

UNITED STATES OF AMERICA

CONSUMER FINANCIAL PROTECTION BUREAU

ORDER TO FILE INFORMATION ON PAYMENTS PRODUCTS

Pursuant to the Consumer Financial Protection Bureau's (Bureau's) authority under Section 1022(c)(4)(B)(ii) of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), 12 U.S.C. § 5512(c)(4)(B)(ii), COMPANY is hereby ordered to file with the Bureau the information specified below.

Purpose

The information provided to the Bureau in response to this Order will help the Bureau to carry out Congress' mandate that the Bureau monitor for risks to consumers in the offering or provision of consumer financial products or services, including developments in markets for such products or services. *See* 12 U.S.C. § 5512(c)(1).

This is a market-monitoring order issued under Section 1022(c)(1) & (4) of the Dodd-Frank Act, 12 U.S.C. § 5512(c)(1) & (4). It is not a supervisory order issued under Sections 1025 or 1026 of the Dodd-Frank Act, 12 U.S.C. §§ 5515 or 5516, nor is it being issued under section 1052 of the Dodd-Frank Act, 12 U.S.C. 5562.

Order Terms and Procedure

The information required by this Order shall be filed pursuant to the terms of this Order, including the stated Instructions and Definitions at Tab 1. Responses are required to all questions listed in the attachment at Tab 2.

Timely responses to the request are legally required. *See* 12 U.S.C. § 5512(c)(4)(B)(ii). Responses are due on or before 5:00 PM Eastern time, December 15, 2021. The instructions below contain more information about how to submit your response.

As indicated below, you should contact the Bureau as soon as possible if you have any questions about the terms of the Order or the procedure for responding to it.

The Bureau will treat the information received in response to this Order in accordance with its confidentiality regulations at 12 CFR § 1070.40 *et seq.*

It is so ordered on October 21, 2021.

Rohit Chopra
Director
Consumer Financial Protection Bureau

Tab 1. Instructions & Definitions

Instructions

1. Your responses shall be accompanied by an affidavit or declaration, made by one or more officers of your company who are authorized to represent the company, affirming that the information is true and accurate and does not contain any omissions that would cause the response to be materially misleading.
2. Submission will be made to the Bureau via a Secure File Transfer Protocol (SFTP) server. Connection information will be provided. COMPANY will be responsible for ensuring connectivity to the SFTP server from its environment. Any questions about method of transfer should be discussed in advance with the Bureau.
3. Submit responses to Section F of this Order using the spreadsheet template provided alongside this Order.
4. Do not include any personally identifiable information that directly identifies any consumer, such as a consumer's name, address, telephone number, Social Security number, or account number.
5. When you have written policies or procedures that contain responsive information, you should provide those documents with your answer.
6. Unless otherwise specified, the requests seek information about current practices.
7. Files containing the information specified in or requested by the Order must be uploaded to the SFTP server on or before 5:00 PM Eastern time, December 15, 2021.
8. The Bureau may issue follow-up requests in connection with your responses.
9. If you have questions about the information specified in or requested by the Order, contact the Bureau as soon as possible to schedule a meeting on or before November 3, 2021, to resolve such questions. During this meeting, you must be in a position to attempt to resolve all issues regarding the Order. Be prepared to discuss your planned compliance schedule, including any proposed changes that might reduce your cost or burden while still giving the Bureau the information it needs.

Definitions

For purposes of the Order, the following terms have the following meanings:

1. "COMPANY" means _____ and any parent companies, wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, and all principals, directors, officers, owners, employees, agents, representatives, consultants, attorneys, accountants, independent contractors, and other persons working for or on behalf of the foregoing.
2. "Commercial User" means the non-consumer party that accepts payment from Consumer Users or otherwise makes use of the PRODUCT or PRODUCTS to engage in financial transactions with consumers. "Commercial Use" means such use of PRODUCT by Commercial Users.

