

Student Biometric Information Privacy Policy

Last updated: June 7th, 2023

Pivot Point Academy at 144 E Lake St Ste C, Bloomingdale, Illinois 60180 - Wahl Barber Academy at 8501 West Higgins Road, Suite 110, Chicago, Illinois 60631 (referred to as either "The Academy", "We", "Us" or "Our" in this policy) refers to DFR, LLC with the address of at 747 E. Boughton Rd, Suite 286, Bolingbrook, Illinois 60440.

Definitions

Biometric scanners are computer-based systems (like a smart time clock) that scan a student's finger or facial identifier for the purpose of identification. The computer system extracts unique data points and creates a unique mathematical representation used to verify a person's identity instead of using punch cards or fobs.

We or our third-party vendors may collect, retain, and use biometric data for the purpose of identifying students when recording clock hours. Biometric data as used in this policy is "biometric identifiers" and "biometric information" as defined in the Illinois Biometric Information Privacy Act, 740 ILCS § 14/1, et seq. "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 the Use of Biometric Data

The Academy 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. The goal is to ensure compliance with state/federal regulations, prevent fraudulent practices, and improve overall efficiency, comfort, and accuracy in tracking attendance for our students and our administration.

At this time, we may collect and store an individual's biometric identifier (for example, fingerprint or facial identifiers) at our smart time clock, solely for identification in connection with the use of the biometric time clock. The reference to a person is created by a seat id and no other personal information is stored at the smart time clock. Information from the time clock will only contain the seat id as an identifier and no biometric identifier is included in any transfer. The Academy's third-party time clock will retain biometric data of an only for so long as the person is an enrolled and active student. The biometric data shall be permanently removed from the smart time clock in accordance with the retention schedule set forth herein. The Academy and its time clock vendors will not sell, lease, trade, or otherwise profit from students' biometric data; provided, however, that our time clock vendor will be paid for products or services used by us that utilize such biometric data. The Academy 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

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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 Academy 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:

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 within three (3) years of the student's last interaction with us.

Data Storage

The Academy 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 we or our 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.

Rights

Students have the right to access, correct, and delete (deactivated) their biometric data by sending a written detail request to Student Services requested access, correction, or deactivation.

The students understand that they are free to decline to provide biometric identifiers and biometric information to us or our third-party vendor(s) of our time and attendance software without any adverse attending action. The student may revoke this consent at any time by notifying our Student Service Department in writing. If no written objection is received by us, it is agreed that the employee/student has voluntarily consents to The Academy's usage and collection of biometric data as defined in this policy.

The Academy reserves the right to modify or amend the Student Biometric Information Privacy Policy at any time and for any reason. All changes will be effective immediately when posted on our website.

Liability

The Academy is not liable for any damage or losses that may arise from the use of the biometric punch time clock and the time attendance software.