

Privacy Policy

Last Updated:

March 14, 2023

California Consumer Privacy Act (CCPA) Statement

Personal information that is collected, processed, sold, or disclosed pursuant to the Gramm-Leach Bliley Act (GLBA) is exempt from the California Consumer Privacy Act (CCPA). GLBA is a federal law that regulates the use and disclosure of personal information by financial institutions. Personal information obtained by AccountChek from financial institutions is regulated by GLBA. Consumers grant AccountChek authorization to collect their personal information from financial institutions and share it for specific purposes described in AccountChek's Terms of Service Agreement, which is presented to end users in the AccountChek® application.

AccountChek has implemented and maintains data security measures designed to ensure that personal information is secure and encrypted at rest or in transit.

AccountChek™ BY Informative Research

AUTOMATED ASSET VERIFICATION

AccountChek™ is an automated, web-based service that allows lenders to verify and monitor a potential borrower's asset accounts during the credit application and approval process. AccountChek eliminates a borrower's need to engage in the time-consuming process of locating, copying and transmitting important financial documents to their lender, often through insecure channels. Our service eliminates issues --like missing pages and lost or misplaced documents-- that slow down the review and approval process. Because we obtain the asset information directly from the borrower's financial institution or brokerage, our service also minimizes transcription errors and maximizes accuracy. This means that lenders are sure that they are basing their decisions on accurate information. Our service saves time for everyone involved in the transaction and reduces lender losses, which makes credit less expensive and more available to more customers.

AccountChek™ 3n1 BY Informative Research

Automated Asset, Employment, and Income Verification

AccountChek™ 3n1 is an automated, web-based service that allows lenders to verify and monitor a potential borrower's asset accounts and verify the borrower's employment status and income during the credit application and approval process. AccountChek 3n1 eliminates a borrower's need to engage in the time-consuming process of locating, copying, and transmitting important financial documents to their lender, often through insecure channels. Our service eliminates issues --like missing pages and lost or misplaced documents-- that slow down the review and approval process. Because we obtain the asset information directly from the borrower's financial institution or brokerage and employment and income information from the borrower's payroll provider, our service also minimizes transcription errors and maximizes accuracy. This means that lenders are sure that they are basing their decisions on accurate information. Our service saves time for everyone involved in the transaction and reduces lender losses, which makes credit less expensive and more available to more customers.

We understand the importance of protecting individuals' sensitive financial information. We designed this Privacy Statement to help you understand how the AccountChek and AccountChek 3n1 services will collect, use and disclose borrowers' financial data.

Special note on children's privacy: AccountChek and AccountChek 3n1 are not designed or intended to attract or be accessible to minors (children under age 18). We will not knowingly collect personal information from minors.

This policy covers the following topics:

- Information we collect about borrowers and how we use it;
- Who we share borrowers' information with; and
- How we protect borrowers' personal information.

Information Collection and Use

We collect personal and non-personal information from borrowers based on borrowers' consent. We are acting as an intermediary for the borrower's lender when we do so. We collect this information in order to provide the AccountChek and AccountChek 3n1 services and to improve our services.

Information We Collect from Borrowers

Information to Verify Asset Accounts: The AccountChek service allows lenders to verify a borrower's assets through direct read access to a borrower's financial account data. Borrowers must expressly agree to allow AccountChek to obtain and furnish financial account information to a prospective creditor, and to provide his/her identifying credentials for the accounts that need to be verified. The borrower's credentials may include username, password and answers to challenge questions. While the accounts are being verified and lenders are able to update that information (the refresh period; usually 30 to 90 days) the credentials are stored in a secure hardware-encrypted repository that is inaccessible to humans managed by AccountChek's designated data access vendor.

Information to Verify Employment and Income: The AccountChek 3n1 service allows lenders to verify a borrower's employment through direct read access to a borrower's payroll account data. Borrowers must expressly agree to allow AccountChek 3n1 to obtain and furnish payroll account information to a prospective creditor, and to provide his/her identifying credentials for the accounts that need to be verified. The borrower's credentials may include username, password and answers to challenge questions. While the accounts are being verified and lenders are able to update that information (the refresh period; usually 30 to 90 days) the credentials are stored in a secure hardware-encrypted repository that is inaccessible to humans managed by AccountChek 3n1's designated data access vendor.

Log information: Our servers automatically collect log information from site visitors. This information may include the Web page request, Internet Protocol (IP) address, browser type, browser language, the date and time of the request, and one or more cookies that may uniquely identify the visitor's browser. We collect log information so that we can properly administer our system and gather aggregate information about how our site is being used, including the pages visitors are viewing.

Cookies: We use session cookie technology to keep track of visitors as they navigate from one page to the next on the site. When the session is ended and the visitor closes his/her browser, the session cookies are automatically deleted.

Browser software can be set to reject all cookies or to accept cookies only from our site. Most browsers offer instructions on how to reset the browser to reject cookies in the "Help" section of the toolbar. Rejecting cookies will prevent further use of the AccountChek and AccountChek 3n1 services.

Information We Collect from Others

We collect information about borrowers from the lender who orders the account verification, from the financial institution(s) that provide the account verification data, and from the payroll provider's that provide the employment and income verification data.

The information provided by the lender includes the borrower's name, e-mail address, telephone number, the last four digits of his/her Social Security Number (for identity authentication), and the name of the borrower's employer(s).

The information we receive from the borrower's financial institution(s) includes the summary and transactional information from the accounts the borrower allows us to verify.

The information we receive from the borrower's payroll provider(s) includes the summary of employment information and income information from the accounts the borrower allows us to verify.

