



## BIOMETRIC INFORMATION SECURITY POLICY

### PURPOSE

To define the policy and procedures for collection, use, safeguarding, storage, retention, and destruction of biometric data collected by ARYZTA LLC (“ARYZTA”).

### DEFINITIONS

“Biometric data” means any personal information stored by ARYZTA about an individual’s physical characteristics that can be used to identify that person, regardless of how it is captured, converted, stored or shared. Biometric data can include fingerprints, voiceprints, scans of hand or face geometry or retina or iris scans.

### POLICY

- ARYZTA’s policy is to protect and store biometric data in accordance with applicable standards and laws including, but not limited to, the Illinois Biometric Information Privacy Act, 740 ILCS 14/1, et seq. (eff. 10/3/2008).
- An individual’s biometric data will not be collected or otherwise obtained by ARYZTA without prior written consent of the individual. ARYZTA will inform the individual of the reason his or her biometric information is being collected and the length of time the data will be stored. A sample consent statement is included as Appendix A to this policy and will be tailored to fit the type of biometric data collected.
- ARYZTA will not sell, lease, trade, or otherwise profit from an individual’s biometric data.
- Biometric data will not be disclosed by ARYZTA unless: (a) consent is obtained; (b) disclosure is necessary to complete a financial transaction requested or authorized by the subject; (c) disclosure is required by law; or, (d) disclosure is required by subpoena.
- Biometric data will be stored using a reasonable standard of care for ARYZTA’s industry and in a manner that is the same or exceeds the standards used to protect other confidential information held by ARYZTA.
- ARYZTA will destroy biometric data when the initial purpose for obtaining or collecting such data has been fulfilled.
- ARYZTA reserves the right to amend this Biometric Information Security Policy at any time.
- A copy of this policy will be made available to the public at <http://www.aryztaamericas.com/>.





## PROCEDURE

1. ARYZTA collects, stores, and uses employee fingerprint data for the purpose of authenticating and tracking the time worked by employees at ARYZTA's business and bakery locations. Fingerprint data may also be collected and used to provide access to these business and bakery locations.
2. Prior to collecting an employee's fingerprint data, ARYZTA will obtain the consent of the employee.
3. ARYZTA will store, transmit, and protect biometric data using the same standard of care and security controls it provides protected health information in its possession.
4. ARYZTA's information technology department will permanently destroy an employee's biometric information from ARYZTA's systems and request that any third-party administrator of ARYZTA's time tracking system also permanently destroy an employee's biometric information from such third-party administrator's system upon the employee's separation of employment from ARYZTA.
5. In the event ARYZTA begins collecting biometric data for any additional purpose, ARYZTA will update this procedure.

