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Marketing Consent and Opt-out Rules

Version 1.1.0 — Effective 1 December 2026
Operator: [บริษัท สยามวอยซ์ เอไอ จำกัด / Siam Voice AI Co., Ltd.] (brand: Nexora AI Call), referred to as the "Platform".

1. Purpose and scope

1.1 These rules apply to all **marketing** SMS, AI phone calls, LINE Official Account messages and other channel messages sent through the Nexora AI Call platform, whether the sender is the Platform itself or a tenant (business or individual user) using the Platform.

1.2 They set out: (a) how marketing consent is obtained and the consent wording; (b) SMS and call opt-out keywords, their detection and normalisation; (c) handling rules and time limits (SLA); (d) opt-out confirmation texts; (e) the relationship with the do-not-contact (DNC) lists; (f) sender-ID rules; (g) quiet hours and frequency; (h) record keeping.

1.3 Legal basis: the Personal Data Protection Act B.E. 2562 (2019) ("PDPA") (consent must be free, clear and withdrawable, and requested before or at collection together with notice of purposes, section 19; the data subject's rights to object and to withdraw consent, ss.30–36); the Consumer Protection Act; the Telecommunications Business Act B.E. 2544 (2001); and the general expectations of the regulators on nuisance and spam messages. These rules are the Platform's operating standard and may not be lowered by tenants.

2. Definitions

- **Marketing message**: a message or call whose purpose is to promote goods, services, a brand, an event or an offer, or to solicit customers, including a service notice that carries promotional content.
- **Service / transactional message**: a message sent to perform an existing contract or something the recipient requested, such as one-time passwords (OTP), appointment confirmations, bills, low-balance alerts and ticket progress. A service message must not carry marketing; if it does, the whole message is treated as marketing.
- **Marketing consent**: a voluntary, clear and provable consent given by the recipient to a particular sender, for a particular channel and purpose.
- **Opt-out / do-not-contact**: the recipient expresses in any way that they no longer wish to receive marketing messages or calls.
- **DNC (do-not-contact list)**: a list of numbers that must not be contacted for marketing, at platform level and at tenant level.
- **Sender ID**: the name or number shown as the sender of an SMS.

3. Obtaining marketing consent

3.1 Requirements

1. **Voluntary.** Marketing consent must not be a condition of using a service or buying goods (unless the marketing is itself the service). Declining must not affect use of the service.
2. **Clear and specific.** State the sender's name, the channel (SMS / phone / LINE) and the type of content (promotions, new products, events).
3. **Separate.** Obtain it through a separate, un-pre-ticked checkbox or a clear spoken confirmation, never bundled into the terms of service.
4. **Provable.** Keep evidence of consent (Section 12).
5. **Withdrawable.** Withdrawing must be as easy as giving consent (PDPA s.19): at any time by an opt-out keyword, by telling us on a call, on a settings page, or by contacting support.
6. **Per channel.** SMS, phone and LINE are independent. A tenant may ask for several at once but must list them and allow separate selection.
7. **Duration.** Consent lasts until withdrawn, but if the sender has had no interaction with the recipient for more than 24 months it must reconfirm or stop marketing.

3.2 Consent wording (web / app checkbox)

English

> ☐ I agree that [business name] may send me marketing messages (including promotions, new products and event notices) by SMS, AI-assisted phone calls and LINE. I understand I can withdraw consent at any time by replying "STOP" or saying "do not call me", and that not agreeing does not affect my use of the service. Privacy Policy: [link].

Thai

> ☐ ข้าพเจ้ายินยอมให้ [ชื่อธุรกิจ] ส่งข้อมูลทางการตลาด (รวมถึงโปรโมชัน สินค้าใหม่ และกิจกรรม) ถึงข้าพเจ้าทาง SMS สายโทรศัพท์โดยผู้ช่วย AI และ LINE ข้าพเจ้าทราบว่าสามารถถอนความยินยอมได้ทุกเมื่อโดยตอบ "ยกเลิก" หรือแจ้งว่า "อย่าโทรมาอีก" และการไม่ยินยอมไม่กระทบการใช้บริการ นโยบายความเป็นส่วนตัว [ลิงก์]

Chinese

> ☐ 我同意 [商家名称] 通过短信、AI 人工智能电话和 LINE 向我发送营销信息(包括促销、新品和活动通知)。我知道可以随时回复"退订"或说"别再打了"撤回同意,不同意不影响我使用服务。隐私政策见 [链接]。

3.3 Spoken consent (on a call)

If marketing consent is requested on a call, the AI must explain and obtain a clear answer within the same call:

> Do you agree that {business_name} may send you offers and event news by SMS or phone in future? You can withdraw at any time by saying "do not call me" or replying "STOP". Please answer "I agree" or

> "I do not agree".

