

BELLA

loves me.

TABLE OF CONTENTS

1. [Website FAQs](#)
2. [Internal FAQs](#)
3. [Visa FAQs](#)
4. [Agent Scripts](#)
5. [Bella Culture](#)
6. [Discretionary Fund](#)
7. [Banking Services](#)
8. [Bella Soul](#)
9. [Bella Connection](#)
10. [Bella SLAs \(Service Level Agreements\)](#)
11. [Bella Agent Widget](#)
12. [Bella Troubleshooting / Ticketing](#)
13. [Security](#)
14. [Banking Compliance](#)
15. [Dictionary](#)
16. [Bella Contacts](#)

Website FAQs

Frequently Asked Questions

ONBOARDING

FLOWS/ONBOARDING SCREENSHOTS

Your QR code to activate isn't working.

Type Activate in the BELLA app

When will I get merch?

We're sending Merchandise to all founding members. Keep an eye on your email inbox in December!

What is Backup Withholding?

Self-employed individuals or small businesses can often receive payments for services from a business or individual who does not withhold tax at the time of payment.

In these situations, the IRS expects the individual receiving these payments to report and pay taxes on this income when filing their federal income tax return.

Though the organization or company does not withhold taxes at the time of payment, they do record the amount(s) paid to the individual or small business and provide this documentation to the individual or small business in the form of a W-2G or 1099.

In some situations, a business or bank may require you to provide your Taxpayer Identification Number (TIN) on a Form W-9 or similar. A TIN can be either your social security number (SSN), employer identification number (EIN), or individual taxpayer identification number (ITIN).

How does this affect my Bella application?

Currently, Bella cannot support accounts for individuals subject to backup withholding. Applicants who are subject to backup withholding will not be approved.

Does this apply to me?

Some examples of payments subject to backup withholding are independent contract work, rental income, or interest payments on investments (a full list of applicable payments can be found on the [IRS website](#)).

Often, if you are full-time or part-time employed by a company, that company will withhold your estimated tax payment from your regular payments based on your expected annual income from

their organization minus your reported, eligible deductions and this does not apply to you unless you have additional sources of income that do not withhold taxes.

If you perform work or receive payments without taxes withheld at the time of payment, you must report your earnings when filing your federal income tax return. You may become subject to backup withholding if you:

- Do not report your income on your federal income tax return
- Under report your income on your federal income tax return
- Report an incorrect TIN

BLINK

What is a Karma Account?

The Karma Account is BELLA's vision of putting the "Pay It Forward" mentality into action. It's a personal fund (up to \$20) used to surprise other BELLA members with gifts—that is, to cover costs* of things like a cup of coffee or a tank of gas, and completely out of the blue.

Example scenario: A BELLA member pays for a latte with their BELLA debit card, and gets a notification that their beverage has been paid for by the generosity of another BELLA member. This mysterious benefactor could be you, or anyone else who has set aside Karma Account funds.

Create your Karma account with the tap-to-type box in the BELLA app. There is no fee to open a Karma account.

*Karma Account transactions only work for full purchases—i.e. the complete cost of one item, up to the \$20 cap.

How can I fund my Karma Account?

You can fund your Karma Account by moving money from your checking account.

How much money should I have in my Karma account?

You may allocate as much as \$20, which will then be used to randomly help pay for other BELLA members' debit purchases.

Do I have to fund my account regularly?

No. There is no balance minimum required to maintain the account, and you may transfer funds from your checking account to your Karma account—up to \$20—as often as you'd like.

Will I receive a notification telling me who has received some of my Karma Account funds?

Yes. Once your Karma funds have been debited from your account, you will receive a notification indicating the recipient, and how much they received.

Can I move/withdraw money from my Karma account?

Any funds already debited from your Karma account cannot be reclaimed, but any funds not already debited may be transferred from your Karma account as needed.

Can I close my Karma account whenever I want?

Yes, and there are no closing fees.

Will closing my Karma account have an effect on my Checking account?

Yes. Your remaining Karma account balance will automatically go to your checking account upon closing.

Will I get money from people with Karma accounts, even if I don't have one?

Yes. All BELLA members may receive Karma funds from other members, regardless of whether they've set up a personal Karma account.

How does BELLA Surprise work?

BELLA Surprise is when we reward you cashback bonuses on normal purchases—out of the blue, and completely at random. BELLA members use their BELLA debit cards as per normal—everything from a small purchase like a cup of coffee to larger purchases like plane tickets—but on occasion will see they've received bonus cashback.

How much do you get with BELLA Surprise?

A BELLA Surprise is anywhere between 5% and 200% back* on any random purchase made using the BELLA debit card. The size of the purchase does not influence how high of a percentage of cashback you will receive—it's completely randomized, and that's part of the fun!

**Up to \$2,000*

Will BELLA Surprise work with any merchant?

Most, but not all. A small number of merchant categories—those associated with “vice” purchases and money transfers—will not be subject to surprise cashback.

For a detailed rundown of what qualifies for BELLA Surprise, please visit BELLA Surprise Terms at <https://www.BELLALoves.me/legal-area/?f=privacy>

Will I receive a notification when I get a BELLA Surprise?

Yes. You will receive a notification in the BELLA app.

Will BELLA Surprises go directly to my Checking account?

Yes.

Can I direct BELLA Surprises directly to my Savings account?

No, but we're exploring adding this option in the future.

What exactly does "Pay It Forward" mean?

Pay It Forward is the idea that you give something to someone without expecting anything in return. The recipient of your giving then *also* gives to someone else, again expecting nothing in return. In an ideal scenario, this pattern continues infinitely.

The Pay It Forward principle is the core tenet of the Karma Account, where you leave funds whose sole purpose is to make someone else's day. It feels great to give, but it also feels great to be the recipient of someone else's giving—something that's possible for each and every BELLA member, regardless of whether they have their own Karma. In short, you don't have to *give* to receive, but the more Karma funds there are, the greater chance there is that *your* day could be lifted by a random act of generosity.

What is the difference between Pay It Forward and the Karma Account?

"Pay It Forward" refers to a mentality—giving to others while expecting nothing in return—and the Karma Account is BELLA's tool for making the mentality a reality. You set aside money in your account, and this money helps others. As a BELLA member, you're always a potential recipient of someone paying it forward using the Karma Account, even if you haven't set up your own yet.

Can I surprise a random person on BELLA? Or only people I'm friends with on the app?

Pay It Forward occurrences are randomized and anonymous. So while you can't choose the recipient of your generosity, you can rest assured your funds are contributing to a collective goal of making the world a kinder, more giving place.

What is a Karma Score?

v2 - 11/30/2020

page 7

You may notice a “Karma Score” on our website, in the “Coming Soon” section. This is not a credit risk score—it’s an indicator of your positive impact on the world. It’s formulated using your Karma Account, the Pay It Forward occurrences of which you’ve been a part, and your participating in Community Investments initiatives.

How does the Emergency Fund work?

If you find yourself in an unexpected situation in which you require more money than what’s directly available in your BELLA account, you can contact our BELLA Squad by typing “Emergency Fund” into the tap-to-type box on the app, and then providing some information about your predicament.

If and when a member of the BELLA Squad approves your Emergency Fund request, they will work with you to establish the most effective way to distribute funds and help resolve your problem. The Emergency Fund is not a loan. It is a pool of funds available to the community to cover emergencies. Once you have dealt with your emergency, you can put the money you took out back into the pot, to help the next community member in need. This is not required, but for returning borrowed funds to the Emergency Fund, you will be rewarded Karma points.

What else does BELLA do for the community?

BELLA is working to establish programs to benefit the BELLA community and world at large with messages of beauty, love, and tenderness at their cores.

CARDS

What kind of cards do you issue?

When you sign up for an account, a dual-interface Visa Debit Card will be sent to your permanent residential address. This can be used to make purchases where Visa is accepted, and covers in-person, online and over-the-phone transactions. Your card may also be used to withdraw cash, and make other transactions at any ATM that accepts Visa.

What is a debit card?

A debit card is a payment method linked to your checking account. When you pay with your debit card, the funds are “debited” from your checking account. This account debit might occur very quickly, or take a number of days.

Debit cards do not permit spending more than the amount of funds you have in your checking account. If you attempt to make a payment greater than the amount you have in your account, it will not go through.

Debit cards do not impact your credit score. All BELLA checking account holders will automatically be mailed a debit card upon opening an account.

What is a dual-interface card?

Dual-interface cards are debit cards that support contactless payment *and* contact payments. BELLA's debit card has an EMV chip, a traditional magnetic strip for swiping, and tap-to-pay functionality. The EMV chip provides enhanced card security, reducing risk of fraud. (EMV stands for Europay, Mastercard and Visa. This is a global standard for cards equipped with computer chips and the technology used to authenticate chip-card transactions.)

When will I receive my debit card?

After your application is approved, please allow 7-10 business days for your card to arrive. Your debit card will be mailed to the residential address on your account—PO boxes may not be used. If you do not receive your card within 10 business days, please contact our BELLA Squad through the BELLA App.

How do I activate my debit card?

To activate your card, scan the QR code included in the package in which your card arrived, and then follow the prompts. You may also log into your BELLA App, type "activate" in the search feature to view instructions.

What do I do if my debit card is damaged?

If your card is not functioning properly or is damaged, contact the BELLA Squad by typing "help" in the BELLA App, and someone will assist you in ordering a replacement card.

What is the difference between freezing and blocking my debit card?

Freezing a debit card means placing a temporary hold on the card so that no new transactions can process. When you freeze your card, you eliminate the risk of someone else using it to make purchases, and you ensure no charges are processed until you unfreeze your card. You may freeze/unfreeze your card in the BELLA App.

Blocking a debit card means placing a lock on your card by reporting it lost or stolen. If you block your card, it cannot be reactivated, and you will need to order a new debit card*. You can do this by contacting the BELLA Squad.

*Fees may apply. Contact the BELLA Squad for more information.

How do I "unfreeze" my debit card?

Type “unfreeze” into the BELLA App, and follow the resulting instructions to unfreeze your debit card.

How do I set a PIN for my new debit card?

When activating your new debit card in the BELLA App, you will be asked to type a personalized four-digit PIN number.

For security purposes, we recommend not using sequenced numbers, four of the same number, the last four digits of your social security number, or birth dates.

Can I pay bills using my debit card and set automatic debits?

You can make both one-time and recurring payments using your debit card. Contact your service provider/merchant to set this up.

How do I set up scheduled and/or recurring payments? How do I cancel them?

You may contact your service provider/merchant directly to schedule, cancel, or change a one-time or recurring payment.

Can I use my debit card for online purchases?

Yes, you may use your debit card for online purchases.

Can I use my card at a retailer/merchant that does not have a chip-activated terminal?

Absolutely! If a merchant or ATM has not yet adopted chip technology, your transaction will be processed using the magnetic stripe.

Is there a difference between PIN and signature purchases?

No. Whether you use your PIN or are required to sign your name, you will be charged the same.

Traditionally, if a payment terminal asks you to select your payment type, and you select debit, you will be asked to authorize the payment using your PIN. If you select credit, you may be required to sign a receipt to authorize your purchase. A signature may not be required for certain transactions, such as those made on the internet, through mail order, and at pay-at-the-pump gas stations. That stated, options may differ depending on the merchant.

Will my debit card work if I am traveling outside the United States?

Yes, you will be able to use your debit card when traveling outside the US.

Can I use my debit card to withdraw money from an ATM?

v2 - 11/30/2020

page 10

Yes, you may use your debit card to withdraw money from any ATM that accepts VISA.

Is there a limit to how much I can withdraw from an ATM using my debit card?

Yes. You may withdraw a maximum of \$500 per day.

How do I increase or decrease the ATM cash withdrawal limit?

Limits are set by our bank partner, and we are unable to increase or decrease cash withdrawal amounts.

Are there any fees for requesting a replacement debit card?

There may be fees depending on the reason for a replacement:

Expired Card: No fee

Stolen or Fraud: No fee

Damaged or Lost: up to \$20*

*BELLA offers 1 free replacement card per year for Lost or Damaged cards. All subsequent replacements will be charged a fee.

Is there a fee for withdrawing cash from an ATM using my debit card?

BELLA does not charge ATM withdrawal fees, but some ATM providers may charge fees of their own. Currently, BELLA is covering the cost of ATM fees for members.

Are there any transaction fees for using my debit card?

Yes. Visa DPS, our card-processing partner, applies a 1% foreign exchange conversion charge. BELLA does not apply any additional charges, and does not share in this fee applied by Visa DPS.

What should I do if my debit card is lost or stolen?

No need for panic! If you lose your card, the first thing you should do is freeze the card using the BELLA app. If you find your card, simply unfreeze it in the app. If the card is officially lost, we recommend blocking your card in the BELLA app to prevent unauthorized use. You will then be able to request a replacement card using the BELLA app. When you receive your new debit card, activate it in the BELLA app and create a new PIN.

Where can I see my card transactions?

In the BELLA App, type “transactions” to view all of your transactions. You will also receive push notifications when a transaction is processed, unless you choose to deactivate them.

How do I change my debit card PIN?

v2 - 11/30/2020

page 11

You can manage your PIN in the “Me” section of the BELLA App.

What should I do if my debit card PIN is not working?

If your PIN is not working, try resetting it in the BELLA app. If that doesn't solve the problem, message the BELLA Squad in the app.

Why am I receiving a fraud alert on my account?

Your privacy and security are our top priority. If our fraud department identifies a potential threat, BELLA will place a temporary freeze on the card. This freeze can only be deactivated by contacting the BELLA Squad in response to the fraud alert email you received.

What should I do after receiving a fraud alert from BELLA?

If you receive an email alert or call about suspicious card activity, you will need to review the suspicious transaction or transactions and confirm whether they are fraudulent.

If you confirm that fraudulent activity has occurred, a Block will be put on your account, and BELLA will file a report.

If instead you confirm that you authorized the potentially-suspicious transaction, your account will be immediately released, and you may resume activity as normal.

How long do I have to wait for the transaction to go through after I have responded to the fraud alert?

There is no delay once the account is released, but the merchant will need to process the transaction again.

TRANSACTIONS / PAYMENTS

What do I do if I see an unauthorized transaction in my account summary?

If you do not recognize a checking or savings account transaction, please contact the BELLA Squad immediately, and they will be able to temporarily freeze your card.

What is the difference between signature and pin transactions?

PIN-based transactions require you to enter your PIN (Personal Identification Number) into the merchant keypad at the point of sale. Signature transactions require you to sign your name at the point of sale to process the transaction.

Why hasn't my debit card transaction been posted to my account summary? How long does it take?

BELLA has to wait for the merchant to submit a transaction before it can appear on your account summary as a withdrawal. This can take between 1 and 3 days after your purchase, but you may see the transaction as pending authorization for 3-5 business days.

It's important you track your account balance, pending card transactions, and scheduled bill payments to ensure you have adequate funds in your account to cover pending charges.

What is a debit card transaction authorization?

When you use your debit card to make a purchase, the merchant with whom you're conducting the transaction will request an approval—this is known as an authorization. An authorization confirms that your account is open and active, and has enough funds available to cover the purchase amount at the time of the request.

Some merchants may send an authorization request for a nominal amount, such as \$1, or an estimate of the actual purchase amount. The authorization hold amount reduces your available balance and will remain on the account up to 3-5 business days after your debit card is used.

When the final authorization is presented to BELLA, the actual purchase amount is deducted from your account.

What is a pending transaction?

A transaction is pending when the merchant has sent an authorization request to BELLA. Once the request has been resolved, the final transaction amount can be posted, and the transaction is no longer considered pending.

When will the actual purchase amount be posted to my account?

Generally, final transaction amounts will post within 3-5 business days of making a purchase.

What if my pending transaction is incorrect?

If you see an error on your pending transaction, wait for the final authorization to post. If the final authorization amount is incorrect, first contact the merchant directly. If you are not able to resolve the issue with the merchant, contact the BELLA Squad in the BELLA App.

When can I access funds after making a deposit?

If BELLA is required to pull funds from an outside account, those funds will be available 48 hours after receipt of said funds is confirmed. Funds from an incoming ACH/deposit made by an outside financial institution are made available immediately upon receipt.

Where can I view my transactions?

You may view all past transactions in the “Transaction History” section of the BELLA App. You may also download monthly statements from the “Me” section of the BELLA App.

Are there transaction limits for mobile deposit? Are there monthly limits?

The daily limit for a mobile check deposit is \$1,500. The monthly limit is \$25,000. There is no limit to the number of check deposits you can make.

What is the difference between Current Account Balance and Available Balance?

Account Balance refers to the total funds in your account, including funds that may be removed once pending transactions are finalized. Available Balance refers to the amount of funds remaining in your account after your pending transactions are finalized.

What is the maximum amount I can spend using my BELLA debit card?

You may spend up to \$3,000 per day using your debit card.

Can I pay another BELLA member?

Yes. Inbound and outbound ACH transfers up to \$3,000 may be conducted between BELLA members. There are no hold times on inbound transfers.

ACCOUNT CLOSING

How do I close my account?

You're welcome to close any of your accounts at any time. Please see below for details on how to close each type of account:

CHECKING: To close your checking account, send a message to the BELLA Squad in the BELLA app, and someone will assist you.

