

Great Lakes Credit Union's Biometric Information Privacy Policy

Effective Date: 03/15/24

Overview

Great Lakes Credit Union ("GLCU") respects the privacy of its members and applicants for membership to GLCU. This policy outlines how GLCU, and/or its vendors, processes biometric data collected from you for identity verification, fraud prevention purposes, membership application and account maintenance¹.

Biometric Data Defined

As used in this policy, biometric data includes "biometric identifiers" and "biometric information" as defined under 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. As the term is used in this policy, the selfie photograph you upload to the software for use in the biometric algorithm is considered a "biometric identifier." "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.

Disclosure and Authorization Policy

Your Biometric Data will not be shared, sold or otherwise disclosed to third parties other than the third-party vendors involved in providing services to GLCU for the purposes described above. GLCU and/or its vendors will take reasonable measures to store, transmit, and protect your Biometric Data from unauthorized access, disclosure, or use. To the extent that GLCU, and/or its vendors, collect, capture, or otherwise obtain biometric data relating to a consumer, GLCU must first:

Inform each consumer that GLCU, and/or its vendors, are collecting, capturing, or otherwise obtaining the consumer's biometric data, and that the GLCU is providing such biometric data to its vendors;

Inform the consumer of the specific purpose and length of time for which the consumer's biometric data is being collected, stored, and used; and

Receive consent by the consumer authorizing GLCU and/or its vendors, to collect, store, and use the consumer's biometric data for the specific purposes disclosed by GLCU, and for GLCU to provide such biometric data to its vendors.

GLCU, and/or its vendors, will not sell, lease, trade biometric data;

This policy is intended to comply with all federal, state, and local laws. You have the right to revoke this authorization at any time and request the deletion of your Biometric Data upon written notice to GLCU. Revocation of consent may affect your ability to access certain GLCU services.

Purpose for the Collection of Biometric Data

GLCU, and/or its vendors, collect, store, and use biometric data solely for identity verification, fraud prevention purposes, membership application and account maintenance.

Security

GLCU shall use a commercially reasonable standard of care to store, transmit and protect from disclosure any 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 manner in which GLCU 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.

Retention

GLCU shall retain consumer biometric data only until,

The initial purpose for collecting or obtaining such biometric data has been satisfied, such as verification of consumer identity; or

Request of consumer to destroy the biometric data; or

Until 3 years of consumer's last interaction with us, whichever occurs first.

Contact Information

If you have any questions about our use, storage, or security of your biometric data you can contact us a privacy@glcu.org

¹ GLCU is exempt from the Illinois Biometric Information Privacy Act and is or may be exempt from certain laws and/or regulations governing biometric information in other states. By adopting this Policy GLCU does not waive any applicable exemptions from laws, regulations and/or rules governing Biometric Information.