

# California Investigative Consumer Reporting Agencies Act Policy

For purposes of this California Investigative Consumer Reporting Agencies Act Policy, the following terms have the means set forth below:

- "Consumer" means the applicant for housing leveraging the VERO platform to apply and who is the subject of an investigative consumer report leveraged for that purpose.
- "Customer" means the company or entity leveraging the VERO platform to collect applications from Consumer for the purpose of hiring a dwelling unit.
- "EBD" means Experian Background Data, Inc.
- "FCRA" means federal Fair Credit Reporting Act, 15 U.S.C. 1681 et seq., as amended.
- "ICRAA" means California Investigative Consumer Reporting Agencies Act, California Civil Code §1786, et seq.
- "Investigative Consumer Report" means an Investigative Consumer Report as defined under ICRAA.

1. If an Investigative Consumer Report is sought in connection with the hiring of a dwelling unit (i.e., tenant screening), as defined in California Civil Code §1940, subdivision (c), VERO, not later than three days after the date on which the Investigative Consumer Report was first requested, will notify the Consumer in writing that an Investigative Consumer Report will be made regarding the Consumer's character, general reputation, personal characteristics, and mode of living. The notification includes, at minimum, the name and address of the investigative Consumer reporting agency that will prepare the Investigative Consumer Report and a summary of the provisions of California Civil Code §1786.22. Specifically, with respect to Investigative Consumer Reports provided by EBD, VERO will use the contact information provided to it by EBD.
2. VERO, prior to requesting an Investigative Consumer Report from EBD, has made the applicable disclosures to the Consumer as required above and in California Civil Code §1786.16, subdivision (a), and shall comply with California Civil Code §1786.16, subdivision (b), as applicable.
3. VERO shall provide a copy of the Investigative Consumer Report to the subject of the investigation, as provided in California Civil Code §1786.16, subdivision (b).
4. VERO shall:
  - a. Provide the Consumer a means by which the Consumer may indicate on a written form, by means of a box to check, that the Consumer wishes to receive a copy of any Investigative Consumer Report that is prepared. If the Consumer wishes to receive a copy of the Investigative Consumer Report, VERO provides instant authorized, authenticated access to a copy of the Investigative Consumer Report to the Consumer within

three business days of the date that the Investigative Consumer Report is provided to VERO by EBD. The notice to request the Investigative Consumer Report may be contained on either the disclosure form, as required by subdivision (a), or a separate consent form. The copy of the Investigative Consumer Report shall contain the name, address, and telephone number of EBD as the issuer of the Investigative Consumer Report and how to contact EBD with respect to Investigative Consumer Reports, EBD shall provide VERO its contact information;

- b. Comply with California Civil Code §1786.40, if Customer takes adverse action against the Consumer through the VERO platform for which the Investigative Consumer Report relates. Specifically, VERO acknowledges and agrees to provide to Consumers for whom an Investigative Consumer Report is provided, and in the adverse action cases, to include the contact information for EBD as provided by EBD to VERO;

5. The contact information for EBD is below:

**Experian Background Data, Inc.**

**PO Box 1458**

**Allen, TX 75013**

**Toll Free number - (833) 256-3148**