Active Duty Alerts Policy

Collections; Customer Service; Transaction Services

Policy Owner: iCreditWorks

Servicing Agent: Total Card, Inc. Product: iCreditWorks

BIN:

# Background

Amendments to the Fair Credit Reporting Act allow any members of the military who are deployed from their regular posting to place an "active duty alert" on their credit reports. This is a measure that can help protect against identity theft for deployed military personnel because they might not be aware of problems occurring while they are overseas.

In order to place the alert, the military personnel and/or their designated representative need to contact of one of the three major credit reporting companies and request an active duty alert.

Any business that is approached about granting credit in a name on the Active Duty List must verify the identity before issuing that credit. Credit reporting agencies must also remove the military personnel from their prescreened marketing lists for credit cards and insurance for two years. The active duty alert generally lasts for a one-year period; it can be extended if deployment lasts longer than one year.

# Policy

When a person applies for an iCreditWorks installment loan, the consumer initiated Active Duty Alert, if placed on the applicant's credit report, is reported through Experian's statement codes. It is coded as "29" and defined as "ACTIVE DUTY ALERT STATEMENT."

The application is pended and becomes subject to the remediation requirements for applications that require additional documentation or a verification follow-up phone call.

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| **Version** | **Revised By** | **Brief Summary of Changes** | **Revision Date** |
| 1 | Paul Fretham | New policy | 5/6/18 |

Last Annual Review Completed by on Next Review Date: 6/1/2020