



INTRODUCING

NCRA COMPLIANCE SERVICES NCRACS

Created to Assist Resellers with

**EXPERIAN TECHNOLOGY PROVIDER
COMPLIANCE & MANAGEMENT PROGRAM**



Today's Speakers

Terry Clemans — Moderator – NCRA Executive Director

Dan Hegarty — Experian Sales Operations Sr. Director

Carol Najera — Experian Third Party Compliance Manager

Ash Kotecha — Experian Sr. Manager Third Party Security North America

Marc Riccio — President, Specialized Data Systems

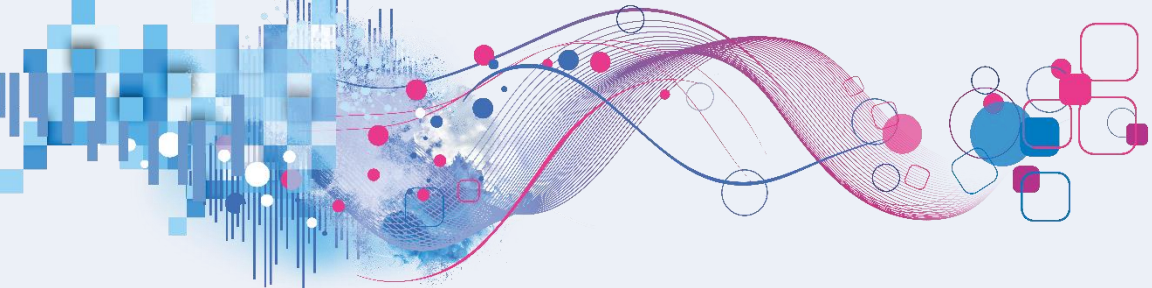
Heidi Smith — Project Manager and Business Analyst, Specialized Data Systems

Roy Goodwin — Compliance Director, NCRACS

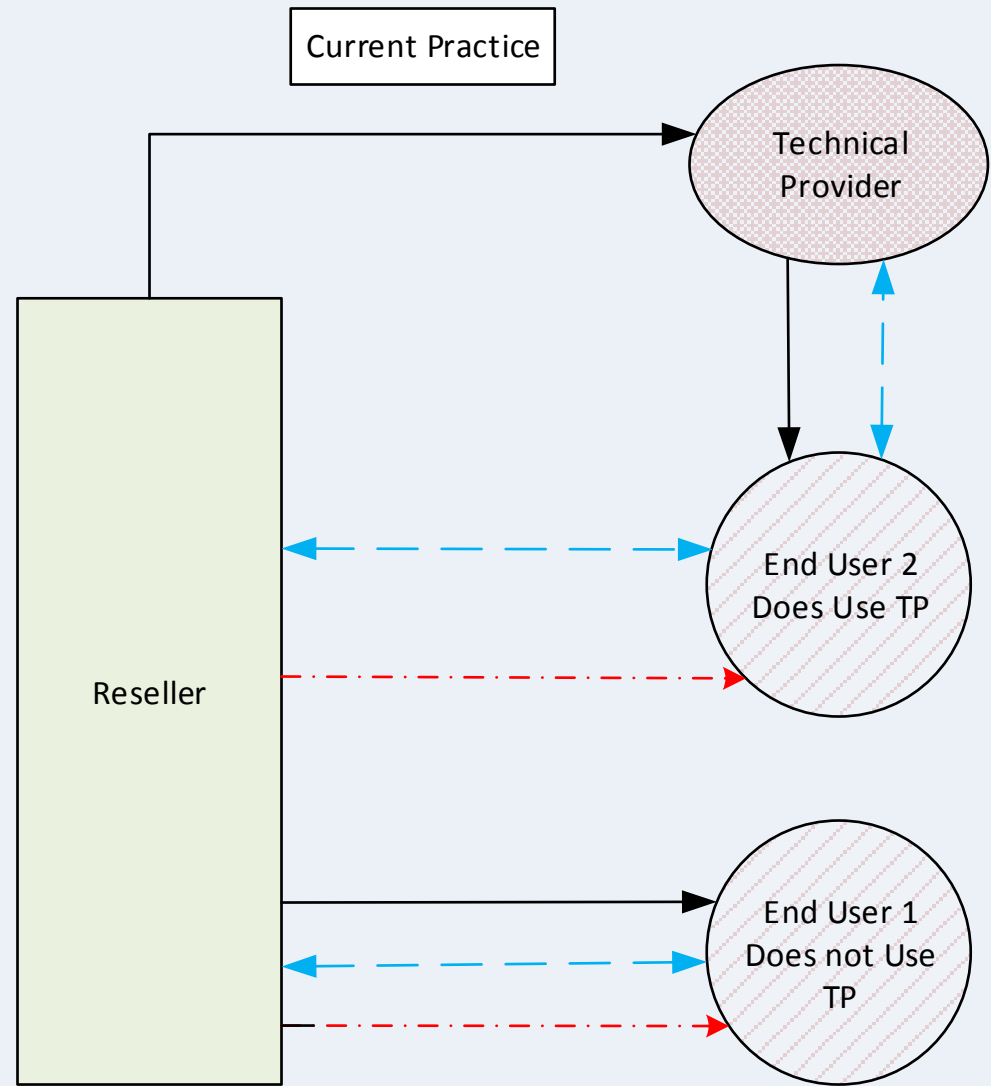
Christi Lawson — NCRA legal counsel, Partner at Foley & Lardner

