Credit Bureau Direct Dispute Procedures

Updated July 23, 2014

Qualstar will comply with the requirements of Section 312 of the Fair and Accurate Credit Transactions (FACT) Act.

Investigation of Disputes

Qualstar's Member Solutions department will conduct a reasonable investigation of a direct dispute when it relates to:

- The member's liability for a credit account or other debt with Qualstar, such as direct disputes relating to whether there is or has been identity theft or fraud against the member, whether there is individual or joint liability on an account, or whether the member is an authorized user of a credit account;
- The terms of a credit account or other debt with Qualstar, such as a direct dispute relating to the type of account, principal balance, scheduled payment amount on an account, or the amount of the credit limit on an open-end account.
- The member's performance or other conduct concerning an account or other relationship, such as direct disputes relating to the current payment status, high balance, date a payment was made, the amount of a payment made, or the date an account was opened or closed; or
- Any other information contained in a consumer report regarding an account or other relationship that bears on the member's creditworthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living.

Exempt Disputes

The requirement to conduct a reasonable investigation does *not* apply if the member is disputing:

- Identifying information, such as name, date of birth, Social Security number, telephone number or address;
- The identity of the member's past or present employers;
- Inquiries or requests for a consumer report;
- Information derived from public records, such as judgments, bankruptcies, liens, and other legal matters, unless the information was provided to the CRA by Qualstar;
- Information related to fraud alerts or active duty alerts; or
- Information provided to a CRA by another furnisher.

Whenever such an inquiry or dispute is received, we will contact the member promptly to assist in providing the requested information, or when appropriate, to direct the member to the CRA, other furnisher, etc.

Qualstar is also *not* required to conduct a reasonable investigation when we have a reasonable belief that the direct dispute originates from a "credit repair organization" (CRO). This exemption applies to any dispute:

- Submitted to the credit union by a CRO
- Prepared on behalf of the member by a CRO, or
- Submitted by the member on a form supplied to the member by a CRO

CRO's are businesses subject to the Federal Credit Repair Organizations Act (CROA). By definition, a CRO is a person who offers a service, in return for payment from the consumer that has the express or implied purpose of improving, or providing advice or assistance to the consumer to improve the consumer's credit record, credit history, or credit rating. The definition of a CRO excludes non-profit organizations, and any creditor or financial institution that is assisting the consumer with restructuring a debt owed to that creditor or financial institution.

Direct Dispute Address

Qualstar will investigate a direct dispute only if a member submits a dispute notice to the credit union in writing at:

- Qualstar's mailing address as it is reported on the member's credit report; or
- Qualstar's mailing address or e-mail address as it is disclosed on a member periodic statements, account opening documents and disclosures, Qualstar's website and any other Qualstar correspondence.

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Direct Dispute Notice Contents

A member's dispute notice must include sufficient information to identify the account or other relationship that is in dispute, such as an account number and the member's name, address, etc.

Necessary information:

- Member name
- Member SSN
- Member date of birth
- Member account number
- Member loan/share number
- Current reporting status
- Why they feel the information is incorrect
- Proof that the information is incorrect (i.e. police report, fraud or identity theft affidavit, court order, account statements)
- Copy of the relevant portion of the consumer report that contains the allegedly inaccurate information.

Investigation and Notification

After receiving a dispute notice from a member, Member Solutions will:

- Conduct a reasonable investigation with respect to the disputed information
- Review all relevant information provided by the consumer with the dispute notice
- Complete an investigation of the dispute and report the results of the investigation to the member within 30 days of receiving the dispute notice. If additional information is received during the 30-day investigation period, Member Solutions may then extend the investigation period for an additional 15 days.
- If the investigation finds that the information reported was inaccurate, Member Solutions will promptly notify each CRA to which Qualstar provided inaccurate information of that determination and provide any correction through E-Oscar so that information provided to the CRA is correct and accurate.

The following codes are used to update an account that is being directly disputed:

X: Account in dispute reported by subscriber
Z: Account previously in dispute
P: Subscriber reports dispute resolved

Frivolous or Irrelevant Disputes

Qualstar is not required to investigate a direct dispute if we reasonable determine that the dispute is frivolous or irrelevant. A dispute qualifies as frivolous or irrelevant if:

- The member did not provide sufficient information to investigate the disputed information as required above;
- The direct dispute is substantially the same as a dispute previously submitted by or on behalf of the member, either directly to the credit union or through a CRA, and Qualstar has already satisfied its requirements to investigate the dispute; or
- The dispute is exempt based on one or more of the reasons listed above.

If Qualstar determines that a dispute is frivolous or irrelevant, Member Solutions will notify the member of the determination not later than five business days after making the determination by mail or any other means previously consented to by the member. The notice will state the reasons for such determination and identify any information required to investigate the disputed information.

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Member initiated correction request through a credit bureau (E-Oscar System):

On a member initiated correction request, the credit bureau will submit a request for validation or correction to Qualstar through the E-Oscar system. Qualstar's Member Solutions department is legally obligated to investigate and answer requests for validation or correction within 30 days of receipt of the request, though we do attempt to investigate them within 10 days.

Qualstar Credit Union Contact Information:
Member Solutions – **425-460-3910**
PO Box 3050 Bothell, WA 98041-3050

Credit Bureau Contact Information:

Equifax

PO Box 740256
Atlanta, GA 30374
1-800-685-1111
www.equifax.com
To Report Fraud: 1-888-766-0008
To Update Fraud Information: 1-866-222-5880

Fees*

- Fees vary check with Equifax
- If you have been denied credit within the last 60 days, the report is free.

To dispute information on credit report:

- Submit online dispute at: www.equifax.com
- Call agency at above phone number

Experian

PO Box 2104
Allen, TX 75013-2104
1-888-EXPERIAN (1-888-397-3742)
www.experian.com
To Report Fraud: 1-888-397-3742
1-800-301-7196 (fax)

Fees*

- Fees vary check with Experian
- If you have been denied credit within the last 60 days, the report is free.

To dispute information on credit report:

- Submit online dispute at: www.experian.com
- Call agency at above phone number

Provide Required Information:

- Full Name [1]
- Social Security Number
- Date of birth
- Current & previous addresses the last 5 years
- Signature [2]
- Copy of driver's license, utility, or phone bill

TransUnion

PO Box 2000
Chester, PA 19022
1-800-916-8800
www.transunion.com
To Report Fraud: 1-800-680-7289

Fees*

- Fees vary check with Trans Union
- If you have been denied credit within the last 60 days, the report is free.

To dispute information on credit report:

- Submit online dispute at: www.transunion.com
- Call agency at above phone number

Provide Required Information:

- Full Name [1]
- Social Security Number

Free Credit Report | AnnualCreditReport.com

PO Box 105281
Atlanta, GA 30348-5281
1-877-322-8228
www.annualcreditreport.com

Fees

- Free one time per year
- MUST USE OFFICIAL FORM available from www.annualcreditreport.com (Annual Credit
- Report Request Form)

Required Information:

- Full Name (include Jr. or Sr.) [1]
- Social Security Number
- Date of birth
- Current & previous addresses

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TransUnion, continued • Date of birth • Current & previous addresses the last 2 years • Current employer • Phone number • Signature [2]	

*Credit report prices are subject to change and prices vary depending on state of residency. If requesting a joint report, cost will be double the amount of an individual report.

[1] It is important to include all required information to ensure that a complete report is sent.

[2] Include spouse's full name and signature when requesting joint information.