CC: _____

_____

We suggest ... the following document requests

1. For what phases of the insurance life cycle does the company employ data, directly or indirectly, on criminal history? Direct use means consideration of raw data on criminal justice system interactions. Indirect use means data sources or algorithms that utilize criminal history interactions in whole or in part. Provide a description of the criminal history data used by product type by state, whether raw data or third-party algorithm, the source of the data, when the data were purchased, and the life cycle phase (marketing, underwriting, pricing, claim settlement, anti-fraud) in which the data are used in a tabular format.

Questions:

Expand those questions to include phases of the insurance life cycle other than underwriting, an