

lotum's Robocall Mitigation Plan includes the following:

- Outgoing calls from the system/application are for the purpose of manually inviting individual single participants, known to our customers (who are in all cases natural persons) to their conferences/meetings. These invitations are done manually via a web user interface with measures present to ensure that the person requesting such an invitation is a natural person and not any automated process or system. Customers are required to affirm that the calls they so request are to persons known to them.
- We keep detailed logs of all such outgoing call requests and are prepared to share such details in response to proper traceback requests from the FCC, law enforcement, and the Industry Traceback consortium
- We regularly monitor outgoing call activity for suspicious activity and are able to blacklist problem callers and/or callees with immediate effect.
- lotum does not deliver outgoing calls itself but via upstream providers, all of which are known by lotum to have implemented STIR/SHAKEN.