



Scale to Win Robocall Mitigation Plan

Scale to Win operates a software platform by which its customers can initiate text messaging or voice calls. Scale to Win's Dialer product is an application for making person to person voice calls. The application does not support "robocalling" features, or any mass dialing functionality (one-to-many calls). All voice calls are initiated by a human caller to the recipient. The application also includes security measures for callers and users to reduce compromised accounts and client data. Scale to Win also exercises reasonable due diligence in ensuring that its services are not used to originate illegal traffic. Customers are vetted and onboarded through a multi-step sales process and are provided with a Scale to Win log in by a customer success manager. The sales process allows Scale to Win to verify the identity and non-commercial intent of every new or renewing customer to further reduce security and robocall risks.

In addition to the above, Scale to Win takes the following steps to mitigate instances of robocalls through application design, security, and monitoring:

- Application uses voice service providers with full STIR/SHAKEN support to make all calls; as of September 2024 those service providers are Twilio, Sinch, and Bandwidth
- Application does not provide any way for Users to broadcast an audio recording to Contacts
- Application strictly enforces voicemails left on answering machines in accordance with the TRACED Act
- Application enforces email and Two Factor Authentication for Users
- Application enforces human interaction from Callers before initiating calls to Contacts
- Application does not provide any method for Caller to play an audio recording to a Contact
- Application records metrics on dials attempted, failed calls, calls connected, duration of calls, and wait time of Callers
- Anomalies in application metrics trigger alerts that are reviewed by Staff.