



This document is intended to provide a framework for questions you should ask of any business sending you consumer information.<sup>1</sup>

## ONLINE MARKETING PRACTICES

- What domains does your company use to gather consumer information?
- Identify those owned by you vs. under contract with a third party.<sup>2</sup>
- Provide examples of the form of consumer consent.<sup>3</sup>
- What third-party consent validation do you obtain?<sup>4</sup>
- What third-party data augmentation do you use?<sup>5</sup>
- How can consumers unsubscribe from ongoing contact (e.g., calls, SMS)?
- How will consumer revocation be communicated to us?
- How will data source information be communicated to me?<sup>6</sup>
- Do you place scripts, cookies or pixels to enable remarketing/retargeting?
- How long do you store consumer data?

## CONTACT CENTER PRACTICES<sup>7</sup>

- Do you make outbound calls or respond to inbound calls?
- Do inbound calls include warm call transfers?
- Do you own or outsource your contact center?
- Do the agents work in the contact center or virtually?
- How is consumer consent obtained and stored?
- What is your policy regarding call recordings?
- What is your policy regarding voicemail messages?
- Does the contact center use 'soundboard technology' or leave pre-recorded voicemail messages?
- If a consumer revokes consent via phone, how will that be managed?
- If a consumer is transferred to me and then revokes consent, how can I communicate that to you?

## COMPANY INFORMATION

- Who owns your company?
- Please identify any non-US operations.
- How long has the company been doing business under its current name?
- Please identify any legal or regulatory actions against your company or its employees or affiliates concerning marketing or call-center practices.
- Do you use incentives (e.g., sweepstakes, prizes) to generate consumer inquiries?

<sup>1</sup> This is not a comprehensive list or meant to replace advice from a legal professional. In addition, related inquiries should be made of businesses you send consumer data to, including understanding their licensing status, regulatory history, and data use and transfer practices.

<sup>2</sup> Each step in the data path from consumer consent until that data is transferred to us should be clear.

<sup>3</sup> This should be for all domains used to provide us with consumer data. Specific instructions for obtaining consumer consent will follow; may vary by industry and product/service.

<sup>4</sup> For example, Jornaya's Guardian service.

<sup>5</sup> For example, credit bureaus, Neustar, Axion.

<sup>6</sup> Specific instructions on data privacy and security will follow.

<sup>7</sup> If applicable.

<sup>8</sup> Specific instructions for call monitoring and storage will follow.