

1       **1. Company Management and Customer Redress**

- 2           a. The organization will regularly review its information practices for process  
3           improvement opportunities and compliance.
- 4           b. The organization will take action to meet legal mandates and ensure when  
5           necessary appropriate privacy practices.
- 6           c. The organization will provide a simple, efficient, and effective means for  
7           addressing individual customer concerns. This process will be easily  
8           accessible to the customers and provide timely review, investigation,  
9           documentation, and, resolution of the customer’s concern.
- 10          d. On all issues above, the organization will follow existing procedures  
11          established or approved by the Applicable Regulatory Authority or  
12          Governing Documents, if any. Meeting such applicable procedures will be  
13          sufficient to demonstrate compliance with, or under, the VCC.