



# **The Solution to Safeguards Rule Compliance**

## **Online Panel Discussion**

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**Introduction:**

**Brian Hughes, Director of Communications, NJCAR**

**Moderated By:**  
Judy Vann Karstadt, MPFS, DCOP  
*NJCAR Academy Director*  
President, JV Solutions LLC  
732-492-1818  
E-Mail: [jvann592@gmail.com](mailto:jvann592@gmail.com)

**Panel Discussion By:**

Doug Fusco, CEO Dealer Safeguards Solutions  
Michael Dachille, Managing Director AutoTrieve  
Chris Cleveland, CEO & Co-Founder ComplyAuto



# Introduction

- **GLBA SAFEGUARDS RULE**  
Updated for the first time  
since 2002 – 2 to 145 pages
- **FTC ENFORCEMENT**  
Fine Increased in 2002  
from \$43,792 to \$46,517



# WHY DO DEALERS NEED TO COMPLY WITH GLBA?

- ▶ The Gramm–Leach–Bliley Act requires financial institutions – companies that offer consumers financial products or services like loans, financial or investment advice, or insurance – to explain their information-sharing practices to their customers and to safeguard sensitive data.
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# HOW DOES A DEALERSHIP MANAGE THE INFORMATION IT.....

- ▶ **COLLECTS** – DRIVERS LICENSE, INSURANCE CARD, STIPS, NON-PUBLIC PERSONAL INFORMATION
  - ▶ **CREATES** – CREDIT APPLICATION, MV DOCUMENTS, LENDING AGREEMENTS
  - ▶ **CONTROLS** – CUSTOMER FILES, CONSUMER FILES (DEAD DEALS), DATA PROTECTION, CYBER SECURITY, SERVICE PROVIDER OVERSIGHT
- 



Doug Fusco  
CEO

[doug@dsgss.com](mailto:doug@dsgss.com)

972-740-8638

Stop hoping...  
*Start knowing!*

# Mandatory Steps

- ✓ Training on Policies & Procedures
- ✓ Periodic Compliance Reviews

## **DO NOT DO LIST!!!**

- ✓ No paper
- ✓ FCRA
- ✓ Dead Deals
- ✓ Consistency - No shortcuts
- ✓ No text/Gmail
- ✓ Phone not personal copier
- ✓ Credit Apps
- ✓ Red Flags
- ✓ Fraud

While several of the new obligations may already be in place at many dealerships, others vastly expand what most dealers have developed and will require additional investments in software, technology, and potentially dealership personnel. The challenges involved in satisfying the new obligations could also increase dealers' liability exposure.



**AutoTrieve.com**  
Compliant Document Scanning as a Service (CDSaaS)

AutoTrieve specializes in secure Private Cloud-based Compliant Document Scanning as a Service (CDSaaS) for the Automotive Industry.

AutoTrieve is a service brand of Micro Graphic Information Service, Inc.

Michael Dachille, Managing Director

201-820-7419

[michaeld@mgcimaging.com](mailto:michaeld@mgcimaging.com)

[autotrieve.com](http://autotrieve.com)

# Why Outsource Document Scanning?

1. Protect Client Personal Information.
2. Mitigate Reduced Labor & Rising Costs.
3. Respond to OEM Audits & Requests.
4. Reclaim Retail, Office & Service Department Space.
5. Eliminate Filing and Loss of Documents when re-filing.
6. CDK & Other DMS Extract & Write-Back Integrations.

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AutoTrieve can help change how you scan and manage documents, reduce labor costs, maximize retail space, avoid audit penalties, and gain control of your business information while protecting customer's personal information.





### Chris Cleveland

Compliance Director, Galpin Motors  
CEO & Co-Founder, ComplyAuto Privacy



### John McCallan

Owner, Operator & Attorney, Raceway Ford  
Partner, Kearny Mesa Ford & Kia of Sunroad Auto



### Shane McCallan

Co-Founder, ComplyAuto Privacy  
General Counsel, Raceway Ford (former)  
Vice President, Auto Advisory Services (former)



### Hao Nguyen

General Counsel, ComplyAuto Privacy  
Staff Counsel, CNCDA (former)  
Sr. Manager of Legal Affairs, KPA (former)

## Our History

*"By Dealers. For Dealers."*

- ComplyAuto Privacy was created organically to solve problems faced by the owners at their own dealerships.
- What you'll achieve with ComplyAuto
  - *Privacy as a brand promise*
  - *Full compliance with state and federal privacy laws*
  - *Modern and automated solution*
  - *Compliance Guarantee*
  - *Reduced insurance premiums*
  - *Reduced data breach and ransomware liability*
- Over **700** dealers currently using the ComplyAuto software.



# COMPLYAUTO

# What is required under the revised GLBA Safeguards Rule?

## 4 WRITTEN POLICIES –

- A. Information Security Program
- B. Incident Response Plan
- C. Data Retention Plan
- D. IT Change Management System

## GLBA Updated Requirements

1. Internal Risk Assessments
2. Service Provider Risk Assessments
3. Employee Training
4. Annual Penetration Testing
5. BI-Annual Vulnerability Assessments
6. Phishing Simulations and Training

ComplyAuto LLC is a RegTech company offering cloud-based software that helps dealerships enhance their compliance capabilities while becoming more efficient and cost-effective. ComplyAuto uses data analytics and AI to provide real-time automated compliance decisions, performing tasks that would normally require manually-intensive processes and human intelligence.

# THANKS FOR COMING!! QUESTIONS FOR OUR PANEL?



Dealer Safeguards  
Solutions Doug Fusco  
[doug@dsgss.com](mailto:doug@dsgss.com)

AutoTrieve  
Michael Dacheille  
[michaeld@mgcimaging.com](mailto:michaeld@mgcimaging.com)

ComplyAuto  
Chris Cleveland  
[chris@complyauto.com](mailto:chris@complyauto.com)

Judy Vann -  
732-492-1818

Gail Caputi -  
609-760-2043