

PREPAID NAVIGATOR

CUSTOMER COMPLAINT AND DISPUTE LOGS

Just a friendly reminder to all the Partners that the complaint and dispute logs should be sent to Sunrise Banks no later than the 15th of each month. For example, if you are submitting logs for October, 2015, have them submitted to prepaidcompliancegroup@sunrisebanks.com by November 15th, 2015.

When filling out the complaint logs please take note on any patterns or trends of complaints that you may be seeing. This practice will help you recognize and hopefully solve any major problems before they get too far out of hand.

Make sure when you are recording complaints that they are indeed complaints and not customer service calls. Some examples are listed below.

Complaints:

- Cardholder unable to get onto website.
- Text alerts are turned on but not working.
- Cardholder was charged a fee twice for same service.
- Direct deposit is still going to old/closed card and not to newly issued card.
- Cardholder was unable to get through to customer service.

Non Complaints/Customer Service calls:

- Cardholder needs help setting up PIN.
- Cardholder asking if their direct deposit has come in yet.
- Cardholder is asking how to check their balance.
- Cardholder is wondering how to navigate the website.

ZERO LIABILITY VISA AND MASTERCARD

Sunrise Banks is currently working on a Network Zero Liability Guidance Guide. In the months to come this guide will be finalized and forwarded on to you. Some things to expect in this guide would be:

- An overview of what Zero Liability is and what it will mean for you going forward.
- Affected Partners will be expected to submit dispute logs, and will be audited.
- How to log and keep track of Zero Liability.
- Any new terms associated with Zero Liability.
- Zero Liability dispute time frames.
- Completing and dispute resolutions.

There will be more to come on Zero Liability in the near future.

ANNUAL NOTIFICATION REQUIREMENT REMINDER

Annual Error Resolution and Privacy Notices, to the extent applicable for each respective Program Manager, need to be sent annually to all active card accounts. Sunrise Banks defines an active account as any account that has had customer initiated transaction activity within the last 12 calendar months. You should already be in receipt of the 2015 Sunrise Banks Prepaid Card Privacy Notice Safe Harbor Format Template and the 2015 Sunrise Banks Prepaid Card Annual Error Resolution Notice Template. The notices must be delivered to cardholders by December 15th, 2015. You are responsible for providing documentation to Sunrise that demonstrates:

- All active accounts have received the Notifications (e.g. receipt of mailing);
- The method of delivery (e.g. US Postal Mail) - this typically is done by working with your processor;
- The Date of delivery; and
- A copy of the Notice that was provided.

You are required to provide Sunrise with reports/evidence of delivery by December 31, 2015 via email (secure email if the documentation provided contains any Non-Public Personal Information) to prepaidcompliancegroup@sunrisebanks.com CC: Pete.Hedglin@sunrisebanks.com and the Relationship Manager servicing your account.

VISA CAMS

Sunrise Banks has transitioned the receipt and review of all Visa CAMS alerts to Program Managers supporting Visa programs as of December 31, 2015.

After December 31, 2015 all Program Managers supporting Visa card programs will be responsible for receiving and reviewing the Visa CAMS alerts through the Visa Risk Manager (VRM) system.

VRM is accessed through the www.VisaOnline.com website and the at-risk accounts distributed through CAMS come from a variety of sources, including merchants/processors who have been the victim of a hacking (electronic data compromise), law enforcement agencies that have recovered account data as the result of an arrest/search warrant (these could be seized from computers or printed lists of data) and merchants who have had computer equipment or large volumes of receipts stolen.

Once you access the CAMS reporting through the Visa Risk Manager system at the Visa Online site, it is up to you on how to move forward – i.e., monitor, close, list on a warning bulletin. Once in the CAMS website you can click on the HELP function to download the “Best Practices for Dealing with a Compromise” document published by Visa. It will provide you with helpful recommendations and a good basis from which to start.

If your organization is not set up to receive CAMS alerts through the Visa Risk Manager system, please contact your Sunrise Banks Client Relationship Manager immediately to get set up for this very important service.

COMING SOON!

In the next month you will receive training materials from our BSA/AML, Third Party Risk and Compliance teams. These materials will need to be reviewed by all your team members before the end of the year and an attestation signed by an officer of your organization and returned to Sunrise Banks stating that your staff has reviewed the materials. These materials will be updated and distributed each year as part of our ongoing oversight process. If you have any questions on this contact your Client Relationship Manager.

ACH NOTICE FOR GPR CLIENTS

Prepaid Programs receiving ACH transactions (Direct debits and credits) are subject to receiving communications from the originator of the funds regarding current status of the funds or requesting return of the funds available due to error or suspected fraud on their end. This correspondence is sent to the receiving bank (Sunrise Banks) and is then forwarded to the Program Manager for completion. Correspondence includes Trace Requests, Letter of Indemnity (LOI), ACH disputes, Reclamation requests, or Hold Harmless letters. The Program Manager is the end source of any funds as they hold the account and the customer information within their platform. In order to streamline the processing of these requests the bank will forward all correspondence to the Program Manager for completion. Below are basic guidelines as to how these requests should be handled by the Program Manager. Please schedule a meeting with your Client Relationship Manager if you have questions or concerns.