Silence or an ambiguous answer counts as no consent. Consent must be accompanied by a recording or a system event record (any recording must follow the Call Recording Notice Scripts).

3.4 Confirmation of high-risk lists (optional)

High-risk lists (for example lists that were imported, bought or collected by third parties) must not be marketed to directly. The Platform requires a tenant uploading a list to show the source of consent evidence. Numbers without evidence may not be used for marketing; only a single service SMS "requesting consent" (with no promotional content) may be sent, and if the recipient does not reply with consent, it counts as no consent.

3.5 Prohibited practices

- Marketing to numbers that were bought, scraped or of unknown origin.
- Treating "reply with anything" as consent.
- Marketing to minors (accounts that are evidently minors).
- Deception, intimidation or false urgency to obtain consent.

3.6 Win-back, coupon and referral messages

(a) Churn win-back offers (for users inactive for 14 or 30 days or who cancelled a subscription), coupon announcements and referral invitations are **marketing** and are sent only to users who have granted consent_marketing and consent_winback (see PDPA Consent Texts); they are never sent to a number or address that has opted out or is on the suppression list. (b) They are scheduled automatically but checked against consent and opt-out status at send time, not only at scheduling time, and obey the quiet hours and frequency caps in Section 11 (they count toward the weekly cap). (c) Each message names Nexora AI Call as sender, states the offer's key terms and expiry, and carries the opt-out instruction. (d) A user who opts out of marketing still keeps coupons and referral rewards already earned; a user is never required to consent to win-back offers to use the Service or to redeem a coupon they enter themselves. (e) The platform does not message third parties on a user's behalf for referrals; a referral invitation is sent only by the referrer's own action through their own channel with their own referral code. Transactional messages (receipts, expiry-of-credit notices required by the Terms, security alerts) are not marketing.

4. SMS opt-out keywords

4.1 Keyword list

The following words (and their variants) are treated as SMS opt-out commands:

Language	Keywords
English	STOP, STOPALL, STOP ALL, UNSUBSCRIBE, CANCEL, END, QUIT, OPT OUT, OPTOUT, REMOVE, NO MORE

Language	Keywords
Thai	ยกเลิก, หยุด, เลิกรับ, ไม่รับ, ไม่ต้องส่ง, ยกเลิกรับข้อความ, ยกเลิกการรับข่าวสาร, หยุดส่ง, ลบเบอร์
Chinese	退订、TD、退、取消、取消订阅、停止、不再接收、别发了、不要再发

The Platform also recognises short sentences with a clearly refusing meaning (for example "Please stop sending me messages", "กรุณาอย่าส่งข้อความมาอีก", "请不要再发短信给我") and treats them as opt-outs.

4.2 Normalisation and matching rules

An inbound SMS is normalised as follows and then matched to the keywords:

1. Trim leading/trailing whitespace and collapse consecutive whitespace (including full-width spaces, non-breaking spaces, zero-width characters, tabs and line breaks) into one space.
2. Apply Unicode NFKC normalisation (full-width ＳＴＯＰ becomes STOP).
3. English is lower-cased (stop, Stop and STOP are equal); trailing punctuation and emoji are removed (for example "STOP!", "stop.", "Stop 👍").
4. Thai: remove redundant repeated tone marks, "ๆ" and polite particles ("ค่ะ", "ครับ", "นะ", "นะคะ", "หน่อย"); so "ยกเลิกค่ะ" and "หยุดนะครับ" equal "ยกเลิก" and "หยุด".
5. Chinese: remove modal particles ("了", "吧", "啊", "哦") and punctuation; "退订。" and "退订吧" equal "退订"; traditional forms "退訂" and "取消訂閱" are treated as equal.
6. Spaces or hyphens between words are allowed ("STOP ALL", "stop-all", "OPT-OUT").

Matching conditions (any one is an opt-out):

- (a) the whole normalised message equals a keyword;
- (b) the message starts with a keyword and has no more than 5 words in total (for example "STOP promotions", "ยกเลิกรับโปรโมชั่น");
- (c) the message is a short sentence with a clearly refusing meaning (4.1).

Uncertain cases. If a keyword appears inside a longer message (for example "I'll stop by tomorrow") it is not an automatic opt-out, but the system **suspends** marketing to that number until a person or AI review is complete, which must happen within 24 hours. If confirmed as an opt-out it is processed under these rules; if not, sending may resume.

