



BIOMETRIC INFORMATION PRIVACY POLICY - PAYCOR

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 timekeeping clock, device, or application ("Time Clocks"). Biometric Templates are created when consenting employees present their finger or photograph as part of registering for a Time Clock implemented 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 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:

Paycor (The Payroll Company for Santa's Village, LLC. (SV)) hosts Employee data for SV. Time Clocks enable Employees to record the start and end to their assigned work shifts, including documenting other activity data, such as break time taken, using a scan of the employee's finger to "clock in" and "clock out". When you use a biometric feature on Time Clocks with Paycor Software, 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 the scans of the your fingers. These Templates are stored in the SV controlled part of Paycor's database and (in the case of hand or finger based Biometric Templates) in Time Clocks. Biometric Identifiers are not retained on Time Clocks after an Employee Biometric Template is generated. Biometric Templates stored on a Time Clock can only be removed from Time Clock storage by authorized Client personnel with access to such Time Clocks. Such personnel can delete Templates at the Time Clock in accordance with SV policies. Biometric Templates can be removed from the SV's Paycor database by authorized SV Paycor system users utilizing Paycor's software. Biometric Templates from Paycor software are included in production backups of Paycor 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 Paycor software by changing the Employee's status

and deleting (permanently destroying) the Biometric Templates from the Time Clock (if applicable) and the SV database in Paycor. Seasonal employees will be terminated through the Paycor software at the end of every season.

MAINTENANCE AND STORAGE OF BACKUPS AND ARCHIVES:

Automated Paycor backups of active SV databases occur on an incremental daily and weekly basis. These production backups are retained for a maximum of one year. Paycor archives databases for clients (IE:SV) that are no longer using the Paycor service. As part of the archive process, all Biometric Information is deleted.

SECURITY OF BIOMETRIC INFORMATION IN PAYCOR SYSTEMS:

Paycor takes care with all Employee data and implements reasonable administrative, technical, and physical safeguards to protect Employee data from unauthorized access, use, or loss. Biometric Templates are transmitted with encryption in place. At Paycor, access to Employee information is granted only to those individuals with a valid reason to use such information in support of SV. In addition, Paycor's hosting environment and backup storage are likewise protected from unauthorized access by physical and digital security measures. Biometric Templates are encrypted when in storage. Additionally, Paycor stores, transmits and protects from disclosure all Biometric Information using reasonable care, and in compliance with industry standards applicable to such data. Paycor and/or SV will not disclose, re-disclose, or otherwise disseminate your Biometric Information without your express consent. Paycor and/or SV will only provide or use your Biometric Information for the purposes described herein. Paycor 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 Paycor 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 continuous timekeeping, 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 Paycor. 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: _____