

October 5, 2018

ATT: Resellers of MVR's

FM: John Diana, Chief Compliance Officer, SambaSafety

Re: Identification of End Users

To Our Partners:

The purpose of this document is to inform resale partners of certain disclosure requirements under the Fair Credit Reporting Act (FCRA).

Section 607(a) of the FCRA specifies that every consumer reporting agency ("CRA") "require that prospective users of the information identify themselves, certify the purposes for which the information is sought, and certify that the information will be used for no other purpose." Section 607 also requires that CRA's "make a reasonable effort to verify the identity of a new prospective user and the uses certified by such prospective user prior to furnishing such user a consumer report."

The FCRA requires that resellers of consumer reports identify the end users of the reports to the CRA in part to enable the CRA to comply with its obligations under Section 607(a). The FCRA specifically addresses resale of consumer reports; Section 607(e) states the following regarding resale:

"(e) Procurement of consumer report for resale.

(1) **Disclosure.** A person may not procure a consumer report for purposes of reselling the report (or any information in the report) unless the person discloses to the consumer reporting agency that originally furnishes the report—
(A) the identity of the end-user of the report (or information); and
(B) each permissible purpose under section 1681b of this title for which the report is furnished to the end-user of the report (or information)."

Therefore, effective January 1, 2019, all resellers of SambaSafety MVR data must identify to SambaSafety the end user entity that will receive the report before distribution of the report to the end user customer.

Requirements for the identification of the end-user are as follows:

1. If you already provide 'Origination ID' no further action is required at this time
2. If you don't currently provide 'Origination ID' you must provide a unique company name for all end user customers who receive MVR data from you.
3. The name must be human readable for audit purposes.
4. The name must be provided in the 'Origination ID' field in each of your orders.
5. If you use an integrator to purchase MVRs from SambaSafety, we will be working with the integrator to collect this required data.

You may contact SambaSafety Customer Care for current specifications or if you have any questions.

John Diana

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Chief Compliance Officer
SambaSafety