(#215) Dear Management:

January 3, 2020



Reg Flag rules have been around for some time now... to create policies and procedures to prevent/detect identity theft, etc.  
  
And as time has gone by... more and EASIER access to borrower information has occurred... through the continued technology takeover of our industry... to the various and multiple vendors dipping their hands into our borrower data points, etc.  
  
Have your control procedures kept up... to match these changes?  
  
Don't know?    
  
Well you should... and you might want to take a re-visit...  
  
Because the fines/penalties and remediation costs are bad enough...  
  
BUT there it's nothing worse than your company's name in a banner headline denoting a borrower's data breach.  
  
  
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