Biometric Data Privacy Policy

Alliant Credit Union ("Alliant") provides employees with the option to use their face or fingerprint to access Alliant-supplied computers and all data related thereto is stored on the employee's Alliant-supplied computer. Alliant established this Policy to ensure such data is reasonably safeguarded and not retained for longer than is necessary. Because Biometric Data may be created during the computer access process, this policy is intended to comply with all potentially applicable laws, including, but not limited to, the Illinois Biometric Information Privacy Act.

Definition of Biometric Data

Under this Policy, Biometric Data is the data generated from the scan of an employee's face or fingerprint on the Alliant-supplied computer and any information that is derived therefrom, including sign-on information. The phrase "Biometric Data" is used in this policy to include, but is not limited to, all potentially applicable legal definitions of "biometric identifiers" or "biometric information," which can include, but are not limited to, data generated from the scan of an employee's face or fingerprint. For purposes of this policy, information derived from a scan of an employee's face or fingerprint during the sign-on process is referred to as "Biometric Data" even though it may not meet the definition of "biometric information" or "biometric identifiers" under applicable law.

Collection of Biometric Data

The Alliant-supplied computer works by digitally converting representations of geometric measurements of an employee's face or fingerprint generated by the Alliant-supplied computer into a template. The template is securely stored on the Alliant-supplied computer. No face, fingerprint or image of a face or fingerprint is ever captured by the Alliant-supplied computer, only a template generated from the digital conversion of representations of a face or fingerprint, which is used for purposes of sign-on verification.

Alliant will obtain a written release/consent, as applicable, from employees in the form approved by Alliant. The form will inform the employee about the data being collected; the purpose of the collection; and the period of time the Biometric Data is being collected, stored, and used.

Use of and Access to Biometric Data

Alliant will not use the Biometric Data other than to permit the employee the option of using the Biometric Data to sign on to the Alliant-supplied computer. The Alliant-supplied computer, per Microsoft, each sensor on the Alliant-supplied computer will have its own biometric database file where template data is stored. Each database has a unique, randomly generated key that is encrypted to the system. The template data for the sensor will be encrypted with this per-database key using AES with CBC chaining mode, and the hash is SHA256 and therefore, Alliant will not be able to "see" (i.e. access) the templates.

Disclosure of Biometric Data

As described above and disclosed in the referenced written release/consent, by opting into face and/or fingerprint sign-on, the employee is storing their Biometric Data locally on the Alliant-supplied computer. In the event the Biometric Data should become accessible in the future through a change in Microsoft's systems, Alliant will only provide such access in accordance with applicable law and other best practices.

Retention and Destruction of Biometric Data

Biometric Data will not be retained anywhere else other than on the Alliant-supplied computer. Upon an employee's discontinued use of the Alliant-supplied computer for any reason, Alliant will "reset" the Alliant-supplied computer and that will have the effect of permanently deleting the Biometric Data. The Biometric Data will only be retained until the Alliant-supplied computer is reset after the employees discontinued use, which re-setting should not be longer than six months after the employee's discontinued use.

Safeguarding Biometric Data

The Biometric Data is safeguarded solely Microsoft's systems as installed on the Alliant-supplied computer.

Amendment, Enforcement and Violations

Alliant reserves the right to amend this Policy at any time for any reason.

Employees who violate this Policy shall be subject to discipline up to and including termination of employment.