

DEPARTMENT	STANDARD	NUMBER
Associate Services	Biometric Data	222

**POLICY**

Omni Hotels & Resorts uses a biometric identification system for Associate timekeeping. Omni employs this system for the purpose of giving Associates secure access to Omni’s timekeeping technology and to document clock in/out times and location(s).

**PROCEDURE**

This biometric identification system minimizes the need for Associates to manually fill out daily forms, as well as improves the integrity of Omni’s timekeeping processes.

**A.** All new hire Associates will sign a Biometric Data Consent Form consenting to the collection and processing of biometric data for use with Omni’s biometric identification system.

**B. Collection and Processing**

- i.** Omni’s biometric identification system, developed by Kronos (Omni vendor), uses a temporary image of an Associate’s fingerprint to detect unique characteristics from the image.
- ii.** Kronos creates a digitized mathematical representation of the fingerprint characteristics, called a “template,” and permanently discards the image.
- iii.** Neither Omni nor Kronos retains or stores actual images of Associate fingerprints. Only the template is stored in a central database, as well as on the time clocks at the Associate’s property.
- iv.** Supplemental materials regarding the biometric data collection and processing will be provided to each Associate and are also available in the Associate Service Center or on the|connection.

**C. Retention and Destruction**

- i.** The template will be retained by Omni until an Associate’s voluntary or involuntary separation from Omni.
- ii.** After such separation, Omni will purge all of the Associate’s biometric information from the time clocks and from the database.

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## Ease Employees' Privacy Concerns about Biometric Technology



Biometric technology is quickly becoming the new standard for verifying employees' identities in the data collection process, which in turn contributes to more secure work environments. While the benefits of biometrics are well documented, employees are raising concerns about the way this technology could affect their privacy rights.

At Kronos, we understand and empathize with their apprehension. To address the issue, we developed our biometric terminal — the Kronos 4500 Touch ID™ terminal — with the specific intent to make sure employees' privacy is protected.

### Proven technology from industry leaders

The first step in designing the Kronos 4500 Touch ID was to choose our business partners based on their ability to provide privacy safeguards. We selected Bioscrypt, the industry-leading provider of biometric fingerprint technology, for the sole reason that its technology helps alleviate employees' privacy concerns. Bioscrypt is committed to providing the most secure biometric solutions possible and constantly searches for the latest advances in sensor technologies and software approaches to incorporate into its offerings.

### Fingerprint versus finger-scan technology

With Bioscrypt biometric technology at its core, an unaltered Kronos 4500 Touch ID terminal does not actually collect and store fingerprints. Instead, it saves a mathematical representation of employees' biometric data.

This distinction is critical because fingerprinting and finger-scanning technology are actually two very different technologies. Fingerprinting is the collection and storage of the fingerprint image. Today these fingerprint images are used by Automated Fingerprint Identification Systems (AFIS) for law enforcement or forensic purposes.

Finger-scanning technology — used in data collections terminals such as the Kronos 4500 Touch ID terminal — also acquires the fingerprint, but it doesn't retain the complete image. Instead, it stores particular data about the fingerprint in a much smaller template. So when the Kronos 4500 Touch ID terminal scans a finger, only a digital representation of the fingerprint is stored. As a result, it's virtually impossible to restore the original image.

### Important AFIS differences

Besides the disparities in fingerprinting and finger-scanning technology, the Kronos 4500 Touch ID terminal uses a different enhancement process than AFIS devices. The Kronos 4500 Touch ID preserves and enhances the ridge pattern from an employee's finger. Features such as scars, cuts, or creases are removed since they can appear or disappear from measurement to measurement and degrade the accuracy of the comparison.

AFIS devices are different because they employ minutia-based comparison techniques — using scars for example — as part of the comparison. Since these components are removed during our enhancement and compression process, the mathematical representation that serves as a Kronos 4500 Touch ID template is unsuitable for AFIS identification systems. This means employers can't access employees' past records, and they can't re-create their fingerprints for any purpose.

Figure 1. Alleviate Employees' Concerns with Finger-Scanning Technology.

Step 1: Employees' fingerprints are scanned — not stored — before biometric data is converted.



Step 2: The image is converted to a mathematical representation, which can't be used to re-create the actual fingerprint.

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1011010
0110101
1101000
0010110
1001011
0100011
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There are even more key differences that can help ease users' concerns:

- **Ridge versus minutia** — The Kronos 4500 Touch ID terminal relies on the ridge patterns in the core of the scanned finger, which does not contain minutia data in the scanned template. AFIS devices rely on the entire rolled fingerprint image to capture the minutia points in and around the core of the fingerprint.
- **Lower resolution** — The resolution required to define the fingerprint ridge pattern for the Kronos 4500 Touch ID terminal is 160 dots per inch (dpi); this is much lower than the 500 dpi resolution required by AFIS devices.
- **Smaller image size** — Our terminal uses solid-state sensors with active areas of less than 3/4" x 1/4". AFIS devices require a full measure of the fingerprint, which is typically a rolled fingerprint image.

### Biometric system accuracy and integrity

Employers and employees alike can rest assured that the Kronos 4500 Touch ID terminal is highly accurate and almost impossible to deceive. Several security components are integrated into all fingerprint sensors used within the Kronos 4500 Touch ID terminal. These include a dynamic optimization process that provides high fingerprint image resolution and quality for very low false acceptance rates and active anti-spoofing technology, which helps reject fake fingers. The combination of these technologies contributes to the most powerful biometric solution in the industry.

For example, the biometric technology used in the Kronos 4500 Touch ID terminal uses a sub-surface technology that images below the surface layer of the skin. Unlike other technologies such as DC capacitive, skin surface conditions do not limit the ability of the sensor to capture fingerprint data. Calluses, dryness, dirt, moisture, the effects of aging, or even contaminants have little or no effect because this technology captures the employee's live fingerprint from beneath the surface.

And with the active anti-spoofing technology, the Kronos 4500 Touch ID immediately detects the presence of fake fingers. Any attempt to place a surface-based fake finger — rubber stamps, finger molds, latex fingers, etc. — is rejected instantly because no image is acquired from the sensor.

The Kronos 4500 Touch ID terminal: Your solution for alleviating employees' privacy concerns about biometric technology.

- **Mathematical representations** — The Kronos 4500 Touch ID terminal technology doesn't store actual fingerprints, just mathematical representations.
- **Incompatible with AFIS devices** — The terminal uses unique resolution, fingerprint size, and image enhancement processes, which make all data virtually incompatible with AFIS.
- **Highly accurate** — The Kronos 4500 Touch ID terminal ensures fast, accurate identification and eliminates false reads.

For more information on biometric technology or the Kronos 4500 Touch ID terminal, please contact your local Kronos sales office.