



Marketing Partner Guidelines

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ABOUT CAREINGTON

Since 1979, Careington International Corporation has been dedicated to improving the security and well-being of individuals and families with innovative products and services designed to meet the needs of our clients and their customers. Careington is a licensed DMPO and supports over 100 products and services including product management, pre- and post-sale customer service, technology solutions, e-commerce, fulfillment and marketing support.

Also, Careington has a sister company, Careington BenefitSolutions, that is a licensed TPA and insurance company. Our products are designed to meet the needs of insurance companies, affinity groups, employers, labor unions and other entities seeking to add value and security for their customers.



DMPO REGULATIONS & GUIDELINES

Any third party who is marketing on behalf of Careington or selling Careington's products is prohibited from marketing and/or selling Careington's products unless they have demonstrated full compliance with these Guidelines.

The Guidelines are intended to facilitate compliance with relevant federal and state laws and regulations including, but not limited to:

- Section 5 of the FTC Act
- Telephone Consumer Protection Act (TCPA)
- Telemarketing Sale Rule
- State telemarketing laws
- State laws governing Discount Medical Plan Organizations (DMPO)



DMPO REGULATIONS & GUIDELINES

The Guidelines also include best practices that may impose requirements that exceed those mandated by federal and/or state law.

Any Partner who violates applicable laws and/or these Guidelines, as determined by Careington, shall be subject to suspension or termination of the parties' underlying Agreement.



BASIC REQUIREMENTS

Partners who market Careington's products shall:

- Comply with all relevant laws and regulations.
- Conduct business solely using their own legal name and/or a registered fictitious (d/b/a) name that has been provided to Careington in writing.
- **Not** refer to Careington's discount medical plans as insurance or imply that such plans are insurance products.
- Obtain all required licenses and registrations to sell discount medical plans.



BASIC REQUIREMENTS

Partners who market Careington's products shall:

- Post a privacy policy on all websites disclosing what personally identifiable information (PII) the Partner collects, how it is used and under what circumstances it is shared with third parties.
 - The privacy policy shall meet the requirements set forth in California's Online Privacy Protection Act (Cal Bus & Prof Code § 22575 et seq.)
- Protect consumers' PII and maintain a written information security program (ISP) containing appropriate administrative, technical and physical safeguards.



BASIC REQUIREMENTS

Partners who market Careington's products shall:

- **Not** use high pressure sales tactics or engage in unfair or deceptive practices during sale presentations.
- Notify Careington within 7 days of any complaint, lawsuit, investigation or subpoena received.
 - Partner must provide a copy or a summary of the complaint (if received verbally), including:
 - Contact information for the person making the complaint
 - A description of the underlying issue(s)
 - What was done to resolve the issue(s)



BASIC REQUIREMENTS

Partners who market Careington's products shall:

- Allow Careington to perform a compliance audit on its marketing and sales practices.
 - *Partners shall provide reasonable access to their policies, procedures and business records upon reasonable notice.*



BASIC REQUIREMENTS

Partners who market Careington's products shall:

- **Not** utilize any marketing materials without written approval from Careington.
This includes, but is not limited to:
 - Mailers
 - Emails
 - Radio
 - Television ads
 - Online ads
- Resubmit marketing pieces to Careington for approval *if* any changes are made to previously approved pieces.
- **Not** use any deceptive or misleading marketing materials.



BASIC REQUIREMENTS

Partners who market Careington's products shall:

- Substantiate all claims made in an advertisement at the time they are made.
 - *Retain all information, documents or records necessary to substantiate such claims.*
- Include mandatory disclosures in all marketing materials.



BASIC REQUIREMENTS

Partners who market Careington's products shall:

- **Not** use the word "Free" or similar words in marketing materials unless all terms and conditions of the offer are clearly and conspicuously disclosed and the offer meets the requirements outlined in the Federal Trade Commission's "Guide Concerning Use of the Word 'Free' and Similar Representations" (16 C.F.R. § 251.1).



BASIC REQUIREMENTS

Partners who market Careington's products shall:

- Meet the principles set forth in the Federal Trade Commission's .Com Disclosures guidance document when using online or mobile advertising.
- Meet all requirements set forth under the CAN-SPAM Act (15 U.S.C. § 7701 et seq.; 16 C.F.R. § 316.1 et seq.) when using email advertisements, including, but not limited to:
 - Accurate header information
 - Accurate subject lines
 - Identification as an advertisement
 - Inclusion of physical address
 - A clear opt-out message allowing the recipient to opt-out of all commercial emails



TELEMARKETING REQUIREMENTS

Partners who conduct inbound or outbound telemarketing, including those with both a customer service and marketing component, shall:

- Only make outbound telemarketing calls to a consumer who **IS NOT** on the National Do Not Call (DNC) Registry or state DNC list **OR** who falls under an exemption.*
- Retain and produce, upon request, substantiation of each exemption relied upon to make an outbound call.