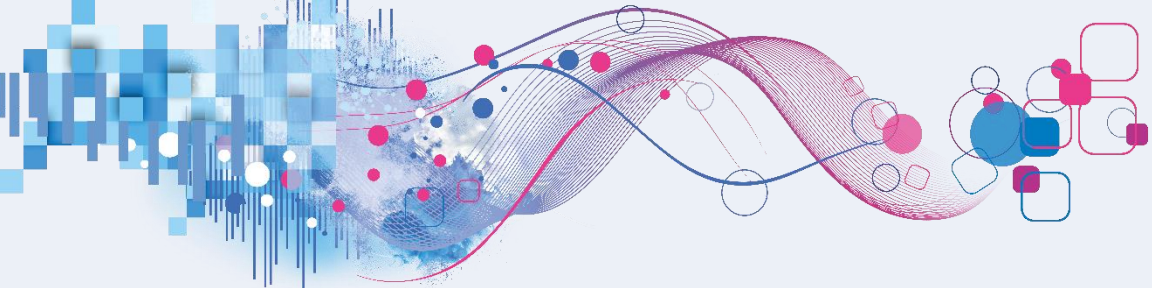
Questions???

Submit your questions as they occur via Goto Webinar Chat
and we will address them at the end of the call



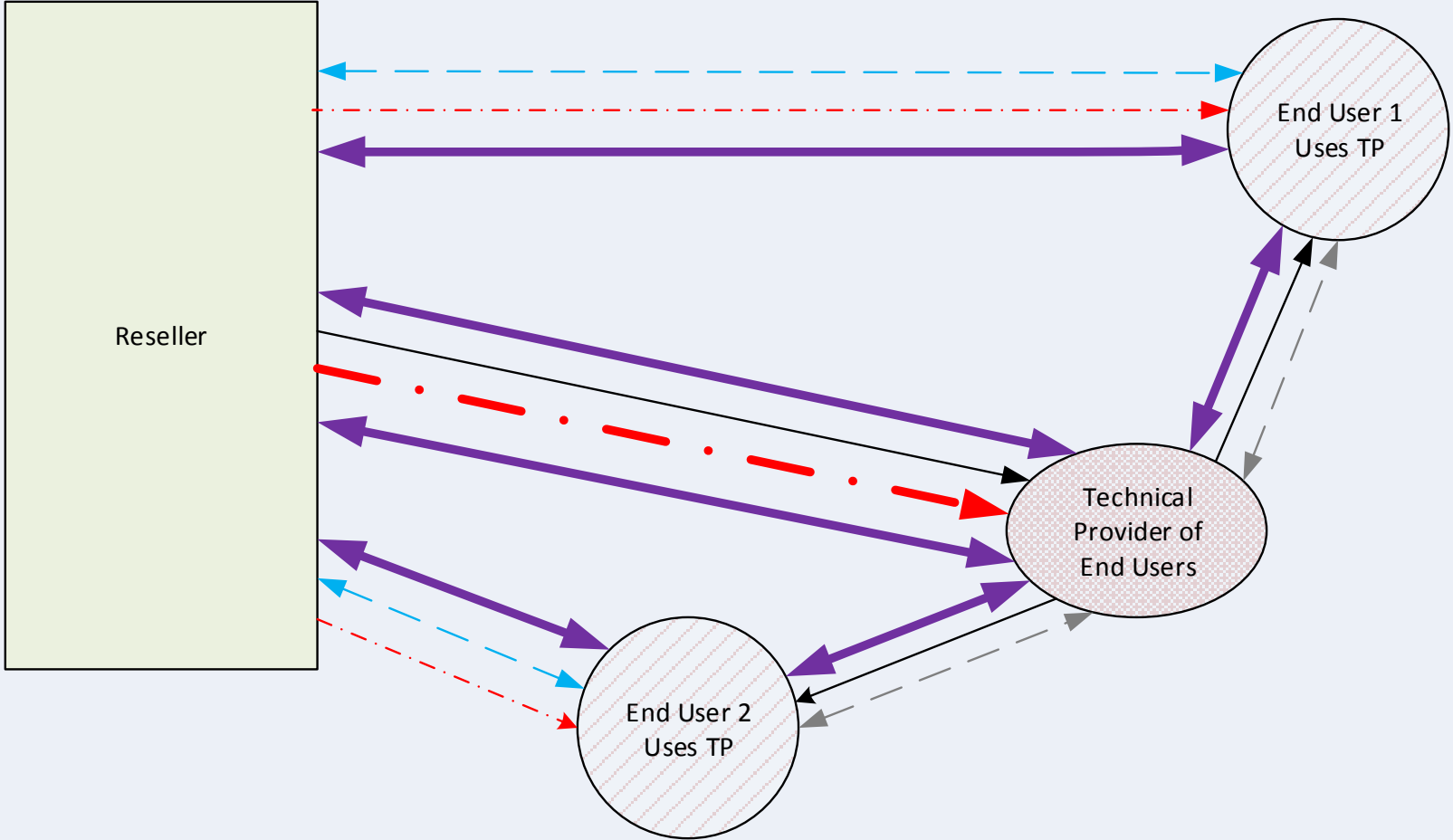
- No Technical Provider used
