



BIOMETRIC INFORMATION RETENTION POLICY

1. Purpose.

Forman Mills, Inc. (the “**Company**”) uses timeclocks and software supplied by its third-party vendor, Kronos Incorporated (“**Kronos**”). The timeclocks and software use biometric identifiers and biometric information, such as fingerprints, to enable the Company’s employees to quickly and accurately clock-in and clock-out for work for payroll purposes.

The Company has instituted this Biometric Information Retention Policy to establish the guidelines and procedures for its collection, storage, disclosure, use, protection, and destruction of the biometric identifiers and biometric information provided by employees using the Company’s timeclocks and software.

It is the Company’s policy to ensure that biometric identifiers and biometric information are used and handled in accordance with all applicable laws.

2. Scope.

This Policy applies to all of the Company’s facilities and all of the Company’s employees using fingerprint-scanning timeclocks.

3. Employee Finger Scan Data.

As part of its timekeeping process, the Company uses timeclocks and software supplied by its third-party vendor, Kronos. The timeclocks scan an employee’s fingerprint for purposes of verification, in connection with the Company’s timekeeping functions, to ensure that employees are recognized and paid for their time worked. The devices use a secure technology that generates an encoded mathematical representation of the employees fingerprint. The Company securely stores these representations at a Company-controlled site or on secure space made available by Kronos in a cloud environment for that purpose. If an employee’s employment at Company ends, the fingerprint data will be permanently destroyed by the Company within 90 days. This Biometric Information Retention Policy is available on the Company’s website at <https://formanmills.com/legal-information/>.

4. Written Release.

The Company requires its employees, as a condition of their initial or continued employment with Company, to sign a written release authorizing the Company, Kronos and any third-party subcontractors retained by Kronos to collect, capture, use, store, obtain, possess, disclose or re-disclose an employee’s biometric identifiers and biometric information for activities such as timekeeping purposes, equipment servicing, database maintenance, software repair, data restoration or to maintain backup copies

necessary for related activities. The form of the release is attached hereto as Exhibit A.

5. Use, Disclosure, Protection, Storage and Destruction of Finger Scan Data.

An Employee's biometric identifiers and biometric information will only be used for the purposes and related activities set forth in this Policy. The Company will not sell, lease, trade, or otherwise profit from an employee's biometric identifiers or biometric information. The Company will not disclose, re-disclose, provide access to or otherwise disseminate any biometric identifiers or biometric information outside of the terms of this Policy, unless:

- The employee or the employee's legally authorized representative provides consent to such disclosure;
- The disclosed data completes a financial transaction requested or authorized by the employee or the employee's legally authorized representative;
- The disclosure 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.

The Company will use the reasonable standards of care within its industry for any storage, transmittal or protection from disclosure of any biometric identifiers and biometric information, and the Company will follow standards of care that are the same or greater than the standards of care that the Company uses to protect other employee data.

Kronos has publicly represented that they do not sell, lease, trade or profit from such data, and that they use reasonable standards of care within their industries for any storage, transmittal or protection from disclosure of any such data. Please see Kronos Privacy Policy at <https://www.kronos.com/privacy-policy>.

EXHIBIT A - WRITTEN RELEASE

As a condition of my employment with Forman Mills, Inc. (the "Company"), I acknowledge that I have read and understood the Company's Biometric Information Retention Policy, and that I authorize the Company to collect, store, and use my biometric identifiers and biometric information for the duration of my employment for the purposes described in the Company's Biometric Information Retention Policy. I further authorize the Company to disclose my biometric identifiers and biometric information to its timeclock supplier, Kronos Incorporated ("Kronos") and Kronos' subcontractors for the purposes described in the Company's Biometric Information Retention Policy.

Employee Signature

Date

Employee Printed Name