3. “Complaints” means all PRODUCT-related complaints, disputes, reports, or any other expression of dissatisfaction made to Company by Consumer Users, whether communicated in writing or orally.
4. “Commercial Eligibility Criteria” mean requirements to become and/or remain a Commercial User.
5. “Consumer User” means a consumer who uses the PRODUCT or PRODUCTS. Where specifically indicated, Consumer User may also encompass prospective Consumer Users of PRODUCT or PRODUCTS. “Consumer Use” means the use of PRODUCT made by Consumer Users.
6. “Consumer Eligibility Criteria” mean requirements to become and/or remain a Consumer User.
7. “Consumer-Facing Intermediaries” are third parties that BOTH are involved in the delivery of PRODUCT AND have a contractual relationship with Consumer Users of PRODUCT. (For example, some C2C services involve the use of underlying payment credentials provided by third parties, such as network-branded debit or credit card account issuers or deposit account providers. Issuers and providers of these kinds of accounts are Consumer-Facing Intermediaries with respect to that C2C service.)
8. “Consumer-to-business payments” or “C2B” means consumer to business payments that are made primarily for personal, family, or household purposes so long as the transaction involves a US-based consumer. Business parties do not need to be within the United States for a transaction to be covered. Transactions in or enabled by cryptocurrency are encompassed by this definition.
9. “Consumer-to-consumer payments” or “C2C” means both domestic U.S. payments made by one consumer to another consumer and also payments from consumers in the United States to consumers outside the United States. In either case, the consumer payments are made primarily for personal, family, or household purposes. Transactions in or enabled by cryptocurrency are encompassed by this definition.
10. “Direct Product Data” means data that at any point in the Relevant Period COMPANY has collected (and then maintained) as a result of Consumer Use of PRODUCT. Direct Product Data may be about Consumer Users, Commercial Users, Consumer-Facing Intermediaries or other parties; its common feature is that it exists as a result of Consumer Use of PRODUCT.
11. “Indirect Product Data” means data that is BOTH (i) generated, at least in part, from Direct Product Data (and then maintained) by COMPANY; AND (ii) about individual Consumer Users or Commercial Users of PRODUCT. Indirect Product Data may include data that is obtained by combining Direct Product Data with non-Direct Product Data (whether that non-Direct Product Data is internal, externally-sourced, or both) or obtained by analyzing Direct Product Data alone.
12. “Other Transactions” means funds-loading or other funds-receiving transactions made primarily for personal, family, or household purposes that are not C2C or C2B transactions.
13. “PLANNED PRODUCT” (or “PLANNED PRODUCTS”) means any C2C and/or C2B payments product or service that COMPANY plans (or planned) to offer or provide to consumers, as well as any product or

service the COMPANY plans (or planned) to offer or provide to consumers in connection with facilitating such C2C and/or C2B payments, including but not limited to Other Transactions.

14. “PRODUCT” (or “PRODUCTS”) means any C2C and/or C2B payments product or service that COMPANY offers or provides to consumers, as well as any product or service the COMPANY offers or provides to consumers in connection with facilitating such C2C and/or C2B payments, including but not limited to Other Transactions.
15. “Product Data” means Direct Product Data and all data derived from Direct Product Data in the Relevant Period. (Indirect Product Data and Direct Product Data, accordingly, are non-exhaustive elements of Product Data.)
16. “Product Executive” means, for each PRODUCT, the single COMPANY executive that has the most primary responsibility for the development and operation of that PRODUCT. During the Relevant Period, there may have been a series of Product Executives for a given PRODUCT (as employees move in and out of different positions with COMPANY), but this definition means there will only be one Product Executive for a given PRODUCT at any one point in time.
17. “Relevant Period” means January 1, 2019, through September 30, 2021.
18. “Third Party” means any person, individual, representative, agent, business, company, vendor or service provider not employed or wholly managed by COMPANY. Except where specifically noted otherwise, the term excludes Consumer Users, Commercial Users, or Consumer-Facing Intermediaries, as those terms are defined in this Order.

Tab 2. Questions

Section A: Products

The Bureau is seeking information on specific payment products offered by COMPANY, including features of the payment products, ways in which payment products are marketed to consumers and businesses, fees that may be charged to consumers and businesses, and plans for evolving the product over time.

