PRIVACY POLICY FOR THE REGISTRATION WEB SITE OF THE FTC CREDIT REPORT ACCURACY STUDY

The <u>Federal Trade Commission (FTC)</u>, an independent agency of the United States Government, is conducting a study on the accuracy of credit bureau information. This <u>Web site</u> is being used to register participants for the study.

This <u>Web site</u> is operated under contract by the <u>University of Missouri</u>, which is serving as the lead member of the FTC's research team. (<u>George Washington University</u> and <u>Fair Isaac</u> <u>Corporation (FICO)</u> are also assisting the FTC in the research for this study.)

Please read the privacy policy below to learn what information is being collected by this <u>Web site</u>. The FTC and its research team take your privacy seriously, and we want you to know why this information is being collected, and how it will be used and protected.

1. What information does this Web site collect?

Information collected automatically. When you visit this Web site, it collects some information automatically, including the time and date of your visit, the Internet Protocol (IP) address associated with your visit, etc. ("log" information). This log information is anonymous and does not identify you personally. The information is generally used for management of the Web site, for general Web statistical purposes, and to maintain Web site security, such as monitoring Web site traffic to detect unauthorized attempts to upload or change information or cause other damage.

In addition, this Web site uses "cookies" technology. A cookie is a small hidden text file that a Web site creates and places on your computer. A cookie can collect (compile) and maintain information about your Web site activity, including personal information you submit to the Web site or pages your have viewed while you are visiting that Web site ("session" or "non-persistent" cookie), or even after you leave the Web site and return to it later ("persistent" cookie). Web browsers allow you to control cookies by not accepting them or by deleting them from your computer, if you have previously accepted them.

Only session (non-persistent) cookies are used on this Web site for the FTC study. You must accept these cookies for the Web site to work properly with some Web browsers. If your browser requires cookies and you do not accept them, the Web site will not allow you to register for this study. When you close your Web browser, your computer automatically deletes the cookies you accepted, and any information collected by those cookies is no longer stored.

You may read the <u>University of Missouri's privacy policy</u> to learn more about the purpose, use, and handling of information that is automatically collected by this registration Web site, and by other Web sites hosted by the University.

Information submitted, or generated and maintained, during the registration process. If you are visiting the Web site to register and participate in the study, this Web site will ask you to provide: name (first, last); address (street, city, state, ZIP); phone number and best time to call; e-mail address; a self-assigned password, and a "study code" that indicates how you learned about the study (see below). The Web site will also create, record, and provide you a unique login ID that you will need to use (with your self-assigned password) at another Web site to continue your participation in the study (see below). The site will also generate you a voucher number that you will also need to have and use when you visit the other Web site (see below).

Information submitted to the FICO Web site for this study: After you register for the FTC's study at this Web site, you will be referred to the credit report Web site maintained by FICO (<u>www.myFICO.com</u>) to continue your participation in the study, as explained below. To understand what information the FICO Web site asks you to provide, and how that Web site handles that information, please visit the <u>privacy policy</u> for that site.

2. Why is this information being collected?

The purpose of the information collected through this Web site is to register individuals participating in the FTC's study, which the FTC is required to conduct under the Fair and Accurate Credit Transactions Act of 2003 (FACT Act or FACTA). (As noted above, please visit the University of Missouri's privacy policy to understand the purpose for "log" information that is automatically collected when you visit a Web site that it hosts.) The Web site collects your name, address, e-mail address, phone number and best time to call, in order for the FTC's research team to contact and interview you for the study. The Web site will also ask you to enter a "study code" that will tell our research team how you learned about our study. (This study code will be provided to you when you are solicited for the study by the FTC or other companies or entities who may be working with the FTC to identify potentially qualified participants.) An added purpose of this code is to prevent others who have not been identified for participation from unnecessarily using or interfering with the registration site.

As noted above, the Web site assigns and keeps track of a unique login ID assigned to you, and a password you will choose. The purpose of that information is for the FTC's research team to get a copy of your credit reports and scores from the <u>FICO web site</u>, once you have established your own account at that site, using the same login ID and password information, as explained below.

