

IDENTITY THEFT PREVENTION POLICY

I. OBJECTIVE

To prevent and mitigate identity theft of GVEA members.

II. POLICY

- A. It will be the policy of GVEA to annually review and maintain an Identity Theft Prevention Program that will identify, detect, mitigate, and update Red Flags that signal the possibility of identity theft in connection with the opening of a covered account or any existing covered account in compliance with the Fair Credit Reporting Act, as amended by the Fair and Accurate Credit Transactions Act of 2003.
- B. As part of an Identity Theft Prevention Program, GVEA management will develop operational procedures that incorporate existing GVEA policies, establish appropriate Red Flags, and promote proper detection of Red Flags.

III. RESPONSIBILITIES

- A. The President & CEO or designated officer will be responsible for the development and annual review of an Identity Theft Prevention Program at GVEA.
- B. Each Vice President, as applicable, will be responsible for the development and annual review of all operational procedures within their Division.

ADOPTED: October 27, 2008

AMENDED: March 27, 2017