1. Identify each PRODUCT that COMPANY either currently offers or provides to consumers in the United States, or that the COMPANY has offered or provided to consumers at any point in the Relevant Period in the United States.
2. For each PRODUCT, in the Relevant Period:
 - a. State the name(s) of the PRODUCT, including internal names and names used in marketing or other materials provided to actual and/or potential Consumer and Commercial Users;
 - b. Describe the operation of the PRODUCT, including all features available in any part of the Relevant Period, and identify the names of those features, including internal names and names used in marketing or other external materials. Your description should include a list of all COMPANY units involved in development and operation of the PRODUCT, with a description of the role each such unit plays with respect to each different PRODUCT feature;
 - c. Provide written copies of product operating manuals or similar documentation that describes the operation of the PRODUCT and its different features that were provided to the Product Executive;
 - d. Describe how Consumer-Facing Intermediaries are involved in PRODUCT delivery to Consumer Users and Commercial Users. Your description should be sufficiently detailed to explain the different categories of Consumer-Facing Intermediary involved in PRODUCT delivery. In addition, explain how:
 - i. If at all, Consumer-Facing Intermediary involvement varies by feature of the PRODUCT; and
 - ii. If at all, PRODUCT use varies from the Consumer User perspective and from Commercial User perspective according to whether a Consumer-Facing Intermediary is or is not involved in PRODUCT delivery;
 - e. To the extent that PRODUCT delivery to Consumer and Commercial Users involves the participation of third parties that process or store consumer data relating to PRODUCT, describe the role played by such third parties. Your description should be sufficiently detailed to explain the different categories of such third party involved in PRODUCT delivery; and
 - f. State the dates that the PRODUCT has been offered or provided to consumers.
3. For each PRODUCT, in the Relevant Period:

- a. Identify and describe each fee COMPANY charges to Consumer Users to use the PRODUCT, including the type, name, most-recently applicable amount of each fee, circumstances under which each fee is incurred, and method for assessing each fee;
 - b. Identify and describe any discounts, promotions, or benefits offered or provided to consumers to encourage PRODUCT use;
 - c. Identify and describe each fee COMPANY charges Commercial Users to use the PRODUCT, including the type, name, most-recently applicable amount, and method for assessing each fee; and
 - d. Identify and describe any discounts, promotions, or benefits offered or provided to Commercial Users to encourage PRODUCT use.
 - e. Identify and describe each fee COMPANY charges to Consumer-Facing Intermediaries in connection with their role in PRODUCT use, including the type, name, most-recently applicable amount, and method for assessing each fee; and
 - f. Identify and describe any discounts, promotions, or benefits offered or provided to Consumer-Facing Intermediaries to encourage their involvement in enabling PRODUCT use.
4. For purposes of this question, performance indicators are metrics or other information that are or have been used to analyze the performance of a PRODUCT. For each PRODUCT, identify all performance indicators provided or otherwise made available during the Relevant Period to the Product Executive, about:
 - a. Consumer Use and/or engagement;
 - b. Gross and net revenue generated by Consumer Users;
 - c. Commercial Use and/or engagement;
 - d. Gross and net revenue generated by Commercial Users;
 - e. Consumer-Facing Intermediary involvement in PRODUCT delivery; and
 - f. Gross and net revenue generated by Consumer-Facing Intermediary involvement in PRODUCT delivery.
5. For each PRODUCT, provide all decks, presentations, reports, memos, and similar documents that pertain to the development of the PRODUCT that were provided or otherwise made available to the Product Executive during the Relevant Period. Do not exclude written documents that pertain to future development of PRODUCT. This request encompasses any decks, presentations, reports, memos, and similar documents that discuss or contain plans to improve any of the performance indicators specified in Question 4 that were provided or otherwise made available to the Product Executive during the Relevant Period.

6. If during the Relevant Period COMPANY has monitored the performance of any PRODUCT using any regularly-maintained metric, statistic, or other measure of performance not identified in response to Question 4, identify and describe those measures.
7. Provide all decks, presentations, reports, memos, and similar documents that pertain to PLANNED PRODUCTS that were EITHER: (a) provided or otherwise made available to the Product Executive for any PRODUCT at any point in the Relevant Period; OR (b) generated as part of ongoing significant activity or investment, during the Relevant Period, into COMPANY's development or assessment of any PLANNED PRODUCT.

Section B: Data Harvesting

The Bureau is seeking information about the data that COMPANY collects and retains as a result of consumers' use of PRODUCT. The Bureau further seeks to understand the kinds of data that COMPANY generates from this product use data—for example, through combining it with externally-sourced data or with other data obtained from the COMPANY's own operations or with data from both such sources. More generally, the Bureau seeks to understand the purposes associated with the harvesting of different data fields.

