



OUTBOUND COMMUNICATIONS GUIDE

BEST PRACTICES IN OUTBOUND COMMUNICATIONS

2025

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COMMUNICATIONS WITH AGENTS, POLICYHOLDERS & CONSUMERS



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SECTION 1: GENERAL GUIDELINES & DEFINITIONS

Outbound communication with agents, policyholders and consumers is critical for the success of our business and for our customers. The following guidance is designed to follow all applicable regulatory requirements covering insurance marketing organizations. The following guidelines do not supersede the Medicare Advantage and Prescription Drug Plan, Medicare Communication and Marketing Guidelines.

CALLS AND RELATED MEDIA

1.1 MANUAL CALLS

A **manual call** is a call that is dialed by a live person manually by typing in a number into a dialing device or by selecting a number on screen and clicking a button to activate a call. Manual calls do not include calls made with the assistance of an automatic telephone dialing system (ATDS).

Informational call is a manual call for *exclusively* informational purposes concerning a transaction or services already requested or purchased and that is not encouraging enrollment in or the purchase of new goods or services. These calls may be made at any reasonable time, including to individuals who are on the federal Do-Not-Call Registry (DNC Registry).

Identification of caller is critical for any personnel making a call for telemarketing purposes. Such caller must provide the recipient with the name of the individual caller, the name of the person/entity on whose behalf the call is made (i.e., Partner), and a telephone number or address at which the person or entity may be contacted.

Solicitation calls done manually for the ultimate purpose of encouraging the purchase of insurance or financial products or services are considered solicitation calls. Calls for surveying or informational calls that could result in the eventual purchase of insurance or financial products are considered solicitation calls.

SECTION 1: GENERAL GUIDELINES & DEFINITIONS

1.2 DO NOT CALL REGISTRY

The **National Do Not Call Registry (DNC)** is a list of phone numbers from consumers who have indicated their preference to limit the telemarketing calls they receive. The registry and the rules that surround the registry and telemarketing are regulated by the Federal Trade Commission (FTC). Compliance with the DNC is enforced federally by the FTC and the Federal Communications Commission ("FCC"), and additionally some states have their own registration lists.

The types of calls covered by the National DNC Registry include any plan, program, or campaign to sell goods or services through phone communication. This includes calls by telemarketers who solicit consumers, often on behalf of third-party sellers.

Examples of calls covered by the DNC Registry include outbound telephone calls:

- to set appointments for sales presentations
- introducing products or services or inquiring regarding the recipient's need for any other products or services
- describing business opportunities
- providing consumer advice on products or services
- conducting a survey that may ultimately lead to the sale of products or services

Numbers Not Listed on DNC Registry

Solicitation calls to numbers that are not listed on the federal or state DNC registry are permitted if made during permissible hours. Permissible hours are described in section 1.10 below.

Listed on DNC Registry

For numbers that are listed on a federal or state DNC registry, a solicitation call is permitted only with the recipient's prior express invitation or permission or to a recipient with whom the caller has an established business relationship.

SECTION 1: GENERAL GUIDELINES & DEFINITIONS

An “established business relationship” exists where:

- the recipient transacted business with the caller in the 18 months before the call or
- on the basis of the recipient’s inquiry or application regarding products or services offered by the caller within three months preceding the call.

Opt-out requests may terminate an established business relationship.

1.3 CALLS VIA AN AUTODIALER

ATDS or autodialer. An automatic telephone dialing system (ATDS), also referred to as an autodialer, is equipment which has the capacity to store or produce telephone numbers to be called using a random or sequential number generator and to dial such numbers. Generally, ATDS should not be used for calls by the Partner or its agents. To the extent that a dialer is used for making calls, all functionality that stores or produces random or sequential numbers should be disabled.

Consent required. Calls that are made with the use of an autodialer may not be placed to a phone number unless there is a valid consent on file from the recipient. If the call is made for advertising or telemarketing purposes, a “prior express written consent” is required. If the call is made for exclusively other purposes, then a “prior express consent” is required. Consents are discussed in section 1.8 of this guide. “Telemarketing” means encouraging the purchase of goods or services.

Reassigned Numbers Database (“RND”). In addition to obtaining the appropriate consent for calls made with the use of an autodialer, the caller must scrub the number against the RND to check whether the number has been reassigned to another individual. If the number has been reassigned, the call cannot be made. The RND was created by the FCC and is available at <https://www.reassigned.us/>.

