



Biometric Information and Security Policy

October 18, 2022

1. PURPOSE

1.1. This Biometric Information and Security Policy (“Policy”) provides you with an explanation as to ERA Industries, Inc.’s policy and procedures for collection, use, safeguarding, storage, retention and destruction of biometric data collected by the Schlage timeclocks utilizing software developed by AMGtime (together the “HandPunch”) This Policy specifically explains the company’s legal responsibilities and procedure as to information or data.

1.2 ERA Industries, Inc. (“ERA Industries”) purchased the HandPunch for timekeeping purposes with regard to payroll. The timekeeping system is an automated time and attendance software that can reduce inefficiencies for data entry and improve payroll accuracy. This system collects, stores and uses only an algorithm or mathematical representation of your hand for purposes of this timekeeping.

2. BIOMETRIC DATA

2.1. Biometric data is information related to a person’s human characteristics, which can be used to identify that person. Common forms of biometric data include fingerprints, DNA, voiceprint, veins in your palm, face recognition and iris or retina recognition.

3. POLICY

3.1. This Policy replaces and supersedes all previous policies related to biometric data.

3.2. ERA Industries’ policy is to protect the data in our possession and control it in accordance with applicable standards and laws including, but not limited to, the Illinois Biometric Information Privacy Act, 740 ILCS 14/1, *et seq.* (“BIPA”).

3.3. When you are enrolled in the system, the HandPunch takes several different measurements, including the length of the person’s fingers and the width of their hand. It then uses the measurements in a proprietary algorithm and stores the result in the timeclock and on the ERA network. Each time an employee places their hand on the platen of the HandPunch, it captures a three-dimensional image of the hand which is used to verify their identity. If the person’s hand measurement matches the stored value, a punch is created. If the person’s hand does not match a stored value, it is rejected.



3.4 No fingerprints, palm prints, photographs or any other images are collected or stored and there is no sensitive or personally identifiable information collected by ERA that is linked to this biometric information. As stated in 3.3, the HandPunch measures the hand and stores a value derived from the dimensions. The value that is stored cannot be reverse-engineered to discover a person's identity or any other information about the person.

3.5. ERA Industries, including its affiliated companies, does not convert, share, sell, lease or trade any of your biometric information to or with any other company nor does ERA Industries otherwise profit from any biometric data. ERA Industries will not otherwise disclose or disseminate biometric data without your written consent, unless the disclosure is required by state or federal law or municipal ordinance, or pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

3.6. ERA Industries has developed this Policy to provide you notice about its practices and to obtain your written consent about this collection and use of data or information. The Company also seeks your written consent in compliance with state and federal regulations, statutes or other laws, including BIPA, to demonstrate that you agree that an algorithm or mathematical representation of your hand can and may be utilized in conjunction with ERA Industries' employment purposes as stated herein.

3.7. In the event ERA Industries begins collecting biometric data for any other or additional purpose, ERA Industries will update this Policy.

3.8. ERA Industries exercises a reasonable standard of care in our industry for the data it collects. The company stores and protects the data of its employees using a reasonable standard of care and in a manner that is the same as or exceeds the standards followed in maintaining other confidential and sensitive information held by ERA Industries.

4. PROCEDURE

4.1. ERA Industries destroys any data it collects and has within its control, regarding its employees and their use of the timekeeping system, within a reasonable period of time after the purpose for obtaining or collecting such data has been fulfilled. Generally, this means upon termination of your employment or as required by applicable state and federal regulations and statutes, whichever is sooner.

4.2. A copy of this document has been made available to the public at www.eraind.com, in our breakrooms and will be made available to you upon request.