



## Advertising and Marketing

All communications with the public fall into this category. Email signature lines, business cards, stationary, social media, presentations, web websites, etc.

## Review and Approval

It is the policy of the Firm that all advertising and marketing materials must be reviewed and approved prior to use with the public. All communications to client or prospects must be archived and subject to a post usage review.

## Submission

All advertising and marketing materials must be submitted to compliance and approved by compliance prior to use. The Firm's preferred method of submission is through LifeArcPlan™. If using LifeArcPlan™, all materials should be either uploaded through the system or attached as a link. Once submitted, compliance will review the material and either approve, approve with changes, or reject the submission. If an item is approved with changes or rejected, the compliance department will enter a note in the LifeArcPlan™ system about the changes required or the reason for the rejection. Normally, the submitted material will be classified as *approved* if minor changes need to be made. Items that require significant revision are rejected.

Once approved the item may not be changed without re-submitting for approval. Changes such as the date or location of a presentation may be updated without resubmission.

All work email addresses must be archived by the Firm. The Firm uses a third party to archive emails. If you are using a DBA, this address must be communicated to the Compliance Department and may not be used for work related purposes until you have received approval from the Compliance Department.

## General Disclosures

- **Business cards** – Investment advisory services are offered through Optivise, a SEC registered investment advisor. Optivise and (your DBA if applicable) are independent of one another.
- **Email signature** - Investment advisory services are offered through Optivise, a SEC registered investment advisor. Optivise and (your DBA if applicable) are independent of one another. Please note that registration with the SEC does not denote a certain skill level or guarantee the success of an investment strategy. Neither Optivise or (your DBA) provide legal or tax advice. Nothing within this communication should be construed as such. Any legal or tax advice given is



to only be considered general in nature and not specific to your specific situation. You are encouraged to consult a tax or legal professional with specific questions about your unique situation. All investments involve the risk of loss and change in value. Investments offered through Optivise are not FDIC insured or guaranteed by any governmental agency. Insurance products are offered through various insurance companies. All guarantees are based on the claims paying ability of the insuring insurance company.

*Please note that if you are a CPA the references to not providing tax advice may be removed.*

## **Email Usage**

All IARs must use only their approved email address when communicating with clients, prospects, or for business related matters. An approved email address is either your *@firm email address* or your email address at your DBA domain that is being archived by the Firm. Use of your personal email addresses should only be used in extreme cases, such as a failure of your approved email system. Using your personal or an unapproved email address for business purposes allows for regulators to review every item sent or received from that address.

## **Text Messaging**

Text messaging clients is not encouraged and should only be used for very simple administrative items; running 5 minutes late, auto response messages when you are on the phone, etc. Text messaging should never be used to communicate recommendations.

## **Websites**

As a general rule your website should be specific to your advisory business. If your website will combine advisory business with insurance or other approved services; advisory business should be on separate pages or any references to advisory business should be clearly defined so as to not potentially confuse a client or prospect.

Endorsement, client/professional recommendations, or quotes/testimonials from clients are prohibited. These are most often viewed as endorsement by regulators, which are strictly prohibited.

Your office address listed on the website must point back to your owned or leased branch office address. If you use an office of convenience (Regus, WeWork, Davinci, or other serviced, virtual offices or coworking spaces) this address may not be listed. You may state that appointments are available in that city or region, but you may not list that office address on your website. Regulators view this as being false and misleading to the public, giving the appearance your office is larger than it really is.

Any email address listed on the website or used in an automated "contact us" feature must be an approved and archived email address.

- **Footer (each page)** - Investment advisory services are offered through Optivise, a SEC registered investment advisor. Optivise and (your DBA if applicable) are independent of one another. Please note that registration with the SEC does not denote a certain skill level or guarantee the success of an investment strategy.

- **Links** – All links and linked articles must be reviewed and approved by compliance before being used.
- **Free Reports** – All free reports must be reviewed and approved by compliance before being used. The report request must tell the client that by requesting the report they may be contacted by you or a member of your office and/or receive emails from your office or the Firm.
- **Logos of Other Companies** – If you are displaying the logo of another company or organization on your website you must be authorized to do so; member of the BBB, displaying the CFP mark, etc. If you have been featured in an article or publication you may display their logo or state that you have appeared however you must provide a link to that article or appearance.
- **BrokerCheck** – Unless you are currently registered with a Broker/Dealer you should not display the BrokerCheck logo or link on your website. You may provide a link to the IAPD disclosure page or a link directly to your IAPD disclosure.

## Social Media

As a general rule a social media website, Facebook or LinkedIn, is considered a business website if it discusses the business, post content designed to have you contact the business, promotes a product or strategy, or is linked to your business website or referenced in your marketing or advertisements. This does not mean that you cannot list where you work or your occupation or post the occasional comment or article on work related matters on your personal page(s) but it does imply that clients and prospects will view your business website as their source of social media information for your business not your personal website. Business social media websites are subject to the same archiving rules and marketing and advertising rules as websites.

Additional guidelines for social media websites:

- The ability to add endorsements should be disabled and hidden on your LinkedIn account.
- The ability to comment on posts on Facebook should be turned off.
- The use of the messenger function or email systems for an social media website not be used and disabled if possible. If a message is received through this method you should, if possible, copy the message into your work email and respond to the message through your work email along with instructions that all future electronic communications be sent to this, your work, email.
- The use of 'burner'\* accounts or third party services to increase the number of followers, connections, or similar is considered to be manipulative in nature and is prohibited by the Firm.
- The use of 'burner'\* accounts or third party services to post articles favorable to the IAR or the Firm or to repost/share articles posted to the website is considered to be manipulative in nature and is prohibited by the Firm.

*\*Burner accounts are second (or third, fourth, fifth, etc.) social media accounts created to look like real people, or pretend to be another person, but are managed by you or someone else and not representative of the comments, actions, etc. of a real person. Burner accounts are typically used to increase followers, write favorable reviews/comments, support and/or defend positions, etc.*