



<b>TITLE:</b> REYES HOLDINGS BIOMETRIC INFORMATION POLICY	
<b>APPROVED BY:</b> REYES HOLDINGS CHIEF LEGAL OFFICER	<b>EFFECTIVE DATE:</b> UPDATED: FEBRUARY 01, 2023

1.1 **Policy Statement.** Reyes Holdings, L.L.C. and its U.S. operating companies (collectively, “Reyes”, “Company”, “our”, or “we”) have adopted this *Reyes Holdings Internal Biometric Information Policy* (the “Policy”) to govern the collection, use, storage, disclosure, transmission, retention, and disposal of Biometric Information (as defined herein). Reyes recognizes the importance of protecting Biometric Information. Compliance with this Policy is mandatory and must be taken seriously by employees, contractors, and any other individuals who have access to Biometric Information.

1.2 **Purpose.** The purpose of the Policy is to:

- Define Biometric Information;
- Explain the purpose for collecting, storing, disclosing, transmitting, retaining, and using Biometric Information;
- Describe any potential disclosure of Biometric Information;
- Identify other Reyes policies that apply to Biometric Information; and
- Obtain the informed consent of any Data Subjects to the collection, use, and disclosure of their Biometric Information.

1.3 **Scope.** This Policy applies to all Biometric Information collected, used, stored, disclosed, transmitted, retained, disposed of, or otherwise used by Reyes in the conduct of its U.S. operations. This Policy governs the conduct of all Reyes employees and contractors who provide or have access to Biometric Information.

1.4 **Related Policies.** Other Company policies also apply to the collection, use, storage, protection and handling of Biometric Information and may be relevant to implementing this Policy. You should familiarize yourself with these policies, including:

- Reyes Holdings Personal Information Protection Policy
- Reyes Holdings HIPAA Privacy Policy

February 1, 2023

- Reyes Holdings Records Retention Policy and Destruction Guidelines
- Reyes Employee Privacy Policy

1.5 **Authority and Precedence.** If there is any conflict between this Policy and any other Reyes policy, the terms of this Policy shall take precedence. Other policies may be applied in addition to this Policy, so long as the protections provided by the other policies are at least as, or more restrictive than the protections set forth in this Policy.

## 2. **Definitions**

2.1 **“Biometric Information”** is defined by law to mean any of the following pieces of information that Company has in its possession, regardless of how it is collected, captured, converted, stored, or shared: any biometric identifier, any information derived from or based on any biometric identifier, and any physical or electronic record of any biometric identifier; any identifier template (such as a faceprint, minutiae template, or voiceprint), as well as the imagery from which an identifier template is extracted, including: retina scans, iris scans, scans of hand or face geometry, and palm or vein patterns; any unique physiological, biological, or behavioral patterns or characteristics, including: DNA, keystroke patterns and rhythms, gait patterns or rhythms; and/or any sleep, health, or exercise data that contains identifying information. Company does not collect all these forms of Biometric Information.

2.2 **“Data Subject”** means the person about whom Biometric Information is collected.

## 3. **Collection, Use , Retention, and Disclosure of Biometric Information**

3.1 **Notice and Collection.** Biometric Information shall be collected in compliance with applicable Company policies, notices, and Data Subject consent.

3.2 **Sources.** We only collect your Biometric Information from you.

3.3 **Purpose for, and Use of, Biometric Information.** Biometric Information is only collected, used, and stored by Company for identity-verification purposes, and specifically to admit personnel to certain facilities, to control access to Company products, and/or to monitor personnel attendance and determine shift durations.

3.4 **Retention and Disposal of Biometric Information.** Biometric Information is retained only for so long as it is needed to satisfy the initial purpose for which it was collected, and no later than one year after termination of the Data Subject’s employment relationship with Company. Thereafter, the Biometric Information will be permanently destroyed in accordance with Company’s Records Retention Policy and Destruction Guidelines, unless the Biometric Information is subject to a valid litigation hold, or to a warrant or subpoena issued by a court of competent jurisdiction, in which case it will be destroyed no later than one year after it is no longer required to be maintained by law.

3.5 **Disclosure of Biometric Information.** Company will disclose Biometric Information to our service providers as reasonably necessary to achieve the purposes specified in this Policy and as allowed by applicable law, but will not otherwise disclose, redisclose, or disseminate Biometric

Information without the Data Subject's consent, unless such disclosure is required by state, federal, or municipal law, or by a valid warrant or subpoena issued by a court of competent jurisdiction.

