Presented by: Stephen Simcock, General Counsel for Consumer & Community Banking for JPMorgan Chase & Co.
Privacy | Matters

Safeguarding consumer data is core to Chase's relationship, compliance and business strategies

- An extensive set of existing legal and regulatory requirements and industry standards, including
  - Gramm-Leach-Bliley Act and Regulations P and S-P
  - Interagency Guidelines Establishing Information Security Standards
  - Right to Financial Privacy Act
  - California Financial Information Privacy Act
  - PCI-DSS

- A focus on evolving with
  - Enhancing data stewardship – knowing our data
  - Data use and sharing forums with multi-disciplinary expertise and not just “can we?” but “should we?”
  - Understanding potential benefits as well as we understand potential risks
  - Ethics

- Chase has a long-standing, multi-faceted data protection program
  - Governance and Controls
  - Cyber Defense and Fraud
  - Identity and Access Management
  - Data Management
  - Technology Resiliency
  - Security, Investigations and Crisis Management
  - Breach Incident Management
  - Third Party Oversight
  - Records Management
  - Retention and Destruction
  - Training & Awareness
SHAPING PRIVACY LEGISLATION

- Harmonization
  - Consumers benefit from uniform rights and protections
  - Organizations benefit from consistency, which promotes understanding, effective deployment of resources and compliance
  - Innovation and competition thrive in stable policy environments

- Key Elements
  - Consumer empowerment through basic rights (e.g., access, deletion, correction)
  - Organizational accountability through comprehensive privacy programs that demonstrate compliance
  - Flexible, risk-based approach to operations—rather than highly prescriptive obligation
  - Consistent and effective enforcement

STATE AGs

- Focus on consumer protection
- Local knowledge and insight
- Multi-state coordination
- Coordination with federal regulators
Elder Vulnerable Customers | Someone We Know

Elder financial exploitation (EFE) is a serious and growing problem. Financial institutions can provide important tools to help identify, detect, prevent and respond to EFE.

Chase’s Efforts In Combating EFE

- Established a Firmwide Elder and Vulnerable Person (EVP) policy
- Launched annual awareness training
- Implemented business procedures designed to comply with state laws
- Centralized investigation and reporting
- Created an Oversight Team to make sure there is training and compliance with legal requirements
- Strengthened its ability to protect customer assets by adding account contractual language permitting account freezes, which can be used where EFE is suspected

Client Focus

- The elder and vulnerable adult population needs enhanced protection from exploitation. Chase formed an expert “Chase Accessibility Services” unit as a resource to those customers who need assistance due to age-related disability or other vulnerability.
  - Summer 2019
    - Chase will offer AARP BankSafe Training to our branch employees
    - Chase is launching campaigns in branches, in employee facilities and on social media to increase customer & employee awareness of EFE in general and for World Elder Abuse Awareness Day (WEAAD)