



Biometric Information Privacy Policy

Aspire Bakeries has instituted the following biometric information privacy policy:

Biometric Data Defined

As used in this policy, biometric data includes "biometric identifiers" and "biometric information" as defined in the Illinois Biometric Information Privacy Act, 740 ILCS § 14/1, et seq. "Biometric identifier" means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. 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 identifiers do not include information captured from a patient in a health care setting or information collected, used, or stored for health care treatment, payment, or operations under the federal Health Insurance Portability and Accountability Act of 1996.

"Biometric information" means any information, regardless of how it is captured, converted, stored, or shared, based on an individual's biometric identifier used to identify an individual. Biometric information does not include information derived from items or procedures excluded under the definition of biometric identifiers.

Although Aspire Bakeries denies that it collects, stores and uses biometric identifiers or biometric information, Aspire Bakeries treats information collected, stored and used in connection with Aspire Bakeries time and attendance system and software as if it is biometric data for purposes of ensuring its compliance with the Illinois Biometric Information Privacy Act, 740 ILCS § 14/1.

Purpose and Method for Collection of Biometric Data

Aspire Bakeries, its vendors, and/or the licensor of Aspire Bakeries time and attendance system and software collect, store, and use biometric data solely for employee identification and fraud prevention.

Aspire Bakeries timeclocks are computer-based systems that scan a portion of an employee's finger for purposes of identification for timekeeping purposes. The computer system extracts unique data points and creates a unique mathematical representation used to verify the employee's identity, for example, when the employee arrives at or departs from the workplace.



Disclosure and Authorization

To the extent that Aspire Bakeries, its vendors, and/or the licensor of Aspire Bakeries time and attendance system and software collect, capture, or otherwise obtain biometric data relating to an employee, Aspire Bakeries must first:

- a. Inform the employee in writing that Aspire Bakeries, its vendors, and/or the licensor of Aspire Bakeries time and attendance system and software are collecting, capturing, or otherwise obtaining the employee's biometric data, and that Aspire Bakeries is providing such biometric data to its vendors and the licensor of Aspire Bakeries time and attendance system and software;
- b. Inform the employee in writing of the specific purpose and length of time for which the employee's biometric data is being collected, stored, and used; and
- c. Receive a written release signed by the employee (or his or her legally authorized representative) authorizing Aspire Bakeries, its vendors, and/or the licensor of Aspire Bakeries time and attendance system and software to collect, store, and use the employee's biometric data for the specific purposes disclosed by Aspire Bakeries, and for Aspire Bakeries to provide such biometric data to its vendors and the licensor of Aspire Bakeries time and attendance system and software.

Aspire Bakeries, its vendors, and/or the licensor of Aspire Bakeries time and attendance system and software will not sell, lease, trade, or otherwise profit from employees' biometric data; provided, however, that Aspire Bakeries vendors and the licensor of Aspire Bakeries time and attendance system and software may be paid for products or services used by Aspire Bakeries that utilize such biometric data.

Disclosure

Aspire Bakeries will not disclose or disseminate any biometric data to anyone, other than its vendors and the licensor of Aspire Bakeries time and attendance system and software, providing products and services using biometric data without/unless:

- a. First obtaining written employee consent to such disclosure or dissemination;
- b. The disclosed data completes a financial transaction requested or authorized by the employee;
- c. Disclosure is required by state or federal law or municipal ordinance; or



- d. Disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

Retention Schedule

Aspire Bakeries shall retain employee biometric data only until, and shall request that its vendors and the licensor of Aspire Bakeries time and attendance system and software permanently destroy such data when, the first of the following occurs:

- a. The initial purpose for collecting or obtaining such biometric data has been satisfied, such as the termination of the employee's employment with Aspire Bakeries, or the employee moves to a role within Aspire Bakeries for which the biometric data is not used; or
- b. Within 3 years of the employee's last interaction with Aspire Bakeries.

Data Storage

Aspire Bakeries shall use a reasonable standard of care to store, transmit and protect from disclosure any paper or electronic biometric data collected. Such storage, transmission, and protection from disclosure shall be performed in a manner that is the same as or more protective than the manner in which Aspire Bakeries stores, transmits and protects from disclosure other confidential and sensitive information, including personal information that can be used to uniquely identify an individual or an individual's account or property, such as genetic markers, genetic testing information, account numbers, PINs, driver's license numbers and social security numbers.