3.6 **Sale and Sharing of Biometric Information.** The Company does not sell, lease, trade, or profit from Biometric Information, nor does it "share" Biometric Information for purposes of cross-context behavioral advertising or targeted advertising, as defined under applicable law.

#### 4. **Monitoring Compliance and Enforcement**

The Reyes Legal Department is responsible for administering and overseeing this Policy and, as applicable, developing related operating procedures, processes, policies, notices and guidelines. If you are concerned that any provision of this Policy, or any related policy, operating procedure, process, or guideline designed to protect Biometric Information has been or is being violated, please contact Reyes Legal Department. Employees or contractors who violate this Policy and any related guidelines, operating procedures, or processes designed to protect Biometric Information and implement this Policy may be subject to discipline.

#### 5. **Employees Covered under a Collective Bargaining Agreement**

The employment terms set out in this Policy work in conjunction with, and do not replace, amend, or supplement any terms or conditions of employment stated in any collective bargaining agreement. Wherever employment terms in this Policy differ from the terms expressed in the applicable collective bargaining agreement, employees should refer to the specific terms of the collective bargaining agreement, which will control.

#### 6. **Disclaimer of Restrictions on Employees' Rights under National Labor Relations Act**

This Policy is not intended to preclude or dissuade employees from engaging in legally protected activities/activities protected by state or federal law, including the National Labor Relations Act.

#### 7. **Rights and Requests**

If you are a resident of California you may make the following requests:

- (1) **"Request to Know"** - You may request that we disclose to you the following information covering the 12 months preceding your request:
  - The categories of Biometric Information we collected about you and the categories of sources from which we collected such Biometric Information;
  - The specific pieces of Biometric Information we collected about you in a transferable format;
  - The business or commercial purpose for collecting (if applicable) Biometric Information about you;
  - The categories of Biometric Information about you that we disclosed, and the categories of third parties to whom we disclosed such Biometric Information (if applicable).
- (2) **"Request to Correct or Delete"** - You may request that we correct or delete Biometric Information we collected from you.

Please refer to our Employee Privacy Policy for additional information on exercising these rights, or contact: [privacy@reyesholdings.com](mailto:privacy@reyesholdings.com) or (888)-295-6392.

8. **Amendment and Revision**

We may change or update this Biometric Privacy Policy from time to time, and will post updated versions on Reyes Connect. In the event a material change is made to this Policy, we will distribute the updated Policy to the affected Data Subjects and, depending on the nature of the change, we may provide the opportunity to revoke their consent prior to it taking effect.

9. **Questions**

For questions regarding this Policy or any related policy and/or practice, please contact Katie Byrne at [kbyrne@reyesholdings.com](mailto:kbyrne@reyesholdings.com).

**Consent to Collection, Use, and Disclosure of Biometric Information**

I have read, understand, and agree to the Reyes Holdings Biometric Information Policy (the “Policy”), and agree to adhere to the same.

I understand that the Policy may be amended from time to time in accordance with this Policy, **and that it is my sole responsibility to remain familiar with any changes as they are communicated to me.** I understand that I may review this Policy at any time by requesting a copy from the Company, or by viewing the Policy on Reyes Connect. **I also understand that in the event of an amendment this Consent to Collection, Use, and Disclosure of Biometric Information shall apply to the same, without necessity of my subsequent execution of an amendment to this document or a similar document, unless I communicate my revocation of consent in response to receiving an updated Policy.**

I agree that if any portion of this Policy is held invalid, the remainder of the Policy will continue in full legal force and effect. I have carefully read this Consent to Collection, Use, and Disclosure of Biometric Information and have had all of my questions fully answered to my satisfaction.

**I consent to the collection, use, and disclosure of my Biometric Information by Reyes Holdings, L.L.C. and its U.S. operating companies for the purpose and length of time stated in this Policy.**

I sign this Consent to Collection, Use, and Disclosure of Biometric Information freely and voluntarily, and with full knowledge of the meaning of its terms and its legal significance. I understand that I have the right to have my attorney review it.

**Signed** \_\_\_\_\_ **Date** \_\_\_\_\_

**Print Name** \_\_\_\_\_