



## Do Not Call Policy

**Approved by the Board of Directors  
September 26, 2017**

## **Do Not Call Policy**

### **Corporate Statement**

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The Bank respects the privacy of all consumers, both current and prospective customers, be it a business or personal relationship that they have with the Bank. In support of this commitment and pursuant to regulations set forth by the Federal Communications Commission (“FCC”) and other regulations set forth by the Telephone Consumer Protection Act (“TCPA”), the Bank’s Board of Directors has adopted the following policy. As such, this policy pertains to all advertising and/or promotional activities intended to promote our brand, products, or services through direct mail, telephone solicitation (including mobile phones), or email campaigns. In addition to this policy being posted on our website, upon request, the Bank will provide customers and prospects with a copy of this policy.

If an individual would prefer not to receive consumer-related direct marketing communications from the Bank, simply request that the individual’s name be placed on the Bank’s Do Not Call List, Do Not Mail List and/or Do Not Email List. In compliance with federal and state laws, we will document the request immediately. Please allow up to thirty (30) days after the individual has made their request, for their name to be removed from any sales/marketing programs currently underway.

An individual may be placed on the Bank’s Do Not Call, Do Not Mail List and/or Do Not Email List by doing one of the following:

1. Visit one of our branches
2. Call the Customer Service Center at 1-877-963-2100
3. Send a written request to:  
Envision Bank  
Attn: Do Not Call/Do Not Mail/Do Not E-mail Lists  
10 Cabot Place  
Stoughton, MA 02072

When an individual contacts us, they must be prepared to provide the following information:

- Name
- Address
- Telephone Number(s) (including area code)
- Email address

We will update the individual’s information within a reasonable period of time, not to exceed thirty (30) days as outlined in our Do Not Call Procedure. We will maintain the telephone number(s), address, name, email address on the Bank’s Do Not Call List, Do Not Mail List and/or Do Not Email List for five (5) years. If a person’s name, telephone number(s), email, and/or address changes, another request must be submitted to have the new number, email, and/or address added to the Bank’s Do Not Call List, Do Not Mail List and/or Do Not Email List. The institution shall retain records of its telemarketing activities for at least 25 months after each advertisement ceases to be used.

When we solicit consumers (via direct mail, telemarketing, or email), we honor “Do Not Call” requests on behalf of consumers listed on the National Do Not Call (NDNC) Registry maintained by the Federal Trade Commission and various state-agency lists, by running all marketing lists against the current (no more than 31 days old prior to being made) NDNC. DNC lists are maintained and lists are scrubbed against this list by our third-party Marketing partner. However, if an individual is a customer, we may still contact them for non-solicitation purposes. This would include things such as surveys, billing, regulatory notifications, and other service-related matters.

## **Envision Bank Do Not Call Policy**

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Any employee involved with telemarketing and/or telephone solicitation with the Bank is trained, informed, and directed to comply with the Bank's Do Not Call Policy and when calling, will never ask for sensitive information like an account number or social security number. For more detail, an individual may request in writing to the address above a copy of our specific internal Do Not Call procedures.

Pursuant specifically to the Telemarketing and Consumer Fraud Prevention Act of 1994, the institution shall not make unsolicited telephone calls in a way in which the reasonable consumer would consider coercive or abusive of their right to privacy nor will it make calls before 9:00am or after 9:00pm.

Pursuant to the Fax Prevention Act of 2005 the Bank does not currently utilize FAX advertising nor does it have plans to do so in the future. Furthermore, the Bank does not currently use auto-dialers nor does it have plans to do so in the future.

The Bank intends to comply with all federal and state do-not-call laws and regulations. If an individual has any questions regarding our Do Not Call Policy, please contact Customer Service at 1-877-963-2100 or visit any of our branches.

### **Response Process**

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In the event of a complaint that under regulatory guidelines would require a formal written response, the complaint will be forwarded to Risk Management and appropriate complaint response protocols followed.

### **Oversight**

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Oversight is managed by the business line, through the Operations CMS Process, reviewed monthly by Retail Compliance Operations staff, and results reviewed with the Compliance Committee.