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1.4 CALL ABANDONMENT

Unanswered Telemarketing Calls

If a telemarketing call is not answered, it may not be disconnected prior to at least 15 seconds or 4 rings.

Answered Telemarketing Calls

For telemarketing calls that are answered, there should be no more than 3% abandoned (i.e., not connected to a live person) for any 30-day period. If a live representative is not available to speak with the person answering the call, the caller must provide within 2 seconds, either (i) a recording stating that the call was for telemarketing purposes, identifying the caller, and providing a phone number for do-not-call request, or (ii) an interactive menu allowing the recipient to opt out.

1.5 ARTIFICIAL OR PRERECORDED VOICE CALLS

Outbound communication terms and definitions are specific to this policy and guidance.

Consent Required for All Numbers

Calls that employ artificial or prerecorded voice may not be placed to a mobile number or a landline unless there is a valid consent on file from the recipient. If the call is made for advertising or telemarketing purposes, a prior express written consent is required. If the call is made for exclusively other purposes, then a prior express consent is required. Consents are discussed in section 1.8 of this guide.

Required Content

All artificial or prerecorded voice telephone messages must do the following:

- At the beginning of the message, identify the caller, including the state in which the business entity is domesticated;
- During or after the message, provide the caller's contact number, allowing the recipient to to opt out; and
- If the message includes an advertisement or telemarketing, provide an interactive and functioning opt-out mechanism (or, if left on a voicemail, a phone number with an interactive opt-out mechanism).

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Reassigned Numbers Database. In addition to obtaining the appropriate consent for calls made with the use of prerecorded or artificial voice, the caller must scrub the number against the RND to check if the number has been reassigned to another individual. If the number has been reassigned, the call cannot be made. The RND was created by the FCC and is available at <https://www.reassigned.us/>.

1.6 TEXT MESSAGES AND RINGLESS VOICEMAILS

Consent Required

Generally, as with autodialer calls, mass texts and ringless voicemails may not be sent to any recipients who did not provide the appropriate consent to receive such communication. If the text or voicemail is delivered for advertising or telemarketing purposes, a prior express written consent is required. If the text or voicemail is delivered for exclusively other purposes, then a prior express consent is required. Consents are discussed in section 1.8 of this guide.

Reassigned Numbers Database. In addition to obtaining the appropriate consent for mass texts or ringless voicemails, the caller must scrub the number against the RND to check if the number has been reassigned to another individual. If the number has been reassigned, the communication cannot be made. The RND was created by the FCC and is available at <https://www.reassigned.us/>.

1.7 FAXING

Established Business Relationship and Permissible Source

Unsolicited advertisements may only be sent to recipients with whom the sender has an established, existing business relationship, defined as voluntary relationship established by two-way communication between the entity and the person.

Additionally, the fax number must have been obtained from the recipient in the context of the relationship, or else from a directory, advertisement, or website to which the recipient provided the number.

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Opt-Out Notice and Mechanism The unsolicited advertisement must conspicuously (on first page) inform the recipient of the ability and means to avoid future unsolicited advertisements, including a toll-free phone number. The sender must honor all opt-out requests.

1.8 CONSENTS

Express Invitation or Permission

A signed, written agreement (can be digital) between the consumer and seller, which states that the consumer agrees to be contacted by this seller and includes the pertinent telephone number.

Prior Express Consent

A prior express consent is any provision (written or oral) of consent to receive calls at a particular phone number. Generally, when a consumer knowingly provides a phone number to a business, the consumer gives permission to send commercial calls or messages to the number provided for the purpose for which the number was provided.

Prior Express Written Consent

A prior express written consent is an agreement, in writing and signed (or e-signed), that authorizes the seller to deliver to the person called advertisements or telemarketing messages using an autodialer or an artificial or prerecorded voice, and the telephone number to which the signatory authorizes the messages to be delivered. The consent form may not identify more than one caller unless the recipient checks a box next to each additional caller. The written agreement must include clear and conspicuous disclosures that include the following:

- i. the recipient authorizes the seller to deliver or cause to be delivered telemarketing calls using an autodialer or artificial or prerecorded voice, and
- ii. the recipient is not required to sign the agreement as a condition of purchasing any good or service

Revocation

A consent may be revoked at any time by the person who provided the consent.

