TelNet SMS Acceptable Use Policy

The following policies apply to our SMS/ MMS solutions, whether sent via the Webex Application, a TelNet provided portal, a third party provider, or via API.

Additional policies, regulations, and laws may exist beyond those listed below. The following is not legal advice. It is strongly recommended you consult your own legal advisor for help understanding legal obligations you may have, given the kind of messaging you wish to send.

Use of TelNet SMS must comply with TelNet's **Terms of Service**.

TelNet SMS guidelines

- Send no more than 60 messages per originating number per minute
- TelNet SMS is not intended to be used for marketing, promotional, or blast campaign messaging.
- Do not use purchased lists or third party generated lead lists when sending SMS
- Avoid using link shorteners and non-branded domains for embedded links

If you need to send more than 60 messages per originating number per minute, please contact your sales representative to discuss options.

Opt-in/ user consent

Before sending an SMS message to any number you must have their express consent to do so. It's important to note that implied consent is not considered sufficient for SMS outside of immediately responding to a received message, nor is purchasing a list of "users who have opted in to SMS." A user must actively ask to receive SMS messages from you. Examples of obtaining consent include using a web form where it is clearly explained that a user is opting into SMS messages, or by having them send a message to your number. Failure to ensure opt-in may result in your number or service being blocked or suspended by mobile carriers or TelNet.

An appropriate consent should include the following:

Transparent notice

Notice to users should make clear how their data (whether identifiable or pseudonymous data) is used and/or processed through the entire data lifecycle. For example, to send a business-to-consumer message, the user should be informed that you intend to use their phone number to send them me¬¬¬ssages about a specific product, service, or topic in addition to obtaining consent in accordance with the requirements below.

Consent requirements

Acceptable consent should comply with the following parameters:

Informed. To obtain informed consent, notice should be transparent, as described above.

Layered. Where necessary, you should take a layered approach to your consent, placing key information in the first layer, with supplemental information in the second layer.

- The first layer should include information that has the most impact on the user and notice about any processing that may surprise the user (such as the identity of the data controller(s), the purpose(s) of the proposed data processing, the type(s) of data collected / used, and the mechanism to withdraw consent).
- The second layer should be easily accessible (e.g., "learn more about..." link) and provides supplemental information that would be useful to the user.

Framed as a free choice:

Acceptable consent should comply with the following parameters:

- Consent options should be presented equally.
- Core aspects of a product should not be blocked if a user does not agree. Declining should not have a significant negative consequence.
- It should be clear to users that consent is optional.

Unambiguous and specific:

- Use simple, concrete language.
- Obtain clear, affirmative indication of consent form the user (e.g., "I agree" or "I consent", "Decline" or "Refuse").
- Request consent for specific purpose(s) and clearly separate requests for consent from information about other things.

Revocable: Include a specific destination that allows users to withdraw their consent at any time.

- Give users a simple means to revoke consent. This means making revocation easily accessible and possible for the user to revoke their consent via the relevant Communication Product (e.g., replying "STOP" to a SMS or RBM message).

Recorded: Each instance of consent (and consent withdrawal) record should be centralized and auditable.

Regional variation: Certain jurisdictions may include variations or additional requirements to notice and consent. It is your responsibility to ensure that your notice and consent practices comply with all applicable laws.

Opt-Out

TelNet will automatically send an opt-out notification at the beginning of a conversation and at an interval of every 10 outbound text messages. This message will be in the footer of the outbound text message and will tell the intended recipient how to opt-out of future messages.

When a message recipient opts-out of messaging, TelNet will automatically blacklist that telephone number from use. This will be done at the campaign level, meaning the recipient that opted out will not be able to receive any messages from telephone numbers within the same campaign.

