## **BIOMETRIC INFORMATION PRIVACY POLICY**

## **Policy Statement**

Computer Services, Inc. ("CSI"), including its subsidiaries and related entities, (collectively, the "Company") collects certain biometric data from individuals. This policy explains what information the Company collects, how this information is used, how it is stored, safeguarded, retained, and disposed of.

The Company utilizes security equipment and software with biometric technology to identify individuals when utilizing the Company's security equipment and software. Pursuant to the use of the biometric technology, the Company has instituted the following biometric information privacy policy:

## **Biometric Data Defined**

"Biometric data" means personal information stored by the Company regarding an individual's physical characteristics that can be used to identify a person, such as fingerprints, voiceprints, facial shape, or scan of hand or face geometry. Biometric data includes "biometric identifiers" and "biometric information."

"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 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.

## **Purpose for Collection of Biometric Data**

The Company, its vendors, and/or the licensor of the Company's security equipment and software collect, store, and uses biometric data to give individuals access to Company facilities, for individual identification, and fraud prevention. An individual's biometric data is collected, stored, and used while the individual is a potential guest of the Company, pursuant to the retention schedule provided below.

The Company, its vendors, and/or the licensor of the Company's security equipment and software will not sell, lease, trade, or otherwise profit from an individuals' biometric data; provided, however, the Company's vendors and the licensor of the Company's security

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equipment and software may be paid for products or services used by the Company that utilize such biometric data.

## **Authorization**

To the extent that the Company, its vendors, and/or the licensor of the Company's security equipment and software collect, capture, or otherwise obtain biometric data relating to an individual, the Company must first:

- 1. Inform the individual in writing that the Company, its vendors, and/or the licensor of the Company's security equipment and software are collecting, capturing, or otherwise obtaining the individual's biometric data, and that the Company is providing such biometric data to its vendors and the licensor of the Company's security equipment and software;
- 2. Inform the individual in writing of the specific purpose and length of time for which the individual's biometric data is being collected, stored, and used; and
- 3. Receive a written release signed by the individual (or their legally authorized representative) authorizing the Company, its vendors, and/or the licensor of the Company's security equipment and software to collect, store, and use the individual's biometric data for the specific purposes disclosed by the Company, and for the Company to provide such biometric data to its vendors and the licensor of the Company's security equipment and software.

## **Disclosure**

The Company stores all biometric data in accordance with applicable standards and laws. The Company will not sell, lease, trade, or otherwise profit from an individual's biometric data.

The Company will not disclose or disseminate any biometric data to anyone other than its vendors and the licensor of the Company's security equipment and software providing products and services using biometric data without/unless:

- 1. First obtaining written individual consent to such disclosure or dissemination (*see* Attached Acknowledgment Form);
- 2. The disclosed data completes a financial transaction requested or authorized by the individual;
- 3. Disclosure is required by state or federal law or municipal ordinance; or
- 4. Disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

## **Retention Schedule**

The Company shall retain individual biometric data only until, and shall request that its vendors and the licensor of the Company's security equipment and software permanently destroy such data when, the first of the following occurs:

- 1. The initial purpose for collecting or obtaining such biometric data has been satisfied; or
- 2. Within 3 years of the individual's last interaction with the Company.

In no situation will biometric data be retained for more than three years after an individual's last interaction with the Company, unless otherwise required by law.

## **Data Storage**

Biometric data will be stored, transmitted, and protected using a reasonable standard of care for the Company's industry, in a manner that is the same as or that exceeds the standards of care used to protect other confidential information held by the Company. This includes, among other things, restricting access to biometric data to authorized Company individuals or vendors who have a business need to access the information, and using reasonable technological means to prevent unauthorized access to the information. Such storage, transmission, and protection from disclosure shall be performed in a manner that is the same as or more protective than the manner in which the Company stores, transmits and protects from disclosure other confidential and sensitive information, including personal information that can be used to uniquely identify an individual or an individual's account or property, such as genetic markers, genetic testing information, account numbers, PINs, driver's license numbers, and social security numbers.

## **Policy Distribution and Updates**

A copy of this policy will be made publicly available at https://www.csiweb.com/privacy-policy/.

CSI will update this policy if it begins collecting biometric data for any other purposes. CSI reserves the right to amend this policy at any time.

# CSI BIOMETRIC INFORMATION PRIVACY POLICY ACKNOWLEDGEMENT AND CONSENT

The individual named below has been advised and understands that the Company, its vendors, and/or the licensor of the Company's security equipment and software collect, retain, and use biometric data for the purpose of identifying individuals when utilizing the Company's security equipment and software. Biometric equipment is computer-based systems that scan an individual's biometrics for purposes of identification.

The individual understands that they are free to decline to provide biometric identifiers and biometric information to the Company, its vendors, and/or the licensor of the Company's security equipment and software without any adverse action. The individual may revoke this consent at any time by notifying the Company in writing.

The undersigned individual acknowledges that they have received the attached *Biometric Information Privacy Policy*, and that they voluntarily consent to the Company's, its vendors', and/or the licensor of the Company's security equipment and software 's collection, storage, and use of biometric data through a biometric security equipment, including to the extent that it utilizes the individual's biometric identifiers or biometric information as defined by applicable law, and voluntarily consents to the Company providing such biometric data to its vendors, and/or the licensor of the Company's security equipment and software .

| Individual Signature    | Date |
|-------------------------|------|
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|                         |      |
|                         |      |
| Individual Name (print) |      |