

Biometric Data Information Retention and Destruction Policy for Applicable Illinois Customers

Introduction

Amano Cincinnati, Inc. (the “Company”) provides time management solutions and services to customers through the TimeGuardian platform and related time clock products and services. In providing these particular products and services, the Company may receive fingerprint and facial recognition template data (“Biometric Data”) of the customers’ employees for purposes of system maintenance, data storage and terminal repair. The Company’s customers may transmit Biometric Data of an individual to the Company only after receiving proper written consent.

Scope

This policy applies to the Biometric Data of the employees of the Company’ customers that utilize the products and services in Illinois.

Purpose

In accordance with the Illinois Biometric Information Privacy Act (740 Ill. Comp. Stat. Ann. 14/1 et seq.) (the “Illinois BIPA”), the Company maintains policies and procedures to ensure the proper collection, use, safeguarding, storage, retention, and destruction of Biometric Data by the Company. As required by the Illinois BIPA, the Company further makes available to the public this Biometric Data Information Retention and Destruction Policy.

Retention Schedule and Destruction Guidelines

The Company shall retain Biometric Data for up to sixty (60) days following receipt of a customer’s or employee’s notice that the employee’s employment with the customer has ended. Once this time period has elapsed, the Company shall permanently destroy all copies of the employee’s Biometric Data in its possession and shall demand that its vendors do the same. Absent a valid warrant or subpoena issued by a court of competent jurisdiction or other legal requirement, the Company and its vendors shall comply with the aforementioned retention schedule and destruction guidelines.