



**PURE CALLERID**

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# **KYC Compliance Process**



# PURE CALLERID

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## Document Control

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- Prepared by: Derek Oberholtzer

## Revision History

Version	Date	Description of Changes	Changed by
1.0	05/01/2023	Initial document creation	Jorge M
1.1	06/15/2023	Updated to include expanded requirements for existing customers	Derek O



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1. **Introduction** Pure CallerID is committed to the highest standards of regulatory compliance and customer trust. This document outlines the Know Your Customer (KYC) process that is critical for maintaining the integrity and legality of our operations.

2. **Scope** This KYC policy applies to all new and existing customers of Pure CallerID and is designed to comply with a comprehensive range of regulations and laws, including but not limited to:

- ⇒ The Telephone Consumer Protection Act (TCPA)
- ⇒ The Telemarketing Sales Rule (TSR)
- ⇒ The Truth in Caller ID Act
- ⇒ State-level telecommunications privacy laws
- ⇒ Data protection regulations such as the General Data Protection Regulation (GDPR) for European customers and the California Consumer Privacy Act (CCPA) for California residents

2.1. Industry-specific regulations such as the Health Insurance Portability and Accountability Act (HIPAA) for healthcare-related communications, the Gramm-Leach-Bliley Act (GLBA) for financial services, and others as applicable to the nature of the customer's business.

This policy is also in alignment with best practices for customer data verification as recommended by the Federal Communications Commission (FCC) and the Federal Trade Commission (FTC). Pure CallerID is committed to regular reviews and



updates of this policy to ensure ongoing compliance with all relevant and current legal requirements.

3. **KYC Requirements for New Customers** New customers are required to complete a comprehensive corporate documentation package to ensure adherence to Pure CallerID's stringent compliance standards. This package includes, but is not limited to:

- 3.1. **Business Process Documentation** A detailed description of their business processes, including customer interaction protocols and data handling procedures.

- 3.2. **Brand Ownership** A comprehensive list of all brands owned and operated, including any DBAs (Doing Business As) or subsidiary entities.

- 3.3. **Compliance with Communication Regulations** An overview of compliance processes related to outbound calling and SMS messaging, ensuring adherence to:

**Opt-in policies** Documentation of procedures for obtaining and recording affirmative consent from individuals before sending calls or messages.

**Proof of opt-in** A system for maintaining verifiable proof of consent, including date, time, and method of opt-in.

**Record retention policies** Procedures for the storage and retrieval of consent records in accordance with legal requirements.



**3.4. Marketing and Outreach** Detailed descriptions of marketing sources and outreach methods, including: The nature and source of lead generation activities; Strategies for ensuring that all data used for outreach purposes is collected in compliance with relevant consent policies; and Methods for documenting and verifying the consent for each lead or contact.

**3.5. Corporate and Regulatory Documentation** Submission of corporate documentation, including Employer Identification Number (EIN) and any related registration data.

For sectors such as healthcare, finance, insurance, and real estate, additional documentation may be required to demonstrate compliance with industry-specific regulations such as HIPAA, GLBA, etc.

**3.6. Random Compliance Audits** Agreement to comply with random compliance checks conducted by Pure CallerID, which may include the selection of a sample of up to 50 records at any given time without prior notice. The review of these records to ensure they meet all compliance standards, including proper documentation of opt-ins and adherence to communication regulations. The provision of immediate remediation plans for any discrepancies found during such audits.

**3.7. Annual Compliance Review** A commitment to participate in an annual review process to ensure ongoing compliance with Pure CallerID's policies and evolving regulatory requirements.



By fulfilling these requirements, new customers affirm their commitment to upholding the highest standards of data integrity and regulatory compliance, which are foundational to the trusted partnership with Pure CallerID.

4. **KYC Requirements for Existing Customers** To maintain the integrity of our services and ensure ongoing compliance with regulatory standards, existing customers of Pure CallerID are subject to an annual review process. This review is designed to confirm the accuracy of our records and the adherence to our compliance framework. The annual review includes, but is not limited to, the following components:

4.1. **Information Accuracy Verification** A thorough check to ensure that all previously provided information remains current and accurate. A requirement for customers to report any changes to their business details, contact information, or operational procedures within a specified timeframe.

4.2. **Corporate Changes Updates** Notification and documentation of any changes in corporate structure, ownership, or operations that may affect compliance status. Submission of updated corporate documentation reflecting any such changes, including new EINs, regulatory licenses, or certifications.

4.3. **Compliance Reassessment** A reassessment of the customer's adherence to outbound communication regulations, including a review of opt-in and consent records for accuracy and validity; Evaluation of the procedures for obtaining and



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storing proof of opt-in; and Confirmation that opt-out requests are honored in a timely and efficient manner.