SECTION 1: GENERAL GUIDELINES & DEFINITIONS

Summary The following chart summarizes the consent types and the permitted communications for each type of consent.

No Consent

Description	No previous contact with recipient, or Some previous contact but recipient did not provide consent to be contacted or his/her contact information.
Permitted Communications	<ul style="list-style-type: none">• Manual call• Autodialer call to a landline number• Direct mailing• Email• Social media <p>Calls may be made only during permissible hours and to numbers not on the DNC Registry.</p>

Express Invitation or Permission

Description	A signed, written agreement (can be digital) between the consumer and seller, which states that the consumer agrees to be contacted by this seller and includes the pertinent telephone number.
Permitted Communications	<ul style="list-style-type: none">• Any communication that is permitted without consent.• Manual call to a number that is on the DNC Registry.• These numbers need to be scrubbed against the RND before the above communications occur.• All communications must be within the scope of the consent provided.

SECTION 1: GENERAL GUIDELINES & DEFINITIONS

Prior Express Consent

Description	Recipient provides consent to be contacted by providing his/her contact information or indicating orally or in writing his/her willingness to be contacted.
Permitted Communications	<ul style="list-style-type: none"> Any communication that is permitted without consent Non-telemarketing, non-advertising call or text to a mobile number with the use of autodialer, artificial or prerecorded voice, or ringless voicemail Marketing call or text to a landline with the use of autodialer These numbers need to be scrubbed against the RND before the above communications occur. All communications must be within the scope of the consent provided (e.g., if recipient provided phone number while looking for health insurance, a ringless voicemail regarding annuities would be outside the scope of consent)

Prior Express Written Consent

Description	<p>Written agreement that is signed (or e-signed), authorizing the company to deliver to the recipient advertisements or telemarketing messages using an autodialer or an artificial or prerecorded voice.</p> <p>The written agreement must clearly and conspicuously state that</p> <ul style="list-style-type: none"> The recipient authorizes the company to deliver or cause to be delivered advertisements or telemarketing messages using an autodialer or an artificial or prerecorded voice and The recipient is not required to sign the agreement as a condition of purchasing any good or service.
Permitted Communications	<ul style="list-style-type: none"> Any communication that is permitted with prior express consent Telemarketing or advertising call or text to mobile or landline number with the use of artificial or prerecorded voice, or ringless voicemail Telemarketing or advertising call or text to a mobile number with the use of autodialer These numbers need to be scrubbed against the RND before the above communications occur.

SECTION 1: GENERAL GUIDELINES & DEFINITIONS

1.9 EMAIL MESSAGES

Not Misleading

Emails should not be misleading in any way. The header information, the subject line, and the “from” line should not contain any inaccurate, deceptive, or misleading information.

Required Content: Identifier, Opt-Out, and Physical Address

The email must contain a clear identification that the message is an advertisement or solicitation, a valid opt-out mechanism, and a valid physical postal address of the sender.

Opt-Out Screening

Emails may not be sent to addresses that opt-out of email communications.

1.10 PERMISSIBLE HOURS

The permitted hours under federal law are between 8 a.m. and 9 p.m. The caller should consult the state law for the recipient to determine the permissible hours for calls in the recipient’s state. Most states permit calls made on weekdays between 9 a.m. and 6 p.m.

1.11 NO CALLER ID SPOOFING

When calling or texting, the use of spoofing (i.e., displaying a caller ID number that is different from the caller’s number) is discouraged. If using spoofing, the caller ID number should be a number that would allow the recipient to reach an individual or a system that would identify the caller and allow the recipient to opt out of future communications. When calling or texting, the caller ID number should not be blocked or set to “private.”

SECTION 2: COMMUNICATIONS WITH AGENTS

2.1 COMMUNICATIONS WITH EXISTING AGENTS

A business relationship with an agent is created when a prospective agent agrees to contract with or sell for the agency or has asked to be placed on company distribution lists. This business relationship allows outbound communication including both manual and automated communication; provided the agent has not asked to be taken off marketing communication via an opt-out request.

Allowable communication includes the following (including for marketing purposes):

- manual cell phone calls and texts
- an autodialer call to a landline number
- direct mailing
- email
- social media

Automated message, prerecorded message, and ringless voicemail communications are allowed if there is prior express written consent from the agent to receive automated messages. These restricted automated messages include automated calls, texts, prerecorded voice messages or ringless voicemails to cell phones.

