



Retention and Destruction of Biometric Information

As an Illinois fingerprint vendor, Bushue Human Resources, Inc. d.b.a. Bushue Background Screening (BBS) is committed to protecting the privacy and security of the biometric information that we collect and process. To ensure that we comply with all applicable laws and regulations, BBS will safely harbor all work orders as they relate to biometric information, including applicant fee submissions, for a minimum of two years from the date of printing per the Joint Committee on Administrative Rules (JCAR) Title 68: Chapter VII: Part 1240: Section 1240.535 (c) (5). Once this period has expired, BBS will permanently destroy all work orders relating to biometric services, apart from a valid warrant or subpoena issued by a court of competent jurisdiction stating the continued harboring of information is allowable.

Unless required by customer contract or the FBI Criminal Justice Information Services (CJIS) Security Policy, BBS will retain all biometric information, including fingerprint images, for a period of up to 180 days from the date of receipt, fingerprint capture or card scan date, or the "date last modified" if the original fingerprint or card scan date was modified. In case of errors that require re-transmission of fingerprint images, the "date last modified" will be updated, starting a new 180-day retention period.

BBS considers 180 days as an appropriate retention period as it allows for the resubmission of fingerprints for customers and applicants who do not receive or accidentally misplace reports. If a new set of fingerprint images is required, it creates a new fingerprint inquiry transaction with a new date of fingerprint capture, starting a new 180-day retention period.

If obligated by customer contracts or the FBI CJIS Security Policy require retention of fingerprint images for a specific period of time other than 180 days, BBS may not destruct biometric information within its standard operating procedures, or 180 days.

In cases where work orders, identifiers, and other biometric information is pertaining to direct employees of BBS, BBS may maintain this data for the duration of employment.

Identifiers and other biometric information received in paper form, such as fingerprint cards, are converted into electronic/digital format by BBS. The physical documents are then kept in a file for a period of up to 180 days. At the end of the 180-day period, the physical documents are securely disposed of by being placed in a shred bin. A third-party service provider hired by BBS securely shreds the contents of the shred bins, ensuring that any sensitive information is destroyed in a secure manner.

Once a hard drive is deemed to be decommissioned it will be erased utilizing a Department of Defense level hardware erasure process.

Electronic copies of biometric information will be securely deleted from our system within a reasonable time frame, in accordance with our retention policy and any applicable legal or contractual obligations.



This Privacy Policy may be modified or amended at any time without prior notice. Please review this Privacy Policy prior to contacting BBS with requests or questions.

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