biometric information policy

this policy may be legally essential

PURPOSE

This Biometric Information and Security Policy (“Policy”) defines ABC COMPANY’S policy and procedures for collection, use, safeguarding, storage, retention and destruction of biometric data collected by ABC Company.

ABC COMPANY uses biometric identification systems for employee timekeeping with regard to payroll. ABC COMPANY collects, stores and uses employee biometric data for the purpose of giving employees secure access to ABC COMPANY’S timekeeping systems and to document employees’:

* clock in/out time(s);
* clock in/out location(s); and
* attempts/failures/errors in biometric data scans.

POLICY STATEMENT

This Policy replaces and supersedes all previous policies related to biometric information. ABC COMPANY reserves the right to amend this Policy at any time, without notice. ABC COMPANY may expand its use of biometric data in the future.

In the event ABC COMPANY begins collecting biometric data for any additional purpose, ABC COMPANY will update this Policy.

A copy of this document can be found in our Policies and Procedures Manual, and will be made available to the public “upon request” of the Company’s Human Resources Department.

DEFINITION OF BIOMETRIC DATA

Biometric data means personal information stored by ABC COMPANY about an individual’s physical characteristics that can be used to identify that person. Biometric data specifically includes fingerprints.

As technology and systems advance, biometric data may also include voiceprints, retina or iris scan, or scan of hand or face geometry.

POLICY

ABC COMPANY’S 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.

An individual’s biometric data will not be collected or otherwise obtained by ABC COMPANY without prior written consent of the individual. ABC COMPANY 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.

ABC COMPANY will not sell, lease, trade or otherwise profit from an individual’s biometric data. Biometric data will not be disclosed by ABC COMPANY unless:

* consent is obtained
* required by law, or
* required by valid legal subpoena.

Biometric data will be stored using a reasonable standard of care for ABC COMPANY’S industry and in a manner that is the same or exceeds the standards used to protect other confidential and sensitive information held by ABC COMPANY.

ABC COMPANY 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.

PROCEDURE

Prior to collecting an employee’s biometric data, ABC COMPANY will obtain the consent of the employee.

Employees will have their biometric data registered.

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.

ABC COMPANY 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 ABC COMPANY employee will have direct access to biometric data.

ABC COMPANY will delete from its systems the biometric data of former employees on a biannual basis.

CONSENT TO COLLECTION OF BIOMETRIC DATA

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

By signing below, you consent to ABC COMPANY’S collection, use, and storage of your fingerprint for the above defined purpose.

Print Name:

Signed: Date: