

Vida Global, Inc.

Robocall Mitigation Plan

Effective: 07/01/2026

1. Overview

Vida Global, Inc. (“Vida”) operates an AI-powered voice agent platform that enables businesses to deploy conversational agents over the public switched telephone network (PSTN).

Vida is committed to preventing illegal robocalls and complying with:

- The TRACED Act
- The Federal Communications Commission (FCC) rules
- TCPA requirements
- Industry best practices outlined by the NANC Call Authentication Trust Anchor Working Group

Vida maintains a proactive robocall mitigation program incorporating identity vetting, traffic monitoring, consent enforcement, traceback participation, and abuse response controls.

2. Platform Architecture & Default Call Controls

2.1 Default Inbound-Only Configuration

By default:

- All AI Agents deployed on the Vida platform are **inbound-only**.
- Outbound calling capability is **disabled by default**.
- No customer has programmable API-based dialing access without prior approval.

This architecture materially reduces the risk of high-volume unsolicited outbound robocalling.

3. Outbound Calling Enablement Policy

Outbound calling is permitted only after enhanced review and management approval.

3.1 Enhanced KYC & Business Vetting

Before outbound calling is enabled, Vida conducts:

- Verification of legal entity
- Business use case review
- Review of marketing practices
- Confirmation of lawful industry category

High-risk verticals (lead generation, affiliate marketing, political messaging, debt collection without compliance controls, etc.) use cases are denied by default.

3.2 TCPA Consent Certification

Prior to activation of outbound calling:

Customers must certify in writing that:

- They have obtained appropriate prior express consent or prior express written consent where required under the Telephone Consumer Protection Act (TCPA)
- They maintain documented records of such consent
- Calls will be limited to the approved business use case

Vida reserves the right to:

- Request sample consent documentation
- Suspend outbound privileges upon complaint or irregularity
- Immediately terminate access for suspected unlawful activity

3.3 Daily Volume & Rate Limits

Vida enforces strict outbound traffic controls, including:

- Per-customer daily call caps
- Concurrent call limits
- Geographic restrictions where appropriate

These limits are calibrated to prevent:

- High-volume robocall bursts
- Traffic pumping schemes
- Rapid call pattern anomalies

Outbound limits may be reduced based on risk scoring.

4. Fraudulent Traffic Detection & Monitoring

Vida continuously monitors network traffic using behavioral analysis and anomaly detection models.

Monitoring includes:

- Calls per minute anomalies
- High abandon rates
- Elevated complaint signals
- Repetitive dialing sequences
- Abnormal ASR/ACD profiles

Automated triggers may result in:

- Immediate call throttling
- Temporary suspension
- Manual compliance review

Vida does not permit unrestricted auto-dialing or bulk programmable robocall campaigns.

5. Caller ID Integrity & STIR/SHAKEN

Vida maintains caller ID integrity controls:

- Customers may not spoof, alter, or falsify calling line identity (CLI).
- Numbers must be assigned or verified through approved onboarding.
- Unauthorized CNAM manipulation is prohibited.

Where applicable, Vida participates in STIR/SHAKEN attestation practices through upstream carrier partnerships and maintains number governance controls to preserve call authentication integrity.

6. Subscriber Protection & Call Blocking Support

Vida supports consumer protection through:

- Monitoring for fraudulent or abusive call patterns
- Cooperation with downstream providers for call blocking
- Prompt response to complaints
- Rapid mitigation of suspected unlawful traffic

Vida will block or suspend traffic that appears:

- Fraudulent
- Abusive

- Unlawful
- Outside the approved use case

7. Traceback Cooperation

Vida will:

- Diligently respond to all traceback requests from the FCC, law enforcement, and the registered traceback consortium
- Provide requested records consistent with applicable law
- Cooperate in identifying and stopping illegal robocall activity

8. Abuse Enforcement Policy

Any call originated on the Vida platform is subject to inspection and investigation if suspected of being:

- Fraudulent
- Abusive
- Deceptive
- In violation of TCPA or other applicable law

Enforcement actions may include:

- Immediate traffic suspension
- Outbound privilege revocation
- Account termination
- Referral to regulatory authorities where appropriate

Repeated or egregious violations may result in permanent removal from the Vida network.

9. Ongoing Risk Governance

Vida periodically reviews and updates this Robocall Mitigation Plan to reflect:

- Regulatory updates
- Industry guidance
- AI-generated call governance best practices
- Evolving fraud tactics

Management maintains oversight of compliance controls and outbound enablement approvals.

10. Terms of Service & Prohibited Use Enforcement

All customers of Vida are contractually bound by Vida's Terms of Service and Acceptable Use Policy, which expressly prohibit:

- Use of the platform for unlawful robocalling
- Calls made without required TCPA consent
- Spoofing, falsifying, or misrepresenting caller identification
- High-volume telemarketing outside the approved business use case
- Any deceptive, abusive, or fraudulent calling practices

Violation of Vida's Terms of Service constitutes grounds for immediate action, including but not limited to:

- Immediate suspension of calling privileges
- Revocation of outbound authorization
- Account termination
- Reporting to upstream carriers or regulatory authorities where appropriate

Vida reserves the right to suspend or terminate services without prior notice where illegal or abusive activity is reasonably suspected.

Customers are solely responsible for ensuring that all outbound communications comply with applicable federal, state, and local laws, including but not limited to the Telephone Consumer Protection Act and implementing regulations of the Federal Communications Commission.