

HELGET GAS PRODUCTS, INC. BIOMETRIC INFORMATION RETENTION
SCHEDULE AND GUIDELINES FOR THE DESTRUCTION OF BIOMETRIC
INFORMATION AND BIOMETRIC IDENTIFIER POLICY STATEMENT
(the “Policy Statement”)

It is the policy of Helget Gas Products, Inc. (“HGP”) to collect, use, store and protect any biometric information or biometric identifiers (as defined below) in accordance with all applicable laws and regulations.

HGP utilizes drive-cams in its trucks to increase the situational awareness of its drivers, and to improve the safety of its drivers and the general public. HGP is presently using Zonar Systems, Inc. drive-cams. To the extent that any drive cams HGP uses are collecting Biometric Information or Biometric Identifiers, HGP has developed this Policy Statement.

1. Definitions

The following terms as used in this Policy Statement shall have the following meaning.

a. **“Biometric Information”** shall mean: (a) any information, regardless of how it is captured, converted, stored, or shared, based on an individual's biometric identifier used to identify an individual. Biometric information does not include information derived from items or procedures excluded under the definition of biometric identifiers.

b. **“Biometric Identifier”** shall mean a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. Biometric identifiers do not include writing samples, written signatures, photographs, human biological samples used for valid scientific testing or screening, demographic data, tattoo descriptions, or physical descriptions such as height, weight, hair color, or eye color. Biometric identifiers do not include donated organs, tissues, or parts as defined in the Illinois Anatomical Gift Act or blood or serum stored on behalf of recipients or potential recipients of living or cadaveric transplants and obtained or stored by a federally designated organ procurement agency. Biometric identifiers do not include biological materials regulated under the Illinois Genetic Information Privacy Act. Biometric identifiers do not include information captured from a patient in a health care setting or information collected, used, or stored for health care treatment, payment, or operations under the federal Health Insurance Portability and Accountability Act of 1996. Biometric identifiers do not include an X-ray, roentgen process, computed tomography, MRI, PET scan, mammography, or other image or film of the human anatomy used to diagnose, prognose, or treat an illness or other medical condition or to further validate scientific testing or screening.

Biometric Identifier shall also mean data generated by automatic measurements of an individual's biological characteristics, such as a fingerprint, voiceprint, eye retinas, irises, or other unique biological patterns or characteristics that is used to identify a specific individual. Biometric identifier does not include a physical or digital photograph, video or audio recording or data generated therefrom, or information collected, used, or stored for health care treatment, payment, or operations under the federal health insurance portability and accountability act of 1996.

2. Policy Statement

a. Retention Schedule

To the extent that HGP is in possession of any Biometric Information or Biometric Identifiers of its drivers, employees or independent contractors, HGP shall retain such biometric information or biometric identifiers only until the initial purpose for collecting or obtaining such biometric information or identifiers, namely for the drive-cam to make an assessment of its driver's behavior, has been satisfied (the "Retention Period"),

b. Destruction Guidelines

Upon the expiration of the Retention Period for Biometric Information or Identifiers that are in the possession of HGP, such Biometric Information or Identifiers shall be securely deleted by HGP or its vendor, such that through the deletion process the Biometric Information or Identifiers are permanently destroyed and no longer accessible on any device or medium upon which they reside or on which they were stored. It is the understanding of HGP that if the drive-cams it uses are collecting any Biometric Identifiers or Biometric Information, that such Biometric Identifiers or Biometric Information are only used by the drive-cam for the time period necessary for the drive-cam to process any Biometric Identifiers or Biometric Information and they do not leave the drive-cam device itself and are not stored in any retrievable manner and are overwritten each time the drive-cam is in use or deactivated.