

UNITED STATES CYLINDER GAS CORPORATION'S BIOMETRIC DATA PRIVACY POLICY

In order to efficiently, accurately and securely record hours worked by employees, United States Cylinder Gas Corporation (“the Company”) utilizes a biometric timekeeping system (Workwell Technologies, Inc.’s Workwell-uAttend). The purpose of this Biometric Data Privacy Policy (“policy”) is to define the Company’s procedures for the collection, use, safeguarding, storage, retention, and destruction of biometric data. It is the policy of the Company to protect, use and store biometric data in accordance with applicable laws including, but not limited to, the Illinois Biometric Information Privacy Act. A copy of this policy is available to the public through the Company’s website.

1. Biometric Data Defined. As used in this policy, biometric data includes “biometric identifiers” and “biometric information” as defined in the Illinois Biometric Information Privacy Act, 740 ILCS § 14/1, *et seq.* “Biometric identifier” means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. 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 identifiers additionally do not include information captured from a patient in a health care setting or information collected, used, or stored for health care treatment, payment, or operations under the federal Health Insurance Portability and Accountability Act of 1996.

“Biometric information” means any information, regardless of how it is captured, converted, stored, or shared, based on an individual's biometric identifier used to identify an individual. Biometric information does not include information derived from items or procedures excluded under the definition of biometric identifiers.

2. Purpose. The Company, its vendors, and/or the licensor of the Company’s time and attendance software collect, store, and use biometric data for the purpose of efficiently, securely, and accurately recording employees’ hours worked using the Workwell-uAttend system. The Company, its vendors, and the Licensor will not sell, lease, trade, or otherwise profit from any employee’s biometric data; provided, however, that the Company’s vendors and Licensor may be paid for products or services used by the Company that utilize such biometric data.

3. The Company's Collection of Biometric Data. The biometric timekeeping system utilized by the company is a computer-based system that scans an employee's finger or portion of their hand. The timekeeping system extracts unique data points and creates a unique mathematical representation used to verify the employee's identity; for example, when the employee arrives at or departs from the workplace.

4. Biometric Data Capture & Storage Policy. The Company will use a reasonable standard of care to store, transmit, and protect from disclosure all biometric data collected by the Company. The storage, transmission, and protection from disclosure will be performed in a manner that is the same as, or more protective than the manner in which the Company stores, transmits, and protects other confidential and sensitive information, including pass codes.

5. Disclosure. The Company will not disclose, redisclose, or otherwise disseminate any employee's biometric data to anyone other than its vendors and the Licensor providing products or services using the biometric data unless:

- a. The Company obtains the employee's prior consent to disclose or disseminate the employee's biometric data;
- b. The disclosed biometric data completes a financial transaction that is requested or authorized by the employee whose biometric data is disclosed;
- c. Disclosure is required by state or federal law or municipal ordinance; or
- d. Disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

6. Retention Schedule. Except as required by an order from a court with competent jurisdiction, the Company will retain employee biometric data only until the first of the following occurs:

- a. The initial purpose for collecting or obtaining such biometric data has been satisfied, such as when the employee's employment with the Company has been terminated, or when the employee moves to a role within the Company for which the biometric data is not used; or
- b. Within 3 years of the employee's last interaction with the Company.

The Company will permanently destroy an employee's biometric data upon expiration of the aforesaid time periods.

BIOMETRIC DATA PRIVACY RELEASE FORM

The employee named below (“Employee”) has been advised and understands that United States Cylinder Gas Corporation (“the Company), its vendors, and/or the licensor of the Company’s biometric timekeeping system (Workwell-uAttend) collect, retain, and use biometric data for the purpose of efficiently, securely, and accurately recording employees’ hours worked.

The biometric timekeeping system utilized by the Company is a computer-based system that scans an employee’s finger or portion of their hand. The timekeeping system extracts unique data points and creates a unique mathematical representation used to verify the Employee’s identity; for example, when the Employee arrives at or departs from the workplace.

The Illinois Biometric Information Privacy Act, 740 ILCS 14/1, *et seq.* (“BIPA”), regulates the collection, storage, use, and retention of “biometric identifiers” and “biometric information.” “Biometric identifier” means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. “Biometric information” means any information, regardless of how it is captured, converted, stored, or shared, based on an individual’s biometric identifier used to identify an individual.

The Employee understands that he or she is free to decline to provide biometric identifiers and biometric information to the Company, its vendors, and/or the licensor of the Company’s biometric timekeeping system, but that agreeing to provide such biometric identifiers and information is a condition of employment. The Employee may revoke this consent at any time by notifying the Company in writing. However, the undersigned Employee further acknowledges that consent to the Company’s collection, storage, use, and retention of biometric data is a condition of employment, as authorized by BIPA, 740 ILCS 14/10. Individuals are free to decline or revoke this consent, but doing so will preclude employment by the Company.