



Unsubscribe Process

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INTRODUCTION

LeadFlash maintains the policies and procedures described in this document to help ensure that its affiliates execute successful online marketing initiatives in compliance with the opt-out and other requirements of the CAN-SPAM Act and other applicable laws. In some instances, LeadFlash's policies may be more restrictive than the requirements of the CAN-SPAM Act.

Although this Policy provides an overview of CAN-SPAM requirements, it is not a substitute for legal advice that each affiliate should obtain through legal counsel.

Definitions:

As used in this Policy, the following terms shall have these meanings:

“Affiliate”: The person or entity procured by LeadFlash to initiate the transmission of a commercial email message that advertises or promotes the product, services, or Internet web site of a sender.

“Clear and Conspicuous”: Refers to a disclosure that is unavoidable, of a size and shade sufficient for the ordinary consumer to read and comprehend, and in understandable language and syntax.

“Opt-out request”: A request from the recipient of a commercial email message to unsubscribe from receiving further commercial email messages from the sender.

“Sender”: The person or entity whose products, services, or Internet web site are promoted in the email message.

“Suppression List”: List of email addresses of individuals who have made an opt-out request. Suppression lists are campaign-specific.

Requirements for commercial e-mail:

Consistent with the CAN-SPAM Act, LeadFlash requires that all affiliates comply with the following requirements:

- Each message must include “header” information that is not false or misleading. “Header” information includes the source, destination, and routing information attached to the email message, including the originating domain name and originating email address, and any other information that appears in the “from” line.
- Each message must include a “subject” line that does not include false or misleading information. If the subject line relates to the message’s content, then it is unlikely to be viewed as false or misleading.
- Each message must have a "clear and conspicuous" notice of the recipient’s opportunity to decline to receive further commercial email messages from the sender.
- Each message must contain a functioning return e-mail address or a clearly and conspicuously displayed link that allows the recipient make an opt-out request. The return email address or opt-out link must be capable of receiving opt-out requests for at least 30 days after the transmission of the original message.
- Affiliates may not send subsequent messages advertising the sender’s products, services, or web site more than 10 business days after the recipient makes an opt-out request. Affiliates are required to use and maintain the appropriate suppression file for each campaign. If the recipient makes an opt-out request, affiliates may not request, sell, lease, exchange or otherwise transfer or release the e-mail address of the recipient, except for opt-out compliance purposes as further specified herein.

- Each message must include a valid physical postal address for the sender. **[NOTE: Based on new FTC rules, a “valid physical postal address” can include a validly registered P.O. Box or private mailbox.]**
- Each message must include clear and conspicuous identification that the message is an advertisement or solicitation.

LeadFlash procedures for commercial e-mail:

A. Test Emails

- Affiliates are required to send a test e-mail to LeadFlash before any message is sent to recipients. Test e-mails will be reviewed by and approved by LeadFlash before email campaign is dropped. Test email ensures approved materials are used, and that unsubscribe mechanisms and affiliate tracking links are operational. Affiliates should send test email(s) to info@leadflashmail.com. LeadFlash will notify the affiliate [within what time frame] [via what means, e.g., email?] that the test email is approved for distribution to recipients.

B. Subject Lines

- Each message must contain an approved subject line as provided by LeadFlash that will clearly and conspicuously represent the subject matter of the message. LeadFlash Approved Subject lines:
 - *Cash Quick? Get up to 1500 Now*
 - *Up to 1500 in 1 hour- Fast Approval*
 - *Bad Credit OK - Up to 1500*
 - *Financial relief is a click away!*
 - *Up to 1500 USD in 1 hour*
 - *Get the funds you need in 1 hour*
 - *Payday too far- Get up to 1500 Now!*
 - *Get up to 1500 USD – Bad Credit OK*
 - *Need Cash Now - Get a Cash Advance*
 - *Up to 1500 in your account now*

C. “From” Lines

- Affiliates will insert a “from” line for each message that is the actual, valid business name the affiliate or one of its actual brands or business divisions. Vanity “from” lines and aliases (e.g., Special Offers, Great Deals) are strictly prohibited.

D. Email Creatives and the LeadFlash Interface

- Affiliates will use an email creative supplied by LeadFlash and accessible via the LeadFlash Interface. [Click here](#) for a preview of a LeadFlash Email Creative.
- Affiliates that select an Email Creative from the LeadFlash Interface will receive the following type of email with deployment information and instructions:

Campaign	EmpirePaydayAdvance
Unsubscribe Link	http://www.empirepaydayadvance.com/asyouwere.aspx
Description	NEW OFFER! EmpirePaydayAdvance. The fastest cash advances on the internet! \$30.00 on each valid submitted application. Available Email, Text and HTML creative. US Traffic only.
Important	Due to spam-filters we recommend you add info@leadflashmail.com to your address book to guarantee receipt of our emails.