4.3 Scope of an opt-out

1. An opt-out applies to the number's marketing on **all channels** (SMS, phone, LINE) under that sender (tenant).
2. It is also recorded on the **platform-level do-not-contact list**, so no tenant on the Platform may send marketing to that number (service / transactional messages are not affected).
3. An opt-out using "STOP ALL" or an equivalent has the same effect and clearly applies to all tenants.
4. An opt-out does not affect: OTPs, bills, appointment confirmations the recipient themselves requested, and notices the law requires us to send.

4.4 Later re-consent

After an opt-out, a number may receive marketing again only if the **number's holder personally** gives a fresh, clear consent (Section 3). Tenants or Platform staff may not re-enable it on their behalf. On receiving "START", "YES", "เริ่ม" or "订阅" the Platform may send a single SMS asking the person to confirm their intent, but must not use it for marketing.

5. Call opt-out phrases

5.1 Phrase list (detected by the AI during calls)

Language	Phrases (examples, not exhaustive)
English	do not call me, don't call me again, stop calling me, take me off your list, remove my number, put me on your do-not-call list, unsubscribe me
Thai	อย่าโทรมาอีก, ไม่ต้องโทรมา, หยุดโทรมา, อย่ามารบกวน, ลบเบอร์ฉันออก, ไม่อยากรับสายแบบนี้, ไม่ต้องติดต่อมาอีก
Chinese	别再打了、不要再打来了、别打扰我、不想接到你们的电话、把我的号码删掉、把我从名单里去掉、停止来电、请勿来电、以后别联系我

The system uses both keywords and semantic understanding (meaning prevails), and where speech-recognition confidence is low it leans toward treating the utterance as an opt-out (better to over-honour than to miss one).

5.2 Handling during the call

1. The AI apologises and confirms in a single sentence, without questioning, persuading, offering other deals or saying "one last thing" (script: see section 5.2 of the AI Disclosure Call Openings).
2. End the call immediately.
3. Log the opt-out event (number, time, call ID, triggering phrase, classification confidence).
4. Cancel all pending outbound call tasks and queued SMS for that number.

5.3 Confirmation of a call opt-out

The AI confirms verbally on the call, and the Platform sends a written confirmation SMS **once** under Section 7.

6. Handling rules and time limits (SLA)

Step	Time limit
On receiving an opt-out in a call or SMS: set "paused" in the send and dial queues	Immediately (target within 60 seconds)
Write to the platform-level and tenant-level DNC lists	Immediately (target within 5 minutes)
Propagate to all systems (SMS supplier, dialler scheduler, LINE push, tenant API/webhooks, data exports, data warehouse)	At the latest within **24 hours**

Step	Time limit
Opt-out requests by email, ticket, support phone or web form	Completed within **24 hours** of receipt
Review of uncertain cases	Within 24 hours
Webhook of the opt-out event to the tenant	Immediately; the tenant must sync its external systems within 24 hours

Additional rules:

1. For SMS already handed to a carrier but not yet delivered, the Platform will try to recall it where possible; an occasional message that reaches the recipient within the time limits for network reasons is not a breach, but must be logged.
2. An opt-out requires no identity verification, no fee, no reason and no login.
3. Tenants must not create obstacles, such as requiring the person to phone a human agent first.
4. Tenants must sync opt-outs to lists they import or hold in their own external systems within 24 hours.
5. The Platform audits timeliness of opt-out processing monthly; overruns are reported as internal incidents.
6. Repeated or systematic breaches may lead the Platform to suspend a tenant's right to send marketing.

7. Opt-out confirmation texts (sent once only)

After receiving an SMS or call opt-out, the Platform sends **one** confirmation SMS to that number, and thereafter sends nothing further about the same opt-out. The confirmation contains no marketing content and is sent only between 08:00 and 20:00 (Asia/Bangkok); if the opt-out occurs outside those hours it is sent at 08:00 the next day.

English

> [{brand}] We have received your opt-out request. You will no longer receive marketing messages or calls from us. This is our last message.

Thai

> [{brand}] เราได้รับคำขอยกเลิกของคุณแล้ว คุณจะไม่ได้รับข้อความและสายโทรศัพท์ทางการตลาดจากเราอีก ข้อความนี้เป็นข้อความสุดท้าย

Chinese

> 【{brand}】已收到您的退订请求,您将不再收到我们的营销短信和来电。本条为最后一条信息。

Any reply to the confirmation (including "STOP") does not trigger another confirmation and is merely logged.

