

## **BIOMETRIC DATA POLICY**

**Purpose.** This Biometric Data Policy (“Policy”) establishes **IHA HUMAN CAPITAL SERVICES, INC. (“IHA HCS”)** expectations regarding the use of systems that collect Biometric Data. The Policy is intended to comply with and exceed current Biometric Data laws.

**Definitions.** **Biometric Identifier** means an individual’s physical, biological, or behavioral characteristics. Biometric Data includes DNA; fingerprints; voiceprints; images of the iris, fingerprint, face, hand, palm, vein patterns, and voice recordings from which an identifier template can be extracted; keystroke patterns or rhythms; gait patterns or rhythms; speech patterns or rhythms; body order; retina or iris scans; scans of hand or face geometry; and sleep, health, or exercise data that contain identifying information.

**Biometric Information** means any information, regardless of how it is captured, converted, stored, or shared, based on an individual’s biometric identifier that is used to identify an individual.

**Biometric Data** means Biometric Identifiers and Biometric Information.

**Policy.** Because Biometric Data laws are complex and can vary state to state, IHA HCS prohibits the collection, use, storage, possession, transmission, or disclosure of Biometric Data, as well as obtaining Biometric Data through any other means, other than approved by the Legal Department. This prohibition applies to IHA HCS’s use of its live scan fingerprint system (“LiveScan Enrollment Station”) and its clients use of a leased LiveScan Enrollment Station from IHA HCS to collect fingerprints of IHA HCS’s clients’ applicants, employees, volunteers, and contractors (collectively “Individuals”) for purposes of obtaining a fingerprint-based background check for employment purposes from IHA HCS (“Background Check”).

IHA HCS or its clients will only collect, use, store, possess, transmit or disclose Biometric Data for purposes of obtaining a Background Check if the following standards are met:

- IHA HCS has policies and procedures in place that protect Biometric Data from unauthorized access, acquisition, destruction, use, modification, or disclosure in accordance with applicable standards and laws including, but not limited to, the Illinois Biometric Information Privacy Act (“BIPA”);
- IHA HCS will not collect, capture, purchase, receive through trade, or otherwise obtain an Individual’s Biometric Data without the prior written consent of the Individual;
- IHA HCS will inform Individuals, in writing, that Biometric Data is being collected and stored by IHA HCS and the purpose and length of term for which the Biometric Data is being stored and used;
- IHA HCS will not sell, lease, trade, or otherwise profit from an Individual’s Biometric Data;
- An Individual’s Biometric Data will not be disclosed, redisclosed, or otherwise disseminated unless (i) consent is obtained from the Individual, or (ii) such disclosure or redisclosure completes a pay transaction authorized by the Individual, or (iii) such disclosure or redisclosure is required by law or by valid legal subpoena;
- Biometric Data will be stored, transmitted, and protected from disclosure using a reasonable standard of care and in a manner that is the same or exceeds the standards used to store, transmit, and protect other confidential and sensitive information held by IHA HCS;
- IHA HCS will permanently destroy Biometric Data it possesses within a reasonable period of time of when the purpose for obtaining or collecting such data has been fulfilled, but no later than thirty (30) days from IHA HCS’s delivery of the Background Check that results from use of an Individual’s Biometric Data to its client, unless IHA HCS is required under a government contract to retain the data.
- IHA HCS clients leasing a LiveScan Enrollment Station from IHA HCS will be prohibited from collecting an Individual’s fingerprint for purposes of obtaining a Background Check unless pursuant to an valid, unexpired service agreement with IHA HCS to receive Background Checks and then only in accordance with that service agreement and BIPA.

**Questions About the Policy.** A copy of this document can be found in the IHA HCS’ internal policy library, and will be made available to the public at <https://www.team-ihc.org/> or upon request. For all questions relating to this policy or approval to use Biometric Data, please contact [MWoods@team-ihc.org](mailto:MWoods@team-ihc.org).