- Technical provider not recognized as Agent of End User

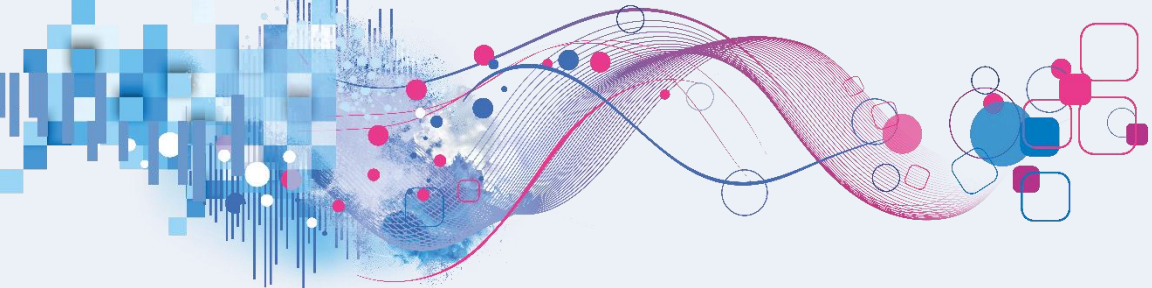




Experian Requirement
1 TP Multiple End Users
(3-way Agreement Reseller/EU/TP)
without
NCRA Compliance Services

