**Biometric Information Policy**

Belmont Plating Works, Inc. and its affiliates (collectively, “Belmont” or the “Company”), its vendors, and/or the licensor of the Company’s time and attendance software, collect, retain, and use biometric information and/or biometric identifiers of its Personnel, a term which includes Belmont’s employees and workers placed with the Company by a staffing vendor. This Biometric Information Policy (the “BIPA Policy”), which is publicly available at www.belmontplatingworks.com, notifies Personnel in writing of the purpose and duration for which the biometric information is being collected.

A separate Biometric Information Security Disclosure, Consent, and Release Form (the “BIPA Release”) is provided to Personnel, further notifying them in writing of the purpose and duration for which their biometric information is being collected, and obtaining a written consent and release authorizing the collection and retention of biometric information.

***Definitions***

As used in this BIPA Policy, and in accord with the Illinois Biometric Information Privacy Act (“BIPA”), 740 ILCS 14/1, *et seq*., the following terms have the indicated meaning:

* “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 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.

***Purpose for Collecting Biometric Information***

The Company, its vendors, and/or the licensor of the Company’s time and attendance software collects, captures, stores, and uses Biometric information, including information based on an individual’s iris, retina, and facial geometry, for the purpose of recording time entries when using the Company’s timeclocks. Biometric information is thus used for the purpose of Personnel identification, fraud prevention, the recording and tracking of an individual’s time and attendance, wage and salary administration, and protecting the safety of all Personnel.

***How Biometric Information May Be Obtained***

The Company, its vendors, and/or the licensor of the Company’s time and attendance software, collects, captures, stores, and uses Biometric information, including information based on an individual’s iris, retina, and facial geometry, when an individual uses the Company’s timeclocks. The Company’s timeclock system is a computerized system or device that uses non-contact iris and facial recognition technology to verify an individual’s identity for time keeping purposes, as described above.

***Retention of Biometric Information***

The Company will retain an individual’s Biometric information during the period of their employment or placement with the Company and for three (3) years after the individual last provides labor to the Company, at which point the initial purpose for collecting or obtaining such Biometric identifiers and/or Biometric information will be deemed to have been satisfied, and the Biometric identifiers and Biometric information will be permanently destroyed.

The Company will direct any vendor and/or licensor of the Company’s time and attendance software with access to individuals’ Biometric identifiers or information to follow the above destruction schedule.

***Use and Disclosure of Biometric Information***

Belmont will use individuals’ Biometric identifier and Biometric information only for internal business purposes related to the individual’s employment or placement with the Company.

Belmont will not sell, lease, trade, or otherwise profit from individuals’ Biometric identifier or Biometric information.

Other than Belmont’s limited use of an individual’s Biometric identifiers and Biometric identifiers described in the BIPA Policy and in this BIPA Release, Belmont will not disclose, redisclose, or otherwise disseminate an individual’s Biometric identifier or Biometric information, unless:

1. The individual consents to the disclosure or redisclosure;
2. The disclosure or redisclosure serves to complete a financial transaction requested or authorized by the individual;
3. The disclosure or redisclosure is required by State or federal law or municipal ordinance; or
4. The disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

Belmont will store, transmit and protect from disclosure of individuals’ Biometric information using a reasonable standard of care and in a manner that is the same as or more protective than the manner in which Company stores, transmits, and protects other confidential and sensitive information.