

Commercial Card OFAC Sanctions Screening

Frequently Asked Questions

The frequently asked questions (FAQs) below are intended to provide program administrators with additional details and clarity into why specific information is required from applicants.

QUESTION	ANSWER
1. What is OFAC?	The Office of Foreign Assets Control (OFAC) administers and enforces economic sanctions programs primarily against countries and groups of individuals, such as terrorists and narcotics traffickers. The sanctions can either be comprehensive or selective.
2. Why are we asking for this information?	OFAC rules generally require that U.S. persons (all persons and entities within the U.S., all U.S. incorporated entities and their foreign branches) are prohibited from transacting with persons on a government sanctions list. As a U.S. entity and a regulated financial institution, we are required to ensure that individuals who are listed on a government sanctions list do not use our products.
3. What method are we using to ensure that our products and services are not being offered to individuals who are on a government sanctions list?	<p>Commercial Card performs sanction screening of all commercial card applicants to ensure compliance with these regulations. While OFAC does not expressly state what information is required in order to comply with government regulations, we have determined that collecting private information such as name, home address and date of birth enables us to perform more effective sanction screening.</p> <p>We require these fields to be accurately completed on all individual card applications. We recognize that this is private data and confirm that it will only be used to issue and service corporate cards under a client's program.</p>
4. What data does Commercial Card require for applicants?	<p>We collect the following data from applicants to facilitate the screening process:</p> <p>U.S. Applications:</p> <ul style="list-style-type: none">• Legal name of applicant• Applicant's home address• Applicant's date of birth <p>Canada Applications:</p> <ul style="list-style-type: none">• Legal name of applicant• Applicant's home address• Applicant's date of birth• Privacy disclosure <p>In order to comply with our legal obligations, we require this information to effectively screen against sanction lists. If applicants do not supply the requested data, we cannot process the application.</p> <p>In addition, program administrators are required to certify that the:</p> <ul style="list-style-type: none">• Information provided is accurate• Applicants are employees of the client• Applicants requested the issuance of the cards in their names

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QUESTION	ANSWER
<p>5. What if applicants do not want to provide the requested information?</p>	<p>We require this information to effectively screen against sanction lists in order to comply with our legal obligations. If the applicant does not supply the requested data, then we cannot process the application.</p>
<p>6. Are the security access codes used for OFAC screening?</p>	<p>We require this information to effectively screen against sanction lists in order to comply with our legal obligations. If the applicant does not supply the requested data, then we cannot process the application.</p>
<p>7. What security access codes (i.e. last four digits of the SSN / SIN, mother's maiden name, etc.) on the applications are required rather than optional?</p>	<p>Collecting this information allows us to authenticate a cardholder's identity when they contact us for account activation or servicing. As part of this authentication process, two security identifiers are required for each account.</p> <p>For individual accounts, the identifiers may include:</p> <ul style="list-style-type: none"> • The last four digits of the cardholder's social security number or any other unique four digit password • The first four letters of the cardholder's mother's maiden name or any other unique four digit and/or letter password <p>For department accounts, the identifiers may include:</p> <ul style="list-style-type: none"> • Any unique four digit password • Any unique four digits and/or letters
<p>8. Will we ever require an applicant's social security number for OFAC screening? Is the application SSN used in our screening?</p>	<p>A social security number (SSN) is not part of the required information and is not needed for sanctions screening. However, Federal Card will continue to require each applicant's SSN.</p>
<p>9. Why are the OFAC-related personal information fields not required on the department applications?</p>	<p>Department cards are used by an organization to capture expenses such as telecom, supplies or travel on behalf of multiple individuals. Because department cards are designed for this purpose, we determined it would be more feasible to conduct the screening at the organizational level rather than at the individual level.</p>