

DO NOT CALL POLICY AND PROCEDURE

It is the policy of HBW Leads, LLC (“Firm”) to fully comply with all applicable Do Not Call (“DNC”) laws and regulations regarding wired and wireless telephone communications (whether by live, artificial or prerecorded voice, telephone facsimile machine, computer or otherwise) to any covered telephone line or number. In a good faith effort to so comply and to provide consumers with an opportunity to exercise their DNC rights, the Firm hereby establishes, and will implement, the following procedures:

- (1) No representative of the Firm shall initiate any telephone solicitation, as defined by law, to any residential telephone subscriber before the hour of 8:00 a.m. or after 9:00 p.m. (local time at the called party’s location).

- (2) HBW Leads LLC abides by the guidelines set out by the National Federal Trade Commission and Local State Guidelines. All Do Not Call numbers will be removed from HBW Leads calling ad infinitum. Following are the ways that numbers can be put on HBW Leads DNC List.
 - a. National and State DNC list are updated every 31 days. These numbers are removed from the active calling and put on the Master DNC List.
 - b. If someone wants to put their numbers on the DNC, their numbers will be automatically put into the Master DNC List. This is updated every 20 minutes.
 - c. If we get communication after point of contact by someone wanting to put their number on our DNC list, this will be manually put in the master DNC List and there will not be any contact made after this point. This is updated instantaneous.

In addition our DNC regulatory compliance is verified by an independent third party on a bi-monthly basis.

- (3) Prior to making any telephone solicitation, the Firm shall remove any and all telephone numbers listed on a newly obtained solicitation list which are also currently listed in the Master DNC list. The process is performed by an automated filtering process at the database level.

- (4) As an additional pre-caution, the Master DNC list is automatically synchronized between all dialing systems and databases at an interval of every 3 hours. The electronic synchronization will remove all newly added or synchronized telephone numbers from all dialing systems and solicitation lists.

- (5) Exceptions to procedures (3) and (4) include:
 - (a) if the Firm has the subscriber’s prior express permission, evidenced by a signed written agreement which states that the consumer agrees to the contact by the Firm and includes the telephone number to which the call may be placed,

- (b) the company representative making the call has a personal relationship with the recipient of the call (a personal relationship means that the person called is personally known to the caller), or
- (c) the Firm has an “established business relationship,” as defined by law, which is such to create an expectation on the part of the consumer that a particular company will call them. An established business relationship with one company may extend to an affiliate of that company if the consumer would reasonably expect the affiliate to be included as part of the relationship (an example would be for customer service or billing concerns).