8. Content rules for marketing SMS

Every marketing SMS must:

1. Clearly identify the sending brand at the beginning or end.
2. Include an opt-out method, for example "Reply STOP / ยกเลิก / 退订 to opt out". (The recipient's mobile carrier may charge for the reply message at its own rates; the Platform charges nothing for opt-out replies.)
3. Contain nothing false or misleading, or that suggests it is from a government agency, bank or carrier.
4. Contain no typical scam wording (such as "safe account", "parcel held by customs", "โอนเงินด่วน") and no suspicious short links.
5. Use a recognisable brand domain or a reviewed short link.
6. Use an approved template; the Chinese, Thai and English versions each need an approval status.

9. Relationship with the do-not-contact (DNC) lists

1. The Platform maintains a **platform-level DNC** (across all tenants) and **tenant-level DNCs** (per tenant).
2. Before every marketing SMS or outbound call the system checks both lists and any internal list the tenant has uploaded in real time; on a match it does not send and logs the reason.
3. If any statutory, regulatory or industry do-not-call register is established or required and applies to the Platform, the Platform will screen against it before sending as required; until then the Platform's own lists prevail. A recipient may also ask to be registered at [support@example.co.th].
4. The DNC stores only the minimum data needed to honour the refusal (number or its hash, scope, time, source), retained per Section 12.
5. Tenants cannot delete platform-level DNC entries, and tenant-level entries may be restored only in the case of Section 4.4.
6. If the same number appears in both a DNC and a consent record, the **later** event prevails, and marketing may resume only on the recipient's own new consent.

10. Sender-ID rules

1. A sender ID must be a name or number the tenant **owns or that the Platform has verified** (a number must be OTP-verified; a brand name needs trademark / business-registration evidence). It must not be spoofed or borrowed from others (including government, banks and carriers).
2. An alphanumeric sender ID is no more than 11 characters and is registered as the suppliers and regulators require.
3. Tenants are advised to use different sender IDs for marketing and service SMS.
4. Caller ID must never be hidden or falsified; AI marketing calls must display a verified number of the tenant.
5. A change of sender ID requires fresh review.

6. A sender ID that is complained about, blocked by a carrier, or found misleading may be suspended by the Platform at once.

11. Quiet hours and frequency

1. **Marketing** SMS and calls: Monday to Friday only, **09:00–18:00 Asia/Bangkok time**; never at weekends or on Thai public holidays.
2. Service / transactional: default 08:00–20:00 (tenant-configurable), except instant messages such as OTP.
3. A marketing send triggered during quiet hours is queued to the next permitted window rather than sent at once.
4. Frequency caps: no more than 2 marketing messages per week per number (SMS, phone and LINE combined); no more than 3 call attempts per day per number; tenants cannot bypass these limits.
5. If the recipient has already said that day that they do not want to answer, no further attempt is made that day.

1. Churn win-back, coupon and referral messages count toward the weekly cap in item 4 and are queued to the next permitted window like any marketing send.

12. Record keeping

1. **Consent records**: version and hash of the wording used, channel, scope, time, source (web / form / spoken), IP and device information (if any), operator; kept until the consent ends and for 3 years afterwards (to meet complaints and legal claims).
2. **Opt-out records**: number (or hash), channel, triggering phrase, time, completion time, propagation status; kept as long as needed to honour the refusal and for not less than 5 years (with the audit log).
3. **Send records**: send time, template, sender ID, delivery receipts; kept 1 year.
4. The Platform keeps legal-acceptance records (document key, version, hash, IP, UA, time) for these rules.
5. Data subjects may exercise their PDPA rights (access, rectification, erasure, restriction, objection, withdrawal of consent); the Platform responds within 30 days, and a complaint may be made to the Personal Data Protection Committee Office (PDPC).

13. Tenant responsibilities and Platform measures

1. A tenant is the data controller of its own marketing campaigns, must hold a lawful consent basis and is responsible for its content.
2. When ordering marketing calls or SMS a tenant must supply a lawful_basis_ref in the POST request (one of: a consent record, a contract, an assessed legitimate interest, or "own number").
3. The Platform samples marketing content and flags risk by keywords/LLM; on a breach it may suspend sending, suspend the tenant's outbound calling, and act under the Acceptable Use Policy.
4. The Platform may throttle or suspend tenants whose marketing complaint rate exceeds the threshold.

14. Complaints and contacts

For questions about marketing messages or help opting out: support [support@example.co.th]; privacy [dpo@example.co.th]; telephone [เบอร์โทรศัพท์]. We process opt-outs within 24 hours and answer other data-subject requests within 30 days.

15. Governing law and language

These rules are governed by the laws of the Kingdom of Thailand. They are published in Chinese, Thai and English; in case of conflict or ambiguity the Thai version governs (如有歧义以泰文版为准).
