



annexweb.com
Great Content,
Better People

CASL (Canadian Anti-Spam Legislation)

We're not just CASL compliant.

We're certified.

Not only do we have the precise, targeted prospects for your company, we also have the strictest and greatest CASL compliance measures you can find!

Did you know *Annex* is the only media list provider that has AAM CASL Certification?

We are so confident in our compliance, that we submitted ourselves to a third-party audit to both evaluate and certify our compliance.

Don't risk CASL non-compliance! Work with *Annex* for all your targeting email and digital needs.





EMAIL ACQUISITION

Annex receives reader's emails in a variety of ways. Most often these emails are provided directly to us by the email owner when requesting our products. In some cases, emails are found in the public domain within highly targeted, specific industries suitable for our publication(s). All forms of email acquisition are pre-vetted and some form of CASL consent must be established before our system will allow the emails to be accessed or used in any way. No emails are ever harvested, scraped or derived based on algorithms of patterns.

IDENTIFICATION REQUIREMENTS

All emails sent by Annex must have full identification of who we are and how to contact us. If we are sending a message on behalf of a client, we must also disclose the client's information as well. All outgoing CEM's must contain the following to be CASL compliant:

- The identity of the sender(s)
- A mailing address and at least two points of communication phone number, email or web address
- The identity of all third parties and third party info

To ensure compliance and to minimize risk, Annex uses prescribed, templated headers and footers to ensure all required identification parameters are met.

CASL CONSENT ASSESSMENT AND MANAGEMENT

In order for an email to be available, and before a CEM (Commercial Electronic Message) can be sent, there must be at least one form of CASL consent. Annex relies on two types of CASL Consent:

Express Consent as prescribed by the CRTC guidelines. Annex does send regular requests to our audience asking for their express consent.

Implied Consent as described under the B2B exemptions of the legislation. There are three types of implied consent that Annex uses within this exemption.

- **Disclosure*** - The email is given to us, for example, when people fill out our subscription form or give us their business card or address
- **Existing Business Relationship*** - The person has made a transaction, or a written contract for the purchase or barter of subscriptions or advertisements
- **Conspicuous Publication*** - The information is published in plain sight, for example, on a website or in a trade magazine

* When using implied consent to send messages, these emails must be relevant and related to their work.

* Implied consent has a 2 year expiry from the transaction date, or from the subscription expiry.





UNSUBSCRIBES AND UNSUBSCRIBE MANAGEMENT

Every email Annex sends must have a working unsubscribe mechanism. We allow every recipient the ability to easily unsubscribe (within 2 clicks) from the CEM just received. Unsubscribe links remain active for at least 60 days and are processed real-time, and emails are removed from future deployments well within 10 business days of the unsubscribe request. We also allow recipients the ability to easily and readily unsubscribe from ALL or ANY of our email products with the use of our sophisticated email subscription preference center.

The unsubscribe links are in the required and prescribed footer of every email deployed. Every deployment's unsubscribe link is tested and must be officially approved prior to deployment to minimize risk and ensure working unsubscribes.

Links to CASL Policies and Privacy Policies though not required for compliance, are Annex corporate standards and present on each email footer.

Annex manages all CASL compliance requirements as per the CRTC (Canadian Radio-Television and Telecommunications Commission) Corporate CASL Compliance Guidelines - Bulletin CRTC 2014-326

SENIOR MANAGEMENT INVOLVEMENT

At Annex, the ownership of CASL compliance requirements comes from the top level of management. As a result, Annex has empowered their staff with both finances and resources to ensure compliance. Annex has also assigned a CASL Compliance Officer and CASL Stewards.

RISK ASSESSMENT

Risk assessment is ongoing at Annex. All emails deployed for our clients go through a rigorous approval process and all CASL requirements are checked (consent, identification requirements, working unsubscribe links etc). All CASL system/process changes are managed directly through our compliance officer and fully tested prior to launch. Furthermore, Annex undergoes a complete, third party CASL Compliance audit every two-three years ensuring risk remains minimal.

WRITTEN CORPORATE COMPLIANCE POLICY

Along with written and validated CASL audit documents, Annex maintains official written corporate CASL compliance policies. These include CASL overviews, email acquisition and email use flow charts, preference/unsubscribe documentation, internal compliance procedures, CASL training needs, record keeping, complaint management etc.





SYSTEMS AND RECORD KEEPING

As of July 2014, Annex fully updated its systems to ensure all CASL compliance measures are met. The Annex consolidated database system allows for the capture of consent, consent expiry as well as unsubscribe preferences. All data elements (source of email, date stamps, consent type, consent expiry etc) required for tracking the source of the email and the appropriate consent are in place. Furthermore, our system has been developed to ensure filters for non-consent emails, expired consent and unsubscribes are automated, eliminating the risk of human error when selecting/retrieving lists.

TRAINING PROGRAM

Staff is continuously trained at Annex. Our CASL Compliance Officer has at least 2-4 live sessions for internal staff each year. All new employees are briefed in CASL as part of their onboarding requirements and all staff are provided with CASL101 overview documentation, CASL FAQs and CASL Do's and Don'ts documents. Furthermore Annex also has on demand webinar session and videos for staff training.

AUDITING AND MONITORING

Annex has full monitoring programs in place. This helps to detect and prevent any misconduct within the organization. Processing are in effect to ensure emails are sent within full compliance, and an approval process is in place for each deployment sent by Annex. A full audit of CASL compliance is also performed through a third party audit bureau (AAM).

COMPLAINT-HANDLING SYSTEM

Compliance complaints are managed in an official capacity which involves our CASL Compliance Officer. All complaints are tracked and addressed. If a complaint results in a required system, process or training change, the change requests are managed and overseen by the CASL Compliance Officer.

CORRECTIVE (DISCIPLINARY) ACTION

If an Annex employee has been found in contravention of compliance, a full assessment by the CASL Compliance Officer would be required on possible lack of training, system

