

DLT and Messaging Compliance Policy for Quickport CRM

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1. Introduction

This DLT (Distributed Ledger Technology) and Messaging Compliance Policy ("Policy") outlines the requirements, responsibilities, and procedures for sending SMS and WhatsApp messages through the Quickport CRM platform in compliance with the Telecom Regulatory Authority of India (TRAI) regulations, specifically the **Telecom Commercial Communications Customer Preference Regulations (TCCCPR), 2018**.

This Policy applies to all users of Quickport CRM who utilize SMS, WhatsApp, or voice communication features within India. By using these services, you agree to comply with this Policy and all applicable Indian telecommunications laws.

2. What is DLT?

Distributed Ledger Technology (DLT) is a blockchain-based system mandated by TRAI to combat unsolicited commercial communications (spam), protect consumer preferences, and ensure transparency in SMS and voice messaging.^{[2][1]}

Under the TCCCPR 2018 regulations:

- All businesses sending commercial SMS or making promotional calls in India must register on a DLT platform
- Every message sender, template, header (Sender ID), and message content must be registered and approved before transmission
- DLT platforms maintain immutable records of all registrations, consents, and message deliveries
- Non-compliance can result in message blocking, penalties, and legal action.

Quickport CRM uses MSG91 as its DLT-compliant messaging provider to ensure all SMS and WhatsApp communications meet TRAI requirements.

3. Scope and Applicability

This Policy applies to:

3.1 Message Types Covered

- **SMS (Short Message Service):** Promotional, Transactional, Service-Implicit
- **WhatsApp Business API:** Transactional and Service-Implicit messages only (promotional not supported)
- **Voice Calls:** OTP verification calls and transactional voice messages (when available)

3.2 Users Subject to This Policy

- All Quickport CRM subscribers (Foundation, Engage, Automate, Intelligence, Innovation tiers)
- Businesses registered as Principal Entities (PEs) on DLT platforms
- Telemarketers and aggregators using Quickport CRM for client messaging
- Educational institutions, healthcare providers, service businesses, and call centers using the Service

3.3 Geographic Scope

This Policy applies to all messages sent to recipients with **Indian mobile numbers (+91 country code)**.

Messages to international recipients are subject to the destination country's regulations

4. User Responsibilities

4.1 DLT Registration

YOU (the Quickport CRM user) are responsible for:

1. **Registering as a Principal Entity (PE)** on a DLT platform operated by your telecom service provider (Jio, Airtel, Vodafone-Idea, BSNL, etc.).
2. **Obtaining your unique Principal Entity ID (PE ID)** and providing it to Quickport CRM during account setup.

3. **Registering Headers (Sender IDs)** with the DLT platform. Quickport CRM provides a default header "QCKPRT" for shared use, but you may register your own brand-specific header (e.g., "XYZBIZ").
4. **Registering Message Templates** for every type of communication you plan to send (OTP, appointment reminders, payment confirmations, promotional campaigns, etc.).
5. **Ensuring all templates are approved** by the DLT platform before attempting to send messages through Quickport CRM.

Note: Quickport CRM does not perform DLT registration on your behalf. We provide tools to help you manage approved templates and headers, but the legal responsibility for registration rests with you.

4.2 DLT Registration Costs

- **One-time registration fee:** ₹5,900 (approximately) for the first DLT platform registration
- **Additional platform registrations:** Free (if registering with multiple operators)
- **Annual renewal fees:** Vary by operator (typically ₹1,000-₹3,000)

These fees are paid directly to the DLT platform/telecom operator, not to Quickport CRM.

4.3 Template Management

You must:

- Use only **DLT-approved templates** when sending messages through Quickport CRM
- Include correct **template variables** in the exact order specified during registration (e.g., {#var#} placeholders)
- Update templates in Quickport CRM whenever you modify or add new templates on the DLT platform
- Maintain a minimum of **one approved template per message category** (OTP, transactional, promotional)^{[4][5][1][2]}

Quickport CRM Pre-Send Validation:

Our system automatically validates that:

- The Template ID you specify exists in our records
- The Header (Sender ID) matches an approved header
- The number of variables matches the template structure
- The message category is correct (Service-Implicit, Transactional, Promotional)

Messages that fail validation are blocked and not sent.

