



GhostVM

RINGLESS VOICEMAIL

INTERNAL MITIGATION PROTOCOLS SUMMARY

GhostVM operates under a strict compliance-first framework designed to reduce regulatory risk, ensure lawful contact practices, and maintain data integrity across all campaigns.

INTERNAL MITIGATION & RISK CONTROLS



DNC SUPPRESSION (REAL-TIME + PRE-SCRUB)

All outbound activity is scrubbed against the National Do Not Call Registry (NDNC) and applicable State DNC lists prior to deployment. Internal suppression lists (including opt-outs and complaints) are also enforced in real time.



BLACKLIST & LITIGATION DATABASES

We integrate third-party suppression sources (e.g., litigator and complaint databases) to proactively exclude high-risk numbers.



OPT-OUT MECHANISMS

Every campaign includes clear and functional opt-out instructions (e.g., keypress removal via IVR or internal suppression logic), with immediate enforcement across all future campaigns.



FREQUENCY & CONTACT CONTROLS

Proprietary logic enforces limits on contact attempts, spacing, and campaign overlap to prevent excessive or abusive outreach patterns.



AUDIT LOGGING & TRACEABILITY

All lead activity, including source, timestamp, consent metadata, and delivery attempts, is logged and retained for audit and dispute resolution purposes.



PERFORMANCE MONITORING

Continuous review of campaign performance for abnormal complaint rates and key risk indicators to ensure ongoing compliance and source quality.

ONE-TO-ONE CONSENT VERIFICATION PROCESS



THIRD-PARTY CONSENT CERTIFICATION

We utilize industry-standard verification providers such as Jornaya (LeadID) and/or equivalent consent tracking systems to validate that each lead has provided explicit, prior express written consent.



CONSENT TOKEN STORAGE

Each lead record includes a unique consent identifier (e.g., LeadID token), which ties the consumer's opt-in to the specific publisher/source, timestamp of consent, IP address and user agent (where available), and full consent language presented at the time of opt-in.



CONSENT LANGUAGE REVIEW

All consent language is reviewed to ensure it meets TCPA requirements, including clear disclosure of contact intent, identification of parties who may contact the consumer, and no misleading or ambiguous phrasing.



SOURCE-LEVEL VALIDATION

Traffic sources are vetted prior to approval. Any source failing to provide verifiable consent records or compliant opt-in flows is immediately rejected or terminated.



ON-DEMAND PROOF OF CONSENT

For any lead, we can produce verifiable consent records, including the full opt-in path and certification data, upon request.



ONGOING COMPLIANCE MONITORING

- Continuous review of campaign performance for abnormal complaint rates
- Immediate suspension of traffic sources or campaigns that trigger compliance flags
- Periodic audits of consent records and data providers
- Alignment with evolving TCPA, FCC, and carrier-level enforcement standards



COMPLIANCE IS BUILT INTO EVERY CAMPAIGN.
PROTECTION FOR OUR CLIENTS.
RESPECT FOR CONSUMERS.



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Compliance-First. Results-Driven.