



ANASOVA

# Compliance Discussion

Anasova.com

Effective as of September 2023

# Assessing Compliance and Regulatory Risk with Anasova

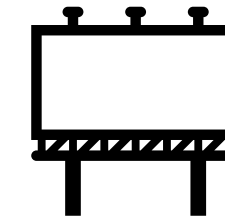
## 3 Categories



**Data**



**Content**



**Advertisements**



**We do not need personally identifiable, detailed or verified data to create compelling educational material.**

## Data we do NOT collect.

- Full name
- Maiden name
- Mother's maiden name
- Physical Address Home
- Physical Address Work
- Geolocation
- City / County
- Social security numbers
- Drivers License numbers
- Passport numbers
- Taxpayer ID
- Gender
- Date & Place of birth
- Race
- UserID & Password(s)
- Location of assets or liabilities / names of financial institutions
- Account numbers
- Credit card numbers
- Biometric records
- Educational information
- Employment information
- Health information
- Specific financial information
- Links to outside accounts
- Verified information
- Linkable information which could be used to indirectly identify
- No notes or comments for accidental PII



# Data We Do Collect



## What we do collect:

- First name (or nickname)
- Email address (optional)
- Phone number (optional, can be removed)



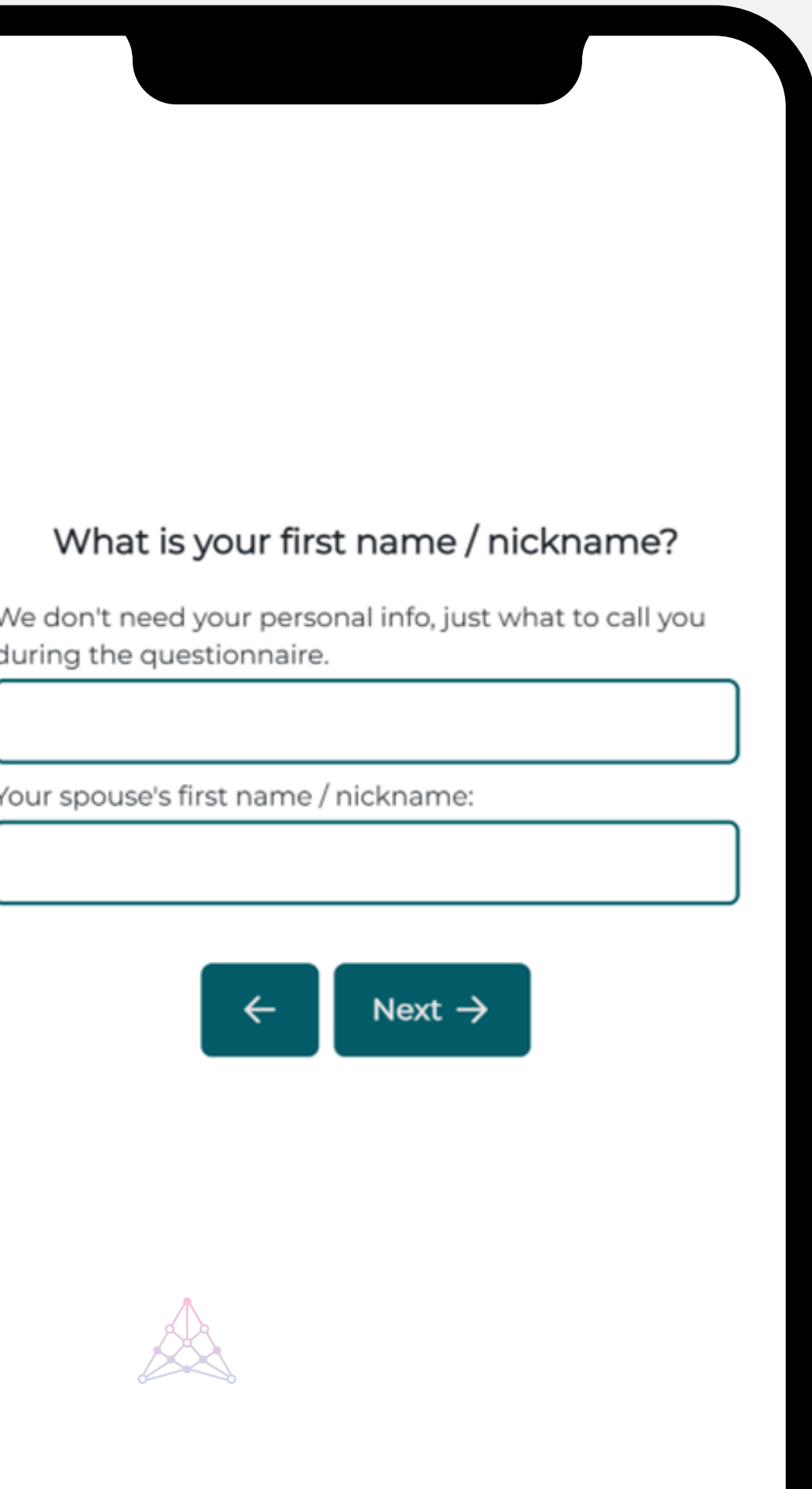
## Worse Case Scenario (unlikely):

