

Privacy Policy for Rotunda HR App

1. Introduction

This App Privacy Notice explains how face data (biometric information) is collected and used when using applications developed by Rotunda Systems for employee time and attendance.

2. What Face Data We Collect

The app may collect:

- Facial images; and/or
- Biometric templates derived from facial images used to identify users during clock-in and clock-out.

3. Why We Collect Face Data

Face data is used solely to:

- Verify user identity during clock-in and clock-out;
- Prevent time fraud (e.g. “buddy punching”);
- Ensure accurate payroll processing; and
- Support workforce management systems.

Face data is **not used for marketing, advertising, or profiling.**

4. Whether Face Data is Stored

Face data is **temporarily stored** as part of the system.
Face data is **not stored indefinitely.**

5. How Long Face Data is Stored

Face data is retained for **up to 30 days**;
After this period, it is **automatically deleted**;
Data may be retained longer only where necessary for:

- payroll verification
- dispute resolution
- legal compliance

6. Sharing of Face Data

Face data is processed:

- By Rotunda Systems (as a technology provider); and
- On behalf of the client organisation (data controller).

Face data is **not sold or shared for marketing purposes.**

7. Third-Party Storage of Face Data

Rotunda Systems may store face data:

- Only as required to provide the service;
- Under strict contractual obligations;
- Using secure, encrypted systems; and
- In line with defined retention periods (maximum 30 days unless otherwise required).

8. Security of Face Data

Face data is protected through:

- Encryption (in transit and at rest)
- Restricted access controls
- Audit logging
- Regular deletion processes

9. Your Rights

Users have rights including:

- Access to their data
- Request deletion (where applicable)
- Object to processing
- Lodge a complaint with a supervisory authority

10. Contact

For questions, contact:

Rotunda Systems / Data Protection Officer

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