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Effective: 03/2021
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Last Revised: 03/2021
Next Review: 03/2024
Owner: *Oanh Tran: HR Manager*
Area: *Human Resources*
References:

Employee Timekeeping Policy (PE-25)

Purpose:

This policy updates the prior notice regarding the established procedures for the use, protection, transmission, storage, disclosure, and destruction by Thorek Memorial Hospital (also referred to as the “Hospital”) of certain data generated when employees use the Hospital’s timeclocks that require scanning of employee fingertips. The Hospital uses this data for the purpose of ensuring that employees are accurately paid for all hours worked in connection with the Hospital’s payroll processes. The Hospital’s policy is to protect this data (which is described below) in accordance with the Illinois Biometric Information Privacy Act, even if that law does not cover this data.

A copy of this policy will be made available to all affected individuals, is distributed upon request, and is publicly posted on the employee intranet (<http://webserver/thintranet/>) and the Hospital’s webpage at thorek.org. If, in the future, data related to employees’ finger scans is obtained or used for any additional purposes than those stated in this policy, or if such information is retained longer than the time periods identified in this policy, the Hospital will revise this Policy and make it available to affected employees, in addition to updated any public posting.

Timeclocks / Information Derived From Employee Finger Scans:

The Hospital uses timeclocks provided by its third-party timekeeping vendor, ADP. As explained by the vendor, the timeclocks use multiple wavelengths of light to find points on the finger to create mathematical representations of certain features on each user’s finger. Using a proprietary algorithm, the data is converted into an alphanumeric template (“Template”). That Template is stored and then used for comparison each time a user clocks in or out using the timeclocks. No images of fingerprints or fingers are collected or stored in the timeclocks or timekeeping system, at initial enrollment or thereafter.

Use, Protection, Transmission, Storage, Disclosure, and Destruction of Employee Finger Scan Data:

The Templates related to employee finger scans are stored on the timekeeping system provided by our vendor, and, to the Hospital’s understanding, on the vendor’s backup systems. The Hospital and/or its vendor will protect the Templates using a reasonable standard of care for its industry and in a manner that is the same or exceeds the standards used to protect other confidential and sensitive information of employees. The Hospital will not sell, lease, trade, or otherwise profit from any information derived from or related to Templates. The Hospital will not disclose or disseminate data derived from or related to Template data unless: (a) written consent is obtained from the employee prior to the disclosure; (b) disclosure is necessary to make a financial transaction requested or authorized by the employee; or (c) disclosure is required by law, including by

a lawful warrant or subpoena.

Our vendor has represented that it does not sell, lease, trade, or profit from any data derived from or related to Template data, that it will not disclose or disseminate this data (except under the circumstances identified above), and that it uses reasonable standards of care within its industries for any storage, transmittal, or protection of such data.

Neither the Hospital's network nor the time clocks store an employee's Template. Instead, such information is maintained by our vendor.

Our vendor reports that it will promptly and permanently destroy any employee Template data once the employee is no longer enrolled in its time-keeping system or upon the request of the Hospital, which occurs within 45 days of the employee no longer being employed by Thorek or no longer using the timeclock for any other reason, whichever occurs earlier. Our timekeeping vendor has posted its Biometric Privacy Policy at <https://www.adp.com/-/media/adp/privacy/pdf/Biometric.pdf>.

If you have any questions about this policy, please contact Human Resources.

Please see the Consent and Release Form on the next page, the signing of which is a condition of employment at Thorek Memorial Hospital.

EMPLOYEE TIMEKEEPING CONSENT AND RELEASE

By signing below, I acknowledge that I have received, read, and understand Thorek Memorial Hospital's Employee Timekeeping Policy, and I consent to my use of the timeclocks provided by the Hospital. I also understand and consent to the collection, protection, use, transmission, storage, and destruction of my finger scan data, as described in the Employee Timekeeping Policy, including the transmission of such data to, and use and storage by, the Hospital or its timekeeping vendor, ADP, and its vendors and contractors. I understand and consent to the permanent destruction of my finger scan data from the timeclocks and timekeeping system within 45 days of when my employment ends or when the purpose for which the data was collected ceases to apply, whichever occurs earlier. I understand that a current version of the Policy may also be obtained from Human Resources and is posted on the Hospital's employee intranet (<http://webserver/thintranet/>) and the Hospital's webpage at thorek.org. I understand that the signing of this consent form is a condition of my employment with Thorek.

Print Name: _____

Signature: _____

Date: _____

Attachments

[ADP Biometric Information Privacy Policy.pdf](#)

Approval Signatures

Step Description	Approver	Date
CEO approval	Ned Budd: President/CEO	03/2021
Owner approval	Oanh Tran: HR Manager	03/2021