8. For each PRODUCT, identify all Direct Product Data by data field.
9. For each data field identified in response to Question 8:
 - a. Describe each data field, including what information the data field records. If a data dictionary or similar reference exists for internal or client use, provide the document in full.
 - b. State whether the data field is associated with an identified individual user of the PRODUCT, an anonymized individual user of the PRODUCT, or is aggregated across several users of the PRODUCT.
 - c. If the data field is aggregated, specify the level to which it is aggregated.
 - d. If the data is associated with an anonymized individual user, describe the steps that COMPANY takes to anonymize the data and to ensure that data cannot be re-identified by COMPANY employees or any other group that has access to the Direct Product Data.
 - e. Indicate whether collection of the data field is *only* used either to prevent fraud or otherwise to facilitate the delivery of PRODUCT to your customers (or both). If it is used for other purposes (whether that is instead of or in addition to one or both of these two purposes), describe each such purpose.
10. For each PRODUCT, identify all Indirect Product Data.
11. For each data field identified in Response to Question 10:
 - a. Describe each data field including what information the data field records. If a data dictionary or similar reference exists for internal or client use, provide the document in full.

- b. Indicate whether generation of the data field is *only* used either to prevent fraud or otherwise to facilitate the delivery of PRODUCT to your customers (or both). If it is used for other purposes (whether that is instead or in addition to one or both purposes), describe each such purpose.
12. Provide the current retention schedules for each data field identified in response to Questions 8 and 10, as well as copies of written retention policies that reflect such schedules.
13. Identify what data fields, if any, are obtained from Consumer-Facing Intermediaries in connection with Consumer User use of PRODUCT.

Section C: Data Use and Monetization

The Bureau is seeking information on how COMPANY monetizes the Product Data described above – including by improving service delivery to customers of the PRODUCT, by selling the data directly, and by selling advertising or other targeted content based on attributes derived from the data.

Service delivery

14. For each PRODUCT, describe how the COMPANY has used or is using Direct Product Data or Indirect Product Data in connection with developing, selling, or marketing that PRODUCT. Your description should be sufficiently detailed to explain the different categories of Direct Product Data or Indirect Product Data used for different service delivery purposes.
- a. Identify all units within COMPANY that have one or more employees with access to any Direct Product Data or Indirect Product Data in whole or in part because such employees are involved in developing, selling, or marketing PRODUCT.
15. For each PRODUCT, describe how COMPANY has used or is using Direct Product Data or Indirect Product Data in connection with developing, selling, or marketing *other* products or services that COMPANY provides consumers or commercial clients. Your description should be sufficiently detailed to explain the different categories of Direct Product Data or Indirect Product Data used for different service delivery purposes.
- a. Identify all such other products or services.
 - b. Identify all units within COMPANY that have one or more employees with access to any Direct Product Data or Indirect Product Data in whole or in part because such employees are involved in the developing, selling, or marketing of such other products or services.

Data sharing

16. By PRODUCT, identify each data field in the PRODUCT's Direct Product Data or Indirect Product Data that has been shared by COMPANY with, or otherwise been made available by COMPANY to, one or more third parties at any point in the Relevant Period. Describe the different categories of third-party recipients (including Consumer-Facing Intermediaries and Commercial Users, if applicable) using categories sufficient to cover the full set of recipients during the Relevant Period.

17. For each data field identified in response to Question 16, state whether any third party has obtained the data at any point in the Relevant Period in a manner that permits the third party to identify: (a) any individual Consumer User of the PRODUCT; or (b) any Commercial User of the PRODUCT.
 18. For each data field identified in response to Question 16, identify three third parties that have paid COMPANY in connection with receiving any data in such data field during the Relevant Period. Where applicable, you may identify the same third party with respect to multiple data fields. For each named third party:
 - a. Provide the most recent contract or contracts that controlled or controls the third party's use of Product Data during the Relevant Period;
 - b. Provide the most recent contract or contracts that governed or govern the compensation that COMPANY has received from the third party in connection with the sharing of any Product Data during the Relevant Period.
 - c. State the amount of gross revenue that COMPANY received from the third party in connection with the sharing of any Product Data during the Relevant Period.
 19. By PRODUCT, quantify the gross amount of compensation received by COMPANY in the Relevant Period from sharing Product Data. If your quantification depends in part on estimation (because some compensation is not monetary), state the amount of compensation that is estimated and describe the estimation method or methods used.
 20. To the extent not already identified in response to Question 18, identify by PRODUCT the three third parties that generated the most gross revenue to COMPANY in the Relevant Period in connection with their receipt of Product Data from COMPANY.
 21. For each PRODUCT, provide copies of all documents provided to, in the Relevant Period, the Product Executive, that contain projections for revenues that may be derived in whole or in part from sharing Product Data with third parties.
- Surveillance-based advertising and targeted offers
22. By PRODUCT, identify each data field in the PRODUCT's Direct Product Data or Indirect Product Data that COMPANY has used in connection with selling advertising or targeted offers during the Relevant Period.
 23. By PRODUCT, list all consumer attributes that at any point in the Relevant Period have been described to actual or potential purchasers of advertising or targeted offers. For purposes of this Order, consumer attributes are those that make some use of Direct Product Data or Indirect Product Data fields associated with PRODUCT.
 24. For each consumer attribute identified in response to question 23, state which data fields identified in response to question 22 are or have been used, during the Relevant Period, in whole or in part to identify the attribute or calculate the magnitude of the attribute.

