

BehaviorBank® PRIVACY POLICY

Balance

- We evaluate each product and service to assure balance between consumers' privacy expectations and the economic benefit to both consumers and clients
- We interact with consumer groups, regulators, industry associations and others to develop practices that build consumer trust in our sense of fairness

Accuracy

- We acquire information from reputable sources and take reasonable precautions to ensure and maintain the accuracy of that information
- We employ quality control procedures that help identify inaccurate or out-of-date information and minimize the addition of such information to our databases
- We periodically audit the information within our databases to maximize its accuracy and currentness
- Before we provide information to a client, we understand how that information is going to be used and we ensure that its use will be fair to consumers
- We frequently update the information in our databases to ensure it is as current as possible
- We periodically review our clients' marketing materials to make sure their criteria are consistent with and appropriate for the intended use
- We provide a process for consumers to dispute information within their credit report that they believe is inaccurate

Security

- We use a variety of security systems to safeguard the information we maintain and provide
- We maintain physical security for our facilities and limit access to critical areas
- We conduct approval processes before information we maintain can be accessed or changed

Integrity

- We comply with all laws and applicable self-regulatory guidelines
- All Ailment and Medical Data is obtained from HIPAA Compliant Sources
- We respond to marketplace signals that our use of information has gone beyond reasonable public expectations and make appropriate changes to meet marketplace needs while remaining within those expectations
- We acquire information with assurance that it has been obtained legally and can be provided to us for use and disclosure
- We comply with all contractual restrictions placed on information provided to us

- If we believe that a client is using our information in a manner that does not comply with applicable laws, industry codes or contracts, we will pursue corrective action, up to and including termination of the relationship
- We periodically review the use of our information by our clients to ensure appropriateness

Communication

- We are open and honest about the types of information we maintain, our information sources and how the information is used
- We maintain a dialogue with consumer advocates, clients, consumers, government officials and industry associations about privacy concerns
- We educate consumers, clients and employees about our business and our Information Values
- We actively encourage clients to comply with applicable self-regulatory practices