Consent for automated communication to existing agents can be obtained by adding a disclosure message addressing the automated communications to an agent onboarding form, website acknowledgement or online web form.

Sample agent consent for automated messaging

"I understand that the company may deliver advertisements or telemarketing messages using an autodialer, an artificial or prerecorded voice message, or SMS text message regarding information or opportunities with the company. I also understand that this is not a condition of receiving services or products from the company."

SECTION 2: COMMUNICATIONS WITH AGENTS

2.2 COMMUNICATIONS WITH PROSPECTIVE AGENTS

Agent Leads Without Consent

For agent leads where the recipient did not provide any consent to be contacted about the sales of insurance products (including from lists obtained from departments of insurance), the only permissible communications are:

- a manual call or text
- an autodialer call to a landline number
- direct mailing
- email
- social media

Any call may be made only during permissible hours and only to numbers that are not on the DNC Registry. Any email must be compliant with the Communication Guidelines.

Automated communications to a mobile number of a prospective agent (lead) must have prior express written consent to the outbound automated communication, even if the call is from one business to another business.

Obtaining Consent

To obtain consent to receive texts, send an email to agents and ask them to consent to marketing by "Text AGENT to 22543". To be considered prior express written consent for other communications as well, this email must also include the following.

I understand that the company may deliver advertisements or telemarketing messages using an autodialer, an artificial or prerecorded voice message, or SMS text message regarding information or opportunities with the company. I also understand that this is not a condition of receiving services or products from the company provide the ability to unsubscribe.

If we do not intend to use some of the specific communication technologies described in the consent language, then the language can be modified for the specific marketing plans. The email subject must not be misleading.

SECTION 2: COMMUNICATIONS WITH AGENTS

Agent Leads With Consent

If a consent is obtained, communication may be made within the scope of such consent. For example, “blast” texts offering the sale of leads to agents may only be sent to agents that consented in writing to receive telemarketing texts from the company or its affiliate. The consent summary table in section 1.8 outlines permitted communications by consent type.

Consent Revocation

When an agent requests not to be contacted, such agent’s information must be removed from the agent contact list and not contacted in the future.

SECTION 3: COMMUNICATIONS WITH POLICYHOLDERS & CONSUMERS

3.1 COMMUNICATION WITH POLICYHOLDERS

Communications With Consent

Policyholders often provide either a prior express consent or a prior express written consent to be contacted in connection with insurance products. We may contact such policyholders via methods that are permissible under the consent that is granted. For example, if a policyholder provided his/her phone number to the company for the purpose of obtaining information regarding insurance products, the company may contact the policyholder by methods that require prior express consent. While consents generally do not expire, the company should make reasonable effort to ensure that applicable consents have been granted or re-affirmed in the 18 months preceding the outbound communication. The consent summary table in section 1.8 outlines permitted communications by consent type.

Established Business Relationship and Consent

New policyholders who obtain an insurance policy through the company are considered to be in an “established business relationship” with the company for 18 months following the purchase/transaction. During this time, unless a policyholder requests to opt out from communications, policyholders may be called manually for solicitation even if they are on the DNC Registry.

After 18 months pass, the policyholder may be contacted within the scope of the consent from such policyholder but not to market additional products. For example, if a person provides a phone number to the company for the purpose of obtaining information regarding insurance policies, and then purchases an insurance policy, the person may be contacted with information regarding insurance policies after the 18-month business relationship expires, based on the original consent.

3.2 COMMUNICATIONS WITH CONSUMERS

Consumer Leads Without Consent

For leads where the recipient did not provide any consent to be contacted about insurance products, the only permissible communications are as follows:

- a manual call (if number is not on the DNC Registry)
- an autodialer call to a landline number

SECTION 3: COMMUNICATIONS WITH POLICYHOLDERS & CONSUMERS

- direct mailing
- email
- social media

Permissible calls may be made only during permissible hours and only to numbers that are not on the DNC Registry. Any email must be compliant with the Communication Guidelines. The consent summary table in section 1.8 outlines permitted communications by consent type.

Consent for outbound telemarketing can be obtained with a suitable business reply card, digital lead, or website form.

