Sample Retention Policy and End-User Consent Language

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CCS provides this sample for informational purposes only. It is not legal advice or a statement that adopting this sample establishes compliance. Before use, the Photographer must customize it for the actual workflow, identify the current Face Matching provider, confirm processing and deletion practices, and obtain advice from its own legal counsel.

Sample biometric retention policy

Photographer / Studio: _____
Privacy contact: _____
Privacy policy URL: _____
Face Matching technology provider: _____

1. Purpose and access

The Photographer uses the optional Face Matching Tool to organize Event photographs and help End Users find photos that appear to show the same person. Event photographs are sent through Candid Color Systems, Inc. (CCS), doing business as QuicPics, to a secure third-party Face Matching provider. The provider creates and processes face-geometry scans or templates (biometric data) to return photo-matching relationships.

QuicPics and CCS cannot directly access, view, or retrieve the provider's biometric face-geometry scans or templates and never receive or store them. QuicPics receives only photo-matching relationships and does not provide the scans or templates to the Photographer. The Photographer may receive photographs, contact details, check-in selfies, and photo-matching results, which are separate from the provider-held scans and templates.

2. Scope

This policy applies to the Photographer's use of Face Matching for the Event or collection identified in the consent below, including End Users whose photos may be processed. Face Matching must not begin for an individual until all notices, permissions, and consents required by applicable law have been obtained, including any required written release or parent or guardian authorization.

3. Provider retention and destruction

The secure provider permanently deletes the biometric face-geometry scans and templates after approximately 90 days, or sooner when no longer needed for the Face Matching purpose or required by applicable law. Limited retention supports new photographs, rerun matching, corrected results, and ongoing Event matching. Completion of one matching pass does not mean that all provider-held biometric data is immediately deleted.

Sample biometric retention policy

3. Provider retention and destruction (continued)

The provider must retain biometric data only as long as necessary for the stated Face Matching purpose. Earlier deletion applies when that purpose, including ongoing Event matching, is complete and the data is no longer necessary; Face Matching is disabled for the applicable collection or account; the associated content or account is deleted; or a verified request or applicable law requires deletion. CCS coordinates provider deletion where applicable without receiving the biometric scans or templates.

Where the Illinois Biometric Information Privacy Act (BIPA) applies, biometric data must be permanently destroyed when the initial purpose has been satisfied or within three years of the individual's last interaction with the private entity, whichever occurs first. Any shorter applicable deadline controls. This legal outer limit does not extend the provider's approximately 90-day retention period.

Photographs, contact information, check-in selfies, orders, and photo-matching relationships follow the Photographer's separate published retention policies and the applicable Event and account settings. Deleting a biometric template does not itself delete those separate records. The Photographer remains responsible for data it collects, controls, or stores and for coordinating lawful deletion requests with CCS.

4. Notice and written consent

Before Face Matching processing begins, the Photographer provides the required notice describing the purpose, processing, provider involvement, and retention period and obtains any legally required consent or written release. Where required, a parent, guardian, or other legally authorized representative must consent for the individual. A sample written release appears on the next page.

Accepting retail Terms of Use, acknowledging a Privacy Policy, purchasing photographs, or consenting to email or text messages does not replace any separate biometric consent required before processing begins. A later checkout agreement does not authorize biometric processing that already occurred. The Photographer must keep records of the applicable notice and consent and apply the same requirements to uploaded photographs or contact data.

5. Use, disclosure, and security

Biometric data is used solely for the stated Face Matching purpose. It will not be sold, leased, traded, used for advertising or unrelated profiling, or otherwise used for an independent purpose. Provider-held biometric data may be disclosed only as necessary for the contracted Face Matching service, with legally sufficient authorization, or as otherwise permitted or required by applicable law.

The Photographer protects information it handles using reasonable safeguards and complies with applicable privacy, security, notice, consent, and retention requirements. CCS requires the Face Matching provider to safeguard provider-held biometric data and restrict its use to the contracted service.

6. Questions and withdrawal

End Users or their legally authorized representatives may contact the Photographer using the privacy contact above with questions or to withdraw consent. The Photographer will stop or arrange to stop further Face Matching processing and coordinate applicable provider deletion, consistent with law and the technical operation of the service. Withdrawal does not change the lawfulness of processing completed under valid prior consent. Any available alternative for obtaining photographs should be explained before consent is requested.

Exhibit A - Written Release

Complete this form and obtain any legally required signature before Face Matching processing begins. The Photographer must customize and review this sample with legal counsel.

Photographer / Studio: _____
Event or collection: _____
Individual whose photographs will be processed: _____
Face Matching technology provider: _____

Purpose and handling

I authorize the Photographer to submit photographs of the individual identified above through QuicPics / CCS to the identified secure third-party provider so that the provider can create and analyze face-geometry scans or templates to identify other photographs that appear to show the same person. The purpose is to organize Event photographs and help locate and deliver those photographs.

I understand that QuicPics and CCS cannot directly access, view, or retrieve the provider's biometric face-geometry scans or templates and never receive or store them. QuicPics and the Photographer receive photo-matching relationships, not those scans or templates. Photographs, contact information, check-in selfies, and matching relationships may remain stored under the separate policies described in the notice.

Length of retention

The provider permanently deletes the biometric scans and templates after approximately 90 days, or sooner when no longer necessary for the stated Face Matching purpose or required by applicable law. During that limited period, the provider may support additional photographs, corrected results, and ongoing matching for this Event or collection. Any earlier legal destruction deadline controls.

Consent and withdrawal

I have received and read the Photographer's Data Retention Policy and this notice. I voluntarily consent to the biometric processing described above for the identified individual and Event or collection, including the necessary transfer of photographs to the provider and return of photo-matching results through CCS. This release applies from the date signed and does not purport to authorize processing that occurred before required consent was obtained.

I may withdraw this consent by contacting the Photographer at the privacy contact listed in the policy. The Photographer will coordinate stopping further processing and any applicable provider deletion. This Face Matching consent does not itself authorize marketing messages or unrelated use of the information.

I am signing as (select one):
[ ] The individual whose photographs will be processed.
[ ] A parent, guardian, or other legally authorized representative.
If signing for another individual, relationship / authority: _____

Signature: _____ Date: _____

Printed name: _____

A legally valid electronic signature or consent process may be used where permitted by applicable law. The Photographer must retain the completed consent and the version of the notice provided.