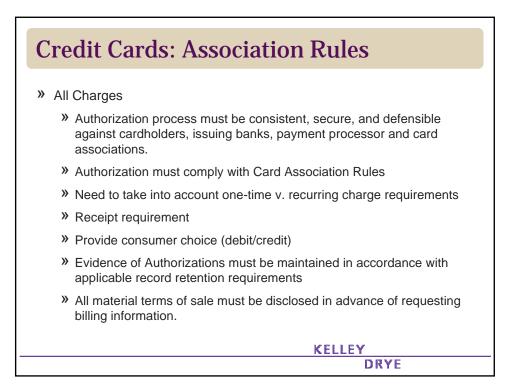
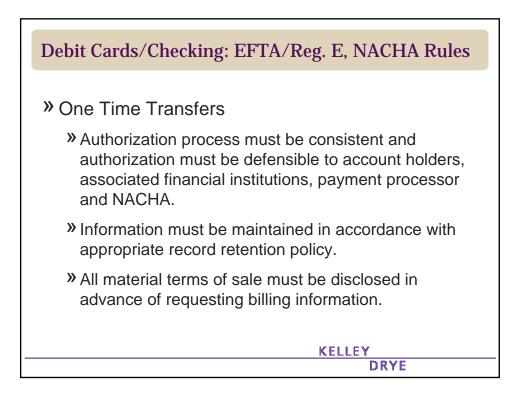
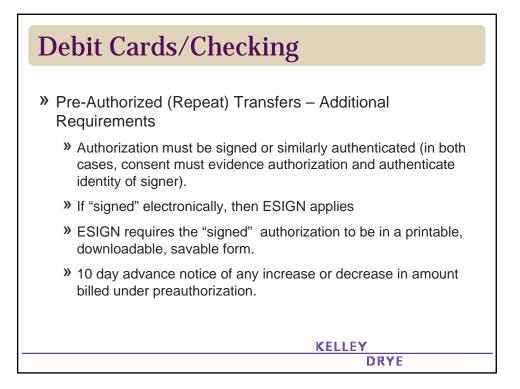
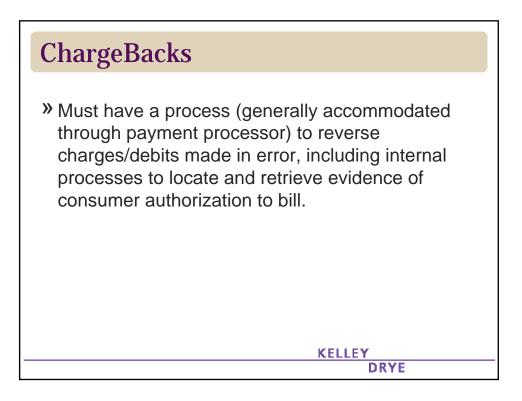


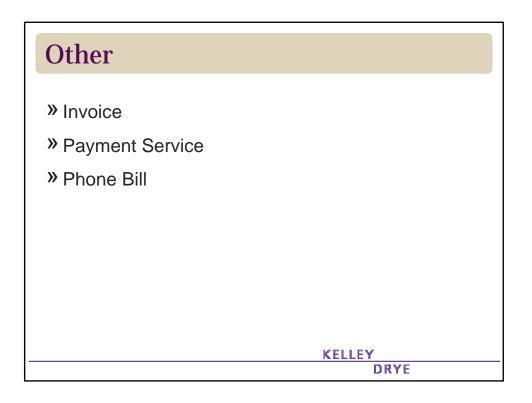
Applicable Law	
Charge (Credit Cards)	Electronics Fund Transfer (Debit Cards, Checking Accounts)
» Federal Law	» Federal Law
Truth in Lending Act, Regulation Z	» Electronic Funds Transfer Act, Regulation E, ESIGN
» Association Rules	» Association Rules
» Card Association Rules (Visa, MasterCard, Am. Ex. etc.)	» National Automated Clearing House Association "NACHA" Rules
Agen	icy Orders
FTC C	onsent Decrees (?)
State Attorneys General	Letter of Voluntary Compliance (?)
	KELLEY
	DRYE