Consumer Leads With Consent

Communication to prospective consumers who provided a consent to be contacted (e.g., by responding to a direct mailer or filling out a quote request online) must be within the scope of the consent. For example, if the prospective consumer's only consent is the provision of a phone number, such consent is not a prior express written consent. Without prior express written consent, telemarketing or advertising calls to a recipient may not be made with the assistance of an autodialer or artificial or prerecorded voice. The consent summary table in section 1.8 outlines permitted communications by consent type.

Automatic Assistance Line for Inbound Calls

A phone/contact number may be established to allow consumers to dial the number to obtain or provide information regarding the purchase of insurance, whether via an automatic process or by speaking with a representative. This type of marketing doesn't require any type of prior express consent.

SECTION 4: OPT-OUT REQUESTS

Opt-Out Request Interpretation

Any request, whether written, oral, or electronic, that can be reasonably interpreted to be a request not to be contacted in the future, should be treated as an opt-out request from future communications. For example, if the recipient states that they “would prefer not to receive calls about this,” the request should be interpreted as an opt-out request for all future solicitation communications, including calls and texts.

Recording Requests

A request by any individual to be excluded from any future communications must be recorded and maintained in an opt-out log. Recorded opt-out logs must be retained for a period of not less than ten (10) years.

Executing Requests

The caller must have a mechanism in place to implement recipient’s opt-out requests within seven (7) days. For requests to “unsubscribe” or opt-out of email marketing communications, requests must be honored within ten (10) days.

Reviewing Opt-Out Logs

A report summarizing opt-out requests should be reviewed by the Compliance Officer regularly to monitor for increases in opt-out requests that may indicate that a change in outbound communication practices is required.

SECTION 5: OBTAINING & MAINTAINING APPROPRIATE CONSENTS

Confirm Valid Consents Prior to making an outbound communication that requires prior consent from the recipient, caller/telemarketer must ensure that such consent is present and that such consent has not been revoked by an opt-out request.

No Consent

Agent Example	Prospective agent's contact information is posted on a Department of Insurance website or provided from a vendor.
Consumer Example	Consumer's contact information is provided to the company by a friend as a potential referral.
Consent Description	<p>You have no previous contact with recipient, or</p> <ul style="list-style-type: none"> • Some previous contact but recipient did not provide consent to be contacted or his/her contact information.
Permitted Communications	<ul style="list-style-type: none"> • Manual call • Autodialer call to a landline number • Direct mailing • Email • Social media <p>Calls may be made only during permissible hours and to numbers not on the DNC Registry.</p>

Express Invitation or Permission

Agent Example	An agent responds to a marketing email and provides a phone number to be contacted.
Consumer Example	A consumer sends back a business reply card with their phone number.
Consent Description	A signed, written agreement (can be digital) between the consumer and seller which states that the consumer agrees to be contacted by this seller and includes the pertinent telephone number.
Permitted Communications	<ul style="list-style-type: none"> • Any communication that is permitted without consent or with prior express consent • Manual call to a number that is on the DNC Registry

SECTION 5: OBTAINING & MAINTAINING APPROPRIATE CONSENTS

Prior Express Consent

Agent Example	Agent provides agent's phone number on agency's online form for agents interested in working with the company.
Consumer Example	Consumer states on the phone that they would like to receive future communications about products; or consumer mails back a business reply card that contains the consumer's phone number but does not contain the language required for a prior express written consent.
Consent Description	Recipient provides consent to be contacted by providing his/her contact information or indicating orally or in writing his/her willingness to be contacted.
Permitted Communications	<ul style="list-style-type: none"> • Any communication that is permitted without consent • Non-telemarketing, non-advertising call or text to a mobile number with the use of autodialer, artificial or prerecorded voice, or ringless voicemail • Marketing call or text to a landline with the use of autodialer • These numbers need to be scrubbed against the RND before the above communications occur

Prior Express Written Consent

Agent Example	Agent provides their phone number on an online form for agents interested in working with the company, which among other things states, "I understand that Partner may deliver advertisements or telemarketing messages using an autodialer, an artificial or prerecorded voice, or SMS text messages regarding opportunities for agents with Partner. This authorization is not a condition of purchasing any good or service."
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SECTION 5: OBTAINING & MAINTAINING APPROPRIATE CONSENTS