Approved Subject Lines

You *must* use one of these subject lines on the email

- Cash Quick? Get up to 1500 Now
- Up to 1500 in 1 hour- Fast Approval
- Financial relief is a click away!
- Up to 1500 USD in 1 hour
- Get the funds you need in 1 hour
- Payday too far- Get up to 1500 Now
- Get up to 1500 USD
- Need Cash Now - Get a Cash Advance
- Up to 1500 in your account now

This message is being sent by the publisher below. To be removed from their list, please see their instructions at the bottom. If you wish to no longer receive messages that promote EmpirePaydayAdvance, please CLICK HERE, or printout and forward this email to: EmpirePaydayAdvance,OptOut, 14545 N Military Trail, Box 359, Delray Beach FL 33484.

Images

Click each image to download it!

- [EPA_email_600x400-b.jpg](#)
- [message600.gif](#)

There is a tracking pixel embedded in the HTML

HTML Creative Source Code. (Copy and paste the code to use)

PLEASE NOTE! You must replace "#YOUR-FILE-LOCATION#" with your web server's image path!

```
<!DOCTYPE html PUBLIC "-//W3C//DTD XHTML 1.0 Transitional//EN"
"http://www.w3.org/TR/xhtml1/DTD/xhtml1-transitional.dtd"><html
xmlns="http://www.w3.org/1999/xhtml"><head><meta http-equiv="Content-Type"
content="text/html; charset=utf-8"
/><title>EmpirePaydayAdvance</title></head><body table width="600" border="0"
cellspacing="0" cellpadding="0" align="center">
<tr><td align="center"><a href="http://www.empirepaydayadvance.com/?LF=a4d9d2fa-6d1c-dd11-820c-00145e7aa2f0&aid=CD1"></a></td></tr><tr><td align="center"><a href="http://www.empirepaydayadvance.com/asyouwere.aspx"></a></td></tr></table></body></html>
```

Unsubscribe Link Embedded on the Creative HTML

Sent at Server Time 5/8/2008 10:55:34 AM

E. Opt-Out Notices and Links

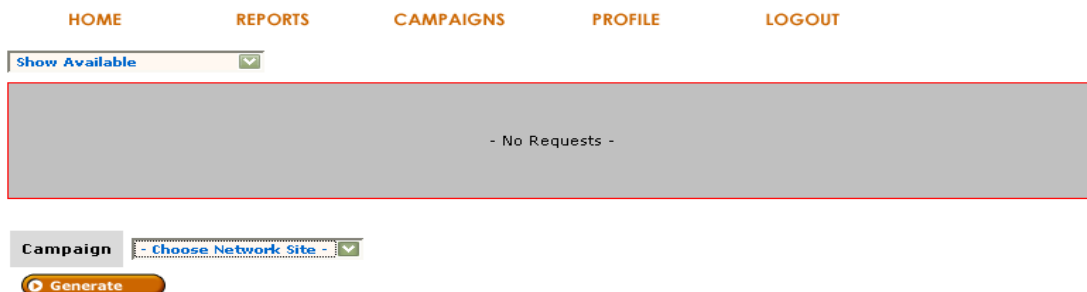
- LeadFlash requires that two opt-out notices must be included in each message: one to be applied to the affiliate’s suppression list and the other to the sender’s suppression list (as maintained by LeadFlash).
- The email creative provided by LeadFlash will include language instructing the recipient on how to opt-out of receiving further commercial messages from the sender. This language will clarify the difference between using the LeadFlash-provided link to opt-out of receiving commercial messages from the sender and using the affiliate’s opt-out link to opt-out of receiving commercial messages from the affiliate.
- Separately, the affiliate must insert its opt-out notice at the bottom of the message, after the creative. Each affiliate opt-out notice must contain a functioning opt-out link or email address that allows the recipient to make an opt-out request with respect to the affiliate’s email marketing list. LeadFlash affiliates are responsible for collecting opt-out requests directed to the affiliate’s email marketing list.
- Opt-out links must **automatically** remove the recipient from the list to which the request is directed and remain operational for the duration of the campaign.
- If a recipient sends a written opt-out request to the affiliate’s or LeadFlash’s valid physical postal address, the affiliate or LeadFlash (as appropriate) must manually add the email address to its suppression list immediately upon receipt and in no event more than five (5) business days after receipt.

F. Suppression Lists

- Affiliates are prohibited from sending any campaign unless it first “scrubs” its email distribution list against the LeadFlash suppression list applicable to that campaign to remove email addresses that had previously opted not to receive commercial messages from the sender of the campaign. Affiliates are prohibited from using the suppression file for any other purpose.
- Affiliates must schedule delivery of a campaign within 24 hours of downloading and using the campaign suppression list.

Affiliate Interface to Suppression Lists

- All LeadFlash affiliates must access our “Suppression/Do-Not-Email List” Module, located under the “Campaigns” tab menu on the LeadFlash Interface. The below image displays the home page for this module, when there have been no suppression file deployments by the affiliate.



