

**Policy C-22**  
**Biometric Information Privacy Policy**

Catholic Charities of the Archdiocese of Chicago ("Catholic Charities") uses biometric time clocks at certain sites through which an employee's fingerprint is scanned for time and attendance purposes. Catholic Charities currently uses ADP and its licensors as its time and attendance tracking system vendor ("Vendor"). In accordance with Illinois law, Catholic Charities has implemented this policy relating to the retention, collection, disclosure and destruction of biometric information. All employees whose biometric information is collected will be required to sign an Employee Consent Form (attached as Exhibit A) upon hire and as requested thereafter by Catholic Charities.

The terms "biometric data" and "biometric information" as used in this Policy and Exhibit A are intended to have the same definition provided in the Illinois Biometric Information Privacy Act, 740 ILCS §14/1, *et seq.*

**Purpose for Collection of Biometric Data**

Catholic Charities, through its Vendor, collects, stores, and uses biometric data only for employee identification, fraud prevention, and the recording and tracking of an employee's time and attendance. For more information about the Vendor's Biometric Information Privacy Policy, please visit <https://www.adp.com/privacy/>.

**Disclosure**

Catholic Charities will not disclose or disseminate any biometric data to any third party, including its Vendor unless it obtains the employee's written consent to such disclosure or dissemination or as required or authorized by law.

**Retention Schedule and Destruction of Biometric Information**

Catholic Charities, through its Vendor, will retain employee biometric information collected pursuant to this Policy until such time as employment is terminated or Catholic Charities discontinues its use of biometric information pursuant to this Policy. Upon termination of employment or discontinued use of biometric time clocks, Catholic Charities will notify its Vendor. Once Catholic Charities provides such notice, Vendor will automatically destroy biometric information in Vendor's possession. As such, an employee's biometric data will be permanently destroyed within thirty (30) days of an employee's separation from employment.

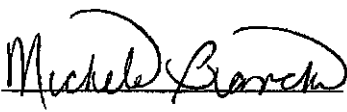
Exhibit A: Biometric Information Privacy Employee Acknowledgement and Consent Form

Policy Number: C-22

Area: Human Resources

Policy Title: Biometric Information Privacy Policy

Effective Date: 3/4/2019

Approved:   
Senior VP Human Resources/General Counsel

  
Administrator, President & CEO

**Exhibit A**

**Biometric Information Privacy Employee Acknowledgement and Consent Form**

The employee named below acknowledges that they have been advised and understands that Catholic Charities currently uses ADP and its licensors as its time and attendance tracking system vendor ("Vendor"). The employee named below has been notified that Catholic Charities, through its Vendor, collects, stores, and uses biometric data only for employee identification, fraud prevention, and the recording and tracking of an employee's time and attendance.

By signing this form, the employee acknowledges that they have received the Biometric Information Privacy Policy and that they voluntarily consent to the collection, retention, disclosure and destruction of their biometric data and biometric information by Catholic Charities through its Vendor. The employee may revoke this consent by notifying Human Resources in writing.

Employee Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Employee Name (Print): \_\_\_\_\_