

## Irvine Company Biometric Privacy Policy

Effective Date: May 10, 2021

Last Updated: May 24, 2021

This Biometric Privacy Policy describes how The Irvine Company LLC and its subsidiaries and affiliates (collectively, "Irvine", "we", "us", or "our") collect, use, store, and share your biometric data when you access and use our identification verification process ("Process").

### Jumio

Please note, our Process is powered by Jumio, a service provider to Irvine. In addition to this Biometric Privacy Policy and your agreement to Irvine's [Biometric Terms](#), [Jumio's Privacy Policy for Online Services](#) may apply to additional types of information collected by Jumio during the Process such as GPS coordinates or IP Address, and controlled by Jumio. To learn more about Jumio's privacy practices, please see [Jumio's Privacy Policy for Online Services](#).

### Changes

We reserve the right to modify this Biometric Privacy Policy from time to time, which may be posted to this page. If required by law, we also may provide notification via another method reasonably likely to reach you, such as via e-mail (if you have an account where we have your contact information). Any modifications to this Biometric Privacy Policy will be effective upon our posting of the modifications and/or upon implementation of new changes to the Process.

In all cases, your continued use of the Process after the posting of any modifications indicates you have read and understood our then-current Biometric Privacy Policy.

### Acknowledgment

Please read this Biometric Privacy Policy carefully. The practices described herein are subject to the laws in the places in which we operate.

**BY ACCESSING AND/OR USING OUR PROCESS, YOU REPRESENT YOU HAVE READ AND UNDERSTOOD THIS BIOMETRIC PRIVACY POLICY.**

### What Is Biometric Data?

Biometric data includes biometric identifiers and biometric information. Biometric identifiers include things like a scan of your face or facial geometry. Biometric identifiers do not include signatures, photographs, or related information.

Biometric information is any information that is based on a biometric identifier used to identify an individual. For example, our Process collects a picture of your ID and a scan of your face. We then match that scan to your identification presented to verify your identity. The scan of your face would constitute a biometric identifier. The information on your ID we use to compare to the scan of your face would constitute biometric information.

### Why Do We Collect Your Biometric Data?

We collect your biometric data when you use the Process to verify your identity, prevent fraud, and to ensure the safety of those who work and live at our properties.

## What Do You Do With My Biometric Data After You Collect It?

We will only use your biometric data for the purpose of providing the Process, verifying your identity, and allowing you to tour our properties. We will not use your biometric data for any other purpose. Specifically, we will not sell, lease, trade, or otherwise profit from your biometric data. We will also not disclose or disseminate your biometric data to anyone other than our service provider, Jumio.

Please note, Jumio, our service provider, may share your biometric data to facilitate the Process, including comparing your biometric information against anti-fraud databases. For more information about Jumio's practices, please see [Jumio's Privacy Policy for Online Services](#).

## How Long Do You Keep My Biometric Data?

We and our service provider, Jumio, will delete your biometric identifier (i.e., your facial scan) within twenty four (24) hours after your use of the Process and completion of verification. After completion of verification, we will only hold certain non-biometric information collected through the Process, such as an image of your ID, for up to thirty (30) calendar days, after which such information will be deleted. In any event your biometric information will be deleted and permanently destroyed the earlier of (i) when the initial purpose for collecting the information has been satisfied or (ii) within three (3) years after your last interaction with Irvine regarding this Process.

## How Will You Secure My Biometric Data?

Although no system can guarantee the complete security of your biometric data, we take all commercially reasonable steps to ensure your biometric data is protected in alignment with all applicable laws and regulations, as appropriate to the sensitivity of your biometric data.

## What Are My Rights?

Depending on where you live, you may have the ability to ask us to take certain action with regard to your biometric data. To learn more about your options, please visit Irvine's [Privacy Policy](#).

## How Does Irvine Treat The Biometric Data Of Minors?

The Process is directed to persons 18 years of age or older. We do not collect or use the biometric data of persons under the age of 18.

## How Can I Contact Irvine If I Have Questions?

Please direct any questions or comments about this Biometric Privacy Policy to [privacy@irvinecompany.com](mailto:privacy@irvinecompany.com). You may also write to us via post mail at:

Irvine Company  
Attn: Information  
550 Newport Center Drive, P.O. Box 6370  
Newport Beach, CA 92658-6370