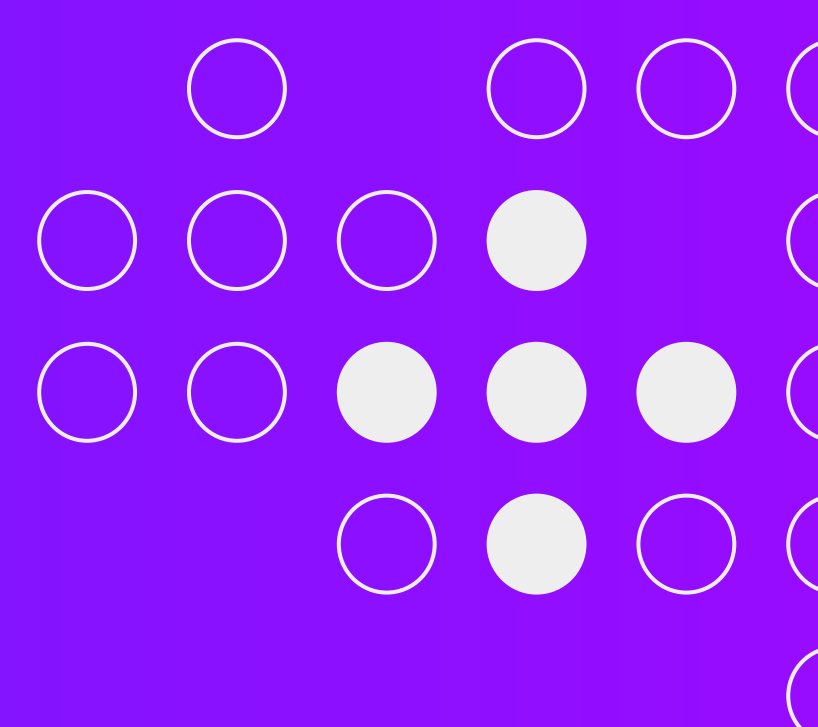
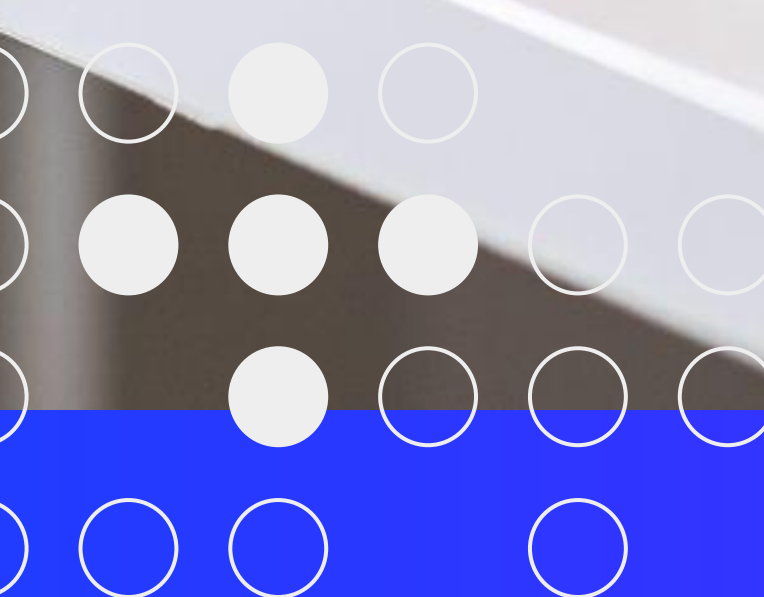




How the Verse Platform Maintains and Ensures Compliance



An in-depth look at how we help our customers with compliant, effective conversations



How the Verse platform works



We provide a **cloud-based platform** for companies to engage in text message **conversations with their customers** utilizing a combination of artificial intelligence (AI) and human concierges.

Our platform also permits outbound live calls and **email communications**. Verse's platform is designed to facilitate **meaningful two-way conversations** rather than high-volume one-way communications (such as marketing blasts).

ENSURING FULL COMPLIANCE:

How Verse helps our clients



As part of our commitment to compliance, we conduct “know your customer” due diligence with companies that use our platform.

We help your company to register their campaign for 10DLC messaging and obtain a trust score through the Campaign Registry (TCR). Our compliance team also reviews your opt-in and customer consent forms to ensure compliance.

We both require and enable all of our clients to comply with all federal, state, and local regulations and industry standards, including:

- ✓ The Telephone Consumer Protection Act (TCPA)
- ✓ The Federal Trade Commission's Telemarketing Sales Rule
- ✓ The CAN-SPAM Act
- ✓ Canada's Anti-Spam Legislation (CASL)
- ✓ The Cellular Telephone Industry Association (CTIA) Principles

What does Verse *actually* do for compliance?

