

## **Olivet Nazarene University Biometric Privacy Policy**

Olivet Nazarene University (“Olivet Nazarene” or “the University”) may use biometric identification systems to increase security, control access to certain campus facilities, and other specialized uses.

The University recognizes the sensitivity of Biometric Data, as defined below, and takes seriously its obligations to maintain the confidentiality of this data and protect its security in accordance with various regulatory obligations and in fulfillment of its stewardship of information provided to it by students, employees, and other constituents.

### **Policy Statement**

Wherever the University implements systems utilizing Biometric Data, it will implement suitable controls and take other appropriate steps to protect the security and privacy of this data in accordance with appropriate regulatory and other relevant obligations.

### **Purpose**

In accordance with the Illinois Biometric Privacy Act, 740 ILCS 14/1 et seq., and other laws and regulations, the policy sets forth the University’s procedures for disclosure, storage, and destruction of Biometric Data, as defined below.

The University, its vendors, and/or the licensor of the University’s biometric identification systems may collect, store, and use facial shape or a scan of face geometry data for security, identification, and to control access to certain campus facilities.

The University, its vendors, and/or the licensor of the University’s biometric identification systems will not sell, lease, trade, or otherwise profit from biometric data collected; provided, however, the University’s vendors and any licensor of the University’s biometric identification systems may be paid for products or services used by the University that utilize such biometric data.

### **Scope**

The scope of this policy includes students, faculty, staff, other relevant constituents, and relevant third-party contractors.

### **Definitions**

- **Biometric Identifier.** A retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry.

- **Biometric Information.** Information, regardless of how it is captured, converted, stored, or shared, based on an individual's biometric identifier used to identify an individual.
- **Biometric Data. Personal information stored by the University regarding an individual's physical characteristics that can be used to identify a person, such as fingerprints, voiceprints, facial shape, or scan of hand or face geometry.** A collective term for biometric identifier and biometric information.

## **Implementation**

### **I. Consent**

To the extent that the University, its vendors, and/or the licensor of the University's biometric identification systems collect, capture, or otherwise obtain biometric data relating to an individual, the University must first:

Inform the individual in writing that the University, its vendors, and/or the licensor of the University's biometric identification systems are collecting, capturing, or otherwise obtaining the individual's biometric data, and that the University is providing such biometric data to its vendors and the licensor of the University's remote testing software;

Inform the individual in writing of the specific purpose and length of time for which the individual's biometric data is being collected, stored, and used; and

1. Receive a written release signed by the individual (or his or her legally authorized representative) authorizing the University, its vendors, and/or the licensor of the University's biometric identification systems to collect, store, and use the individual's biometric data for the specific purposes disclosed by the University, and for the University to provide such biometric data to its vendors and the licensor of the University's remote testing software.

An individual's Biometric Data will not be collected or otherwise obtained by Olivet Nazarene University without prior written consent of the individual. The consent form will inform the individual of the specific reason the Biometric Data is being collected and the length of time the data will be stored.

### **II. Disclosure**

In circumstances where Olivet Nazarene retains Biometric Data, the University will not disclose or disseminate any Biometric Data to any third party unless:

- a. Disclosure is required by state or federal law or municipal ordinance;

- b. Disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction;
- c. The disclosed data completes a financial transaction requested or authorized by the student, employee, or other constituent; or
- d. The student, employee, or other constituent has consented to such disclosure or dissemination.

### **III. Storage**

In circumstances where Olivet Nazarene retains Biometric Data, the University will use a reasonable standard of care to store, transmit and protect from disclosure any paper or electronic Biometric Data collected. Storage, transmission, and protection from disclosure shall be performed in a manner that is the same as or more protective than the manner in which the University stores, transmits and protects from disclosure other confidential and sensitive information that is used to uniquely identify an individual, including personal information that can be used to uniquely identify an individual or an individual's account or property, such as genetic markers, genetic testing information, account numbers, PINs, driver's license numbers and social security numbers.

### **IV. Retention Schedule**

In circumstances where Olivet Nazarene retains Biometric Data, the University, its vendors and/or licensor of the biometric identification systems will permanently destroy an individual's Biometric Data when the initial purpose for collecting or obtaining such Biometric Data has been satisfied, such as:

- a. The employee's employment is terminated;
- b. The student graduates or otherwise leaves the University;
- c. An athlete is no longer a member of an athletic team that uses Biometric Data;
- d. The employee transfers to a position for which the Biometric Data is not used; or
- e. The University no longer uses the Biometric Data.

In no situation will biometric data be retained for more than three years after a student's last interaction with the University, unless otherwise required by law.

### **V. Vendors and/or Licensors**

If any of the University's vendors and/or licensors require access to Biometric Data from the University in order to satisfy any contractually obligated performance on behalf of the University, the University will require that they shall protect the data in a manner that is the same as or more protective than the above defined disclosure, storage and retention schedule sections, unless other specific arrangements are necessary to satisfy contractual and legal obligations.

### **Enforcement**

This policy will be enforced in a collaborative approach across the University, including:

- Information Services;
- Departmental personnel;
- Other University personnel

### **Policy Distribution and Updates**

A copy of this policy will be made publicly available at <https://www.olivet.edu/legal/privacy/>.

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

