

# LocateSmarter End User GLBA Information

The consumer data transmitted through the LocateSmarter platform may be subject to the Gramm-Leach-Bliley Act (GLBA). This document is provided to you to ensure your understanding of your responsibilities as the End User of GLB data.

The Gramm-Leach-Bliley Act, as passed in 1999 and enforced in 2001, requires financial institutions to limit their practices of sharing customer information to safeguard sensitive data. Financial companies include institutions that offer consumers financial products or securities like loans; financial, or investment advice; or insurance.

The Gramm-Leach-Bliley Act mandates confidentiality of consumer non-public data. Many financial institutions report consumer information to credit bureaus and other institution in the course of their business operations. When consumer location information is included in these updates, it can be sold to other entities in the form of consumer reports. Those types of companies who can obtain the consumer reports are listed in the GLB as “exceptions”.

GLBA Exceptions are as follows:

- To protect against or prevent actual or potential fraud, unauthorized transactions, claims, or other liability.
- For required institutional risk control or for resolving consumer disputes or inquiries.
- To persons holding a legal or beneficial interest relating to the consumer
- To persons acting in a fiduciary or representative capacity on behalf of the consumer.
- To comply with Federal, State or local laws, rules and other applicable require.
- In accordance with 16 CFR Part 313.14 as necessary to effect, administer, or enforce a transaction that a consumer requests or authorizes. This is the exception that allows you to skip trace for collections purposes.

An example of Gramm-Leach-Bliley regulated non public, personal information would be: name, address, phone number, social security number, and date of birth.

LocateSmarter’s verification process is put in place to verify that each End User accessing GLBA data has an approved permissible purpose.