Prohibited Content

The following message content is also strictly prohibited and may result in your service being blocked or suspended by the carriers or TelNet:

- The following types of content are not allowed on 10DLC: Sex, Hate, Alcohol, Firearms, Tobacco (cannabis, CBD, etc.) - SHAFT-C
- Messages that engage in any illegal activity or facilitate the purchases or sales of any illegal products and services or otherwise violate our terms of service, including the acceptable use policy
    Examples include, but are not limited to: child sexual abuse imagery, sales of human organs, sales of animal and regulated species, and human trafficking activities. It is your responsibility to comply with the applicable laws and regulations in your respective country.

- Using the services to engage in any activities that exploits, harms, or threatens to harm children or any other protected class of people
- Messages that engage in or promote, pornographic or adult entertainment, regardless of legality
- Messages that contain text or references to violence, hate speech, or otherwise engaging in threatening, abusive, harassing, defamatory, libelous, deceptive or fraudulent behavior
- Messages that contain text or otherwise reference substances defined as controlled substances under federal law, regardless of legality, including marijuana (cannabis)
- Messages that contain third-party affiliate/lead generation links
- Messages that contain obfuscated links for the purpose of misleading the reader, or use links contrary to the expectation of the user based on the message text
- Messages that are structured to evade this policy or the policies of carriers (e.g. misspelling, uncommon capitalization, etc.)

TelNet Worldwide reserves the right to add to this list at any time or determine messages are prohibited at its discretion.

Abuse of the product

Do not misuse our Communication Services. We want our Communication Services to be useful, relevant, and safe for users, so we do not allow the following:

- Phishing scams
- Attempting to trick other users or third parties for unfair advantages or financial gain
- Content or behavior that circumvents, harms, or interferes with the operation of other agents, our Communication Services networks, servers, or other infrastructure
- Distribution of malicious or unwanted software

Misrepresentation and Impersonation

Users should not feel misled by our services. You should be upfront, honest, and provide them with the information that they need to make informed decisions. Your use of our services must represent you and your products or services in a way that is accurate, realistic, and truthful. You may not use our services to mislead or confuse users by pretending to be someone else or pretending to represent an organization you do not represent.

Message content must not:

- Be misleading (e.g., making false statement about the business or qualification, falsely affiliating with other individuals, organizations, products and services, or making false claims which position improbable results are likely outcomes even if there are technically feasible)
- Conceal or misstate information about the business, product, or service (e.g., using a false identity, business name or contact information, offers for products or services that are normally offered for free or falsely affiliating with a political organization)
- Contain information which is not clearly relevant to the actual product or service on the destination page
- Fail to disclose the payment model and full expense that a user will bear (e.g., shipping costs and other billing related information; recurring subscription costs)

- Prompt users to initiate a purchase, download, or other commitment without first providing all relevant information and obtaining the user's explicit consent
- Feature content that are provably false and could significantly undermine participation or trust in civic, electoral or democratic processes such as census participation or public voting procedures

Spam

Don't spam users. Examples of spam include unsolicited promotional or commercial content, unwanted, repetitive, or nonsensical content, or any content or agent behavior that results in user spam reporting. Please keep in mind that a user's definition of spam may differ from yours, so please exercise judgment when sending messages to one or multiple users, even if they've elected to receive messages from you in the past. To ensure that you do not spam or facilitate transmission of spam, please follow the guidelines below:

- Ensure that you only communicate with users who have explicitly opted into receiving your messages.
- Do not send unsolicited content or aggressively message users.
- Do not sell, purchase, exchange, or distribute user phone numbers to a third party without the user's consent.
- Abide by any applicable local regulations, such as specific opt-in requirements before messaging mobile subscribers, record keeping, and opt-out requirements.

Carrier fees and account restrictions

Accounts in violation of TelNet Worldwide or carrier rules and regulations may be subject to reduced deliverability of messages, additional campaign registration requirements and fees, suspension of service, or termination of service in addition to fines and other penalties passed through TelNet Worldwide by the carriers.

It is your responsibility to be aware of any additional restrictions when sending SMS messages, and to adhere to any and all policies related to the recipient number.