

GEOLOCATION DATA COLLECTION: TECHNICAL INFORMATION

Version:	1.0
Date of version:	February 27, 2020
Created by:	Jon Olson, Director of Product Management Mike Muha, Chief Information Security & Privacy Officer
Approved by:	
Owner:	Mike Muha, Chief Information Security & Privacy Officer
Confidentiality level:	Public

Change History

Date	Version	Created By	Description of Change
February 27, 2020	1.0	Jon Olson and Michael J. Muha	Original draft

Contents

- 1. ABOUT THIS DOCUMENT 4**
 - 1.1 INTENDED AUDIENCE 4
 - 1.2 DEFINITIONS 4
 - 1.3 PURPOSE 4
 - 1.4 RELATED DOCUMENTS 4

- 2. COLLECTION AND USE OF GEOLOCATION DATA..... 4**
 - 2.1 TYPES OF GEOLOCATION DATA 4
 - 2.2 WHY WOULD GEOLOCATION DATA BE COLLECTED? 5
 - 2.3 WHAT DEVICES OR APPLICATIONS COLLECT GEOLOCATION DATA?..... 5
 - 2.4 CAN THE USER PREVENT THE COLLECTION OF GEOLOCATION DATA? 5
 - 2.5 HOW IS GEOLOCATION DATA COLLECTED? 5
 - 2.6 WHO HAS ACCESS TO GEOLOCATION DATA?..... 6
 - 2.7 WHO OWNS THE GEOLOCATION DATA? 6

1. About this Document

1.1 Intended Audience

This document is intended for all individuals involved in determining the business need for the collection of geolocation data, individuals involved in implementation and support of devices or applications that collect geolocation data, and for individuals whose geolocation data is collected.

1.2 Definitions

WorkForce Software is a company engaged in the design, development, deployment and support of software solutions and services related to workforce management.

The WorkForce Suite is a SaaS based workforce management solution developed by WorkForce Software; the WorkForce Suite includes a number of software components commonly found in workforce management solutions including but not limited to time and attendance management, leave absence and accommodations management, scheduling, data capture, employee engagement and self service capabilities related to time.

1.3 Purpose

This document outlines how and when the WorkForce Suite uses geolocation data.

1.4 Related Documents

A Privacy Notice about data collected by the WorkForce Suite can be found at <https://www.workforcesoftware.com/privacy-products/>

2. Collection and use of Geolocation Data

WorkForce Software views personal location data as “personal information” and recommend that any WorkForce Software customers have geolocation policies similar to biometric policies.

WorkForce Software also have policies and guidance in place to ensure that location data is only collected on an as-needed basis and with user consent.

Geolocation data is collected based on the performance of a contract with our customer organization.

Data is only processed by Workforce Software per the instructions from the customer organization (contractual agreement).

2.1 Types of Geolocation Data

The WorkForce Suite can be configured to collect geolocation data. The following table describes common geolocation-related terms and describes how they apply to the WorkForce Suite.

Geolocation	The latitude and longitude coordinates indicating the current location of a device. This would indicate a single point on a map.
--------------------	--

Geofence	A space described with latitude and longitude coordinates to describe an area where time collection is intended to occur. This can be based on a single point with a radius or a rectangular space described using multiple points to describe the area. This would indicate a defined area on a map.
Geosensing	Geosensing is the proactive gathering of location data to modify application behavior. The WorkForce Suite does not use geosensing.

2.2 Why would geolocation data be collected?

The customer organization determines why geolocation data is collected in line with their processes and policies.

Typically, customer organizations choose to collect geolocation data to determine if a time registration is “valid” and an user generated time registration event takes place in an expected physical location, for example a user “clocking in” for an agreed period of work at the correct work location.

2.3 What devices or applications collect geolocation data?

Geolocation data can be collected using:

1. The mobile application provided as part of the WorkForce Suite. The application can be installed on Android or Apple mobile devices (e.g., iPhones), or accessed through a web browser.
2. The Mobile Time Clock web application provided as part of the WorkForce Suite. The application can run in a web browser on a phone, tablet, or PC.

2.4 Can the user prevent the collection of geolocation data?

Yes. Users of the WorkForce Suite can deny access to location data. The browser or mobile application will notify the user if any application is trying to access their geolocation data. The user must then opt-in to “Allow” access before any geolocation data can be accessed on the device.

The user of the mobile application and Mobile Time Clock have complete control over whether or not geolocation data is captured and shared.

2.5 How is geolocation data collected?

Geolocation data is collected when a time registration event occurs. A time registration event (for example clocking in or clocking out for an agreed period of work) is a user-initiated event indicating that work is being started or stopped, or that an employee is transferring into a different classification of work for example switching from job A to job B.

When a time registration event occurs the current geolocation data is attached to the time registration and sent to the WorkForce Suite.

No other geolocation information is sent to the WorkForce Suite at any time without a specific action being taken by the user.

The WorkForce Suite does not track user movements and share that information, only the geolocation of the user at the point in time the user initiates the time registration event is transmitted from the mobile application or Mobile Time Clock.

The WorkForce Suite inspects the geolocation data from the time registration event and may be configured to trigger an alert if geolocation data from the time registration event is not present or is outside one of the geofence zones¹ defined by the administrator of the WorkForce Suite in the customer organisation. This is optional and may be configured at the sole discretion of the customer organisation.

The WorkForce Suite does not passively track geolocation and generate alerts based on that geolocation data.

2.6 Who has access to geolocation data?

Authorized staff of the customer organization can see a map showing the location of the user when a “time registration” event was recorded.

Authorized WorkForce Software staff, as part of providing support for WorkForce Suite, can also see the employee’s location when a “time registration” event occurs.

2.7 Who owns the geolocation data?

The customer organization “owns” all data collected by the WorkForce Suite. Employees may have specific privacy rights related to the data. These rights may vary by state or country.

WorkForce Software is contractually prohibited from using the geolocation data for any purpose other than the service we provide to the customer organization.

At the end of the contract, WorkForce Software returns all data back to the customer organization (if requested) and deletes that data from all systems and backups. It cannot be recovered.

¹ The WorkForce Suite uses geofence zones in a distinctly different and much more limited way than other geofencing implementations. For example, the “Find My” app on iOS has the ability to notify people when someone leaves a location. The WorkForce Suite does not have this functionality.