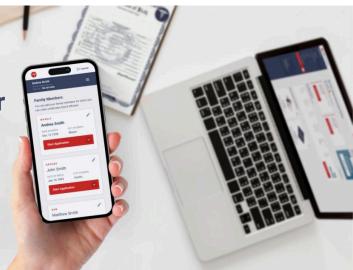
# **VRO LLC Security 2024 Whitepaper**

VitalRecordsOnline.com is leading the way in protecting our customers' personally identifiable information (PII).





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# Introduction

# Why Trust, Security, and Compliance Matter When Ordering Certified Birth, Marriage, or Death Certificates Online

This security whitepaper demonstrates our commitment to safeguarding our customers' confidential information and compliance with state and federal agency security protocols. VRO (VitalRecordsOnline.com) is a trusted vital record application processor for U.S. citizens, assisting B2B, B2C, and B2G (Business to Government).

Data security has become a top concern for businesses and consumers in today's digital age. With cyber threats becoming more sophisticated and prevalent, organizations must stay ahead of the curve to protect customer data effectively. This whitepaper outlines the key strategies and technologies that VRO LLC implemented in 2024 to protect customer data.

VitalRecordsOnline.com is a secure platform for assistance when ordering certified copies of vital records, including birth, marriage, death, and divorce certificates, as we understand the risks of these documents being used for identity fraud. Birth certificates containing sensitive personal information are often exploited for identity theft, enabling scammers to open bank accounts, apply for credit cards, obtain driver's licenses and passports, claim benefits, or be linked to fraudulent activities. This is because they contain sensitive, personally identifiable information (PII) such as our full name, date of birth, place of birth, and even our parents' names, including our mother's maiden name.

The issue is exacerbated by the sale of leaked birth certificate images on the Dark Web or fake websites, posing threats to financial security and causing financial losses to the government. Children with clean financial records and seniors who may unwittingly divulge personal information are particularly vulnerable. Thus, it's essential to safeguard our customers' vital record information. VRO strives to prevent the exposure of confidential information in vital records and educate the public about the potential dangers of identity theft and fraud.



### About VitalRecordsOnline.com

VitalRecordsOnline.com (VRO LLC), owned and operated in the U.S., complies with applicable privacy and security mandates to meet national industry standards for protecting PII (Personal Identifiable Information) and customer convenience. While we have developed a simplified online solution for vital records replacements, our privacy policies and security compliances are necessary to help safeguard our customers' information and comply with federally mandated standards set by **The U.S. Department of Commerce**.

Every state, county, and local government has unique regulations and procedures to protect its citizens' confidential information in vital records. As a result, it's often challenging to understand which agency to contact when requesting a copy of a certified birth, marriage, death, or divorce certificate.

VitalRecordsOnline.com continuously analyzes over 10,000 local government applications and maintains an extensive database of the various rules and regulations for the over 3,000 states and counties across the U.S. The application process is secure and straightforward, and they simplified the process of applying for these certificates, making it as easy as possible. In addition, trained experts review every application for accuracy to ensure the fastest, most accurate processing time.



# **Security Is Our Priority**

Vital record documents are the most commonly abused documents for identity fraud, known as "breeder documents," resulting in the federal government implementing a nationwide audit and alerting system to prevent and mitigate vital record exploitation.

VitalRecordsOnline.com dedicates itself to keeping people's vital record information safe and secure. Keeping personal information secure, confidential, and transportable is becoming challenging as individuals, Government offices, and authorized agencies request, use, and transmit private data online. VRO's top priority is to protect people's identity and personal information with a safe and secure way to request vital records replacements online.

At VRO, our responsibility is to instill security practices that meet and exceed the U.S. Department of Commerce standards for handling, processing, and transmitting client data. This whitepaper explains the security measures, data protection methods, and technologies for handling customer data on VitalRecordsOnline.com.

#### 2019 - 2022 Data Breaches - The Worst So Far

During 2021-2022, a disruptive increase in online fraud affected the internet. The exposure of consumers' PII through data breaches reached a staggering scale, placing nearly 300 million individuals in danger of identity theft and fraudulent schemes. An <u>insightful report</u> by Identify Force in 2021 demonstrated prevalent threats plaguing the cyber landscape.