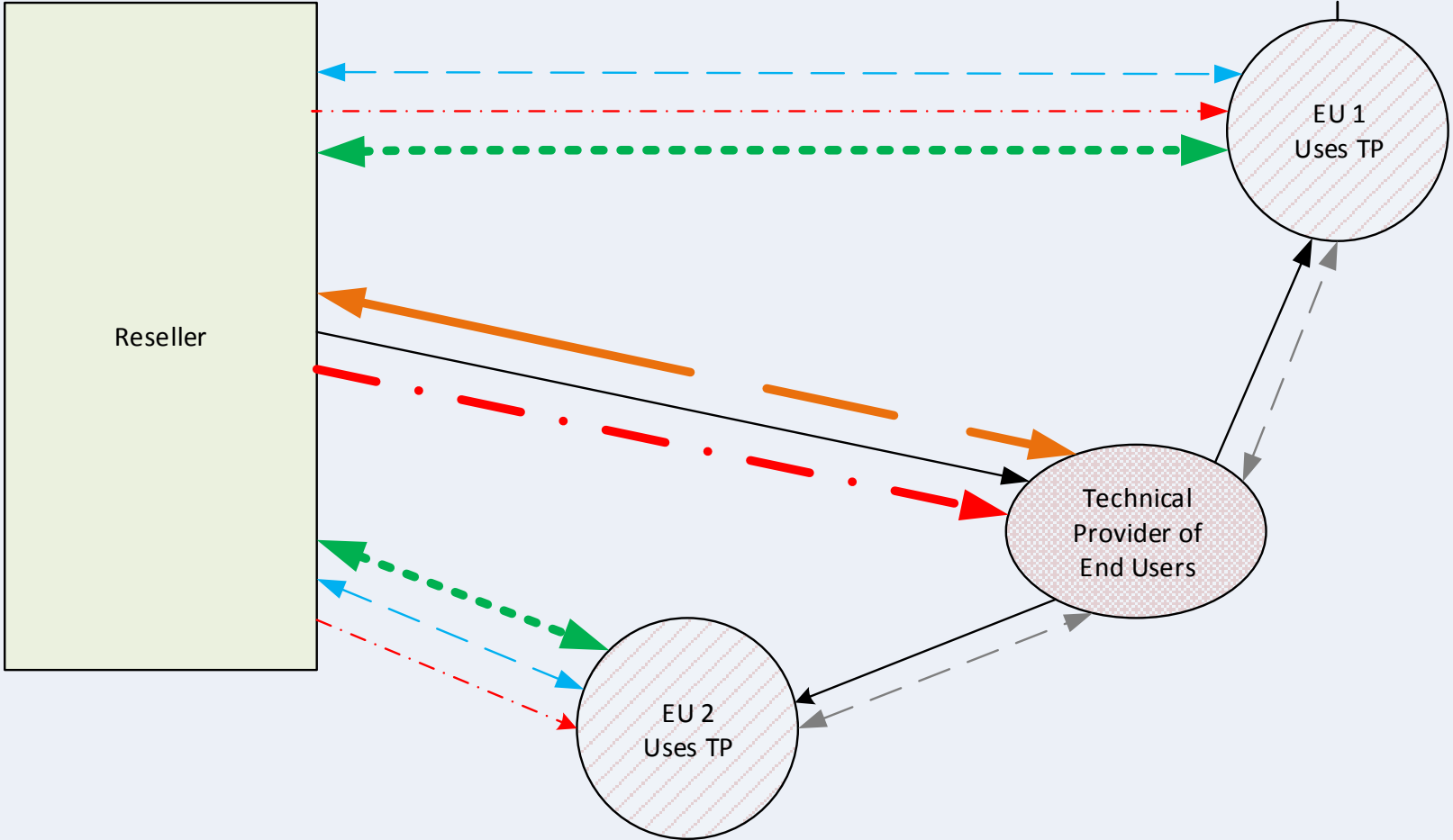
- Reseller:**
- Vets Technical Provider, once.
 - Executes a 3-way agreement with each combination of End User and specific vetted Technical Provider.

