



## **Biometric Information Privacy Policy**

Northern Glass, Inc. collects certain biometric data from employees. This policy explains what information Northern Glass, Inc. collects, how this information is used, how it is stored, safeguarded, retained, and disposed of.

### **Biometric Data Collected by Northern Glass, Inc.**

“Biometric data” means personal information stored by Northern Glass, Inc. regarding an individual’s physical characteristics that can be used to identify a person, such as fingerprints, voiceprints, facial shape, or scan of hand or face geometry.

Northern Glass, Inc. collects, stores, and uses fingerprint data to give employees access to its time and attendance system via scanners used to log into electronic time clock.

Northern Glass, Inc. also issues smartphones and laptop computers that collect, store and use fingerprint data to allow users to log into their devices. Use of this technology is optional. If you do not wish to use fingerprint/facial recognition features, you may instead log in using a secure password.

### **Consent to Collection**

An individual’s biometric data will not be collected or otherwise obtained by Northern Glass, Inc. without prior written consent of the individual. Northern Glass, Inc. will inform the individual of the reason for collecting any biometric information, and of the length of time the data will be stored. Consent to collection of biometric data may be required as a condition of continued employment for employees who are required to use systems that use biometric authentication technology.

### **Privacy of Biometric Data**

Northern Glass, Inc. stores all biometric data in accordance with applicable standards and laws.

Northern Glass, Inc. will not sell, lease, trade, or otherwise profit from an employee’s biometric data.

An employee’s biometric data will not be disclosed, redisclosed or disseminated unless the employee (or the employee’s legally-authorized representative) consents, the disclosure or redisclosure is necessary to complete a financial transaction requested or authorized by the employee or their legal representative, the disclosure is required by law, or the disclosure is required by a valid warrant or subpoena. Biometric data associated with the time and attendance system may be transmitted and stored via systems operated, maintained, and controlled by Workwell Technologies, Inc.

Biometric data will be stored, transmitted, and protected using a reasonable standard of care for Northern Glass, Inc.’s industry, in a manner that is the same as or that exceeds the standards of care used to protect



other confidential information held by Northern Glass, Inc.. This includes, among other things, restricting access to biometric data to authorized Northern Glass, Inc. employees or vendors who have a business need to access the information, and using reasonable technological means to prevent unauthorized access to the information.

#### **Destruction of Biometric Data**

Northern Glass, Inc. will permanently delete or destroy any biometric data when the initial purpose for obtaining or collecting the data has been fulfilled. Biometric data will be deleted from Northern Glass, Inc.'s timekeeping and door access systems promptly after an employee's separation from employment with Northern Glass, Inc..

Biometric data used to log into Northern Glass, Inc. issued laptops or mobile devices will be permanently deleted from the device issued to you if the device is returned to Northern Glass, Inc., unless it is expected that the device will be re-issued to you, e.g., after software updates or repair, or unless Northern Glass, Inc. determines that deletion must be postponed due to legal preservation obligations, including but not limited the obligation to preserve evidence related to actual or anticipated litigation.

Biometric data will not be retained for more than 90days after an employee's last interaction with Northern Glass, Inc., unless otherwise required by law.

#### **Distribution and Updates**

Northern Glass, Inc. will update this policy if it begins collecting biometric data for any other purposes. Northern Glass, Inc. reserves the right to amend this policy at any time.