



Robocall Mitigation Plan

Traceback: Datahailer and our upstream provider, VoIP Innovations, commits to respond to all traceback requests from the Federal Communications Commission, law enforcement, and the registered traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls. We also commit to all voice traffic originating from our network being subject to this robocall mitigation program.

Know Your Customer: We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Datahailer screens all service applicants to determine if they are intending to use our services for autodialing from a database of numbers for the purposes of telemarketing without having received written permission from the parties called. Calls to wireline numbers for the purposes of political campaigning, market research or polling are deemed legal and are allowed.

New customer service capabilities are severely limited until the new customer completes a verification process which includes a live phone call with a Datahailer representative to confirm the customer is who they say they are and represents the company which they have signed up as or are representing.

Datahailer certifies that all of our customer systems are managed by us and will not be configured to perform calls that would violate calling guidelines. Actual Caller ID and phone numbers will be presented when sending calls

Service Termination: Datahailer requires its service users comply with laws prohibiting robocalling and blocks and / or terminates all services for those who breach these provisions.

Robocall Mitigation Program: Datahailer and our upstream provider, VoIP Innovations monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls by combining behavioral analytics, caller authentication and verification, our joint solution features:

- Fraud Detection: Detection of high volume robocalling, spoofing and spam call activity.
- Subscriber Notification: Caller ID Name override to warn subscribers of suspicious calls.
- Call Blocking Support: Accurate identification enabling you to block fraudulent phone calls as per the TRACED Act (2019)
- Business Number Verification: Register legitimate business numbers to prevent unintentional call blocking.
- Caller ID Name Service: Easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when call is determined fraudulent.

Datahailer and our upstream provider, VoIP Innovations, will only accept off network traffic for termination from third party carriers that are in the Robocall Mitigation database after September 28, 2021.