



BASED ON
OLA
UDAAP
FTC
CFPB

Website Compliance Guide

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Stop Go Networks Ltd.
stopgonetworks.com

01 Overview

As a Stop Go Networks affiliate, you need to follow the practices outlined in this document. Your website needs to be transparent, clear, and understandable, and avoid any potentially misleading wording.

This Guide was created to help guide our affiliates with up to date **compliance requirements**. The checklist will help keep your websites & other marketing materials compliant. Our checklist was composed using OLA, UDAAP, FTC and CFPB guidelines.

One of the most important guidelines is the **Unfair, Deceptive, or Abusive Acts or Practices** to consumers (called UDAAP). This means publishers misrepresenting themselves as lenders or brokers, or misrepresenting the lead distribution model as a service that assesses the best/right lender for that particular consumer are violating UDAAP. This can lead to **hefty fines** for publishers, lead aggregators and lenders.



ARE YOU COMPLIANT?

Be transparent, clear and avoid misleading messages.

02 How to be compliant

There are two separate elements of compliance: required information that you need to display on your website, and avoiding the usage of prohibited terms and phrases. Both serve the aim to inform consumers accurately. Follow our checklists below to make sure you're in the clear.



03 Required Information



01

PRIVACY POLICY

Every website must display a “Privacy Policy” on every page of your site. We suggest displaying it in the footer of your site. The Privacy Policy must explain what information is collected, how it is used, who it is shared with and how it is protected. Consumers must be allowed to opt-out of sharing their information.

02

TERMS AND CONDITIONS (T&C)/TERMS OF USE (TOU)

Every website must display a T&C/TOU on the home page. The TOU is an agreement between you and the consumer. It should describe your service and explain what happens when they submit info through your website.



TCPA & MARKETING CONSENT LANGUAGE

You must have the consent text appear above the submit button, not beneath. Example: “By clicking [this button] I give my written consent to receive SMS/text messages and autodialed or prerecorded calls from you and your marketing partners at the telephone number I provided. I understand my consent is not a condition of obtaining a loan.” If you implement our **Embedded Form**, this box is ticked for you already.

04

NOT A LENDER DISCLAIMER

You MUST make it clear that you are NOT a lender. Example: “The operator of this site is not a lender or loan broker, and doesn't make lending decisions on behalf of lenders. We do not make cash advances or credit decisions. Advertising on or through this website does not constitute an offer or solicitation to lend money to you. This site will submit the information you provide to a lender who offer loans to borrowers who meet its lending criteria.”

05

CONSENT FOR ELECTRONIC DISCLOSURES (E-CONSENT)

Every website must capture consent for Electronic Disclosures.

04 Prohibited terms



01

SUPERLATIVES: BEST/RIGHT/ MOST/ LOWEST; MATCHING

This language is not allowed because it implies that the borrower's situation is assessed and used to match them with the right lender. The ping tree does not work that way.



We find you the **best** lender.
We search for the **lowest** rates.
We **match** you with the lender based on your circumstances.
Get **matched** to the **best** lender with the **best** rates.



We aim to connect you with a lender in our network.
We help you connect with a lender.
We aim to connect you with one of the several lenders in our network.

02

TIME (DAYS/MINUTES/HOURS) THAT YOU CAN'T GUARANTEE

Any references to TIME (DAYS/MINUTES/HOURS) must be phrased in such a way that it's not a guarantee or promise.



Get approved **immediately** (or in **5 minutes**)
You will receive your funds the **same day**



You may be approved in **as fast as** 5 minutes
Some lenders **can** fund your loan **as soon as** the next business day

03

100% SECURE

You are liable for any promises made on your site, so stay away from overpromising. The Federal Bureau of Investigation and cybersecurity experts agree that 100% data security is practically impossible.



100% Secure



Your information is safe and secure.
We use industry leading security to protect your information.

04

FLEXIBLE PAYMENT OPTIONS

Mentioning flexible payment terms is a UDAAP violation because most lenders do not provide "flexible payment options," so using this phrase would be a misrepresentation.



Flexible payment option
Payment terms to fit your situation



[No alternatives]

05

PRESCREENED, PREQUALIFIED OR PREAPPROVED

You are not the lender, you're not allowed to advertise loans as "PRESCREENED", "PREQUALIFIED" or "PREAPPROVED."



You have been preselected [or prescreened] to get this offer
You are prequalified...



[No alternatives]

06

NO CREDIT CHECK

Remove any mention of No Credit Checks, even if they have an Asterisk* with disclaimers in the footer, most lenders will pull some sort of credit.



Search for a **no credit check** loan
No Credit Check



[No alternatives]

07

YOU ARE NOT THE LENDER; APPLY & APPLICATION

You are not a lender. Anything that suggests you lend, determine payments, approve or fund a loan is a UDAAP* violation. Apply and Application are terms only allowed for licensed direct lenders.



We will approve your loan
We will fund your loan
Apply now
Submit you **application** today



Your lender will approve your loan
Your lender will fund your loan
Get started now
Submit your details today



GOT QUESTIONS?

Get in touch with your
account manager today.

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