3. How will the information be used?

The contact information collected by this Web site will be used by the FTC's research team to contact you for interviews to discuss your credit report and scores. If you identify significant errors during these interviews, the FTC's research team will ask you to dispute the errors with a credit bureau, and let the research team know. The contact information will allow the team to follow up with you if they do not hear from you, or have additional questions. Your login ID and password, which are not part of this contact information, are used by the research team solely to obtain copies of your credit reports and scores from the <u>FICO Web site</u>. The registration Web site for the FTC's study will not automatically transfer your login ID or password information to the

FICO Web site. Rather, you will be instructed during the registration process to use the same login ID and password when you visit the FICO Web site. That site requires every user (whether or not they are participating in any study) to enter a self-selected ID and password for purposes of establishing a personal myFICO.com account, before downloading credit reports and scores from that site. (You will not be charged for your download, since you will also receive a voucher number during the study's registration process that you can enter at the FICO Web site for a free download.) Once you establish your myFICO account, using your assigned login ID and password (and the voucher number for a free download) from this Web site, the FTC's research team will then be able to visit the FICO Web site and use your same login ID and password to access your account at that site, and download a copy of your credit report and scores for purposes of the study. The study code collected by the registration Web site can be used by researchers to determine how you were referred for participation in the study (e.g., by a bank).

4. With whom will the information be shared?

The information collected by this registration Web site will be available to the FTC's research team for the purposes described earlier. The FTC will not receive your contact information from the research team, so it will not be part of any FTC (government) records and will not be part of the FTC's report to Congress. FICO also will not have access to any of the contact information collected from you through this Web site. The only way FICO will obtain your login ID, password and voucher number created during the registration process is when you voluntarily choose to use that information on <u>FICO's Web site</u> in creating an account at that site, when it asks you to enter a self-selected login ID, password and a voucher number before you can download your free credit report and scores from that site, as described earlier. The FTC's research team works under contract to the FTC for purposes unrelated to the study. If the FTC or the research team receives a subpoena or other legal process, however, the FTC and/or its research team may be legally required to make the information available in response to that subpoena or other legal process.

5. Will there be notice and any opportunity to consent to the kind of information this Web site collects or with whom it will be shared?

Yes. When you register for the FTC's study through this Web site, this privacy policy and other related notices will remind you what information is being collected, and with whom it will be shared. As already explained, the information must be collected, used and shared as described above in order for the FTC to accomplish this study while protecting your privacy as much as possible. If you decide to register for this study, you are agreeing (consenting) to the collection and use of your information for the purposes we have explained. If you do not want to submit the information requested by this Web site, then you are not required to do so, but you will not be registered to participate in the study. Your participation is completely voluntary, and there is no effect on your credit reports or scores if you do not participate.

6. How will your information be secured?

The information is secured by the host for this Web site (<u>University of Missouri</u>). You may read their <u>privacy policy</u> to learn more. In particular, information submitted through this Web site is protected by secure encryption technology designed to prevent your information from being intercepted when your computer sends your information over the Internet to this Web site. Access to any of your information stored in electronic databases is protected by passwords. Information will be deleted when no longer needed for the study, and any paper copies shredded. Members of the research team receive appropriate training and instructions, and must sign confidentiality agreements. The study has also been designed to protect your privacy by separating the registration process from the credit report downloading process that occurs at FICO's Web site. This means that you are registered only with the FTC's research team for the FTC or FICO, as explained above.

7. What are your rights under the Privacy Act of 1974 concerning this information?

The Privacy Act of 1974 protects information about individuals maintained in U.S. Government systems of records that are retrieved by the name of an individual or other personal identifier (e.g., Social Security number). As explained earlier, the FTC does not intend to make any of the information collected by this Web site a part of any FTC agency records covered by the Privacy Act. The FTC's research team will maintain and use this information under contract for purposes of the study. If the information is treated as part of the agency's records, it would be protected as part of the FTC's legal records system, and you would have a right to make a formal, written request under that Act to ask the FTC for the opportunity to review your records for accuracy or any other reason. If you believe your registration information is incorrect or out-of-date during the course of this study, you do not need to make a formal written request under the Privacy Act. You may simply communicate the new information to the FTC's research team at <u>busresc2@umsl.edu</u>.

Thank you for reviewing this privacy policy. If you have any questions about it, or about the FTC's study, please contact the FTC study coordinator, Peter Vander Nat, Ph.D., FTC Bureau of Economics, at <u>pvandernat@ftc.gov</u>.