

Canadian Automotive Service Information Standard Vehicle Security Committee

VSP Registry & Secure Data Release Model Terms and Conditions of Use

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1.1. Preamble, Purpose & Definitions

- 1.1.1. The work and intent of the **Canadian Automotive Service Information Standard**, hereafter referred to as “**CASIS**”, and the **Vehicle Security Professional program in Canada** hereafter referred to as “**VSP**”, is to provide secure access to security related service information, including key codes, immobilizer reset information, security Personal Identification Numbers (PINs) and other information necessary needed to successfully enter, start and operate automobiles and light trucks at the request of retail consumers.
- 1.1.2. The Vehicle Security Professional Registry, hereafter referred to as “**the Registry**” and the Secure Data Release Model, hereafter referred to as “**SDRM**”, gives automakers a flexible system to support 24/7 access to vehicle security information for pre-approved locksmiths and technicians. It allows aftermarket service providers to support consumer needs without undermining the integrity and basic purpose of the vehicle security systems.
- 1.1.3. This secure access to security related service information can include, but is not limited to, mechanical key codes, electronic key codes, immobilizer reset codes, PIN codes, immobilizer seed and key system information, radio lockout codes, remote codes, and successor technologies.
- 1.1.4. For the purposes of this document, automobile and light truck manufacturers will be collectively referred to as “**automakers**”.
- 1.1.5. For purposes of “the Registry”, “SDRM” and “VSP”, automobiles are defined as passenger vehicles and light trucks, pickup trucks, vans and other light duty vehicles, excluding housecars, motor homes, motorcycles, heavy truck or other two-wheeled motor vehicles.
- 1.1.6. “The Registry” has been established in cooperation with participating automakers to facilitate the availability of security related service information to Vehicle Service Providers, hereafter referred to as “**VSP**”s, to support automotive consumers.
- 1.1.7. Once accepted into “the Registry”, every “VSP” will be assigned a unique Vehicle Security Professional (VSP) Identification number, referred to hereafter as “**VSP#**”

1.2. Policy

- 1.2.1. Under the “VSP”, security related service information is typically obtained directly from participating automakers through internet websites, telephone call centres and/or similar successor technologies. Automakers may require individual registration, subscriptions, and/or use fees and adherence to its own terms and conditions for use of/access to the websites or call centres. Not all automakers may participate or participate fully in Canada.
- 1.2.2. To gain access to security related service information from participating automakers, all users must be pre-validated by enrolling in “the Registry” and undergoing a criminal background check process.
- 1.2.3. In Canada “the Registry” is maintained by the Collision Industry Information and Assistance (CIIA) industry trade association under an agreement with the Hamilton District Autobody Repair Association. The organization shares an agreement with the National Automotive Trades Association of Canada, **NATA** as part of the CASIS program for sharing of vehicle security information. In the United States, “the Registry” is maintained by a registry administrator appointed by the National Automotive Service Task Force, **NASTF** (the “Registry Administrator”), which is currently through the **Automotive Service Association (ASA)**. The trade association, and the Associated Locksmiths of America (ALOA) represent independent automotive locksmiths and general repair shop owners respectively, and oversee “the Registry” on behalf of “NASTF”. “NASTF” and CASIS, through NATA in Canada have a working agreement to allow for the operation of the Vehicle Security Professional program in Canada..
- 1.2.4. “The Registry” is only available for use by businesses (sole proprietorships, partnerships and corporations) that have a Revenue Canada Agency identification number and are properly licensed (where applicable) and in good standing in the jurisdictions where they conduct business. The business must provide its tax identification number with a VSP application.
- 1.2.5. Registry account types: registered VSP account holders are also called Primary VSP account holders.
 - 1.2.5.1. The VSP account holder is typically, but not required to be, the business owner. The VSP account holder will be required to register individually, along with his or her business.
 - 1.2.5.2. The VSP account holder is responsible for all transactions and registry activity that occur on the business’ account.
 - 1.2.5.3. The VSP account holder may
 - 1.2.5.3.1. Manage account information for the business (phone numbers, addresses, e-mail addresses, etc)

1.2.6. Business ID: when a business account is first opened with “the Registry”, a business account number or “Business ID” is recorded.

1.2.7. Locksmith or auto repair VSP number: once accepted into “the Registry”, every VSP account holder, is assigned their own unique VSP# that is associated with the business they registered under.