1. If all funds are available on the card.
 - a. PM will unload funds from card
 - b. PM will notify bank of amount reversed off the card (PrepaidOperations@sunrisebanks.com)
 - c. Bank will process an ACH return if the PM is unable to include in their daily return file
- d. No response needed to LOI by PM unless additional information is requested by the originator
2. Partial funds available and address provided in correspondence
 - a. PM will unload funds from card
 - b. PM will notify bank of amount reversed off the card (PrepaidOperations@sunrisebanks.com)
 - c. Bank will process check request back to originator
 - d. No response needed to LOI by PM unless additional information is requested by the originator
3. Partial funds available and no address provided in correspondence
 - a. PM will respond back to the originator regarding current balance on the card
 - b. Originator will need to advise of next steps if any
4. No funds available.
 - a. PM will respond back to the originator regarding current balance on the card
 - b. Originator will need to advise of next steps

FREEZE SCHEDULE 2015-2016

Please find below the current freeze schedule dates received to date by the bank from our processors and participating networks.

| Processor | Start Date/Time | End Date/Time | Impacts | Program Implementation Impacted |
|-----------|---|--|---|---------------------------------|
| Fiserv | Monday, November 23, 2015 (beginning at 12:01 am Eastern time) | Monday, November 30, 2015 (ending at 11:59 pm Eastern time) | Card Services will observe two implementation freeze periods in late 2015 to maintain the most stable processing environment possible during a time when transaction volume traditionally increases. During these windows, routine application and system program updates, such as code changes, and normal implementation project activity, such as ATM or parameter changes, will not be performed. The end-of-year freeze schedule is below. | Yes |
| | Monday, December 14, 2015 (beginning at 12:01 am Eastern time) | Monday, January 4, 2016 (ending at 11:59 pm Eastern time) | | |
| FIS South | Monday, November 16, 2015 | Friday, January 8, 2016 | No new programs or enhancements to an existing program will be released into the FIS Production environment. This freeze impacts all applications / systems including IVR, Web sites, Databases, Middleware Components and Stored Procedures. | Yes |
| FIS North | Monday, November 16, 2015 | Friday, January 8, 2016 | A year-end freeze will be established for all application system changes, applications include, but are not limited to, Card Management, Settlement Manager, Data Manager, and the Online Switch Applications. | Yes |
| i2c | December 1, 2015 | February 15, 2016 | There will be no major releases; however, minor changes are expected to be released with no changes in authorization engine. | No |

FREEZE SCHEDULE 2015-2016 CONTINUED

| Networks | Start Date/Time | End Date/Time | Impacts | Program Implementation/ Deletion Impacted |
|----------------------------|---|--|---|--|
| Visa | 0001 November 9, 2015 GMT | 2359 January 2, 2016 GMT | 2015-2016 Peak Season During these control periods, clients and processors should adjust their processing parameters and operational procedures accordingly. Clients are also encouraged to refrain from implementing or converting card programs during these periods, as Visa will have limited ability to provide emergency system updates. | Yes |
| MasterCard | October 10, 2015 | October 21, 2015 | Dual Message System (Authorization) and Single Message System Implementation/Dual Message System (Clearing) No customer-requested parameter changes may take effect on these business processing dates. Authorization, Clearing, Single Message System | Yes |
| | November 9, 2015 | November 11, 2015 | MIP Global Roll - Dual Message System (Authorization and Clearing) and Single Message System Implementation No customer-requested parameter changes can become effective on these business processing dates. | |
| | January 22, 2016 | January 22, 2016 | Single Message System Implementation No customer-requested parameter changes on the Single Message may take effect on this business processing date. | |
| NYCE | November 25, 2015 | November 29, 2015 | NYCE Network cannot be added into production on these dates | Yes |
| | December 18, 2015 | January 22, 2016 | NYCE Network cannot be added into production on these dates | |
| STAR | November 11, 2015 | November 11, 2015 | [STAR NE - no Maintenance Install] No Change Period Veterans Day | Yes |
| | November 20, 2015 | November 30, 2015 | No Change Period Thanksgiving | |
| | December 1, 2015 | December 17, 2015 | Heightened Awareness Period (Frost) The freeze parameters include all application and infrastructure changes in addition to participant, processor and ATM specification changes processed through Client Implementations, ATM Implementations and Processor Relations | |
| | December 18, 2015 | December 26, 2015 | No Change Period Christmas | |
| | December 27, 2015 | January 3, 2016 | No Change Period New Years Day | |
| | January 4, 2016 | January 17, 2016 | Heightened Awareness Period (Frost) The freeze parameters include all application and infrastructure changes in addition to participant, processor and ATM specification changes processed through Client Implementations, ATM Implementations and Processor Relations | |
| Pulse | November 23, 2015 | November 30, 2015 | Pulse Network cannot be added into production on these dates | Yes |
| | December 21, 2015 | January 4, 2016 | | |
| Accel/ Exchange | Monday, November 23, 2015 (beginning at 12:01 am Eastern time) | Monday, January 4, 2016 (ending at 11:59 pm Eastern time) | Card Services will observe two implementation freeze periods in late 2015 to maintain the most stable processing environment possible during a time when transaction volume traditionally increases. During these windows, routine application and system program updates, such as code changes, and normal implementation project activity, such as ATM or parameter changes, will not be performed. The end-of-year freeze schedule is below. | Yes |
| | Monday, December 14, 2015 (beginning at 12:01 am Eastern time) | Monday, January 4, 2016 (ending at 11:59 pm Eastern time) | | |