



ACQUIRE INTERACTIVE

Acquire Interactive Partner Compliance Questionnaire

Acquire Interactive, LLC (“Acquire Interactive”) is providing this compliance questionnaire to you as part of its due diligence and onboarding process for new partners. Please have a representative of your company, who has knowledge of your company’s operations and risk management, complete this questionnaire and include copies of the requested documentation. If a question is not applicable to you, please indicate with “N/A.” Once the questionnaire is completed, please have a senior executive confirm the accuracy of the information provided by signing the questionnaire. You may return a copy of the complete signed questionnaire via email to compliance@acquireinteractive.com. Should you have any questions or require clarification, please submit to the same address and our compliance team will reach out to assist you.

A. General Information:

- (1) Company Name:
- (2) Company President or CEO Name:
- (3) Person responsible for Compliance:
- (4) Title of person responsible for Compliance:
- (5) Email Address of person responsible for Compliance:
- (6) Telephone Number of person responsible for Compliance:
- (7) Have there been any changes in your organizational structure (i.e. senior management or major acquisitions/mergers) in the past year? Yes No If “Yes,” please explain:
- (8) Please list all trade associations of which you are currently a member.

B. Compliance Program / Legal Matters:

- (1) Does your company have documented compliance policies and procedures to ensure compliance with applicable legal and regulatory requirements pertaining to the services provided to Acquire Interactive or its customers? Yes No If Yes, please attach a copy of your policy and procedures. If No, please indicate how the company assesses compliance with applicable legal and regulatory requirements.
- (2) Has your company established internal controls to monitor and ensure compliance with its compliance policies and procedures? Yes No If No, please indicate how the company monitors and ensures compliance with its compliance policies and procedures.
- (2) Does your company perform formal compliance audits, or have a process to assess ongoing compliance with its compliance policies and procedures, including review of internal controls pertaining to regulatory compliance? Yes No If Yes, please indicate frequency of such audits/assessments and the results of such testing. If No, please indicate how the company assesses compliance with policies and regulatory requirements.
- (4) Does your company communicate compliance deficiencies to management and take prompt action to resolve identified compliance deficiencies? Yes No
- (5) Has an external examination of your compliance program been conducted in the past three years that addressed the services provided to Acquire Interactive and its customers? Yes No If Yes, please attach a copy of those audits/examinations unless this is prohibited by law or regulations. Please also indicate whether the deficiencies identified in those reports have been resolved or remain outstanding.
- (6) Have you been subject to governmental examinations of your compliance program in the past three years? Yes No If Yes, have those examinations resulted in enforcement actions against your company? Yes No Please explain.
- (7) Regardless of the source of identification, are there unresolved compliance matters pertaining to services provided to Acquire Interactive and its customers? Yes No If Yes, please explain.

- (8) Has your company been named as a defendant in a suit alleging fraud, deception, unfair or deceptive practices or similar actions? Yes No If Yes, please explain.
- (9) Has any member of senior management or director been named as a defendant in a suit alleging fraud, deception, unfair or deceptive practices or similar actions? Yes No If Yes, please explain.
- (10) Do you have a process to receive, track, investigate and resolve customer complaints in a timely manner? Yes No If Yes, please indicate if you have received any complaints in the past year on services provided to Acquire Interactive customers and how they were resolved.
- (11) Does the company currently follow Online Lenders Alliance (OLA) best practices? ****If your company does not have a copy of the best practices, one can be provided.*** Yes No If Yes, who monitors the processes and how is it monitored? If you do not follow OLA best practices, what other trade organization best practices do you follow?
- (12) As applicable, do you have up-to-date licenses required by any governmental entity for the services provided to Acquire Interactive or its customers? Yes No If No, please explain.

C. Disclosures

- (1) How does the company maintain consumer privacy? Please provide a copy of your policy and procedure for maintaining consumer privacy.
- (2) Does the company disclose the third-party relationship to the consumer and if so, how? What information is included in this disclosure? How often is this disclosure provided?
- (3) Does the company store consumer data? Yes No If so, what data is stored?
- (4) Are there written policies and procedures for data storage and protection, including but not limited to safeguarding sensitive/personal consumer data? Yes No If so, please provide a copy of those policies.
- (5) What type of storage process is used (cloud server, etc.)? Is wireless networking utilized? Yes No What are the policies and procedures for consumer data disposal?

D. Operations

- (1) Are background checks conducted and all potential personnel properly screened prior to being hired? Yes No
- (2) Do employees receive regulatory and compliance training on a periodic basis? Yes No
If Yes, what is the process? How often is the training provided? Are employees required to pass a test? Yes No If so, what is the structure of the test(s)? Please attach a schedule of trainings with respect to the services offered to Acquire Interactive customers. If No, please indicate how the company assesses compliance with policies and regulatory requirements.
- (3) Do your employees receive training on Unfair, Deceptive or Abusive Acts or Practices (UDAAP) on a periodic basis? Yes No If No, please indicate how the company assesses compliance with UDAAP.
- (4) Are employees trained on the applicable laws affecting the financial services industry? Yes No
- (5) Does the company offer an incentive compensation program to staff based on sales or contract performance? Yes No Are incentives offered based on leads sold or revenue? Yes No Are the incentive compensation program(s) associated with any services offered as part of the contract with your company (for example, bonuses or incentives provided to sales staff if your company purchases a specified amount of leads)? Yes No

E. Third Parties

- (1) Are third-party vendors used as part of the agreement with your company and Acquire Interactive? Yes No N/A If yes, in what capacity are third-party vendors used? If no, please mark 'N/A' and proceed to the next section.
- (2) Does the company have written policies related to vendor management and third-party risk? Yes No If yes, please provide a copy of the policy/procedure. If no, how does the company evaluate and manage third-party risk?
- (3) Does the company monitor its third-party vendors after the contract is in place? Yes No If no, please explain:
- (4) Does the company evaluate the third-party vendor's operational and compliance policies and procedures? Yes No Are these policies and procedures documented? Yes No

- (5) Does the company evaluate the third-party vendor's policies and procedures regarding data storage? Yes No
Is this documented? Yes No Has the process been audited? Yes No

Additional Notes (as needed):

Depending on the answer you provide above, we may request additional materials from you. Additionally, by signing below, you also attest that the information provided in this Compliance Questionnaire is true and accurate as of the date of this Compliance Questionnaire. You further attest that any event that would materially change any response to the questions within shall be reported to Acquire Interactive within five (5) business days of your knowledge of such event.

Review Completed by: _____

[Signature]

[Name, Title]

[Date]

[Company]