



1 PURPOSE

This Biometrics and Recording Retention Policy ("Policy") outlines CrayLink LLC's practices regarding biometric data, session recordings, and related data retention in compliance with the Illinois Biometric Information Privacy Act (BIPA), 740 ILCS 14/1 et seq., and other applicable federal and state laws. This Policy should be read together with the CrayLink LLC Privacy Policy and Terms of Service.

2 SCOPE

This Policy applies to all employees, contractors, agents, and third-party partners that collect, store, process, or transmit recordings or biometric data on behalf of CrayLink LLC (D.B.A. CrayNotary).

3 BIOMETRIC DATA HANDLING

CrayLink LLC does not directly collect, store, or process biometric identifiers or biometric information (including fingerprints, facial geometry, voiceprints, iris scans, or similar identifiers). However, we engage third-party service providers that may collect and process biometric data as part of the identity verification and notarization process.

Third-Party Partners Handling Biometric Data:

- **Persona Identities, Inc.** – Handles facial recognition and government-issued ID verification as part of the identity verification process.
<https://withpersona.com/legal/privacy-policy>
- **Pactima Inc.** – Handles identity verification data for notarizations performed through its platform.
<https://pactima.com/privacy>
- **BlueNotary LLC** – Handles audio and video recordings and identity verification for remote online notarization sessions.
<https://bluenotary.us/privacy-policy/>

CrayLink LLC requires all partners to comply with applicable privacy laws and to implement appropriate safeguards for the protection of biometric data.

4 AI PROCESSING OF SESSION DATA

CrayLink LLC uses AI tools provided by our AI service partners in connection with internal operations. The following describes how AI systems interact with session-related data:

- **What Our AI Partners Process:** AI systems may process scheduling information, general client communications, operational correspondence, and pre-signature document content submitted by CrayLink LLC staff. Our AI service partners are treated as data processors on behalf of CrayLink LLC for these limited purposes.
- **What Our AI Partners Do Not Process:** Our AI partners' systems do not receive raw notarization recordings, government-issued identification documents, biometric data, payment card numbers, or executed and signed notarized documents.



- **AI Partner Data Practices:** Data submitted to our AI partners is subject to their respective usage policies and privacy practices. Our AI service partners are disclosed in the CrayLink LLC Privacy Policy, which governs the full scope of data sharing with those providers.

5 RECORDING RETENTION POLICY

CrayLink LLC is legally required to retain audio, video, and document recordings related to our services. Retention periods are as follows:

- **Minimum retention:** Seven (7) years from the date of the notarization session, as required by applicable state law.
- **Extended retention:** Up to ten (10) years for compliance, legal, or business purposes.

After the applicable retention period, records may be securely deleted or destroyed using industry-standard data destruction methods. Recordings are stored in access-controlled systems. Access is restricted to authorized personnel with a legitimate legal, compliance, or customer service need. All access to recordings is logged and subject to periodic audit.

6 CONSUMER RIGHTS AND INQUIRIES

6.1 Illinois Residents - Rights Under BIPA

Illinois residents have rights under the Illinois Biometric Information Privacy Act (BIPA), 740 ILCS 14/1 et seq., including the right to request information about what biometric data has been collected on their behalf by third-party partners, request deletion of biometric data held by third-party partners where technically and legally feasible, and be informed of the specific purpose and duration for which biometric data is being collected. Because CrayLink LLC does not directly collect biometric data, BIPA inquiries must be directed to the applicable third-party provider: Persona (withpersona.com), Pactima (pactima.com), or BlueNotary (bluenotary.us).

6.2 California Residents - Rights Under CCPA/CPRA

California residents have the right under the CCPA and CPRA to know what personal data has been collected and how it is used, to request deletion, to correct inaccurate personal data, and to opt out of the sale or sharing of personal information. CrayLink LLC does not sell personal information. Contact howdy@CrayNotary.com. Response within 45 days as required by law.

6.3 Virginia Residents - Rights Under VCDPA

Virginia residents have rights under the Virginia Consumer Data Protection Act (VCDPA), including the right to access, correct, delete, and obtain a copy of their personal data, and to opt out of profiling used for decisions with legal or similarly significant effects. Contact howdy@CrayNotary.com. Response within 45 days, with possible 45-day extension.

6.4 Colorado Residents - Rights Under CPA

Colorado residents have rights under the Colorado Privacy Act (CPA), including the right to access, correct, delete, and obtain a portable copy of their personal data, and to opt out of targeted advertising and profiling. Contact howdy@CrayNotary.com. Response within 45 days.



6.5 Texas Residents - Rights Under TDPSA

Texas residents have rights under the Texas Data Privacy and Security Act (TDPSA), including the right to access, correct, delete, and obtain a copy of their personal data, and to opt out of the sale of personal data and targeted advertising. CrayLink LLC does not sell personal information. Contact howdy@CrayNotary.com. Response within 45 days.

6.6 All Residents - Appeals

If CrayLink LLC declines to act on a rights request, you may appeal that decision by submitting a written appeal to howdy@CrayNotary.com within 30 days of receiving our response. We will respond to your appeal within 60 days and provide a written explanation of our decision.

6.7 Rights Regarding Recordings

For inquiries regarding CrayLink LLC's recording retention practices, contact the Privacy Officer at 730 West Lake Street, Suite 189, Chicago, Illinois 60661 or howdy@CrayNotary.com.

6.8 Rights Regarding AI-Processed Data

For inquiries about how AI systems have processed your data, contact the Privacy Officer at the address above. We will work with our applicable AI service partners to address your inquiry to the extent permitted by their policies.

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POLICY UPDATES

CrayLink LLC reserves the right to amend this Policy at any time to reflect changes in applicable law, technology, or business practices. Material changes will be communicated to clients in writing. Continued use of our services following any update constitutes acceptance of the revised Policy.

Last Updated: April 17, 2026

CrayLink LLC is an Arizona limited liability company with its principal place of business in Chicago, Illinois. These policies are governed by the laws of the State of Illinois, with exclusive venue in the state or federal courts of Cook County, Chicago, Illinois.

For questions about any of these policies, contact CrayLink LLC at howdy@CrayNotary.com.