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# **WHITE CLOUD**

## **AGE VERIFICATION PROCESS**



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## AGE VERIFICATION PROCESS

White Cloud is proud to be a leader in the effort to keep e-cigarettes out of the hands of minors. As part of our commitment to marketing exclusively to adults, we implemented a strict age verification process for our online store back in 2014. We realize that the anonymity of the internet presents many challenges to age verification, which is why we've teamed up with experts at LexisNexis to protect minors and prevent identity fraud.

With its database of more than 78 billion public records, including government issued IDs and DMV records, LexisNexis can resolve, match and manage information for more than 274 million U.S. consumer identities. Before customers can purchase e-cigs and other vapor products from White Cloud, the personal information they provide is checked against the LexisNexis database. Orders can only be completed if the age of the buyer can be verified.



# **HOW WHITE CLOUD'S**

## **AGE VERIFICATION PROCESS WORKS**



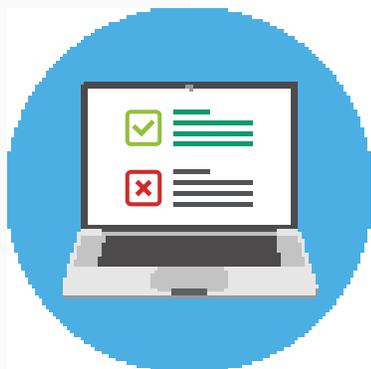
**1. Before customers can place orders online**, they must create an account and provide their name, phone number and email address in addition to billing and shipping addresses. Purchasers must be logged in to place and submit an order.



**2. Once the order is submitted**, LexisNexis compares the purchaser's information (billing name and address) with the LexisNexis database system.



**3. LexisNexis attempts to verify age** based on the information received, individual state's age requirements and other rules set by LexisNexis. As new laws are passed, new rules are added and old ones are updated to remain compliant.



**4. LexisNexis will either pass, or fail**, the transaction depending on the information provided. LexisNexis will provide a "fail" if a match is found that doesn't include a date of birth, or if a match suggests the person is underage.



# **HOW DOES LEXISNEXIS AND WHITE CLOUD COMMUNICATE?**



## **HOW DOES WHITE CLOUD SEND INFORMATION TO LEXISNEXIS?**

White Cloud uses an encrypted digital communication (API) that sends a secure document (XML) containing your name and address.



## **WHAT INFORMATION DOES WHITE CLOUD SEND TO LEXISNEXIS?**

The secure (XML) document passed to LexisNexis during the transmission includes White Cloud's security credentials along with the supplied billing name and address from the online order.



## **HOW DOES WHITE CLOUD ENSURE SECURITY?**

Only certain White Cloud IP addresses are approved to send the call to LexisNexis. This means a White Cloud employee must be in our building and on our network in order to communicate with LexisNexis.



## **WHAT DOES LEXISNEXIS SEND TO WHITE CLOUD?**

LexisNexis responds with a pass or fail. If the response is "pass," the LexID is added to the purchaser's account. If a response is "fail," our system places the purchase into "Age Verification" status to allow the manual process to begin.



# **HOW DOES WHITE CLOUD**

**DETERMINE LEGAL AGE PER CUSTOMER?**



**1. In order to remain compliant with local laws,**

White Cloud verifies the age requirement for each purchase based on the following billing information provided by the customer:

- **The purchaser's State**
- **The purchaser's City**
- **The purchaser's County**



**2. White Cloud uses the following resources** for each state, city and county to determine the proper legal age:

- **We Card Now**
- **Tobacco 21**
- **State Departments of Motor Vehicles, Drivers License Divisions**



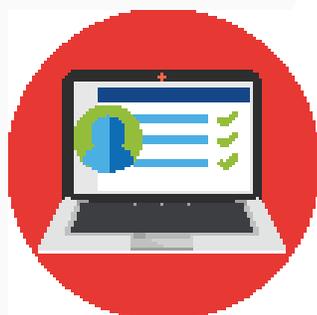
# **WHAT HAPPENS IF LEXISNEXIS CANNOT VERIFY AGE?**



**1. If LexisNexis cannot automatically verify** a customer's age, a White Cloud employee will manually attempt to verify age by logging into the LexisNexis site to perform a search for the customer.



**2. The White Cloud employee uses the information** provided by the purchaser (billing name and address) and inputs this information into the appropriate fields.



**3. The White Cloud employee attempts to verify** the information in the LexisNexis database with the supplied purchaser information by reviewing each listing provided by LexisNexis that returned a match or partial match on any variable entered.



**4. If the White Cloud employee confirms a match** and verifies age, the LexID and date obtained is entered into the purchaser's account.



**5. The purchase is then processed to ship.**

**WHAT HAPPENS IF A  
WHITE CLOUD EMPLOYEE CANNOT VERIFY AGE?**



**1. White Cloud** sends an email to the purchaser requesting either a previous address or a copy of a government-issued photo ID.



**2. If the purchaser** supplies a past address, the White Cloud employee follows the same manual process described above by logging in and conducting a new search.

*\* Note: Manual attempts to verify age may include several profiles. Only the LexID of the profile with the customer's age is used.*



**3. If the White Cloud employee** cannot verify age based on a previous address, the customer must produce a valid government-issued photo ID.



**4. If age is verified** using the options above, the purchaser's order is approved, and the order is shipped. The LexID is stored in the purchaser's account.



**5. If a purchaser** does not respond to the age verification emails, or if age is unable to be verified by a White Cloud employee, the purchase is cancelled and refunded in whole to the original payment method used.

White Cloud monitors all purchases using automatic and manual methods. Whenever there is a change to the legal age of any state, city or county, White Cloud wipes the LexIDs of affected customers. Each customer in that location must then pass through the age verification process again before their next purchase can be completed. The entire process repeats until all affected purchasers are re-verified.

White Cloud compiles and reviews reports on age verification activities to ensure the process continues to stop all underage purchasers from obtaining our products. In our efforts to eliminate youth vaping, we also have and must reject purchases from those who are of legal age but that White Cloud cannot verify, either by the purchaser's refusal to supply proof, or our inability to properly match the supplied information with a LexisNexis profile.

We are grateful for our partnership with LexisNexis, and we are proud to be transparent about our ironclad commitment to never sell to underage persons.

## **CONTACT US**

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## **VISIT OUR WEBSITE**

[www.whitecloudelectroniccigarettes.com](http://www.whitecloudelectroniccigarettes.com)

