

LIPARI FOODS

BIOMETRIC INFORMATION PRIVACY POLICY

Lipari Foods has instituted the following policy related to the information that is collected and transmitted to Kronos (our payroll provider), as a result of our use of Kronos' biometric timeclocks.

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 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.

Collection of Biometric Data

Lipari Foods, Kronos and/or the licensor of Kronos time and attendance software will collect, store, and use biometric data from employee to be used solely for employee identification, fraud prevention, and pre-employment hiring purposes.

To the extent that Lipari Foods, and/or the licensor of the Kronos' time and attendance software to collect, capture, or otherwise obtain biometric data relating to an employee, Lipari Foods must:

- a. Inform the employee in writing that biometric data is being collected, stored, and used and that Lipari Foods is providing such biometric data to Kronos, and the licensor of Kronos' time and attendance software;
- b. Indicate the specific purpose(s) for collecting the biometric data and length of time for which it is being collected, stores, and used;
- c. Receive a written release signed by the employee, authorizing Lipari Foods, Kronos and/or the licensor of Lipari Foods' time and attendance software to collect, store, and retain the employee's biometric data for the specific purpose to be utilized by the timeclocks, and authorizing Lipari Foods to provide such data to Kronos and the licensor of Kronos time and attendance software.

Lipari Foods, Kronos, and/or the licensor of the Kronos time and attendance software will not sell, lease, trade, or otherwise profit from employees' biometric data.

Disclosure and Authorization

Lipari Foods will not disclose or disseminate any biometric data to any person or entity other than Kronos and the licensor of the Kronos' time and attendance software without/unless:

- a. First obtaining written employee consent;
- b. The disclosed information completes a financial transaction 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.

Retention Schedule

Lipari Foods and Kronos will retain employee's biometric data only until the employee is terminated in the Company's timekeeping system, or has otherwise discontinued using a biometric timeclock, at which time the attendance software will destroy such data.

Data Storage

Lipari Foods shall use a reasonable standard of care to store, transmit and protect from disclosure any paper or electronic biometric data collected, and shall store, transmit, and protect from disclosure all biometric data in a manner that is the same as or more protective than the manner in which Lipari Foods stores, transmits, and protects 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 account numbers, PINs, driver's license numbers and social security numbers.

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ACKNOWLEDGEMENT

The employee named below has been advised and understands that the Company, its vendors, and/or the licensor of the Company's time and attendance software collect, retain, and use biometric data for the purpose of identifying employees and recording time entries when utilizing the Company's biometric timeclocks or timeclock attachments. Biometric timeclocks are computer-based systems that scan an employee's finger for purposes of identification. 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.

The Illinois Biometric Information Privacy Act, 740 ILCS 14/1, et seq. ("BIPA"), regulates the collection, storage, use, and retention of "biometric identifiers" and "biometric information." "Biometric identifier" means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. "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.

The employee understands that he or she is free to decline to provide biometric identifiers and biometric information to the Company, its vendors, and/or the licensor of the Company's time and attendance software without any adverse employment action. The employee may revoke this consent at any time by notifying the Company in writing.

The undersigned employee acknowledges that he/she has received the attached Biometric Information Privacy Policy, and that he/she voluntarily consents to the Company's, its vendors', and/or the licensor of the Company's time and attendance software's collection, storage, and use of biometric data through a biometric timeclock, including to the extent that it utilizes the employee's biometric identifiers or biometric information as defined in BIPA, and voluntarily consents to the Company providing such biometric data to its vendors, and/or the licensor of the Company's time and attendance software.

Employee Name (Print)

Employee Signature

Date