



First American CREDCO

# Safeguard YOUR DATA and your reputation

At First American CREDCO, data security and compliance is consistently one of our highest priorities. It's why 9 out of the nation's 10 top lenders choose – and trust – First American CREDCO when it comes to safeguarding the integrity of consumer data.

## WHY SHOULD YOU TRUST FIRST AMERICAN CREDCO WITH YOUR DATA?

### The Risk is Real

It only takes one headline to ruin your reputation, and potentially cost you millions. Identity theft and security breaches hurt everyone: your business, our company and, more importantly, your customers. Focusing on the compliance process and protecting consumer data isn't just good business, it's our obligation to you and the consumers you serve.

### Compliance

Federal law and credit bureau requirements mandate that we know our customers, their permissible purposes for use of credit data, and how their businesses work. We judiciously abide by state, local and federal laws to ensure compliance with FCRA, FACTA, OFAC, CIP, GLB, and other regulations. Since many of our customers conduct business in more than one state, our Agreement for Service is broad enough to ensure compliance for all 50 states. And because laws vary from state to state, it's important to ensure that our compliance documents follow all applicable laws. Regulatory Compliance protects you and, ultimately, your customers.

### Reliability

For over 40 years, First American CREDCO has been the industry leader. Today, we process one out of every two mortgage credit reports. We didn't get here by cutting corners. We hold ourselves to a higher standard in everything we do, including data security and compliance. This dedication has made us the industry's benchmark against which all other credit reporting providers are measured.

*Designed for your benefit, many of the documents in our Compliance Package are informational pieces designed to help you understand how to comply with certain state and federal laws, as well as credit bureau requirements. Please take the time to read and understand them.*



## \$15 Million Settlement:

*The ChoicePoint Verdict*

**Private Data Compromised on more than 163,000 Consumers**

“The message to ChoicePoint and others should be clear: consumers' private data must be protected from thieves. Data security is critical to consumers, and protecting it is a priority for the FTC, as it should be to every business in America.” \*

- Deborah Platt Majoras  
Chairman, FTC

\*[www.consumeraffairs.com/news04/2006/01/choicepoint\\_fine.html](http://www.consumeraffairs.com/news04/2006/01/choicepoint_fine.html)



# 5 ways

FIRST AMERICAN CREDCO

## keeps your data safe

Our data security procedures help alleviate the risks of identity theft and security breaches, and help you understand your obligations under the Fair Credit Reporting Act (FCRA) and other applicable laws. When it comes to safeguarding sensitive consumer data, here are 5 reasons why you can trust First American CREDCO:



### FCRA EDUCATION DOCUMENT

Every First American CREDCO client receives a comprehensive, 4-page FCRA Educational Document. This document outlines the legal duties and responsibilities of credit report users, which includes permissible uses of credit reports; adverse action requirements; procedures for handling fraud alerts on credit reports; and the proper manner of disposing of credit reports when no longer needed.



### ACCESS SECURITY REQUIREMENTS

Because a majority of states have enacted security breach notification laws, each client is provided, and is required to comply with, First American CREDCO's Access Security Requirements. This document provides methods and procedures to protect credit reports and other sensitive information from unauthorized access, which ultimately helps reduce the risk of identity theft and security breaches.



### INTERNET ACCESS ORDERING DOCUMENT

First American CREDCO provides each of its clients with documentation outlining their obligations for accessing and ordering credit reports via the Internet. It also includes information regarding encryption requirements, dedicated firewalls and other data security advice.



### CUSTOMER IDENTIFICATION PROGRAM

When ordering Office of Foreign Asset Control (OFAC) products and services, our clients are required to maintain a Customer Identification Program (CIP). First American CREDCO's client agreement provides specific guidelines for consideration when implementing a CIP. These guidelines help ensure your compliance with the regulatory requirements mandated by the U.S. Department of Treasury's OFAC and other provisions of the U.S.A. Patriot Act.



### GRAMM-LEACH-BILEY (GLB) ACT

First American CREDCO's client agreement educates our clients on specific permitted and proscribed uses of fraud prevention products to help ensure your compliance with the Gramm-Leach-Bliley Act (the "GLB Act") or the FCRA.