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## Guardian TCPA Report

Prepared for Joes Lead Shack

### What is a lead?

A lead occurs when a consumer visits a website and fills out a form, entering their personal information. A lead can also happen when a consumer interacts with a call center representative and confirms or provides certain information which are documented by the call center. Companies utilize lead forms on their own websites or in their call centers to collect data from consumers who have interest in being contacted about their products and services. Companies also purchase "3rd party data leads", where 3rd party lead sellers collect a consumer's data through a lead form on their owned and operated websites or their call centers, which they then sell to companies as a sales lead: a potential customer who has indicated interest in the company's products or services. In some cases, the 3rd party lead seller may collect a consumer's data, sell it to another 3rd party entity (known as an aggregator), who then sells that data to companies as a sales lead.

### Who is Jornaya?

Jornaya provides a neutral, 3rd party technology-based platform that tracks the origin and history of a lead event and the consumer actions that occurred at that event. Jornaya's technology witnesses more than one hundred million lead events each month - tracking the actions that occur when a consumer fills out a lead form - or interacts with a call center representative to complete a lead form.

Jornaya's Guardian services document the specific disclosure that was present on a lead form during a lead event and what type of consent was obtained, if any. Guardian services are intended solely and exclusively to provide companies with factual information about the environment that the consumer experienced.

Companies that purchase 3rd party data leads, or generate their own data leads on their website forms or in their call centers, use Guardian services to provide neutral verification and assurance that the activities regarding the collection of the consumer's consent to be contacted meet their requirements. Guardian services do not capture and store personally identifiable consumer data and Jornaya does not buy or sell leads; we help to verify what happened at the lead event.

### How does Jornaya help keep companies TCPA Compliant?

As a neutral, 3rd party witness to the events that take place on the website or a call center. Guardian provides facts on what happened during a consumer's visit to the website or interaction with a call center representative. Guardian helps companies to verify:

- Was a TCPA disclosure displayed or provided to the consumer?
- If so, did the disclosure meet the company's visibility and verification requirements? Was it large enough, and with enough color contrast? Or was it hidden and obscured, not meeting the company's requirements? If a call center, was it clearly stated by the call center representative?
- Did the disclosure language match the company's compliance standards?
- Did the consumer consent to the TCPA disclosure that was displayed or provided?

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Lead Event Information:	
Universal LeadID	9FE55DBA-06C0-D1A8-2870-01177C067759
Event Date	08/30/2021
Event Time	11:12:12 AM EDT
IP Address	131.106.55.59

Disclosure Information:	
Query Date	08/30/2021
Query Time	11:16:36 AM EDT
Labeled TCPA Disclosure Statement captured at the lead event:	<p>BY CHECKING THIS BOX, I CONSENT TO RECEIVE PHONE CALLS AND/OR TEXT MESSAGES ABOUT SERVICES FROM PARTNERS OF JOE'S LEAD SHACK AT THE PHONE NUMBER PROVIDED, INCLUDING A WIRELESS NUMBER, USING AUTOMATED TECHNOLOGY. SUBMITTING THIS FORM IS REQUIRED FOR JOE'S LEAD SHACK PARTNERS TO CONTACT ME, WITHOUT OBLIGATION TO ENGAGE WITH THEIR BRAND.</p>

Contributed Data	Data Provided by the Jornaya Client ("Contributed Data") for Verification	Verified by the Jornaya Service
First Name	john	Yes
Last Name	smith	Yes
Address 1	123 Boring St	Yes
Phone 1	1234567890	Yes
Email	jsmith@test.com	Yes
City	King of Prussia	Yes
Zip	19406	Yes

This table is a summary of the fields and associated values provided by a Jornaya client for verification by Guardian. Guardian captures data associated with the interactions the consumer took with each listed field and if applicable, the data the consumer entered into those fields, and encrypts the captured data entered by the consumer using a secure one-way hashing methodology. When a client purchases a lead from a lead seller with a unique Universal LeadID associated with that lead, and proactively provides certain data associated with the lead ("Contributed Data") for which verification is requested, Guardian is able to verify if that Contributed Data matched to the encrypted, hashed value of the data that Guardian captured from the original lead event. This provides a client with verification that certain Contributed Data values were entered by the consumer at the original lead event. Data can be verified in the following ways: a match to data entered in form fields, a match to a pre-populated value, and/or a match observed in the parameters of the URL.

**Visual Playback Link:**

<https://vp.leadid.com/playback/9FE55DBA-06C0-D1A8-2870-01177C067759/1630336596.7248?key=163033633087>