

To Whom It May Concern:

STRICTLY PRIVATE & CONFIDENTIAL

Robocall Mitigation

This document is intended to outline the steps taken to avoid originating illegal robocall traffic as part of our mitigation program.

Mitigation Measures

1. Due diligence checks are conducted in relation to all clients that we sign to confirm their business operations.
2. Our terms and conditions of service entered into with all clients contains an obligation to comply with all laws applicable to their use of the services supplied by dotdigital. This includes specific reference to measures we are permitted to undertake in relation to suspension or termination of the services (in whole or in part).
3. We have a process in place with our supplier for tracebacks in relation to call forwarding services. Any report or incident would be reported to us by their dedicated fraud team. Traceback requests are to be sent to voicesecurity@bandwidth.com, outlining the following:
 - a. The date / time of the call;
 - b. The calling telephone number; and
 - c. The called telephone number.

Relevant 47 CFR § 64.6304 Extension

Please note that the following 47 CFR § 64.6304 Extensions apply:

- (a) Small voice service provider.

This is on the basis that dotdigital has fewer than 100,000 voice service subscriber lines in the USA.

Yours sincerely



for and on behalf of dotdigital

Joseph Stoker
Head of Legal, Privacy & Compliance