



Unsolicited calls, Fraudulent calls and Robocall Mitigation Plan

1 Scope

SendMyCall implements a comprehensive Mitigation Plan designed to reduce and prevent unsolicited calls, robocalls, and fraudulent activities. This Mitigation Plan outlines the necessary actions to detect, prevent, and address such calls, ensuring that SendMyCall remains proactive in combating these threats and adhering to any regulatory measures and internal actions in response to such activities.

2 Introduction

Unsolicited calls, robocalls, and fraudulent calls pose significant risks to the telecommunications industry and its customers. At SendMyCall, we continuously assess and manage these risks as part of our robust risk management system. As a result, we have established clear policies and procedures to safeguard our services from abuse, ensuring a secure and trustworthy communication environment for our users.

3 Responsibilities

The Compliance Department Manager and staff are responsible for verifying Customer account, authorising access to services and monitoring account activity in conformity with the applicable laws and this plan.

Technical Department Manager and staff are responsible for system monitoring in search of any abnormal activity.

4 Prevention and management of service abuse

The aim of this plan is to ensure that SendMyCall is adequately equipped to protect its customers, brand, reputation and public interest from suspected or actual cases of service abuse or fraud. Management of unsolicited, robocalls or fraudulent calls mitigation plan consists of:

4.1 Proactive management

- 4.1.1 "Know Your customer" (KYC) procedures.
- 4.1.2 Constant high risk account monitoring.
- 4.1.3 New user verification and due diligence process.
- 4.1.4 Contract administration.
- 4.1.5 Constant call flows monitoring of abnormal irregular activity.

4.2 Reactive management

- 4.2.1 Cooperation with the reporting entities, participation in a trace back procedures.
- 4.2.2 Customer account activity audit.
- 4.2.3 Enforcement of the contract.
- 4.2.4 Corrective actions.