5. Message Categories

TRAI defines three message categories. Understanding these is critical for compliance

5.1 Service-Implicit Messages

Definition: Messages that are an inherent part of the service the customer has explicitly subscribed to.

Examples:

- OTP (One-Time Password) for login/verification
- Transaction confirmations (payment received, order placed)
- Appointment confirmations or reminders
- Delivery status updates
- Critical service alerts (system maintenance, security notifications)

Requirements:

- No promotional content allowed
- Must be directly related to the service the customer is using
- Consent is implicit (by using the service, the customer agrees to receive these messages)
- Can be sent to DND (Do Not Disturb) registered numbers

Quickport CRM Default Use: All OTP messages sent through Quickport CRM are categorized as Service-Implicit.

5.2 Transactional Messages

Definition: Messages providing information or updates about an existing transaction or relationship.

Examples:

- Invoice generation and payment reminders
- Class schedule changes (education)
- Prescription ready for pickup (healthcare)

- Support ticket status updates
- Booking confirmations

Requirements:

- Must relate to a specific transaction or ongoing service
- No promotional content (e.g., "50% off next purchase")
- Customer must have an existing relationship with your business
- Can be sent to DND-registered numbers if directly related to the transaction

5.3 Promotional Messages

Definition: Messages intended to promote products, services, or offers.

Examples:

- Discount offers and seasonal sales
- New product launches
- Event invitations (webinars, workshops)
- Newsletter subscriptions
- Referral program promotions

Requirements:

- **Explicit opt-in consent** required from the recipient
- **Cannot be sent to DND-registered numbers** unless the recipient has specifically opted in to receive promotional messages from your category
- Must include an opt-out mechanism (e.g., "Reply STOP to unsubscribe")
- Subject to time-of-day restrictions (typically 9 AM - 9 PM)

Quickport CRM Recommendation: Use promotional messages sparingly and only with verified consent to avoid high rejection rates.

6. Headers (Sender IDs)

6.1 What is a Header?

A **Header** (also called Sender ID) is the alphanumeric identifier that appears as the sender of your SMS (e.g., "QCKPRT," "ABCBNK," "XYZBIZ"). Headers must be registered with the DLT platform and approved before use.^{[1][2][3]}

6.2 Quickport Default Header

Quickport CRM provides a shared header "**QCKPRT**" for all users. This header is pre-registered and approved for:

- Service-Implicit messages (OTP, transactional alerts)
- Transactional messages (appointment reminders, payment confirmations)

Limitations of Shared Header:

- Generic branding (does not display your business name)
- May reduce recipient trust and click-through rates
- Not suitable for promotional campaigns

6.3 Custom Headers

You may register your own custom header (6 characters, alphanumeric, brand-specific) through the DLT platform. Benefits include:

- **Brand recognition:** Recipients see your business name
- **Higher trust:** Reduces likelihood of messages being marked as spam
- **Professional appearance:** Enhances customer experience

How to Use Custom Headers in Quickport CRM:

1. Register your header on the DLT platform
2. Obtain approval (typically 1-3 business days)
3. Contact Quickport CRM support (crm@quickport.co.in) to add your custom header to your account
4. Select your custom header when creating campaigns

6.4 Header Restrictions

TRAI prohibits:

- Generic headers (e.g., "INFO," "ALERT," "UPDATE")
- Headers impersonating government entities or telecom operators
- Headers that mislead recipients about the message sender
- Using unregistered or unapproved headers

Violation Consequence: Messages sent with non-compliant headers will be automatically blocked by telecom operators.

7. Template Structure and Variables

7.1 Template Format

DLT templates must include:

- **Static text:** The fixed message content
- **Dynamic variables:** Placeholders for personalized information (e.g., {#var#})

Example Template:

Your OTP is {#var#} for Quickport CRM login. Valid for 5 minutes. Do not share with anyone. - QCKPRT

Variables: {#var#} = OTP code (e.g., 123456)

7.2 Variable Rules

- Variables must be enclosed in {#var#} format
- Variables must appear in the **exact order** specified during template registration
- The number of variables in the message must match the template
- Variable content must not contain promotional text if the template is categorized as Service-Implicit or Transactional

Quickport CRM Validation:

Before sending, Quickport CRM checks that:

- The correct number of variables is provided
- Variable order matches the registered template

- Variable content does not violate category restrictions

7.3 Template Categories

Each template must be assigned to one of the three message categories (Service-Implicit, Transactional, Promotional) during DLT registration. **You cannot change the category after approval** without re-registering the template.

