Customer Identification Program (CIP)
Customer Identification Program (CIP)

Due to the USA Patriot Act, all banks are required by federal regulation to implement Customer Identification Programs (CIPs) to prevent financing of terrorist operations and money laundering. This document provides information about HSA Bank’s CIP process and the steps taken to ensure HSA Bank is able to verify customer’s identity.

The following information is required and collected by HSA Bank for our Customer Identification Program (CIP):

• First Name
• Last Name
• Residential Address
• Date of Birth
• Social Security Number
• Home or Business Phone

The information above is used to validate the accountholder’s identity and will be sent to HSA Bank’s vendor to validate against their data system. The accountholder passes the CIP process when certain combinations of the information above match.
Customer Identification Program (CIP)

There are various ratings that an accountholder may receive. The rating will be determined by the reason why the CIP process was failed. The rating may result in account closure if not resolved within 60 days.

The following is a list of scenarios which may prevent an individual from passing the CIP process*

- Name matches OFAC registry listing
- SSN was issued prior to date of birth
- SSN registered as deceased
- Day, year or month of birth does not coincide with SSN
- SSN does not coincide with name and address
- State of Nevada does not provide SSN listings for credit/ID verifications

*This list is not comprehensive but is provided to you as an example of the types of possible scenarios.
Requirements

CIP for the accountholder will be performed at time of enrollment.

During the application process, we may be required to collect additional forms of identification from accountholders. We will notify them up to three times by mail or phone. The communication plan and valid forms of identification we accept can be found on pages 5 and 6 of this document.

Accounts will remain open and fully functional while we attempt identity verification.*

HSA Bank may close out the account if the accountholder is unable to supply the proper forms of identification within 60 days of the account opening. All remaining funds will be returned to the accountholder. Tax reporting will be conducted for the period of time the account was open. If the accountholder wishes to establish another account, they will be required to resubmit a new application through the appropriate enrollment method and provide identification at that time.

* Accountholders providing SSNs that are registered as deceased will be opened in a restricted status until forms of identification are received and verified. Authorized signers on the account are also subject to deceased SSN restrictions and may not be added to the account until the forms of identification are verified.
CIP Follow-up Communications

HSA Bank will reach out to all accountholders that are required to submit additional forms of identification. Below is our communication plan.

<table>
<thead>
<tr>
<th>Timeframe after Enrollment</th>
<th>Letter</th>
<th>Phone Call</th>
</tr>
</thead>
<tbody>
<tr>
<td>4 days</td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>3 weeks</td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>5 weeks</td>
<td></td>
<td>x</td>
</tr>
</tbody>
</table>
Valid Forms of Identification

Accountholders must submit two unique forms of identification from the list below to HSA Bank within 60 days of notification.

<table>
<thead>
<tr>
<th>Valid US Driver's License</th>
<th>US Military ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Valid US Probationary Driver's License</td>
<td>Alien Registration Receipt Card</td>
</tr>
<tr>
<td>Valid US Learners Permit</td>
<td>Employment Authorization Card Form I-766</td>
</tr>
<tr>
<td>Valid US State Non-Driver ID Card</td>
<td>Permanent Resident Card</td>
</tr>
<tr>
<td>Valid US Passport</td>
<td>Temporary Resident Card</td>
</tr>
<tr>
<td>Valid US Passport Card</td>
<td>Green Card</td>
</tr>
<tr>
<td>Social Security Card</td>
<td>Non-Resident Alien Card</td>
</tr>
<tr>
<td>Social Security Letter</td>
<td>Immigrant or Non-Immigrant Visa</td>
</tr>
<tr>
<td>ITIN Card</td>
<td>Credit Card or Complete Credit Card Statement</td>
</tr>
<tr>
<td>ITIN Letter</td>
<td>Most Recent Property Tax Bill</td>
</tr>
</tbody>
</table>

Identification can be submitted to HSA Bank by using one of the following methods:

- Mail
- Fax - Please copy these forms at 200% before faxing
- Upload through secure website

*All documents must be legible*
For Assistance, Contact Business Relations:

Call (866) 357-5232
Monday through Friday,
7 a.m. - 7 p.m., CT

Email
businessrelations@hsabank.com

Visit
www.hsabank.com/employers