BIOMETRIC INFORMATION PRIVACY POLICY

CEDA has instituted the below 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.

"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 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.

Purpose for Collection of Biometric Data

CEDA, its vendors, and/or the licensor of CEDA's time and attendance software collect, retain, and use biometric data solely for identification and fraud prevention as related to time management and compensation of non-employee temporary workers, employees, and/or independent contractors. CEDA will not disclose or disseminate any biometric information to anyone, unless disclosure is required by applicable federal, state, or local law, or required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

Retention Schedule

CEDA shall retain biometric data only until the date of termination of the non-employee temporary workers, employees, and/or independent contractors from CEDA, which is a pre-set setting in CEDA's time and attendance software. The reason for said retention time frame is to satisfy one of the initial purposes of collecting said biometric data, namely to ensure appropriate compensation.

Data Storage

CEDA 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 CEDA 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.

<u>Updates</u>

In the event biometric data is collected for an additional purpose, CEDA will update this policy.