SAVINGS (Goal Savings and Interest-Bearing Savings): Type “close” in the tap-to-type box in the BELLA app, and follow the instructions to automatically close your accounts. Any remaining funds in your savings accounts will automatically be transferred to your checking account.

KARMA: You may close your Karma account on your accounts page, or simply type “close” in our tap-to-type box on the BELLA app, and follow the instructions to close your account.

What happens if I still have money in my account when I want to close it?

You will not be able to close your account until your funds are withdrawn.

Can I temporarily close my account?

No. Closing your account is a permanent action. If you decide to reopen an account with BELLA, you'll have to reapply.

Can BELLA close my account?

Yes. BELLA may close your account(s) if you breach terms, conditions, or policies, or if we suspect you of fraud or financial crime.

Will I be notified if BELLA closes my account?

Yes. BELLA will send you an email in the event we have decided to close your account.

What happens to my remaining balance if I close my savings account(s)?

Any money you have left in your savings account upon closure will be automatically transferred to your checking account.

Do I have to return my debit card if I close my BELLA account(s)?

No. Your debit card is yours to keep.

APPLICATION SUPPORT

Can I install the app on multiple devices?

No. Use of the BELLA app is limited to one device per member.

Can I use the app offline?

No. For security reasons, app content is unavailable in offline mode. Internet connection is required for app use.

I'm having trouble receiving the verification code.

If you're having trouble receiving verification codes, try resending—there's a tap-to-resend option in the BELLA app. If the issue persists, please contact our Member Experience team using the BELLA app.

If for any reason you are locked out of the app, you may contact the Member Experience team via email at [EMAIL].

Why am I receiving a sign-in error? (403, VPA, Unexpected Error, Error Authenticating, et al)

BELLA is currently only supported in the United States. Attempting to download abroad often results in errors that we are currently unable to resolve.

SECURITY

How do you ensure online banking security?

To demonstrate security is BELLA's top priority, we employ multiple standard security measures and strive to adapt to the demands of an ever-changing banking service landscape. Traditional password protection software is available on the app, as is biometric security—fingerprint or face recognition, depending on your device's capabilities and your preferences. Beyond all this, BELLA guarantees personal identity information is only shared with our trusted partners—e.g. nbkc Bank—and only in circumstances necessary for you to legally make banking transactions through our service.

How do I identify and avoid potential scams?

There are many scenarios that could potentially trigger your red flag radar. If ever in doubt, contact a member of the BELLA Squad immediately for advice. Short of that, keep in mind the following:

-If anyone contacts you saying they have a warrant for your arrest, and that you owe some kind of "fine," this person is likely trying to scam you. If there is indeed a warrant for your arrest, you will not get a call ahead of time—the police will simply show up and confront you (which they can do, because they have a warrant).

-If anyone calls to inform you you're at risk of a security breach, but that they need full access to your computer, this is likely a scam. Do not, under any circumstance, provide passwords, PINs, or verification codes of any kind, to sources with which you're unfamiliar.

-If you receive an email from a source claiming connection to any of your external accounts, or even to your BELLA account, and prompts you to click on a link regarding a "security" issue, do not click said link—someone might be trying to get you to open a virus that would allow them access to your account.

-If you're contacted from someone claiming to have sent you money, and that they'd like you to purchase gift cards for them using the sent funds, be aware that this is 100% a scam. This scenario might seem uncommon, but it's not—and, unfortunately, it's hard to report this kind of activity as a scam. General rule of thumb: Don't believe someone when they've claimed to have

sent you money, especially if you're unfamiliar with the source, and even more so if there's a contingency involving you making purchases with the sent funds.

How would I access my BELLA account if I lost my mobile device?

When you sign up for a BELLA account, you provide BELLA with a contact email, which you can always use to get in touch with the BELLA Squad while you track down or replace your mobile device.

You may also use a tablet that supports IOS or Android to access your account.

BELLA is currently developing its website, which should be accessible via common web browsers, and available to users on computer desktops.

What should I do if I believe my identity has been compromised?

If you believe your identity has been stolen or compromised, you can contact major credit-reporting agencies about blacklisting/freezing your own social security number. If this is what you decide to do, you will be contacted about any future activity on your credit report—this ensures you're verifying whether activities related to your credit are your doing and not a potentially harmful external party.

If you plan to take out a credit application, you will need to unfreeze your account. You can reapply the freeze once your application is processed, or if you decide to terminate your application.

What should I do if I receive a suspicious email, SMS text or phone call regarding my BELLA account?

BELLA will only send communications using contact details you've directly provided to us, so if you receive correspondence via method you have not already explicitly provided us access, please contact our BELLA Squad.

How can I unlock my account?

Contact a member of the BELLA Squad via the app or the contact email you provided to unlock your account.

How can I engage an agent in an emergency situation?

Contact a member BELLA Squad via the app, or using the contact email you provided when you opened your BELLA account.

CHANGE OF INFORMATION

v2 - 11/30/2020

page 17

How do I change my address?

You can change your address in the “Me” section of the BELLA app. You will be prompted to submit documentation that verifies your new address. This may take a couple days to update in your account. If you need assistance, feel free to message the BELLA Squad in the BELLA app.

How can I change my email address?

You may change your email address in the “Me” section of the BELLA app. Once you’ve entered your new email address, BELLA will send a confirmation code to your new email address. You will need to enter the code in the app to save the change. If you need assistance, message the BELLA Squad in the BELLA app.

How do I change my name?

You can change your name in the “Me” section of the BELLA app. You will need to submit documentation that verifies your new name. This may take a couple days to update in your account. If you need help, message the BELLA Squad in the BELLA app.

How can I change my phone number?

You may change your phone number in the “Me” section of the BELLA app. Once you’ve entered your new mobile number, BELLA will send a confirmation code to your new number. You will need to enter the code in the app to save the change. If you need assistance, message the BELLA Squad in the BELLA app.

How do I set up my PIN?

When activating your new debit card in the BELLA app, you will be asked to type a 4-digit PIN number to use with your debit card.

How do I change my debit card PIN or request a new PIN?

You can change your PIN within the BELLA app.

How do I change my social security number?

You can change your social security number (SSN) in the “Me” section of the BELLA app. You will need to submit documentation that verifies your new SSN. This may take a couple days to update your account. If you need help, message the BELLA Squad in the BELLA App.

DECEASED ACCOUNT HOLDER

What happens to my account if I die?

v2 - 11/30/2020

page 18

In the unfortunate event you pass away, a family member or attorney may contact us. BELLA will gather necessary information from the caller, forward it to the Bank of Record, and someone from the bank of record will verify the identity of the person who has called on your behalf. Once proper verifications have occurred, the person calling on your behalf and the bank of record will work to disperse your funds appropriately (whether to beneficiaries or other appropriate parties).

Should a family member notify BELLA if I die?

Yes. A family member, friend, partner, or attorney should notify your banks in the event of your passing. Once BELLA receives notification of your passing, we will forward all information necessary to making sure your funds are transferred properly (to beneficiaries or other appropriate recipients) to the Bank of Record.

Can I choose a beneficiary for my account?

Yes. Contact a member of the BELLA Squad to set a beneficiary for your account, and they will make sure your banking system record is updated accordingly. You cannot set up a beneficiary in the app.

Will BELLA permit my beneficiary to withdraw money from my account or wire it to another account?

BELLA will not give your beneficiary direct access. Information kept with your Bank of/on Record will be used to properly verify your beneficiary's identity and send funds to them accordingly.

Can my beneficiary be in another country?

Sure. Where your beneficiary resides does not matter—the same procedures apply for acquiring funds from your account.

ONLINE/MOBILE BANKING SUPPORT

What do I need to enroll in online banking?

To create a BELLA account, you must provide your social security number, email address, and your residential address. You will also be required to e-sign an agreement with our partner nbkc.

Is online banking secure?

Yes. BELLA takes security very seriously and has made protecting your personal financial information our top priority.

How do I download the BELLA mobile app?

-Apple Devices: Open the App Store and search for "BELLA," and, once you find us, select "Get," then "Install" to download the app to your device.

-Android Devices: Open Google Play and search for "BELLA," find us, then select "Install" to download the app to your device.

Is the mobile app free?

Yes. The BELLA app can be downloaded for free.

Please note that standard SMS text messaging and web browser application fees from your mobile phone provider may still apply. Please contact your mobile service provider for details.

What kind of actions can I perform using online banking?

BELLA users may access and manage their checking and savings accounts, transfer funds between accounts both in and outside the BELLA system, keep track of current transactions, review account history, and submit member service requests via secure messaging, all in one place.

SAVINGS ACCOUNT

Interest Rate on BELLA's Savings Account

The current interest rate on BELLA's savings accounts is 0.3% with an Annual Percentage Yield (APY) of 0.3%.

Find the most up to date interest rate in [this document](#).

Other Interest Rate Questions

In the event an agent is asked by a member about our interest rates, the agent should include the following pieces of information in their answer:

1. The agent should explain that interest is calculated on daily balance.
2. The following text must be shared verbatim with members that inquire about the interest rate/annual percentage yield: "The current interest rate on BELLA's savings accounts is [current rate] with an Annual Percentage Yield of [current rate]"

3. For BELLA's current rate, please see the internal FAQs. (@jboyle will manage this)
4. The agent should indicate to the member that interest is paid monthly
5. The agent should tell the member that "If the account is closed, then interest will be paid up until the date of account closure."

*As of 11/27/20, the Bella savings interest rate is 0.3%. Find the most up to date interest rate in [this document](#).

Internal FAQs

Frequently Asked Questions - Not posted to the website

How do I refer to members via email or Slack?

By Bella ID or Ticket number. NEVER by email or name, this opens us up to privacy issues.

What do I say if they ask “Are you human”?

Tell them you're a human! Feel free to tell them your name and your preferred pronouns.

What do I do if a member is threatening legal action?

Let the member know that they can reach out to our legal team at legal@bellaloves.me and that I would be happy to also submit a service ticket to let legal know they should look out for your email. Then the agent should *immediately* email legal@bellaloves.me, compliance@bellaloves.me, privacy@bellaloves.me, and support@bellaloves.me to alert the BELLA team of the issue in addition to any service tickets the agent submitted. It's better to over email about legal issues!

Where do I direct a member if they want to work at Bella?

<https://www.bellaloves.me/team/>

At the bottom of the page there is an Open Positions button. That will open the LinkedIn page and current job listings.

Where do I direct a member if they want to collaborate with Bella?

Depending on the type of request, use your discretion and ask them to email:

1. collab@bellaloves.me - If they are looking to work together on events, products, or community impact projects.
2. ambassadors@bellaloves.me - If they want support for their business or swag (tshirts, hoodies, etc).

How can a user remove a linked funding account (i.e. the account they link to add money into their BELLA account)?

The app currently doesn't allow users to unlink accounts. This option will be available in a future release of the app. If the user needs their account unlinked, the agent can open a ticket and the BELLA team can do it. Once the account has been unlinked by BELLA, the user will be able to link a new account in the app. However, this can only be done once every 90 days for security reasons.

What to do if a member says their account is suspended?

- Ask user for their last 4 of SSN, Date of Birth, and how many savings accounts they had open (if they don't remember, that's ok)
- Alert [Michelle Beatty](#) in Slack with Conversation ID (she will verify and then notify our tech partners to remove the suspension)
- Tell user a member of the Bella team is looking into it and that we should have the issue fixed shortly (this should be within 24 hours, depending on time of day)

Who should you contact if you have issues with the verification code / confirmation emails?

New Customer:

- Probe and find out if it is because they are tapping "Activate" instead of "Sign Up"
- If that doesn't solve the problem, agents should email support@bellaloves.me, from their outplex email address and cc their supervisor, and include the customer's email address and information on the issue to in the body of the email

Beta:

- Let them know that we're working on a technical fix and that we recognize the issue
- Agents should email support@bellaloves.me, from their outplex email address and cc their supervisor, and include the customer's email address and information on the issue to in the body of the email
- Do NOT tell them to remove the app. Ask them to be patient and that we'll follow up with them via email when the issue is resolved.

Can beta testers delete the old bella app?

YES, beta testers should delete the old app and install the new one. Then click "Activate" (soon to be renamed "Sign In")

What's the email for Member Experience team?

support@bellaloves.me

What is the Selfie section?

- Cece is checking with Will re what is "selphie"
- Let them know that we're working on a technical fix and that we recognize the issue
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- Do NOT tell them to remove the app. Ask them to be patient and that we'll follow up with them via email when the issue is resolved.

What do I do if someone gets denied?

- If first attempt - "We're so sorry to hear that. There are a variety of reasons someone might be denied. Please try again and double check that you entered your information correctly."
- If multiple attempts result in denial - "We're so sorry! Please try again in a couple of weeks as the process is always improving. :) Until then, I'm always here."
- If they keep asking questions, here are a few replies:
 - This can happen for a number of reasons
 - We're not able to share specific details (for security reasons)
 - They can retry, making sure to input all their information correctly
 - We are consistently working with our partners to ensure we can onboard as many users as possible
 - If you don't get approved today, you can try again in a couple weeks, as the process is always improving

Can I provide reasons to the member as to why they were denied?

- No, you can't. Just say "Unfortunately we are unable to provide that information."
- See above

I receive social security in my children's names, can I direct deposit them into my account?

Unfortunately we are unable to provide advice regarding social security deposits. Please reach out to the Social Security office and ask them what type of account is needed to deposit these funds.

Can I have a negative balance on my account?

Bella does not allow negative balances. If you don't have funds at the time of purchase it won't go through.

How many reimbursements will members get for ATMs?

At this time we are refunding all ATM charges for all members. {Internal: IF we choose to change this back to 2 times a month only, we will have an alert in the Agent Widget. For launch and all founding members, this is lifted and everything is refunded }

Visa FAQs

NUMBER: 1-800-847-2911



Need to Dispute a Payment Card Transaction?

<p>UNLESS ... <i>Your Transaction is:</i></p> <ol style="list-style-type: none">1. An ABC CU ATM transaction: Contact our ATM Dept. at (888) 555-1212. OR ...2. If a Mobile Deposit or3. ACH transaction, please contact your local branch. <p>To dispute a payment card transaction ...</p>	<p>1. Contact the Merchant:</p> <p>The majority of billing errors can be resolved in the most efficient manner by contacting the merchant directly. Should the merchant be unwilling or unable to correct the transaction, or if you do not recognize the charge, you may request our assistance.</p> <p>NOTE: Pending charges cannot be disputed until they post to your account.</p>	<p>2. Prepare & File:</p> <p>Gather all necessary documentation, such as receipts, proof of return, copy of communication with the merchant, or any other information relevant to your dispute case.</p> <p>Then, call (800) 555-1212, option #X, and a representative will process your dispute.</p> <p><i>Please make a note of your dispute case number.</i></p>	<p>3. Keep in Touch!</p> <p>We may send you a letter, requesting additional information. Be sure to read, and respond promptly, to any correspondence you receive from us.</p> <p>You may call (800) 555-1212, option #X, with your dispute case number, to inquire on the status of your dispute case.</p>
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Frequently Asked Questions:

When will I be reimbursed for my disputed charge? Your debit account will be provisionally credited within 5 business days of your case being filed, unless you hear from our main office during that time. Your credit account will exclude the disputed amount from billing until the dispute is resolved. There may be conditions under which provisional credit is not granted.

May I keep my current card? In cases that involve billing errors with authorized merchants, your current card will remain open. This includes situations such as an incorrect amount being charged, the charge was made on the wrong date, an ATM terminal did not dispense funds, etc. In cases of fraudulent or unrecognized charges, your card must be blocked immediately. We will issue a new card and number to prevent further unauthorized charges to your account. Please contact your local branch to request a replacement card.

What can I expect after filing a dispute? We may need signed paperwork or further details on the transaction from you while we conduct our investigation. All requests for additional information will be sent to you via U.S. Mail, so please be watchful for communication from us, and respond as soon as possible. **You may risk losing your provisional credit** if you do not respond to our requests by the dates indicated in our letters.

How long does the dispute process take? By law, the dispute process may take from 45 to 90 days for final resolution. If the dispute is found in your favor, you will receive a letter indicating that the case is closed, and the provisional credit will remain in your account permanently. If we receive a merchant response with supporting evidence that the charge was legitimate, we will send a copy for you to review. If this occurs, you may respond and send additional information to us for further review.

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Agent Scripts

Scripts that agents should follow in specific scenarios.

CCPA

View BELLA's full CCPA Policy [here](#).

What is CCPA?

- The California Consumer Privacy Act (CCPA) permits consumers who are California residents to (a) ask a covered business which categories and pieces of personal information it collects and how the information is used; (b) request deletion of the information; and (c) opt out of the sale of such information, if applicable.

Does the CCPA apply to me if I don't live in California?

- While the CCPA only applied to California residents, BELLA believes everyone should have these rights. We are proud to say we will honor any CCPA requests regardless of your geography.

I don't have a BELLA Account, can I still make a CCPA request?

- Yes, anyone can make a CCPA request. Please provide your first and last name, email, phone number, and which CCPA request you would like to make.
 - Agent then fills out [this form](#) for non-account holders only. Account holders must make request through Bella app where agent can submit a service ticket through the widget.

Interest rate

What is the current interest rate?