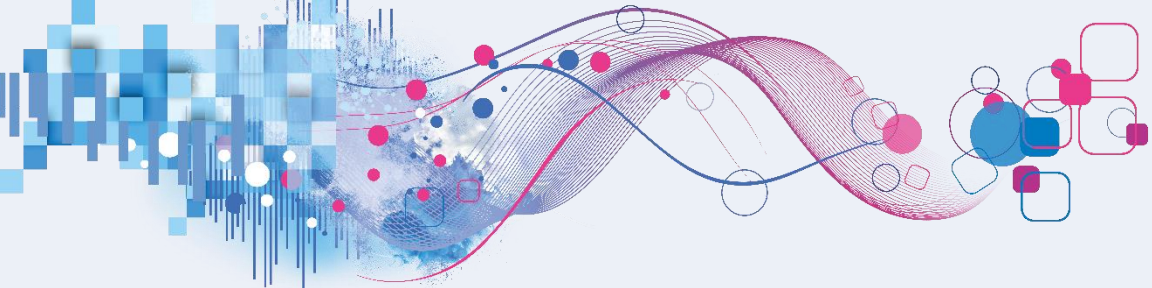




Experian Requirement
1 TP Multiple End Users
(UE Amendment to EU/MasterAgency with TP)
without
NCRA Compliance Services

- Reseller:**
- Vets Technical Provider.
 - Executes a Master Agency Agreement with Technical Provider.
 - Executes an Amendment to the End User Agreement to name specific vetted Technical Provider





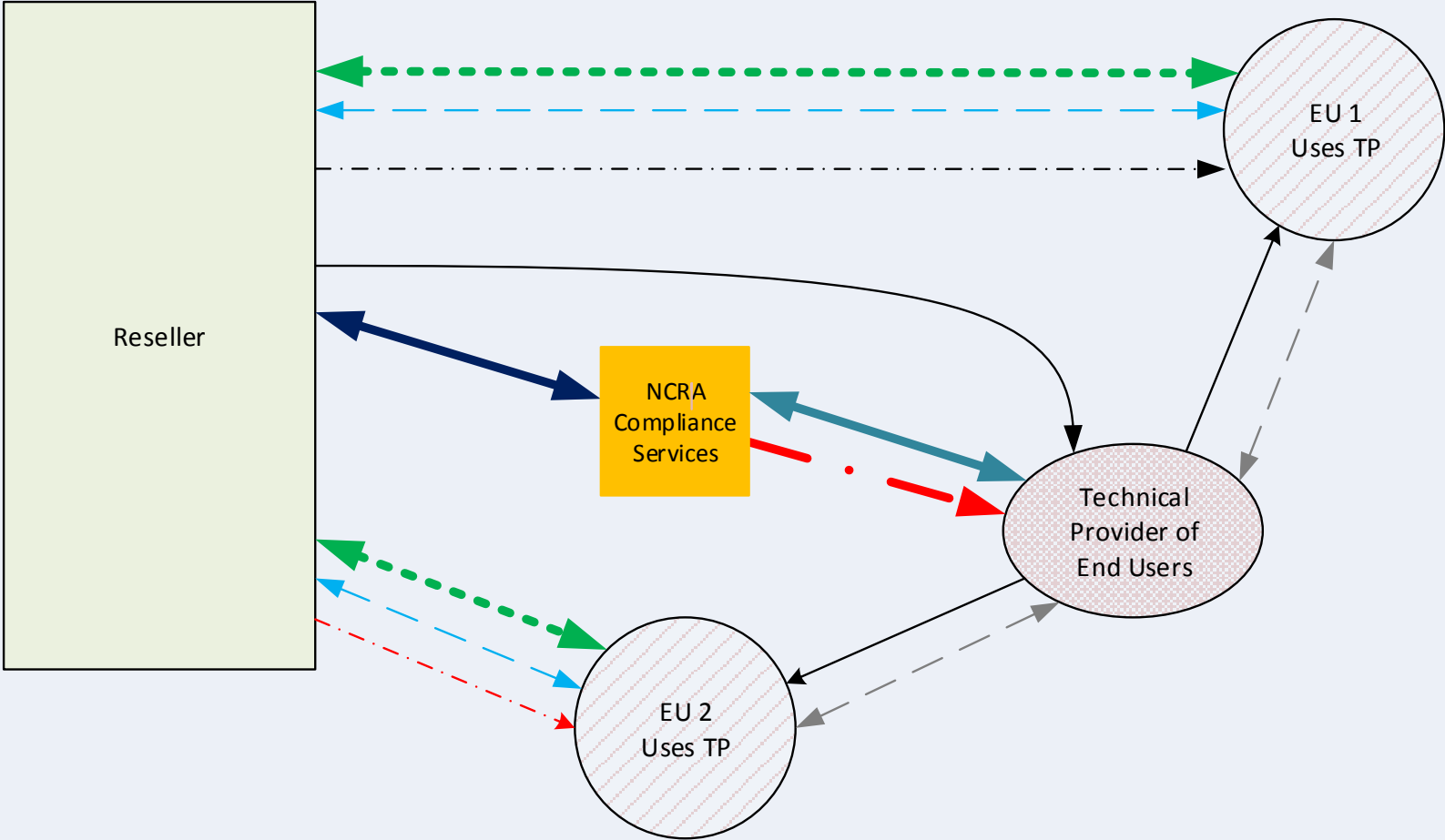
FUTURE
Experian Requirement
1 TP Multiple End Users
with
NCRA Compliance Services
(NCRA Master Agreement with TP and Reseller)