1.2.8. Subcontractors: A business using “the Registry” shall not provide vehicle security information acquired through use of “the Registry” to a subcontractor or an independent contractor (as determined in accordance with the Revenue Canada Agency policy and related rules and regulations).

1.2.8.1. A business using “the Registry” (Business A) may use subcontractors and / or independent contractors who are also registered VSP account holders under a different business account (Business B), however, Business B must acquire their vehicle security information under their own VSP business account.

1.2.9. Expiration of VSP account: an VSP account is valid for two years

1.2.9.1. Prior to account expiration, a new application must be submitted along with the appropriate fees and other information as indicated on the Registry website; adequate time must be provided for application validation and new background check to avoid gaps in information accessibility.

1.2.9.2. When a VSP account holder’s account expires, the account of the VSP is locked until the account is revalidated.

1.2.9.3. If any of the requirements for an VSP account change status during the two year term of registration (i.e. expiration of insurance, fidelity bond, termination of a business entity), it is the responsibility of the VSP account holder to renew and/or update such information and notify the administrator of the the Registry within a reasonable amount of time, not to exceed 10 days.

1.2.10. Conditions of access and use of information acquired through “the Registry”: security related service information acquired through use of “the Registry” is acquired by an VSP account holder for the direct and primary benefit of the registered vehicle owner and is provided under the condition that the VSP account holder follow all conditions of the “Positive Identification Policy and Service Authorization Form”

1.2.10.1. All security related information acquired on behalf of the consumer shall be promptly turned over to the consumer and then promptly destroyed by the VSP account holder. It is a violation of the terms of

Registry use for a VSP account holder to retain any security related information after a transaction has been completed with the consumer.

1.2.10.2. Security related service information acquired through use of “the Registry” shall not be sold, bought, traded, bartered or shared in any way with any individual, business, entity, or person(s) other than the registered vehicle owner, except as follows:

1.2.10.2.1. Mechanical key codes may be processed through a third party, by permission of the VSP account holder, for the express purpose of gaining the specific physical key cutting specifications (biting information to physically cut the key); the associated vehicle identification number must not be provided to the third party.

1.2.10.2.2. Once the biting information is acquired, the physical production of the mechanical key from code (code cutting, duplicating the depth and space, milling or duplicating the cut configuration, or any other method or processes) shall only be conducted by the VSP account holder in the presence of, or with knowledge of, the registered vehicle owner.

1.2.11. Violations of Registry terms of use: any VSP account holder who is aware of any misuse of the Registry shall immediately report said misuse directly to the VSP Registry by contacting the Canadian VSP Administrator

1.2.11.1. Upon investigation and verification of misuse, the VSP account holder may be removed from “the Registry” and may be permanently restricted from being issued any subsequent VSP number/account.

1.2.11.2. Failure to report known misuse of the Registry constitutes violation of the Terms and Conditions of use of the Registry. “Failure to report” may result in removal from the Registry and permanent restriction from being issued any subsequent VSP number/account.

1.2.11.3. Sharing of user names and passwords between individuals is expressly prohibited. Breach of this policy will result in action against the VSP business owner, including potential removal from the Registry and permanent restriction from being issued any subsequent VSP number/account.

1.2.11.4. When an VSP account holder is suspended or terminated from the Registry, they can appeal the action to the CASIS Executive Committee. (*Registry Denial and Dispute Resolution Appeal Process*).

1.2.12. Customer information: use of the Registry may require the VSP account holder to gather, review, and record certain Personally Identifiable Information (PII) collected from the customer. Information that may be required includes, but is not limited to:

1.2.12.1. the customer’s full legal name

- 1.2.12.2.* visual verification of a valid vehicle registration document
- 1.2.12.3.* visual verification, of either the actual document or photocopy of a valid driver's license or other comparable government issued photo identification
- 1.2.12.4.* It is the responsibility of the VSP account holder to handle any Personally Identifiable Information in strict confidence of the registered vehicle owner and in compliance with all applicable federal, provincial and local regulations and/or statutes.

1.3. Procedures

1.3.1. To enroll in “the Registry”, a VSP/business must submit the following:

1.3.1.1. Completed and properly signed Application and User Agreement- (Registry Application and User Agreement).

1.3.1.2. All applicable supporting documents and fees

1.3.1.3. Canada Revenue Agency Employer Identification Number, where applicable, and/or Social Security Number.

1.3.1.4. Valid (unexpired) copy of all required Federal, Provincial and/or local governmental licenses, as required by local jurisdictions where the VSP plans to do business, including the provincial or Red Seal trades certificate of the applicant if applicable.

