



# BIOMETRICS RETENTION AND DESTRUCTION POLICY

2025

CENTRAL ILLINOIS  
NOTARY & IMAGING

3131 Robbins Rd  
Springfield, IL 62704

IDFPR Live Scan  
Fingerprint Provider  
Agency License #249.00158

## Section 1. Introduction

Central Illinois Notary & Imaging (“CINI”) is an Illinois headquartered licensed fingerprint vendor. Section 1240.535(c)(8) of the Illinois Administrative Code regulating fingerprint vendors provides: “A licensed fingerprint vendor must develop a written policy, made available to the public, establishing a retention schedule and guidelines for permanently destroying identifiers and other biometric information when the initial purpose for collecting or obtaining the identifiers or information has been satisfied or after 3 years from the individual's last interaction with the licensed fingerprint vendor, whichever occurs first. Absent a valid warrant or subpoena issued by a court of competent jurisdiction, a private entity in possession of biometric identifiers or biometric information must comply with its established retention schedule and destruction guidelines” (the “Regulation”). This Policy is drafted pursuant to the Regulation and in order to inform fingerprint applicants about how CINI handles, stores and processes certain applicant information. This Policy will be periodically updated.

**Section 2. Retention Policy**  
**2.1 Retention**  
Unless obligated by customer contract or the FBI CJIS Security Policy to maintain fingerprint images for a specific period of time, all identifiers and other biometric information, including fingerprint images may be retained for up to 60 days from the date of receipt, fingerprint capture or card scan date, or the “date last modified”, in the case where the original fingerprint or card scan date was modified. Exhibit A (available upon request) is part of this policy and contains an updated list of customer contract categories or names listing retention policies that differ from the above 60 days. Exhibit A will be updated from time to time.

If a fatal or non-fatal error occurs requiring the retransmission of fingerprint images, the “date last modified” will be updated, beginning a new 60-day retention period. The above time period is a proper retention period as it allows for the resubmission of fingerprints for customers and applicants who either do not receive reports or in instances where the initial fingerprint submission is not properly processed by the state or federal agency. This prevents inconveniencing the fingerprint applicant as they do not need to be re-printed in those instances. If an event outside of CINI’s control occurs, such as war, terrorism, pandemic, an act of God, etc. (a “Force Majeure”) the time frames in this Policy may be extended to take into account the Force Majeure.

When an error results in the need for a new set of fingerprint images to be taken, this creates a new fingerprint inquiry transaction with a new date of fingerprint capture, starting the 60-day retention date from the revised date of fingerprint capture. When obligated by customer contract or the FBI CJIS Security Policy to retain fingerprint images for a specific period of time other than 60 days, CINI has electronically programmed its retention database to retain the digital images to the specific requesting agency requirements. Electronic retention has been built utilizing the purpose for which the fingerprints were captured, in addition to the requesting agency Originating Agency Identifier assigned by the Illinois State Police, Bureau of Identification or the Federal Bureau of Investigation.

CINI recognizes there may appear to be a conflict between the Regulation and the requirements with respect to certain contracts with respect to the retention time frame, but believes the intent of the

Regulation is not to conflict with governmental contractual requirements and can be reconciled by the fact that the initial purpose of the contractual requirement has not been met and the governmental entity is relying upon the fingerprinting agency for archival of its records. Additionally, the Act specifically provides that it does not apply to contractors of State or local governments and this further supports that the Regulations are not intended to restrict a government contractor from retaining records longer than 3 years. Therefore, a period of retention of greater than 3 years is warranted in certain circumstances. CINI receives biometrics as a government contractor and applicants should be aware that the retention time frames vary for different agencies.

If CINI is sold or merged the successor will have control over and access to all identifiers and other biometric information; however, the transaction document will require the successor to comply with the terms of the then current version of this Policy.

2.2 Retention of Employee Records The identifiers and other biometric information of CINI's employees will be maintained by CINI in accordance with the time frames in this Policy.

### Section 3. Permanent Destruction Policy

Section 3.1 Electronic Documents All identifiers and other biometric information which are stored electronically are encrypted both in transit and at rest from the time of capture and while stored on a local server or backup hard drive. If they are backed up offsite, they are securely encrypted in the cloud so the cloud server provides no third-party access to them. Before the deadlines in this Policy are met, secure electronic "delete" functions take place after which the identifiers and other biometric information

are no longer accessible and permanently destroyed on the applicable hard drive, backup drive, or external cloud servers so the identifiers and other biometric information are no longer accessible after the time frames noted in this Policy.

Section 7. Questions and Copies This Policy is available to the public at <https://mycini.com/compliance> and is also provided upon request. Questions related to the Policy should be directed to:

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