- First time users should choose the campaign name in order to access the suppression file for that campaign. LeadFlash will then send an email notification with a link to the suppression file to the email address associated with the affiliate's log-in account.
- LeadFlash maintains the history of all suppression file deployments under each affiliate's account. Affiliates that have previously downloaded a suppression file for any specific campaign will only need to download an update to that suppression file as required herein.
- Affiliates must download updated suppression files for existing campaigns on a weekly basis to ensure compliance with the CAN-SPAM requirement to honor all opt-out requests within ten (10) business days.

Show Available

Time of Request	Campaign	Start Date	End Date	Actions
Tuesday, May 06, 2008 12:23 PM	WeGiveCash	4/29/2008	5/5/2008	
Tuesday, May 06, 2008 12:23 PM	Pay-Advances	4/29/2008	5/5/2008	
Tuesday, May 06, 2008 12:23 PM	GoMoneyAdvance	4/29/2008	5/5/2008	
Tuesday, May 06, 2008 12:23 PM	AdvancePaydayPlus	4/29/2008	5/5/2008	
Tuesday, April 29, 2008 7:05 PM	WeGiveCash	4/22/2008	4/28/2008	
Tuesday, April 29, 2008 7:05 PM	Pay-Advances	4/22/2008	4/28/2008	

Create a new download request


Campaign

Start Date

End Date

- The following is a sample of a LeadFlash Suppression File notification, sent to an affiliate within minutes after the affiliate has requested a suppression file from the affiliate interface.

From: LeadFlash Website [mailto:info@leadflashmail.com]
Sent: Day, Month DD, YYYY Time
To: Affiliate
Subject: LeadFlash Suppression List Request Fulfilled



Your suppression list request has been filled

Date range: 1/1/2004 to 5/6/2008
 Campaign Name: PayDayAllDay

[Click here to download file now](#)

Sent at Server Time 5/6/2008 12:59:54 PM

LeadFlash 15340 Jog Rd, Ste 215, Delray Beach, FL 33446 - 561-499-3329

G. LeadFlash Interface

Managing a List: There are three (3) ways an end user's email address will be added to a campaign's suppression file.

1. **LeadFlash Opt-Out Link:** The email recipient makes an opt-out request using the opt-out link provided by LeadFlash. Such requests will be automatically added to the campaign's suppression list in real time.
2. **Manual Opt-Out:** The email recipient sends a written opt-out request to the address found on the footer of the email.
3. **Web-Site Opt-out:** The email recipient visits a landing page associated with a campaign and clicks the "[Unsubscribe](#)" link found on the right hand corner of the landing page.

Manual and Web-Site Opt-Outs: LeadFlash uploads opt-out requests received via written request or web site to the corresponding campaign's suppression list using the "Email – Suppression list Update."

- Manual removes from a return box are added to the corresponding file(s) within five (5) business days of receipt.
- Web site removes are added to the corresponding suppression file(s) within 24 Hours of receipt.

Managing Affiliates

- LeadFlash closely follows the legal requirements of the CAN-SPAM Act by adding e-mail addresses to applicable suppression lists within 10 business days of receiving an opt-out request.
- Every Monday, the Affiliate Administrator will review the suppression file history of each affiliate account profile with "Mass-Email" as a company type.
- Affiliates who do not download a suppression list at least weekly will be sent a reminder to do so in order to ensure the most recent version is used prior to a campaign being sent.
- Affiliates who do not download the list within the required 10 business day time period will again be notified and asked to update the list immediately.

Sample of Email Notification.

Dear Affiliate,

We continually strive to provide you with all the tools necessary to execute successful online marketing initiatives. This includes complying with the ever-changing legal landscape. It is our responsibility to make sure that every affiliate follows our protocol when promoting our campaigns via e-mail to ensure that they are protected legally.

Test Email

Our Quality Assurance Department would like to remind you that part of this protective protocol includes receiving a test e-mail from you before any materials are sent to an end user. Not only does this inform us that our approved materials are used, it lets both LeadFlash and you know that our unsubscribe link is operational and that your affiliate links are tracking correctly.

Please make sure to send test emails to the following address:
info@leadflashmail.com

Suppression Files

We'd also like to review the Can Spam law with regards to suppression lists. Our system closely follows the legal requirement by removing e-mail addresses within 10 business days of receiving an unsubscribe request. Affiliates who do not download a suppression list at least weekly will be sent a reminder to do so in order to help you make sure you have the most recent version. Affiliates who do not download the list within the required 10 business day time period will again be notified and asked to update the list immediately. Please make sure you comply with this policy in order to be certain your e-mail campaigns are never interrupted.

For more information about the Can-Spam law please visit:
<https://www.ftc.gov/bcp/online/pubs/buspubs/canspam.htm>

Thank you for your continued observance of these legal issues and for taking the necessary steps in order to ensure that both LeadFlash and you, as our affiliate, are always acting in accordance with the law.

We appreciate having you as part of our business, and look forward to continued success in 2008!

Warmest Regards,

Affiliate Services Department