

# Columbia CU Do Not Call Policy

Columbia Credit Union follows federal and state laws and regulations applicable to outbound telephone calls to protect the privacy of consumers.



## Procedures

Columbia Credit Union requires employees directly involved in placement of outbound telephone solicitations to review and follow the Do Not Call Policy.

## Purpose

The federal government, through the Federal Communications Commission ("FCC") and the Federal Trade Commission ("FTC"), and several states have enacted laws governing how companies contact consumers through use of the telephone. These laws generally cover the following areas: (a) Do Not Call lists; (b) Do Not Call List exceptions; (c) Company-Specific Do Not Call lists; (d) Use of Automated or Predictive Dialers; (e) Use of Artificial or Prerecorded Voices; (f) Abandoned Calls; (g) Wireless Telephone Numbers; (h) Caller ID Requirements; (i) Time-of-Day Restrictions; (j) Sales and Upsell Disclosures; and (k) Facsimile Restrictions.

## Do Not Call Lists

"Do Not Call" lists allow consumers to exclude their numbers from telephone solicitations, except in certain limited circumstances. Columbia Credit Union will not make outbound telephone calls to non-members and therefore does not subscribe to any federal or state Do Not Call lists. If this changes, the Credit Union will follow all required processes to ensure phone lists are scrubbed against applicable state and federal Do Not Call lists, subject to applicable exceptions.

## Do Not Call List Exceptions

Most Do Not Call laws allow businesses and other entities to make telephone solicitations to certain consumers even if their number appears on a Do Not Call list. These exceptions generally apply to (1) businesses with an "Established Business Relationship" with the consumer; (2) a consumer who has specifically consented to allow the business to call him or her; (3) charitable organizations; and (4) political entities. Given our business, the established business relationship exception will apply most frequently. The Credit Union may contact previous members for up to 18 months after their last transaction.

## Company-Specific Do Not Call Lists

Do Not Call regulations allow consumers to place their telephone number on a Company-Specific Do Not Call list that prohibits a business from contacting them, even if there is an established business relationship. When a member requests to be placed in the Credit Union's Do Not Call database, it will become effective no later than 30 days after the request is made and recorded.

## Use of Automated or Predictive Dialers

These laws dictate when and how Columbia Credit Union can use automated or predictive dialers to call consumers. The Credit Union will not use automated or predictive dialers to place telephone solicitations. If this changes, the Credit Union will comply with FCC rules.

## Use of Artificial or Prerecorded Voices

These laws dictate how and when Columbia Credit Union can use artificial or prerecorded voice services to call consumers. The Credit Union will not use automated or prerecorded voices to place telephone solicitations. If this changes, the Credit Union will comply with FCC rules.

## **Abandoned Calls**

When using an automated or predictive dialer, Columbia Credit Union cannot disconnect an unanswered telephone solicitation call until either 15 seconds have elapsed after the first ring, or after four (4) rings. The FCC classifies a telephone solicitation that does not meet these requirements as an "abandoned call." Columbia Credit Union will not use automated or predictive dialers to place telephone solicitations. If this changes, the Credit Union will comply with FCC rules.

## **Wireless Telephone Numbers**

Columbia Credit Union will apply all FCC Do Not Call rules to wireless telephone numbers.

## **Caller ID Requirements**

Columbia Credit Union will not block Caller ID information. In accordance with FCC rules, the Credit Union will transmit Caller ID information and callers will be identified as "Columbia Credit Union."

## **Time of Day Restrictions**

Columbia Credit Union employees will not place telephone solicitation calls to residential telephone numbers before 8:00AM or after 9:00PM Monday through Saturday (local time at the residential telephone number location) or on Sunday from 9:00AM to 9:00PM. If calls are made to states with stricter time of day restrictions than FCC rules, the Credit Union will follow the stricter guidelines.

## **Identification of Telephone Solicitation**

Columbia Credit Union employees will make all telephone solicitation calls. If this changes, persons representing the Credit Union will clearly state they work for Columbia Credit Union, their name, the purpose of their call and will provide a telephone number to contact the Credit Union directly.

## **Sales and Upsell Disclosures**

For all outbound calls that include a sales or an upsell component, Columbia Credit Union must provide required telemarketing disclosures prior to the sales communication. This includes truthfully disclosing material information in a clear and conspicuous manner before a member pays for a good or service, and obtaining the member's express, verifiable authorization for payment.

## **Facsimile Restrictions**

Columbia Credit Union will not dial any telephone number to determine if the line is a facsimile or voice line. The Credit Union will not use facsimile machines, computers or any other device to send "unsolicited advertisements" to any telephone facsimile machine.

## **Handling Do-Not-Call Questions**

During a telephone call with a member, employees may encounter requests: (a) for information about Do Not Call legislation; (b) to be placed on the National Do Not Call Registry; (c) to be placed on a state Do Not Call list; (d) to be placed on our Company-Specific Do Not Call list; or (e) for a copy of Columbia Credit Union's Do Not Call Policy. Each of these requests will be handled as outlined below. If a request does not fall within any of these categories, the employee will contact his/her supervisor immediately.

## **Requests for Information about Do-Not-Call Legislation**

Unless instructed otherwise by Columbia Credit Union, employees will direct members to the FCC's telephone number at 888-225-5322 or to the FCC's website: <https://www.fcc.gov/>.

## **Requests to be placed on the National Do-Not-Call List**

Unless instructed otherwise by Columbia Credit Union, employees will direct members to the FCC's Do-Not-Call telephone number at 888-382-1222 or to the FCC's website: <https://www.donotcall.gov/>.

## **Requests to be placed on a State Do-Not-Call List**

Unless instructed otherwise by Columbia Credit Union, employees will direct members to the state government website for the state referenced.

**Requests to be placed on a Company-Specific Do-Not-Call List**

After the member's identity has been confirmed, employees will collect the member's name, address, contact telephone number(s) and account number. Employee training will include instruction on how to input this information into the Credit Union's Do Not Call Database.

**Requests for a Copy of This Do Not Call Policy**

If members ask for a copy of Columbia Credit Union's Do Not Call Policy and they have access to the Internet, they will be directed to the Credit Union's online Do Not Call Policy at [www.columbiacu.org](http://www.columbiacu.org) found in the footer of every page under "Disclosures." Staff can also mail members a copy if that is the member's preference.

**Written Policy**

This policy serves as Columbia Credit Union's written Do Not Call Policy as required by FCC Rules. The Credit Union may change, revise or alter this policy to reflect changes in federal or state law or as business needs require.