NCRA Compliance Services:

- Vets Technical Provider, once.
- Executes a Master Agency Agreement, once
- Makes vetting documents and Master Agency Agreement available to Reseller to support the relationship for reasons that include the Experian Third Party Risk Assessment

Reseller:

- Execute an amendment to the End User Agreement to name the specific vetted Technical Provider.



From: Hegarty, Dan <dan.hegarty@experian.com>

Sent: Monday, October 15, 2018 2:48 PM

To: Hegarty, Dan <dan.hegarty@experian.com>

Subject: IMPORTANT REMINDER from Experian concerning vetting End User Technical Providers

Dear Reseller Clients,

On November 30th 2017, Experian announced that the National Consumer Reporting Association (NCRA) was now authorized to coordinate and perform the compliance vetting and contracting of the End User's Third-Party Technology Providers ("Technical Providers" or "TPs"), which receive Experian data on the Reseller's behalf, like Reseller's production system. A TP is an entity contracted with the End User to, among other functions, access Reseller to receive Experian Information. In that capacity, TP will access, transmit, store, or process Experian information and will need to comply with Experian data security policy.

As you know, Experian takes its responsibility to safeguard consumer information seriously, and the process of vetting TPs is closely aligned with vetting End Users. This new option to leverage NCRA to perform the vetting is designed to avoid cases where a TP would need to be vetted by many Resellers. NCRA will be furnishing the appropriate materials needed by TP to comply. Utilizing NCRA will enable Resellers to remain compliant with Experian Reseller Policy and Procedure while still providing a path that will perform the vetting and retention of required records needed to demonstrate Reseller's compliance during periodic Risk Reviews. The documents will be available by Reseller and Experian as needed through a NCRA online portal.

The vetting process is already complex, since Reseller will need to contract or amend its End User contract to identify End User's TP(s) used accesses Experian Information via Reseller. Samples of the agreement/amendment needed can be found on the Experian Reseller HUB.

It is recommended that Resellers develop, as part of their Compliance Management Program, an internal procedure to review all TP vetting including contracts, regularly and specifically as preparation for a Risk Review.

If you have questions about this process or how NCRA can help you with TP vetting compliance, please call or email:

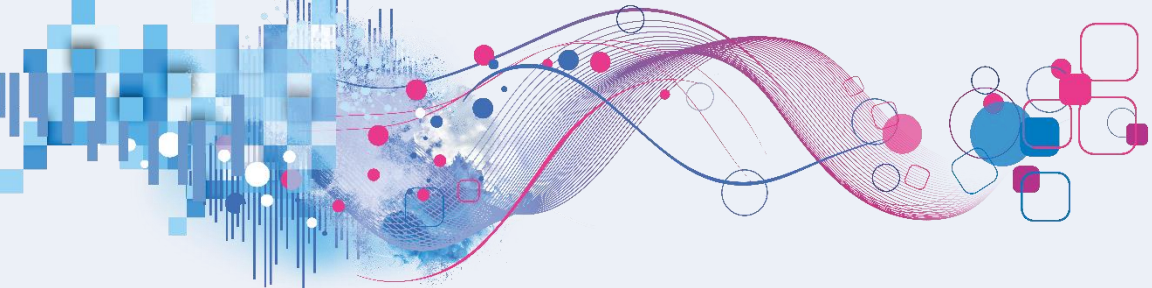
NCRA

Main Phone Number: 630-539-1525

- Roy Goodwin – NCRA Director Compliance Services EMAIL: Rgoodwin@ncrainc.org
- Terry Clemans – NCRA Executive Director EMAIL: Tclemans@ncrainc.org
- Jan Gerber – NCRA Office Manager EMAIL: Jgerber@ncrainc.org

Experian

- Contact your Experian Relationship Manager



The
Team



Dan Hegarty — Sales Operations Senior Director

Carol Najera — Third Party Compliance Manager

Ash Kotecha — Senior Manager Third Party Security North America

NCRA Compliance Services (NCRACS)

Vetting third party technology providers (TP) so you don't have to!



NCRACS is an option for all resellers (regardless of membership status) to handle the TP vetting and contracting process. The resellers who choose this option will be part of a single TP contract and site inspection VS. each reseller needing to obtain their own contract and site inspection for every TP in use by their end users. NCRACS has identified more than 600 TPs serving the mortgage lending, property management, and employment industries. Using a one-to-many contract feature, NCRACS will create an efficient and less intrusive experience for the technology provider, avoiding the duplication of contracts and site inspections and lowering the cost of compliance to the reseller.

The only portion of the TP vetting process that NCRACS will not handle for the reseller is the contact with the end user to obtain the "End User Technology Provider Addendum" which needs to be signed by all end users as soon as possible. This update to your end user agreement is the very first step in the TP compliance process, and these addendums will be part of future Experian Risk Reviews.

NCRACS vs. In-house TP Compliance

Attention Resellers –

If you do not have TP identification and language from the Experian End-user TP addendum in your End-user agreement please begin obtaining those right away!

End User TP vetting will be an item of increased focus in the Risk Reviews in the coming months.

NCRACS does not have contact with your End-user – We handle the TP contracts and initial site inspection.

| NCRACS | In-house TP Compliance |
|---|---|
| Reseller obtains End-user TP addendum from each of their End-users, identifying all the TP's that have access to Experian data | Reseller obtains end-user TP addendum from each of their End-users, identifying all the TP's that have access to Experian data |
| Reseller signs TP 3 way agreement with NCRACS to authorize NCRACS to act on Reseller behalf with respect to this TP compliance process and NCRACS Service Agreement with Remote Vender/NCRACS Sub-License | Reseller needs to identify each TP used by each end-user and prepare contract for TP as defined in Experian Hub. |
| Reseller adds End-user agreements including TP addendum into Remote Vender/NCRACS | Reseller contacts each TP to obtain copy of TP's Experian technology questionnaire |
| NCRACS contacts, vets, conducts site inspection and contracts with each TP for all resellers choosing this option. See slide 7 of the PowerPoint deck attached. All information is entered into Remote Vender/NCRACS for both reseller and Experian auditors to monitor for real time progress – compliance completed! | Reseller must confirm with Experian TPs successful passing of Experian technology questionnaire and then send TP contract for review and execution specifically for that reseller. |
| Compliance Peace of Mind for a Fraction of the Cost of the Site Inspections Alone | Reseller coordinates third party site inspection of the TP specifically for that reseller. |
| | Upon completion of the contract and site inspection reseller confirms with Experian that TP successfully passes final technology review conducted by Experian. |
| | Reseller develops system to track, maintain and update all TP vetting documents, contracts, and vetting timeline for proper updates |
| | Reseller repeats the process as needed for new accounts, for cause reinvestigations, and annually (responsibility varies per year – see Experian guidelines) to maintain proper data security compliance. |

NCRACS a Non-Profit Solution for Data Protection Compliance!