8. Consent and Opt-Out Management

8.1 Consent Requirements

For **Transactional and Service-Implicit** messages:

- Consent is **implied** by the customer's use of your service (e.g., signing up, making a purchase, scheduling an appointment)
- No separate opt-in required

For **Promotional** messages:

- **Explicit opt-in consent** is mandatory
- Consent must be obtained through:
 - Checkbox on registration forms (unchecked by default)
 - SMS opt-in (customer replies "YES" to a consent request)
 - Website consent forms with clear language
- Consent must be **category-specific** (e.g., "I agree to receive promotional offers from XYZ Business")
- Consent records must be maintained for **at least 12 months** for audit purposes

Quickport CRM Consent Management:

- Store consent timestamps and method (web form, SMS, email) in customer profiles
- Provide consent withdrawal options in-app and via SMS reply (e.g., "Reply STOP to unsubscribe")
- Automatically suppress promotional messages to customers who have opted out

8.2 Opt-Out Mechanism

All promotional messages must include:

- Clear opt-out instructions (e.g., "Reply STOP to unsubscribe" or "SMS STOP to 1234567890")
- Immediate opt-out processing (within 24 hours)
- Confirmation message upon successful opt-out

Quickport CRM handles opt-outs automatically:

- Customers who reply "STOP" are added to the suppression list
- Future promotional campaigns exclude suppressed customers
- Transactional and Service-Implicit messages continue unless the customer closes their account

9. Call-to-Action (CTA) Whitelisting

9.1 What is CTA Whitelisting?

If your message template includes:

- **URLs** (links to websites, landing pages, forms)
- **Phone numbers** (customer support, callback numbers)

These CTAs (Call-to-Actions) must be **whitelisted** on the DLT platform before the message can be sent.

9.2 Whitelisting Process

1. Log in to your DLT platform
2. Navigate to the CTA Whitelisting section
3. Submit URLs and phone numbers for approval
4. Wait for approval (typically 1-2 business days)
5. Link approved CTAs to your message templates

Quickport CRM Pre-Send Check:

Our system verifies that any URLs or phone numbers in your message variables are whitelisted. **Messages with non-whitelisted CTAs are blocked.**

9.3 CTA Restrictions

- Only URLs owned or controlled by your registered business entity are allowed
- Short URLs (bit.ly, tinyurl.com, etc.) are generally prohibited unless explicitly approved
- Dynamic URLs with tracking parameters may require additional approval

10. DND (Do Not Disturb) Regulations

10.1 What is DND?

DND (Do Not Disturb) is a service that allows mobile subscribers to block promotional messages and calls by registering with their telecom operator.

10.2 DND Rules

- **Service-Implicit and Transactional messages CAN be sent to DND-registered numbers** (e.g., OTPs, appointment reminders, order confirmations)
- **Promotional messages CANNOT be sent to DND-registered numbers** unless:
 - The recipient has explicitly opted in to receive promotional messages from your category
 - You maintain documented proof of consent

Quickport CRM DND Handling:

- MSG91 automatically checks recipient numbers against the DND registry in real-time
- Promotional messages to DND numbers are blocked unless you provide proof of explicit consent
- Transactional and Service-Implicit messages are delivered regardless of DND status

11. Message Delivery and Reporting

11.1 Delivery Success Metrics

Quickport CRM tracks and reports:

- **Delivery Rate:** Percentage of messages successfully delivered to recipient devices
- **DLR (Delivery Receipt) Success:** $\geq 95\%$ target on approved DLT templates

- **Latency:** P50 \leq 30 seconds, P95 \leq 120 seconds for OTP delivery
- **Rejection Rate:** Percentage of messages blocked by telecom operators

