BIOMETRIC DATA RETENTION AND DESTRUCTION POLICY

Bucher and Christian Consulting, Inc.

Effective Date: October 1, 2026

1. Purpose and Scope

This Biometric Data Retention and Destruction Policy (this "**Policy**") governs the collection, retention, use, and destruction of Biometric Identifiers and Biometric Information by BCforward (Bucher and Christian Consulting, Inc.), headquartered at 9777 N College Ave, Indianapolis, IN 46280 ("**BCforward**").

This Policy applies to all Biometric Data collected from contractors, employees, and other individuals in connection with identity verification processes conducted by or on behalf of BCforward.

BCforward adopts this Policy in compliance with the Illinois Biometric Information Privacy Act, 740 ILCS 14/1 et seq. ("**BIPA**"), the Texas Capture or Use of Biometric Identifier Act, Tex. Bus. & Com. Code § 503.001 ("**Texas CUBI**"), Washington RCW 19.375, and applicable Colorado biometric privacy requirements.

2. Definitions

For purposes of this Policy, the following terms shall have the meanings set forth below:

(a)"**Biometric Data**" means, collectively, Biometric Identifiers and Biometric Information.

(b)"**Biometric Identifier**" means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. Biometric Identifier does not include writing samples, written signatures, photographs (unless used to extract facial geometry), demographic data, tattoo descriptions, or physical descriptions such as height, weight, hair color, or eye color.

(c)"**Biometric Information**" means any information, regardless of how it is captured, converted, stored, or shared, based on an individual's Biometric Identifier used to identify an individual.

(d)"**Contractor**" means any individual engaged by BCforward for placement with a client or for the performance of services on behalf of BCforward.

(e)"**Destruction**" means the permanent and irreversible elimination of Biometric Data such that it cannot be recovered or reconstructed.

(f)"**Verification Provider**" means the third-party service provider engaged by BCforward to perform identity verification services involving Biometric Data. The current Verification Provider is Microblink USA LLC.

3. Types of Biometric Data Collected

BCforward collects the following categories of Biometric Identifiers and Biometric Information through its Verification Provider in connection with identity verification processes:

(a)Facial geometry data extracted from government-issued photo identification documents uploaded by the individual;

(b)Facial geometry data extracted from live facial scans captured during the verification process; and

(c)Biometric match and comparison results generated by comparing the facial geometry data described in items (a) and (b) above.

All Biometric Data identified in this Section 3 is collected and processed through the Verification Provider (currently Microblink USA LLC) on behalf of BCforward, subject to the contractual restrictions and obligations described in this Policy. In addition, where a client agreement or applicable law requires a fingerprint-based background check, BCforward may collect fingerprints through an authorized fingerprinting vendor or government agency, rather than through the Verification Provider, solely to complete that check. BCforward does not collect retina or iris scans.

4. Purpose of Collection

BCforward collects Biometric Data solely for the following permissible purposes:

(a) Identity verification during contractor onboarding for client placements;

(b) Compliance with client contractual requirements that mandate identity verification or fingerprint-based background checks;

(c) Identity fraud detection and prevention; and

(d) Re-verification of a Contractor's identity upon contract renewal, extension, client audit, or compliance review, including periodic and random identity checks required under a client agreement.

BCforward shall not collect, use, or store Biometric Data for any purpose other than those identified in this Section 4. If BCforward determines that a new purpose for collection is necessary, this Policy will be amended accordingly, and affected individuals will be notified and asked to provide consent as required by applicable law.

5. Disclosure to Third Parties

BCforward limits the disclosure of Biometric Identifiers and Biometric Information as follows:

(a) BCforward may disclose Biometric Data to the Verification Provider solely for the purpose of performing identity verification services as described in Section 4 of this Policy. The Verification Provider is contractually obligated to use such data exclusively for verification services and is prohibited from further disclosing it to any third party. BCforward may disclose fingerprints to its fingerprinting vendor and to the government agencies that conduct the applicable background check, solely to complete that check.

(b) BCforward does not sell, lease, trade, or profit from any individual's Biometric Identifiers or Biometric Information.

(c) BCforward may disclose Biometric Data without prior consent where required by applicable law, legal process, or in response to a valid warrant or subpoena issued by a court of competent jurisdiction.