Some possible exemptions are:

- Consumer gave “express written consent” for solicitation calls (consumer’s telephone number and signature on an agreement with a clearly and conspicuously disclosed purpose).
- Partner has an “established business relationship” (EBR) with the consumer.

**Not all states recognize exemptions equally, so Partners must seek legal counsel to analyze each state’s laws and exemptions prior to beginning a marketing campaign in a state.*



TELEMARKETING REQUIREMENTS

Partners who conduct inbound or outbound telemarketing, including those with both a customer service and marketing component, shall:

- Implement policies, procedures, and training to honor company specific DNC requests made by consumers during campaigns.
 - *DNC Requests Made to Vendors:* Partner's internal DNC list shall include the number for each consumer who made a DNC request during campaigns conducted by approved third parties (if any).
 - An internal DNC request shall be processed and honored (no calls to the number in question) no later than 7 calendar days from the date of the request. Numbers remain on each Partner's internal DNC list permanently.
 - *Sharing DNC Requests with Careington:* Marketing partners are not permitted to conduct telemarketing campaigns as a vendor of Careington.
 - Partner may not use Careington's name during any telemarketing campaigns without written approval.
 - All internal DNC requests received during Partner's own telemarketing campaign will be made available to Careington upon request.
 - An internal DNC request from a consumer negates any state or federal exemption that might otherwise allow the Partner to call the consumer.



TELEMARKETING REQUIREMENTS

Partners who conduct inbound or outbound telemarketing, including those with both a customer service and marketing component, shall:

- Adopt and implement a written DNC Policy and written DNC Procedures.
 - All employees and agents engaging in telemarketing shall be trained on the policy and procedures.
 - The Partner shall make a copy of the DNC Policy available to consumers upon request.
- **Not** place any telemarketing calls using prerecorded messages.
- **Not** send any advertisements or other marketing communications via text message.



TELEMARKETING REQUIREMENTS

Partners who conduct inbound or outbound telemarketing, including those with both a customer service and marketing component, shall:

- **Not** make any calls to cell phone numbers using an automatic telephone dialing system (ATDS) without the called party's prior consent.
 - *Telemarketing Calls:* Partners shall not use an ATDS to make telemarketing calls to cell phone numbers unless the party has provided "prior express written consent" (PEWC), as defined in 47 C.F.R. § 64.1200(f).
 - *Non-Telemarketing Calls:* Partners shall not use an ATDS to make non-telemarketing calls to cell phone numbers unless the called party has provided PEWC.
 - *Identifying Cell Phone Numbers:* If a Partner uses an ATDS to make any outbound calls, it shall purchase the Wireless Block Identifier File and the Intermodal Ported Telephone Number Service (Ported Number List) to identify and remove cellular telephone numbers from its calling lists unless the Partner has the requisite level of consent (as outlined above) for such calls.
 - *Exemption Substantiation:* Partners shall retain proof of prior express consent and/or PEWC in accordance with the recordkeeping requirements outlined below.
 - *State Laws:* Partners shall comply with all state laws and regulations that restrict calls to cell phone numbers.



TELEMARKETING REQUIREMENTS

Partners who conduct inbound or outbound telemarketing, including those with both a customer service and marketing component, shall:

- Require all employees and agents who solicit Careington products undergo ongoing compliance training.
- Using these Guidelines, implement policies and procedures, routinely monitoring all employees and agents who solicit Careington products.
- Register as a telemarketer in all required states.
 - Partner shall provide substantiation to Careington of any telemarketing registration exemptions.



TELEMARKETING REQUIREMENTS

Partners who conduct inbound or outbound telemarketing, including those with both a customer service and marketing component, shall:

- **Not** abandon any outbound telemarketing calls unless the requirements set forth in this section are met. A call is "abandoned" if it is not connected to a live representative within two seconds of the called party's completed greeting.
 - *Abandonment Rate:* Partners shall ensure that no more than 3% of calls completed to live consumers are abandoned.
 - *Ring Time:* Partners shall ensure that the consumer's phone shall ring at least 4 times or for 15 seconds.
 - *Recorded Message:* Within 2 seconds after the consumer's greeting, a Partner abandoning a call shall provide a prerecorded identification message containing only:
 - Name and telephone number of entity on whose behalf call was placed
 - Statement call was for "telemarketing purposes"
 - Instructions on using the mandatory automated, interactive opt-out mechanism during the call, which will record consumer's number to Partner's DNC list and immediately terminate the call.