11.2 Common Rejection Reasons

Messages may be rejected due to:

- **Invalid Template ID:** Template not registered or expired
- **Non-Approved Header:** Sender ID not registered with DLT
- **DND Violation:** Promotional message sent to DND-registered number without consent
- **CTA Not Whitelisted:** Message contains unapproved URLs or phone numbers
- **Variable Mismatch:** Incorrect number or order of variables
- **Category Mismatch:** Message content does not match registered category (e.g., promotional content in Service-Implicit template)

Quickport CRM Rejection Alerts:

You will receive email and in-app notifications if your messages experience high rejection rates (>10%). Our support team will help you identify and resolve the issue.

12. Audit Trails and Record Keeping

12.1 What Quickport CRM Logs

For every message sent, Quickport CRM maintains:

- **Template ID:** The DLT-registered template used
- **Header:** The Sender ID (e.g., QCKPRT)
- **Category:** Service-Implicit, Transactional, or Promotional
- **Recipient:** Mobile number (E.164 format, e.g., +919876543210)
- **Message Content:** Full message text with resolved variables
- **Timestamps:** Send time, delivery time, DLR receipt time
- **Request ID:** Unique identifier from MSG91 for each message
- **DLR Status:** Delivered, Failed, or Pending

- **Rejection Code:** If message was blocked, the reason code

12.2 Retention Period

- **Message logs:** Retained for **12 months** for compliance and dispute resolution
- **Audit trails:** Retained for **180 days minimum** to meet CERT-In requirements
- **Consent records:** Retained for **12 months** after consent withdrawal

12.3 Export and Audit Support

You may request audit reports at any time by:

- Downloading CSV exports from the Quickport CRM dashboard (Settings → Compliance → Audit Logs)
- Emailing crm@quickport.co.in with the subject line "Audit Report Request - [Account ID]"

Response Time: Audit reports are provided within **48 hours** for standard requests.

13. Penalties for Non-Compliance

13.1 TRAI Penalties

Under TCCCPR 2018, violations can result in:

- **Fines:** Up to ₹25 lakh (₹2.5 million) per violation
- **Service Suspension:** Telecom operators may block your messaging and calling services
- **Legal Action:** Criminal prosecution under the Indian Penal Code for repeat offenders

13.2 Quickport CRM Enforcement

If we detect policy violations (e.g., sending promotional messages without consent, using unapproved templates, exceeding rate limits), we may:

- **Warn:** First-time violations receive a warning and guidance to correct the issue
- **Suspend:** Repeat violations result in temporary suspension of messaging features
- **Terminate:** Severe or persistent violations result in account termination without refund

Refer to Section 9 of our Terms of Service for full suspension and termination procedures.

14. WhatsApp Business API Compliance

14.1 WhatsApp-Specific Rules

WhatsApp Business API (available via MSG91) has additional restrictions:

- **No promotional messages** are allowed (WhatsApp policy, separate from DLT)
- **Template approval required** from WhatsApp (in addition to DLT approval)
- **24-hour messaging window:** You may only send messages within 24 hours of the customer's last interaction (opt-in, reply, or purchase)
- **Shared number recipient caps:** Quickport WABA (WhatsApp Business Account) enforces a limit of **1,000 unique recipients per 24 hours** on shared numbers

14.2 WhatsApp Template Categories

WhatsApp templates are categorized as:

- **Utility:** Order updates, account notifications, payment reminders
- **Authentication:** OTP codes (2FA)
- **Marketing:** Not supported on Quickport CRM shared WABA

Approval Time: WhatsApp template approval typically takes 24-48 hours.

15. Throughput and Rate Limits

15.1 SMS Throughput

Quickport CRM supports:

- **Baseline:** 10 TPS (Transactions Per Second)
- **Burst:** 20 TPS for short durations (up to 5 minutes)
- **Batch Size:** 500-1,000 messages per batch with ~200ms inter-batch delay

If you exceed these limits:

- Messages are queued and sent at the maximum allowed rate
- Sustained high-volume sending may trigger rate limiting to prevent operator blocks

Enterprise Throughput: Contact crm@quickport.co.in for custom throughput arrangements (Intelligence and Innovation tiers).