- The agent should explain that interest is calculated on daily balance.
- The following text must be shared **verbatim** with customers that inquire about the interest rate/annual percentage yield:
 - "The current interest rate on BELLA's savings accounts is [current rate] with an Annual Percentage Yield of [current rate]"
 - Pull data from [this document](#).

- The agent should indicate to the customer that interest is paid monthly
- The agent should tell the customer that “If the account is closed, then interest will be paid up until the date of account closure.”

Onboarding and Manual Review

I was trying to create an account and got to a screen that told me to message you, it says you need more information. Can you help?

- Thank you for reaching out, we’re really excited about your interest in joining Bella. A member of our team will be reaching out shortly via email to collect more information, please keep an eye on your inbox over the next 48 hours. In the meantime I’m available for any other questions you have (End of a personal note - use emojis and love)
 - Agent doesn’t have to create a ticket for now, you just acknowledge and be present for the member.

Bella Culture

With Great Power Comes Great Responsibility

WHO IS BELLA?

Gender: Non-Binary

Pronouns: They/Them

Early 20s - Mid 30s

Bella is fun, sarcastic, and informal. They are very easy to talk to and kind.

They always maintain a “we go high” attitude, depending on emotional intelligence.

They understand that people are different and you have to listen, even when it’s in writing.

They stand up for themselves, and for people with a smaller voice.

Bella loves building community, not only within their company but outside too.

“When they go low, We go High”

-Michelle Obama

HOW BELLA COMMUNICATES

Socratex + Squad

Socratex

BELLA uses a TAP TO TYPE box in both the app and web page to help their members.

Let Bella know what you need then Bella will search their functions to find it.

The Bella Squad

The Bella Squad are calm and collected, but very bright.

You will always welcome your member even though they start the conversation with direct questions - you’ll be surprised how many smiles you’ll see(or feel) on people's faces when they know they are interacting with a *real* person.

OUR VALUES

Communication

Communication is key. It’s how we express ourselves. The way we communicate with each other, that LOVE spirit will be transmitted to our members. HAPPY YOU = HAPPY MEMBER

v2 - 11/30/2020

page 36

Innovation

We never give up seeking creative solutions for our members and we encourage our teammates and help them with those creative solutions

Intensity

Intensity is what drives us forward. We value people who go above and beyond, apply all their unique talents to the task, and act with clarity, intention, and grit.

Empathy

We put ourselves in people's shoes. We understand that there are different perspectives and that we do not always know what kind of day people are having, but we will strive to make it better.

Equality

We value, respect and love people of all backgrounds, ethnicities, sexual orientation, race and gender.

SYSTEMS THE BELLA SQUAD USES

Conversational Cloud

What's cool about our CONVERSATIONAL CLOUD is that it's a real time messenger. It's asynchronous, this means that the member can engage and then walk away, close the conversation and go about their day and come back whenever they want and we will be there no matter what.

Agent Widget

Inside the Conversational Cloud is our AGENT WIDGET. Our Agent Widget is something that can be accessed at any time with a login that will be provided only for you. This agent Widget will have all the information you need to know who you are talking to. This information is confidential and you are being trusted with this responsibility.

DISCRETIONARY FUND

Encourage to Encourage to Encourage

We give you the power to help our members when they need it.

Each agent will be allotted \$1000 per month to assist with those unplanned situations.

EXAMPLES:

A member is filling up his gas tank but the money from his linked account hasn't come through, even though they have the Emergency Fund option you can decide to give that member the money needed to fill up their tank.

It can be as simple as a member writing in and you have a feeling, because of how the conversation is going, that they are not having a good day. Gift them \$5 dollars to buy a coffee or set up a little treat for them to relax.

**SEE MORE IN DISCRETIONARY FUND SECTION BELOW

Discretionary Fund Procedure

Procedures to guide the Bella CX team in using their discretionary fund.

Introduction

A discretionary fund is an amount of money available to MXT members with the ability to provide excellent member experiences. When a member is in need of a little extra assistance, maybe their check has not cleared and they need to pay rent or they are frustrated by a fee they didn't expect, we are here to solve problems and think outside the box. At Bella, we strive to keep our members happy even if it doesn't sound like the smartest business decision.

Policy

The expenditure of discretionary funds must relate to the Bella ethos. Therefore, the use of discretionary funds shall be limited to expenditures that benefit BELLA in advancing its mission and public purposes. Discretionary funds are gifts and do not need to be repaid.

Only current, active Bella members are eligible to receive discretionary funds. Discretionary funds shall not be used in a manner that primarily benefits the employee, close family relative, board member, or anyone otherwise directly connected to the grantor or approver of the funds.

If an employee utilizes the entirety of their individual discretionary fund before the last day of the month, the Department Manager may authorize additional funds to be granted to the individual.

Use of discretionary funds must be retained on a member's account history by creating a case record for the use of funds. The case record must include: date of allocation, amount of funds provided, employee's name and any approval records (as applicable), and a brief description of the purpose for the distribution.

The total monthly spend of all employees' funds must also be calculated in the department's accounting log by MXT Management within 6 days following month end and reported to the Accounting department for budgeting.

Guidance

All MXT members will be allotted a specified amount of discretionary money on the first calendar day of each month. The individual fund amount will be decided by the leadership team and communicated to the MXT on the day the money is made available. Money may be used, within the discretionary limits outlined in the Approval Level section, at the employees' discretion to remedy member issues or provide necessary member service.

Once the money has been allocated and "spent" the employee no longer has access to funds for these purposes until the first day of the next month or on a case by case basis with appropriate approval.

Employees may use their insights and discretion to provide funds to Bella members as they deem appropriate. Any reason may be acceptable, within reason.

Approval

Once a MXT member has identified a member need and believes that the member is entitled to discretionary funds, they may proceed within the following thresholds:

Level	Fund Controls
MXA	up to \$100 no approval needed \$100.01+ per charge requires approval
Senior MXA	up to \$300 no approval needed \$300.01+ per charge requires approval
MX Lead	up to \$500 no approval needed \$500.01+ per charge requires approval <i>may approve CXA or Sr CXA requests up to \$500</i>
MX Manager or Department Manager	final approval over limit for any level or amount for the team

	<i>decision maker for type of fund accessed - discretionary, emergency, etc based on request</i>
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In the event an employee recommends providing funds above their approved threshold, the employee may seek approval from a MX Lead or Manager, depending on the requested dollar amount.

When preparing a decision, the MX Lead or Manager must make an informed decision to approve the use of large amounts of funds for a single individual as this affects further use and budgets for the broader team.

Based on the information provided by the requesting employee, the MX Lead or Manager should be able to understand the situation and make a decision without personally assessing the members account.

An agent should ask probing questions to assist the member and make an informed recommendation.

Sample Questions

- Check previous message history; is the member experiencing any sort of issue with Bella (technical or relational)?
- What is this member trying to accomplish? What is their end goal?
- Has the agent reached out to their peers to see if a solution is already in place?
- Do the members have multiple accounts? Are they using all of Bella's functionalities? (Karma, Direct Deposit, Savings accounts with goals, etc)
- Does the member use Bella on a regular basis?
- Are the members regularly accessing emergency or discretionary funds? Is there a better way Bella can offer to help the member?
- Is there a negative pattern of behavior?
- What is the reason a high dollar amount is required?
- What is the risk level to Bella?

Banking Services

Standard Banking Services that Bella offers

Checking Account

- *One Individual account with no minimum balance to open and/or maintain.*
- *One Free physical Debit Card upon account opening (Delivered in 7-10 Business days)*
- *Non-Interest Bearing and Fee free (No Maintenance fee)*
- *Account to Account transfers among BELLA users*
- *You can link one external account to fund your Bella account. (Funding takes 3-5 business days)*
- *Monthly statements available in app. (Downloadable)*
- *No Joint Accounts*

ACCOUNT TYPES

FOUNDING MEMBER

- Coordinated checking and savings accounts, powered by rules, automation and goals
- 24/7 Member support
- Free banking
- All FX and ATM fees reimbursed by Bella
- Contactless debit card with Apple/Google/Samsung Pay

BASIC

- Coordinated checking and savings accounts, powered by rules, automation and goals
- 24/7 Member support
- Free banking
- All FX and ATM fees reimbursed by Bella
- Contactless debit card with Apple/Google/Samsung Pay

BONUS (TBD)

Requirements

- Receiving direct deposits of at least \$2,000 per month OR
- Debit card spending of at least \$1,000 per month

Offering

- Unlimited free trades in full universe of stocks, ETFs and Thematic Portfolios (~1000 names)
- Unlimited reimbursed ATM surcharges
- 1% FX reimbursement
- Status can be retained indefinitely through continued achievement of monthly thresholds.

v2 - 11/30/2020

page 44

PREMIUM (TBD)

- Unlimited free trades in all available stocks, ETFs and Thematic Portfolios
- Unlimited ATM surcharge reimbursements
- 1% FX fee reimbursement
- 24/7 Premium concierge
- Pricing:
 - TBC
- Human financial advice

Debit Card

- BELLA Surprises (surprise cashback) and Pay it Forward community gifts
- Debit card transactions are captured in the transaction feed / Transactions searchable
- Monthly statements are available and downloadable
- Contactless payments anywhere Visa is accepted
- Apple Pay, Google Pay and Samsung Pay enabled
- All card replacements are free (for lost, stolen or damaged cards)
- You can freeze/unfreeze your card in the app, without completely blocking it.
- You can block your card in the app if you lose it. (Your account will not be blocked, only your card)

Savings Account

- Always Free! (No Maintenance fee)
- Unlimited savings accounts for different goals (i.e trip to Hawaii, new Iphone, new bed)
- Maximum of six withdrawals from each savings account per month.
- Interest paid on all your deposits. At the time of launch, the rate is 0.3% APY.
- Upon account opening, user specifies time and/or amount goal - *optional*
- Upon account opening, user has options of setting rules for funding the account
- You can be specific about your savings goals and set completion dates
- You can set conventional and unconventional rules for funding your account. (i.e when it rains fund my Hawaii trip with 10 USD)
- Upload Pictures to your different accounts

Conventional and Unconventional Rules

Set your own savings goals based on your preferences.

CONVENTIONAL RULES

- Transfer a certain amount from checking to savings on a specific date/frequency

UNCONVENTIONAL RULES

- Transfer a certain amount from checking to savings based on the weather and the results of your favorite sports teams

Credit Card

TBD

Investment Account

TBD

Budgeting

TBD

Bella Soul

Banking Products that only Bella offers

Karma Account

- Cardless DDA account
- This account will only be used to “Pay it Forward”
- You can have up to \$20 dollars in the account
- Completely randomized
- You will be able to Pay it Forward with a \$3 dollar coffee or even a \$20 dollar meal.
- You can transfer that \$20 back to your own account at any point prior to any “Pay it Forward” debits.
- Someone else can “Pay it Forward” to you even though you don't have an account.
- You will receive notifications, every time you “Pay it Forward”.
- Non-Interest bearing and Fee Free (No Maintenance fees)
- You can have it with \$0 dollars

Karma Score

- TBD

Blink *(Internal Term)*

Blink is a debit card rewards program that incentivizes members by tapping into the heart and soul of BELLA (with a focus on giving back and community). The offerings that live under Blink are: Surprise Cashback, Karma Account, Social Impact, and the Emergency Fund.

- Surprise Bella members
- Foster a “community idea”
- Do something good for the community
- More productive use of marketing budget
- Activate user generated content

Bella Surprises

(Surprise Cashback)

- Surprise and delight members with “random acts of Cashback”
- Cashbacks can be from 5% to up to 200% (Intended to be extreme)
- The program is randomized

Pay It Forward

- Enable users to surprise each other with Pay it Forward (random acts of community Cashback)

Emergency Fund

- Support emergency funds access in times of need

Backed by Bella

- Leverage the BELLA “tribe” to automatically fund initiatives based on user preferences, directly from Karma Accounts

BellaLoveMeIndex100

TBD

Bella Connection

How Bella Connects

How Bella Communicates

Account Connectivity

How Bella Connects you to your External Account

Plaid

Plaid is an API that connects thousands of financial institutions to their clients and their accounts. <https://plaid.com/what-is-plaid/>

Products

AUTH, IDENTITY AND BALANCE

These three Plaid products are used to link external bank accounts to BELLA. Each time a user seeks to link an account or fund via an external account, these APIs are called to ensure the accounts both belong to the user and that the balance is sufficient.

Product Features

AUTH

<https://plaid.com/products/auth/>

Instantly authenticate accounts

- Retrieve account and routing numbers when users connect their checking or savings accounts using bank credentials

Connect accounts from any US bank

- Set up ACH transfers from any bank or credit union in the US

Set up frictionless payments

- Plaid works with any ACH processor, including Stripe and Dwolla

IDENTITY

<https://plaid.com/products/identity/>

Verify user identities using bank data

- Retrieve user names, phone numbers, addresses, and emails for individual and joint accounts—data can be used to complement KYC procedures

v2 - 11/30/2020

page 51

Personalize forms for onboarding

- Auto-fill forms with identity data when users link their bank accounts

BALANCE

<https://plaid.com/products/balance/>

Reduce NSF fees

- Protect against overdraft and NSF fees by having visibility into available funds before you transfer (US and Canada)

Enable account pre-funding

- Enable pre-funding of accounts with insight into balances (US and Canada)

Comprehensive data

- Verify real-time account balances

Microdeposits

Alternative to Plaid

If a user's bank isn't supported by Plaid or if the user prefers not to link via Plaid, we can originate two microdeposits into the external account that the user then needs to confirm to link the accounts. Then there is a withdrawal for the corresponding total.

Micro-deposits are small sums of money that are transferred online, from one financial account to another. The deposits are typically less than \$1 and are sent to your account by another financial institution to verify it is the correct account.

Socratex

How Bella Communicates with Members

People just want to execute their operations in the fastest and easiest way possible. Here, we think Socratex will excel, removing typical navigation menus and transforming your natural language into actions. Today, Socratex is a very basic UX that we can elevate, together, into a compelling AI experience that maybe one day won't require a screen to use.

v2 - 11/30/2020

page 52

Tap to Type Box

- For one letter that you type we will suggest 10-15 words that will lead you to where you want to go (e.g. "C" could be Cards, Checking, Check my investments")
- 150 actions (predefined environment but always learning from the member) but I can ask for them in 1000 different ways.
- TTTB is available in the app and in our webpage

Customer / Member Support

Bella Squad / Extension of Bella

Main Service

Authenticated Members (Bella Members)

- Help Desk support for technical issues
- Financial Support (TBD)
- Investment Support. (TBD)

Unauthenticated Members (Possible members or members that have been locked out)

- Prospect's first contact
- Bella's product offer/vision/ethos walkthrough
- Onboarding Assistance.

Hours Of Service

- 24/7

Touch Points

- Unauthenticated: Webchat from bellaloves.me website
- Authenticated: Bella App and Personal Area on bellaloves.me

Agent Platforms

- Conversational Cloud / Agent Workspace / Live Engage (Live Person)
- Agent Widget (Inside LiveEngage)

Agent Access Levels

- MX Agent
- MX Associate - MX Lead
- MX Manager

Love Data

How we get to know our members

Love Data is everything personal about our clients that they choose to tell us. With this information we will be able to be personable and make sure they know we know them and are here to take care of them.

REMEMBER: LOVEDATA is an Internal term

- Can be added in the agent widget
- Can come through conversation
- No access via app to add likes/dislikes

SLAs

Service Level Agreements Squad w/ Member

HOW TO SUPPORT A MEMBER

Problems and/or solutions will be addressed directly with you, the Bella Squad. You will be able to answer almost every question the member has. The member will only speak to you directly.

If escalation is needed you will need to contact our Bella teammates through ticketing they will then reach out to our partners.

You will then need to provide the information/updates and/or solution to the member.

HOW TO SET EXPECTATIONS

The quality vs timing of the service

Be Present

If you know the answer and you can deal with member's issue - it's 100% on you to set the expectations (time - communication - follow up - resolution)

Escalation

99% of the responsibility is still on the agent. Ease wait times.

Be Honest

Explain the process, and update. Give them ease.

Timing

We will learn with experience. The wait times will become relative to the way you behave.

TONE OF VOICE

Be Kind

We acknowledge the absence of a genuine warm *hello* when we visit a local bank branch or contact with any company's member support. At Bella, we look at it as an opportunity to strive for a helpful and friendly approach to create an inclusive environment.

Be Empathetic

We understand the lack of connection in the banking industry. It has become a commodity where the expectations to have a helpful, human connection with your bank is zero.

Be Personable

We tailor every conversation based on the member in front of us. We strive to surprise and delight in every interaction.

"I've learned that people will forget what you said, people will forget what you did, but people will never forget how you made them feel."

