



Focus on Privacy, Security and Credentialing

ChoicePoint strives to be a leader in the responsible use of information by employing a comprehensive risk management program for privacy, information and physical security, as well as customer credentialing.

The following is a short sampling of the framework ChoicePoint has in place to protect the valuable information that businesses and people alike rely on for their daily transactions.

FOCUS ON SECURITY

ChoicePoint's focus on security is company-wide, with all associates and contracted employees completing comprehensive annual training. The company's management also focuses on security and privacy concerns through a Security Advisory Committee, composed of members of the company's top level executive management team. This committee directs the execution of risk management strategies and approves related policies.

INFORMATION AND PHYSICAL SECURITY

To further our focus on security, ChoicePoint:

- Bases our information security policy on the ISO 17799 industry standard for information security. The policy is regularly reviewed to ensure compliance with new laws and regulations.
- Conducts background checks (known as credentialing) on all associates, temporary workers and individual independent contractors as a condition of employment at ChoicePoint. Additional background checks are performed every three years on an associate's anniversary date.
- Utilizes incident response teams that work to address potential security threats to the organization quickly.
- Implements technology solutions to address virus protection, intrusion detection, patch management, encryption, event monitoring and data protection.
- Restricts users' access to systems to those who require that access to perform their job functions. Access reviews occur regularly and approval is required for privileged access.
- Operates under a physical security policy that governs access to our data centers and other restricted areas.
- Performs vulnerability assessments on a regular basis on both internal and external networks.
- Assesses our systems against technical standards to ensure they meet or exceed baseline controls.

FOCUS ON PRIVACY

To enhance our company's focus on privacy, ChoicePoint:

- Has an Office of Credentialing, Compliance and Privacy. The chief privacy officer reports to the Board of Directors' Privacy and Public Responsibility Committee.
- Restricts customer access to sensitive personally identifiable information (SPII).
- Has more than 90 key privacy and security policies, procedures and guidelines and communicates them regularly to ChoicePoint associates.
- Has a formal information security breach response and notification policy and procedures to facilitate communication with customers/consumers/others in the event of a breach.
- Audits customer accounts to focus on permissible and appropriate use of data and use limitations. Contractual agreements are audited using random and event-driven audits.
- Conducts consumer sampling to ensure that end users verify permissible purpose for their information that is accessed by customers.
- Has a consumer advocate office to enhance transparency of the company's processes to consumers. The Office of Consumer Advocacy is responsible for building the relationship between the company and consumers, including educating consumers about ChoicePoint--why we have personal information, where it comes from, to whom the information is being given, how the information is being used and what benefit the consumer will receive as a result--and how they can request copies of their information via ChoicePoint's Full File Disclosure. The Office of Consumer Advocacy also provides consumers with a way to provide feedback on their personal information regarding whether or not it is accurate, current and complete information.

FOCUS ON CREDENTIALING

To ensure our customers have a legitimate need for our services, ChoicePoint:

- Operates a centralized Corporate Credentialing Center (CCC) to credential customers prior to allowing access to ChoicePoint's products, systems and information. The CCC verifies business credentials, permissible purpose and legitimate business purpose using multiple internal and external sources. Site inspections of customers' premises are conducted under certain circumstances.
- Requires third-party service providers that handle SPII to successfully complete security and privacy assessments.

INDEPENDENT REVIEWS OF CHOICEPOINT PROGRAMS

Our privacy, credentialing, physical and information security programs are regularly reviewed to ensure that we continue to enhance our practices. Some of these reviews include:

- The Office of Credentialing, Compliance and Privacy reviews credentialing, compliance and privacy functions across the company.
- An independent third party completes annual SAS70 Type II audits of key applications designated by the company's senior management.

- An internal audit function is in place and is responsible for auditing the integrity of financial reporting, credentialing processes and aspects of information security.
- An independent third party conducts annual physical security assessments of key locations designated by the company's senior management.
- An independent third party completes annual vulnerability assessments of key external and internal systems designated by senior management.
- Customers periodically conduct various audits of ChoicePoint's policies and procedures.
- An independent third party conducts biennial compliance audits of ChoicePoint's information security program reviewing administrative, technical and physical safeguards.

PUBLIC REACTION

Because of our programs and policies, we have received positive feedback from government officials, academics and privacy experts, complimenting the company on our privacy and information security practices.

“ChoicePoint transformed itself from a “poster child” of data breaches to a role model for data security and privacy practices.”

--Avivah Litan, Gartner Case Study, September 2006

“ChoicePoint had the attitude: ‘We want to make our privacy practices exemplary.’ They wanted to find out what kinds of things they could do better and get feedback about some of the ideas they were thinking about.”

--Daniel J. Solove, Associate Professor, George Washington Law School
New York Times, November 12, 2006

ChoicePoint was ranked among the top 25 providers of consulting and business services in the 2006 listing of the InformationWeek 500. ChoicePoint was cited for its innovation in information technology, including authentication solutions and information security.

--InformationWeek

“They’ve put in place practices that I wish all the data brokers would adopt.”

--Beth Givens, Privacy Rights Clearinghouse
New York Times, November 12, 2006

“Overall BT INS found that the level of maturity and effectiveness of the information security program at ChoicePoint to be above the industry standard within BT INS’ experience. Everything from policy and procedure implementation to compliance was implemented flawlessly by ChoicePoint. The overall CMM score of 3.42 shows a very strong security program that is robust and mature. ChoicePoint is a very strong candidate to certify against part 2 of the ISO17799:2005 standard which will further validate all the hard work and dedication that ChoicePoint has shown in building a first class information security program.”

-- BT INS, an independent consulting company, April 2007

“ChoicePoint has become a model company.”

-- Senator Charles E. Schumer, D-New York
New York Times, November 12, 2006

“The once-obscure data broker, tucked away in a nondescript business park 20 miles north of Atlanta, also embraced extensive reforms. The result: ChoicePoint is regarded by a dozen leading privacy advocates interviewed by *USA TODAY* as the most responsible company among dozens in the lightly regulated, fast-growing field of aggregating and selling sensitive information.”

--USA Today, April 2, 2007

QUESTIONS ABOUT SECURITY, PRIVACY OR CONSUMER ADVOCACY?

ChoicePoint is happy to share more information about our privacy, information security and consumer advocacy practices. To learn more, please visit www.privacyatchoicepoint.com or contact your account representative.

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