Consumer Example	Consumer fills out a direct mail response card with their contact information, and checks a box that states "I would like to receive information regarding insurance products that are relevant to me at the number below, which may include advertisements or telemarketing messages using an autodialer, an artificial or prerecorded voice, or SMS text messages. This authorization is not a condition of purchasing any good or service."
Consent Description	<p>Written agreement that is signed (or e-signed), authorizing the company to deliver to the recipient advertisements or telemarketing messages using an autodialer or an artificial or prerecorded voice. The consent form may not identify more than one caller unless the recipient checks a box next to each additional caller.</p> <p>The written agreement must clearly and conspicuously state that</p> <ul style="list-style-type: none"> • The recipient authorizes advertisements or telemarketing to be delivered by company using an autodialer or an artificial or prerecorded voice • The recipient is not required to sign the agreement as a condition of purchasing any good or service
Permitted Communications	<ul style="list-style-type: none"> • Any communication that is permitted with prior express consent or prior express invitation • Telemarketing or advertising call or text to mobile or landline number with the use of artificial or prerecorded voice, or ringless voicemail • Telemarketing or advertising call or text to a mobile number with the use of autodialer • Call to a landline with the use of artificial or prerecorded voice • These numbers need to be scrubbed against the RND before the above communications occur

SECTION 6: LEAD GENERATION, ACQUISITIONS, & SALES

Lead Generation by Partner Any communication made for the purpose of generating “leads” (i.e., contact information for (i) consumers interested in receiving information about insurance products or (ii) agents interested in receiving information about Partner) must comply with the Communication Guidelines. Most commonly, leads are generated via direct mailing, social media campaigns, and referrals.

When leads are generated by phone, only the following methods of communication may be used: (i) a manual call, or (ii) an autodialer call to a landline number.

Any call may be made only during permissible hours and only to numbers that are not on the DNC Registry. All leads generated must comply with state privacy laws, such as the California Consumer Privacy Act of 2018 (CCPA), including the provision of a notice to the individual about how personal information about them is used and disclosed. For additional information please contact your compliance officer.

Lead Acquisition by Partner

This section governs all leads purchased by the company, including leads that are purchased for the purpose of reselling the leads to agents. Leads may be purchased only from sources that follow the same practices as those outlined in the Communication Guidelines. Prior to acquiring leads from a lead vendor, partner must confirm that the leads were generated in a manner that would not violate this Policy if they were generated by the company.

The table below summarizes the notable considerations when acquiring leads from vendors, by medium type. Partner may purchase leads from a vendor only if the vendor has been approved and onboarded in conjunction with the Integrity Legal department according to the Integrity Third Party Risk Management Policy (P1012).

Please refer to Integrity’s reference document on Do’s and Don’ts with respect to lead acquisition.

SECTION 6: LEAD GENERATION, ACQUISITIONS, & SALES

Source of Leads	Notable Considerations
Direct Mailing	<ul style="list-style-type: none">• Communication should not be deceptive.• Mailed card should include adequate consent to be contacted.
Social Media	<ul style="list-style-type: none">• Communication should not be deceptive.• Online form should include adequate consent to be contacted.
Telemarketing	<ul style="list-style-type: none">• Numbers should be scrubbed against the DNC Registry.• No use of auto dialer for mobile numbers.• No use of prerecorded or artificial voice messages.

Lead Acquisition by Agents Where partner assists agents in the selection of lead vendors, the vendor must comply with the standards discussed in *Lead Acquisition by Partner* in section 6 above.

Lead Sales by Partner

Partner may sell leads to other parties, including to independent agents, only if they have coordinated with Integrity Legal department to obtain an executed a Lead Sales Agreement with the buying party or parties.

Selling Leads to Multiple Parties

Where partner sells a lead to multiple parties, partner must comply with all consumer opt-out requests received directly by the partner or relayed to partner by any lead purchaser. Leads for consumers requesting to opt-out of all future communication should be removed from lead inventory and not sold to subsequent lead purchasers.

Lead Generation and Sales in California, Colorado, Connecticut, Utah, and Virginia

Lead generation and sales practices must comply with the state privacy laws, including those that have gone into effect between 2020 and 2023: California, Colorado, Connecticut, Utah, and Virginia. A partner that generates consumer or agent leads from residents in these states must comply with all requirements under these laws, including the following:

Post and regularly update a privacy notice on partner's website, maintain a public-facing mechanism for consumers to submit data-related requests (e.g., right to access, correct, or delete their personal information or opt out of the "sale" or "sharing" of personal information), and maintain internal mechanisms to handle such requests. For more information regarding the state privacy laws, please refer to the Requests Playbook and [INSERT SOURCE FOR PRIVACY NOTICE].

