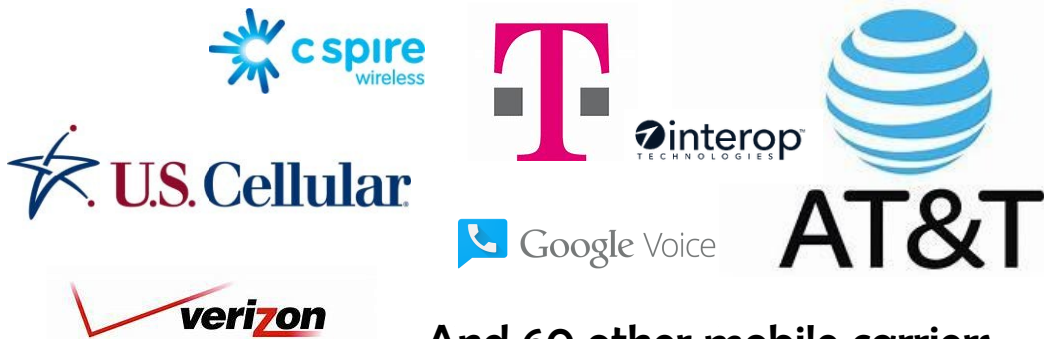


PizzaCloud



Current requirements for 10DLC brand and campaign registration



And 60 other mobile carriers

As the TCR (The national Campaign Registry) and DCAs (The four organizations that handle the actual brand and campaign approvals) have worked through the launch of the new text messaging rules...it has been a real moving target.

Each month we have seen a gradual tightening of the application of the compliance rules and some actual changes to the rules themselves.

These changes mostly center on three areas:

Specific wording in the privacy policy.

Specific wording in terms and conditions.

Specific wording in the "call to action" where customers opt-in for marketing messages. This can be verbal, online, IVR ("press one to receive coupons and offers"), by keyword (text "OFFERS" to xxx-xxx-xxxx to receive a free puppy).

Due to this creeping strictness on compliance, we are seeing brands rejected today that would have been approved a month or two ago.

This document is intended to provide guidance on what needs to exist on the "brand" web site and online ordering.

One complexity is where YOU control your public web site, but the opt-in is part of the online ordering, which is part of the POS system or a third party loyalty program, and that may or may not link to YOUR privacy policy and T&C.

Why is this so complicated?

In short...because this entire new platform and rules are not designed for restaurants, but for "everyone". So the rules meant more for the guy promoting extended car warranties also apply to you.

What services does PizzaCloud offer for messaging?

- Text enabled PBX/phone system.
“Press one to receive a text message with links to online ordering” or
“Press one to receive offers and coupons by text message”
- Enable your POS system to send order status/delivery notifications or login pins from the store phone number.
We have an API that the POS system can hit to send messages, using your existing store phone number.
- Enable POS or loyalty/rewards system to send marketing messages from the store phone number. So, if your loyalty system can do text message marketing, it can send through us.
- We have a complete portal where you can manage number lists, text or image messages and marketing campaigns.
If your loyalty system does not do text messages (or you are otherwise not satisfied with features), you can use our platform.

All the above are available on an individual store basic AND from “parent” accounts. So at corporate level or for a multi-unit operator, you have ability to manage all the above for all stores.

In order for any of the above to be enabled, we need to get a campaign registered for you. This can be at individual owner level or at corporate. Individual owners can be paying for their usage, even if brand registered at corporate level.

The key point is that there is required language for the privacy policy and T&C of the public web site, and for any online “opt-in” screen, even if that is part of the POS system. We will review this with you and let you know specifics. Details on next few pages.

Privacy Policy on public web site:

Wording of the rule: Message Senders are responsible for protecting the privacy of consumers information and must comply with applicable privacy laws. The main requirement for privacy policies is that the Message Sender does not have information alluding to or stating they sell/rent/share end-user data. If they do have information in the privacy policy about sharing end-user data, they must have a section that states “all information collected as part of SMS opt in will not be sold/rented/shared”

Message Senders should maintain a privacy policy for all programs and make it accessible from the initial CTA. **There must be a clear path from home page to privacy policy. It cannot be deeply buried on the web site.** We have seen rejections simply because the agent doing the review “could not locate privacy policy”. If they have to search for it, expect a rejection.

Best practice is to clearly state that “{brand} does not sell/rent or share customer phone numbers or opt-in information with third parties”. Note that this does NOT mean you cannot use a third-party loyalty or POS system, but refers to you sharing data with others for their marketing purposes.

If you do not have a privacy policy on your public web site, there is little chance of getting approval.

Terms and Conditions (Of Terms-of-Use) on Opt-in/Call-to-Action (CTA) screen.

This might be a checkbox for “send me promotions” as part of online ordering, or a more direct “join our loyalty program” screen.

Comprehensive terms and conditions might be presented in full beneath the CTA, or they might be accessible from a link in proximity to the CTA and must disclose the following:

Program (Brand) Name

Product Description

Message Frequency Disclosure

Message and Data Rates May apply (if non-FTEU)

Customer Care Contact Information (email or phone number)

Opt-Out Instructions (reply STOP to opt-out)

Example for “Super Pizza” might be:

Super Pizza will send you offers and promotions. Standard message and data rates apply. Msg frequency varies. You may reach us at {could be email, and/or store phone number}. Reply STOP to any message to cancel.

The above must be EITHER clearly visible on the screen where the customer opts-in, OR in the T&C which MUST be linked from that screen.

PizzaCloud is working with all the POS vendors to get the appropriate language added to their standard screens.

Other methods of customers opting in:

Verbal opt-in:

If when speaking to staff customers are given opportunity to join loyalty program (with whatever wording you use), there are similar requirements as if online. You are supposed to mention:

Program (Brand) Name

Product Description

Message Frequency Disclosure

Message and Data Rates May apply (if non-FTEU)

Customer Care Contact Information (email or phone number)

Opt-Out Instructions (reply STOP to opt-out)

Example for "Super Pizza" might be:

Super Pizza will send you offers and promotions. Standard message and data rates apply. Msg frequency varies. You may reach us at {could be email, and/or store phone number}. Reply STOP to any message to cancel.

Instead of staff actually saying those words, an initial opt-in confirmation message can be sent. i.e. that exact wording above can be sent as a message. They do not need to reply "y" to confirm. It is a "soft opt-in" so they are informed and can reply "STOP" to cancel.

Keyword opt-in:

We can enable various key words to allow customers to opt-in by texting the store number. i.e. "Text Offers to xxx-xxx-xxxx to receive offers and coupons".

This will generate an opt-in confirmation message

Thank you for joining the Super Pizza loyalty system. Here is a coupon for xxx. Standard message and data rates apply. Msg frequency varies. You may reach us at {could be email, and/or store phone number}. Reply STOP to any message to cancel.

IVR opt-in:

When a customer calls the store, the greeting can include options such as "To receive offers and coupons press one".

This will generate an opt-in confirmation message

Thank you for joining the Super Pizza loyalty system. Here is a coupon for xxx. Standard message and data rates apply. Msg frequency varies. You may reach us at {could be email, and/or store phone number}. Reply STOP to any message to cancel.

HELP and STOP handling:

Our system can automatically respond to HELP messages with a static response such as "We do not read messages on this number, but you can call us during normal store hours".

Our system can either relay STOP messages to the POS/Loyalty system or handle them directly. We will send the stop confirmation, such as "Your number has been removed from the loyalty system and you will receive no further marketing messages. Reply RESUME to re join the program" or similar.

We will then block any future marketing messages sent to that user.