

Paycor.

Biometric Information Policy

1. PURPOSE

Paycor Incorporated ("Paycor") provides its business clients ("Clients") products and services designed to increase efficiency and compliance in the building and managing a Client's workforce. Some Clients use Paycor products and services for the purposes of authenticating and recording the activities of individuals employed or contracted by Client ("Employees") include the processing of some Biometric Information about Employees. Clients are responsible for providing Employees notice of Client use of Biometric Information, to include providing Employees notice of a Client's use of Biometric Information on Paycor systems and obtaining Employee consent to the same.

This Biometric Information Policy sets forth Paycor's policy for processing Biometric Information in support of its Clients and complying with applicable statutes and regulations. This policy defines the retention schedule and guidelines for destruction of Biometric Information as well as outlining the storage and maintenance of such information. This policy is intended to assist Clients in meeting their disclosure requirements under applicable laws and is not legal advice. Clients should contact legal counsel for clarification and/or advice regarding laws and regulations.

2. POLICY

Relevant Definitions

- **Biometric Identifiers.** For purposes of this policy, Biometric Identifiers are finger scans of Client 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 Paycor biometric time clocks. Biometric Templates are created when consenting Client employees present their finger as part of registering for Paycor biometric time clocks implemented at Client sites. Biometric Templates are not Biometric Identifiers, as they cannot be reverse engineered to identify or recreate an image of an Employee's finger.
- **Biometric Information.** Biometric Information is any information, regardless of how it is captured, converted, stored, or shared, that is based on an individual's retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry and is used to identify an individual. Biometric Templates are considered Biometric Information for the purposes of this policy.

Creation and Storage of Biometric Information

Paycor hosts Employee data for its Clients, including Clients which use Paycor's Perform Time clock software. Perform 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. When Clients use biometric time clocks with Perform Timesoftware, Employee Biometric Templates are created from selected aspects of an Employee Biometric Identifiers. These Templates are stored in time clocks and in the Client-controlled part of Paycor's database. Biometric Identifiers are not retained on time clocks after an Employee Biometric Template is generated.

Biometric Templates can only be removed from time clock storage by authorized Client personnel with access to such clocks. Such personnel can delete Templates at the time clock in accordance with Client policies. Biometric Templates can be removed from the Client's Paycor database by authorized Client Paycor system users utilizing Paycor's software. It is solely the prerogative and responsibility of Clients in possession of any Paycor time clocks to delete Biometric Templates from the time clocks and when applicable, Paycor Client databases. Biometric Templates from Paycor software are included in production backups of Paycor Client databases.

Routine Maintenance of Biometric Information

Clients are responsible for deleting any Employee data, including Biometric Information, when it is no longer needed. For example, when an employment relationship ends, the Client should terminate the Employee through the Paycor software by changing the Employee's status and deleting the Biometric Templates from the time clock and the Client's database in Paycor.

Maintenance and Storage of Backups and Archives

Automated Paycor backups of active Client databases occur on an incremental daily and weekly basis. These production backups are retained for a maximum of one year. Paycor archives Client databases 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 Paycor Clients. 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 will not disclose, re-disclose, or otherwise disseminate your Biometric Information without your express consent. Paycor will only provide or use your Biometric Information for the purposes described herein. Paycor will not sell, lease, trade or otherwise profit from your Biometric Information.

3. ADDITIONAL INFORMATION

Questions regarding Paycor's privacy practices, including this policy, can be directed to:

Email

privacy@paycor.com

Mail

Paycor Inc.
4811 Montgomery Road
Cincinnati, OH 45212

Questions regarding any Client's privacy practices, including its use of biometrics, should be directed to the respective Paycor Client. Paycor cannot disclose the identities of its Clients nor comment on a Client's privacy practices, including biometric policies.