The Technology Provider TP Vetting Process – NCRACS

A Three step process –

This process begins only after the reseller has obtained the end-user TP addendum from their resellers and contracts with NCRACS. Reseller inputs end-user service agreement and TP addendum into NCRACS RemoteVendor and your done!

Both Experian TPR & Experian reseller risk review team will have access to NCRACS RemoteVendor to assist auditing – Real time TP vendor management

Step 1. TP completes the Experian SAQ and NCRA provides that to Experian Third Party Risk Department (TPR) via NCRACS RemoteVendor

To progress from each step requires review and approval by Experian TPR

Step 2. a. TP signs Master NCRA CS Agreement connecting TP/Reseller/End-user/Experian – A one to many contract to protect all participants

b. NCRA orders initial site inspection (TrendSource) and collects other TP data entering it into NCRACS RemoteVendor

Step 3. After Experian TPR has reviewed the TP initial site inspection and contracts, if approved TPR will proceed with Experian onsite security assessment

NCRA CS – 4 Agreements

Christi Lawson — NCRA legal counsel



- ✓ Reseller addendum – Reseller’s responsibility

NCRACS will not be in contact with your end-user to identify TP’s

NCRACS works with the TP and Experian so you only have to address your customers with your agreements – Leaving the TP’s to us!

- ✓ NCRA CS Reseller Fee & Software Services Agreement
- ✓ Two Way Agency Agreement
- ✓ Master NCRA Compliance Agreement -

This agreement connects the Reseller/Experian/TP for compliance

Marc Riccio – President
Specialized Data Systems



All-In-One Operational Risk Management Suite

RemoteComply® is a cloud based risk management suite which allows the financial services organizations to easily manage all areas of operational risk management under one platform. The “all in one” suite is easy to use, role dependent and web based. The products interface together eliminating double data entry and saving valuable time and resources.

- RemoteVendor – Custom version vendor management built to NCRACS specifics
- RemotePlan – Business Continuity Plan
- RemoteNotify – Emergency Communication Platform
- RemoteIncident – Incident Response Solution
- RemotePolicy – Policy and Procedure Document Management

THE THREE NCRA CS VIEWS

1. NCRA CS 2. Reseller 3. Experian

Roy Goodwin — Compliance Director, NCRACS

Heidi Smith — Project Manager and Business Analyst, Specialized Data Systems

The screenshot displays the NCRA CS web application interface. At the top, there is a navigation bar with the following items: Home, My Company, Resellers, End User, Technology Providers, and Reports. Below this is a secondary navigation bar with Dashboard, Support, and Privacy. The main content area features a "Message Board" section with a table of messages and a "Technology Provider Chart" section with a table of providers.

Welcome RGoodwin@ncrainc.org

Reset Password Logout

Message Board

| Date | Message | Posted By | Action |
|------------|---|----------------------|------------------|
| 7-5-2018 | Just checking on who can see this message | RGoodwin@ncrainc.org | [Reply] [Delete] |
| 7-24-2018 | So we don't respond, just add a new message | RGoodwin@ncrainc.org | [Reply] [Delete] |
| 10-24-2018 | welcome to the page | BCarter | [Reply] [Delete] |

Technology Provider Chart

| Technology Provider | Created Date |
|---------------------|--------------|
| 1234 Other | 10-29-2018 |

HOME | MY COMPANY | RESELLERS | END USER | TECHNOLOGY PROVIDERS | REPORTS

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NCRA CS Fee Schedule

Initial Set Up Fee
\$150.00
Member &
Non-Member

| Member | Non-Member |
|---|---|
| RemoteVendor/NCRACS Annual technology fee \$500.00 | RemoteVendor/NCRACS Annual technology fee Mortgage Reporting/Resident Screening CRA \$1,000.00 Employment Screening only/Other CRA \$750.00 |
| Fee per TP identified by the Reseller End-User TP addendum \$35.00 | Fee per TP identified by the Reseller End-User TP addendum Mortgage Reporting/Resident Screening CRA \$50.00 Employment Screening only/Other CRA \$42.50 |



Questions???

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