

Belmont Village Biometric Data Policy for Employees – Effective September 1, 2026

Belmont Village (the “Company”) utilizes biometric time clocks in some of its offices. Biometric time clocks provide an efficient manner in which to track hours worked and attendance. Biometric time clocks that require the use of finger or hand scans provide a secure and accurate way to measure your time worked at the Company. Your time clock entries, once approved by your supervisor or manager, are used to calculate payroll efficiently and accurately.

To facilitate accurate and efficient payroll processing and to help maintain safe and secure working environment, the Company collects and stores biometric data, including fingerprint and/or hand geometry data, as applicable. The Company may disclose biometric data to its contracted payroll and timekeeping service provider, ADP, Inc., solely as necessary to determine hours worked and process payroll, subject to applicable law and employee’s consent where required. The Company and its third-party vendors will not sell, lease, trade, or otherwise profit from your biometric data. And, the Company and its third-party vendors will not disclose, redisclose, or otherwise disseminate your biometric data, unless otherwise permitted by law.

The Company will store and maintain finger scans and hand scans for the duration of your employment, or until the Company ceases to use biometric time clocks for payroll processing, whichever occurs first.

In the event the Company ceases to use applicable biometric data, the Company will destroy the relevant biometric data in its possession no later than one business day after the separation of your employment with the Company or the Company’s cessation of use of biometric time clocks, as applicable. The Company will employ at least a reasonable standard of care with respect to the security and confidentiality of your biometric data, and in no event will the Company utilize a standard of care that is less than the standard of care that the Company applies to other confidential and sensitive information.

In accordance with applicable state and federal law, the Company does not sell, lease, trade, or otherwise profit from an employee’s biometric data. In addition, the Company and the Company’s authorized service providers do not disclose any employee’s biometric data to a third party unless:

1. The employee consents to such a disclosure;
2. The disclosure completes a financial transaction requested or authorized by the employee;
3. The disclosure is required by state or federal law, or municipal ordinance; or
4. The disclosure is required pursuant to a valid warrant or subpoena.

A copy of this Policy is posted in the Employee Break Room, available on the Company's website, and is available upon request.

THIS POLICY IS NOT A CONTRACT OF EMPLOYMENT, AND IT MAY BE MODIFIED AT THE DISCRETION OF THE COMPANY AT ANY TIME, WITH OR WITHOUT NOTICE TO YOU IN ACCORDANCE WITH ITS TERMS. NOTHING CONTAINED IN THIS POLICY ALTERS YOUR “AT-WILL” EMPLOYMENT RELATIONSHIP WITH THE COMPANY.