Maya Angelou, American author and activist

SERVICE LEVEL AGREEMENT

Maximizing your time.	Metrics	Description	Individual	Team
	Online Rate	Time Agent is logged into CC (Online-Away-Back Soon)	85%	80%
	Load	Avg load per Agent's Active/Inactive Convos	>85%	>80%
	CCPLH	Closed Convos per logged hrs	>78%	>75
	Active Rate %	% active convos over the total of convos	>78%	>75%
	Agent Close Rate %	Closed Convos by the Agent	>45%	>40%
	Auto Close Rate %	Closed Convos by the System - Autoclose	<35%	
Responding to members	Average Response Time	ART	>2 mins < 10 mins	>3 mins <15 mins
	Time to First Response	TTFR	<2 mins	<3 mins

	CSAT	Customer Satisfaction (coming from the conversation - through post conv survey)	>86%	
	Meaningful Connection Score MCS	Automated real time measurement of member feelings	>30	>28

End of Conversation	Metrics	Description	Individual	Team
	Repeat Contact Rate 1hr.	RCR within 1 hour	<4%	<5%
	Repeat Contact Rate 3d	RCR within 3 days	<7%	<9%
	Return to Queue %	# of convos returned back to the queue	<2.5 %	<3%
	Transfer Rate %	Transfer convos to another skill in a day	<4%	<7%

Turn around time frames:		
	Lost/Stolen/Damaged Card	7-10 days
	Replacement Card	7-10 days
	Receiving Money via Acct/Rt	3-5 Business Days
	Pulling Money via Acct/Rt	5-7 Business Days
	Disputes	If <\$20 Bella covers so the credit is immediate. If > \$20 would need to go through a dispute process and NBKC may provide provisional

		credit. (See table below)
	Rush Cards	Not Available

NBKC Disputes

	Complete Investigation by:	Deposit Provisional Credit by:	Notify of Provisional Credit by:	Correct if the Account is in Error by:	Notify Member of Final Ruling by:
Standard 10 Day Investigation	10 business days from notification date			Within 1 business day after determining that an error occurred	Within 3 business days after completing investigation
Standard 45 Day Investigation	45 calendar days from notification date	Within 10 business days of notification date	Within 2 business days after the provisional crediting	Within 1 business day after determining that an error occurred	Within 3 business days after completing investigation
New Account Exception, 20 Day Investigation	20 business days from notification date			Within 1 business day after determining that an error occurred	Within 3 business days after completing investigation
New Account Exception, 90 Day Investigation	90 calendar days from notification date	Within 20 business days of notification date	Within 2 business days after the provisional crediting	Within 1 business day after determining that an error occurred	Within 3 business days after completing investigation
POS Debit Card or, Foreign-Transaction Exception, 90 Day Investigation	90 calendar days from notification date	Within 10 business days of notification date	Within 2 business days after the provisional crediting	Within 1 business day after determining that an error occurred	Within 3 business days after completing investigation

Agent Widget

Widget inside Live Engage only for Bella

WIDGET WALKTHROUGH

(Screenshots to Come)

TAB ONE

Overview

- Calendar

User

- Member since
- Gender
- DOB
- SSN
- UserID
- BellaID
- User type

Contact info

- Mobile number
- Email
- Residence address
- Account status

Account overview (transactions by account type).

- You can click on Transactions to search.

TAB TWO

Card

Card

- Card Details / Current Card
- Card Status
- Lock Status
- Card Number (Last 4 digits)
- Expiration date (Month/Year)
- Delivery Address
- Lock Button (can freeze, lock, physically damaged, lost, stolen, suspected fraud)

v2 - 11/30/2020

page 61

Card Details / Cards History

- Expiration
- Card Number
- Status
- Lock

Daily Limits {COMING SOON}

- ATM (Max \$500)
- Purchases (Max \$5000)
- Cash Transfer (Max \$3000)

Card Transactions (Searchable and easy Month/Year Access)

- Date
- Description
- Type
- Amount
- Status

TAB THREE

Interactions

Ticketing

- Date (DD/MM/YY)
- Summary
- Number
- Status

TAB FOUR

LoveData

Add Love Data by Category

- Relationships
- Life Event
- Pet
- Preferences
- Activities

LoveData {COMING SOON}

- Relationships (Partner, Family, Pets)
- Preferences (Language, Transport, Housing, Supporting)
- Activities (Hobbies, Sports)
- Locations (Last Country Visited)

Savings Goals {COMING SOON}

TAB FIVE

App Activity

- User account status
- Biometrics (Face ID, Touch ID)
- Device
- Access Info (Login Activity, User Activity)

Bella Troubleshooting/Ticketing

How to create tickets

Ticket Categories

Technical Issues

- App
- Bella Platform
- Bank Platform
- Debit Card
- Other (fill in topic)

Bank Issue

- Fraud
- Transactions
- Onboarding
- Debit Card
- Account Details
- Bella Program
- Other (fill in topic)

Member Support

- Discretionary Fund Approval
- Concierge
- Debit Card
- App
- BLINK
- Subscription
- Account Assistance
- Other (fill in topic)

CCPA

- Delete
- Access
- Opt-Out
- Disclosure

Priority Levels

High Priority

- Major inconvenience
- No alternative functions available
- Explicitly affects experience and prevents functional use
- Includes compliance, risk, and security directly

Medium Priority

- Minor to moderate inconvenience
- Alternative functions available
- Affects experience but does not prevent functional use

Low Priority

- No impact to available functions
- Does not directly affect members' ability to use the platform or app

How to Create a Ticket

Step 1: In your agent Widget click on the INTERACTIONS tab.

Step 2: Click Create Ticket

Step 3: Select Category and Priority

*Ticket will be created in Widget and go onto Salesforce

Where do Tickets go

Creating a ticket in

Product or Feature request

- App / Platform
- Community

Goes to: *Product Team*

Member can email: support@bellaloves.me

Escalation:

Goes to: Vegans

Salesforce Ticket updates → Agent Widget ticket updates

v2 - 11/30/2020

page 66

Technical Issue/Support

- App
- Bella Platform
- Bank Platform
- Other

Goes to: *Product Team*

Member can email: support@bellaloves.me

Escalation:

Goes to: Vegans

Salesforce Ticket updates → Agent Widget ticket updates

Bank Issue/Support

- Account details
- Transactions
- Bella Program
- Onboarding

Goes to: *Banking Ops Team*

Member can email: support@bellaloves.me / compliance@bellaloves.me

Escalation:

Goes to: Visa / Q2 / CPI

Salesforce Ticket updates → Agent Widget ticket updates

Member Support

- Concierge Request
- Discretionary Fund Approval
- Account assistance

Goes to: *MX Ops team*

Member can email: support@bellaloves.me

v2 - 11/30/2020

page 67

Salesforce Ticket updates → Agent Widget ticket updates

CCPA Request

- Delete
- Access
- Opt-out
- Disclosure
- Multiple

Goes to: Product + Ops team

Member can email: privacy@bellaloves.me

Escalation:

Goes to: NBKC (National Bank of Kansas City)

Salesforce Ticket updates → Agent Widget ticket updates

Onboarding and Manual Review

Member will say: I was told to message you, it says you need more information. (something similar)

Tell the member: Thank you for reaching out, we're really excited about your interest in joining Bella. A member of our team will be reaching out shortly via email to collect more information, please keep an eye on your inbox over the next 48 hours. In the meantime I'm available for any other questions you have (End of a personal note - use emojis and love)

Agent doesn't have to create a ticket for now, you just acknowledge and be present for the member.

Disputes

ACH Disputes by Messaging

*If ACH dispute comes through the web page direct them to the Bella app so you can access the Widget

Step 1: Member disputes transaction

Step 2: Agent gathers relevant information (date, merchant, amount etc.)

Step 3: Agent creates ticket in Bank support with the info provided by the member. (Be specific about what the member is disputing, ex. ACH Dispute)

*Be present for the member and update as updates come.

ACH Disputes by Phone

TBD

Debit Card Disputes

Step 1: Member disputes

Step 2: Agent will provide Visa DPS phone number and FAQs (see Bella-VisaFAQ+Number) and create tickets on the widget.

Step 3: Let the member know that when investigation concludes they will get a letter from Visa with additional information.

CCPA Requests

*Non members can submit a CCPA request

For Bella Account Holder

Step 1: User Submits CCPA Requests through Message to Agent

Step 2: Agent Creates Ticket in Agent Widget, notes which request(s) were made, and any action taken during the conversation

For Non-Bella Account Holder

Step 1: User Submits CCPA Requests through Web Message to Agent

Step 2: Agent opens [Google Form](#) and fills it out

Step 3: BELLA Operations creates ticket in the back end

Types of CCPA requests

Delete

Agent submits a ticket / form. Product Team deletes Love Data

Access

Agent submits a ticket / form. Product team sends encrypted file of all data we have collected over past 12 months

Opt-Out

Agent sends the member our [Privacy Notice](#) before submitting a ticket. Product Team alerted and user preference recorded

Disclosure

Agent sends [Privacy Statement](#) before submitting a ticket

Bella Security

Security 101

INTRODUCTION

Fraudsters are getting more and more tricky as we move forward in time. Their only goal is to get money from one person, if one person responds and gives them access that generally means that a few others will as well. The more that respond to their bait the more money they can steal and disappear with.

30% of phishing messages were opened in 2016 – up from 23% in the 2015 report. 95% of breaches and 86% of security incidents fall into nine patterns. 70% of cyber attacks use a combination of phishing and hacking. Roughly 156 million phishing emails are sent globally every day, so even if a fraction fall for the scam, phishers score big.

Fraud

Fraud is any charge that was not initiated/authorized by the member. So if there is a merchant that the member has never done business with showing up on your statement then this is fraud. This would be a claim with VISA.

For a fraud claim there is usually a form that is filled out.

The form usually needs:

1. Date of transaction
2. Dollar amount of transaction
3. Merchant.

What can trigger a Fraud alert?

- Out of normal business areas.
- Ordering online that happens to be out of the country.
- Ordering online from a new site.
- Larger than normal purchases for your history.
- App & card not in same geolocation.
- Travelling (Not really necessary as NBKC is saying that they don't have issues w traveling fraud alerts)

There is usually a yes or no, some examples are:

1. Have you ever done business with this merchant before?

If the answer is yes, how long ago. If not, you would move on to the next part of the ticket/form.

Usually there is a disclosure that is read or you must check that you have read and that you agree that everything you stated is true and that it can take 7 - 10 business days for a provisional credit to show in your account. (there are different rules on timeframes and dollar amounts with Bella) Then it gets submitted.

- Visa Process. Claim submitted - Research team - Research team ask questions of /reaches out to the merchant - Ask for further verification from cust an/or merchants if necessary (Merchants have a set # of days to respond, if they do not respond it automatically falls in favor of the member and the merchant is charged back for that dollar amount.)- VISA makes a decision based on what they find - make provisional credit final or they re-debit provisional credit from the member if proven not fraud, they are required to send out a letter to disclose if it is a permanent credit or if they will be debiting their account. VISA does communicate with the member and is required to send out notices to them. Some will try to say they were never notified.

Disputes

This is when you see a charge that maybe you cancelled and is still showing up on your bank statement.

Example: The recurring gym fee. If you signed up for that 7 day trial and in the fine print it says that if you don't cancel in the timeframe they will start charging you \$39.99 every month and when you see that \$39.99 you want to claim fraud. This is actually a dispute. This is also through VISA however it is handled differently on a paperwork aspect of things.

For disputes there is usually a form that is filled out.

The form usually needs

1. date of transaction
2. dollar amount of transaction
3. merchant.

There is usually a yes or no, have you ever done business with this merchant before? Was this a service or a product? What was it? When did you cancel this service? Who did you speak to or how did you cancel (ie email, phone call, ect.). Usually there is a disclosure that is read or you must check that you have read and that you agree that everything you stated is true and that it can take 7 - 10 business days for a provisional credit to show in your account. (there are different rules on timeframes and dollar amounts with Bella) Then it gets submitted.

VISA process. Claim - Research team - Ask questions of merchants - Ask for further verification from cust an/or merchants - Make decisions - refund/charge members. VISA does communicate

with the member and is required to send out notices to them. Some will try to say they were never notified.

Fraud Vs Disputes - What is the difference?

A dispute is a transaction with a merchant you have done business with before. It is not a merchant you have ever done business with then it is fraud. There is some gray area here as to what if it is someone you did business with so many months/years ago but now do not. Generally what I have been told is if it has been more than 6 months without a member initiated contact it could be considered fraud. If ever any doubt that is something that the VISA member service line would make that distinction after asking probing questions.

Zelle/CashApp/Venmo/PayPal Scams

These are tough to really have any recourse on. There is usually a button to say, yes please send anyway even if you don't necessarily know the receiving party. The issue here is there is no way to get the funds back once sent. You can ask the receiving party to send the funds back but they are not required to. For these I would just make sure that you verify who you are dealing with before ever sending funds. As well as verify the number or email address associated.

Fun fact about PayPal, if you have something to dispute you should always go through PayPal first and then your bank because PayPal can shut down your account if you dispute through your bank and not them.

PIN security

Do not share your PIN with anyone. This is generally considered the highest form of security and therefore if you share it and that person uses it in ways that you did not intend there is very little recourse. For example if you give your best friend your card and PIN # and ask them to go to the store for you and get x,y, and z and get \$20 cash back and they choose to get \$60 cash back; that is something that you cannot really fight. You could file a police report and file fraud but from experience VISA is going to come back and say that you gave them your PIN #. This doesn't seem like an issue as it is your best friend and they would never do something to hurt you, ect. I have heard it all. I would urge anyone to always cover your own behind as you never really know when something might not go as planned.

Phishing emails:



service@paypal.com <vqhnhqs0fypxekh-c2tiukwib5yzsn9j@anp0imrk-80468620.it>
To: [REDACTED]@yahoo.com

Mon, Aug 24 at 7:34 AM



Dear Customer,

Your PayPal account has been temporarily restricted. We have found suspicious activity on credit cards linked to your PayPal account. You must confirm your identity to confirm that you own the credit card.

To maintain account security, please provide documents that confirm your identity.

[Log in to PayPal](#)

After you complete the requested task, we will review the account and contact you about its status within 5 working days.

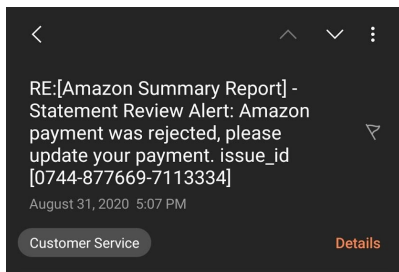
Thank you for your attention to this problem.

This email to those that do not know what to look for this looks like a legitimate email. A few things to look for/ look at is the email address that it came from. Not just the email address that is displayed but the email address that it really is in the light grey. Even though it is displayed as service@paypal.com in black the grey is where it actually came from. If you ever doubt the legitimacy of an email check that.

service@paypal.com <vqhnhqs0fypxekh-c2tiukwib5yzsn9j@anp0imrk-80468620.it>

These emails can also have small typos in them that could be easy to skip over. You can find words that have random letters capitalized. All of those things are little red flags that this is not the real deal.

Here is another example. Big name company but the email is coming from a fraudster not Amazon.



2 items (13 KB)

Show images

01/09/2020

[important message code ZgQk155pcu](#)



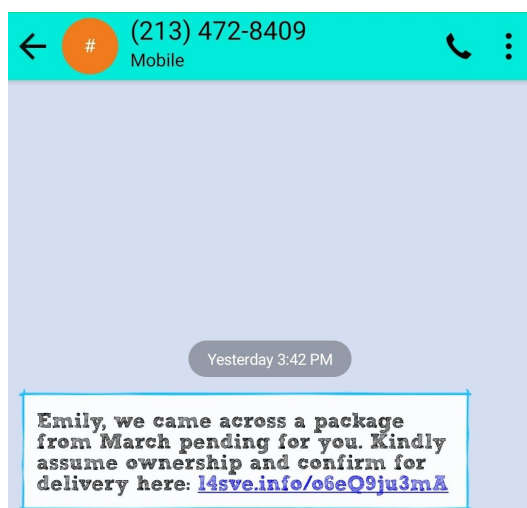
Smishing:

What is Smishing?

Smishing is when you get a text message with a fraudulent link or the fraudster is “fishing” for information via SMS(text). This article was just posted about these smishing texts. These kinds of texts can happen for all sorts of scams so just be aware that if it is not from a number you recognize to not click on any links.

<https://www.wkyc.com/mobile/article/news/investigations/scam-squad/cyber-crooks-pull-mississippi-package-text-message-scam/283-f54e3a99-a474-476d-a21b-17c4bdd64985>

Those can look like this:



Let's just say for example that I was waiting to receive a package and I got this. I would still want to read this and go straight to the web page or site I was waiting on and see if there was an update there vs clicking on the link. Let's say I ordered something from eBay and I got this message. Then I would want to read this, close the message and then launch eBay and see if there were any updates/tracking information available there. I tend to err on the side of caution and be overly sceptical about anything. Knock on wood I have never had to personally deal with fraud on any of my accounts.

Gift card scams:

Anytime someone reaches out whether it be via email, text or phone call this one is always a scam. The person will tell you they are sending you money and that you should send them _____ gift cards in return. This one is one that gets the older generation all the time and unfortunately there is very little we can do about it. You cannot file fraud because you did purchase the gift cards. Often people don't find out until they have sent the images of the gift cards to the other party. The other party will empty the gift cards almost instantly. Whenever I would get this call, I would tell the person to hang up and call those gift cards immediately and see if they can cancel them and get their funds back. Sometimes you can save some of the funds this way but it must be quick. Once the money is off of the gift cards there is almost nothing you can do. You file a

police report but the number/email attached to the scam artist is never attached to that person and has many layers and the police/FBI end up on a wild goose chase that rarely leads anywhere.