Onlinevitalus	December 2019	750,000 customers affected (source)
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ABirth Certificates are considered as "breeder documents" to obtain fraudulent identities.

Cash App	April 2022	8.2 million customers affected
SHEIN	October 2022	39 million customers affected
Nelnet Servicing	June 2022	2.5 million student social security numbers leaked
Medibank	October 2022	9.7 million customers affected
Optus	September 2022	11 million customers affected



We are committed to maintaining the highest levels of data security and privacy by implementing robust security measures, including SSL encryption, PCI compliance, and adherence to HIPAA and COPPA regulations. We also conduct regular audits and provide comprehensive training to our staff to ensure ongoing compliance and security.

- Adherence to State Regulations Every state mandates the privacy of essential records to safeguard the information of its citizens and prevent identity theft.
- Secure Track Record VRO has securely processed over 1,000,000 orders for vital record replacements online since 2018.
- **Customer-Focused** Phone support experts can assist you from 9 a.m. to 6 p.m. EST, Monday through Friday, if you need help accessing or securing your account.
- **Error-Free** Dedicated experts examine and verify that your application, documentation, and personal information are entirely correct.
- **Confidential** Data submitted in requests is never sold or shared for any purposes to 3rd parties beyond payment or legal enforcement.
- Safe, Secure, and Compliant Hardened security with SSL encryption, PCI Compliance, HIPAA, and COPPA.
- Identity Verification VRO employs identity verification processes to ensure that only authorized individuals can access and request vital records to help prevent any unauthorized access or fraudulent activity.



# **Protecting Customer Data**

VRO dedicates itself to keeping people's personal information safe and secure. An individual's birth, marriage, death, or divorce certificates are essential identity documents, and all government offices or authorized agency submissions encrypt the transmission through a secure channel.

In addition, we use high-end server hosting with dedicated servers in the U.S. We also adhere to all PCI compliance requirements to keep your credit card and banking information safe. Your payment information goes straight to our merchant processing center in the United States. **We do not save your banking data**; the only items kept on file are the last four credit card digits and the expiration date. We must keep this information in case of a transaction request from your bank.

## **Data Encryption**

Data encryption is a fundamental aspect of any robust security strategy. VRO will employ state-of-the-art encryption algorithms to ensure customer data remains secure during transit. Encrypting sensitive data will render it useful with the decryption key, even if it falls into the wrong hands.

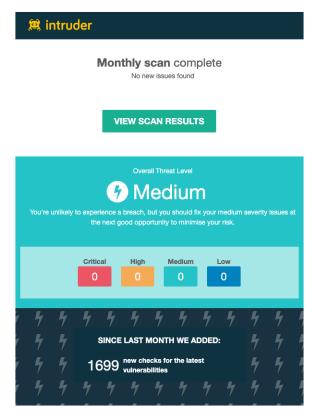
## **Data Protection**

The United States has established strict data protection laws and regulations, such as the General Data Protection Regulation (GDPR) for U.S. citizens who utilize our services while living abroad and the California Consumer Privacy Act (CCPA). By employing staff within the U.S., VRO can ensure compliance with these regulations and safeguard confidential information from being mishandled or accessed by unauthorized entities.



# **Penetration Testing**

VRO LLC conducts regular penetration testing to identify system and network vulnerabilities. This proactive approach allows them to identify and address potential weaknesses before malicious actors exploit them. By regularly testing their security measures, VRO LLC ensures that customer data remains secure.



Penthreat scan passed on Nov 1st 2023





## **Norton Security**

VRO LLC relies on Norton Security to provide additional protection for customer data. Norton Security offers advanced security features, including real-time threat detection, malware protection, and secure browsing. By leveraging Norton Security, VRO LLC ensures customer information is safeguarded from potential cyber threats.

# Maintaining a Secure Workplace Landscape

### **Secure Development Practices**

VRO understands the importance of building security into its products and services from the ground up. By following secure development practices, such as conducting regular code reviews, penetration testing, and adhering to industry best practices, VRO ensures its software and systems are resilient against potential vulnerabilities.

## **Continuous Monitoring and Threat Intelligence**

VRO leverages advanced monitoring tools and threat intelligence services to proactively detect and respond to suspicious activities or potential threats.

