# Fair Credit Reporting Act

# Purpose

The Fair Credit Reporting Act (FCRA) regulates both the providers and users of consumer credit information and of consumer reporting agencies. The stated purpose of the FCRA is to require accurate information when providing consumer credit reports.

# Policy Statement

It is the policy of Rewarding HealthyHabits, LLC dba HealthyHabits not to use consumer credit reports in connection with credit transactions involving members, for any authorized purpose outlined in the FCRA.

Unauthorized use of consumer credit reports or the disclosure of a member’s financial information by an officer or employee of Rewarding HealthyHabits, LLC dba HealthyHabits outside the scope of this policy may be grounds for disciplinary action, including dismissal.

# Prescreening Solicitation

The member received the offer because he/she satisfied the criteria under which the member was selected for the offer.

If applicable, the credit may not be extended, if after the member responds to the offer, the member does not meet the criteria used to select the member for the offer or any applicable criteria bearing on credit worthiness or does not furnish any required collateral.

The member has a right to prohibit information in the member's file from being used in connection with credit transactions that are not initiated by the member\*

The definition has been expanded to include:

* denying or closing of an account (checking, savings, or other similar accounts)
* denying, suspending, or closing of an electronic funds transfer service; and
* freezing an account.

# Requirements for HealthyHabits Member/Applicant

Rewarding HealthyHabits, LLC dba HealthyHabits uses a proprietary ability to repay questionnaire to evaluate member applicants for line of credit limits. Rewarding HealthyHabits, LLC dba HealthyHabits discloses to a member/applicant that it does not use information obtained from a credit report or a credit reporting agency.

# Medical Information on a Credit Application

# HealthyHabits does not collect medical information on a credit application, the process for making the credit decision or eligibility will be as all other considerations. This would include debts, expenses, income, benefits, assets, collateral, and the purpose of the line of credit. A member’s physical, mental, or behavioral health, condition, history, type of treatment, or prognosis will not be considered when line of credit limit decision is made.