

## ARTICLE 4

### Identity Theft Prevention

**Section 1. Identity Theft Prevention Program.** Cooperative management will maintain an identity theft prevention program (Identity Theft Prevention Program) that ensures the privacy and accuracy of member/consumer credit report information, reduces the incidence of identity theft and aids victims of identity theft by implementing standards of care and procedures allowing the detection, prevention and mitigation of identity theft when using member/consumer personal information within the possession of the Cooperative. The Program will comply with the Fair Credit Reporting Act of 1970, 15 U.S.C. Section 1681 et. seq. (FCRA), the Fair and Accurate Credit Transactions Act of 2003, 15 U.S.C. Section 605(h)(2) (FACT Act), and the Identity Theft Red Flag rules promulgated by the Federal Trade Commission on November 9, 2007, and found at 16 CFR Part 681.

**Section 2. Management Responsibility.** As a part of the Identity Theft Prevention Program, Cooperative management will:

- a. Establish procedures to identify and respond to risk factors called “Red Flags” to detect, prevent and mitigate identity theft from the Cooperative’s member/consumer personal information.
- b. Implement procedures for responding appropriately to evidence of identity theft and unauthorized use of member/consumer personal information.
- c. Provide for staff training and periodic review and updating of the Identity Theft Prevention Program.
- d. Provide for oversight, implementation and administration of the Identity Theft Prevention Program by the Cooperative’s senior management and governing board of directors.
- e. Identify the proper purposes for which member/consumer consumer reports, or credit information obtained from Consumer Reporting Agencies, may be used by the Cooperative.