



BIOMETRIC INFORMATION PRIVACY POLICY

Policy Statement

Northwestern University (“Northwestern” or “the University”) uses biometric identification systems to increase security and control access to certain campus facilities. The University recognizes the sensitivity of Biometric Information and takes seriously its obligations to maintain the confidentiality and protect the security of data.

Purpose

In accordance with the Illinois Biometric Privacy Act, 740 ILCS 14/1 et seq., and other laws and regulations, the policy sets forth the University’s procedures for disclosure, storage and destruction of Biometric Information.

Audience

Faculty, staff, students, and third-party contractors.

Definitions

Biometric Identifier. A fingerprint, voiceprint, retina or iris scan, hand or face geometry scan.

Biometric Information or Biometric Data. Information based on a person’s biometric identifier that is used to identify that person.

Policy Implementation

I. Consent

An individual’s Biometric Data will not be collected or otherwise obtained by Northwestern University without prior written consent of the individual. The consent form will inform the individual of the reason the Biometric Information is being collected and the length of time the data will be stored.

II. Disclosure

The University will not disclose or disseminate any Biometric Data to anyone other than its Biometric Identifier collector vendor(s) and/or licensor(s), unless:

- a. Disclosure is required by state or federal law or municipal ordinance; or other identifier;
- b. Disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction,

- c. The disclosed data completes a financial transaction requested or authorized by the employee;
or
- d. The employee has consented to such disclosure or dissemination.

III. Storage

In circumstances where Northwestern retains Biometric Information, the University will use a reasonable standard of care to store, transmit and protect from disclosure any paper or electronic Biometric Data collected. 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 University stores, transmits and protects from disclosure other confidential and sensitive information that is used to uniquely identify an individual.

IV. Retention Schedule

In circumstances where Northwestern retains Biometric Information, the University will permanently destroy an individual's Biometric Data within six (6) months of when the initial purpose for collecting or obtaining such Biometric Data has been satisfied, such as:

- a. The employee's employment is terminated;
- b. The student graduates or otherwise leaves the University;
- c. The employee transfers to a position for which the Biometric Data is not used; or
- d. The University no longer uses the Biometric Information.

If any University's vendors and/or licensors require access to Biometric Data in order to fulfill the purpose of collecting such information, the University will request that they follow the above destruction schedule.

Related Information

[Biometric Identifier Collection Authorization Form](#)

Contacts

The following office can address questions regarding this Policy:

Risk, Internal Audit, and Compliance

Phone: (847) 467-6170; email: university.compliance@northwestern.edu

History

This policy was enacted June 6, 2019.

Policy URL:

<http://policies.northwestern.edu/docs/biometric-information-privacy-policy-final.pdf>