

The Chicago Yacht Club's Biometric Information Privacy Policy

In accordance with the Illinois Biometric Privacy Act, 740 ILCS 14/1, *et seq.*, and other applicable laws and regulations, the Chicago Yacht Club (the "Club") has adopted these policies and procedures for the collection, capture, use, disclosure, transmission, storage, and destruction of Biometric Information. This Biometric Information Privacy Policy is also available to the public at www.chicagoyachtclub.org/careers.

The Club reserves the right to amend this policy at any time.

Biometric Data Defined

As used in this policy, the following terms have the following meaning:

"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 Identifiers do not include information captured from a patient in a healthcare setting or information collected, used, or stored for healthcare treatment, payment, or operations under the federal Health Insurance Portability and Accountability Act of 1996.

"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.

"Confidential and Sensitive Information" means personal information that can be used to uniquely identify an individual or an individual's account or property. Examples of Confidential and Sensitive Information include but are not limited to, a genetic marker, genetic testing information, a unique identifier number to locate an account or property, an account number, a PIN number, a passcode, a driver's license number, or a social security number.

"Biometric Data" means "Biometric Identifiers", "Biometric Information" and "Confidential and Sensitive Information" as defined above and in the Illinois Biometric Information Privacy Act, 740 ILCS § 14/1, *et seq.*

"Biometric Data Vendors" mean the Club's vendors that collect, capture, possess, store, use, transmit, retain, and destroy Biometric Data, and any licensors of time and attendance applications, programs, and devices used by the Club or its vendors, including any software and hardware that collect, capture, store, use, transmit, or destroy Biometric Data.

Purpose for Collection of Biometric Data

The Club, as well as its Biometric Data Vendors, collect, capture, store, and use Biometric Data for employee identification purposes and for the recording of time entries when utilizing biometric timeclocks or timeclock attachments in connection with wage and salary administration, employee identification, and fraud prevention. The Club will not sell, lease, trade, or otherwise profit from employees' Biometric Data; provided, however that the Biometric Data Vendors may be paid for products or services used by the Club that utilize such Biometric Data.

The Club may share, disclose, redisclose, or otherwise disseminate employees' Biometric Data to the Biometric Data Vendors to accomplish the purposes of this Policy.

Data Storage

The Club will not disclose or disseminate any Biometric Data to anyone other than its Biometric Data Vendors unless:

1. The Club first obtains written consent from the employee (or his or her legally authorized representative) authorizing such disclosure or dissemination;
2. The disclosed Biometric Data serves to complete a financial transaction requested or authorized by the subject of the Biometric Data;
3. Disclosure is required by State or federal law or municipal ordinance; or
4. Disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

Retention Schedule and Guidelines

If the Club possesses Biometric Data, the Club shall permanently destroy an individual's Biometric Data promptly when the initial purpose for collecting or obtaining such Biometric Data has been satisfied, such as:

1. The employee's employment is terminated;
2. The employee moves to a role within the Club for which the Biometric Data is not used (e.g., the employee is no longer an hourly employee who "clocks in" on a timeclock);
3. The Club no longer uses the Biometric Data; or,
4. Within 3 years of the employee's last interaction with the Club.

In no situation will Biometric Data be retained for more than three years after an employee's last interaction with the Club, unless otherwise required by law. If any of the Club's Biometric Data Vendors require access to Biometric Data in order to fulfill the purpose of collecting such information, the Club will request that they follow the above destruction schedule.

Data Storage

The Club recognizes the sensitivity of Biometric Data and takes seriously the obligations to maintain the confidentiality and protect the security of Biometric Data. If the Club possesses Biometric Data, the Biometric Data will be stored, transmitted, and protected using a reasonable standard of care for the Club's industry, in a manner that is the same as or that exceeds the standards of care used to protect other confidential information held by the Club. This includes, among other things, restricting access to Biometric Data to authorized Club employees or Biometric Data Vendors who have a business need to access the information, and using reasonable technological means to prevent unauthorized access to the information. 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 the Club stores, transmits and protects 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 genetic markers, genetic testing information, account numbers, PINs, driver's license numbers and social security numbers.

Contacts and Notice

Any questions and notices concerning this Policy must be sent to:
brennan@chicagoyachtclub.org

**Chicago Yacht Club Biometric Data Privacy Policy Acknowledgment,
Release, and Consent**

The employee named below has been advised and understands that Chicago Yacht Club (“the Club”) and its Biometric Data Vendors (as defined in the Club’s Biometric Information Privacy Policy) may collect, capture, retain, possess, transmit, store, and use Biometric Data, such as thumbprints, for employee identification purposes and for the recording of time entries when utilizing biometric timeclocks or timeclock attachments in connection with wage and salary administration, employee identification, and fraud prevention.

The Illinois Biometric Information Privacy Act, 740 ILCS 14/1, *et seq.* (“BIPA”), regulates the collection, capture, storage, use, disclosure, and retention of “Biometric Identifiers” and “Biometric Information.” “Biometric identifier” means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. “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.

The undersigned employee acknowledges that he/she has received the Club’s Biometric Information Privacy Policy, which is also available to the public www.chicagoyachtclub.org/careers, and that the employee consents to the Club and its Biometric Data Vendors’ collection, capture, storage, transmission, retention, possession, and use of Biometric Data through biometric timeclocks, including to the extent that it utilizes the employee’s Biometric Identifiers or Biometric Information as defined in BIPA, and consents to the Club providing such Biometric Data to its Biometric Data Vendors.

Employee Name (Print) _____

Employee Name (Signature) _____

Date _____