- 4.4. Marketing and Outreach Verification** An audit of marketing sources and outreach methods to ensure ongoing compliance with consent and data protection laws. Verification that all data used for outreach is collected and managed in accordance with the latest legal requirements and best practices.
- 4.5. Random Compliance Audits** Agreement to comply with non-scheduled, random compliance checks conducted by Pure CallerID, which may include the examination of a random sample of records to ensure compliance with KYC, data integrity, and communication regulations; and the provision of immediate corrective action plans for any non-compliance issues identified during such audits.
- 4.6. Documentation of Compliance Efforts** Maintenance of comprehensive records detailing all compliance efforts, training, and policy updates. Availability of these records for review by Pure CallerID during the annual review or random audits.
- 4.7. Training and Awareness** Evidence of ongoing training programs for staff to ensure they are informed of and are adhering to the latest compliance and regulatory requirements. Documentation of any new training or policy acknowledgments by staff members.





**4.8. Data Protection and Privacy** Reaffirmation of commitment to data protection and privacy standards as per the latest regulations. Review and update of data security measures and privacy policies to safeguard customer information. By participating in this comprehensive annual review, existing customers demonstrate their commitment to compliance and partnership with Pure CallerID, ensuring that both parties uphold the highest standards of operational integrity and regulatory adherence.

**5. Procedure** The KYC submission and review process is structured to ensure a seamless and efficient experience for our customers while maintaining the highest standards of compliance. The following steps outline the procedure:

**5.1. Document Submission** Customers are required to submit all necessary KYC documentation through our secure customer support portal. For new customers, this step is part of the onboarding process. Existing customers are prompted to submit updated documents as part of their annual review or as requested by Pure CallerID for compliance verification purposes.

**5.2. Review and Assessment** Upon receipt of the documentation, our dedicated compliance team will conduct a thorough review. This process is to be completed within thirty days of submission. The review may result in:

**Clearance** If all documents meet our compliance standards, we will issue a clearance.



**Additional Documentation Request** Should there be a need for further information or clarification, we will request additional documentation. This step must be completed before any potential escalation.

**Escalation** In cases where significant compliance issues are identified, the matter will be escalated to our senior compliance officers for further investigation and resolution.

**5.3. Confirmation of Status** Following the review, customers will receive official communication regarding their KYC status:

**Approval Confirmation** A formal approval will be communicated to the customer, confirming the successful completion of the KYC process.

**Information Request** If additional information is required, customers will receive a detailed request outlining the specific documents or clarifications needed to proceed with the compliance review.

**5.4. Ongoing Communication** Pure CallerID is committed to maintaining open lines of communication throughout the KYC process. Customers are encouraged to reach out through the customer support portal for any questions or assistance needed during the submission or review process. By adhering to this procedure, Pure CallerID ensures that all necessary KYC requirements are met in a timely and efficient manner, thereby upholding the standards of service and compliance that our customers expect and deserve.



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**6. Compliance and Monitoring** Pure CallerID is dedicated to upholding the highest standards of compliance across all aspects of our operations. To this end, we engage in regular and rigorous monitoring activities. These activities are designed to verify continuous adherence to our KYC policy, telecommunications regulations, and data protection laws.

**6.1. Monitoring Activities** Routine audits of customer accounts to ensure the accuracy and completeness of KYC information. Systematic checks of outbound communication practices to confirm compliance with opt-in and opt-out regulations. Analysis of data handling and storage procedures to ensure alignment with privacy laws and best practices.

**6.2. Non-Compliance Consequences** In the event of non-compliance, Pure CallerID may take actions including, but not limited to: issuance of a formal notice detailing the specific areas of non-compliance; a request for immediate remedial action to address the deficiencies identified; suspension of services until compliance is restored; and termination of the customer account for severe or repeated non-compliance.

**6.3. Compliance Inquiries** For any questions or concerns regarding compliance matters, customers are encouraged to contact our Compliance Department directly. Contact Information:

Email: [compliance@purecallerid.com](mailto:compliance@purecallerid.com)

Phone: (844) 787-3243



Mailing Address:

Pure CallerID

Attn: Compliance Department

30 N Gould St Sheridan, WY 82801

**6.4. Commitment to Support** Pure CallerID is committed to providing support and guidance to our customers to facilitate ongoing compliance. We offer resources and assistance to help customers understand and meet their compliance obligations. By engaging in proactive compliance and monitoring efforts, Pure CallerID aims to foster a culture of transparency and responsibility, ensuring that our services remain trustworthy and compliant with all applicable laws and regulations.

**7. Data Protection and Privacy** We recognize the critical importance of data protection and privacy for our customers. Our commitment to safeguarding customer data is unwavering, and we adhere strictly to all applicable data protection laws and our comprehensive privacy policy.

**7.1. Data Protection Compliance** We ensure compliance with international, federal, and state data protection laws, including but not limited to the General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), and other relevant privacy legislation. Our data protection measures are designed to meet or exceed the requirements set forth by these regulations, providing peace of mind to our customers.



**7.2. Privacy Policy Adherence** Our privacy policy is transparent, easily accessible, and clearly communicates how customer data is collected, used, stored, and shared. We regularly review and update our privacy policy to reflect the latest legal requirements and best practices in data privacy.

**7.3. Data Security Measures** We implement robust security measures to protect customer data against unauthorized access, disclosure, alteration, and destruction. These measures include, but are not limited to, encryption, access controls, secure data storage solutions, and regular security audits.