1.3.1.5. Valid (unexpired) copy of all required voluntary Trade Licenses/Certificate and/or Business Permits, as required by local jurisdiction, where applicable. A locksmith without a current trades license must prove two years experience.

1.3.1.6. A copy of required fidelity bond and/or liability insurance policies, showing a \$1,000,000 coverage or if an employee of the business, a \$100,000 employee dishonesty rider or policy inclusion.

1.3.2. During the application process, all VSP account applicants shall be required to submit all information required to successfully complete a criminal background check, and participate in a criminal background check process, along with their signed application, to “the Registry” for processing. Applicants will receive an e-mail message from the VSP Administrator advising them of the criminal check process. A tutorial for this process is posted on the VSP web site.

1.3.2.1. A VSP applicant will be background checked and a criminal background check will occur as per the procedures and to the standards established in- (Application Process for the VSP Registry).

1.3.2.2. A felony or equivalent criminal conviction may exclude an applicant. A past criminal conviction involving fraud, theft or vehicle related theft or similar conviction will exclude an applicant. Provincial convictions relating to automotive-based offenses will also exclude an applicant.

1.3.2.3. VSP account enrollment denials and VSP terminations may be appealed to the CASIS Executive Committee through the registry appeals process as outlined in- (Registry Denial and Dispute Resolution Appeal Process).

- 1.3.2.4.* A training course is being considered and if offered must be successfully completed by the applicant or VSP holder.
- 1.3.2.5.* VSP applicants, once approved, must agree that their business contact information be allowed to be published or shown on a web site, in order for vehicle owners to be able to better locate a nearby Vehicle Security Professional.

ATTACHMENT A - CONTACT INFORMATION

| CASIS | NATA | HARA/CIIA |
|---|---|---|
| CASIS is a voluntary agreement between four associations: | National Automotive Trades Association Rene Young | Collision Industry Information Assistance John Norris |
| CVMA | Attn: Executive Vice President | Attn: Executive Director |
| AIAMC | 8980 Fraserwood Crt, Suite 1 | P.O. Box 47594, Centre Mall. |
| AIA | Burnaby B.C. V5J 5H7 | Hamilton, ON L8H 7S7 |
| NATA | 604 432 7987 | 866 309 4272 |
| Contact is Rob Lang 604 273 1111 | | |
| rmworks@shaw.ca | reneyoung@nata.ca | johnnorris@ciia.com |
| • | Roles: <ul style="list-style-type: none"> • Program effectiveness • Program review • Service information requests • Industry Outreach | Roles: <ul style="list-style-type: none"> • VSP Administration • Dispute Resolution • Industry Awareness |

ATTACHMENT B - REGISTRY DENIAL AND DISPUTE RESOLUTION APPEAL PROCESS

An applicant or VSP account holder will have the right to appeal to the **CASIS Executive Committee** (a) a decision by the administrator of the VSP Registry to deny the applicant inclusion on the Registry, (b) a decision by the VSP Administrator to suspend or terminate an VSP# holder's rights with respect to the Registry, and (c) a denial by a Participating Automaker to permit access by the VSP account holder to Security Data on terms and conditions available to other VSP account holders.

RESPONSIBILITIES:

The responsibilities of the administrator and host of VSP Registry, include without limitation: (1) administering the application process, running background checks and making "go/no go" decisions on applicants based on criteria established by the CASIS Vehicle Security Committee and the CASIS Executive Committee, (2) acting as a clearinghouse for reports of improper use of the Registry and suspending and/or cancelling accounts in cases of reported impropriety

The CASIS Vehicle Security Committee, is responsible for reviewing and making final decisions on rejected, suspended, re-instated or terminated Registry applications.

Registry Denial Dispute Resolution Appeal Process

- 1) The Registry Denial Dispute Resolution Appeal (DRA) process will allow an applicant to submit the VSP Registry application and any additional information relevant to their circumstance to the CASIS Executive Committee for review and final determination. The DRA process is outlined below:
- 2) Applicant has ten (10) business days to make written notification of an appeal from the date the notice of their application denial is received.
- 3) Appeal must be addressed to the NATA Executive Vice-President at the address defined in Attachment A.
- 4) Appeal must be made in writing and sent as certified mail through the Canada Post service.
- 5) Appeal must include permission for CASIS to access and review the same information that caused the denial for inclusion in the VSP Registry.
- 6) Further, the appeal must acknowledge the determination of the CASIS Executive Committee is final and the individual will not seek any remedy, legal or otherwise, beyond the scope of the

DRA process. A denied applicant can not reapply for one (1) year from the date of receipt of the denied appeal decision.