We will share this information in individually identifiable form only in accordance with this statement and our policies. We may share aggregated, non-personal information. This may include information we obtained from third parties in a form that does

not reasonably permit the borrower to be identified.

AccountChek works to deliver accurate, complete, and current borrower information by pulling information directly from the borrower's financial institution and payroll provider via online credentials. Data can be refreshed by the lender as needed to fulfill underwriting obligations for the duration of the order.

How We Use the Information We Collect

AccountChek and AccountChek 3n1 use the information we collect to provide verification and analysis of a borrower's asset accounts, employment information, and income data, respectively, to the requesting lender, to administer our web site, and to improve our service.

AccountChek and AccountChek 3n1 do not sell, share, license or transmit borrower information with or to third parties without the express authorization of the borrower.

Who Sees The Information We Collect

We will not disclose this information except as described in this policy.

Verification Service delivery: We will disclose the information we receive from the borrower's financial institutions and/or payroll provider to the requesting lender, as well as to any other parties that the borrower authorizes us to provide such information, to deliver the Verification of Deposit, Asset, Income, and/or Employment services.

Disclosure for legal reasons: We may release personal information to third parties: (1) to comply with valid legal requirements such as a law, regulation, search warrant, subpoena or court order; or (2) in special cases, such as a physical threat to the borrower or others, a threat to homeland security, a threat to our system or network, or cases in which we believe it is reasonably necessary to investigate or prevent harm, fraud, abuse, or illegal conduct. If we are legally compelled to disclose your personal information to a third party, we will make reasonable efforts to notify the borrower unless doing so would violate the law or court order.

Agents and contractors: Contractors who assist in operating our business and providing products or services sometimes have access to borrowers' personal information. These contractors include vendors and suppliers that provide us with technology, services, and/or content for the operation and maintenance of our site. Access to borrowers' personal information by these contractors is limited to the information reasonably necessary for the contractor to perform its limited function. Contractors have an obligation under their contracts with us to keep borrower information confidential and to comply with our privacy and security policies.

Some of these relationships may be with companies that co-brand portions of their site and services, or that provide services to borrowers on our behalf. Co-branded sites may have their own privacy policies posted on their sites. If you visit a co-branded site, please read the privacy policy that is posted on that site.

Direct Employees of Informative Research: Employees are NOT authorized to download information that is not directly related to their work. Prior to downloading any software tools, all employees are advised to notify an Operations staff member of this intention. If help is needed, the local system administrator will provide support. Employees are NOT authorized to download data from any production, stage, or QA system without prior written approval. Prior to downloading any data, all employees must follow the Data Privacy Download Procedures. This includes any and all data that is confidential, sensitive or legally protected, including log files.

AccountChek is owned by Informative Research (IR). Employees must follow the IR Privacy Policy and adhere to the IR Privacy Principles or be subject to disciplinary action per the IR Employee Handbook. Employees will be required to sign off yearly that they have read and understand this policy.

Changes in our corporate structure: If all or part of our company is sold, merged or otherwise transferred to another entity, the personal information you have provided to us may be transferred as part of that transaction. We will take steps to ensure that any personal information that is transferred will not be used or shared in a manner inconsistent with the Privacy Policy under which it was collected.

How We Safeguard Personal Information

IR has internal policies and procedures in place to safeguard consumer personal information. This includes administrative, technical, physical and human security control. IR as well as its third-party providers are E13PA, PCI, SOC2 or other similar industry standard compliant and must recertify annually to that standard.

We are committed to protecting the security of borrowers' private information through procedures and technology designed for this purpose. This includes, but is not limited to:

- Limiting access to personal information to only those employees who have a reasonable need to access this information in order to provide our products and services. Employees who misuse information are subject to disciplinary action, including termination;
- Utilizing physical, technical, and procedural safeguards to help protect borrowers' personal information; and
- Using secure transport layer security (TLS) to help protect this information while it is in transit between our servers and others' computers and hardware encryption devices. We use AES-256 encryption while it is being stored on our servers.

What Borrowers Can Do To Help Keep Personal Information Secure

Log out and close the browser: Closing the browser at the end of a session erases any information it may have temporarily stored on your computer.

Install antivirus software and spyware protection: Installing up-to-date antivirus software and running it often will help thwart viruses and other unwanted programs that can capture the contents of a borrower's system, including passwords.

Changes To This Policy

We may change our privacy policy in the future, but we will not change our practices until they have been posted at this website. If changes occur, we will also show the date of revision. By using our web sites, to which this privacy policy applies, you agree that we may notify you of changes in our privacy policy through this website.

Responsibility and accountability for developing, documenting, implementing, enforcing, monitoring, and updating the Privacy Policy falls to the Compliance Team whose contact information is available on the company intranet and web page.

Privacy Incident of Breach

In the event that IR suspects that borrower information has been compromised, IR will make every effort to contact and inform borrowers per its Incident Response Plan. This will include phone call or email.

Contact

The AccountChek suite of products are automated asset, employment, and/or income verification services provided by Informative Research. If you have questions or comments about this privacy policy, please e-mail us at ac-compliance@informativeresearch.com or write to Informative Research Inc., 13030 Euclid St, Ste 209, Garden Grove, CA 92843.

To request a copy of your consumer data supplied by Informative Research or an amendment to that information please email ac-compliance@informativeresearch.com, call [\(800\) 225-9498](tel:8002259498) or contact your lender directly.

Date of Review	Responsible Party	Summary of Review
03-13-23	Compliance Team	Annual Update, Syle Update
04-04-22	Mary Costello	Added explicit language to indicate that this policy doesn't supersede any other contractual privacy requirements
07-28-21	Zach Boronczyk	Style update
01-07-20	Compliance Team	Document Created