## **Routine Security Audits**

To maintain a high level of security, VRO will conduct regular security audits to identify any potential weaknesses or gaps in its infrastructure. These audits will help VRO proactively address any vulnerabilities and take necessary measures to mitigate potential risks.

## Multi-Factor Authentication (MFA)

VRO utilizes multi-factor authentication across all its platforms to prevent unauthorized access. MFA adds an extra layer of security for our staff to provide multiple forms of verification before accessing our data servers and customer's confidential information.



## **Incident Response Plan**

Despite robust security measures, it is essential to have a well-defined incident response plan in place. VRO has a dedicated remediation team responsible for promptly managing and responding to security incidents. Our team will follow predefined protocols to minimize the impact of any potential breaches and ensure a rapid recovery. In the event of a data breach, all customers are notified of the breach, what information was exposed, and methods to mitigate and protect their personal information.

VRO is prepared to follow incident response protocols in the event of a data breach regarding confidential vital records data in accordance with the State Vital Records Registrar.

## **Employee Training and Awareness**

VRO recognizes that employees play a crucial role in data security. Therefore, comprehensive training programs will be implemented to educate employees about the latest security threats, best practices, and how to handle customer data responsibly. Regular awareness campaigns also keep security at the forefront of employees' minds.

By employing only U.S.-based staff, VRO aims to mitigate the risk of exposing confidential information to unregulated countries. This decision involves several reasons and benefits:

- Security concerns: Some countries may have weaker cybersecurity measures or a higher risk of cyber threats. By employing staff within the U.S. borders, VRO can better maintain and monitor security protocols, reducing the likelihood of data breaches or unauthorized access to confidential information.
- **Legal jurisdiction:** In case of any legal disputes or breaches, having a U.S.-based staff ensures that VRO falls under the jurisdiction of U.S. courts and legal systems. This can provide more favorable conditions for resolving conflicts and enforcing contractual obligations.
- **Trust and reputation:** Hiring U.S.-based staff enhances VRO's reputation and fosters trust among clients and partners who value data privacy and security. This demonstrates our commitment to protecting our customers' confidential information.



# **Security Compliances 2024**

VRO exceeds US Dept. of Commerce standards for handling PII.



# **SSL Encryption**

All submissions go through a 256-bit SSL encrypted, secure channel to ensure customer information is transmitted and collected without risks. SSL (Secure Sockets Layer) encryption provides high-level security by encrypting the data exchanged between a client (such as a web browser) and our servers to prevent unauthorized access, interception, or tampering with sensitive information.

# **PCI Compliance**

## What Is PCI Compliance?

Payment Card Industry (PCI) compliance mandates all credit card companies to secure the processing of credit card transactions. Payment card industry compliance refers to the technical and operational standards businesses follow to protect credit card data provided by cardholders and transmitted through card processing transactions. PCI standards for compliance are developed and managed by the <u>PCI Security Standards Council</u>.

#### **VRO's PCI Compliance**

VRO maintains stringent Payment Card Industry (PCI) compliance standards to ensure cardholder data's secure processing, storage, and transmission. Our robust security measures include firewalls, encrypted transmissions, access controls, and regular vulnerability assessments. Additionally, we conduct regular audits and maintain a secure network infrastructure to protect against potential cyber threats. By adhering to these measures, we assure our customers that their credit card information is handled with the utmost care and confidentiality.



# **COPPA Compliance**

### What Is COPPA Compliance?

The **Children's Online Privacy Protection Rule (COPPA)** imposes certain specific requirements on operators of websites or online services directed to children under 13 years of age and on operators of other websites or online services that have actual knowledge that they are collecting personal information online from a child under 13 years of age.

#### **VRO's COPPA Compliance**

VitalRecordsOnline.com (VRO) fully complies with the Children's Online Privacy Protection Rule (COPPA). VRO recognizes the importance of protecting children's privacy, especially in the digital world. As a result, VRO adheres to all COPPA regulations, ensuring that it does not knowingly collect personal information from children under 13 years of age without obtaining verifiable parental consent. VRO provides transparent information about its data collection practices and allows parents to review and delete their child's information when necessary. This commitment to COPPA compliance reflects VRO's dedication to safeguarding the privacy of all its users, regardless of their age.