- 7) The NATA Executive Vice-President or designee, upon receipt of the appeal, will request the Registry Administrator to provide electronic copies of supporting documents used to deny Registry access and will confirm that the supporting documents and application are complete and sufficient to begin the appeal process.
- 8) Once determined complete, this information will be forwarded to the CASIS Executive Committee opening the Dispute Resolution Appeal process.
- 9) The CASIS Executive Committee will convene a meeting within ten (10) business days of receipt of supporting information from the NATA Executive Vice-President or designee. The meeting can be by teleconference and will be recorded by a designee of CASIS. The VSP Administrator would not have a vote on an appeal.
- 10) The applicant will be notified of the CASIS decision within fourteen (14) days from the date of the CASIS appeal hearing. The notification will be sent to the applicant by certified mail through the Canada Post service.

ATTACHMENT C - Application Process for the VSP Registry VSP ACCOUNT HOLDER - Application Process

- 1) Only original signed and applications will be processed (*Registry Application and User Agreement*).
- 2) The following documentation must be provided with the application:
 - a) A signed, completed VSP Registry Application and User Agreement (*Registry Application and User Agreement*),
 - b) Suitable proof of identity,
 - c) Proof of suitable fidelity bond or liability insurance that covers all employees who will use information acquired from the VSP program as follows:
 - i) Liability insurance in the minimum amount of \$1,000,000 covering the business and all employees using information acquired through use of the Registry; and
 - ii) Fidelity or Employee Dishonesty Bond in the minimum amount of \$100,000 covering vehicle theft resulting from use of automotive security related service information acquired through use of the Registry or in lieu of the fidelity bond requirement, an inclusion or rider to an existing insurance policy in the minimum amount of \$100,000.
 - d) Full payment of fees including one time application fee.
- 3) Applicants will be notified via e-mail that their application has been received and will be processed within 3 business days if all documentation is received.
- 4) Applicants will be notified within 3 business days if additional documentation or information is required before their application can be processed. Incomplete applications will be held for 90 days awaiting completion – after 90 days, incomplete applications will be discarded.
- 5) Applications which meet all requirements will be processed within 72 business hours (in most cases).
- 6) Applicants will receive notification of the disposition of their application via telephone call and then registered mail.

Background Check Procedures and Criminal Record check

The Vehicle Security Professional program for Canada, has chosen to use “Backcheck” to provide the criminal record search for each applicant. Please refer to the “*How to Become an Applicant*” section on the VSP web site and the “Tutorials” section of the web site for a tutorial on how that process will operate. The Canada Post option is the process that will be used.

Cause for Adverse Action

- 1) Registry applicants shall be rejected for:
 - a) Felony convictions and/or criminal convictions relating to any types of theft, larceny, auto theft or fraud, including provincial violation conviction relating to automotive-based activity.
 - b) Intentional deceit in the application process (i.e. providing inaccurate information with the intent of hiding background information)
 - c) Failure to provide suitable proof of bonding/insurance requirements
 - d) Failure to provide proof of a valid business and/or business location or e-mail address.
 - e) Failure to provide proof of a valid locksmith license or locksmiths security validation, where required by provincial and/or local jurisdiction
 - f) Failure to provide provincial trades license as required for a restricted automotive trade or a locksmith trades license.
- 2) Registry applicants may be rejected for felony convictions and/or criminal convictions related to crimes of violence or crimes committed with deadly weapons.

Adverse Action Process

- 1) A letter will be sent to the applicant informing them of their right to repeat their reporting to “Backcheck” should a criminal record check show incomplete information. This incomplete information would identify that the applicant’s self-described criminal history was not consistent with the information obtained by “Backcheck”. The applicant must pay an additional fee of \$75 (plus HST) to cover the costs of a second “Backcheck” report. Should the applicant’s criminal history or otherwise incomplete report provide cause for rejection, a letter will be sent to the applicant advising them of a Cause for Adverse Action rejection from being able to be registered. Should the applicant be rejected at the time of initial application, fees would be returned less the criminal record search costs of \$75 (plus HST.)
- 2) This letter will be mailed within 5 business days of receipt of the “Backcheck” report, advising applicant of incomplete or adverse information. All correspondence will be maintained with the original application.