



FCRA and Access Security Requirements / CIC Policies

IMPORTANT: PLEASE READ CAREFULLY!

Credit and public record information is very confidential and its use is regulated by the federal Fair Credit Reporting Act (Title VI, Public Law 95-108), among other federal and state laws. CIC also sets forth strict policies and guidelines, which you must comply with when using this information. With that in mind, here are some key provisions CIC Subscribers must abide by when utilizing credit and public record information.

1. You must always get a subject's written authorization before accessing their credit and/or public record profile. If you access a subject's credit and/or public record information under false pretenses, and/or without their authorization the penalty for such action(s) under the Federal Fair Credit Reporting Act is imprisonment for up to one year and up to a \$2,500 fine, and/or any civil damages the court may award the party which brought the action.

EXCEPTION: The Federal Fair Credit Reporting Act states in effect that a creditor or their authorized agent attempting to collect a valid and legally enforceable debt (with or without a judgment) from a subject, can obtain a credit profile on that subject without their authorization.

2. Always retain each subject's Authorization for File Disclosure, or rental/credit/employment application for no less than 6 years (both approved and denied applicants).

3. You must hold a subject's credit information in strict confidence. In context with the Fair Credit Reporting Act, an excerpt from CIC's agreement states "...All information provided by CIC to Subscriber shall be retained by Subscriber in strict confidence and disclosed only to employees and agents whose duties reasonably relate to the legitimate business purposes for which the information is requested. Subscriber agrees that Subscriber shall not sell or otherwise distribute to third parties any information received hereunder, except as provided by this agreement or required by law". Of course, the party extending credit to a subject (i.e. in the form of a real estate loan, a rental transaction, when financing a product or service, etc.), basing their decision in whole or in part on a subject's credit and/or public record history does have a right to review the subject's credit and/or public record profile.

4. If you (or your client) deny a subject for a credit related transaction (in the form of a real estate loan, rental of a dwelling, the financing of a product or service, etc.) you are to provide them with such a notice in writing. This notice must reference the appropriate reporting agency, and state that the subject can request a copy of their credit profile from the credit reporting agency in question free of charge. They must request their credit profile within 60 days from the date they were denied credit (otherwise, they must pay the credit bureau's prevailing rate for a copy of their report). In addition, the notice must state that the subject has the right to dispute the accuracy or completeness of any information contained in their consumer credit and/or public record report.

5. You must protect your account number and password so that only key personnel employed by your company know this sensitive information. If you suspect your CIC account number and password are being used without authorization, you are to immediately contact CIC at 1-800-288-4757.

6. CIC cannot serve any companies or individuals engaged in any of the following businesses: adult entertainment, businesses in an unrestricted residential location, attorneys or law offices, bail bondsman, check cashing, credit counseling or repair, dating service, financial counseling, genealogical research and people locator service, massage service, pawn shop, private detectives, 3rd party repossession, companies involved in spiritual counseling, future services (ex. health club, timeshare), tattoo service, news agencies, insurance claims, those who intend to re-sell its credit and/or public record reports directly, or indirectly, or those who plan to use (or which do use) such information in any unlawful manner as set forth in the Fair Credit Reporting Act, as well as any other applicable federal, state, and/or local laws(s). Furthermore, CIC cannot serve any individuals or companies which plan to use (or which do use) its reports for any purpose(s) prohibited by its policies and/or agreement. If you misuse said information in the manner(s) described above, your account with CIC will be terminated without notice.



- 7. Your employees may not access their own report or the report of a family member or friend if your company does not have permissible purpose. Should you wish to obtain a copy of your own credit or public record report, you are to contact the applicable credit reporting agency or www.annualcreditreport.com 877-322-8228 for a free credit report.**

- 8. All Subscribers are subject to audit of files and other information in conjunction with credit and public record information from CIC, 3rd parties authorized by CIC, Experian, Equifax, as well as Federal and State regulatory agencies. Subscribers may be requested to provide original applications and information regarding procedures and other documents relating to their application process, use and storage of information gained from CIC or CIC's information delivery systems. Failure to comply may result in immediate suspension and, where applicable, civil and/or criminal liability.**

- 9. System access software, whether developed by your company or purchased from a third party vendor, must have your account number and password "hidden" or embedded and be known only by supervisory personnel. Assign each user of your system access software a unique logon password. If such system access software is replaced by different access software and therefore no longer in use or, alternatively, the hardware upon which such system access software resides is no longer being used or is being disposed of, your password should be changed immediately.**

- 10. Do not discuss your account number and password by telephone with any unknown caller, even if the caller claims to be an employee of your credit provider.**

- 11. Place all terminal devices used to obtain credit information in a secure location within your facility. You should secure these devices so that unauthorized persons cannot easily access them.**

- 12. After normal business hours be sure to turn off and lock all devices or systems used to obtain credit information.**

- 13. Secure hard copies and electronic files of consumers reports within your facility so that unauthorized persons cannot easily access them.**

- 14. Shred or completely destroy all hard copy consumer reports when no longer needed.**

- 15. Erase and overwrite or scramble electronic files containing consumer information when no longer needed and when applicable regulation (s) permit destruction.**

When conducting an investigation, particularly following a consumer complaint that your company impermissibly accessed their credit report, CIC will contact you and will request a copy of the original application signed by the consumer or, if applicable, a copy of the sales contract.

QUESTIONS? *Should you have any questions regarding the information contained in this bulletin, please feel free to contact your CIC representative at: 1-800-288-4757.*