

**Module 4**

Reuse & Redisclosure of nonpublic personal information received from a nonaffiliated financial institution under Sections 14 and/or 15.

- A. Through discussions with management and review of the institution's procedures, determine whether the institution has adequate practices to prevent the unlawful redisclosure and reuse of the information where the institution is the recipient of nonpublic personal information (§11(a)).
- B. Select a sample of data received from nonaffiliated financial institutions, to evaluate the financial institution's compliance with reuse and redisclosure limitations.
  1. Verify that the institution's redisclosure of the information was only to affiliates of the financial institution from which the information was obtained or to the institution's own affiliates, except as otherwise allowed in the step b below (§11(a)(1)(i) and (ii)).
  2. Verify that the institution only uses and shares the data pursuant to an exception in Sections 14 and 15 (§11(a)(1)(iii)).
- C. Checklist Cross References—Module 4

<b>Regulation Section</b>	<b>Subject</b>	<b>Checklist Questions</b>
11(a)	Reuse and disclosure presentation	44

**Module 5**

Redisclosure of nonpublic personal information received from a nonaffiliated financial institution outside of Sections 14 and 15.

- A. Through discussions with management and review of the institution's procedures, determine whether the institution has adequate practices to prevent the unlawful redisclosure of the information where the institution is the recipient of nonpublic personal information (§11(b)).
- B. Select a sample of data received from nonaffiliated financial institutions and shared with others to evaluate the financial institution's compliance with redisclosure limitations.
  1. Verify that the institution's redisclosure of the information was only to affiliates of the financial institution from which the information was obtained or to the institution's own affiliates, except as otherwise allowed in the step b below (§11(b)(1)(i) and (ii)).
  2. If the institution shares information with entities other than those under step a above, verify that the institution's information sharing practices conform to those in the nonaffiliated financial institution's privacy notice (§11(b)(1)(iii)).
  3. Also, review the procedures used by the institution to ensure that the information sharing reflects the opt out status of the consumers of the nonaffiliated financial institution (§§10, 11(b)(1)(iii)).

- C. Checklist Cross References—Module 5

<b>Regulation Section</b>	<b>Subject</b>	<b>Checklist Questions</b>
11(b)	Reuse and redisclosure	45