We are your safety net, ensuring that your company is providing all required notices and obtaining necessary consents for all customer communications.

We constantly monitor text message opt-out rates for all of our clients in order to make sure that campaigns are both effective and compliant.

We perform a manual audit of client campaigns if the opt-out rate rises above 2% for two consecutive days.

- If the audit reveals the client is not obtaining consent, then Verse will suspend the client's campaigns until the client implements a consent mechanism.
- If the client is obtaining consent, but the client's opt-out rates remain above 2%, Verse works with the client to update their consent language.

At Verse, **our team of compliance experts** monitors and evaluates our methods, and our clients' methods, on a regular basis. We have voluntarily undergone several legal reviews of our processes to ensure that we are fully compliant.

For every client, we complete a **comprehensive compliance audit**, manage their **A2P Registration** and **TrustContact** process, and review messaging.



TCPA Compliance



Generally, the **TCPA** prohibits persons and entities from **calling or texting** consumers using an Automated Telephone Dialing System (ATDS), **unless the recipient has provided consent.**

Verse does not function like a typical ATDS, and we always gain recipient consent before contacting them.

We only store, call, and text numbers that our clients import via an API.

The TCPA defines ATDS as "equipment which has the capacity— (A) to store or produce telephone numbers to be called, using a random or sequential number generator; and (B) to dial such numbers."

This definition has caused significant disagreement and confusion regarding what actually qualifies as an ATDS.

Verse does not have a number generator; therefore, it cannot store or produce telephone numbers using a random or sequential number generator.

We also do not plan to make the Verse platform function like an ATDS (i.e., produce and store randomly-generated numbers).



We (and our legal team) would submit that **our platform is not an ATDS** as defined by the TCPA. However, because the definition is tricky, others may argue otherwise.

With that in mind, **we comply with the TCPA requirements for an ATDS just to be safe.**

Verse complies with the TCPA rules for ATDS in three main ways:



- 1** All leads that Verse receives have given express prior written consent that we may contact them on behalf of your company through their selected method of contact (e.g., phone call, text message or email). Verse then follows up using the lead's selected method of contact.
- 2** Before calling consumers, we first receive clear and express written consent (through text message, which qualifies).
- 3** We document customer consent and require our clients to do the same.

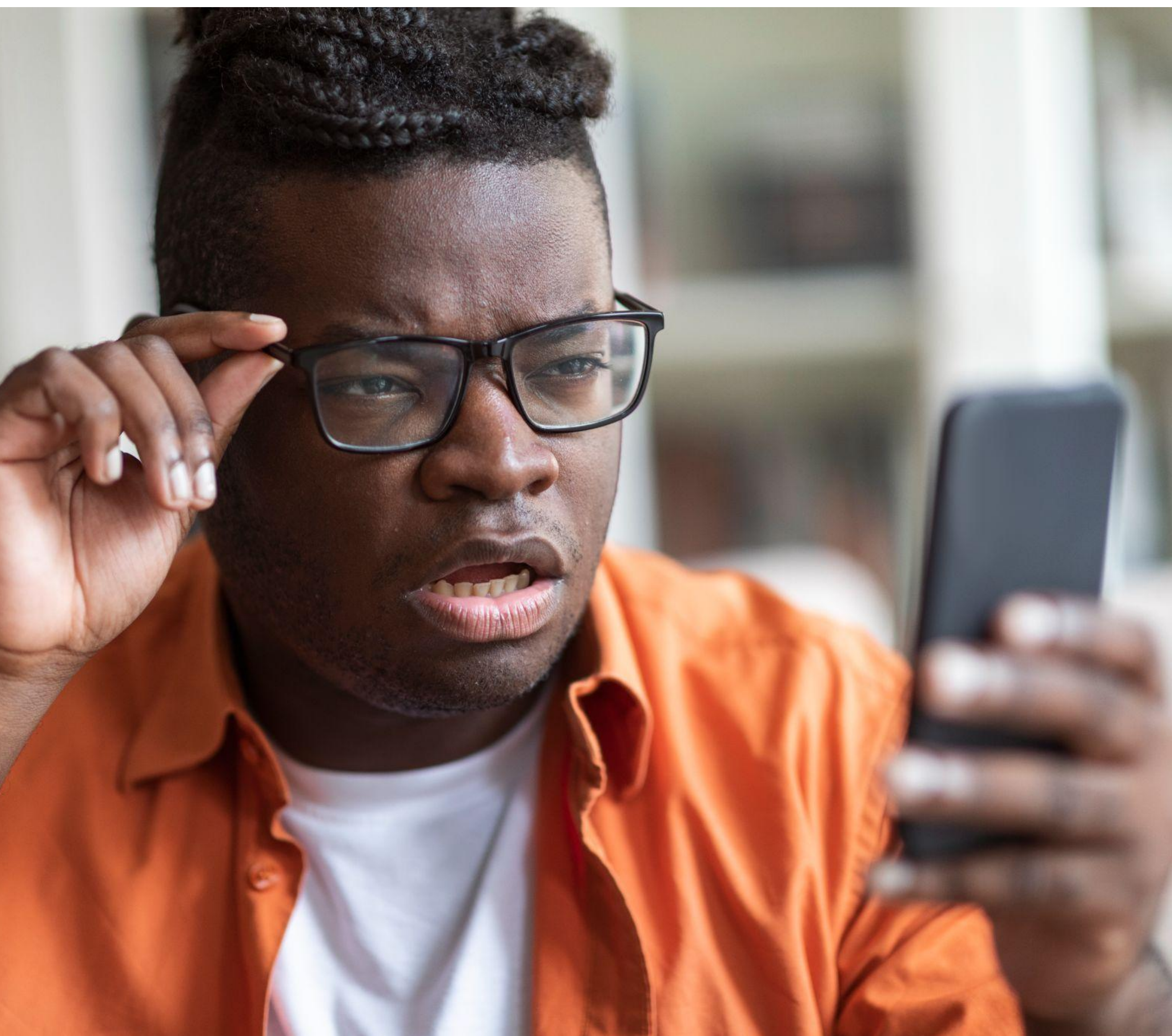
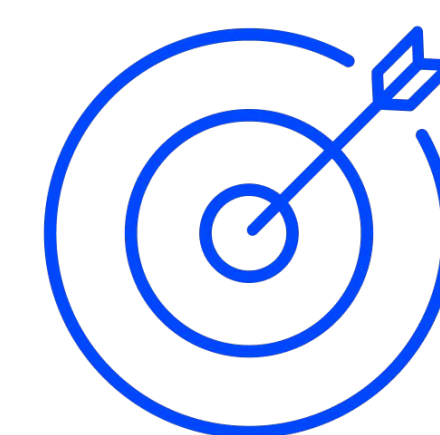


