



Protecting Client Personal Information

A Business Imperative

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Businesses Collect and Store Client Personal Information (“CPI”)

- Name and Address
- Credit Card Number
- Driver License Number
- Bank Routing Numbers
- Tax ID (SSN/TIN)
- Credit Applications
- Personal Identification
- E-mail/website Info.
- Bank Accounts
- Shipping Info.
- Date of Birth
- Immigration ID

Identity Theft is Growing 20% annually and is rooted in CPI

- Protection of Personal Information is Good Business and *a business imperative*
- Federal requirements mandate documented procedures by businesses, financial institutions, auto dealers, utilities, non-profits (that offer extended payment terms)
- “Red Flags Rule” effective 12/31/2010 – enforced by the Federal Trade Commission and State Attorneys General
- Federal Penalties for non-compliance - \$3,500-\$16,000/account, plus
- Uncontrollable Impact to Businesses – immeasurable costs to company reputation, loss of business, civil litigation, repair of client credit, distraction and compliance programs.

Timely Action Protects CPI and Meets Regulatory Requirements

- Risk-based Assessment of all business processes where CPI resides, e.g., account establishment, credit evaluation, fulfillment, billing, receivables, maintenance, IT systems
- Formalization and documentation of business practices that:
 - Collect, handle, store and protect CPI
 - Monitor and identify suspected improper or dishonest CPI (“red flags”)
 - Respond to potentially dishonest changes to or use of CPI
- Employee training and operations review to assure performance integrity
- Regular re-assessment, update and retraining
- Methods and procedures formally approved by owner or board director

Independent Review Services by *Integrated Risk Management Solutions, LLC*

- On-site Assessment – Independent professional review of all business processes
 - One work day with client pre-preparation
 - \$1,000 fee plus travel
 - Produces written report of processes needing documentation and training
- Guided Assessment – Business owner conducts review of business process
 - Consultation provided by independent professional (2-3 hours)
 - On-site review by owner utilizing Guided Evaluation form
 - \$500 fee plus travel or remote communication expenses
- Full On-site Assessment, Procedure Development, Training and Follow-up
 - Custom services
 - Fees TBD
- Full Deployment Support and Follow-up Review Services Available