## **HIPAA Compliance**

#### What Is HIPAA Compliance?

The Health Insurance Portability and Accountability Act (HIPAA) is a U.S. law designed to provide privacy standards to protect patients' medical records and other health information provided to health plans, doctors, hospitals, and other health care providers. Developed by the Department of Health and Human Services, these standards give patients access to their medical records and more control over how their personal health information is used and disclosed.

#### **VRO's HIPAA Compliance**

We take HIPAA compliance very seriously at Vital Records Online (VRO). As a trusted online platform for ordering certified birth, marriage, or death certificates, VRO handles sensitive personal data that may fall under the purview of HIPAA. Therefore, we ensure that all our processes comply with HIPAA regulations, from data collection to data storage and transmission.



For U.S. citizens who use our services, any health-related information we collect while providing our services is protected under HIPAA's stringent privacy rules. We use secure, encrypted channels to transmit this information, ensuring it is only accessible to authorized personnel. Additionally, we adhere to HIPAA's minimum necessary rule, meaning we only request and use the minimum amount of personal health information necessary to fulfill our service.

# VRO's Adherence to HIPAA Provides Assistance Opportunities to Non-Profit Organizations in Social Welfare Sectors

For agencies involved in community service fields that may interact with VRO, our HIPAA compliance ensures that any personal health information shared during these interactions is handled with utmost security and confidentiality. We understand that some agencies often work with vulnerable populations, and protecting their clients' personal health information is paramount.

VRO implements strict access controls and secure data transmission methods to prevent unauthorized access or disclosure of this sensitive information. Furthermore, we conduct regular audits and train our staff on HIPAA compliance to consistently meet these standards.

In conclusion, VRO's adherence to HIPAA regulations reinforces our commitment to maintaining the privacy and security of vital information. We understand the trust our customers and community service agencies place in us, and we strive to uphold this trust by ensuring the highest levels of data protection and regulatory compliance.

# **Data Collection**

Vital Records Online collects data from users and agencies to improve customer service, the user's experience, processing times, and document requests. **The personal information collected is never sold for 3rd party marketing purposes**.

Vital Records Online only shares customer data with service providers and legal enforcement when requested. Visit our <u>privacy page</u> for complete details.

## https://www.vitalrecordsonline.com/privacy

VRO's Privacy Policy outlines our practices for gathering and utilizing Personal Identifiable Information (PII). By accessing our website, users consent to these terms. We may collect information such as names, email addresses, phone numbers, and credit card details. This data can be used for communication purposes, including newsletters, marketing materials, and other



pertinent information. We also gather non-PII, including IP addresses and browser data. Cookies, while enhancing user experience, can be disabled by the user.

The collected data is leveraged to enhance customer service, customize user experiences, process transactions, and manage surveys or promotions. Third parties may access user data strictly for specific objectives, adhering to stringent privacy and security policies. We may disclose user data in response to legal or government requests.

User-provided email addresses are exclusively used for order updates and responding to queries. Users have the option to opt out of company news and related information. We implement reasonable safeguards to protect user data; however, absolute security cannot be assured. We do not gather information from individuals below 13 years of age.

Our privacy policy is subject to change; users are advised to review it periodically. Customers contact our security teams via our contact page for any queries or concerns.

# **Data Retention**

Our customers are ultimately responsible for ensuring that the data they submit to Vital Records Online is accurate. Vital Records removes personal information upon request, and we are legally required to keep transaction information for one year to respond to bank transaction requests.

#### **Data Deletion Upon Request:**

At Vital Records Online, we understand the importance of data privacy and control. Therefore, we have established a straightforward process for users to submit data deletion requests. If a user decides they want their personal information removed from our databases, they can request through our dedicated support area on <u>vitalrecordsonline.com/support</u> or submit a request to <u>privacy@vitalrecordsonline.com</u>, and we will permanently delete your data. Our team promptly reviews and processes these requests in compliance with relevant data protection laws and regulations.

Once the deletion is completed, we confirm the request with the user. It's important to note that while we strive to erase all requested data, some information related to transactions may need to be retained for legal and compliance purposes. This process demonstrates our commitment to upholding user privacy rights and ensuring our customers feel secure when using our services.



