

Biometric Information Security Policy

Policy Number: 5.25

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Cross Reference:

1. PURPOSE

- 1.1. This Biometric Information and Security Policy ("Policy") defines CTF ILLINOIS' policy and procedures for collection, use, safeguarding, storage, retention, and destruction of biometric data collected by CTF ILLINOIS.
- 1.2. CTF ILLINOIS uses biometric identification systems for employee timekeeping with regard to payroll. CTF ILLINOIS collects, stores, and uses employee biometric data for the purpose of giving employees secure access to CTF ILLINOIS' timekeeping systems and to document employees' (i) clock in/out time(s); (ii) clock in/out location(s); and (3) attempts/failures/errors in biometric data scans.

2. POLICY STATEMENT

- 2.1. This Policy replaces and supersedes all previous policies related to biometric information. CTF ILLINOIS reserves the right to amend this Policy at any time, without notice. CTF ILLINOIS may expand its use of biometric data in the future.
- 2.2. In the event CTF ILLINOIS begins collecting biometric data for any additional purpose, CTF ILLINOIS will update this Policy.
- 2.3. A copy of this document can be found in our Employee Handbook, and will be made available to the public at www.ctfillinois.org or "upon request".

3. DEFINITION OF BIOMETRIC DATA

- 3.1. Biometric data means personal information stored by CTF ILLINOIS about an individual's physical characteristics that can be used to identify that person. Biometric data specifically includes fingerprints.
- 3.2. As technology and systems advance, biometric data may also include voiceprints, retina or iris scan, or scan of hand or face geometry.

4. POLICY

- 4.1. CTF ILLINOIS' policy is to protect and store biometric data in accordance with applicable standards and laws including, but not limited to, the Illinois Biometric Information Privacy Act.
- 4.2. An individual's biometric data will not be collected or otherwise obtained by CTF ILLINOIS without prior written consent of the individual. CTF ILLINOIS will inform the employee of the reason his or her biometric information is being collected and the length of time the data will be stored. A sample consent statement is included in this policy and will be tailored to fit the type of biometric data collected and purpose(s) for collection.
- 4.3. CTF ILLINOIS will not sell, lease, trade, or otherwise profit from an individual's biometric data. Biometric data will not be disclosed by CTF ILLINOIS unless (i) consent is obtained, (ii) required by law, or (iii) required by valid legal subpoena.

- 4.4. Biometric data will be stored using a reasonable standard of care for CTF ILLINOIS' industry and in a manner that is the same or exceeds the standards used to protect other confidential and sensitive information held by CTF ILLINOIS.
- 4.5. CTF ILLINOIS will destroy biometric data within a reasonable period of time of when the purpose for obtaining or collecting such data has been fulfilled. Generally, this means within six (6) months of an employee's termination of employment.

5. PROCEDURE

- 5.1. Prior to collecting an employee's biometric data, CTF ILLINOIS will obtain the consent of the employee.
- 5.2. Employees will have their biometric data registered.
- 5.3. When an employee uses a biometric data identification system, they are identified by the last 4 digits of their social security number followed by an additional number (i.e. 0, 1, 2). The biometric data cannot be regenerated from the digital data.
- 5.4. CTF ILLINOIS will store, transmit, and protect biometric data using the same standard of care and security controls it provides other confidential and sensitive information in its possession. Biometric data is securely stored on a stand-alone server. No CTF ILLINOIS employee will have direct access to biometric data.
- 5.5. CTF ILLINOIS will delete from its systems the biometric data of former employees on a biannual basis.

6. CONSENT TO COLLECTION OF BIOMETRIC DATA

Your fingerprint will be collected and stored by CTF ILLINOIS for the purpose of verifying your identity for access to the CTF ILLINOIS timekeeping system. Your fingerprint data will not be disclosed by CTF ILLINOIS without your consent unless the disclosure is required by law or by valid legal subpoena. Your fingerprint data will be permanently deleted from CTF ILLINOIS' systems within a reasonable period after your termination of employment pursuant to the Company's biometric data retention policy. A copy of CTF ILLINOIS' Biometric Information Security Policy is available upon request and is posted at: www.ctfillinois.org.

By signing below, you consent to	CTF ILLINOIS'	collection, u	ıse, an	d storage	of your	finger print	for the
above defined purpose.							

Print Name:		
Signed:	Date:	
Cc: Signed Copy to Personnel File		