

FROEDTERT SOUTH POLICY AND PROCEDURE

BIOMETRIC INFORMATION PRIVACY POLICY

PURPOSE

Froedtert South uses biometric identification systems to increase security and control access. Froedtert South recognizes the sensitivity of biometric information and takes seriously its obligations to maintain confidentiality and protect the security of biometric data.

Consistent with the Wisconsin and Illinois privacy laws, including the Illinois Biometric Information Privacy Act (BIPA), 740 ILCS 14/15(a), Froedtert South maintains this retention and destruction schedule and makes this policy publicly available.

SCOPE

This policy applies to biometric identifiers and biometric information of employees, contractors, students, and vendors collected for access control, authentication, or similar operational purposes. It does not apply to information captured from a patient in a healthcare setting or information collected, used, or stored for HIPAA treatment, payment, or healthcare operations, which are excluded from BIPA's definition of biometric identifier/information.

DEFINITIONS

Biometric Identifier - 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 (e.g., height, weight, hair color, eye color), nor information captured from a patient in a healthcare setting or collected, used, or stored for HIPAA treatment, payment, or operations.

Biometric Information / Biometric Data - Information based on a person's biometric identifier used to identify that person.

FROEDTERT SOUTH POLICY AND PROCEDURE

Written Release - Informed written consent, including electronic signature, acknowledging collection/storage, purpose(s), and length of term for collection, storage, and use.

Electronic Signature - An electronic sound, symbol, or process attached to or logically associated with a record and executed or adopted with the intent to sign the record. (Electronic signatures are valid for BIPA written releases per the 2024 amendment.)

POLICY

1. Consent

Froedtert South will not collect, capture, purchase, receive through trade, or otherwise obtain an individual's biometric identifier or biometric information without first providing written notice and obtaining a written release. The release will inform the individual that biometric information is being collected or stored, state the purpose(s), and state the length of term for collection, storage, and use.

Consent & Role Requirements For certain positions and duties (e.g., access to automated medication-dispensing cabinets or EPCS workflows), biometric authentication is an essential job requirement or a required control. Individuals may decline to provide, or revoke, a written release at any time by submitting a signed request to the Director of Information Services. If consent is declined or revoked and no feasible, approved alternative can meet patient-safety, security, or regulatory requirements, Froedtert South may:

- reassign the individual to a role that does not require biometric authentication, if available; or
- if reassignment is not available, determine that the individual cannot perform the essential functions of the role.

Employment actions will be made consistent with applicable law and System policy and will not be retaliatory; they reflect whether essential functions and required controls can be satisfied.

2. Retention Schedule and Destruction

Froedtert South permanently destroys biometric identifiers/information when the initial purpose for collecting or obtaining the data has been satisfied or within three (3) years of the individual's last interaction, whichever occurs first. Examples include:

- the access or security system is replaced or no longer used;
- the employee's employment is terminated;
- a student or vendor stops working with Froedtert South.

FROEDTERT SOUTH POLICY AND PROCEDURE

3. Disclosure

Froedtert South does **not disclose** biometric identifiers or biometric information to third parties **except**:

- (a) with the subject's written consent (the Biometric Information Written Release & Notice is not consent to disclose);
- (b) to complete a financial transaction requested or authorized by the subject;
- (c) when required by State, federal, or municipal law; or
- (d) pursuant to a valid warrant or subpoena.

4. Storage

Froedtert South protects biometric identifiers/information using a reasonable standard of care within our industry and stores, transmits, and protects such data from disclosure using safeguards at least as protective as those used for other confidential and sensitive information, including encryption in transit and at rest, access controls, least-privilege, and auditing.

5. No Sale / No Profit

Froedtert South does **not sell, lease, trade, or otherwise profit** from biometric identifiers or biometric information.

6. Vendors

Vendors and licensors that access or process biometric data on Froedtert South's behalf must contractually agree to:

- (a) comply with Wisconsin and Illinois privacy laws, including the Illinois Biometric Information Privacy Act;
- (b) follow the same retention/destruction schedule;
- (c) not sell, lease, trade, or profit from the data;
- (d) implement protections meeting the standard of care above; and
- (e) promptly notify Froedtert South of any legal demand (e.g., subpoena) for biometric data to allow assessment and response. (While BIPA binds any "private entity" in possession, contractual terms ensure alignment and enforceability.)

FROEDTERT SOUTH POLICY AND PROCEDURE

7. Public Availability

This policy and the biometric retention/destruction schedule are made available to the public at:

- Website: www.FroedtertSouth.com

8. Policy Management

This policy is reviewed at least annually by Director of Information Services and updated as needed. Revisions and approvals are recorded in the Policy Information section. Public posting is updated upon approval.

POLICY INFORMATION

Title: Biometrics Information Privacy Policy

Department: Information Services

Policy Number:

Origination Date: December 2025

Revision: 1

Revision Date: December 2025

Original signed copy is on file in the Master Froedtert South Policy/Procedure Manual.