

Origination of WEB Entries (Internet-Initiated/Mobile)

- ◆ Debit WEB entries - Company will obtain authorization for WEB entries in accordance with the Rules and U.S. law. The Company will retain a record of the authorization for period of two years from the Settlement Date of the WEB entry.
 - Must be written, signed, or similarly authenticated
 - Must be readily identifiable as an ACH Debit authorization
 - Clearly and Conspicuously state its terms
 - Provide a method for revoking authorization (for recurring transactions or single entry transactions scheduled in advance)
 - Consumer must be prompted to print or be provided with a hard copy upon request
- ◆ Company will employ a commercially reasonable procedure to verify routing numbers.
- ◆ **Company will employ commercially reasonable methods of authentication to verify the identity of the Receiver.**
- ◆ Company will employ a commercially reasonable fraudulent transaction detection system.
- ◆ Credit WEB entries – A credit entry initiated on or behalf of the holder of a Consumer Account that is intended for a Consumer Account of a Receiver, regardless of whether the authorization is communicated via the Internet or Wireless Network.
- ◆ Company will establish a secure Internet session with each Receiver utilizing a commercially reasonable security technology providing a level of security that, at a minimum, is equivalent to 128-bit encryption technology prior to the Receiver’s key entry of any banking information, including but not limited to, the Receiver’s financial institution routing number, account number, and PIN number or other identification symbol.
- ◆ Company will conduct an annual audit to ensure that the financial information it obtains from Receiver’s is protected by security practices and procedures that include, at a minimum, adequate levels of (1) physical security to protect against theft, tampering or damage; (2) personnel and access controls to protect against unauthorized access and use; (3) network security to ensure secure capture.