25. By PRODUCT, for five consumer attributes identified in response to question 23, explain how the corresponding data fields (and, if applicable, other information) are currently used to identify the attribute or calculate the magnitude of the attribute. To respond to this question, you should include in your list of five consumer attributes:
 - a. The three consumer attributes that accounted for the most gross advertising revenue during the Relevant Period, and identify these by including relevant gross revenue information;
 - b. The three consumer attributes that account for the most gross revenue from advertising sales to consumer financial services providers, and identify these by including relevant gross revenue information.
26. By PRODUCT, quantify the gross amount of compensation generated for the COMPANY in the Relevant Period from all forms of advertising and targeted offer sales described in response to Question 22. If some quantification depends on estimation (because compensation is not monetary), describe the estimation methods used.
27. For each PRODUCT, provide copies of all documents, provided to, in the Relevant Period, the Product Executive, that contain projections for revenues that may be derived in whole or in part from selling advertising or targeted offers of the kind described in Question 22.

Section D: Access Restrictions

The Bureau is seeking information on the policies COMPANY uses to manage access to PRODUCT for consumers and commercial entities. The agency further seeks to understand whether—and, if so, how—COMPANY encourages or requires users of other COMPANY products or services to use PRODUCT. The Bureau also seeks to understand how COMPANY manages third-party involvement in PRODUCT delivery. In addition, the Bureau seeks to understand the steps that COMPANY takes to increase consumer use of its PRODUCT relative to other payment products by restricting consumer access to such alternative payments products.

Consumer User eligibility and other restrictions

28. By PRODUCT, describe how consumers have been onboarded during the Relevant Period so that they were able to use PRODUCT. As part of your response, provide:
 - a. Copies of any agreements, applicable at any point in the Relevant Period, that consumers must agree to in order to use PRODUCT. If the terms of such agreements vary across consumers, describe the different categories of applicable agreements, explain the reasons for those differences, and provide illustrative examples of such differences. If such variances are described in written policies, provide copies of those policies.
 - b. Copies of any other disclosures, including in-app screens and similar informational content, that consumers are provided in connection with onboarding. If the terms of such disclosures vary across consumers, describe the different categories of applicable disclosures, explain the reasons for those differences, and provide illustrative examples of such differences. If such variances are described in written policies, provide copies of those policies.

29. By PRODUCT, identify and describe any Consumer Eligibility Criteria used by COMPANY in the Relevant Period. Explain why COMPANY uses (or used) these requirements. If Consumer Eligibility Criteria are described in written policies, provide copies of those policies.
- a. Describe and explain any mechanisms by which an ineligible consumer can gain eligibility to become a Consumer User. Identify channels or media through which a consumer can contact COMPANY to dispute an adverse eligibility decision, and explain what employees monitor such channel or media. Identify COMPANY employee or employees with ultimate decision-making power over whether a consumer is eligible to be a Consumer User.
 - b. If use of the PRODUCT requires, or has ever required at any point in the Relevant Period, that consumers own, use, or subscribe to any other product or service (including any other PRODUCT) developed or operated by COMPANY, identify such products or services and explain why COMPANY uses such requirements.
 - c. If, at any point in the Relevant Period, COMPANY has ever denied eligibility for PRODUCT use to a consumer in part because a third party has made an adverse eligibility determination against that consumer's use of the third party's products or services, identify all such third parties, and explain why COMPANY's eligibility determinations were impacted in this way.
 - d. If, at any point in the Relevant Period, COMPANY has ever denied eligibility for PRODUCT use to a consumer in part because of information about a consumer generated by a COMPANY unit *not* identified in response to Question 2(b), identify all such other COMPANY units, and explain why COMPANY's eligibility determinations were impacted in this way.

