ABM BIOMETRIC INFORMATION RETENTION AND DESTRUCTION POLICY

ABM Industries Incorporated, its subsidiary companies and its third party electronic timekeeping vendors use biometric technology in order to identify employees on ABM’s electronic timekeeping systems and/or for building/facility security access. These systems capture a form of biometric information, extract unique data points known as “minutia”, and formulate a biometric template from that image which is then used to verify the employee’s identity. ABM’s systems, and the systems of ABM’s third party vendors, do not store images of an employee’s actual fingerprint scan, voiceprint, or facial scan. The minutia is retained for the duration of the employee’s employment and is permanently destroyed within ninety (90) days after the termination of the employee’s employment, unless a longer retention period is required by subpoena, warrant, court order or other legal requirement.