

Biometric Data Consent & Retention Policy

Effective Date: March 1, 2026

EduGlean LLC (“EduGlean,” “we,” “our,” or “us”) may collect or process biometric data for identity verification, fraud prevention, platform security, and tutor verification purposes.

What Is Biometric Data?

Biometric data may include:

- Facial scans
- Facial geometry
- Identity verification images
- Video-based identity verification
- Other legally recognized biometric identifiers

Purpose of Collection

EduGlean may use biometric data solely for:

- Verifying tutor identity
- Preventing fraud or impersonation
- Enhancing platform trust and safety
- Meeting legal or compliance obligations

We do not sell biometric data.

Consent

By voluntarily submitting biometric information through the EduGlean platform, you expressly consent to:

- Collection
- Processing
- Storage
- Use of biometric data for the purposes described in this Policy.

You may decline biometric verification; however, some platform features or tutor eligibility requirements may become unavailable.

Disclosure to Third Parties

Biometric data may be processed by authorized third-party identity verification providers acting on EduGlean’s behalf.

We require service providers to:

- Maintain reasonable security measures
- Use biometric data only for authorized purposes
- Comply with applicable privacy and data protection laws

Retention and Deletion

EduGlean retains biometric data only for as long as reasonably necessary to:

- Complete verification processes
- Prevent fraud
- Comply with legal obligations
- Resolve disputes or enforce agreements

Unless required by law:

- Biometric data will be permanently deleted when the purpose for collection has been satisfied, or
- Within three (3) years after the user's last interaction with EduGlean, whichever occurs first.

Security Measures

EduGlean implements reasonable administrative, technical, and physical safeguards designed to protect biometric information from unauthorized access, disclosure, or misuse.

Your Rights

Subject to applicable law, users may request:

- Information regarding biometric data processing
- Access to biometric records
- Deletion of biometric data
- Withdrawal of consent

Requests may be submitted to:

support@eduglean.com

State-Specific Rights

Residents of certain jurisdictions, including Illinois, Texas, and the European Union, may have additional rights regarding biometric data under applicable law.

Changes to This Policy

EduGlean may update this Policy periodically. Updated versions will be posted on the platform with a revised effective date.