- Full name + email + phone number  
(Maximum 10 characters on name)



## Risk Assessment:

- Cannot use to distinguish individual's identity directly or via linkable information
- Data unverified: user entered, typically rounded

A screenshot of a questionnaire form. The form has a white background with a black border. At the top, it asks "What is your first name / nickname?". Below this, there is a text input field. A note below the field says "We don't need your personal info, just what to call you during the questionnaire." Below the first field is another text input field labeled "Your spouse's first name / nickname:". At the bottom of the form, there are two buttons: a left arrow button and a "Next" button with a right arrow.

# Key Question Do you consider email and/or phone number PII?

**Our stance: It is not,  
especially as we do  
not collect names**

**However, we have 4  
options depending on  
your view.**



## **Include Emails & Phone Numbers**

Allow users to provide this contact information and you access them



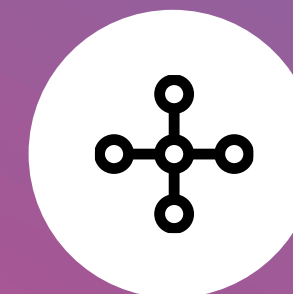
## **Include only Emails**

Allow users to provide only their email and you access them



## **Allow but not access**

Allow users to receive a copy of their plan via email but you do not receive their contact information



## **No contact information**

Only include your call-to-action page and generate leads from user action



## SOC 2

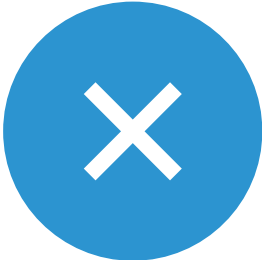
It is generally stated that organizations that need a SOC 2 report include cloud service providers, SaaS providers, and organizations that store customer information in the cloud.



**We do not have customer data. We provide a lead generation tool with no accounts, usernames, passwords or detailed data.**

**We do take privacy and security seriously. See [our privacy policy](#).**

# Potential Content Risks



Risk of error



Bad output or content



Regulatory  
(more details next page)



# Mitigation



Anasova is education partner. Not your content.



Anasova's content does not contain investment or securities advice.



Clear terms of use and disclosures. Content is education, only.