# **Data Security for Agencies**

VRO provides custom vital records solutions to help agencies and document professionals, such as passport preparers and attorneys, streamline their procedures while ensuring customer privacy.

Passport and travel agencies, law offices, or background-checking services that request high volumes of vital records for customers also benefit from VRO's comprehensive tools.

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Users 550,093 Users with Profiles	न्नि Hide Filter 🖉 E	dit Columns • 7	🕒 Export 💩 A	dd/Edit Profile Q Se	earch profiles	Simple Forms
∷ ALL USERS + Filter						<ul> <li>Professional Application</li> <li>Preparation</li> </ul>
Name	Email	Date 🗘	County Birth	Certificate	City	Intuitive Dashboard
Jhon Edwards	jedwards@gmail.com	Jul 19, 2021	Nevada	Birth Certificate	Penn Valley	
Matthew Adams	m.adams01@yahoo.com	Jul 19, 2021	Los Angeles	Death Certificate	Malibu	
Elisa Simons	elisa.s@yahoo.com	Jul 19, 2021	Fresno	Marriage Certificate	Riverdale	
Steven Swanson	sswanson@hotmail.com	Jul 19, 2021	Alaska	Birth Certificate	Bethel	
B Jhon Jhonson	jh_jh2011@yahoo.com	Jul 19, 2021	Colorado	Death Certificate	Gunnison	
Michael Donovan	michaeldon@outlook.com	Jul 19, 2021	Georgia	Marriage Certificate	Lamar	Ø



# **Choice Partnerships with Compliance**



VRO incorporated <u>Notarize.com</u> into its vital records virtual application system to ensure strict <u>security compliance</u> and facilitate a streamlined procedure for securing notarial services as mandated by each state.

Notarize.com maintains compliance with **Know Your Customer (KYC)** regulations, **Knowledge-based authentication (KBA)**, **Remote Online Notarization (RON)**, **The Federal Cares Act**,

and **SOC** for notary adherence to the protocols, regulations, and requirements of their commissioning state for all 50 U.S. States when notarizing vital record applications online. **Notarize.com's interstate recognition** signifies acknowledging and validating notarial acts from a different state. The notarized document holds authoritative weight across all state lines as long as the notary is issued within a state that has ratified RON laws.

The partnership between VRO and FedEx will ensure a seamless and hassle-free delivery of vital records to customers. With FedEx's nationwide service and reputation for prompt and safe deliveries, customers' documents will reach them promptly and securely. This partnership further strengthens VRO's commitment to providing convenient and reliable customer service.



# **State Compliance and Security Roadmap**

VRO strives to provide the most up-to-date security for our online services. Continuing to manage Personal Identifiable Information securely is a priority to maintain the safety of customer data. Over **1 million** U.S. citizens have securely processed orders for certified vital record replacements. We strive to meet new regulatory compliances created by the state and the federal government.

VitalRecordsOnline.com positioned itself as the go-to company when state or county Government offices and authorized agencies are closed or face backlogs of applications due to events such as COVID lockdowns. Vital Records Online has dedicated itself to providing the best level of service to reduce rejected applications while offering flexible and cost-conscious fees.

#### Our roadmap includes:

**a. Understanding State Regulations:** We conduct extensive research into each state's specific requirements, including how each state handles vital records, what information is required, and any specific security measures that need to be in place.

**b. Developing Compliance Procedures:** We develop procedures to ensure compliance based on our understanding of state regulations. This includes implementing necessary security measures, training our staff on these procedures, and regularly auditing our processes to ensure ongoing compliance.

**c. Gaining Approval with State Agencies:** We work closely with state agencies such as the **CDPH-VR** (California Department of Public Health - Vital Records) to ensure our services align with their security requirements. This includes regular communication and collaboration to address any issues or concerns.

**d. Continual Improvement:** We are committed to improving our compliance and security practices continually. This includes staying up-to-date with changes in state regulations, implementing new technologies to enhance data security, and regularly reviewing our procedures to identify areas for improvement.

# 2024 Security Compliance Wrapup



At VRO, trust is the cornerstone of our service. We strive to earn this trust by providing a reliable service, protecting user data, and adhering to all relevant laws and regulations. Our dedication to security, privacy, and customer service has made us a leading provider of online vital records services.

Guillaume Ker

**CEO of Vital Records Online** 