**7.4. Data Handling Procedures** All employees and contractors of Pure CallerID are trained in proper data handling procedures and are required to adhere to strict data protection protocols. We conduct regular training sessions to ensure that our team is up-to-date with the latest data protection practices and regulations.

**7.5. Customer Data Rights** We fully support our customers' rights to access, correct, delete, or transfer their data, as provided by applicable data protection laws. Customers can exercise their rights by contacting our Data Protection Officer through the provided channels.

**7.6. Breach Notification** In the unlikely event of a data breach, we have a robust breach notification process in place to inform affected individuals and relevant authorities in a timely manner, as required by law.

**7.7. Continuous Improvement** Our approach to data protection and privacy is based on continuous improvement. We regularly assess our data protection



strategies and make necessary adjustments to address emerging threats and changes in the regulatory landscape.

**7.8. Contact Information for Privacy Concerns** For any privacy-related inquiries or concerns, customers can reach out to:

Data Protection Officer: Derek Oberholtzer

Email: [derek@purecallerid.com](mailto:derek@purecallerid.com)

Phone: (844) 787-3243

By maintaining these rigorous data protection and privacy standards, Pure CallerID ensures that our customers' data is handled with the highest level of security and confidentiality.

## 8. Appendices

8.1. Appendix A: KYC Document Checklist

8.2. Appendix B: KYC FAQs



## KYC Document Checklist

### For New Customers

- Completed KYC Application Form
- Detailed Business Process Description
- List of Owned and Operated Brands
- Compliance Process Overview for Outbound Calling and SMS Messaging
- Marketing Sources and Outreach Method Descriptions
- Corporate Documentation
  - Articles of Incorporation or Organization
  - Business License(s)
  - Employer Identification Number (EIN) Documentation
  - Proof of Business Address (e.g., utility bill, lease agreement)
- Industry-Specific Regulatory Compliance Documents (if applicable)
  - HIPAA Compliance Documentation (for healthcare)
  - GLBA Compliance Documentation (for financial services)
  - State Insurance License(s) (for insurance companies)
  - Real Estate License(s) (for real estate businesses)
- Proof of Opt-In for Marketing Communications
- Data Privacy and Protection Policies
- Contact Information of Compliance Officer or Equivalent

### For Existing Customers (Annual Review):



- Updated KYC Information Form
- Current Business Process Description
- Updated List of Owned and Operated Brands
- Revised Compliance Process Documentation (if any changes have occurred)
- Updated Marketing Sources and Outreach Methods (if applicable)
- Updated Corporate Documentation (if any changes have occurred)
- Current Industry-Specific Regulatory Compliance Documents (if applicable)
- Recent Proof of Opt-In Records and Procedures
- Updated Data Privacy and Protection Policies (if any changes have occurred)
- Confirmation of Training on Compliance and Data Protection (if conducted)

**General Requirements:**

- Signed Declaration of Accuracy and Completeness
- Consent to Undergo Random Compliance Audits by Pure CallerID
- Acknowledgment of Pure CallerID's Data Protection and Privacy Policies





## **KYC FAQs**

### **Why is a KYC process necessary?**

The KYC (Know Your Customer) process is a standard compliance requirement that helps prevent identity theft, financial fraud, money laundering, and terrorist financing. It also ensures that our services are not misused for illegal activities.

### **What documents are required for the KYC process?**

The required documents typically include a completed KYC application form, business process descriptions, lists of owned and operated brands, compliance documentation for outbound calling and SMS messaging, marketing sources, corporate documentation (such as EIN, business licenses, and articles of incorporation), and industry-specific regulatory documents, among others. Please refer to the KYC Document Checklist for a detailed list.

### **How often do I need to update my KYC information?**

Existing customers are required to update their KYC information annually. However, if there are any significant changes to your business operations, structure, or compliance procedures, you should update your information as soon as possible.

### **What happens if I do not comply with the KYC requirements?**



Non-compliance with KYC requirements can result in a range of actions, from a request for immediate submission of missing documents to suspension of services or account termination in severe cases.

**How is my data protected during the KYC process?**

We adhere to strict data protection laws and our privacy policy to ensure that all customer data is handled securely. Measures include encryption, access controls, and regular security audits.

**Can I face any legal consequences for providing inaccurate information?**

Yes, providing false or misleading information can have serious legal consequences, including potential fines and legal action.

**What is the process for submitting KYC documents?**

KYC documents should be submitted through our secure customer support portal. New customers will do this as part of the onboarding process, while existing customers will submit documents as part of their annual review.

**Who can I contact if I have questions about the KYC process?**



For any questions or assistance with the KYC process, please contact our Compliance Department at the provided contact information in your MSA or contact your CSM for details.

**What is the review process for KYC submissions?**

Our compliance team reviews all KYC submissions within thirty days. You will receive a confirmation of approval or a request for additional information if needed.

**What are random compliance audits?**

Random compliance audits are unscheduled checks we conduct to ensure ongoing adherence to compliance standards. We may review a sample of records to verify that they meet all compliance requirements.