



## Privacy Enhancements Fact Sheet

### **I. Customer Access to Sensitive Personally Identifiable Information:**

- **Exited Select Consumer-Sensitive Data Markets.** ChoicePoint discontinued selling products that contain Sensitive Personally Identifiable Information (e.g., social security numbers and drivers' license numbers) in selected markets, at a cost of approximately \$15 - \$20 million in revenue.
- **Changed Process For Distributing Sensitive Personally Identifiable Information.** ChoicePoint no longer distributes information products that contain Sensitive Personally Identifiable Information except:
  - To support consumer initiated transactions such as insurance, employment and tenant screening, or financial
  - To provide authentication or fraud prevention tools to large accredited corporate customers where consumers have or want to establish relationships (e.g., fraud prevention tools for identity verification, customer enrollment and insurance claims)
  - To assist federal, state and local governments and criminal justice agencies

Even for these services the Sensitive Personally Identifiable Information and dates of birth may be masked from view. In other products, Sensitive Personally Identifiable Information is masked, truncated, or echoed back.

### **II. Credentialing:**

- **Established a Centralized Corporate Credentialing Center.**
- **Strengthened Credentialing Procedures Utilizing Multiple Internal and External Verification Sources and an Expanded Site Visit Program.**
- **Recredentialing Existing Customers.** As of January 26, 2006, ChoicePoint recredentialled over 80% of customers receiving Sensitive Personally Identifiable Information.

### **III. Policies, Procedures and Guidelines:**

- **Developed Information Security Breach Response and Consumer Notification Policy and Procedures.** ChoicePoint has developed a policy for response and notification to consumers in the event of a security breach.
  - Once relevant law enforcement agencies determine that notification of affected consumers will not impede a criminal investigation or threaten national security, ChoicePoint will notify the following parties in the most expedient time possible by appropriate means and in compliance with federal, state, and local laws and regulations:
    - The three major credit bureaus

- Affected consumers
- The Identity Theft Resource Center, a national nonprofit organization that assists victims of identity theft
- Affected customers and businesses whose information was or is reasonably believed to have been compromised
- Appropriate ChoicePoint information/data vendors whose information was or is reasonably believed to have been compromised
- Government representatives and relevant federal, state, and local regulatory agencies, as appropriate
- Policy sets forth assistance provided to consumers in the event of an information security breach
  - Toll-free number and website assistance to answer questions about incidents and assist affected consumers in taking the necessary steps to detect and protect against identity theft
  - Free credit report containing information from all three national credit reporting companies
  - One year of free credit monitoring which includes alerts of any key changes that may be a sign of identity theft
  - \$50,000 of identity theft insurance
  - Access to ChoicePoint fraud resolution representatives
  - Support from Identity Theft Resource Center
- **Codified, Enhanced and Developed Other Key Policies, Procedures and Guidelines.**
  - Data Destruction Policy and Procedures
  - Data Protection Guidelines
  - Data Encryption Guidelines
  - Customer User Access Policy
  - Non-U.S. Internet Application Access Policy & Procedures

#### **IV. Audit and Compliance:**

- **Successfully Completed 43 Third Party Audits in 2005.**
  - Audits included:
    - Several major insurance companies
    - Federal agencies
    - State agencies
    - Major financial institutions
    - 5 SAS 70 Type II Reviews. These reviews are technology process-oriented and focus primarily upon compliance with our internal controls over information security, computer operations, and application change control.
- **Enhanced ChoicePoint's Privacy Compliance Program.**
  - Engaged Ernst & Young LLP privacy team to assist in developing industry-leading compliance framework
  - Increased audit staff
  - Developed new insurance customer audit program

## **V. Organizational:**

- **Established Independent Office of Credentialing, Compliance and Privacy.** ChoicePoint established an independent Credentialing, Compliance and Privacy Office, headed by Carol DiBattiste, ChoicePoint's Chief Credentialing, Compliance and Privacy Officer. Ms. DiBattiste reports directly to the Privacy and Public Responsibility Committee of the Board of Directors of ChoicePoint Inc. Ms. DiBattiste was formerly the Deputy Administrator of the Transportation Security Administration, Under Secretary of the Air Force, and Director of the Executive Office for United States Attorneys, and partner in the law firm of Holland and Knight LLP.
- **Appointed Law Enforcement Liaison.** ChoicePoint appointed Robert McConnell, a 28-year veteran of the Secret Service and former chief of the federal government's Nigerian Organized Crime Task Force.
- **Created Privacy Positions Within the Business Units to Assist With Implementation of Privacy Policies, Compliance and Privacy Education.**

## **VI. Outreach and Education:**

- **Created a Dedicated Privacy Website** [www.privacyatchoicepoint.com](http://www.privacyatchoicepoint.com).
- **Developed a ChoicePoint Information and Privacy Enhancements Fact Sheet, posted on** [www.privacyatchoicepoint.com](http://www.privacyatchoicepoint.com).
- **Developed a Fraud Hotline: 866-473-3728.**
- **Developed enhanced privacy training which will be mandatory for all ChoicePoint associates.**
- **Conducted over 60 privacy outreach/education events.**

## **VII. Technology Solutions:**

- **Enhanced Network Security.**
  - Ensured systemic implementation of technical standards, patch management, and anti-virus standards across the enterprise, resulting in no serious virus infections in 2005
  - Continued vulnerability assessment program
- **Implemented Application Scanning Services.** ChoicePoint implemented external web server scans and application scanning services to reduce risk and satisfy customer requirements
- **Implemented Additional Encryption Technology.**
  - Implemented various technologies for secure messaging and encryption, to include enabling encryption technology for 20+ business processes, encryption of data feeds to credit bureaus, and database encryption for multiple business units to protect millions of rows of sensitive consumer data
  - Enabled our businesses to be compliant with Visa Payment Card Industry standard