Additionally, we identify potentially problematic leads by **monitoring opt-out rates constantly** in order to **flag potential problems** for further review.

(We also have **strict rules for opt-outs**—more on that soon.)

To ensure compliance with the TCPA, our End User License Agreement also prohibits use of the Verse Solution “for unsolicited or unauthorized advertising, promotional materials, ‘junk mail’, ‘spam’, ‘chain letters’, ‘pyramid schemes’, or any other form of solicitation . . . in violation of any applicable laws.”

We take opt-outs seriously.



Processing, honoring, and maintaining record of opt-outs is a huge part of compliance with the **TCPA** and the **CAN-SPAM Act**.

We process all opt-outs immediately.

With Verse, there is a **substantial amount of human interaction** with leads in order to ensure they are properly **qualified or unqualified** as requested.

A lead can opt-out from Verse's communications in the following ways:

- **Text:** when a lead replies with opt-out keywords, the automation opts them out immediately. If our AI detects opt-out language, it's evaluated manually. If the lead is opting out, we disengage all automation and communication, unqualify the lead, put the lead on a blacklist, and archive it.
- **Email:** when a lead selects UNSUBSCRIBE after being sent an email, the lead is marked unsubscribed and all email communication is turned off on the back end. If the lead responds later using email, then the lead can be resubscribed.
- **Telephone:** when a lead requests to no longer be contacted when interacting with a concierge, the concierge indicates this immediately and the lead is opted out.

If a clients' opt-out rate reaches a threshold of 5% of total leads, a Verse employee will manually evaluate the account, the leads, and the client's procedures to identify any trends or concerns. Success managers may reach out to the client to provide feedback.

We do this to check for any potential issues, including potential consent issues, as well as promote our clients' success.

Compliance with CTIA Principles

The Cellular Telecommunications Industry Association (CTIA) sets forth a framework for reducing the risk of unwanted text message communications to consumers in an Application-to-Person (A2P) environment.

Verse complies and facilitates compliance with the CTIA Principles through our policies and procedures (this is an abbreviated list):

- Verse requires that its clients obtain consent from message recipients in accordance with the CTIA prior to texting recipients through Verse.
- Our compliance team will review the forms used by the client to obtain consent for communications made using Verse.
- Initial messages sent through Verse identify the client as the sender.
- Our platform recognizes all standard opt-out keywords (stop, stopall, unsubscribe, cancel, end, and quit).
- The first text message sent to the consumers always includes, “Reply STOP to unsubscribe.”
- We use AI to identify uncommon opt-out instructions like “please don’t text me anymore.”
- We send one opt-out confirmation message promptly upon receiving the opt-out request.
- If our client receives an opt-out request outside of Verse (such as email, phone call, or mail), the client can provide that request to Verse so we process the opt-out as well.
- Verse maintains an opt-out list for each client, as well as a global opt-out list, and we leverage our providers to maintain the same global opt-out list as a backup.



