

**Robocall Mitigation Plan**  
**GlossGenius, Inc.**

**Other DBA Names:** None

GlossGenius, Inc. ("GlossGenius") submits the following Robocall Mitigation Plan in compliance with 47 CFR § 64.6305(d)(ii)-(iii)

**Reasonable Steps to Prevent New and Existing Customers from Originating Illegal Calls:**

*GlossGenius provides an AI Receptionist service that enables inbound voice calls only. The service does not facilitate outbound calling by customers or third parties.*

*Before customers can access voice services, we require:*

- *Legal company information including business name and physical address*
- *Credit card on file for account verification and billing purposes*
- *Acceptance of our Terms of Service and policies*

Our [Terms of Service](#) (Section 7) and [Acceptable Use Policy](#) prohibit customers from engaging in conduct that harasses or intimidates others, and from violating any applicable laws and regulations.

Under Section 13 of our [Terms of Service](#), customers explicitly represent and warrant compliance with the Telephone Consumer Protection Act (TCPA), CAN-SPAM Act, and all applicable Communications Laws and Industry Guidelines. Customers further warrant that they have obtained all required consents, permissions, and opt-ins from their clients in compliance with these laws.

Violations result in immediate service suspension and/or account termination pursuant to Section 19 of our [Terms of Service](#).

**Description of Analytics to Block Illegal Traffic:**

*GlossGenius employs multiple analytics systems and third-party services to identify and block fraudulent activity and illegal traffic across our platform, including voice services:*

*Internal Systems:*

- **Account-level monitoring:** *We maintain numerous account-level metrics to identify fraudulent and misbehaving accounts and users*
- **Risk scoring system:** *We use various risk indicators including [Maxmind](#) Score, [Emailage](#) Score, and fraud flags to assess user risk profiles*
- **Automated financial controls:** *We automatically block transfers when fraud flags are raised, which helps identify bad actors on our platform*
- **KYC verification:** *We verify user identities and flag discrepancies such as legal name mismatches and carrier registered name discrepancies*

- **Trust & Safety team:** Our dedicated Trust & Safety team moves quickly to ban suspected accounts and block sources of suspected fraud

*Third-Party Fraud Detection Services:*

- **Sift:** Third-party vendor that helps detect and prevent fraud and abuse by forming trust scores on user profiles
- **LogicLoop:** Real-time fraud detection monitoring
- **Maxmind:** Risk scoring analysis
- **Emailage:** Email risk scoring analysis
- **Bandwidth:** Our upstream voice provider also implements fraud detection and call analytics capabilities at the network level

*Additionally, we maintain Anti-Money Laundering / Counter Terrorist Financing policies that monitor transactions to reduce the potential for money laundering and other illegal activities.*

**Know Your Customer Practices:**

*GlossGenius serves beauty and wellness businesses through a verified onboarding process as outlined in our [Terms of Service](#).*

*Account Creation Requirements:*

*Under Section 5 of our [Terms of Service](#), customers must:*

- *Provide accurate, complete, and appropriate information when creating an account*
- *Confirm they are 18 years of age or older and either a legal resident of the United States, a United States citizen, or a business entity authorized to do business*
- *Provide business information including business name, physical address, and contact information*
- *Complete identity verification for account owners*
- *Accept Terms of Service that prohibit illegal communications*

*We have the right to verify any information submitted and to suspend or terminate any user that provides incomplete, inaccurate, or untrue information.*

*Voice Service Access Requirements:*

*Before customers can access voice services, we require:*

- *Legal company information including business name and physical address*
- *Credit card on file for account verification and billing purposes*

*Fraud-Based Account Actions:*

*Accounts identified as fraudulent or engaged in illegal activity are suspended or terminated. Our Trust & Safety team and automated fraud detection systems monitor for suspicious behavior and take action to protect the platform.*

**Other Practices to Prevent Unlawful Calls:**

*GlossGenius's voice service is strictly inbound-only for customer self-service purposes, including:*

- *Business hours inquiries*
- *Appointment booking and scheduling*
- *General business information requests*
- *Potential handoff to human staff when needed*

*We do not and will not:*

- *Originate outbound calls on behalf of customers to their clients*
- *Provide calling capabilities that allow customers to initiate outbound calls to third parties*
- *Support anonymous or unverified calling*
- *Enable mass calling or autodialing functionality*

*This limited, inbound-only use case significantly reduces robocall risk. The AI Receptionist only responds to incoming calls placed by individuals seeking to contact the business.*

#### **Know Your Upstream Provider Practices:**

GlossGenius contracts exclusively with Bandwidth Inc. as our upstream voice service provider. Bandwidth is a registered voice service provider in the FCC's Robocall Mitigation Database and maintains STIR/SHAKEN compliance.

Contractual Provisions:

Our service agreement with Bandwidth includes provisions requiring:

- Full compliance with all applicable FCC regulations including robocall mitigation requirements
- Implementation of fraud detection and call blocking measures at the network level
- Immediate notification of suspected fraudulent traffic
- Cooperation with traceback requests and law enforcement investigations
- Maintenance of current registrations in the Robocall Mitigation Database

Verification Practices:

We have verified Bandwidth's compliance through:

- Confirming their registration in the Robocall Mitigation Database
- Reviewing their STIR/SHAKEN compliance status

We maintain:

- Ongoing communication with Bandwidth regarding fraud prevention and detection capabilities
- Periodic review of service agreement compliance

#### **Commitment to Respond to Traceback Requests:**

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GlossGenius is willing and able to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

This Robocall Mitigation Plan describes the specific measures that GlossGenius has implemented as of January 20th, 2026. GlossGenius continually evaluates the efficacy of its measures to combat bad actors and takes appropriate steps to improve these measures when needed.