

PurposeBuilt Brands, Inc. and its subsidiaries (collectively, “Company”, “our”, “we” and “us”) have instituted the following policy related to any biometric identifiers or biometric information that we possess as a result of our operations.

Biometric Identifiers and Biometric Information Defined

As used in this policy, “biometric identifiers” and “biometric information” are defined in accordance with the definitions set forth 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 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 and/or its vendors may collect, store, use and/or transmit biometric identifiers or biometric information during the course of conducting the Company’s operations. With respect to biometric identifiers or biometric information collected, stored, used and/or transmitted by the Company and/or its vendors, to the extent required by law, we will obtain written authorization from each employee for the benefit of the Company and/or the Company’s authorized licensors or vendors to collect, store, use, and/or transmit biometric identifiers or biometric information prior to the collection of same.

The Company and/or its vendors will collect, store, use and/or transmit any biometric identifiers or biometric information solely for identifying employees, recording time entries and identity verification. Neither the Company nor its vendors will sell, lease or trade any biometric identifiers or biometric information that it receives from employees.

Authorization

To the extent that the Company and/or its vendors collect, capture, or otherwise obtain biometric identifiers or biometric information relating to an employee, the Company will first:

- inform the employee or the employee’s legally authorized representative in writing that the Company and/or its vendors are collecting or storing the employee’s biometric identifiers or biometric information, and that the Company may provide such biometric identifiers or biometric information to its vendors;
- inform the employee or the employee’s legally authorized representative in writing of the specific purpose and length of time for which the employee’s biometric identifiers or biometric information is being collected, stored, and used; and

- receive a written release signed by the employee or the employee's legally authorized representative authorizing the Company and/or its vendors to collect, store, and use the employee's biometric identifier or biometric information for the specific purposes disclosed by the Company, and for the Company to provide such biometric identifiers or biometric information to its vendors.

The Company, and/or its vendors will not sell, lease, trade, or otherwise profit from an employee's biometric identifier or biometric information.

Disclosure

The Company will not disclose, redisclose or otherwise disseminate an employee's biometric identifier or biometric information to anyone other than its authorized vendors unless:

- the subject of the biometric identifiers or biometric information or the subject's legally authorized representative consents to the disclosure or redisclosure;
- the disclosure or redisclosure completes a financial transaction requested or authorized by the subject of the biometric identifiers or biometric information or the subject's legally authorized representative;
- the disclosure or redisclosure is required by State or federal law or municipal ordinance; or
- the disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

Retention Schedule

The Company will retain any employee's biometric identifiers or biometric information in the Company's possession only until the first of the following occurs:

- the initial purpose for collecting or obtaining such biometric identifiers or biometric information has been satisfied, such as the termination of employment or movement to a role for which the biometric identifiers or biometric information are/is not used; or
- within 3 years of the employee's last interaction with the client.

Data Storage

The Company and its vendors will:

- store, transmit, and protect from disclosure all biometric identifiers and biometric information using the reasonable standard of care within the private entity's industry; and
- store, transmit, and protect from disclosure all biometric identifiers and biometric information in a manner that is the same as or more protective than the manner in which the private entity stores, transmits, and protects other confidential and sensitive information.

Effective Date: August 1st, 2023