CTIA Principles: An In-Depth Look

A more comprehensive list of how Verse complies with relevant CTIA Principles.

Consumer Consent and Consumer Opt-In	<p>Verse requires that its clients obtain consent from message recipients in accordance with the CTIA prior to texting recipients through Verse.</p> <p>Our Success Managers will review the forms used by the client to obtain consent for communications made using Verse.</p>
Clear and Conspicuous Calls-to-Action	<p>If we identify excessive opt-out rates for a particular client, we work with the client to verify the relevant call-to-action and consent mechanism. We may assist clients in improving the call-to-action and/or consent mechanism and/or implementing a double opt-in.</p>
Confirm Opt-In for Recurring Messages	<p>Verse's platform is not designed for traditional recurring message campaigns in which the consumer only receives one-way communications. Verse instead facilitates a two-way conversation between consumers and AI or concierge, after an initial confirmatory message to the consumer.</p>
Consumer Opt-Out	<p>Our platform recognizes all standard opt-out keywords (stop, stopall, unsubscribe, cancel, end, and quit). The first text message sent to the consumers always includes "Reply STOP to unsubscribe." Our AI also identifies uncommon opt-out instructions like "please don't text me anymore."</p> <p>We send one opt-out confirmation message promptly upon receiving the opt-out request and honor opt-outs immediately.</p>

<p>Maintain and Update Consumer Information</p>	<p>Verse maintains an opt-out list for each client, as well as a global opt-out list, and we leverage our providers to maintain the same list as a backup. We process opt-out requests in near real-time.</p>
<p>Implement Reasonable Security Controls to Protect and Secure Consumer Information</p>	<p>Verse has implemented reasonable physical, administrative, and technical safeguards appropriate for the types and volumes of information it processes on behalf of clients.</p> <p>Verse clients are required to implement similar safeguards as part of their contract with Verse.</p>
<p>Conduct Regular Security Audits</p>	<p>Verse conducts internal security risk assessments on a regular basis and at least annually, and adjusts its safeguards program as necessary to reasonably mitigate identified vulnerabilities.</p> <p>Verse clients are required to undergo similar risk assessments and safeguard program adjustments as part of their contract with Verse.</p>
<p>Prevention of Unlawful Activities or Deceptive, Fraudulent, Unwanted, or Illicit</p>	<p>Verse specifically prohibits content related to common high risk categories including: cannabis, prescription medications, hate speech or harassment, abusive, or exploitative language, communications that originate from any hate group, fraudulent messages, malicious content such as malware and viruses, high-risk financial services such as payday loans, cryptocurrency, and short-term high interest rate loans, debt collection or debt relief, gambling, or “SHAFT” use cases (sex, hate, alcohol, firearms, tobacco).</p>

Embedded Website Links and Embedded Phone Numbers	Because embedding website links in messages that conceal or obscure the client's identity is prohibited by law, and embedding phone numbers in messages that are assigned to or forward to unpublished phone numbers is prohibited by law, Verse prohibits its clients from engaging in such conduct (through their contract with Verse).
Text-Enabling a Telephone Number for Non-Consumer (A2P) Messaging	Verse manages assignment of telephone number(s) for each client's messaging campaigns using its platform. Therefore, Verse confirms the client's authority to use the number(s) assigned to them. Verse also registers the campaign on the client's behalf via the Campaign Registry for 10DLC messaging.
Shared Numbers and Short Codes	Verse clients do not share telephone numbers. All campaigns using the Platform operate via 10DLC numbers, not short codes.
Snowshoe Messaging	Verse does not permit snowshoe messaging.
Grey Routes	Verse does not permit grey routes.
Proxy Numbers	Verse's platform does not support proxy numbers.
Text-Enabled Toll-Free Telephone Numbers	All campaigns using the Platform operate via 10DLC numbers, not toll-free numbers.

Note: This is not a fully inclusive list of every way Verse complies with CTIA Principles; it has been condensed for brevity and readability.

For any questions or concerns, please contact us at info@verse.ai.

Full Compliance

Starts and Ends with

At Verse, we not only ensure the communications made on our clients' behalf are always fully compliant, but **we guide you through the process.**

Our experts also help every client with their brand's compliance, including **required language, opt-ins and opt-outs, and A2P registration.**

The end result is a platform that combines the power of AI with human empathy to provide customers with excellent conversations that **they want to have.**

With Verse, communicate with your clients on their terms, **fully in line with the TCPA and all other federal, state, and carrier regulations.**

Scan the QR code below to learn more about Verse's fully-managed, compliant platform.

Scan or click to learn how Verse.ai's compliant texting works

