

DNC Guidelines for UA Agents

What is the National Do Not Call Registry?

The National Do Not Call Registry (National Registry) is a list of registered residential and cell phone numbers belonging to consumers who do not want to receive telemarketing calls. With a few exceptions, if a person's phone number appears on the National Registry, federal law prohibits telephone solicitation calls to the registered number. The law also prohibits any person or entity from initiating any telephone solicitation to any residential telephone subscriber before the hour of 8 a.m. or after 9 p.m. (local time at the called party's location). In addition to the National Registry, many states, and our Company, maintain Do Not Call lists. Consumers may register home phone numbers and cell phone numbers on any or all of them.

Exemptions to Do Not Call

If you have an 'established business relationship' with a customer, federal Do Not Call provisions generally do not apply. An 'established business relationship' is limited to:

- *Active Policyholder*— Anyone with individual or group coverage (including covered members of a group policy).
- *Lapsed Policyholder* — Anyone who had an established business relationship with the Company, but contact for solicitation purposes is limited to an 18-month period following the date of last payment.
- *Inquiries* — Individuals who inquire or request information or complete an application with the Company within the past three months.

The exemption applies to both active and lapsed policyholders, but the business relationship and the exemption terminate immediately if the consumer requests not to be called.

Do Not Call provisions do not apply to calls between a telemarketer and a business, but a business can request its number be added to the Company's Do Not Call list. Referrals are **not** exempt from Do Not Call provisions.

The Following Fines Apply to Do Not Call Violations

Federal: Up to \$41,484 per call

State: Up to \$10,000 per call

Private Suits: Up to \$500 per call

Guidelines to Help Ensure Do Not Call Compliance

- Make calls only from phones that provide accurate caller identification information. No call spoofing. You must make calls from your actual telephone number and so no calls can be made from using an automatic telephone dialing system.
- Always give your name, the Company name, and the purpose of the call at the beginning of each call.
- Provide your telephone number for call-backs.
- Only make telephone solicitation calls from 8 a.m. to 9 p.m. in the time zone you are calling and never on holidays.
 - While the federal calling times provide the foundation of when a call can be made, several states have more restrictive rules. When a state has a more restrictive call time rule, you must follow those state call time restrictions unless an established business relationship will provide an exemption from that state's call time restrictions, which may subject to change. It is your responsibility to verify if certain exemptions apply in your state.
 - While many legal holidays are recognized nationwide, there are some variations from state to state. Calls are prohibited on state-specific holidays, which may subject to change. It is your responsibility to verify if certain state-specific holidays apply in your state.
- There are 14 states (*AK, FL, ID, IN, KS, KY, MI, ND, NE, NV, OR, SD, TN, TX*) that have 2 time zones, so you will need to pay close attention to which time zone the consumer resides in.

- As a courtesy, place no more than 3 outbound call attempts per day to any one consumer.
- The Company strongly discourages the use of any automated software that dials or text messages customers or policyholders. Please email AskCompliance@torchmarkcorp.com if you wish to use such technology.
- All outbound telephone solicitation leads' telephone numbers must be cross-referenced against the Do Not Call Search Form at UAOnline.
- If anyone requests that you don't call them again, you must immediately record the person's full name, phone number, address if available, policy number if available, and have your Manager e-mail the Home Office with the request.
- If you are asked by anyone to provide a copy of the Company's Do Not Call Policy, you must also immediately record the date of the request, the person's full name, phone number, mailing address, policy number if available, and have your Manager e-mail the Home Office at agency@torchmarkcorp.com with the request. A copy of the Company's Do Not Call Policy will then be provided by the Home Office. To review a copy of the Do Not Call Policy, see Exhibit A.

Exhibit A:

UNITED AMERICAN INSURANCE COMPANY DO NOT CALL POLICY

What is the National Do Not Call Registry?

In 2003, a National Do Not Call Registry (National Registry) was established through the efforts of the Federal Trade Commission (FTC) and the Federal Communications Commission (FCC). The National Registry is a list of telephone numbers (residential and cellular) from consumers who do not want to receive telephone solicitation calls. If an individual's telephone number appears on the National Registry, telephone solicitation calls are prohibited to the registered telephone number.

Subject to the Company-Specific Do Not Call List discussed below, the Do Not Call provisions do not apply if the Company already has an established business relationship with a consumer. Even if a consumer's telephone number is on the National Do Not Call Registry, the Company may place a telephone solicitation call to the registered number if the Company has an established business relationship with that consumer. An 'established business relationship' is limited to:

- *Active Policyholder*— Anyone with individual or group coverage (including covered members of a group policy).
- *Lapsed Policyholder* — Anyone who had an established business relationship with the Company, but contact for solicitation purposes is limited to an 18-month period following the date of last payment.
- *Inquiries* — Individuals who inquire or request information or complete an application with the Company within the past three months.

Company-Specific Do Not Call List

Under the Do Not Call provisions, the Company must create and maintain a Company-Specific Do Not Call list. If a consumer specifically requests the Company not make future contact for solicitation purposes, the Company is required to place the consumer's telephone number on the Company-Specific Do Not Call list, and the Company may not contact the consumer again. This applies even if there is an established business relationship with the consumer.

State-Specific Do Not Call Lists

Various states have also enacted statutes establishing their own Do Not Call or "No Call" lists (State-Specific Lists). If an individual's telephone number appears on a State-Specific List, the applicable state law prohibits telephone solicitation calls to the registered telephone number. Like the National Registry, the State-Specific laws generally do not apply if the Company already has an established business relationship with a consumer.

Compliance

To ensure compliance with Do Not Call provisions:

- Persons who make telephone solicitation calls on the Company's behalf are trained on the Company's procedures regarding the Do Not Call provisions, and provided with the Company's written Do Not Call procedures that are updated periodically. The training and established procedures include the Company's obligation to ensure telephone numbers are cross-referenced against the most recent Company-Specific Do Not Call list, National Registry and State-Specific Lists, if applicable, no more than 31 days prior to the date any call is made. Training and documentation of these procedures is provided in the form of Company correspondence, discussions at Company meetings, and/or articles appearing in the Company's agency magazines.
- The Company informs all persons who have customer contact of the existence of the National Registry, the Company-Specific Do Not Call list and the State-Specific Lists (as applicable) and trains them regarding Do Not Call procedures before they have contact with consumers.
- The Company has established a Company-Specific Do Not Call list to record the telephone numbers of consumers who request not to be called by the Company. All persons having direct contact with consumers are advised of the existence of the Company-Specific Do Not Call list. These individuals are informed and trained to immediately record and process any requests for additions to the list as described below:
Obtain the following information: Date of Request, Requestor's Name, Telephone Number, and Policy Number (if applicable). However, requests will be honored even if the Requestor provides only a telephone number.
- The Company purchased the National Do Not Call Registry, which is updated on a regular basis.
- The Company purchases and/or uses any State-Specific Lists as applicable.
- Do Not Call requests that are received by Home Office personnel are processed.
- Company policy is to honor a consumer's Do Not Call request within 30 days, or sooner, if possible. Company records of consumers requesting not to be called by the Company are retained for a minimum of five years.
- The Company trains designated Home Office personnel who handle Do Not Call requests on how to add them to the Company-Specific Do Not Call list.

This Do Not Call Policy will be reviewed periodically by the Company for compliance purposes.

If you have any questions, comments, or concerns please contact us at:

United American Insurance Company
Attention: Customer Service
3700 S Stonebridge Dr.
McKinney, TX 75070
Email: eservicecenter@unitedamerican.com