



## **Biometric Information Privacy Policy**

Independent Schools Association of the Central States (“ISACS”) collects certain biometric data from employees. This policy explains what information ISACS collects, how this information is used, how it is stored, safeguarded, retained, and disposed of.

### **Biometric Data Collected by ISACS**

“Biometric identifier” means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. Biometric identifiers do not include writing samples, written signatures, photographs, human biological samples used for valid scientific testing or screening, demographic data, tattoo descriptions, or physical descriptions such as height, weight, hair color, or eye color. Biometric identifiers do not include information captured from a patient in a health care setting or information collected, used, or stored for health care treatment, payment, or operations under the federal Health Insurance Portability and Accountability Act of 1996.

“Biometric information” means any information, regardless of how it is captured, converted, stored, or shared, based on an individual’s biometric identifier used to identify an individual. Biometric information does not include information derived from items or procedures excluded under the definition of biometric identifiers.

ISACS’s is providing such biometric data to Association Technologies, Inc., a third-party technology provider that allows employees to utilize Windows Hello for Business as part of their assigned Windows computer. Such biometric data may be collected by face, eye, and/or finger or thumb print scanners for security verification purposes on Windows computers.

### **Consent to Collection**

An individual’s biometric data will not be collected or otherwise obtained by ISACS without prior written consent of the individual. ISACS will inform the individual of the reason for collecting any biometric information, and of the length of time the data will be stored. ISACS employees may be required to use ISACS’s scanners, which require use of a face, eye, and/or finger or thumb scan. Employees who elect to continue employment with ISACS consent to the collection, storage, and use of their biometric information for purposes of identification and security verification through Windows Hello for Business.

### **Privacy of Biometric Data**

ISACS stores all biometric data in accordance with applicable standards and laws.

ISACS will not sell, lease, trade, or otherwise profit from an employee’s biometric data.

An employee's biometric data will not be disclosed, redisclosed or disseminated unless the employee (or the employee's legally authorized representative) consents, the disclosure or redisclosure is necessary to complete a financial transaction requested or authorized by the employee or their legal representative, the disclosure is required by law, or the disclosure is required by a valid warrant or subpoena. Biometric data associated with security verification on employee Window's computers may be transmitted and stored via systems operated, maintained, and controlled by a third-party vendor.

Biometric data will be stored, transmitted, and protected using a reasonable standard of care for ISACS's industry, in a manner that is the same as or that exceeds the standards of care used to protect other confidential information held by ISACS. This includes, among other things, restricting access to biometric data to authorized ISACS employees or vendors who have a business need to access the information, and using reasonable technological means to prevent unauthorized access to the information.

#### **Retention and Destruction of Biometric Data**

ISACS will retain employee biometric data, and shall ensure that Association Technologies, Inc. permanently destroy such data either at the termination of the employee's employment, or within 3 years of the employee's last interaction with ISACS.

#### **Distribution and Updates**

A copy of this policy will be made publicly available at <https://www.isacs.org/about-isacs/policies-procedures>.

ISACS will update this policy if it begins collecting biometric data for any other purposes. ISACS reserves the right to amend this policy at any time.