



BOYS & GIRLS CLUB
OF THE ANTELOPE VALLEY

Biometric Data Privacy Policy

The organization utilizes biometric timekeeping technology to accurately record employee work hours. Biometric information is used solely to verify employee identity at the time of clock-in and clock-out.

Biometric Data Collection and Use

Biometric data collected by the organization:

- Is limited to an encrypted identifier derived from a biometric scan (facial geometry or similar template)
- Does **not** store photographs, fingerprint images, or raw biometric identifiers
- Is used exclusively for identity verification, payroll processing, timekeeping accuracy, workplace security, and fraud prevention
- Is not sold, traded, or otherwise disclosed to third parties except:
 - To ADP or ADP's authorized vendors for timekeeping and payroll processing, or
 - As required by law
- Biometric data is collected and processed through ADP and/or its authorized service providers.

Geolocation

In connection with timekeeping, the system may also record the date, time, and geolocation data of the device used to clock in or clock out. Geolocation information is collected solely for verifying work location, timekeeping accuracy, workplace security, fraud prevention, and compliance with organizational policies. Location data may be captured even if the clock-in or clock-out occurs outside of a designated club site location.

Data Protection and Security

The organization and ADP will use a reasonable standard of care to protect biometric data and will safeguard it using administrative, technical, and physical security measures consistent with the protection of other sensitive personal information.

Retention and Destruction

Biometric data will be retained only for as long as necessary to fulfill its timekeeping purpose and will be maintained only while:

- The employee remains active in the organization's timekeeping or HR systems, and
- Biometric timekeeping is being used for that employee

Biometric data will be permanently destroyed when any of the following occurs:

- The employee's employment ends
- The organization discontinues biometric timekeeping for that employee

- The employee submits a valid and approved request for destruction when permitted by applicable law
- Retention is no longer required under applicable legal or regulatory requirements

Destruction will occur in accordance with the organization's data retention practices and applicable privacy laws.

Employee Rights and Alternative Options

Employees who are unable or unwilling to participate in biometric timekeeping may request an alternative timekeeping method through Human Resources. Alternative arrangements must be requested and approved in advance.

To request an alternative or to ask questions regarding biometric data practices, employees should contact: **Claudia Galindo**, HR Director | hrdirector@avbgc.org

Retaliation against any employee for requesting information, raising concerns, or requesting an alternative related to biometric data is strictly prohibited.

Timekeeping Policy

The organization utilizes a biometric timekeeping system (facial scan) through ADP to accurately record employee work hours. The system includes geolocation features to verify that employees are clocking in and out from their assigned worksite or an approved work location. All non-exempt employees are required to record their own work time using the designated timekeeping device or kiosk at their assigned site/office location.

Employees are responsible for accurately recording all work time, including start time, end time, and meal periods/breaks where applicable. Recording time for another employee or allowing another employee to record your time is strictly prohibited.

Clock-In and Clock-Out Expectations

Employees may clock in no earlier than five (5) minutes before their scheduled start time and must clock out at the end of their scheduled shift unless otherwise approved by a supervisor. Employees must clock in and out at their assigned work location unless otherwise authorized. The ADP system uses geolocation to confirm the employee's location at the time of the punch. Clock-ins or clock-outs made outside of the assigned worksite or an approved location are subject to review, adjustments, or disciplinary action.

Employees will always be paid for all time actually worked in accordance with California law.

Grace Period and Tardiness

A five (5) minute grace period is provided before and after the scheduled start time. The purpose of the grace period is to allow for normal delays related to arriving at the timekeeping kiosk, brief traffic within the facility, or other minor, occasional circumstances. It is not intended to extend or adjust an employee's scheduled start time.

Employees are expected to be present, ready to work, and in their assigned area at their scheduled start time.

If an employee clocks in up to five (5) minutes before their scheduled start time, they will be paid for their actual clock-in time. Employees should not clock in more than five (5) minutes prior to their shift unless approved by a supervisor.

Repeated early clock-ins, even within the five-minute window, will be reviewed and addressed to ensure schedules and staffing needs are followed.

Clock-ins more than five (5) minutes after the scheduled start time will be recorded and paid based on the employee's actual clock-in time and will be considered tardy.

Consistent clock-ins after the scheduled start time, even within the grace period, may be addressed through coaching or corrective action.

Repeated tardiness or timekeeping concerns may result in corrective action in accordance with the organization's attendance standards.

Missed Punches and Time Corrections

If an employee forgets to clock in or out, or needs to request a correction to their time record:

1. The employee must submit a time correction request through the Time Kiosk/ADP application.
2. The request will be routed to the employee's direct supervisor for review.
3. If at a school site, the Site Coordinator (or designated site lead) must verify the employee's actual arrival and/or departure time before the correction is approved.
4. Corrections will be entered only after verification.

Failure to follow the time correction process may result in delays in payroll processing.

Repeated Missed Punches or Timekeeping Issues

Employees are expected to use the approved method for timekeeping consistently and accurately.

Repeated missed punches, late entries, unauthorized early clock-ins, location discrepancies, or failure to follow timekeeping procedures will be addressed through progressive corrective action, which may include:

- Coaching or reminder
- Written warning
- Further disciplinary action, up to and including termination

Corrective action will not result in the withholding of pay for time actually worked.

Prohibited Practices

The following are strictly prohibited:

- Clocking in or out for another employee
- Allowing another employee to record your time
- Falsifying time records
- Working off the clock
- Clocking in earlier than authorized without supervisor approval

- Clocking in or out from a location other than the assigned worksite or an approved location without authorization
- Attempting to bypass, manipulate, or disable the system's location or security features

Violations may result in disciplinary action, up to and including termination.

Supervisor Responsibilities

Supervisors are responsible for:

- Reviewing and approving time records and correction requests
- Ensuring Site Coordinator verification for missed punches
- Monitoring attendance and timekeeping compliance
- Addressing patterns of tardiness or timekeeping issues promptly

Transition from Manual Timekeeping

Manual sign-in sheets and employee-entered time will no longer be the primary method of time reporting once biometric timekeeping is implemented, except in limited situations approved by Human Resources. Employees approved for an alternative timekeeping method must follow the process established by Human Resources.