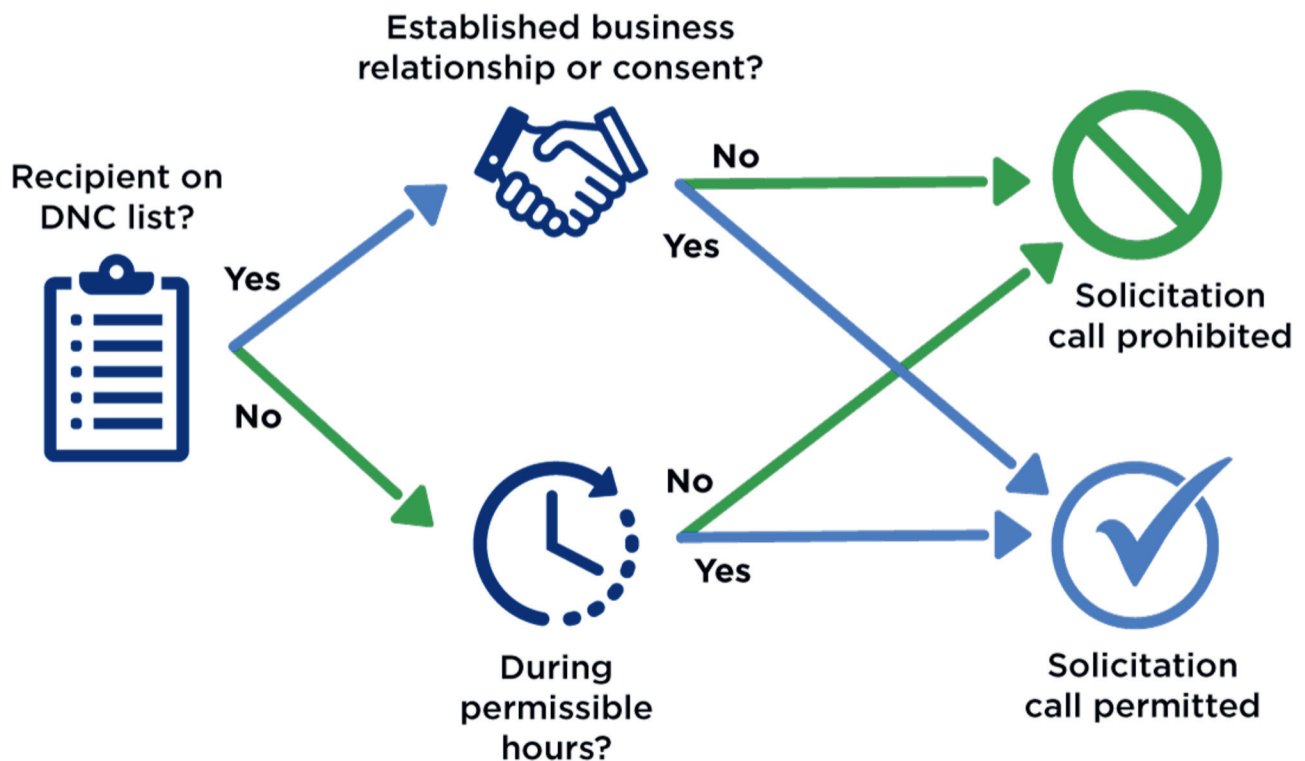
SECTION 7: TRAINING

Employee Training All partner staff receive training on outbound communications at hiring and on an annual basis. Such training includes this Policy, including the Communication Guidelines.

SECTION 8: OUTBOUND COMMUNICATION FLOW CHART

MANUAL SOLICITATION CALLS

Overview: Manual Solicitation Calls



SECTION 9: RESOURCES

National Do Not Call Registry

DNC Registry database: <https://telemarketing.donotcall.gov/>

DNC Registry Q&A for telemarketers (note that this guidance discusses the Telemarketing Sales Rule, without address additional requirements under the TCPA, such as compliance requirements for business-to-business calls):

<https://www.ftc.gov/tips-advice/business-center/guidance/qa-telemarketers-sellers-about-dnc-provisions-tsr#callsandorgs>

DNC Registry

The DNC Registry is available at: <https://telemarketing.donotcall.gov/>

Reassigned Numbers Database

The DNR is available at: <https://www.reassigned.us/>