

Transactional vs. Relationship Communication

TRANSACTIONAL: Some communications (for example, appointment reminders or client-case manager direct communication) are considered transactional and are necessary for regular business practice. These communications will continue as long as clients receive services through ACTION PATHWAYS or its programs and can only be ended upon termination of ACTION PATHWAYS as a service-provider.

RELATIONSHIP: Email communications such as newsletters, announcements and information not critical to a client's relationship with ACTION PATHWAYS are considered relationship communication and are sent to recipients on an opt-in/ consent basis. All such communication is managed through an outside vendor to ensure we are in compliance with FTC regulations regarding anti-spam and privacy.

Prior consent and opt-in clause

ACTION PATHWAYS will always comply with CAN-SPAM and FTC regulations. <http://business.ftc.gov/documents/bus61-can-spam-act-compliance-guide-business>

Prior consent occurs when the email address/ contact information is initially given to ACTION PATHWAYS agent. We include a short statement at the point at which the user submits their email/ contact information to the effect that these may be used for marketing communications unless the user expressly requests that they are not.

Example of prior consent clause:

By providing your email address, you consent to receive email notifications and information on behalf of ACTION PATHWAYS. You may opt out of this email service at any time by contact us or following the opt-out instructions included in each email you receive.

The above consent statement is considered active consent by supplying the information. Another method to be properly employed is a "check box" or opt-out box.

Opt-out clause

In the print or electronic information collection form, an opt-out box may be used to indicate the individual DOES NOT want to receive communication on behalf of ACTION PATHWAYS or its agents.

Example of opt-out clause:

- I would like to receive email news and updates from ACTION PATHWAYS and its programs and services in addition to official business relating to my interaction with _program name_.*
- I would like to receive only emails that pertain to my official business with _program name_. (You will be placed on our do not mail list.)*

Another simple example (shorter):

I would like ACTION PATHWAYS to forward information about activities of the organization to my email address.

Yes No

Unsubscribe opportunities

We ensure that all marketing emails provide an easy and free means by which the user can opt-out of future marketing, and make sure that if they use this opt-out their request is adhered to in all future marketing. Once a user opts out of the email service, they cannot be added to the email database again unless the individual re-subscribed themselves. This protects us against potentially violating the do not mail and privacy regulations.

Each newly added email address receives a welcome letter with instructions regarding their opt-out opportunities. In addition, once each year, each individual receives an email specifically designed to offer them an opportunity to opt-out of the service.

Information sharing and contact information security

Under no circumstances does ACTION PATHWAYS share or rent contact information to third-parties. ACTION PATHWAYS uses Constant Contact, the most widely accepted mass email service to create and disseminate emails to contacts as well as manage our contacts list. This information is stored and secured through their complex SSL-encrypted system.

Constant Contact Accountability Statement: *We are a licensee of the TRUSTe Privacy Program. TRUSTe is an independent organization whose mission is to build users' trust and confidence in the Internet by promoting the use of fair information practices. Because we want to demonstrate our commitment to your privacy, we have agreed to disclose our information practices and have our privacy practices reviewed for compliance by TRUSTe.*