



SMS Limitations and Privacy Policy
as of July 8, 2024.

I. Purpose

The purpose of this policy is to be compliant with legal requirements, and the requirements dictated by RingCentral as it pertains to their Enhanced Business SMS [Terms of Service](#) and [Acceptable Use Policy](#). Thus, this document is to be in accordance with AT&T's Code of Conduct, the Short Code Monitoring Handbook, T-Mobile's Code of Conduct, and CTIA messaging guidelines as well.

II. Scope

This policy outlines general SMS guidelines as they are handled by CIMPAR SC, but especially in regards to use of the Avaya phone system.

III. Guidelines

- A. At this time, no active, automated marketing campaigns will be performed through the use of SMS, or "text messages". This may change with no notice with an updated SMS Limitations and Privacy Policy.
- B. We will not use purchased lists or third-party generated lead lists when sending SMS.
- C. We will not send more than 50 messages per originating number per minute.
- D. We will avoid using link shorteners and non-branded domains for embedded links in our SMS messages.
- E. In any automated messages...
 - a. Clear opt-out instructions will be provided. Opt-outs will be tracked and will not be re-entered into future campaigns.
 - b. Users will have to opt-in to receive messages from any texting campaigns. Opt-ins must have written permission to be included. Opt-ins will be tracked and maintained.

IV. Prohibited Campaigns

The following campaigns (use cases) are strictly prohibited across all of The Company's SMS efforts:

- Loan and mortgage advertisements
- Credit repair offers
- Debt relief offers
- Debt collection attempts
- Work from home advertisements
- Secret shopper advertisements
- Political advertisements and messages
- Alcohol, tobacco, or firearms advertisements



- Pharmaceutical, vitamin, or other drug advertisements
- Engaging in indirect lending (or otherwise are providing loans not financed directly by them), short-term high-interest loans, payday loans, or student loans
- Offering services for stocks, bonds, cryptocurrency, or other types of investment opportunities
- Engaging in or provide gambling or sweepstakes
- Engaging in credit repair, debt relief, debt collection, or tax relief services
- Promoting or providing work from home opportunities including but not limited to multi-level marketing opportunities
- Promoting, selling, or otherwise referencing products or services related to alcohol, tobacco (including vape), firearms, or fireworks
- Promoting, selling, or otherwise referencing substances defined as controlled substances under federal law, regardless of legality, including marijuana (cannabis)
- Promoting, selling, or otherwise referencing Kratom or similar substances, regardless of legality
- Buying, selling, or otherwise sharing SMS opt-in or phone numbers for the purpose of sending SMS with third-parties
- Engaging in third-party affiliate/lead generation, including the collection of information to be shared with loan providers, service providers, or for other lead generation purposes
- Campaigns that may be similar to the above

V. Prohibited Content

- The following message content is also strictly prohibited:
- Messages that engage in any illegal activity or otherwise violate the RingCentral terms of service, including the acceptable use policy
- 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, snowshoeing, etc.)
- CIMP PAR S.C. reserves the right to add to this list at any time or determine messages are prohibited at its discretion.