

WHITE CLOUD AGE VERIFICATION PROCESS

White Cloud is an industry leader, committed to ensuring e-cigarettes and all vapor products are marketed and sold solely to the adult community. In 2014, our company implemented a strict age verification process for its online store; however, advancements in technology and internet anonymity have presented significant challenges to the functionality of the age verification process in an e-commerce world. In light of this, White Cloud has enlisted LexisNexis to aid in the effort to protect minors and prevent identity theft.

LexisNexis maintains an extensive and continually updated database of more than 78 billion public records, including government issued identification cards and Department of Motor Vehicle files, and utilizes this information to resolve, match and manage information for more than 274 million consumer identities in the United States. Customers purchasing products from White Cloud must provide specific personal information that is processed by LexisNexis to confirm the age and identity of the potential customer. Orders are processed and fulfilled only when the age of the purchaser has been verified.

HOW WHITE CLOUD'S AGE VERIFICATION PROCESS WORKS

1. The purchase of products from White Cloud requires all customers to create an account, providing their full name, telephone number, email address, shipping address and billing address. Customers must access their account in order to submit an order.
2. Once an order is submitted, LexisNexis will cross reference the customer's credentials with their extensive database of consumer records and federal, state and local laws to generate a list of potential matches.
3. LexisNexis routinely updates its database with new or amended laws and rules at federal, state and local levels, guaranteeing continual compliance.
4. Each transaction receives a pass or fail determination from LexisNexis. A fail will be issued when a match has omitted a date of birth or when a match suggests the customer is underage, thus forcing a manual age verification completed by a White Cloud employee.

HOW DO LEXISNEXIS AND WHITE CLOUD COMMUNICATE?

1. What information does White Cloud send to LexisNexis?

In order to properly conduct its search, LexisNexis requires the customer's billing name and address, as well as White Cloud's security credentials.

2. How does White Cloud send information to LexisNexis?

White Cloud communicates with LexisNexis through an encrypted digital communication (API), which sends a secure document (XML) containing the customer's pertinent information.

3. How does White Cloud ensure security?

White Cloud utilizes a secure network with dedicated IP addresses for the transmission of private information to LexisNexis. Employees must be physically present at the proper White Cloud location to access this network and to transmit data to LexisNexis.

4. What does LexisNexis send to White Cloud and how does it affect the purchase process?

After LexisNexis compares, sorts and matches the data provided by White Cloud with its database, a pass or fail determination will be provided. When the determination is labelled "pass," LexisNexis provides a LexID which is added to the purchaser's account, allowing the order to be processed. A "fail" determination by LexisNexis forces a manual age verification process to be conducted by a White Cloud employee and will

place the order on hold until the manual verification is complete.

WHAT HAPPENS IF LEXISNEXIS CANNOT VERIFY AGE

1. When LexisNexis issues a fail determination from an automated search, a White Cloud employee must manually verify the age of the customer before the purchase may be processed and fulfilled.
2. The White Cloud employee also utilizes the LexisNexis system to verify age, but conducts a manual search based on the customer's billing name and address.
3. Once LexisNexis generates a list of matches or partial matches, the employee must then review each listing to identify the specific customer attempting to purchase the product.
4. When the manual process confirms a match and verifies the age of the potential customer, a LexID is applied to that customer's account, allowing the purchase to be processed and shipped.

WHAT HAPPENS IF WHITE CLOUD IS UNABLE TO VERIFY THE AGE OF A CUSTOMER?

1. Should the manual verification process through LexisNexis fail, White Cloud sends an email to the customer requesting more data for the search, including previous addresses or a copy of a government issued photo ID.
2. A White Cloud employee will reinstitute the manual verification process with LexisNexis, conducting a new search based on the previous address.
3. When a manual verification process using a previous address also fails, the customer must provide a valid government issued photo ID.
4. LexisNexis will issue LexIDs for customers whose age has been verified and deemed a pass through either the initial search or through the manual process conducted by White Cloud employees. This LexID is stored in the customer's account for future use.
5. If the manual process is unable to verify the age of a customer, and the customer neglects to respond to age verification emails sent by White Cloud, the order is cancelled and any amounts paid by the customer for that specific purchase are refunded to the original payment method.

White Cloud is a proven advocate for keeping all vapor products inaccessible to today's youth. Our industry must adhere to many laws and regulations that vary from state to state and are continually being amended as new legislation is introduced. To that end, our company closely monitors all purchases for proper age verification, either through automated or manual methods. When any state, county, or city law or regulation is amended, any customer located in the affected jurisdiction loses the LexID associated with their account, and the age verification process must again be completed contingent on these new terms before any future purchases may be fulfilled.

The age verification process is vital to the elimination of underage vaping. White Cloud will not hesitate to reject any orders from customers who may be of legal age, but have not cleared the company's strict age verification process, either through our inability to properly match customer information with a LexisNexis profile, or ultimately, the customer's refusal to provide a valid, government issued photo ID.

White Cloud is grateful for its partnership with LexisNexis and the transparency of its unwavering commitment to ending youth vaping.