



BIOMETRIC INFORMATION PRIVACY

Policy: IT-11001, v.1

Category: Information Technology Services

Effective: 12/01/2022

Origination Date: 12/01/2022

I. PURPOSE:

Mary Lanning Healthcare, its vendors, and/or the licensor of Mary Lanning Healthcare's time and attendance software collect, store, and use biometric data solely for employee identification, fraud prevention, and the pre-employment hiring purposes. Mary Lanning Healthcare recognizes the sensitivity of Biometric Information and takes seriously its obligations to maintain the confidentiality and protect the security of data. This policy sets forth Mary Lanning Healthcare's procedures for authorization, disclosure, storage, and destruction of this information.

II. POLICY:

It is the policy of Mary Lanning Healthcare to obtain consent prior to collecting or utilizing biometric information.

III. DEFINITIONS:

A. **Biometric data** includes "biometric identifiers" and "biometric information" as defined under certain laws.

1. "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.
2. "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.

IV. RESPONSIBILITIES:

As a part of the hiring process, Mary Lanning Healthcare will provide the policy for review prior to obtaining a consent by the employee to collect any biometric information.

V. PROCEDURE:

A. Authorization and Disclosure

1. Mary Lanning Healthcare will not disclose or disseminate any biometric data to anyone other than its vendors and the licensor of Mary Lanning Healthcare's time and attendance software providing products and services using biometric data without/unless:
 - a) First obtaining written employee consent to such disclosure or dissemination;

- b) The disclosed data completes a financial transaction requested or authorized by the employee;
 - c) Disclosure is required by state or federal law or municipal ordinance; or
 - d) Disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.
2. Mary Lanning Healthcare, its vendors, and/or the licensor of Mary Lanning Healthcare's time and attendance software will not sell, lease, trade, or otherwise profit from employees' biometric data; provided, however, that Mary Lanning Healthcare's vendors and the licensor of Mary Lanning Healthcare's time and attendance software may be paid for products or services used by Mary Lanning Healthcare that utilize such biometric data.

B. Retention Schedule

1. Mary Lanning Healthcare shall retain employee biometric data only until, and shall request that its vendors and the licensor of Mary Lanning Healthcare's time and attendance software permanently destroy such data when, the first of the following occurs:
 - a) The initial purpose for collecting or obtaining such biometric data has been satisfied, such as the termination of the employee's employment with Mary Lanning Healthcare, or the employee moves to a role within Mary Lanning Healthcare for which the biometric data is not used; or
 - b) Within three years of the employee's last interaction with Mary Lanning Healthcare.

C. Data Storage

1. Mary Lanning Healthcare shall use a reasonable standard of care to store, transmit, and protect from disclosure any paper or electronic biometric data collected. Such 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 Mary Lanning Healthcare stores, transmits, and protects from disclosure other confidential and sensitive information, and as required by law, 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.

D. To the extent that Mary Lanning Healthcare, its vendors, and/or the licensor of Mary Lanning Healthcare's time and attendance software collect, capture, or otherwise obtain biometric data relating to an employee, Mary Lanning Healthcare will first:

1. Inform the employee in writing that Mary Lanning Healthcare, its vendors, and/or the licensor of Mary Lanning Healthcare's time and attendance software are collecting, capturing, or otherwise obtaining the employee's biometric data, and that Mary Lanning Healthcare is providing such biometric data to its vendors and the licensor of Mary Lanning Healthcare's time and attendance software;
2. Inform the employee, electronically or in writing, of the specific purpose and length of time for which the employee's biometric data is being collected, stored, and used; and
3. Receive a written release signed by the employee (or his or her legally authorized representative) authorizing Mary Lanning Healthcare, its vendors, and/or the licensor of Mary Lanning Healthcare's time and attendance software to collect, store, and use the employee's biometric data for the specific purposes disclosed by Mary Lanning



Healthcare, and for Mary Lanning Healthcare to provide such biometric data to its vendors and the licensor of Mary Lanning Healthcare's time and attendance software.

VI. REFERENCES

None

VII. COLLABORATED WITH:

Scott Moore, Attorney at Law, Baird Holm, LLP

VIII. DISTRIBUTION:

All employees

IX. RESCISSIONS

A. Origination Date: 12/2022

B. Reviews/Revisions:

X. REVIEW AND REISSUE DATE:

A. Three (3) years from Effective Date

B. 12/2025

XI. FOLLOW-UP RESPONSIBILITY:

A. Compliance and Privacy Officer,

B. Director Information Technology Services

XII. ATTACHMENTS:

A. Consent and Release to Collect Biometric Information