


**Smith Senior Living
Chicago, Illinois**

Subject: Biometric Information Security Policy
Scope of Practice: Smith Village, Smith Cares, Smith Crossing & Smith Senior Living
Submitted By: HR Director
Approved By: 
Signature of President/CEO
Effective Date: October 2017
Revision Dates:

I. Purpose:

To define the policy and procedures for collection, use, safeguarding, storage, retention, and destruction of biometric data collected by SMITH SENIOR LIVING.

DEFINITIONS

“Biometric data” means any personal information stored by SMITH SENIOR LIVING about an individual’s physical characteristics that can be used to identify that person, regardless of how it is captured, converted, stored or shared. Biometric data can include fingerprints, voiceprints, scans of hand or face geometry or retina or iris scans.

II. Policy:

- SMITH SENIOR LIVING’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, 740 ILCS 14/1, *et seq.* (eff. 10/3/2008).
- An individual’s biometric data will not be collected or otherwise obtained by SMITH SENIOR LIVING without prior written consent of the individual. SMITH SENIOR LIVING will inform the individual of the reason his or her biometric information is being collected and the length of time the data will be stored. A consent statement is included as Appendix A to this policy and tailored to fit the type of biometric data collected.
- SMITH SENIOR LIVING will not sell, lease, trade, or otherwise profit from an individual’s biometric data.
- Biometric data will not be disclosed by SMITH SENIOR LIVING unless: (a) consent is obtained; (b) disclosure is necessary to complete a financial transaction requested or authorized by the

subject; (c) disclosure is required by law; or, (d) disclosure is required by subpoena.

- Biometric data will be stored using a reasonable standard of care for SMITH SENIOR LIVING's industry and in a manner that is the same or exceeds the standards used to protect other confidential information held by SMITH SENIOR LIVING.
- SMITH SENIOR LIVING will destroy biometric data when the initial purpose for obtaining or collecting such data has been fulfilled.
- SMITH SENIOR LIVING reserves the right to amend this Biometric Information Security Policy at any time.
- A copy of this policy will be made available to the public at <http://smithseniorliving.org/>.

III. Procedure:

1. SMITH SENIOR LIVING collects, stores, and uses employee fingerprint data for the purpose of authenticating and tracking the time worked by employees at SMITH SENIOR LIVING's business locations. Fingerprint data may also be collected and used to provide access to these business locations.
2. Prior to collecting an employee's fingerprint data, SMITH SENIOR LIVING will obtain the consent of the employee.
3. SMITH SENIOR LIVING will store, transmit, and protect biometric data using the same standard of care and security controls it provides protected health information in its possession.
4. SMITH SENIOR LIVING's information technology department will permanently destroy an employee's biometric information from SMITH SENIOR LIVING's systems and request that any third-party administrator of SMITH SENIOR LIVING's time tracking system also permanently destroy an employee's biometric information from such third-party administrator's system upon the employee's separation of employment from SMITH SENIOR LIVING.
5. In the event SMITH SENIOR LIVING begins collecting biometric data for any additional purpose, SMITH SENIOR LIVING will update this procedure.