC INFORMATION; PURPOSE OF COLLECTION, STORAGE, AND USE :

CenterEdge (The Point of Sale (POS) Company for Santa's Village, LLC. (SV)) hosts Employee data for SV. Biometric Templates in CenterEdge enable Employees to login and override transactions when login or approvals are needed, using a scan of the employee's finger to act as their login credential and authorization. When you use a biometric feature on the POS, your biometric information is collected, and Employee Biometric Templates are created from selected aspects of your Biometric Identifiers, in this case, the Templates are generated from scans of your fingers. These Templates are stored in the SV controlled part of CenterEdge's database. Biometric Identifiers are not retained on devices after an Employee Biometric Template is generated. Biometric Templates stored in CenterEdge can only be removed from storage by authorized Client personnel with access to such areas within the CenterEdge software. Such personnel can delete Templates at in accordance with SV policies. Biometric Templates can be removed from the SV's POS database by authorized SV POS system users utilizing the CenterEdge software. Biometric Templates from CenterEdge software are included in production backups of the SV databases.

LENGTH OF COLLECTION, STORAGE, AND USE; DESTRUCTION OF BIOMETRIC INFORMATION/TEMPLATES:

SV is responsible for deleting any Employee data, including Biometric Information, when it is no longer needed. For example, when an employment relationship ends, SV will terminate the Employee through the CenterEdge software by changing the Employee's status and deleting (permanently destroying) the Biometric Templates (if applicable) and the SV database in POS. Seasonal employees will be terminated through the CenterEdge software at the end of every season.

MAINTENANCE AND STORAGE OF BACKUPS AND ARCHIVES:

Automated CenterEdge backups of active SV databases occur on an incremental daily and weekly basis. These production backups are retained for a maximum of one year.

SECURITY OF BIOMETRIC INFORMATION IN PAYCOR SYSTEMS:

CenterEdge Software takes care with all Employee data and implements reasonable administrative, technical, and physical safeguards to protect Employee data from unauthorized access, use, or loss. Access to Employee information is granted only to those individuals with a valid reason to use such information in support of SV. In addition, the hosting environment and backup storage are likewise protected from unauthorized access by physical and digital security measures. Additionally, POS stores, transmits and protects from disclosure all Biometric Information using reasonable care, and in compliance with industry standards applicable to such data. CenterEdge and/or SV will not disclose, re-disclose, or otherwise disseminate your Biometric Information without your express consent. CenterEdge and/or SV will only provide or use your Biometric Information for the purposes described herein. CenterEdge and/or SV will not sell, lease, trade or otherwise profit from your Biometric Information.

INFORMED CONSENT:

By signing this document, I understand the Santa’s Village, LLC. Biometric Information Privacy Policy and consent to CenterEdge and Santa’s Village, LLC collecting, capturing, obtaining, and storing my biometric identifiers and/or biometric information for the purposes of my employment relationship, including point of sale access, for the duration of my employment with Santa’s Village, LLC, in accordance with the above policy guidelines. I further consent to the disclosure and redisclosure of my biometric information and biometric identifiers by and between Santa’s Village, LLC and CenterEdge. I understand that my execution of this written release/consent is a condition of my employment. Should I be under the age of 17 at the time of this agreement, my parent/guardian will confirm consent on my behalf as a minor in addition to my signature below. Should I (or responsible parent/guardian) have any questions regarding the policy or consent to, I will seek assistance from the Human Resources Department immediately prior to signing.

Employee Signature: _____

Employee Printed Name: _____

Parent/Guardian Signature for those under 17 yrs old: _____

Date: _____