RETENTION SCHEDULE AND GUIDELINES FOR BIOMETRIC DATA

Berner Food & Beverage Company, LLC (the "Company") requires its hourly employees to clock in and out for their shifts using biometric hand scanners. The biometric information obtained through the use of the Company's hand scanners is used to process payroll to the Company's payroll system and/or payroll providers. The Company's current payroll provider is Paylocity.

The Company's current payroll provider, Paylocity, uses Hand Punch Clocks. Hand Punch technology uses an employee's unique hand geometry to create a mathematical value, or "template" which is used to identify the employee when they clock in and out. The template is stored on the Company's time clock device and on the server on which the Company is running the hardware program. It is important to note that the Hand Punch Clocks do not store images of the hand itself, but rather store a 9-byte template, which is a mathematical representation of the hand image. Nevertheless, since this template is based on the employee's unique physical characteristics, it may be considered "biometric information" under Illinois law.

Paylocity retains the palm print in the system for a six-month period. The palm print is then placed into a backup server that Paylocity maintains for up to one year. The Company has requested that Paylocity delete each employee's biometric information upon separation of employment.

The Company only retains the biometric information from employee hand scans during the term of their employment. Once an employee separates employment from the Company, the employee's biometric information is removed from the Company's payroll system. Further, the Company sends direction to its payroll provider to delete the biometric information from the payroll provider's system.