30. If the COMPANY takes steps to limit the practical availability of PRODUCT to consumers who are *eligible* for Consumer Use, identify and describe those limitations. Explain why COMPANY uses each such limitation. If such limitations are described in written policies, provide copies of those policies.
31. If COMPANY places any limitations on which Consumer Users can use the full breadth of features of each PRODUCT, identify and describe those limitations. Explain why COMPANY uses each such limitation. If such limitations are described in written policies, provide copies of those policies.

Commercial User eligibility and other restrictions

32. By PRODUCT, describe how Commercial Users have been onboarded during the Relevant Period so that they were able to use PRODUCT. As part of your response, provide:
- a. Copies of any agreements, applicable at any point in the Relevant Period, that prospective and/or existing Commercial Users must agree to in order to use PRODUCT. If the terms of such agreements vary across such Commercial Users, describe the different categories of applicable agreements, explain the reasons for those differences, and provide illustrative examples of such differences. If such variances are described in written policies, provide copies of those policies.

- b. Copies of any other disclosures, including in-app screens and similar informational content, that prospective Commercial Users are provided in connection with onboarding. If the terms of such disclosures vary across such Commercial Users, describe the different categories of applicable disclosures, explain the reasons for those differences, and provide illustrative examples of such differences. If such variances are described in written policies, provide copies of those policies.
33. By PRODUCT, identify and describe any Commercial Eligibility Criteria used by COMPANY in the Relevant Period. Explain why COMPANY uses (or used) these requirements. If Commercial Eligibility Criteria are described in written policies, provide copies of those policies.
- a. Describe and explain any mechanisms by which an ineligible entity can gain eligibility to become a Commercial User. Identify COMPANY employee or employees with ultimate decision-making power over whether entities are eligible to be Commercial Users.
 - b. If use of the PRODUCT requires, or has ever required at any point in the Relevant Period, that existing or prospective Commercial Users make any use of any other product or service (including any other PRODUCT) developed or operated by COMPANY, identify such products or services and explain why COMPANY uses such requirements.
 - c. If, at any point in the Relevant Period, COMPANY has ever denied eligibility for PRODUCT use to an existing or prospective Commercial User because a third party has made an adverse eligibility determination against that entity's use of the third party's products or services, identify all such third parties, and explain why COMPANY's eligibility determinations were impacted in this way.
 - d. If, at any point in the Relevant Period, COMPANY has ever denied eligibility for PRODUCT use to an existing or prospective Commercial User because of information about that entity generated by a COMPANY unit *not* identified in response to Question 2(b), identify all such other COMPANY units, and explain why COMPANY's eligibility determinations were impacted in this way.
34. If the COMPANY takes steps to limit the practical availability of PRODUCT to entities who are *eligible* for Commercial Use, identify and describe those limitations. Explain why COMPANY uses each such limitation. If such limitations are described in written policies, provide copies of those policies.
35. If COMPANY places any limitations on which Commercial Users can use the full breadth of features of each PRODUCT, identify and describe those limitations. Explain why COMPANY uses each such limitation. If such limitations are described in written policies, provide copies of those policies.

Consumer-Facing Intermediary eligibility and other restrictions

36. By PRODUCT, for each category of Consumer-Facing Intermediary identified in response to Question 2(d), provide a representative contract or other agreements, including all attachments thereto in effect during the Relevant Period between any Consumer-Facing Intermediaries in such category and COMPANY.

37. By PRODUCT, describe all criteria that COMPANY in the Relevant Period has used to evaluate and determine company eligibility to be a Consumer-Facing Intermediary. Identify any characteristics that in the Relevant Period did or could have prevented a company from being considered as a Consumer-Facing Intermediary. To the extent that information responsive to this question is contained in written policy documents, provide copies of such material.
38. By PRODUCT, provide five examples of companies that approached COMPANY to become a Consumer-Facing Intermediary (after the point at which PRODUCT delivery involved Consumer-Facing Intermediaries) but were ultimately rejected. Indicate when this occurred and explain why each company was rejected.
39. If COMPANY has ever in the course of negotiating or entering into an agreement with a company to be a Consumer-Facing Intermediary, agreed with any party (whether or not a party to that contract) to any terms that are not included in the provided contract, identify the terms, the relevant parties, and when this occurred. Additionally, explain why COMPANY agreed to the terms.

