

Biometric Data Retention & Destruction Policy

[Agency Name] • [Street Address, City, State] • Effective date: [Date] • Policy owner: [Name / Role]

1. Purpose and scope

This policy governs all biometric identifiers and biometric information collected by [Agency Name] (“the Agency”) through its Signature Arrival system — the enrolled-only facial-recognition features used for staff door access and VIP client arrival recognition. It applies to the Agency, its staff, and its service provider, Agent Choice Internet (FollowThrough Works LLC), which installs and maintains the system.

2. Definitions

- Biometric identifier: a scan or mathematical representation of facial geometry used to identify a specific person.
- Biometric information: any information based on a biometric identifier used to identify a person.
- Not biometric data: license plate numbers, names, photographs not converted to templates, and ordinary video footage in which no one is identified.

3. What is collected, and the only purposes

The system stores facial-geometry templates only for individuals who have enrolled in writing: staff members (via the Staff Biometric Consent & Enrollment Form) and VIP clients (via the VIP List Opt-In Form). The only permitted purposes are: (1) unlocking office doors for authorized, enrolled staff; (2) generating arrival notifications for enrolled individuals. No other use is permitted.

4. What the Agency will never do

- Scan, match, or identify visitors or members of the public who have not enrolled.
- Sell, lease, trade, or otherwise profit from biometric data, or disclose it to any third party except as required by law.
- Store biometric data on, or connect the system to, State Farm systems, or associate it with policyholder data in any way.
- Collect any biometric identifier before a written consent is on file.

5. Storage and security

All biometric data is stored on access-controlled equipment located physically inside the Agency's office, on a segregated network, protected using the reasonable standard of care for the Agency's industry and in a manner at least as protective as the Agency uses for its own confidential information. Cloud storage of biometric identifiers is not used. The service provider's maintenance access does not involve transferring biometric data off-site.

6. Retention schedule

Data	Destruction trigger	Deadline	Method
Staff facial-geometry template + enrollment photos	Separation from the agency, or written withdrawal of consent — whichever first	Within 30 days of trigger; never later than 3 years after last system interaction	Permanent deletion; logged
VIP client facial-geometry	Opt-out, or removal from	Within 14 days of trigger;	Permanent deletion;

Data	Destruction trigger	Deadline	Method
template + enrollment photo	the VIP list by the agency	never later than 3 years after last system interaction	logged
VIP license-plate entries (not biometric data)	Opt-out, or removal from the VIP list	Within 14 days of trigger	Deletion from recognition list
Routine video footage (no recognition data)	Rolling retention window	Automatically overwritten after [30/60/90] days	Automatic overwrite

7. Destruction procedure

Destruction means permanent, irreversible deletion of the template and any enrollment photographs from the recognition system, including any local backups. Each destruction is recorded in the Enrollment & Destruction Log (Appendix A) with the date, the person who performed it, and the date confirmation was provided to the individual.

8. Individual rights

Any enrolled individual may withdraw consent at any time, in writing, to the office manager. Withdrawal triggers the schedule in Section 6. Individuals may request confirmation of destruction and a copy of this policy at any time.

9. State availability

Face-based recognition features are enabled only where permitted by applicable state and local law, and only with the written consents described in this policy. Where face-based features are not enabled, license-plate-based recognition (which does not involve biometric data) provides the arrival-notification function.

10. Policy review

This policy is reviewed at least annually by the policy owner, and whenever applicable law or the system's capabilities materially change. The current version is available from the office manager and posted or published where required by law.

Adopted by (print, sign): _____

Date: _____

Appendix A — Enrollment & Destruction Log

Individual	Type (staff / VIP)	Enrolled (date, by)	Consent on file	Destroyed (date, by)	Confirmation sent