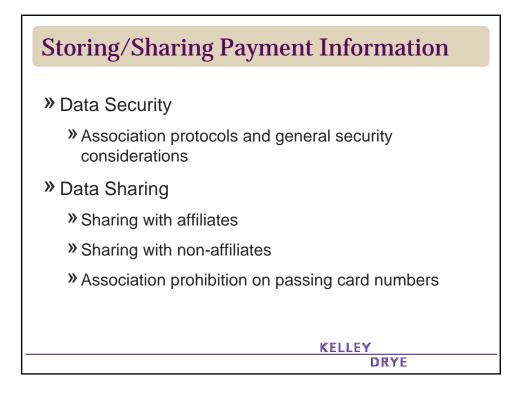


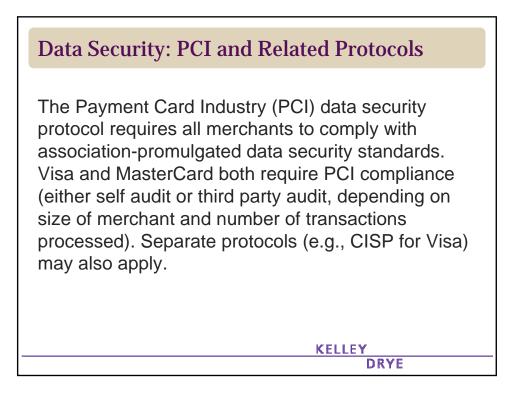


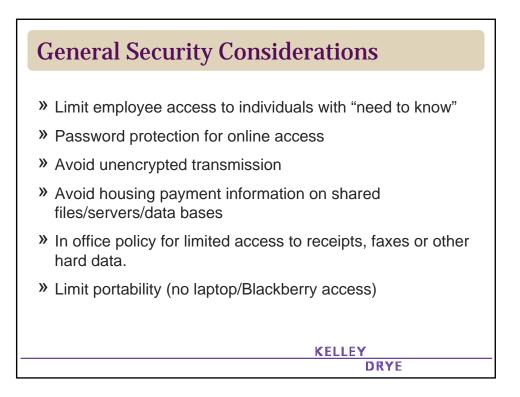




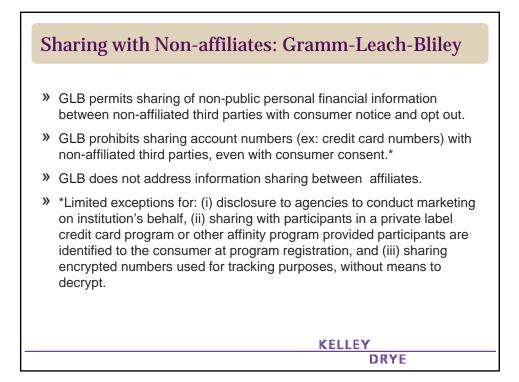


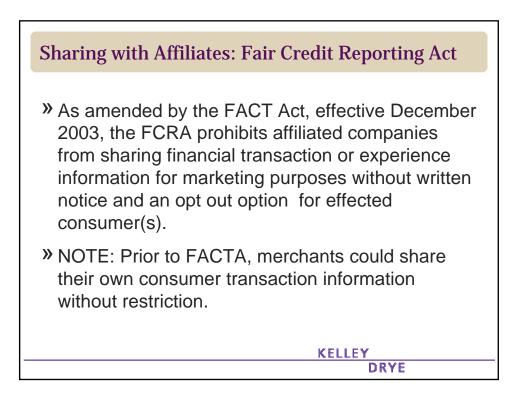


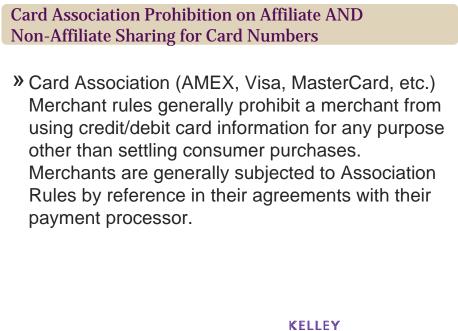


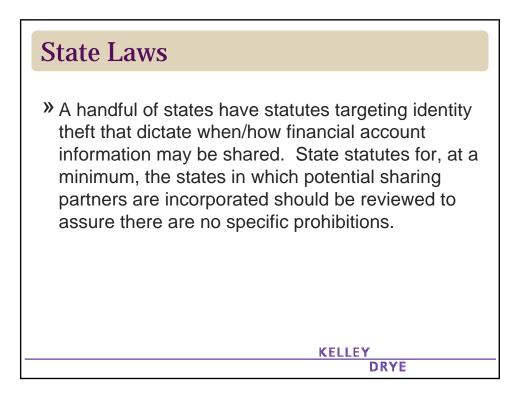


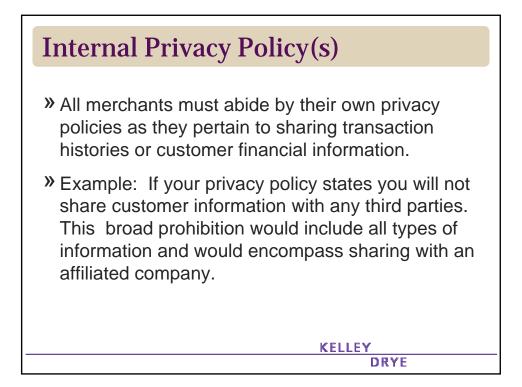


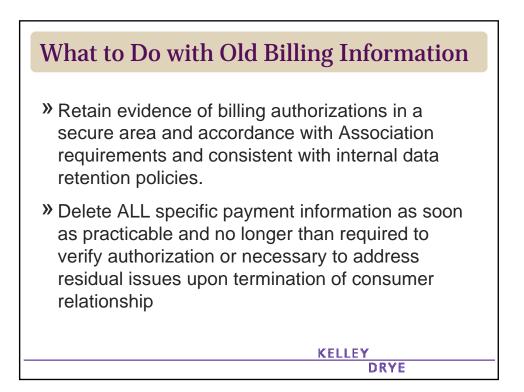












Top 10 Questions to Ask

- » Who is selling the product service (merchant of record)?
- » Who is obtaining billing authorization?
- > What billing methods accepted (Invoice only, credit card only, credit/debit, credit/debit/checking?) and with proper authorization?
- » What's the nature of the billing relationship (single credit/debit, recurring billing)
- » Who is settling transactions?
- > Are all relationships (billing agent, processor, vendor) properly documented to reflect roles of parties and parties' data security obligations?
- » Where is data being collected/stored data security controls?
- » Who has access to data?
- Do you anticipate affiliate or non-affiliate data-sharing, and if so, does sale incorporate required opt-in/opt-out notices?
- » Where does the payment information go after sale or the end of the relationship?

KELLEY DRYE