Connection to other COMPANY products

40. If during the Relevant Period, COMPANY has made available to consumers other products for which PRODUCTS were or are the only payment mechanism available to consumers for some or all transactions involving those other COMPANY products, identify the other COMPANY products in question and the period during which this exclusivity persisted, and explain the reasons for such exclusivity.
41. If during the Relevant Period, COMPANY has made available to consumers other products for which PRODUCTS were or are the only payment acceptance mechanism available to Commercial Users for some or all transactions involving those other COMPANY products, identify the other COMPANY products in question and the period during which this exclusivity persisted, and explains the reasons for such exclusivity.
42. By PRODUCT, for all features described in response to Question 2(b), describe all opportunities for Consumer Users to make use of a competitor's comparable product or service in connection with using COMPANY's other products.

Section E: Select Consumer Protections

These questions seek information on how COMPANY addresses a number of aspects of consumer protection, including disclosures and other protections with respect to data practices about PRODUCT, the detection of fraudulent activities in connection with PRODUCT, methods for Consumer Users to address issues and problems concerning PRODUCTS, and any accompanying obligations under Federal consumer financial law and applicable Bureau rules and regulations.

43. By PRODUCT, describe how an existing or prospective Consumer User is informed about what Product Data COMPANY collects about them and their use of PRODUCT, about how that data is used, and about how long is retained. In addition:

- a. Provide all relevant disclosures, terms of use, privacy policies, in-app screens, and similar informational documents that provide existing or prospective Consumer Users with the information noted above;
 - b. If COMPANY obtains consent from existing or prospective Consumer Users for the collection and retention of any data, describe how COMPANY obtains and records such consent;
 - c. Describe how an existing or prospective Consumer User declines to have data collected and/or retained, and what the consequences of declining would be, if any; and
 - d. If the procedures responsive to any part of Question 43 have changed in any way during the Relevant Period describe how they have changed.
 - e. If the procedures responsive to any part of Question 43 vary according to any characteristics of the existing or prospective Consumer User, describe and explain such variance.
44. Describe any processes or procedures that allow Consumer Users (and, if applicable COMPANY processes differ in this context, ex-Consumer Users also) to:
- a. View Product Data that COMPANY has collected or generated about their use of PRODUCT;
 - b. View any other data that COMPANY has collected about them in connection with, or related to, the PRODUCT or its use; and
 - c. Request that any such data be deleted (and explain how COMPANY ensures that consumers' requests are fulfilled).
- If any procedures responsive to Question 44 have changed during the Relevant Period, describe and explain such changes. If the procedures responsive to any part of this Question 44 vary according to any characteristics of the existing or prospective Consumer User, describe and explain such variance.
45. Describe how COMPANY's collection and generation of Product Data has differed, if at all, when a Consumer User is a child, teen, young adult, or falls into any age-based categories of Consumer User employed by COMPANY. Explain any such differences. If applicable data practices have changed in any way during the Relevant Period, describe and explain such changes.
46. Does COMPANY collect or generate any Product Data that relates to Consumer Users' race, color, religion, national origin, or sex (including sexual orientation and gender identity), marital status or age?
- a. If so, by PRODUCT, identify and describe the data fields that are collected or generated; and
 - b. If these practices have changed in any way during the Relevant Period, describe how they have changed.
47. Does COMPANY collect or generate any Product Data that relates to the race, color, religion, national origin, or sex (including sexual orientation and gender identity), marital status, or age of the owners of Commercial Users who are natural persons?

- a. If so, by PRODUCT, identify and describe the data fields that are collected or generated; and
- b. If these practices have changed in any way during the Relevant Period, describe how they have changed.

48. Identify and describe all internal categories of Complaints, including any subcategories, that COMPANY uses in responding to Complaints. For each category (and subcategory) identified, describe:

- a. How COMPANY determines whether a Complaint constitutes a “notice of error” or “billing error notice” as those terms are, respectively, used in 12 CFR 1005.11(b) or 12 CFR 1026.13(b);
- b. If a Regulation E or Regulation Z error investigation is conducted, the COMPANY units that conduct the investigation;
- c. The performance metrics that COMPANY uses in connection with addressing such Complaints; and
- d. If practices responsive to this Question 48 have changed over the Relevant Period, describe such changes.

