

## **Heartland Credit Union -Consumer Do-Not-Call Policy**

Heartland Credit Union adheres to all applicable and enforceable federal and state laws and regulations governing outbound telephone calls for the protection of the privacy of telephone consumers. Heartland Credit Union uses this Do-Not-Call Guideline to provide guidelines to follow applicable and enforceable federal and state Do-Not-Call laws for consumers.

### **PURPOSE**

The federal government, through the Federal Communications Commission ("FCC") and the Federal Trade Commission ("FTC"), and several states have enacted laws governing how companies contact consumers through use of the telephone.

### **PROCEDURES**

This Guideline prepares Heartland Credit Union employees to follow Do-Not-Call laws. Heartland Credit Union may change, revise or alter this Guideline to reflect changes in federal or state law or as business needs require. Employees involved with activities affected by this policy will receive training to enable them to take actions consistent with this policy.

### **Do-Not-Call Lists**

The federal government and several states have adopted "Do-Not-Call" lists that allow consumers to place their numbers on a list that prevents telephone solicitations, except in certain limited circumstances. Heartland Credit Union will not make outbound telephone calls to non-members and therefore does not subscribe to any federal or state Do-Not-Call lists. Should this situation change, Heartland Credit Union will follow all required processes to ensure phone lists are scrubbed against applicable state and federal Do-Not-Call lists, subject to applicable exceptions.

### **Do-Not-Call List Exceptions**

Most Do-Not-Call laws allow businesses and other entities to make telephone solicitations to certain consumers even though their number may appear on a Do-Not-Call list. Generally, these exceptions apply to (1) businesses with an "Established Business Relationship" with the consumer; (2) a consumer who has specifically consented to allow the business to call him or her; (3) charitable organizations; and (4) political entities. Given our business, the Established Business Relationship exception will apply most frequently to the activities we undertake for our consumer members and accountholders. Heartland Credit Union may contact consumer members and accountholders that fall within these exceptions, based on information received from each consumer member or accountholder.

### **Company-Specific Do-Not-Call Lists**

Do-Not-Call regulations allow a consumer to place his or her telephone number on a Company-Specific Do-Not-Call List that prohibits a business from contacting that consumer for solicitation purposes even if the consumer and the business have an Established Business Relationship. When a consumer member's or accountholder's phone number is placed in our internal Heartland Credit Union Do-Not-Call database, based on information provided by the member or accountholder, the request will become effective no later than 30 days after the request is made and recorded.

### **Use of Automated or Predictive Dialers**

Heartland Credit Union will not use automated or predictive dialers to place telephone solicitations. Should this situation change, Heartland Credit Union will comply with FCC rules.

### **Use of Artificial or Prerecorded Voices**

Heartland Credit Union will not use automated or prerecorded voices to place telephone solicitations. Should this situation change, Heartland Credit Union will comply with FCC rules.

### **Abandoned Calls**

Under the FCC's rules, when using an automated or predictive dialer Heartland Credit Union cannot disconnect an unanswered telephone solicitation call, when using an automated or predictive dialer until either 15 seconds have elapsed after the first ring, or after four (4) rings. The FCC classifies a telephone solicitation that does not meet these requirements as an "abandoned call". Heartland Credit Union will not use automated or predictive dialers to place telephone solicitations. Should this situation change, Heartland Credit Union will comply with FCC rules regarding abandoned calls.

**Wireless Telephone Numbers**

Heartland Credit Union will apply all FCC Do-Not-Call rules (for example, National Do-Not-Call Registry, Company Specific Do-Not-Call Lists) to wireless telephone numbers.

**Caller ID Requirements**

Heartland Credit Union will not block Caller ID information. In accordance with the FCC rules, Heartland Credit Union will transmit Caller ID information. Callers will be identified as calling from Heartland Credit Union.

**Time of Day Restrictions**

Heartland Credit Union employees will not place telephone solicitation calls to a residential telephone number before 8:00 a.m. or after 8:00 p.m. Monday thru Saturday (local time at the residential telephone number location).

**Identification of Telephone Solicitation**

Heartland Credit Union employees will make all telephone solicitation calls. If this situation should change, persons representing Heartland Credit Union for purposes of telephone solicitations will clearly state that they work for Heartland Credit Union, their name, the purpose of their call and provide to the caller a telephone number through which Heartland Credit Union may be contacted.

**Facsimile Restrictions**

Heartland Credit Union will not use facsimile machines, computers or any other device to send "unsolicited advertisements" to any consumer telephone facsimile machine.

**Do-Not-Call Training**

Heartland Credit Union requires employees directly involved in the placement of outbound telephone solicitations to undergo training on this Do-Not-Call Guideline.

**Handling Do-Not-Call Questions**

During a telephone call with a member or accountholder, employees may encounter requests: (a) for information about Do- Not-Call legislation; (b) to be placed on the National Do-Not-Call Registry; (c) to be placed on our Company-Specific Do-Not-Call List; or (d) for a copy of Heartland Credit Union's Do-Not-Call Guideline. Please handle each of these requests in accordance with the procedures set out below. If an employee receives a request from a consumer member or accountholder that does not fall within any of these categories, the employee is to contact his/her supervisor.

**Requests for Information about Do-Not-Call Legislation**

Unless instructed otherwise by Heartland Credit Union, employees are to direct consumer members or accountholders to the FCC's telephone number at 1-888-225-5322 or the FCC's website located at <http://www.fcc.gov/cgb/donotcall/>.

**Requests to be placed on the National Do-Not-Call List**

Unless instructed otherwise by Heartland Credit Union, employees are to direct consumer members or accountholders to the FCC's Do-Not-Call telephone number at 1-888-382-1222 or the FCC's website located at <http://www.donotcall.gov>.

**Requests to be placed on a Company-Specific Do-Not-Call List**

After first using normal Heartland Credit Union guidelines to verify that the person the employee is speaking with is a Heartland Credit Union member or accountholder, the employee is to ask for the consumer member's or accountholder's name, telephone number and Heartland Credit Union account number. Employee's training will include instruction on how to input this information into the Heartland Credit Union Specific Do Not Call database.

**Requests for a Copy of This Do-Not-Call-Guideline**

If a consumer member or accountholder asks for a copy of Heartland Credit Union's Do-Not-Call-Guidelines, the employee is to ask if they have access to the Internet. If so, the employee is to direct them to our online Do Not Call Guideline at [www.hcu.coop](http://www.hcu.coop). If the consumer member or accountholder prefers, the employee can confirm their name and address and forward that information to Heartland Credit Union's Member Support Center, who can then mail a copy of Heartland Credit Union's Do-Not-Call Guideline to the consumer member or accountholder.

**Written Guideline**

This Guideline serves as Heartland Credit Union's written Do-Not-Call Policy as required by FCC Rules.

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