How to Protect Your Social Security Number:

You can reach out to each credit reporting agency and "blacklist" your own social, or place it on a freeze. This can only be undone by you. It makes it so that should a new application for credit of any kind come through it would be denied. This means that should you wish to go buy a car or

apply for a new credit card you must call in and unfreeze your social security number and then submit the application. It gives me peace of mind that it won't be used without me knowing about it.

There are 3 main credit reporting agencies. We have TransUnion(855-681-3196), Equifax(888-298-0045 / 800-685-1111) & Experian(888-397-3742).

Downloading a third party app such as Credit Karma is a good idea. It gives you access to see what is happening and keep an eye on things. Your credit score in this app is not always 100% accurate. I have seen the score itself range from 10 - 20 points different than your actual score but it is a way to keep track of what is showing on your credit report. You can also request one free full credit report from each credit reporting agency once per calendar year. For me when I was trying to move my credit I would pull one report in say January then in April I would pull another and then in August I would pull another so I could see the slight changes in my report.

Banking Compliance

BAI Learning Courses and how it relates to Bella

Index

- *BSA and AML: Essentials.*
- *Developing a Complaint Management Policy [Mini-Course].*
- *Unfair, Deceptive, and Abusive Acts or Practices (UDAAP): Mitigating Risk.*
- *Regulation CC: Essentials.*
- *Reg E: Handling Errors and Complaints.*
- *Frontline: Marketing & Social Media.*
- *Contact Center: Handling Complaints.*
- *Contact Center: Marketing Rules & Social Media.*
- *Reg D: Convenient Withdrawals [Mini-Course].*
- *SAR: Responding to Suspicious Activity.*
- *CCPA (California Consumer Privacy Act) [Mini-Course]*

BSA & AML: Essentials

Preparing against money laundering and fraudulent activities.

BSA: The Bank Secrecy Act

Design to detect/prevent illegal activities.

Patriot Act 2001: add focus on combatting terrorism.

Money Laundering

The exchange of dirty funds for clean money. Using transactions to cover up a long trail of illegal funds.

Three (3) stages

- *Placement*: financial institution or the retail space.
- *Layering*: complex transactions to hide where the funds originated.
- *Integration*: the funds re-enter the economy.

Causes of Money Laundering: financial fraud, drug trafficking, tax evasion, illegal arms sales, foreign official corruption, terrorist financing, computer crimes, smuggling, and currency exchanges.

USA PATRIOT ACT - Information Request

- *314 (a) Request*: sharing information with law enforcement agencies.
- *314 (b) Request*: sharing information with other financial institutions.

How does the above apply to bella?

Financial fraud also see computer crimes.

Drug trafficking Bella via NBKC will not be accepting cash deposits.

Tax evasion Agents who know there is a legal action against an account should not engage until they are provided language or a script approved by our LP legal team. You can give the member the email address legal@bellaloves.me and Legal can get more information.

v2 - 11/30/2020

page 81

If Bella is to receive a tax levy/lien you should notify nbkc immediately (currently fintech.inquiries@nbkc.com, with high importance) and we will follow our bank procedures to resolve. If we receive it, we will take action on the account. Agents most likely will not be involved in this part of the process but my comments above most likely will still occur.

Illegal arms sales

Foreign official corruption (this is why banks ask if you have any political affiliation when you apply.)

Terrorist financing (are you seeing a lot of foreign transfers to another country.) These should all go through an OFAC check on the receiver of the funds. This would come up as something very out of the ordinary for the member.

OFAC List

Specially designated Nationals (SDN) and Blocked Persons List: contains the names of alleged drug traffickers, terrorists, terrorist organizations, and/or individuals affiliated with the government or acting on behalf of an entity or nation.

Computer crimes: There are individuals who would get you to send them money via some sort of cash app. The problem with venmo/cashapp/bitcoin/cryptocurrency is once it is sent there is no getting it back unless the receiver chooses to send it back. VISA now blocks large purchases of bitcoin.

<https://www.blackhawkbank.com/cash-app-scams-are-on-the-rise>

Smuggling - NBKC does not have any specific recommendations related to smuggling, but offered some general fraud suggestions:

From a data/reporting perspective: look at frequency of deposits, where the deposits are coming from- name matches to account holder vs. the ACH funds, phone numbers calling in on the account- not matching what is on file, same phone number calling in on multiple accounts.

On the phone be aware of red flags: In a hurry, demanding, trying to get information out of you, rustling of papers to look for the authentication information, or whispering to another person for the information.

Currency exchanges - Bella will not be accepting cash deposits.

BSA Violations

- Knowingly failing to collect or verify CPI information.
- Knowingly neglecting to complete and file a SAR when it's necessary.
- Knowingly neglecting to complete and file a CTR when it's necessary.
- Knowingly completing a wire transfer or selling negotiable instruments when either transaction involves \$3,000 or more and failing to collect and verify member and transaction information.

Penalties: probation, termination, removal of employment in the financial services industry, jail time, and monetary penalties.

*When in doubt, always ask questions to your supervisor.

What does a SAR look like for Bella?

What is NBKC already monitoring for? What that looks like for Bella is TBD. I would also want to stress if there is any doubt to reach out to a supervisor.

Customer Identification Program (CIP)

The exchange of dirty funds for clean money. Using transactions to cover up a long trail of illegal funds.

The CDD Rule: Customer Due Diligence (CDD) Requirements were established in 2016 to identify and verify the beneficial owners of legal entity customers/members.

Beneficial owner

- Each individual who directly or indirectly owns 25% or more of the equity interests of a legal entity member (i.e. "the ownership prong").
- A single individual with significant responsibility to control, manage, or direct legal entity members, including an executive officer or senior manager or any other individual who regularly performs similar functions (i.e "the control prong").

v2 - 11/30/2020

page 83

- A legal entity will have up to five (5) beneficial owners - one (1) person under the control prong and zero to four (0-4) persons under the ownership prong.

Required Information: Name, DOB, Address, SSN (or other).

Compliance: for any new accounts including new accounts for existing members.

Mandatory: verify that the information is genuine.

- Documentary methods.
- Non-Documentary methods: checking unexpired government-issued ID. And when it comes to businesses, certified articles of incorporation or a government-issued license may be checked, also a "certificate of good standing" through the Secretary of State.

OFAC List

Specially designated Nationals (SDN) and Blocked Persons List: contains the names of alleged drug traffickers, terrorists, terrorist organizations, and/or individuals affiliated with the government or acting on behalf of an entity or nation.

Customer Due Diligence (CDD): predicts the types of transactions in which a customer/member is likely to engage, which assists in determining when transactions are potentially suspicious.

Doing it effectively

- Detecting and reporting suspicious transactions.
- Avoiding criminal exposure from persons who use or attempt to use the institution's products and services for illicit purposes.
- Adhering to safe and sound banking practices.

Enhanced Due Diligence (EDD): frequently monitoring high-risk member relationships.

High-risk factors:

- Transaction account history with the institution.
- Geographic location of transactions.
- Attributes of the business.
- Expected and actual cash and fund transfer activity level.

- SAR history.
- Law enforcement agency inquiries.
- 90 days first new accounts.
- High-risk areas, entities and businesses.
- Others.

This is why sometimes accounts can go into manual review. Things have to be checked. This is why Bella may ask to see ID or for more information. While Bella recognizes you as you are we may need to ask for your legal identification for compliance reasons but don't worry you can add a preferred name and pronouns in the app.

Currency Transaction Report (CTR)

It is mandatory. More than \$10,000 of cash transactions (deposits, withdrawals, loan payments, negotiable instruments purchase, and currency exchanges).

Rules:

- Transactions may be conducted by an individual or someone acting on behalf of the individual.
- Transactions may take place at one branch or multiple branch locations.
- Transactions occur in one business day.
- There can be one cash transaction or multiple cash transactions that add up to more than \$10,000 in that business day.

How does the BSA Define One Business Day? e.g. after the cut-off time on Wednesday. Then on the next morning. It is the same business day.

CTR Parts:

- Information on the person(s) involved in the transaction(s).
- Amount and type(s) of transaction(s) that took place.
- Information of the financial institution where the transaction(s) took place.
- Information of the filing financial institution - which is usually, but not limited to, the institution where the transaction took place.

CTR Exemptions:

- *Phase I*
 - Financial institutions.
 - Departments and agencies of the U.S.
 - Any entity listed on the NY Stock Exchange (NYSE) or other national exchanges
 - NASDAQ National Market Security designated company.
- *Phase II* - may be granted an exemption if they meet the following criteria:
 - The entity has maintained a transaction account for 2 months or a risk-based analysis completed. Showed a legitimate business purpose for conducting frequent large currency transactions.
 - Exceeded 10K cash transactions at least 5 times during the last twelve months.
 - Incorporated/organized under U.S/state laws and registered/eligible to do business within the U.S. or a state.
- *Phase III* - payroll purposes if they meet the following criteria:
 - The entity has maintained a transaction account for 2 months or a risk-based analysis completed. Showed a legitimate business purpose for conducting frequent large currency transactions.
 - Frequently withdraws more than 10K to pay U.S. employees in cash.
 - Incorporated/organized under U.S/state laws and registered/eligible to do business within the U.S. or a state.

\$3,000 rule: in cash when is involved in a negotiable instrument purchase, a funds transfer, or a third party transfer. Like traveler's check, wire transfer, etc. Regardless of payment method.

There won't be any CTR's as Bella members will not be able to deposit cash at this time.

Negotiable Instruments: bank check, cashier's check, traveler's check, money order. (Bella does not currently offer these services.)

Existing Deposit Accounts: name of purchaser (primary ID), date of the purchase, type of instrument(s) purchased, serial number of each of the instruments, dollar amount of each of the instruments purchased in currency, specific identifying information, e.g. through a signature card, record, or primary ID. Everything needs to be CURRENT.

No Account Relationship Established: name and address of the purchaser, SSN or Alien number, DOB, date, type of instrument used, serial numbers of each instrument, dollar amount of each instrument, specific identifying information, e.g. through a signature card, record, or primary ID. Everything needs to be CURRENT.

Funds and Wire Transfers: for members and non-members.

-
- **Established Member Information:** name and address of the originator, amount of the payment order, date of the payment order, any payment instructions, identity of the beneficiary's institution, beneficiary (any of these: name, address, account numbers or others).
- **Non-Established Member Information:** name and address of the originator, amount/date of the payment order, any payment instructions, identity of the beneficiary's institution, beneficiary (any of these: name, address, account numbers or others), name/address of the person placing the order, type of identification reviewed, number of identification document, TIN, SSN, EIN, AIN, Passport number and country of issuance. Everything needs to be CURRENT.

Recordkeeping Requirements: records must be retained for a period of five years (or longer if state law requires it). May be retained as originals, copies, and/or electronic records.

Fund Transfers + OFAC List: financial institutions are required to check all new wire transfer originators and beneficiaries against the OFAC list. Both incoming and outgoing wires.

Bella will not be accepting cash deposits so a CTR would not be necessary. Bella also does not currently support wires.

REPORTING: Suspicious Activity Report (SAR).

Structuring (federal crime): spacing of transactions for illicit purposes.

All financial institution staff need to be alert to anything that may seem suspicious or out of the ordinary. When in doubt, report it immediately.

For Bella this would be deposits outside of the normal member interactions that also fall under the 10,000 mark. That is called stacking or structuring deposits.

Safe harbor: federal law protects from civil liability to the institutions and its directors, officers, employees, and agents that make a disclosure of any possible violation of law and regulation.

Requirements

Maintain it confidential: under threat of monetary penalties. Just the designated supervisor of the department unless the situation involves a witness or a coworker. Exception: law enforcement agencies and other companies for BSA monitoring purposes. Safe Harbor can be revoked.

Provide detailed information: who, what, where, when, why, and how?

Elder Financial Exploitation: include the term in the narrative portion of all relevant SARs filed. The narrative should also include an explanation of why the institution knows, suspects, or has a reason to suspect that the activity is suspicious. The victim of elder financial exploitation should not be reported as the subject of the SAR, but all its information should be included.

These requirements are examples of why Bella has to do BAI. We need to make sure that you are educated to best help protect the members as well as Bella.

Medicare Fraud Schemes

<https://www.aarp.org/money/scams-fraud/info-10-2012/6-common-medicare-scams.html>

- Account
- Payments
- Detection

- Loss

FBI + FinCEN asked financial institutions to file a SAR and call the FBI (310) 477-6586 when they open business accounts by ***individuals that meet the following description:***

- Under 30 and attempt to open a business account.
- In the U.S. on a J-1 Visa.
- Use a state ID or passport instead of a driver's license to fulfill CIP requirements.

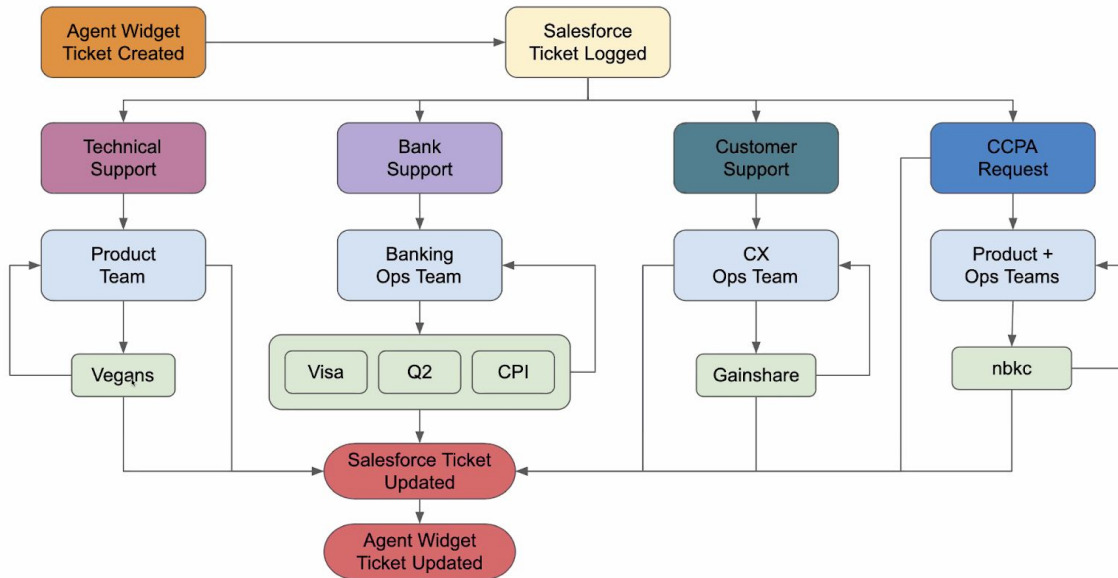
Developing a Complaint Management Policy

The role of complaint management: crucial function of any compliance management system (CMS). Provides a significant amount of data when an institution is performing a risk assessment, reviewing the effectiveness of a new product or service, and ensuring compliance with regulations.

1. Define what the institution considers a complaint: learn how to distinguish between legitimate from frivolous complaints.
2. Implement an escalation process for complaints: to ensure that the consumer receives appropriate attention and an adequate response from management.
3. Designate a centralized point of contact: to ensure that members receive a consistent and fair response from the institution.
4. Use a complaint log: nature of the complaint, date when the complaint was received, how the complaint was resolved, the root cause of the complaint, length of time to resolve the complaint, who resolved the complaint, the complainant's name, how the complaint was received (email, social media, regulatory agency, etc).
5. Ensure timely responses: to show both the complainants and regulatory agencies that complaint management is important to the institution.
6. Define how the institution will analyze complaints for trends and patterns: identify situations that indicate weaknesses in the CMS program that may lead to consumer harm or compliance violations (fair lending concerns, unfair/deceptive/abusive acts or practices concerns, issues related to a specific employee or department, system processing issues).
7. Report results to senior management and the board of directors: the complaint log, along with any supporting analysis, should be submitted regularly to the senior management and the board of directors for review.

What does this process look like for Bella?

Ticket Processing



Members will receive a response in 24hrs for non-urgent questions and provide updates. For urgent (like tech issues with the app down) it could be less but depends on the situation.

Card mail time: 7-10 business days.

You cannot currently rush a Bella card.

Unfair, Deceptive, and Abusive Acts or Practices (UDAAP): Mitigation Risk

Financial institutions (and its employees) have the legal obligation to protect their consumers from UDAAPs.

This can cause:

- Substantial financial injury to members.
- Destroy consumer's confidence in financial institutions.
- Damage the financial marketplace.

Dodd-Frank Wall Street Reform + Consumer Protection Act: it is unlawful to engage in UDAAPs.

Consumer Financial Protection Bureau: creates and enforces rules to prevent UDAAPs.

Unfair Acts & Practices

- *It causes or is likely to cause substantial injury to consumers:* monetary harm, fees of an unfair practice, even if it's a small amount of harm to a large number of people.
- *The injury is not reasonably avoidable by consumers:* when the act/practice interferes with the consumer's ability to make an informed decision or to take action to avoid injury. Like pricing information is missing from an advertisement.
- *The injury is not outweighed by any benefits to consumers:* if the net of an act/practice results in harm to consumers. (e.g. when an account boasts 'no annual fees' but requires other fees and charges that outweigh this benefit).

Examples

- Refusing to release lien after the consumer makes their final payment.
- Dishonoring credit card convenience checks without notice.
- Processing payments for companies engaged in fraudulent activities.

