

# Consumer Fraud Investigations FAQs

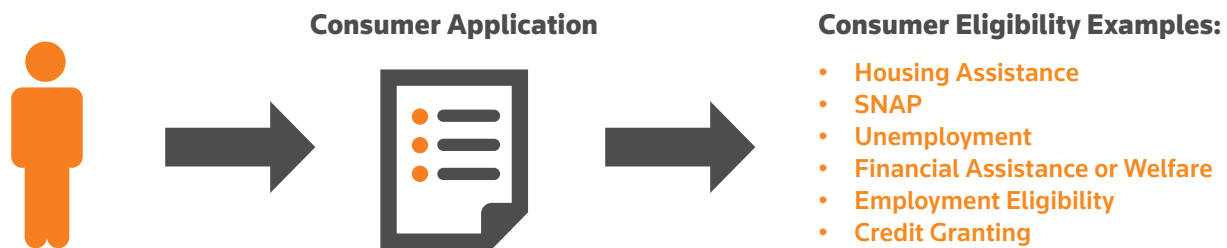
Customers from many markets rely on Thomson Reuters CLEAR® each day to fulfill their investigative and research needs. Our public and proprietary records are best in class and this data allows our customers to find critical information and make connections between people and businesses. CLEAR helps mitigate risk by providing professionals, government agencies, and law enforcement with a complete toolbox of trusted solutions for prevention, detection, and investigation. As fraud becomes easier to commit, CLEAR provides immediate insights to pull the full story together quickly and efficiently.

## Are there special considerations around consumer fraud prevention and investigations use cases?

Yes. Thomson Reuters is not a consumer reporting agency as defined by the Fair Credit Reporting Act (15 U.S.C. §1681 et seq) (FCRA). This means that our data cannot be used for eligibility determination purposes related to consumer applications for certain products or services.

## What is meant by “Eligibility Determination Purposes?”

“Eligibility determination purposes” means any permissible purpose authorized by the FCRA such as credit determinations, employment screening, insurance underwriting, and government services/benefits related to a consumer.



## What do I need to do to make sure I don't use CLEAR for a prohibited FCRA purpose?

Using CLEAR for any purpose authorized by the FCRA is STRICTLY PROHIBITED. To keep your consumer fraud prevention and investigation activities within the bounds of authorized use, we have developed the following guidelines:

- CLEAR may only be used by your fraud investigation, program integrity, or audit department and may only be used for investigative purposes.
- You may use CLEAR to determine if the information submitted to you is truthful, not whether the information meets the eligibility requirements of your program.
- CLEAR may NOT be used by Human Resources, Intake Teams, or any other department that is reviewing and making consumer eligibility determinations.
- CLEAR is a top class investigation tool, but you must validate the information supplied through CLEAR with the source of that data or a consumer reporting agency.
- No adverse action may be taken against any consumer based on CLEAR information or data.
- Consumers must be provided notice of your findings and have an opportunity to contest these findings and appeal any decisions.

### Please contact your client manager if you have any questions on the above.

Thomson Reuters is not a consumer reporting agency and none of its services or the data contained therein constitute a 'consumer report' as such term is defined in the Federal Fair Credit Reporting Act (FCRA), 15 U.S.C. sec. 1681 et seq. The data provided to you may not be used as a factor in consumer debt collection decisioning, establishing a consumer's eligibility for credit, insurance, employment, housing, government benefits, or for any other purpose authorized under the FCRA. By accessing one of our services, you agree not to use the service or data for any purpose authorized under the FCRA or in relation to taking an adverse action relating to a consumer application.

Use of this service to prevent or investigate fraud related to consumer transactions or applications is permitted upon West approval and provided: (1) no adverse action will be taken against a consumer based on the information provided through this service, (2) the service will only be used by your investigative department for this purpose, (3) use by any other department or for the purpose of determining consumer eligibility is strictly prohibited, and (4) you have and will maintain appropriate processes and procedures to allow consumer to contest and appeal any findings.