

BSI dba BankVOD Audit Procedure for FCRA Data

AUDIT AND TRAINING REQUIREMENTS

BankVOD has a defined audit program in place that will monitor Customers' usage, will be designed to reasonably prevent unauthorized usage, and will detect unauthorized or inappropriate use of LexisNexis FCRA data. BankVOD will monitor Customers' use of the LexisNexis data and ensure Customers' compliance with the LexisNexis' standards, legal and regulatory obligations and contractual obligations made by Reseller to LexisNexis and by Reseller customers to the Reseller. Each Reseller's audit program must be designed to ensure compliance with, and meet the applicable requirements set forth in the GLBA, the FCRA, and the DPPA, as applicable. LexisNexis reserves the right to monitor and audit Reseller's Audit Program, as it deems appropriate, in its sole discretion, and LexisNexis requires all Reseller's to cooperate fully and provide prompt responses to such monitoring and auditing. Violations, as determined by LexisNexis in its sole discretion, may be grounds for immediate changes without notice to account status, including but not limited to, suspension, change in service level provided, and/or termination of account. Minimally, the Reseller's Audit Program must include the following factors:

GENERAL AUDIT REQUIREMENTS

We will maintain files on all Customers and their access to the LexisNexis data, and understands and agrees that LexisNexis may audit those files. The Reseller agrees to cooperate fully with any such audit.

- We have in place sufficient monitoring and logging capability to track individual transactions initiated by Reseller's Customers.

Specifically, LexisNexis requires that each Reseller be able to identify the following information for each search performed by its Customers:

- Customer - name of the Customer company that performed the search;
- User - the User ID used to access the system including the name of the individual who is authorized to use the User ID;
- Date/Time - Actual date and time of the search;
- IP address - the IP address from which the search originated; and
- Permissible Use - the business reason and corresponding legal permissible purpose under the applicable statute (for example, the GLBA) permitting the Customers to conduct the search.

We will monitor our Customers to ensure that Reseller is in compliance with its contract for LN Services, and that its Customers are in compliance with all laws and regulations. Resellers are required to take reasonable and appropriate steps to ensure that their Customers are abiding by all Terms and Conditions of their relationship with the Reseller. The Reseller's Audit Program must include random as well as regular monitoring of Customer activity to validate the permissible use of each search, and must include early detection of potentially fraudulent and/or suspicious activity. At a minimum, the our Audit Program includes:

New Customer Permissible Use Audits - When a new account is created, the new Customer will receive an audit from BankVOD within a timely manner that includes searches selected at random. Customer should respond within an acceptable, pre-determined timeframe, which should be no longer than 120 days from the time the audit letter is provided to Customer, and validate that the searches were performed for a permissible business reason, and in accordance with all laws, regulations and contractual obligations underlying access.

- Customer Random Audits – BankVOD will randomly select a reasonably representative percentage of its Customers for audit. The Customer searches should be selected at random and Customers should respond within an acceptable, pre-determined timeframe, which should be no longer than 120 days from the time the audit letter is provided to the Customer, and validate that the searches were performed a permissible business reason, and in accordance with all laws, regulations and contractual obligations underlying access.
- Event Driven Audits - Perform audits on accounts, or users, that have been referred by LexisNexis due to potentially unauthorized activity, or concern for which developed as a result of a report received from by a third party, such as another company or a consumer, may have conducted unauthorized searches. The Customer should respond within an acceptable, pre-determined timeframe, which should be no longer than 120 days from the time the audit letter is provided to the Customer, and validate that the searches were performed a permissible business reason, and in accordance with all laws, regulations and contractual obligations underlying access.

Resellers are required to cooperate with LexisNexis audit requests and will be responsible for assuring full cooperation by its employees and Customers in connection with such audits. Reseller will provide LexisNexis or obtain for LexisNexis access to such properties, records, and personnel as LexisNexis may reasonably require for such purpose. Violations discovered in any review by LexisNexis will be subject to immediate action including, but not limited to, termination of the Agreement, legal action and referral to federal or state regulatory agencies.

COMPLIANCE WITH TRAINING REQUIREMENTS

BankVOD represents and warrants that it shall comply with mandatory training at LexisNexis's request. Such training shall encompass Reseller responsibilities surrounding security, data compliance requirements and laws applicable to the LN Services. The training can be accessed via the LexisNexis Reseller Portal: <https://learn.lexisnexis.com/reseller>.