Deceptive Acts/Practices

- The act or practice misleads or is likely to mislead consumers: by representation or by omission (e.g. offering fee structures that are not truly available).
- A reasonable consumer would be misled: consumer's interpretation of the omission, representation, act, or practice.
- The misleading act or practice is material: likely to affect the consumer's choice or conduct regarding the product or service. Material: costs, benefits, restrictions.

Examples

- Inadequate disclosure of material lease terms in television advertising.
- Misrepresentation of loan terms.

Abusive Acts/Practices

- Materially interferes with the ability of a consumer to understand a term or condition of a consumer financial product or service.
- Takes unreasonable advantage of the consumer: 1) Lack of understanding by the consumer of the material risks, costs, or conditions of the product/service. 2) Inability of the consumer to protect their interest in selecting or using a financial product or service. 3) The reasonable reliance by the consumer on a covered person to act in the interest of the consumer.

Other Laws: TILA, TISA, ECOA, FHA, FDCPA, FCRA.

TILA (Regulation Z): specific disclosure and advertisement requirements for consumer lending. Amendment: lenders need to consider a consumer's ability to repay (ATR) when underwriting mortgages. Loan terms need to be understandable, not unfair, not deceptive, not abusive.

ECOA: prohibits discrimination of a credit transaction against a consumer based on race, religion, color, national origin, sex, marital status, age, income, or has exercised their right under the CCPA.

FHA: prohibits creditors involved in a residential real estate transaction from discriminating against a consumer based on race, color, religion, sex, disability, familial status, or national origin.

Mitigating UDAAP Risk.

- Compliance Self-Assessment: UDAAPs can occur at any stage of the credit lifecycle - Sales & MKT, Underwriting and Account Origination, Account Management and Loan Servicing, and Collections.
- Institutions should ask themselves:
 - How is the selection process handled?
 - Are consumers given a choice of products and services?
 - What happens if new and more beneficial products are introduced after consumers are already utilizing a more expensive option?
 - Is the T & C of a product simple or complex?

- What acts or omissions might interfere with consumers' understanding? How will the institution measure the consumer's availability to understand?
- Know the target audience.

Consumer Complaints: to detect UDAAPs. Consumers may file complaints with the institution itself, the Better Business Bureau, the CFPB, or other entities. Through an effective complaint management system, the institution can analyze complaints for trends and review its practices to avoid UDAAP violations.

Potential Targets

- *Credit Life Insurance: the Dodd-Frank Act:* prohibits creditors from financing single-premium credit life insurance directly or indirectly with any residential mortgage loan or HELOC. These institutions should ensure that consumers are receiving sufficient information to make an informed decision as to whether this product is right for them.
- *Punitive Mortgage Loan Provisions:* include negative amortization and prepayment penalties and may also include such normal practices as certain variable rate features and balloon payments. They aren't inherently abusive but if consumers don't fully understand the risks associated with these products, it's a risk.
- *ATM and Overdraft Fees:* institutions generally cannot overcharge fees without a member's prior authorization. Outrageous fees could expose the institution to UDAAP scrutiny.
- *Third-Party Products:* like credit protection or identity monitoring offered by a third party vendor for a monthly fee/membership. The institution is responsible for it anyways.

MKT Programs, Advertisements, and Other Promotions need to:

- All representations are factually based.
- Disclosures are clear and conspicuous and include costs, benefits, availability, fees, penalties, and other T&Cs.
- Inform members with key terms that are important to make an informed decision.
- Avoid terms that are generally not available to the target audience.
- Costs, conditions, and other terms are not misrepresented, either explicitly or by omission.

Fee Income and Compensation Models: it's not forbidden but they shouldn't be a temptation to deceive or mislead consumers. They can be reviewed to determine if the fee income was earned abusively (from overdrafts or prepayment penalties).

Debt Collection and Credit Reporting: financial institutions may also be held responsible for unfair, deceptive, or abusive debt collection acts or practices (including by third-party collectors).

Regulation CC: Essentials

Federal Reserve Board

Expedited Funds Availability Act (EFAA): enacted by the Congress in 1987.

Before Regulation CC: financial institutions could delay the availability of funds for a deposit for any length of time and had no legal obligation to inform members when they would be able to access their money.

EFAA and Regulation CC: Congress established the EFAA implemented by the Federal Reserve Board's Regulation CC, to apply both consumer and commercial transactions accounts. Regulation CC does not cover savings, money market, or time deposit accounts.

(3) major provisions to protect depositors and financial institutions:

- Limit the length of time for holds placed on deposits.
- Disclose specific availability policies in a timely manner.
- Accrue interest on unavailable funds deposited to an interest-bearing account, no later than the business day the institution receives credit for the funds.

Regulation CC specifies the business day by which each type of deposit must become available to the depositor for withdrawal. It's up to each financial institution to implement its own funds availability policy that falls within these limits.

How to disclose the funds availability policy:

v2 - 11/30/2020

page 94

- Lobbies of all branches.
- Where deposits are accepted including ATMs.
- On the front of the preprinted deposit slips.
- At the time of account opening in a manner that the member can keep.

Next Day Availability - the following types of deposits must be made available on the next business day following the day of deposit.

- *Cash*: that's deposited in person to an employee of the financial institution.
- Electronic payments: on the next business day following receipt (no the day the transfer is sent).
- *U.S. Treasury checks*: regardless of the method of deposit.
- *U.S. Postal Service money orders*: that are deposited in person to an employee of the financial institution and into an account held by the payee.
- *Federal Home Loan Bank or Federal Reserve Bank checks*: that are deposited in person to an employee of the financial institution and into an account held by the payee.
- *State or local government checks*: that are deposited in person to an employee of the financial institution and into an account held by the payee. Please note that some financial institutions may also require the use of a special deposit slip to receive next-day availability.
- *Cashier's, certified, teller's checks*: that are deposited in person to an employee of the financial institution and into account held by the payee. Please note that some financial institutions may also require the use of a special deposit slip to receive next-day availability.
- *On-us checks*: drawn on and deposited into accounts at the same financial institution. On-us checks must be deposited in person to an employee of the institution or at an on-site ATM to receive next-day availability.

Two-Day Availability - deposits made at nonproprietary ATMs must be made available by the fifth business day.

Delaying the Availability of Funds.

- *Case-by-Case Holds*: the first \$225 of the held deposit must be made available by the next business day.
- *Exception Holds*: when it represents a higher level of risk to the financial institution, for a “reasonable period of time” (typically defined as one additional business day for on-us checks - total of 2 business days) and five additional business days for other checks (total of seven business days). No applicable to cash and electronic payments.
 - *New Accounts*: present an unknown degree of risk. An account is considered new if each individual on the account has not had a transaction account at the institution within the previous 30 days, for a period of at least 30 days. For new members, only the first \$5525 of next-day items qualifies for next-day availability. The amount over \$5525 must be made available by the ninth business day after the day of deposit. For other check deposits, a financial institution may decide on any availability schedule.
 - *Large Deposits*: when it exceeds \$5525 the over amount may be held according to the “reasonable” timelines.
 - *Redeposited Checks*: when a check is returned and then redeposited, there is a greater risk to the financial institution of the funds being uncollectible a second time. The full amount of the deposited item may be held according to the timelines. Doesn't apply to a check that was re-deposited because it was returned due to a missing endorsement or because it was postdated.
 - *Repeat Overdraft Accounts*: an account must be overdrawn or would have been overdrawn if checks had not been returned - 1) for six or more business days during the previous six months; 2) by at least \$5525 on two or more business days in the past six months.
 - *Reasonable Cause to Doubt Collectibility*: because the check is more than six months old or because the paying institution has sent a stop payment notice.
 - *Emergency Conditions*: rarely used. Checks that are deposited during situations outside the financial institution's control (power

failure, natural disaster). May be held for any length of time as long as the institution can justify the hold.

Notifications for Holds on Deposits: the account holder must be notified in writing. At the time of deposit or mailed or delivered no later than the first business day following the banking day the deposit was made.

We have other options like the discretionary and emergency fund so would a hold ever be an issue? We would want to take into account the type of hold that is on the account and reach out to ask if there are any other outside the box solutions.

Reg E: Handling Errors and Complaints

This is all being handled by VISA please see VISA section for more information.

Financial institutions have ten (10) business days to investigate an error or complaint.

**Written notifications are not required.*

- *EFT Education:* familiarise yourself with different types of EFTs handled by the institution so we know when an error/complaint comes under the jurisdiction of Reg E.
- *Recognize Errors:* so they get logged/investigated within the permitted timeframes.
- *Reg E Contact or Department:* know who's in charge of Reg E error resolution at your institution. This person/department will log the EFT error, begin the investigation immediately, and ensure that action is taken and communicated in the permitted timeframes.
- *Oral Notice:* don't wait for written notice.

What is an error?

- Unauthorized EFT.
- Incorrect EFT.
- Omission of EFT on a Periodic statement.
- Computer or bookkeeping errors.

- Wrong amount of money issued at an electronic terminal.
- Improper Identification of EFT.

What is not an EFT Error? (these situations don't require investigation).

- Routine Balance Inquiries: e.g. verification of account balance.
- Routine Complaints: e.g. complaint about fees for being too expensive.
- Duplicate Document Requests: e.g. someone asks for copies of statements twice.
- Consumer Requests for Tax or Recordkeeping Purposes.

Reg E Contact or Department: most financial institutions have either one person or a central group to handle potential errors and complaints, to guarantee that errors are properly recorded, tracked, and processed in the required timeframes.

EFT Error Log: the contact/group should be responsible for maintaining a log of all EFT errors and alleged EFT errors. The should capture:

- The individual, office, or department handling the complaint.
- The individual assigned to investigate the error.
- The date the error, notification, or complaint was received.
- Whether the deadlines for error resolution were met.

Most financial institutions used a standardized Reg E inquiry/complaint form.

What consumers must report: must provide the institution with enough information to identify the account and the name on the account. If the actual account number is not provided, a SSN or some other unique identifier is enough. Consumers must provide as much detail as possible about the suspected error, such as the amount involved and the date it occurred.

Liability and Consumer Reporting Timeframes: the financial institution must receive the allegation of error no more than 60 days after the institution issued the periodic statement containing the error. For payroll card accounts, an error report is 'timely' when it's made within 60 days of either:

- The date the consumer accesses the EFT history that includes the disputed transaction.
- The date the financial institution sends the written history that includes the disputed transaction.

**Financial institutions must investigate all error allegations related to unauthorized transactions before imposing any liability.*

EFT Error Investigation Timelines.

- *When an account is not provisionally credited:* must promptly investigate any alleged error and reveal the findings within 10 business days of being notified of the error. It should be corrected no more than 1 business day later. The institution must report the results of its investigation to the consumer within 3 business days of concluding the investigation.
- *When an account is provisionally credited:* the institution may take 45 calendar days to investigate an error only if it meets the following requirements 1) the consumer's account is provisionally credited for the disputed amount within 10 business days. 2) The consumer has access to provisionally credited money during the investigation. 3) Within 2 business days of the provisional credit, the consumer must be notified (orally or in writing) of the amount, the date of the credit and the fact that the consumer does have access to those funds during the length of the investigation.
- *Foreign and POS Debit Card Transactions:* financial institutions have more time to investigate if: 1) An EFT was not initiated in a state (PR, District of Columbia, or any territory or possession of the U.S.) 2) It's a POS card transaction. It may take up to 90 calendar days if it provisionally credits the consumer's account with the disputed amount within 10 business days.
- *Transactions Involving a New Account:* within 30 days of the first deposit to the affected account, the institution must determine whether or not an error occurred within 20 business days of receipt of the notice. For new accounts disputes, a 90-calendar-day period applies for the investigation if the institution provisionally credits the consumer's account within 20

business days. The institution must disclose this information to the consumer.

- Transactions Involving Extensions of Credit: Reg Z (Truth in Lending) billing error resolution requirements may apply - if a transaction has both EFT and credit aspects, then Reg E controls the transaction, and Reg Z applies only to the credit-related aspects of the situation that Reg E doesn't cover. (e.g. \$20 withdrawal and receiving \$200 causing an overdraft - extension of credit).

EFT Error Investigation FAQs

What if your institution requires written confirmation?

If the consumer fails to respond to that request within 10 business days, the institution can take 45 calendar days and not provisionally credit the consumer's account.

If there's a dispute about a POS, foreign, or new account transaction, and if written confirmation is not received, an institution can take 90 calendar days to investigate without provisionally crediting the account for the dispute amount.

Two requirements (or they might be violating Reg E):

1. The consumer must be informed of the written confirmation requirement at the time "notice" is given. And provide the address of where to send it.
2. A consumer's written notice should be considered "given" at the time the consumer mails the notice or delivers it to the institution.

What if the consumer was wrong and the account was already provisionally credited?

No error is discovered within the 45-day timeframe, an institution may remove the funds from the member's account but must notify the consumer of the date and the amount to be removed.

For 5 business days, the institution can't charge an overdraft fee but after that period, your institution can refuse POS transactions and charge the fee.

If during the 5 business days after transmitting the notice, the consumer attempts a transaction that would have resulted in an overdraft even if the credited funds were still on deposit, then your institution doesn't have to honor the transaction.

What if a consumer withdraws an error?

If a consumer withdraws a notice of error before the investigation is completed, the institution should mark these withdrawals clearly in the institution's records.

If proper documentation is not carried out, it may appear that the institution has violated Reg E by failing to properly conclude the investigation.

Communicating the Results of the Investigation.

It should be communicated to the consumer and the Reg E contact or department (if the investigation was handled by another individual). With sufficient internal documentation.

Investigation Findings: the consumer shall be given a written explanation of the findings noting the right to request documentation used to make the determination. If requested, it should be provided promptly.

Error Investigations and Third-Party Records: an institution is required to investigate an error only as far as it can by using its own records. Institutions are not required to obtain records from third parties to determine what may have happened.

Frontline: Marketing & Social Media

Marketing & Advertising

Advertising is the type of marketing that is regulated for the protection of consumers, both in a general sense and specifically for financial products.

As frontline employees, it is important to be familiar with the advertisements that bring members and what actions might be taken as advertising.

We should be able to:

- Answer questions and make an initial response to complaints about advertising.
- Direct consumers to the right person or resource for more information about advertised products.

Avoiding UDAAP

Unfair Advertising:

- It is likely to cause substantial monetary losses; to any number of individuals, or a smaller loss to a substantial number of individuals.
- The loss cannot reasonably be avoided, perhaps because a key disclosure was left out of an advertisement.
- The loss is not outweighed by a related gain.

Deceptive Advertising:

- It is misleading to a reasonable consumer. The consumer's interpretation is more important than the advertiser's intention (e.g. an exaggeration).
- The advertisement is likely to affect an actual choice regarding a product or service.

Abusive Advertising:

- Interferes with the consumer's ability to understand the terms and conditions of the product.
- Takes advantage of the consumer's lack of understanding of the risks or potential costs of the product, and their trust in the advertiser to act on his/her best interest.

Prohibited Ads:

- *Bait and Switch*: deceives members into believing that they will be able to get a better deal than they can in fact receive.
- *No-cost or Free Accounts*: even though activity fees or maintenance fees are nonexistent, they can get charged for check reorders fees, non-sufficient funds fees, or dormancy fees.
- *Profit on Accounts*: the word "profit" cannot be used to characterize interest or earnings on an account.

Triggering Terms for Deposit Accounts: using them triggers the inclusion of additional explanations or disclosures.

- Annual Percentage Yield (APY) - triggers a requirement that the following must be shown clearly and conspicuously in the advertisement:
 - The period of time of the APY is in effect, or a statement that the APY is accurate as of a specified date.
 - Any minimum balance required to earn the advertised APY, as well as the minimum balance to open the account (if it is greater).
 - A statement that fees could reduce earnings on the account.
 - For **time accounts**, the length of time the account must be open to earn the advertised APY, as well as a statement noting that an early withdrawal penalty may or will be imposed.
 - For **variable rate accounts**, a statement that the rate may change after the account is opened.
 - For **tiered accounts paying different rates** depending on the account balance, the minimum balance for each tier must be shown near and with equal prominence to the applicable APY.

- **Bonus** - if a bonus premium, gift, award, or other consideration worth over \$10 in cost to the institution is advertised, it must include:
 - The APY.
 - Any minimum balance requirements, either for opening or maintaining the account, that are required to receive the bonus.
 - Any time requirement to receive the bonus.
 - When the bonus will be provided.

- **Overdraft Protection** - does not apply to arrangements to transfer funds from another deposit account or a formal overdraft line of credit, even if a fee is charged for such transfers (e.g. a savings account linked to a checking account is overdrawn, so funds are automatically transferred from the savings account to cover the difference) .It must include:
 - The fee or fees charged for paying each overdraft.

- The categories of transaction (check, pre-authorized debit, etc) that can lead to an overdraft fee.
 - The time period by which the consumer must repay any overdraft.
 - Any exclusions when overdraft protection will not be paid.
- **Exceptions** - lawmakers realize there is not always enough time or space in an advertisement to include all of these disclosures.
 - Broadcast media (TV, radio), outdoor billboards, telephone response machines, and signs inside a depository institution, may have exceptions to these rules.
 - Online advertisements or sent by email are considered equivalent to written advertisements, since consumers have time to review all required disclosures.
 - When the electronic advertisement is done through audio or video, printable disclosures may still be linked to the advertisements.

