

Robocall Mitigation Program — Gata Labs Inc. (OneLocal)

Gata Labs Inc., operating as OneLocal, is a Canada-based SaaS company that provides business communication services — including SMS, MMS, and voice calling — to small and medium-sized businesses across North America. OneLocal's platform enables merchants to send appointment reminders, customer follow-ups, review requests, and other legitimate business communications to their customers.

OneLocal does not operate telecommunications facilities, does not assign or control telephone numbers, and does not originate calls directly onto the public switched telephone network (PSTN). All outbound calls are handed off to OneLocal's upstream voice service provider, Bandwidth Inc., which applies STIR/SHAKEN signing using their own certificates and attestation policies in accordance with FCC requirements.

OneLocal maintains the following Robocall Mitigation Program as required under FCC rules for non-facilities-based providers that do not implement STIR/SHAKEN directly.

1. Risk Assessment

OneLocal serves verified small and medium-sized businesses using the platform for routine, legitimate business communications such as appointment reminders, customer follow-ups, and local marketing outreach. OneLocal's customers do not originate high-volume or high-risk calling campaigns. OneLocal has no indication of illegal robocall activity occurring on its platform.

Based on customer type, usage patterns, and the controls described below, OneLocal assesses its risk of originating illegal robocalls as low.

2. Customer Due Diligence

OneLocal conducts customer verification and ongoing vetting to ensure platform access is restricted to legitimate businesses:

- Verification of customer identity and business information at onboarding
- Review of customer information when services are modified or expanded
- No anonymous or open self-signup; all accounts are reviewed before activation
- Enforcement of Terms of Service and Acceptable Use Policies allowing suspension or termination of any customer engaged in prohibited or abusive calling activities

These measures prevent anonymous or fraudulent use of OneLocal's services.

3. Prevention and Mitigation of Illegal Robocall Origination

OneLocal implements multiple layers of controls to prevent unlawful or fraudulent calling activity:

- Rate limiting and throttling to restrict the volume and frequency of calls an account may originate
- Acceptable Use Policies that explicitly prohibit illegal, unsolicited, or deceptive calling
- Monitoring of calling patterns for anomalies or abuse signals
- Immediate investigation of any reports or indicators of suspicious calling activity
- Suspension or termination of accounts that fail to remedy identified issues

OneLocal does not perform STIR/SHAKEN signing itself. All outbound calls are passed to Bandwidth Inc., which applies STIR/SHAKEN attestation using their own signing infrastructure in accordance with FCC requirements.

OneLocal also maintains a secure technical environment, including:

- Regular security assessments and vulnerability monitoring
- Secure development practices and internal security training
- Staff training on abuse prevention and acceptable use
- Vendor qualification and oversight procedures

These measures minimize the risk of unauthorized access to or misuse of the platform.

4. Response to Traceback Requests

OneLocal cooperates fully with traceback requests from the Industry Traceback Group (ITG), law enforcement, and other legitimate authorities. OneLocal has designated a primary and secondary point of contact responsible for responding promptly and coordinating with its upstream provider.

Primary contact:

Name: Sofia Palazzo

Title: Operations Manager

Email: sofia.p@onelocal.com

Phone: (647) 503-1959

Secondary contact:

Name: Paulo Moraes

Title: Support Team Lead

Email: paulo.m@onelocal.com

Phone: (647) 370-8514

OneLocal will respond fully and within 24 hours to all traceback requests and will cooperate with the FCC, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocall activity originating from its platform.

5. STIR/SHAKEN Status and Exemption

OneLocal does not originate calls on its own network and does not operate its own STIR/SHAKEN signing infrastructure. In accordance with 47 C.F.R. § 64.6304, OneLocal is exempt from direct STIR/SHAKEN implementation as a non-facilities-based provider. All outbound calls are signed downstream by Bandwidth Inc. using their certified STIR/SHAKEN implementation.

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