

February 23, 2016

To: Members of the General Law Committee

Fr: Connecticut Bankers Association

Contacts: Tom Mongellow, Fritz Conway

Re: H.B. No. 5326 (RAISED) AN ACT PROHIBITING THE CAPTURE AND USE OF FACIAL RECOGNITION TECHNOLOGY FOR COMMERCIAL PURPOSES

Position: Oppose

This bill would require businesses to disclose and request consent of customers that their facial images will be taken and possibly stored, using any type of facial recognition software. After a customer consents, the bill would allow a business to store and share the facial image with others (including law enforcement), if that sharing process relates to the transaction.

While we understand the desire for disclosure and privacy in this area, we oppose this proposal as it would be unworkable in the normal course of banking business for many reasons.

Fighting Identify Theft and Fraud would become more difficult. FRS is a promising technology that has the unique ability to quickly identify and deter criminals trying to access a victim's cash or accounts.

Existing Technology does not have an "on/off" recording switch at the teller station. It is not possible to stop and start the recording function for each teller station while waiting for the disclosure and assent process to be completed.

If cameras were known to be turned off during this disclosure process, this would only encourage more bank robberies. Bank recording technology is primarily employed to deter and prevent criminal activities - particularly robberies. That technology has the potential to immediately identify a criminal and share that image with law enforcement - regardless of that "customer" assenting to their picture being taken. That can't happen if the recording technology is turned off - pending a disclosure.

The proposed disclosure and assent would be a time consuming and confusing from a customer perspective. Many customers and non-customers will walk into a bank to cash a check, buy a money order or conduct a number of other banking transactions in a quick and orderly fashion. They already expect to be photographed on the banks video monitoring equipment - they do not expect to receive and have to sign yet another "bank" disclosure just to conduct their transaction.

We urge the Committee to remove banks from requirements of the bill.