

Stakeholder Issue No. 16
Draft as of 12/11/14

Risk/Issue: Withdrawal of Facial Template from a database

IBIA - The Entity using Facial Recognition should develop and publish a privacy policy that provides a point of contact and instructions for an easy-to-use, free procedure for consumers to follow to request removal of their facial template. The Entity should acknowledge receipt of and promptly comply with any such request. Once the template has been removed, the consumer should be notified that the removal has been completed.

CFA - The Entity using Facial Recognition should develop and publish a privacy policy that provides a point of contact and instructions for an easy-to-use, free procedure for consumers to follow to request removal of their facial template. The Entity should acknowledge receipt of and promptly comply with any such request. Once the template has been removed, the consumer should be notified that the removal has been completed and the Entity should not create another template using the consumer's image without the consumer's express affirmative consent.

IAB - The Entity using Facial Recognition should develop and publish a privacy policy that ~~provides a point of contact and instructions for~~ describes an easy-to-use, free procedure for consumers to follow to request removal of their facial template if the Entity provides such a procedure. ~~The Entity should acknowledge receipt of and promptly comply with any such request. Once the template has been removed, the consumer should be notified that the removal has been completed.~~

Additional Comment: There was discussion about whether there needs to be a general statement that the code does not apply to security and loss prevention uses.