



## **Time Clock Policy**

Each Salaried Nonexempt and Hourly associate is responsible for clocking in and out at the timeclock each day. Should you forget to clock in or out, please notify your direct supervisor right away. This will help ensure accurate tracking of hours worked and appropriate pay. Misuse of the timeclock may result in a code of conduct violation.

### **Collection and Use of Time Clock Information**

To facilitate accurate recordkeeping of time worked, creative werks uses a fingertip scanner equipped clock along with identification numbers or badges. This process also is used for security purposes to allow us to know who is in our facility at any given time.

We recognize the potentially sensitive nature of using this type of information and are committed to protecting this information with the same care and diligence we use to protect other confidential and sensitive information maintained by the Company. In an effort to further this commitment, this policy: (i) provides information on the information we gather through the use of the fingertip scanner device; (ii) establishes guidance for the collection, retention, and treatment of this information; and (iii) establishes procedures and guidelines for destroying this information.

This policy will be provided to employees, temporary workers assigned to work at our facilities, and made generally available through the Company' employee handbook. This policy will also be made publicly available on the Company's website at [www.creative-werks.com](http://www.creative-werks.com).

### **The Type of Information Collected and Utilized by the Company**

As part of the swiping in and out process, employees and temporary workers assigned to work at a creative werks facility enter their badge number by using a numeric keypad. The individual then places a finger on the scanner window. The scanner calls up a stored template of that individual's fingertip geometry, which is compared to the scanned fingertip attempting to clock in or out. The scanner uses reflections of your fingertip, but to protect your privacy, the measurements of your finger are not saved in the scanner's memory as an image. Instead, the geometric data is encoded by a mathematical formula and stored as a numerical template. This encoding technique is unique to and can only be encoded by the scanner time clock. This numerical template cannot be converted back into a usable fingerprint image.

The Company recognizes that under the Illinois Biometric Information Privacy Act, an employer has certain obligations when collecting and maintaining biometric identifiers and biometric information covered by the Act. Under the Act, this information can include retina or iris scans, fingerprints, voiceprints, scans of hand or face geometry and related information. We do not consider the mathematical representations stored in our system to be biometric identifiers or information under the Act. Nevertheless, we recognize the potentially sensitive nature of the information we collect and therefore protect it accordingly as described in this policy.

## Individual's Consent

This policy will be provided to employees upon hire, and to temporary workers assigned to work at a creative werks facility upon their assignment. This policy is meant to provide information on why the Company collects this information, a description of the information collected and stored, how the information will be stored and secured, and how long the information will be stored. Upon receipt of this policy, the individual will be required to sign, as a condition of employment or assignment to a creative werks facility, a written release consenting to Company' collection of the employee's information.

## Retention, Storage and Protection of the Information

The information collected under this policy will be retained until such time as the employee's employment with creative werks is terminated, and will be destroyed no later than 30 days after the date of separation from employment. For temporary workers assigned to work at creative werks, the information collected under this policy will be retained for up to 1 year. The company will conduct an annual purge of this information once a year on any temporary associate who has been inactive with the company. Any individual rehired by creative werks or reassigned to work here whose information has been destroyed will be provided with this policy again and required to provide a new written release consenting to the Company's collection of the employee's information. These retention guidelines are subject to modification as required by law.

The numerical template of your fingertip scan shall be maintained by creative werks in its secured electronic files to which only the Director of IT, System Analyst, and VP, HR and Senior HR Manager shall have full access. The individuals who have access to this data cannot see any fingerprint images nor the encrypted mathematical representations of those images. These individuals can only see verification that a scan was registered and has no ability to obtain an actual fingerprint. As necessary, timeclock information is shared with third party resources such as ProConsult and Commeg Systems. The Company instructs these third parties that they must maintain this information using security measures that are at least as rigorous as those measures used to protect their other confidential and sensitive information, and that they must not redisclose this information to anyone without your written permission.

Nothing in this policy shall be construed to prohibit the Company from maintaining certain records derived from the use of the numerical fingertip template (for instance, the employee's time records) for a longer period of time in the Company' discretion and/or as required by law.

The Company will not sell, lease, trade, or otherwise disseminate or disclose any individual's numerical fingertip template unless and until (1) the individual provides written consent to the disclosure; (2) the Company is compelled to disclose the biometric information pursuant to a valid warrant, subpoena or court order; or (3) Company is required to disclose the information under a federal or state law or municipal ordinance.