# Anasova is not a registered entity.

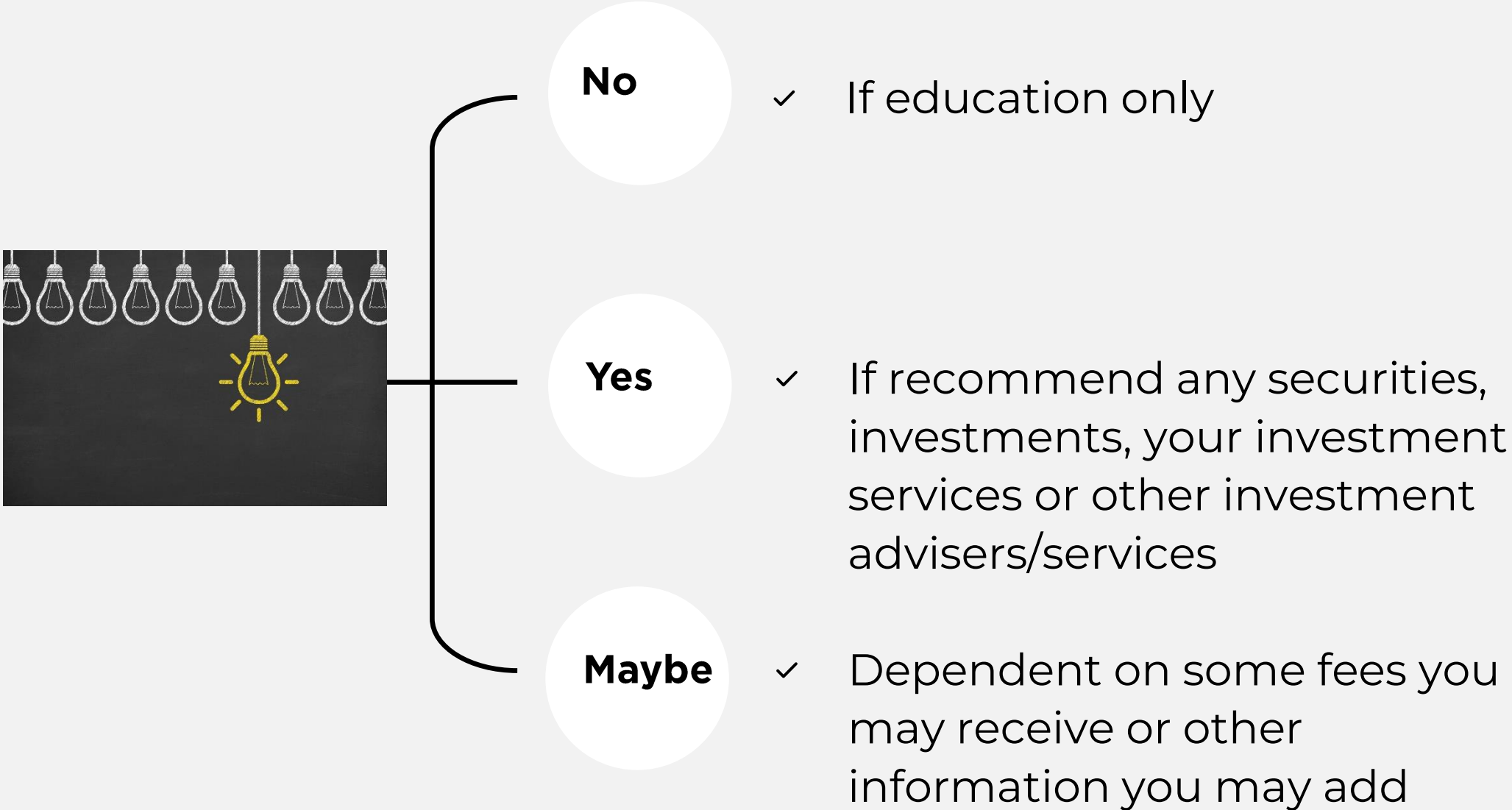
We are an education-only software service.

Our content is intended to promote conversations with registered entities or individuals who can provide deeper, personalized advice and specific, actionable recommendations.

We do not provide any investment or securities advice. We leave that to our clients.



## Do I need to be registered entity?



**Please see our CEO's letter and Regulatory and Compliance FAQ for more information.**



# Anasova works with you to comply with Books and Records and Recordkeeping Rules

1

## Every Email Sent

We will copy any address of your choice to all emails sent

2

## Every Plan Completed

You will have a copy of every plan run with audit trail of all user interactions

3

## Ongoing Diligence

Continue to partner to ensure meet rules as needs evolve



# Include your profile and calls-to-action to promote your services within the plans

**Risk: Very Low. You control these customizations; you control the risk.**



1

Our software and content do not contain any data that should implicate the New Marketing Rule, e.g., 3rd party ratings, endorsements or adviser-related performance data

2

When you add your information, you will need to ensure that it meets the applicable marketing and advertising rules in your industry.

- For example, the New Marketing Rule (namely, that it appropriately discloses any material information)

**Purchasing our leads is much like purchasing email leads or other lists, already commonplace in the industry**



## How is that so? Key facts:

- We do not provide advice of any type, including no investment, securities, tax, debt, or lending advice.
- The lead cost is not based on any type of success.
- Anasova does not match users to Clients.
- Anasova is never the solicitor.
- Anasova does not vet, endorse or make any other comment on the credentials, quality, or competence of Clients who purchase leads.
- Contact with leads cannot be made through Anasova's software or marketplace.

For more information, download our CEO Letter & Detailed Compliance FAQ



ANASOVA

Embrace the power of digital financial  
planning.

[anasova.com/compliance](https://anasova.com/compliance)