Genistar Social Media and Advertising Policy



GENISTAR
Financial Freedom For All

1) Advertising

The rules put forward by the **Financial Conduct Authority (FCA)** embrace all methods of communication between regulated businesses and their consumers.

A regulated financial promotion is any form of communication between a regulated firm and their consumer base. This includes all **written, oral and visual** correspondence used to spark the consumers' interest in entering into or **altering an FCA-related product.**

Genistar must also adhere to industry-wide standard advertising codes cited by the **Advertising Standards Authority (ASA)** and the **Committees of Advertising Practice (CAP).**

Complaints about advertising and financial promotions are normally forwarded to the local **Trading Standards** office first. These complaints may be directed to the FCA by the standards office and in some instances, to the regulated firm itself.

In regard to Consumer directed advertising and promotions, protection is granted by **The Consumer Protection from Unfair Trading Regulations**. Businesses must not mislead or hassle consumers by:

- Sending false or deceptive messages
- Leaving out important information
- Using aggressive sales techniques

If these regulations are broken, Genistar may be reported to a local Trading Standards office. The business and its directors may also face fines, prosecution or imprisonment. Any form of promotional or advertising material that you wish to release must always be signed off by the Genistar Field Support Centre's Compliance Team, prior to use.

2) What Counts as an Advertisment?

Any of the following:

- Posters
- Flyers
- Business Overview Invitations
- Newspaper/Magazine Advertisements
- Business Cards
- Stationary
- Any literature used at exhibitions or seminars, e.g., sales presentations, company brochures
- Dialogue
- Internal TV, radio or internet
- Websites, blogs and online communications (when produced by a Genistar representative)
- Telephone calls & solicitations

If you are unsure, ask your EVP. The tried and tested approach of expanding your business will be through personal introductions and the third-party referral system. These methods have proven to be effective and are fully compliant.

If you plan on releasing any form of advertising or promotion, check with your EVP and they will assist you. Where relevant, they will also support you in getting approval from the Compliance Team.

The Advertising Approval Procedure

- Submit the proposed advertisement to your EVP for review & approval.
- Your EVP will submit the advertisement to the Compliance Team for review.
- If considered appropriate, the Compliance Team will sign off on the advertisement - some changes may have to be made to ensure the piece is fully compliant.
- The Compliance Team will issue an approval code for the advertisement, include it in the logbook & inform the EVP and representative of approval.

You must NOT issue any kind of advertisement without a Compliance Approval Code, as this is a serious breach of regulation.

Genistar Business Cards

Having a Genistar Business Card is not required; however, it is a great option available to our representatives. Once you are considered competent as a Genistar Company Representative, you may have your own approved business card. In order to receive your business card, you must:

- Send the details you wish to appear on the card (name, mobile, email address) to media@genistar.net
- The Media Team will send you the template with the details provided.
- You will then be able to send the template to a local / online printers and order as required.

Electronic Communications: Email, Text Messaging and Websites

Genistar's successful field leaders have grown their businesses by recruiting through the "warm market" and providing customers with an in-person, individual service. As a company, we don't believe in the effectiveness of cold calling, flyering or the internet when sourcing recruits or as overall sales tools.

How does it feel when you receive a cold call or "spam" email? Do you ever respond to them positively? The most successful individuals in this business develop their warm markets and educate those they recruit to do the same.

Using email and text messaging is acceptable for:

- Confirming customer appointments
- Continuing communication with existing clients, team members and FSC members

Remeber: Data and Privacy rules are enforced for a reason, do not share sensitive information.

Using email and text messaging is not acceptable in the following circumstances:

- Giving advice
- Solicitation for recruitment purposes
- Soliciting new clients
- Discussing a customer's financial situation or goals
- Correspondence on products
- Detailing customer specific information
- Handling complaints
- Advertising or "spam"- inappropriate usage of email to target unknown people is **completely forbidden**. The Compliance team will take a hard stance against anyone found using spam for Genistar recruitment or business purposes.

A personal email address must not be used to discuss Genistar business matters with prospective recruits or clients. To minimise the risk of Data Privacy breaches, you must use your secure Genistar email account for all Genistar business correspondence. Under no circumstances may a Genistar representative use other means of electronic communication to provide images of business-related documentation (E.g., product quotes or imaged documents containing confidential, personal data).

Creating your own Genistar website is not allowed under any circumstances. All those interested can be directed to the official company website; https://genistar.co.uk

Additionally, social media pages/profiles must not contain any advertisement materials or exaggerated information about your relationship with Genistar. Labels such as "Owner" or "Recruitment Director" are not allowed; alternatively, use a title such as "Company Representative" or "Team Leader".

3) Social Media

Permitted for Everyone

All representatives can use social media for the following purposes:

- Display an honest account of their relationship with Genistar genistar
- Share materials posted on Genistar's official social medias, which have been pre-approved by the Compliance team
- Bring attention to the company's official website and social media pages
- Build relationships through developing an online network of contacts

Prohibited for Everyone

All representatives cannot use social media to do the following:

- Discuss or reference any mortgage content
- Discuss products or attempt to solicit business
- Disclose any personal information about Genistar clients or internal company information
- Make any claims about your earnings or lifestyle, or those of others (via text, images or in any other form)
- Display or receive recommendations or endorsements

Media

If you are contacted by the media, you are not permitted to discuss any business-related matters with them, unless given permission by a Genistar Director. If you are approached, please **forward the enquiry to your EVP** or the Compliance team and they will inform of you the best way to proceed.

Email: compliance@genistar.net
Phone: 02033725085
Address: Compliance Team, Genistar Limited, Victoria House, Harestone Valley Road, Caterham, CR3 6HY

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Authorised and Regulated by Financial Conduct Authority.