

STUDENT BIOMETRIC INFORMATION PRIVACY POLICY

Paul Mitchell The School Federal Way records attendance in clock hours. To ensure proper clock hours are credited, students are required to clock in and out utilizing a biometric scanner in accordance with the Citrix policy. Biometric scanners are computer-based systems that scan a student's finger or facial identifier for purposes of identification. The computer system extracts unique data points and creates a unique mathematical representation used to verify a person's identity. Paul Mitchell The School Federal Way or its vendors may collect, retain, and use biometric data for the purpose of identifying students when recording clock hours.

Biometric Data Defined

In general, biometric data is "biometric identifiers" and "biometric information" as defined below.

"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 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.

Purpose for Collection of Biometric Data

The School does not collect or store biometric data. At this time, the School's third-party time clock vendor may collect and store an individual's biometric identifier (for example, fingerprint or facial identifiers), solely for identification in connection with the use of the biometric time clock. The School's third-party time clock vendor will retain biometric data of an only for so long as the person is an enrolled student. The biometric data shall be permanently removed from the records of the School's vendors and licensors in accordance with the retention schedule set forth herein.

Disclosure and Authorization

Each student will be required to sign the Release and Consent to Use of Biometric Data as a condition of his/her enrollment with the School.

The School and its time clock vendors will not sell, lease, trade, or otherwise profit from students' biometric data; provided, however, that the School's time clock vendor will be paid for products or services used by the School that utilize such biometric data.

The School will not disclose or disseminate any biometric data to anyone other than its time clock vendors without first obtaining student's written consent to such disclosure or dissemination unless disclosure or redisclosure is required by state or federal law or municipal ordinance or required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

Retention Schedule

The School shall retain a student's biometric data only until, and shall require that its time clock vendors permanently destroy such data when, the first of the following occurs:

- ❶ Within thirty (30) days after the initial purpose for collecting or obtaining such biometric data has been satisfied, such as the withdrawal or graduation of a student;
or
- ❷ Within 3 years of the student's last interaction with the School.

Data Storage

The School and its time clock vendors 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 way the School or its time clock vendors transmit and protect from disclosure other confidential and sensitive information, including personal information that can be used to uniquely identify an individual or an individual's account or property, such as driver's license numbers and social security numbers.

Release and Consent by Student to Use of Biometric Data

The undersigned student acknowledges that he/she has received and been given the opportunity to review the School's Biometric Information Privacy Policy (located in the student catalog), and that he/she voluntarily consents to the School's (including its time clock vendors) collection, storage, and use of biometric data, including to the extent that it utilizes the student's biometric identifiers or biometric information as defined in BIPA and/or in the School's Biometric Information Privacy Policy, and voluntarily consents to the School providing such biometric data to its time clock vendors. The undersigned further acknowledges that the School has advised him/her that providing his/her consent to the School's or its vendors' use of the student's biometric data to record attendance in clock hours using a biometric scanner is completely voluntary, that the undersigned may choose to decline to give consent to the School's or its vendors' use of such biometric data, and if the undersigned so elects, that the undersigned may continue using the paper sign-in sheet.

☐ **I Consent**

☐ **I Decline**

Future Professional Signature _____ Date _____

Guardian Signature (*if applicant is a minor*) _____ Date _____

Future Professional Name (print) _____