15.2 WhatsApp Throughput

- **Shared WABA:** 1,000 unique recipients per 24 hours
- **Dedicated WABA** (Option B upgrade): Up to 100,000 recipients per day (subject to WhatsApp approval and quality ratings)

16. Escalation and Support

16.1 DLT Registration Assistance

While Quickport CRM does not perform DLT registration on your behalf, we provide:

- **Step-by-step guides** in our documentation (<https://quickport.co.in/docs/dlt-guide>)
- **Template examples** for common use cases (OTP, appointment reminders, payment confirmations)
- **Support consultations** via email (crm@quickport.co.in) or chat (paid tiers)

16.2 Rejection Troubleshooting

If your messages are being rejected:

1. Check your DLT dashboard to verify template and header approval status
2. Review Quickport CRM message logs (Dashboard → Messages → Audit Logs) for rejection codes
3. Contact support with rejection codes and template details for diagnosis
4. Our team will work with MSG91 to resolve operator-level issues

16.3 Compliance Questions

For questions about TRAI regulations, consent management, or best practices:

- **Email:** crm@quickport.co.in (subject: "DLT Compliance Question")
- **Response Time:** 24-48 hours

- **Escalation:** If unresolved, contact Grievance Officer Jidnyasa Gunjal at +91 9422228848

17. Best Practices

17.1 Template Design

- Keep templates concise (≤ 160 characters for single SMS)
- Use clear, professional language
- Include your brand name
- Avoid excessive use of special characters (may cause encoding issues)
- Test templates with sample variables before launching campaigns

17.2 Consent Collection

- Use double opt-in for promotional messages (initial opt-in + confirmation)
- Store consent timestamps and method for audit purposes
- Make opt-out as easy as opt-in (one-click unsubscribe links)
- Honor opt-out requests immediately (within 24 hours)

17.3 Timing

- Send promotional messages only between 9 AM and 9 PM IST
- Avoid sending transactional messages late at night unless time-sensitive (e.g., OTPs)
- Schedule campaigns to avoid high-traffic periods (noon, 6 PM) for better delivery rates

17.4 E.164 Number Formatting

- Always use E.164 format for Indian numbers: +919XXXXXXXXX (country code + 10-digit number)
- Quickport CRM automatically formats numbers, but verify input data to avoid routing errors

18. Future Updates

As TRAI and telecom operators update DLT regulations, Quickport CRM will:

- **Notify users** of regulatory changes via email and in-app announcements
- **Update validation rules** to enforce new requirements automatically
- **Provide migration guides** for template or header changes
- **Conduct compliance audits** to ensure user accounts remain compliant

19. Policy Updates

We may update this Policy to reflect changes in:

- TRAI regulations
- MSG91 or WhatsApp API requirements
- Quickport CRM features and capabilities

Notification Method:

- Email to registered users 30 days before material changes take effect
- In-app notifications upon login
- Updated "Last Updated" date at the top of this document

Your continued use of messaging services after updates constitutes acceptance of the revised Policy.

20. Contact Information

For DLT compliance questions, template assistance, or violation reports:

Quickport CRM Support

Email: crm@quickport.co.in

Grievance Officer: Jidnyasa Gunjal

Mobile: +91 9422228848

Website: <https://quickport.co.in>

UDYAM Registration: MH180408716

Support Hours: Monday - Friday, 9:00 AM - 6:00 PM IST

Response Time: 24-48 hours for compliance inquiries

21. Acknowledgment

By using Quickport CRM's SMS, WhatsApp, or voice communication features, you acknowledge that:

- You have read and understood this DLT and Messaging Compliance Policy
- You are responsible for DLT registration and template approval
- You will comply with TRAI regulations and Quickport CRM's pre-send validation requirements
- Violations may result in message blocking, account suspension, or termination

Failure to comply with this Policy may result in legal penalties under TRAI regulations and termination of your Quickport CRM account.

END OF DLT AND MESSAGING COMPLIANCE POLICY

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Prepared by: Quickport CRM Compliance Team

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References:

- TRAI TCCCPR 2018 Regulations
- MSG91 DLT Guidelines
- Meta Guidelines for WhatsApp messaging