Phone, Email, and Social Media.

- **Phone and email Solicitation:**
 - **Do Not Call:**
 - You cannot solicit by calling personal phone numbers, including cell phone numbers, that are on the registry.
 - “Robocalls” may not be made without prior express written consent from the consumer. They must include an automated, interactive opt-out feature enabling consumers to immediately end such calls.
 - The financial institution must maintain a list of do-not-call numbers that includes the National Do-Not-Call registry, any similar State registry, and any consumers who have personally asked to be excluded from phone solicitation. The financial institution is responsible for checking the official lists for additions and changes at least every 31 days.

Contact Center: Handling Complaints

Identifying Complaints

- **Written:** can be a letter or email sent by a consumer to the financial institution. Letters are often addressed to retail branches since they have the most consumer contact. Complaints may also be included in payment envelopes. Employees who monitor general email inboxes should review emails for complaints and know the process for reporting them.
- **Verbal:** contact centers, loan servicing personnel, and branch employees are some of the most frequently contacted groups in the institution. All staff members should be aware of what constitutes a legitimate complaint and the process for reporting such complaints to management.
- **Regulatory agencies:** consumers can easily log complaints on the CFPB website, which are then available for public review by institution name. Complaints received through other regulatory agencies are logged within that agency but are not publicly available. Any complaints received by a regulatory agency during an examination period will be considered and can affect the exam rating and/or compliance findings of an institution.
- **Social Media and Internet:** as Facebook and Twitter, and review websites such as Yelp or the Better Business Bureau, can be a channel for consumers to voice complaints. Even if an institution has a “no social media” policy, it’s still in the institution’s best interest to monitor social media sites, as employees and consumers alike can post information relating to the institution.

Complaints, Disputes, or Feedback

- Determine the urgency of response by identifying if it is a complaint, a dispute, or just negative feedback.
- *Complaints:* demands a response in a certain manner. Can be logged/used for analyzing trends by your leadership, or they can mean serious consequences for the institution. Can revolve around a product or service not functioning like it’s supposed to or can be as severe as discriminatory behaviour.

- *Disputes*: if a consumer finds an error, disagrees with billing, or disagrees with your institution's filing with a consumer reporting agency, he or she may initiate a dispute. For borrowers, this is important because inaccurate consumer reports may affect their ability to obtain credit, get an apartment, or even a job that requires a credit report.
- *Negative Feedback*: the institution has done nothing wrong, or the error has little consequence on the consumer.

Complaint Management

- *Implement an escalation process*: to define how complaints will move up the command chain to ensure that the consumer receives appropriate attention and an adequate response from management.
- *Designate a centralized point of contact*: to ensure consumers receive a consistent and fair response from the institution.
- *Utilize a complaint log*: during a compliance examination, examiners will often review a complaint log as part of the overall CMS assessment.
- *Ensure timely responses*: to show both the complainants and regulatory agencies that complaint management is important to your institution.
- **Discussions with the Consumer**
 - Listen.
 - Be empathetic.
 - Ask questions.
 - Provide support

Reg D: Convenient Withdrawals

Places restrictions on the timing and number of withdrawals from certain types of accounts. Frontline employees need to be able to explain these restrictions to consumers in order to provide the highest level of service.

Imposes reserve requirements on certain deposits and other liabilities of depository institutions solely for the purpose of implementing monetary policy.

Transaction Limits on Savings Deposit Accounts

Reg D places a limit of six “convenient” withdrawals or transfers per month that a depositor can make on savings deposit accounts.

Saving deposit accounts:

- Money market deposit accounts (MMDAs).
- Share accounts at credit unions.
- Passbook savings accounts.
- Statement savings accounts.

Convenient (the depositor can conduct them with very minimal effort) transfers and withdrawals include:

- Preauthorized, automatic transfers.
- Transfers and withdrawals initiated by telephone, facsimile, or computer, and transfers made by check, debit card, or other similar order made by the depositor and payable to third parties.

Standard withdrawals are sometimes referred to as “inconvenient” or less convenient withdrawals because they require more effort of the consumer. They include:

- Withdrawals made by email, messenger, ATM, or in person.
- Withdrawals made by telephone when a check is mailed to the account holder.
- Transfers made by mail, messenger, ATM, in person, or automatically for repaying loans at the same financial institution where the consumer holds the savings deposit account.

Exceeding Convenient Transaction Limits: if a consumer exceeds his or her monthly transaction limits on a savings deposit account, the financial institution may charge a penalty fee. If the consumer continues to exceed the transaction limits on his or her account, the financial institution must either transfer the funds to another type of account or close the account.

SAR: Responding to the Suspicious Activity

You have the duty to carefully examine the actions of members.

FAQs

How can I tell if something is suspicious?

Anything you believe is strange or out of the ordinary.

Are there any legal protections for my institution?

Federal law provides protection from civil liability for filing a SAR (safe harbor). Your institution can elect to file a report in good faith even when doing so is not required. It will not be liable under any state or federal statute.

Who can know about a SAR filing?

SARs are considered confidential and may not be revealed to outsiders under threat of civil monetary penalties. The exception is law enforcement agencies; they obviously will need this information when investigating the suspicious activity, so your institution can share SARs with the relevant authorities.

Recognizing Suspicious Activity

Report Known or Suspected Violations: the motives behind suspicious activity are often criminal. The various federal banking regulators and the Treasury Department have enacted rules which require you and your institution to document and report any known or suspected criminal violation:

- Committed or attempted against the institution.
- Conducted through the institution.
- Involving circumvention of reporting requirements in the Bank Secrecy Act (BSA).
- Involving money laundering.

Situations that require a SAR filing:

- Frequent foreign currency transactions for unusual amounts.
- Two members arriving together and depositing a combined amount of \$10,000
- Bribe attempts or threats.
- Frequent wire transfers for unusual amounts..

- Attempt to avoid reporting requirements.
- Frequent transfers of large amounts to money-laundering havens.

New Accounts Reps should beware of:

- Member's permanent address outside of the U.S.
- Member's telephone number is no longer in service.
- Members are unwilling to provide personal background information he/she/they want to open a bank account.
- Business member is hesitant to give details about his/her business activities.
- Business member is hesitant to provide financial statements/documents.

BSA states that **you must file a SAR when** you suspect a transaction is conducted or attempted by, at, or through an institution involving or totaling \$5,000 in funds, and the institution has reason to know or suspect that:

- The transaction involves funds derived from illegal activities or is conducted to launder money.
- The transaction has no business or apparent lawful purpose or isn't the type of business that the member is usually involved with.
- The member's transaction is designated to evade any requirement of BSA, including CTR rules.
- Suspicious activity aggregating \$5,000 or more when a suspect can be identified.
- Suspicious activity aggregating \$25,000 or more regardless of knowledge of a suspect.
- Suspicious activity aggregating \$5,000 or more that involves potential money laundering or violations of the Bank Secrecy Act.
- But also of an **insider**: employee, officer, director or agent of the institution.

Commercial Real Estate Fraud

Commercial Real Estate Fraud Analysis and Advisory (by FinCEN): to provide examples of common commercial real estate fraud schemes, and suggests financial institutions use the term "CREF" when completing SAR narratives involving potential commercial real estate fraud.

Non-Bank Residential Mortgage Lenders: also must have anti-money laundering (AML) programs in place and file SARs when they encounter suspicious activity.

Types of Mortgage Loan Fraud

- **Occupancy fraud:** to gain more favorable lending rates, borrowers claim that vacation or investment properties will be their primary residences. This fraud also occurs when borrowers apply for loans for a primary residence that other people (e.g. family members) will occupy.
- **Appraisal fraud:** this can take the form of either overstating the home value to obtain more money from a sale or cash-out financing, or understating home values to purchase property at a steep discount.
- **Income Fraud:** borrowers overstate income to qualify for larger mortgages or understate income to qualify for hardship concessions.
- **Employment Fraud:** this encompasses any misrepresentation of a borrower's employment status, including identity of employer, length of employment, unemployment status, and whether the borrower is an independent contractor or business owner.
- **Liability Fraud:** borrowers try to hide significant financial liabilities such as car loans, other mortgages, or student loans from lenders to make their loan applications more attractive.
- **Debt Elimination Schemes:** any scheme that charges borrowers for invalid or illegal documents that claim to invalidate a mortgage or account balances.
- **Foreclosure Rescue Scams:** these deceptions attempt to convince distressed homeowners that they can avoid foreclosure by transferring the title of their home to the scammer or making monthly mortgage payments to the scammer rather than the actual mortgage holder.
- **Identity Theft:** involves using a SSN card or any other form of government-issued identification so that the thief can assume someone else's identity in the mortgage loan process.
- **Home Equity Conversion Mortgage (HECM):** seniors are targeted in order to coerce them into turning over their titles to scammers in "reverse mortgage" scams.

Red Flags for Mortgage Fraud: FinCEN has identified numerous red flags that lenders need to be alert for. Lenders should pay attention to:

- The submission of invalid documents to cancel mortgage obligations or pay off a loan balance.
- The same notary and/or "authorized representative" preparing, signing, and sending packages of nearly identical debt elimination documents for multiple borrowers.
- The same notary and/or "unauthorized representative" working with an unusually large number of borrowers.
- Falsification of certified checks or cashier's checks drawn against borrower's account rather than the account of a financial institution.
- Borrowers who do not reside in a property purchased as a "primary residence".
- Younger borrowers whose primary purchase mortgage is for a property in a senior citizen residential development.

- When public and personal documents indicate that borrowers reside at a different location than the address listed on the loan application.
- When language is included in a short sale contract that indicates the property could be resold promptly in a possible violation of FHA regulations.
- Low appraisals and non-arm's length relationships between short sell buyers and sellers.
- The agent of the buyer and/or seller is not licensed.
- Past misrepresentations made by borrowers in previous attempts to secure funding.
- Improper/incomplete file documentation and borrowers reluctant to provide more information or who break promises to do so.
- The resubmission of a rejected loan application with key borrower details changed from an individual to a company/corporation.
- Attempts by borrowers to structure currency deposits/withdrawals or disguise the true value of assets in order to qualify for loan modification programs for distressed borrowers.
- Requests from third parties on behalf of distressed homeowners to pay fees in advance of the homeowners receiving mortgage counseling, foreclosure avoidance, loan modifications, and other services.
- Third parties who may claim to be associated with the U.S. government and whose solicitations of distressed homeowners include mortgage counseling, foreclosure avoidance, loan modifications, or other related services.

Tax Refund Fraud

When completing SARs on suspected tax refund fraud, financial institutions should use the term "tax refund fraud" in the narrative section of the SAR and provide a detailed description of the activity.

Third-Party Payment Processors

Non-bank, or third-party, payment processors provide payment processing services to merchants and other businesses. Typically, they initiate transactions on behalf of merchant clients that do not have a direct relationship with the payment processor's financial institution. Payment processors use their own deposit accounts at a financial institution to process such transactions and sometimes establish deposit accounts at the financial institution in the names of their merchant clients. It covers:

- Credit card payments.
- Automated Clearing House (ACH) debits.
- Creating and depositing remotely-created checks (RCCs) or "demand drafts".

Risk Assessment for Third-Party Processors.

They present a risk to the payment system by making it vulnerable to money laundering, identity theft, fraud schemes, and illicit transactions. Their risk profile can vary significantly depending on the composition of their member base.

Due Diligence for Third-Party Processors.

- **Due Diligence:** financial institutions should conduct thorough initial and ongoing due diligence to determine whether external investigation or legal actions are pending against a payment processor or its owners and operators. They should also determine whether payment processors have obtained all necessary state licenses, registrations, and approvals.
- **Filing a SAR** - if they know, suspect, or have reason to suspect that a payment processor has:
 - Conducted a transaction involving funds from illegal activity.
 - Tried to disguise funds derived from illegal activity.
 - Tried to engage in transactions designed to evade BSA regulations or that lack a legitimate business or apparent lawful purpose.
- **The SAR Form:** 1) Check the appropriate box on the SAR form to indicate the type of suspicious activity. 2) Include the term "Payment Processor" in both the narrative and portion and the subject occupation portions of the SAR.

Medicare Fraud Schemes

- File a SAR and Call the FBI.
- Record Identifying Information: photographs of the person opening the account and anyone who accompanies him/her. If possible, record pictures of their car as well. Maintain copies of the ID or passport if you suspect that these documents might be fraudulent.

Funnel Accounts and Trade-based Money Laundering

Drug cartels have started using funnel accounts and trade-based money laundering (TBML) to move drug profits across country borders.

1. A business owner, who is colluding with the cartel, opens a business account in one state.
2. Members of the cartel start depositing cash from drug deals into the account in different states.
3. The business owner then uses the money to purchase goods and shops those goods to the cartel's home country.

4. Once the goods are in the new country, they are sold off, and the cartel pockets the proceeds. The money has now been laundered and sent across the border.

Red Flags for Funnel Accounts and TBML:

- Business accounts that receive multiple cash deposits from states where the company does not operate.
- People who make cash deposits into business accounts but do not seem to have knowledge of the business's purpose or activities.
- Debits on a business account that do not make sense, given the nature of the business (e.g. a produce company writes checks to a textile manufacturer).
- Checks being deposited into an account with different handwriting on the payee and amount lines than the signature lines. This is a sign that the checks were pre-signed and then handed over to the cartel, which then filled out the payee and amounts.

Human Trafficking and Human Smuggling

The red flags include:

- Multiple wire transfers to a common beneficiary located in a region with high migrant populations and/or significant economic/civic turmoil.
- Frequent transfers to or transactions with beneficiaries located on or near the U.S. border.
- Members receiving wire transfers from countries with high migrant populations, but who are not nationals of those countries.

Signs of victims being economically exploited:

- A business member that has virtually no payroll or a payroll much lower than expected given the size of the business.
- A business member making substantial deductions to its employees' wages.
- A consumer, escorted by a third party, making a large wire transfer that appears to be most or all of his/her salary.
- Frequent payments to online escort services for advertising.
- Frequent transactions by business members for food, lodging, and transportation to apparently provide sustenance to individuals.
- Payments to employment or recruitment agencies that are not licensed or registered, or that have labor violations.
- Apparently unrelated personal accounts having the same signers or custodians.

- Accounts of foreign workers or students where the employer or employment agency serves as a custodian.

Reporting Human Trafficking and Human Smuggling: make sure to use the term “Advisory Human Smuggling” and/or “Advisory Human Trafficking” in the narrative portion of the SAR. Do not report the potential victim of smuggling or trafficking as the subject of the SAR.

Filling Out and Filing the SAR

Time restrictions: financial institutions are required to file a SAR no later than 30 calendar days after the date they initially detect suspicious activity. Another 30 calendar days may be added to that deadline (for a total of 60 days max) if a suspect is not apparent and the financial institution attempts to determine his/her identity.

Five Simple and Separate Parts

- I. Subject Information.
- II. Suspicious Activity Information.
- III. Financial Institution Where Activity Occurred.
- IV. Filing Institution Contact Information.
- V. Narrative

After your supervisor completes the SAR, it is electronically filed to FinCEN.

The SAR Form

- **Home Page:** asks you to indicate whether you are filing an initial, corrected/amended, or continuing activity report.
- **Subject Information:** asks for any information you have about the suspects including suspicious activity involving institution employees.
- **Suspicious Activity Information:** asks for the date/date range of the activity, characterization of the activity and the dollar amount involved.
- **Financial Institution Where Activity Occurred:** asks for descriptive details of your institution such as full legal name, address, EIN, and primary regulator. You’re also asked to give any account numbers affected by the activity.
- **Filing Institution Contact Information:** asks for the date the report was prepared. The contact person should have specific knowledge of the activity and also any law enforcement agency you contacted.

- **Narrative:** it includes space to provide detailed explanation of the suspicious activity (agents rely on your narrative to make investigative decisions). Give a clear, chronological account of the suspicious activity and dollar amount(s) involved. Also describe any changes that are being made to a previously filed report.

Three (3) Points to Keep in Mind

- **Attachments:** Excel-compatible comma separated value (CSV) file, no more than one megabyte. Explain in the narrative section.
- **Recordkeeping:** file the SAR and its documentation in a safe place for a period of five years from the date of the report (e.g. spreadsheets of account activities, photocopies of canceled checks and account statements, and surveillance photos)
- **Confidentiality:** no bank or other financial institution, and no director, officer, employee or agent of any bank or other financial institution, who reports a suspicious transaction under this part, may notify any person involved in the transaction that the transaction has been reported”.

BELLA Dictionary

General Banking Terms

Bella Terms + Partners

Bella Partners

Drive Wealth

With our global full-stack, cloud-based, and API-driven solutions, we power new, cutting-edge, and innovative investment experiences around the world every day. By embedding investing into new and existing digital experiences, our global partners turn consumers into investors. Buying Starbucks stock suddenly becomes as simple as buying a latte.

NBKC

National Bank Kansas City: Banking Licence.

