



Do Not Call Procedure

Procedure approved by: Roumen Todorov

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Date of Approval: 7/8/2019

Departments: All phone departments

Start Date: July 8, 2019

End Date: further notice

Purpose and Scope:

It is the policy of 411 Locals to fully comply with all applicable "Do Not Call" laws and regulations regarding wired and wireless telephone communications (whether by live, artificial or prerecorded voice, telephone, facsimile machine, computer or otherwise) to any covered telephone line or number. In a good faith effort to comply and to provide consumers with an opportunity to exercise their "do not call" rights, 411 Locals establishes, and will implement the following procedures.

Procedures:

1. No representative of 411 Locals shall initiate any telephone solicitation/interaction, as defined by law, to any residential telephone subscriber before the hour of 8:00 am or after 9:00 pm (local time at the called party's location).
2. 411 Locals shall maintain a "company specific" do not call list and shall promptly honor a request to be placed on the company do not call list within a reasonable time of such request, not to exceed 10 days from the date of said request. Each entry on the *411 Locals do not call list* shall be retained for at least five (5) years or until the requester makes a further written request to be deleted from said list. The *411 Locals do not call list* shall readily be available in every company office as follows: IT Department will keep the *411 Locals do not call list*.
3. 411 Locals shall periodically purchase or otherwise obtain from the Do Not Call Administrator, not less frequently than every three months or such lesser time as may be prescribed by law, the applicable National Do Not Call database from the area in which 411 Locals makes telephone solicitations for the purpose of compliance with the "do not call" provisions of state and federal law. A copy of the National Do Not Call database shall be readily available in every company office: IT Department will keep the most updated National Do Not Call list.
4. Prior to making any telephone solicitation, 411 Locals IT Team shall check both the 411 Locals Do Not Call List and either the most recent applicable Do Not Call National database or the 411 Locals download of this database to ensure that no call is placed to a residential telephone subscriber listed therein unless:



- a. 411 Locals has the subscriber's prior express permission evidenced by a signed written agreement which states that the consumer agrees to the contact by 411 Locals and includes the telephone number to which the call may be placed.
 - b. The 411 Locals representative making the call has a personal relationship with the recipient of the call (a personal relationship means that the person called is personally known to the caller)
5. No representative of 411 Locals shall use any technology to dial a telephone number for the purpose of determining whether the line is a fax or voice line nor use an automatic telephone dialing system or artificial or prerecorded message in any call made to the wireless telephone number. The use by any representative of 411 Locals of any artificial or prerecorded messages delivered by an automatic telephone dialing system shall identify 411 Locals and 411 Locals number or address. No representative of 411 Locals shall use any system which blocks the transmission of caller ID information. All representatives of 411 Locals (whether employees or independent contractors) shall advise in writing of the fact that such a system is being used
6. In order to comply with all applicable do not call laws and the 411 locals license law duty to supervise affiliated licensees, each representative of 411 locals shall undergo periodic training as to the applicable law regarding telephone solicitations, including a review of the applicable rules regarding do not call restrictions, and shall be subject to discipline, up to and including termination, for any failure to participate in such training and any failure to comply with 411 Locals Do Not Call Policy and Procedures, as well as all applicable legal provisions.
7. In the event of any questions regarding the provisions of applicable law or this Do Not Call Policy and Procedure, the representative of 411 Locals shall promptly contact their direct manager or director to obtain clarification.
8. If a prospect, current or former client requests to be removed from our calling lists, the representative taking/making the call will:
 - a. Mark the call as "do not call" in vici (disposition Do Not Call). This step will remove the number from our callings lists and dialers BUT will allow manual dial, with the exception of Sales campaigns, which are designed to avoid manual dial/ If existing file in CRM (current or former client) - rep is to notate the account, including do not call pop up (this is our internal-customer DNC)
9. **In highly escalated cases** - client very irate, threatening to take some type of negative action against 411 Locals the rep taking/making the call:

Examples of caller's statements that should be escalated: "keep calling me, you will pay \$XXX for every call!" - "You will hear from my attorney" - "The FTC will hear about your calls" - "I've called the BBB and reported you" - "I reported you to the FTC (or any other government office, including police)" - "Tell Mr. (anybody in upper management) that they will hear from me soon"

 - a. Disposition the call in VICI as Do Not Call
 - B. **Sales:** Alert team lead or manager immediately so this incident can be escalated and addressed immediately.



C. Sales Team Lead / Manager will create escalation ticket if record in CRM - if no possibility to create an escalation ticket - send email to Manager (Heather Mills h.mills@us.411locals.com) including phone number and brief description of incident.

D. Escalations management team will review call and assess the risk, they will take proper actions to place on hard dnc, email or text the client, etc

I understand the Internal Do not Call Procedure. I understand that not following policies and procedures reflects as failure to follow instructions and will lead to corrective action

Agent name and Date

Manager's name and Date