6. Retention Schedule

BCforward shall retain Biometric Identifiers and Biometric Information only for the shorter of the following periods:

(a) One (1) year after the individual's last assignment or contractual relationship with BCforward ends; or

(b) Three (3) years following the individual's last interaction with BCforward.

Whichever period expires first shall govern. In all cases, BCforward shall destroy biometric data when the initial purpose for collecting or obtaining such data has been satisfied, even if the applicable retention period has not yet expired.

This retention schedule is designed to comply with BIPA's requirement that biometric data be destroyed when the purpose for collection is satisfied or within three (3) years of the individual's last interaction

(whichever occurs first), and with Texas CUBI's requirement that biometric data be destroyed within a reasonable time, not later than one (1) year after the purpose for collection expires.

7. Destruction Guidelines

Upon expiration of the applicable retention period set forth in Section 6, or upon satisfaction of the initial purpose for collection, BCforward shall permanently and irreversibly destroy all Biometric Identifiers and Biometric Information in its possession or control, as follows:

(a) Electronic records containing Biometric Data shall be securely deleted using industry-standard methods that render the data unrecoverable.

(b) Any tangible media containing Biometric Data shall be physically destroyed so that the data cannot be reconstructed or retrieved.

(c) BCforward shall direct the Verification Provider and any fingerprinting vendor to destroy all Biometric Data in its possession in accordance with this Policy and applicable contractual obligations.

(d) BCforward shall maintain a destruction log recording: (i) the date of destruction; (ii) the type of Biometric Data destroyed; and (iii) the method of destruction employed.

8. Data Security

8.1 Standard of Care. BCforward shall store, transmit, and protect Biometric Identifiers and Biometric Information using a standard of care no less protective than the standard BCforward applies to other confidential and sensitive information it maintains.

8.2 Minimum Safeguards. Security measures applied to biometric data shall include, at a minimum, the following:

(a) Encryption of biometric data in transit and at rest using industry-standard encryption protocols;

(b) Access controls limiting access to biometric data to authorized personnel who have a legitimate business need;

(c) Regular security assessments of systems and processes involved in the collection, storage, and transmission of biometric data; and

(d) Incident response procedures for the timely identification, investigation, and remediation of any unauthorized access to or acquisition of biometric data.

9. Individual Rights

Individuals whose Biometric Identifiers or Biometric Information have been collected by BCforward have the right to request information regarding BCforward's biometric data practices, including the specific categories of Biometric Data retained and the purposes for which such data is used.

All requests or inquiries regarding biometric data practices, including requests for information about the collection, retention, use, or destruction of an individual's Biometric Data, should be directed to:

BCforward Legal Department
9777 N College Ave
Indianapolis, IN 46280
Email: legal.email@bcforward.com

BCforward will respond to such requests within a reasonable time and in accordance with applicable law.

10. Policy Availability

In compliance with Section 15(a) of the Illinois Biometric Information Privacy Act (740 ILCS 14/15(a)) and other applicable state biometric privacy laws, this Policy is made publicly available to any individual whose Biometric Identifier or Biometric Information may be collected, retained, or used by BCforward.

A copy of this Policy may be obtained by any of the following methods:

(a) Contacting BCforward's Legal Department at legal.email@bcforward.com or 9777 N College Ave, Indianapolis, IN 46280; or

(b) Accessing the Policy online at https://www.bcforward.com/wp-content/uploads/2026/10/BCforward_Biometric_Data_Retention_and_Destruction_Policy.pdf.

BCforward will provide a copy of this Policy upon request without charge. Any updates or amendments to this Policy will be made available through the same channels within a reasonable time following adoption.

11. Policy Administration and Amendments

11.1 Effective Date. This Policy shall take effect on October 1, 2026. This Policy was last updated on November 4, 2026.

11.2 Annual Review. BCforward shall review this Policy at least annually and shall update it as necessary to reflect changes in applicable law, regulatory guidance, or BCforward's biometric data practices.

11.3 Administration and Enforcement. The Legal Department is responsible for the administration, interpretation, and enforcement of this Policy.

11.4 Contact Information. Questions regarding this Policy should be directed to BCforward's Legal Department at legal.email@bcforward.com.