

CHECKLIST • 50 POINTS

# Vendor Due Diligence Questionnaire

*Assess any messaging vendor, agency, or platform before it sends texts or collects consent on your behalf.*

## USE IT TO

- Screen new vendors before signing
- Re-verify existing vendors every year
- Document your oversight if a message is ever challenged

|             |          |
|-------------|----------|
| Vendor      | Date     |
| Reviewed by | Services |

**How to score.** Mark each item Yes, No, or N/A and attach evidence where you can. Items tagged **CRITICAL** are deal-breakers: any "No" should stop onboarding until fixed. For the rest, more than five "No" answers means the vendor needs a written remediation plan before launch. Re-run this review annually and whenever the vendor's services change.

## 1. Company and registration

| # | Requirement                                                                                                                             | Yes                      | No                       | N/A                      | Evidence / notes |
|---|-----------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|------------------|
| 1 | Legal entity name, EIN, and address match what is registered with The Campaign Registry for the brands you send for.<br><b>CRITICAL</b> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 2 | You are (or use) a Campaign Service Provider connected to TCR, and can name it.                                                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 3 | Every campaign you run for us is registered under our brand, not a shared or reseller brand. <b>CRITICAL</b>                            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 4 | You can provide campaign IDs and the registered use case and sample messages for each campaign.                                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 5 | You have not had a campaign suspended or a brand rejected in the past 12 months (explain any).                                          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 6 | You use registered 10DLC, toll-free verified, or approved short-code numbers only. <b>CRITICAL</b>                                      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 7 | You disclose every subcontractor or platform that will handle our messages or consent data.                                             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |

## 2. Consent collection

| #  | Requirement                                                                                                                                         | Yes                      | No                       | N/A                      | Evidence / notes |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|------------------|
| 8  | Marketing consent is captured as prior express written consent that names our company. <b>CRITICAL</b>                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 9  | Consent language discloses frequency, "Msg & data rates may apply," HELP and STOP, and that consent is not a condition of purchase. <b>CRITICAL</b> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 10 | Checkboxes are unchecked by default; no consent is bundled with terms acceptance. <b>CRITICAL</b>                                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |

|    |                                                                                                       |                          |                          |                          |  |
|----|-------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|--|
| 11 | You do not buy, rent, or share lists, and do not rely on consent given to "partners." <b>CRITICAL</b> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| 12 | Keyword opt-ins send a compliant confirmation message immediately.                                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| 13 | Verbal consent is recorded or documented with the script used, date, time, and agent.                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| 14 | Each consent is tied to the specific phone number that consented. <b>CRITICAL</b>                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| 15 | You can show us the live web form or opt-in flow used for our program.                                | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |

### 3. Consent records

| #  | Requirement                                                                                                                      | Yes                      | No                       | N/A                      | Evidence / notes |
|----|----------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|------------------|
| 16 | You store date, time, source, exact language shown, and capture evidence (IP, recording, form) for each consent. <b>CRITICAL</b> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 17 | Records are retained at least five years after the last message. <b>CRITICAL</b>                                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 18 | You can export our consent records within five business days on request. <b>CRITICAL</b>                                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 19 | You record revocations with date, time, and channel.                                                                             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |

### 4. Opt-out and revocation

| #  | Requirement                                                                                                    | Yes                      | No                       | N/A                      | Evidence / notes |
|----|----------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|------------------|
| 20 | STOP, STOPALL, UNSUBSCRIBE, CANCEL, END, QUIT, REVOKE, and OPT OUT are honored automatically. <b>CRITICAL</b>  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 21 | Informal requests ("please stop," email, calls) are captured and honored. <b>CRITICAL</b>                      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 22 | Opt-outs are processed within 10 business days across all systems and campaigns they apply to. <b>CRITICAL</b> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 23 | A single confirmation is sent within 5 minutes and contains no marketing.                                      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 24 | Opt-outs you receive are passed to us within one business day.                                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 25 | HELP returns our company name and a support contact.                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |

## 5. Sending practices and content

| #  | Requirement                                                                                                                  | Yes                      | No                       | N/A                      | Evidence / notes |
|----|------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|------------------|
| 26 | Marketing messages are sent only 8 a.m. to 9 p.m. recipient local time, with stricter state windows applied. <b>CRITICAL</b> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 27 | You scrub against the National DNC Registry (at least every 31 days) and our internal list. <b>CRITICAL</b>                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 28 | Messages identify our company by name. <b>CRITICAL</b>                                                                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 29 | Content matches the registered use case; you do not add promotions to informational campaigns. <b>CRITICAL</b>               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 30 | You avoid public URL shorteners and use branded links.                                                                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 31 | You do not send SHAFT content without approval and age gating. <b>CRITICAL</b>                                               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 32 | Frequency never exceeds what was disclosed at opt-in.                                                                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 33 | You handle reassigned numbers (for example using the FCC Reassigned Numbers Database).                                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |

## 6. Security and privacy

| #  | Requirement                                                                                           | Yes                      | No                       | N/A                      | Evidence / notes |
|----|-------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|------------------|
| 34 | Consent and contact data are encrypted in transit and at rest. <b>CRITICAL</b>                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 35 | Access to our data is role-based and logged.                                                          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 36 | You have a written incident response plan and notify us of incidents within 48 hours. <b>CRITICAL</b> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 37 | You do not sell or reuse our contact data for any other client. <b>CRITICAL</b>                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 38 | You comply with applicable state privacy laws for our consumers.                                      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 39 | You carry cyber and errors-and-omissions insurance (state limits).                                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 40 | You can delete our data on request and certify deletion.                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |

## 7. Contract and accountability

| #  | Requirement                                                                                                     | Yes                      | No                       | N/A                      | Evidence / notes |
|----|-----------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|------------------|
| 41 | The contract requires compliance with the TCPA, state laws, CTIA guidelines, and carrier rules. <b>CRITICAL</b> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |

|    |                                                                                                                     |                          |                          |                          |
|----|---------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|
| 42 | You indemnify us for violations caused by your acts or omissions. <b>CRITICAL</b>                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 43 | You will notify us of complaints, demand letters, or regulatory inquiries within two business days. <b>CRITICAL</b> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 44 | We may audit your compliance and records at least annually.                                                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 45 | You name a compliance contact who is accountable for our program.                                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 46 | You have not been party to TCPA litigation or enforcement in the past three years (explain any).                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

## 8. Monitoring and training

| #  | Requirement                                                             | Yes                      | No                       | N/A                      | Evidence / notes |
|----|-------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|------------------|
| 47 | You report delivery, opt-out, and complaint rates to us monthly.        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 48 | You monitor carrier filtering and fix blocked campaigns promptly.       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 49 | Your staff complete TCPA and 10DLC training at least annually.          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |
| 50 | You review message content against registered campaigns before sending. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                  |

### ✓ Result

|                              |                                                                                                                                 |
|------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| Critical items answered "No" |                                                                                                                                 |
| Other items answered "No"    |                                                                                                                                 |
| Decision                     | <input type="checkbox"/> Approve <input type="checkbox"/> Approve with remediation plan <input type="checkbox"/> Do not approve |
| Next review date             |                                                                                                                                 |

Educational resource from MyTCRPlus Academy. Not legal advice. Rules and fees current as of September 2026; verify requirements with counsel and your messaging provider before relying on them.