



Biometric Information Security Policy

Policy Number: 402
Original Issue Date: 9/28/2017
Revision History: Original Policy

PURPOSE

This Biometric Information and Security Policy (“Policy”) defines DSC’s policy and procedures for collection, use, safeguarding, storage, retention, and destruction of biometric data collected by DSC. DSC uses biometric identification systems for employee timekeeping with regard to payroll. DSC collects, stores, and uses employee biometric data for the purpose of giving employees secure access to DSC’s 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.

POLICY STATEMENT

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

In the event DSC begins collecting biometric data for any additional purpose, DSC will update this Policy. A copy of this document can be found in our Employee Handbook, and will be made available to the public at www.dsc-illinois.org or “upon request”.

DEFINITION OF BIOMETRIC DATA

Biometric data means personal information stored by DSC 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

DSC’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 DSC without prior written consent of the individual. DSC 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. At present, the fingerprint information will only be used for timekeeping purposes.

DSC will not sell, lease, trade, or otherwise profit from an individual’s biometric data. Biometric data will not be disclosed by DSC unless (i) consent is obtained, (ii) required by law, or (iii) required by valid legal

subpoena. DSC will object to any subpoena issued to require the release of this information, to require the requestor to show why the information is necessary.

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

DSC will destroy biometric data within a reasonable period of time or when the purpose for obtaining or collecting such data has been fulfilled.

PROCEDURE

Prior to collecting an employee's biometric data, DSC 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.

DSC 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 DSC employee will have direct access to biometric data.

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

By signing below, you consent to DSC's collection, use, and storage of your fingerprint for the above defined purpose.

Print Name: _____

Signed: _____

Date: _____

Cc: Signed Copy to Personnel File