PLAID

Plaid is an API that connects thousands of financial institutions to their clients and their accounts.
<https://plaid.com/what-is-plaid/>

Q2

We create simple, smart, end-to-end banking and lending experiences that position you as an indispensable partner on your members' financial journeys. (Connects Bella to their licencing partner NBKC)

Socure

Identity verification services. Leader in high-assurance digital identity verification. Predictive analytics platform applies AI & machine learning to authenticate identities in real-time

Stonecastle

StoneCastle connects investors to depository institutions via innovative investment and cash management solutions.

Treliant

With our deep knowledge of the federal and state regulatory systems, Treliant is exceptionally well equipped to guide clients through regulatory expectations for safety and soundness, Bank Secrecy Act (BSA)/Anti-Money Laundering (AML) and consumer compliance challenges, along with those pertaining to conduct and culture, conflicts of interest, market manipulation, and Unfair, Deceptive or Abusive Acts or Practices (UDAAP).

UX / UI

User Experience / User Interface

User interface design or user interface engineering is the design of user interfaces for machines and software, such as computers, home appliances, mobile devices, and other electronic devices,

with the focus on maximizing usability and the user experience.

Vegan/S - Vegan Solutions

IT and Digital Service (App, Backend, and Frontend developers of the Bella systems)

VISA

Global payments technology company that connects consumers, businesses, financial institutions, and governments to fast, secure and reliable electronic payments. It facilitates electronic funds transfers throughout the world, most commonly through Visa-branded credit cards, debit cards and prepaid cards.

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Bella Terms

(i=internal)

BLINK (i)

Blink is a A debit card rewards program that incentivizes members by tapping into the heart and soul of BELLA (with a focus on giving back and community). The offerings that live under Blink are: Surprise Cashback, Karma Account, Social Impact, and the Emergency Fund.

LoveData (i)

Love Data is everything personal about our clients that they choose to tell us. With this information we will be able to be personable and make sure they know we know them and are here to take care of them.

Socratex (i)

People just want to execute their operations in the fastest and easiest way possible. Here, we think Socratex will excel, removing typical navigation menus and transforming your natural language into actions.

Today, Socratex is a very basic UX that we can elevate, together, into a compelling AI experience that maybe one day won't require a screen to use.

Squad

MXT (Member Experience Team) Our Squad is an extension of Bella. They are the voice of Bella.

General Banking Terms

Account Aggregator

Account aggregation, sometimes called financial data aggregation, lists all or most of the account holder's financial information in one place. It may include data just from that financial institution, or from multiple institutions where the account holder does business.

Application Programming Interface (API)

Application Programming Interface - It essentially refers to how multiple applications can interact with and obtain data from one another. It's a bridge or the middle infrastructure between applications.

Annual Percentage Yield (APY)

Annual percentage yield. The amount of interest you gain from keeping money in an account in a year, including compound interest.

Annual Percentage Rate (APR)

Annual percentage rate. The amount of interest you gain from keeping money in an account in a year, not including compound interest. In the context of a loan, the APR represents the cost of borrowing money.

Automated Clearing House (ACH)

Direct payments. An automated clearing house is a computer-based electronic network for processing transactions, usually domestic low value payments, between participating financial institutions. It may support both credit transfers and direct debits.

Anti-Money Laundering (AML)

Anti-money laundering (AML) refers to the laws, regulations and procedures intended to prevent criminals from disguising illegally obtained funds as legitimate income. Though anti-money laundering laws cover a limited range of transactions and criminal behavior, their implications are far-reaching.

Bank Of Secrecy Act (BSA)

The Bank Secrecy Act of 1970, also known as the Currency and Foreign Transactions Reporting Act, is a U.S. law requiring financial institutions in the United States to assist U.S. government agencies in detecting and preventing money laundering.

Banking License / Bank of Record

A banking license is a legal prerequisite for a financial institution that wants to carry on a banking business. Under the laws of most jurisdictions, a business is not permitted to carry words like a bank, insurance, national in their name, unless it holds a corresponding license. NBKC gives Bella their Banking License.

Biometrics

Biometrics are body measurements and calculations related to human characteristics. Biometrics authentication is used in computer science as a form of identification and access control.

Business To Business (B2B)

Business-to-business is a situation where one business makes a commercial transaction with another.

Business Process Outsourcing (BPO)

Business process outsourcing (BPO) is a method of subcontracting various business-related operations to third-party vendors . Although BPO originally applied solely to manufacturing entities, such as soft drink manufacturers that outsourced large segments of their supply chains, BPO now applies to the outsourcing of services, as well. Outplex is our BPO for Member Experience (MXT)

Customer to Customer (C2C)

Customer to customer (C2C) is a business model whereby members can trade with each other, typically in an online environment.

California Consumer Privacy Act (CCPA)

The California Consumer Privacy Act (CCPA) is a state-wide data privacy law that regulates how businesses all over the world are allowed to handle the personal information (PI) of California residents. <https://oag.ca.gov/privacy/ccpa> (Assembly Bill 375 (AB375))

California's Insurance Information and Privacy Protection Act

(IIPPA)

Provide protections for one's personally identifiable information, which is generally provided to an agent, broker or insurance company in order to apply for insurance or submit a claim.

Certificate of Deposit (CD)

An account into which you deposit a sum of money and agree to keep it there for a specified length of time. The account typically pays higher interest rates than standard savings and checking

v2 - 11/30/2020

page 121

accounts.

Customer Due Diligence (CDD)

Customer due diligence is the process of identifying your members and checking they are who they say they are. In practice, this means obtaining a member's name, photograph on an official document which confirms their identity and residential address and date of birth.

Customer Identification Program (CIP)

A Customer Identification Program (CIP) is a United States requirement, where financial institutions need to verify the identity of individuals wishing to conduct financial transactions with them and is a provision of the USA Patriot Act.

Card Issuer

The issuing bank, as the term goes, is a bank that issues credit and debit cards to consumers. An issuing bank, also known as issuer, is a bank or financial institution that offers payment cards to consumers on behalf of the card networks, such as Visa, MasterCard or American Express.

NKBC issues cards for Bella.

Conversational Cloud

Our asynchronous messaging platform. There are no sessions; the thread and history stays in place so you can jump back in anytime. We use the Conversational Cloud to interact with members.

Compliance

In general, compliance means conforming to a rule, such as a specification, policy, standard or law. Regulatory compliance describes the goal that organizations aspire to achieve in their efforts to ensure that they are aware of and take steps to comply with relevant laws, policies, and regulations.

Comma-Separated Values (CSV)

A comma-separated values file is a delimited text file that uses a comma to separate values. Each line of the file is a data record. Each record consists of one or more fields, separated by commas. The use of the comma as a field separator is the source of the name for this file format.

Demand Deposit Account (DDA)

A demand deposit account (DDA) consists of funds held in a bank account from which deposited funds can be withdrawn at any time, such as checking accounts. DDA accounts can pay interest on a deposit into the accounts but aren't required.

Deposit Network

[Description]

Dev Team

It consists of dedicated professionals who can develop, test, and deploy a Story, Feature, or component. The Dev Team typically includes software developers and testers, engineers, and other dedicated specialists required to complete a vertical slice of functionality.

Direct to Member (D2M)

Direct-to-consumer refers to selling products directly to members, bypassing any third-party retailers, wholesalers, or any other middlemen.

Dormant Account

A dormant account is an account that has had no financial activity for a long period of time, except for the posting of interest. Financial institutions are required by state laws to transfer resources held in dormant accounts to the state's treasury after the accounts have been dormant for a certain period of time. Bella will not have Dormant Accounts.

Dwolla

It's an United States-only e-commerce company that provides an online payment system and mobile payments network.

Electronic Fund Transfers (EFT)

Electronic funds transfer is the electronic transfer of money from one bank account to another, either within a single financial institution or across multiple institutions, via computer-based systems, without the direct intervention of bank staff.

Employee Identification Number (EIN)

The Employer Identification Number, also known as the Federal Employer Identification Number or the Federal Tax Identification Number, is a unique nine-digit number assigned by the Internal Revenue Service to business entities operating in the United States for the purposes of identification.

Equal Employment Opportunity Commission (EEOC)

The U.S. Equal Employment Opportunity Commission is a large federal agency that was established via the 1964 Civil Rights Act to administer and enforce civil rights laws against workplace discrimination.

Exchange Traded Fund (ETF)

Investment funds traded on stock exchanges, much like stocks. An ETF holds assets such as stocks, commodities, or bonds and generally operates with an arbitrage mechanism designed to keep it trading close to its net asset value, although deviations can occasionally occur.

Federal Deposit Insurance Corporation (FDIC)

The Federal Deposit Insurance Corp. A government-run organization that insures members' bank deposits up to \$250,000 if the bank fails. The National Credit Union Administration is the equivalent for credit unions.

Financial Crimes Enforcement Network (FinCen)

The Financial Crimes Enforcement Network is a bureau of the United States Department of the Treasury that collects and analyzes information about financial transactions in order to combat domestic and international money laundering, terrorist financing, and other financial crimes.

FX: FOREX

It's the marketplace where various national currencies are traded. There is no centralized location, Rather, the forex market is an electronic network of banks, brokers, institutions, and individual traders (mostly trading through brokers or banks).

Geolocations

In computing, Internet geolocation is software capable of deducing the geographic position of a device connected to the Internet. For example, the device's IP address can be used to determine the country, city, or post/ZIP code, determining an object's geographical location.

Integration

The process where laundered money has re-entered the economy, after being placed and layered.

Investment Platform

An investment platform is essentially an online service which allows you to buy, sell and hold funds. It's possible for you to do this yourself directly on a non-advised basis via a D2M (direct to member) platform, or on an advised basis using a financial adviser who will invest on your behalf.

Layering

Complex transactions to hide where the illegal funds originated.

Negotiable Instruments

Bank check, cashier's check, traveler's check, money order.

Office of Foreign Asset Control (OFAC)

The Office of Foreign Assets Control is a financial intelligence and enforcement agency of the U.S. Treasury Department. It administers and enforces economic and trade sanctions in support of U.S. national security and foreign policy objectives.

Overdraft Fee

A fee incurred when your checking account doesn't have enough funds to cover a payment that is requested. The financial institution will pay what your account lacks, after which your account may have a negative balance.

OPT OUT

The term opt-out refers to several methods by which individuals can avoid receiving unsolicited product or service information.

Personally Identifiable Information (PII)

Personally identifiable information, or PII, is any data that could potentially be used to identify a particular person. Examples include a full name, Social Security number, driver's license number, bank account number, passport number, and email address.

Placement

The process where laundered money has entered the financial institutions or the retail space.

Primary Account Number / Payment Card Number (PAN)

The number on the back of your credit or debit card.

Processor

A payment processor is a company that handles transactions so that your members can buy your products. That means the payment processing company communicates and relays information from your member's credit or debit card to both your bank and your member's bank. Visa is our debit network/processor.

Process Mapping

The practice of process mapping (closely related to value stream mapping) begins by gathering all bank employees involved in a particular process (from upper-level executives to front-line tellers) and then defining each step involved in that process.

Power of Attorney

It's a document that authorizes one person – called the agent or attorney-in-fact – to take action on behalf of another person, referred to as the principal. This means that you choose someone to take care of your financial affairs when you are incapacitated (You have to be very clear as to what incapacitated means, the clearer, the better.)

Point of Sale (POS)

The point of sale or point of purchase is the time and place where a retail transaction is completed.

Return Codes

Codes to describe an incident in ACH. Fail to process or get reversed.

Returned Item Fee

A bounced-check fee charged to the person trying to deposit the check. It can be charged if there are insufficient funds in the check writer's account or if the account is closed.

Right to Financial Privacy Act (RFPA)

The Right to Financial Privacy Act of 1978 is a United States federal law, Title XI of the Financial Institutions Regulatory and Interest Rate Control Act of 1978, that gives the members of financial institutions the right to some level of privacy from government searches.

Risk

In simple terms, risk is the possibility of something bad happening. Risk involves uncertainty about the effects/implications of an activity with respect to something that humans value, often focusing on negative, undesirable consequences.

Safe Harbor

The Federal law protects from civil liability to the institutions and its directors, officers, employees, and agents that make a disclosure of any possible violation of law and regulation (in the SAR Context).

Suspicious Activity Report (SARS / SAR)

In financial regulation, a Suspicious Activity Report or Suspicious Transaction Report is a report made by a financial institution about suspicious or potentially suspicious activity.

Social Security Number (SSN)

In the United States, a Social Security number is a nine-digit number issued to U.S. citizens, permanent residents, and temporary residents under section 205 of the Social Security Act, codified as 42 U.S.C. § 405.

v2 - 11/30/2020

page 126

Structuring

It is the spacing of transactions for illicit purposes. It is a federal crime in the U.S.

Title VII

Title VII of the Civil Rights Act of 1964. Title VII of the Civil Rights Act, as amended, protects employees and job applicants from employment discrimination based on race, color, religion, sex and national origin.

USA PATRIOT Act

It is an Act of the United States Congress that was signed into law by the U.S. President George W. Bush on October 26, 2001. USA PATRIOT is a backronym that stands for Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism. The Patriot Act was written following the 09/11 attacks in an effort to tighten U.S. national security, particularly as it related to foreign terrorism.

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Acronyms

ACH

Automated Clearing House

AML

Anti-Money Laundering

API

Application Programming Interface

APY

Annual Percentage Yield

APR

Annual Percentage Rate

B2B

Business to Business.

BPO

Business Process Outsourcing

BSA

Bank of Secrecy Act

C2C

Customer to Customer

CCPA

California Consumer Privacy Act

CDD

Customer Due Diligence

CD

Certificate of Deposit

CPI

Customer Identification Program

D2M

Direct to Member

DMG

Physical Damage

DDA

Demand Deposit Account

EEOC

Equal Employment Opportunity Commission

EFT

Electronic Fund Transfers

ETF

Exchange Traded Fund

EIN

Employee Identification Number

FDIC

Federal Deposit Insurance Corporation

FinCen

Financial Crimes Enforcement Network

FRD

Suspected Fraud

FX

Forex

IIPPA

California's Insurance Information and Privacy Protection Act

i.e.

For example

Lock

Lock Card

LST

Lost Card

N/A

Not available.

OFAC

Office of Foreign Asset Control

PII

Personally Identifiable Information

P2P

Peer to Peer / Person to Person

PAN

Primary account number or Payment card number

POS

Point of Sale

RFPA

Right to Financial Privacy Act

SARS / SAR

Suspicious Activity Report

SDN

Specially designated Nationals

SSN

Social Security Number

STL

Stolen Card

SLAs

Service Level Agreements

TBC

To be confirmed

TBD

To be defined/determined

Card Network Log Codes

This is a back-side of banking. This is the code that VISA would send to us to explain why a transaction failed.

- ANF** - Account not found
- APP** - Approved
- CAD** - Card Access Denied
- CEM** - Card expire date mismatch
- CEX** - Card expired
- CLA** - Card limit amount exceeded
- CLC** - Card limit count exceeded
- CLS** - Closed
- CNA** - Card Not Active
- CNF** - Card Not Found
- DBN** - Denied by Network
- DEN** - Denied
- NSF** - Non-sufficient funds
- POI** - Card PIN offset invalid (member put in wrong PIN #)
- RDL** - Reg D limit
- STP** - Stopped

Banking & Generic Acronyms or Abbreviations

This is a list of generic banking acronyms not already listed.

- ACCT** - Account
- ADDR** - Address
- AMT** - Amount
- APR** - Annual Percentage Rate
- APY** - annual Percentage Yield
- APYE** - Annual Percentage Yield Earned

v2 - 11/30/2020

page 131

ATM - Automated Teller Machine
AUTH - Authorization
BIN - Bank Identification Number
BSA - Bank Secrecy Act
CD - Certificate of Deposit
CURR - Current
CTR - Currency Transaction Report
DNC - Do not call
ECOA - Equal Credit Opportunity Act
EFT - Electronic Funds Transfer
FICO - Fair Isaac Corporation
HELOC - Home Equity Line of Credit
IRA - Individual Retirement Account
LLC - Limited Liability Company
LOA - Leave of Absence
MICR - Magnetic Ink Character Recognition (a MICR line is the information at the bottom of a check)
OFAC - Office of Foreign Asset Control
PIN - Personal Identification Number
POD - Payable on Death
POS - Point of Sale
SAR - Suspicious Activity Report
TISA - Truth in Savings Act
UDAAP - Unfair, Deceptive, and Abusive Acts or Practices
VER - Verified

Bella Contacts

Names / Positions / Emails / LoveData

Name	Position	Email	LoveData / Notes
Angelo D'Alessandro	CEO	angelo@bellaloves.me	Lola Maria / Celeste / Bronco
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Chelsea Kim	Operations	chelsea@bellaloves.me	
Gabo Lugo	Marketing	gabo@bellaloves.me	
Michelle Beatty	Operations	michelle@bellaloves.me	
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Emily James	Operations	emily@bellaloves.me	
Ben Park	Product	ben@bellaloves.me	
Arjun Thusu	Security	arjun@bellaloves.me	
Lupo	Intern		
BELLA Legal		legal@bellaloves.me	
BELLA Compliance		compliance@bellaloves.me	
BELLA Privacy		privacy@bellaloves.me	
BELLA Support		support@bellaloves.me	
BELLA Collab		collab@bellaloves.me	Work together on events, products, or community impact projects
BELLA Ambassadors		ambassadors@bellaloves.me	Support for business or swag

			(tshirts, hoodies, etc)
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