49. Identify and describe all channels or other procedural methods by which Consumer Users can make a Complaint to COMPANY. For each channel or other method, describe:

- a. How many employees monitor the channel or method;
- b. What processes are in place such that an appropriate COMPANY employee works to resolve the Complaint;
- c. The performance metrics that COMPANY uses in connection with addressing such Complaints; and
- d. If your practices responsive to Question 49 have changed over the Relevant Period, describe such changes.

50. By PRODUCT, describe how COMPANY detects fraud or other illegal activity. Your description should include:

- a. The specific actions that COMPANY takes to detect and prevent suspected fraud;
- b. How, when and by whom a Consumer User is notified about suspected fraud;
- c. How a Consumer User can contact COMPANY with concerns about fraud or other illegal activity, including all channels through which COMPANY can be contacted;

- d. How and when a Consumer User who has lost access to PRODUCT use can regain such access if access was lost on the basis of an erroneous fraud determination;
- e. How and when a Consumer User who has lost access to PRODUCT use can regain such access if access was lost on the basis of fraud such as account takeover or identity theft;
- f. The performance metrics that COMPANY uses in connection with tracking fraud;
- g. If your practices responsive to this Question 50 have changed over the Relevant Period, describe such changes.

Section F: Usage Data/Metrics

These questions seek PRODUCT-use metrics and related information, including metrics on Complaint-handling.

51. For each PRODUCT, provide the following data, broken down on a monthly basis for the Relevant Period:

- a. Total number of Consumer Users who have at any time used the PRODUCT;
- b. Total number of Commercial Users who have at any time used the PRODUCT;
- c. Total number of Consumer Users with at least one transaction during the month;
- d. Total gross revenue, and gross revenue by each revenue source.
- e. Total dollar transaction volume, with a description of how this number is calculated. To the extent that a single PRODUCT involves more than one of the following categories of transaction, break down monthly dollar transaction volume by the following categories: C2C transactions; C2B transactions; and Other Transactions; and
- f. Total number of transactions, with a description of how this figure is calculated. To the extent that a single PRODUCT involves more than one of the following categories of transaction, break down monthly number of transactions by the following categories: C2C transactions; C2B transactions; and Other Transactions.

52. For each PRODUCT, provide the following Complaint-related data, broken down on a monthly basis, for the Relevant Period. To the extent that a single PRODUCT involves more than one of the following categories of transaction, break down your response into C2C transactions, C2B transactions, and Other Transactions:

- a. Total number of Complaints that COMPANY has determined constituted a “notice of error” or “billing error notice” as those terms are, respectively, used in 12 CFR 1005.11(b) or 12 CFR 1026.13(b);
- b. Mean and median time to resolution for Complaints identified in response to Question 52(a);

- c. Total number of Complaints identified in response to Question 52(a) that are resolved with a full or partial refund, with a description of how this figure is calculated;
- d. Total dollar amount of the refunds reported in your response to Question 52(c), using the same break-downs as reported in that response;
- e. For each category of Complaint identified in your response to Question 48, the total number of such Complaints;
- f. Mean and median time to resolution for Complaints identified in response to Question 52(e);
- g. For each channel or method of Complaint identified in your response to Question 49, the total number of such Complaints;
- h. Mean and median time to resolution for Complaints identified in response to Question 52(g);
- i. Total dollar amount COMPANY paid to Consumer Users following Complaints of any kind, with a description of how this figure is calculated; and
- j. Total number of Consumer Users COMPANY paid following a Complaint, with a description of how this figure is calculated.

Section G: Organizational Structure

These questions seek information about the organizational structure of COMPANY, as it relates to PRODUCTS, during the Relevant Period.

- 53. By PRODUCT if necessary, provide a graphical representation of the management structure of COMPANY sufficiently detailed to depict the current location of all COMPANY units identified in response to Question 2(b). If such location has changed over the course of the Relevant Period, describe and explain such changes.
- 54. By PRODUCT, provide the name and title of each Product Executive that served in that role at any point in the Relevant Period.
- 55. Describe any plans under consideration that would alter current management structure in a manner that would impact the location of COMPANY units that are or may become involved in PRODUCT or PLANNED PRODUCT delivery.