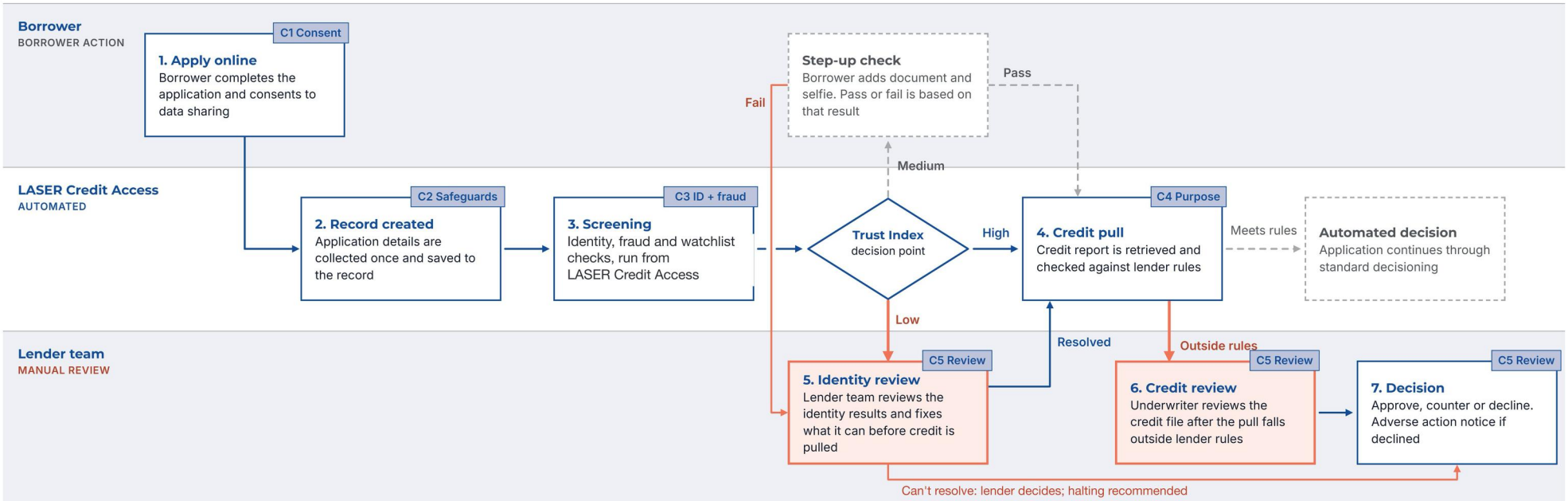
From online application to human review: compliance view

Same scenario with five compliance checkpoints marked on the steps where they apply. Recommended workflow: identity review comes before any credit pull.

Main path: application, IDV and Monitor pass | Exception paths | Alternate paths: automated decision, step-up check | C1 Consent Compliance checkpoint tied to this step



Compliance checkpoints

C1 Consent

Consent and notices
Borrower authorizes the credit report and the sharing of data with the ID verification provider. Consent form links to the lender's privacy page.

C2 Safeguards

Data safeguards and records
The GLBA Safeguards Rule covers borrower personal information, including data sent to service providers. Results and decisions are kept in the audit trail. Retention is set by the lender; timed deletion is configurable.

C3 ID + fraud

Identity, fraud and watchlist screening
Identity is verified and screened for fraud and watchlist hits, typically before credit is pulled, to support KYC and AML compliance where applicable. Trust Index bands: high continues, medium steps up to document and selfie, low goes to identity review. Thresholds are set by the lender. If identity cannot be resolved, the lender decides whether to proceed; halting before the credit pull is recommended.

C4 Purpose

Credit pull: permissible purpose and legal basis
Pull only with a valid permissible purpose and documented borrower consent for this application. Each inquiry is logged.

C5 Review

Review and adverse action
Written review criteria applied consistently, with fixes and overrides logged. If declined, the adverse action notice states reasons (Reg B, FCRA).

Checkpoints are general reference points, not legal advice. Each lender confirms its requirements, including retention periods, with its own compliance counsel.

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