

Newtech Financial Services, LLC Robocall Mitigation Plan

This document will describe our communications use, and how we will prevent misuse on originating calls.

Area 1, the specific reasonable steps the provider has taken to avoid originating, carrying, or processing illegal robocall traffic as part of its robocall mitigation program:

We provide the service to our customers via a feature named 'Click to Call'. The way this feature works is by using Bandwidth, Inc voice services to bridge calls between the dealership employee's phone and the customer.

We limit the use of this feature in several ways. First the dealership must opt-in to use this feature, and then only employees using our CRM software are able to use the feature. All users must have an existing voice number, and we verify that number when setting up employee access.

The 'Click to Call' feature can only be used from within the CRM user interface, by the user signed into the software. Each time this feature is to be used; it can only be initiated by the user manually clicking a button in the software. When the user is viewing a customer's profile in the software that has a phone number, a button 'Click to Call' appears beside the phone number. The user must click this button, which will then bridge a call between the user's registered voice number and the customer's number.

There is no way to initiate these calls outside of the user interface, and there is no mechanism to queue up or automatically dial these numbers. The software user must manually open a customer's profile, and manually click a button to make/bridge these calls.

In addition, the mechanisms for originating these calls are internal APIs that are not published publicly and are secured so that they can only be used with the appropriate access tokens.

We feel that with the limited use of the voice systems from Bandwidth that it is not possible for the dealership users to do any sort of robocalls.

All call traffic is logged both by our system, and by Bandwidth. An audio recording (where allowed by law) is stored and can be reviewed for a period of time.

Area 2, how it complies with its obligation to know its customers and/or upstream providers, as applicable:

Our customers are dealerships (automotive, RV, powersports, etc.) who have contracted with us to use our software services that contain the voice call capabilities. Only the current employees of the dealership are permitted to use any voice features, and the feature must be opted into by the dealership, and permission granted to the employees for use.

Our upstream provider is Bandwidth, Inc, a publicly traded company headquartered in North Carolina. We have used them for quite some time and researched the reputation and their security and mitigation protocols before selecting them for use.

Area 3, the analytics system(s) it uses to identify and block illegal traffic:

We do not carry traffic that does not originate from the use of our 'Click to Call' feature, and after the call is made, the traffic is carried by Bandwidth, Inc, and we rely on their systems for analysis and blocking.

Area 4, whether it uses any third-party analytics vendor(s) and the name(s) of such vendor(s):

The only vendor we use is Bandwidth, Inc.