

OPEN DOOR REHABILITATION CENTER
BIOMETRIC INFORMATION SECURITY POLICY

1. PURPOSE

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

2. POLICY STATEMENT

- 2.1. This Policy replaces and supersedes all previous policies related to biometric information. Open Door Rehabilitation Center reserves the right to amend this Policy at any time, without notice. Open Door Rehabilitation Center may expand its use of biometric data in the future.
- 2.2. In the event Open Door Rehabilitation Center begins collecting biometric data for any additional purpose, Open Door Rehabilitation Center will update this Policy.
- 2.3. A copy of this document can be found in our Employee Handbook, and will be made available to the public at www.odrc.org.

3. DEFINITION OF BIOMETRIC DATA

- 3.1. Biometric data means personal information stored by Open Door Rehabilitation Center about an individual’s physical characteristics that can be used to identify that person. Biometric data specifically includes fingerprints.
- 3.2. As technology and systems advance, biometric data may also include voiceprints, retina or iris scan, or scan of hand or face geometry.

4. POLICY

- 4.1. Open Door Rehabilitation Center’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.
- 4.2. An individual’s biometric data will not be collected or otherwise obtained by Open Door Rehabilitation Center without prior written consent of the individual. Open Door Rehabilitation Center 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.
- 4.3. Open Door Rehabilitation Center will not sell, lease, trade, or otherwise profit from an individual’s biometric data. Biometric data will not be disclosed Open Door Rehabilitation Center unless (i) consent is obtained, (ii) required by law, or (iii) required by valid legal subpoena.
- 4.4. Biometric data will be stored using a reasonable standard of care for Open Door Rehabilitation Center’s industry and in a manner that is the same or exceeds the standards used to protect other confidential and sensitive information held by Open Door Rehabilitation Center.

- 4.5. Open Door Rehabilitation Center 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.

5. PROCEDURE

- 5.1. Prior to collecting an employee's biometric data, Open Door Rehabilitation Center will obtain the consent of the employee.
- 5.2. Employees will have their biometric data registered.
- 5.3. When an employee uses a biometric data identification system, they are identified by the last 4 digits of their social security number preceded by a 0 or 1. The biometric data itself is not recorded or stored, and cannot be regenerated from the digital data.
- 5.4. Open Door Rehabilitation Center 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 network domain controller. No Open Door Rehabilitation Center employee will have direct access to biometric data.
- 5.5. Open Door Rehabilitation Center will delete from its systems the biometric data of former employees on a biannual basis.