TELEMARKETING REQUIREMENTS

Calling Times and Days

Partners shall **only** make outbound telemarketing calls:

- Between 8 a.m. and 9 p.m. at the called party's location
- On any day, except Sundays or holidays, or as further restricted under relevant state laws.



TELEMARKETING REQUIREMENTS

All telemarketing scripts shall disclose:

- Identification:
 - Name of the individual caller
 - Partner's legal name
 - Purpose of the call is to sell goods or services
 - Nature of the goods or services being offered
- That the call may be recorded (immediately after the identification disclosures).
- Partner's telephone number or postal address.



TELEMARKETING REQUIREMENTS

All telemarketing scripts shall disclose:

- Prior to making a sale or charging a payment card:
 - The total cost of the goods or services offered
 - Any material restrictions, limitations, or conditions attached to the offer
 - Cancellation and refund policy (or lack thereof)
- All other disclosures required under federal or state laws and regulations.

All inbound or outbound telemarketing scripts require written approval from Careington. Changes must be resubmitted to Careington for approval.



TELEMARKETING REQUIREMENTS

- Caller ID must be accurate with valid name and phone number.
- All inbound and outbound telemarketing calls shall be recorded from start to finish.
 - Call recording disclosure at the beginning of all calls. All employees and/or agents handling calls shall sign a consent to record form.
 - Call recording and storage practices must comply with the Payment Card Industry (PCI) Data Security Standards.



RECORD-KEEPING REQUIREMENTS

- Partners shall keep all records related to their marketing, telemarketing and/or sales activities for at least 5 years and provide them to Careington within 10 business days of request.



RECORD-KEEPING REQUIREMENTS

Required records include, but are not limited to:

- Copies of all scripts, advertisements and marketing/promotional materials
- Copies of all training materials (sales and compliance)
- Call logs and disposition records
- Call recordings
- Internal DNC list
- DNC Policy and Procedures
- Copies of all telemarketer registrations
- Proof of DNC list subscriptions and records of DNC scrubbing
- Proof of applicable DNC exemptions and exemptions for calls to cell phones using an ATDS
 - Must be kept for 5 years from the date of the last call made to that consumer
- Abandoned call safe harbor records
- Quality assurance forms



RECORD-KEEPING REQUIREMENTS

Required records include, but are not limited to:

- Employee records, including:
 - Employee name
 - Any fictitious name used
 - The last known home address and telephone number
 - Job title
 - Documentation of compliance training
- Customer records, including:
 - The name and last known address of each customer
 - The goods or services purchased
 - The date such goods or services were provided
 - The amount paid by the customer for the goods or services
 - If prizes of \$25 or more are offered, the name and last known address of each prize recipient (along with the prize awarded)



RECORD-KEEPING REQUIREMENTS

Required records include, but are not limited to:

- Records of all complaints, lawsuits, investigations and/or subpoenas received from consumers or third parties related to the Partner's marketing or sales practices, including documentation of what actions were taken by the Partner to resolve the underlying issues.



SAVINGS PLANS VS. INSURANCE

Careington's savings plans offer value, convenience and affordability.

Savings plans are becoming increasingly popular as the cost of dental and vision care rises, and the value in traditional dental and vision insured plans declines.

Most traditional insured dental plans now have annual maximums around \$1,000-\$1,500, limiting the amount of coverage for plan users.

Comparison Chart

| Plan Features | Savings Plans | Insurance |
|------------------------------|---------------|-----------|
| Waiting Periods | No | Yes |
| Claim Forms & Paperwork | No | Yes |
| Deductibles | No | Yes |
| Annual Maximums | No | Yes |
| Limits on Use | No | Yes |
| Savings on Cosmetic Services | Yes | No |



DENTAL

- Excellent option for the rising number of people whose employee benefits don't include dental care.
- Members get deep discounts on routine dental procedures.
 - Cleanings, check-ups, x-rays and more
- Members also save on major work and specialty procedures
 - Braces, root canals, cosmetic dentistry and more
- Careington operates the Maximum Care Dental Network, giving members access to dentists across the country.
- Careington networks are a leader in member-transparent pricing with robust fee schedules.



VISION

- Members can save on eye exams, eye glasses, lenses, contacts and more.
- Participating points of care in retail and medical locations all over the country, so members can get care no matter where they are.
- Preferred providers can detect signs of serious health conditions like glaucoma, diabetic eye disease, high blood pressure and high cholesterol.



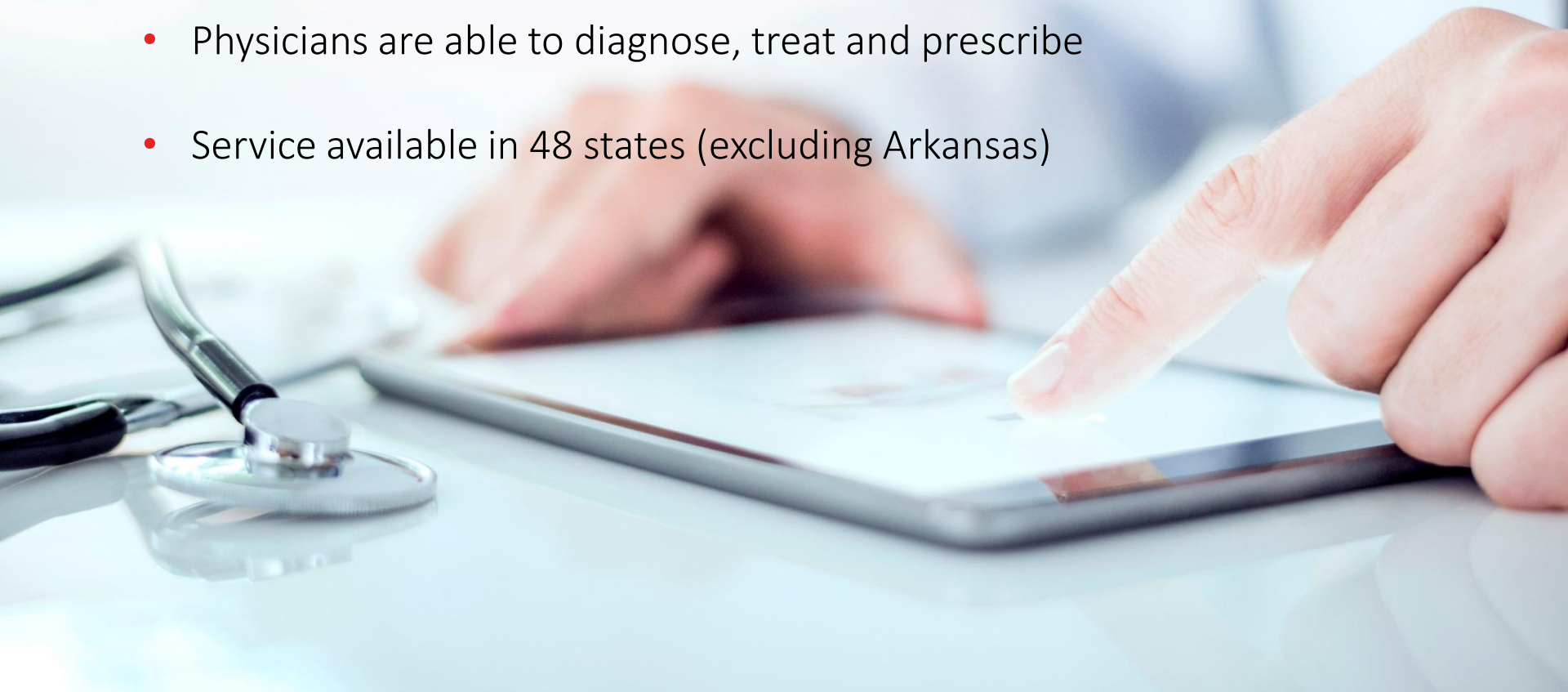
TELEMEDICINE

- Members get 24-hour access to a physician telephone line to talk to a real doctor for simple medical issues and receive diagnosis and further treatment recommendations.
- Doctors can even write prescriptions right over the phone.
- This can help members avoid costly and unnecessary trips to the doctor's office, ER or urgent care center.



TELEMEDICINE AT A GLANCE

- 24 x 7 x 365 physician access
- Available by phone, video or email
- Physicians are able to diagnose, treat and prescribe
- Service available in 48 states (excluding Arkansas)



OUR PRODUCTS AS VALUE-ADDS

- Careington products can be added to new or existing insurance plans as **value-adds**.
- These **value-adds** can be used after the benefits of the insurance plan have been exhausted.
 - *For example, a Careington dental discount product can be used when a member's dental benefits have been exhausted.*



DISCLOSURE

- The information contained in these Guidelines is not to be construed as legal advice, and does not create an attorney-client or any other relationship between Careington and its Partners. Careington recommends that each Partner retain its own legal counsel to ensure compliance with applicable laws and regulations.



CONTACT US

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Thank you!

