

Marketing and Sales Systems

The following is a list of various marketing systems and vendors, marketing tools, and communication methods that have been reviewed in the past by National Life's Advertising Review Unit (ARU.)

Please be aware that while these items have been reviewed and found compliant in the past, it does not mean that they can be used as-is without further review. This is meant as a resource for systems and tools that should be approvable. **All marketing and communication must be submitted for prior review and approval to the ARU.**

The items that are asterisked are known to contain securities-related information, and would be limited for use by either registered representatives or investment adviser representatives of Equity Services, Inc.

COMPLIANT BOOKS

Note that due to their extensive review requirements, books will not be reviewed unless they are sponsored by National Life Group's senior leaders.

CAUSE! by Jackie and Kevin Frieberg (must be accompanied by the bookmark available on our website under Marketing/CAUSE – can be printed on your own printer)

Tax-Free Retirement by Patrick Kelly

UNAPPROVED BOOKS

The Power of Zero by David McKnight

The Retirement Miracle by Patrick Kelly

COMPLIANT CLIENT DATABASE PROVIDERS

For Agent/Registered Representative Use Only – Not For Use With The Public Revision May, 2019

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In general, desktop-based client databases such as ACT would only be seen by the agent, and would be used as a means for keeping track of client information, and recording client contact activity. This type of use would not be considered advertising, would not be subject to advertising review, and may be used.

If a client database had a marketing component – letter templates, email interface, etc., then those marketing and client communication pieces could not be used without prior review and approval.

Online client databases:

RedTail CRM, and SmartOffice have been approved for use for their client database functions only. Their reporting and marketing functions may not be used with the public. Registered representatives of ESI must sign an agreement with ESI regarding terms of use.

UNAPPROVED CLIENT DATABASE PROVIDERS

Only RedTail CRM and SmartOffice have been reviewed as of August, 2018.

COMPLIANT EMAIL MARKETING PROVIDERS

National Life supports two email marketing systems. Please note that all email marketing must comply with National Life's email marketing guidelines.

- **Emerald's** email marketing system, called **Automark**. AutoMark includes a vast library of previously approved financial articles, and allows agents to communicate with clients to help demonstrate their expertise, build rapport, and persuade their clients to act. Further information about Emerald can be found here.
- Faulkner Media Group (FMG) is an approved website provider, which also offers video newsletters which may be sent via email. FMG is also listed below under Newsletters, Seminars, and Website Providers.

UNAPPROVED EMAIL MARKETING PROVIDERS

- Calltextemail.com
- Constant Contact
- Outbound Engine
- Persontation

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e-Relationship

COMPLIANT LEAD SERVICES

- AgentInsider
- Dave Ramsey Endorsed Local Provider network (marketing requires prior review and approval)
- Discovery Data (recruiting)
- First Annuity Source Lead service
- Financial Planning Association PlannerSearch

UNAPPROVED LEAD SERVICES

- Lead Generating Systems, LLC may also be known as Unlimited Fulfillment Services, Inc.,
 Smart Leads, UFS Marketing Services, Annuity Leads and Annuity Leads Today
- Leadstoclose
- Netquotes

COMPLIANT NEWSLETTER PROVIDERS

Newsletters require review and approval before being disseminated. Many of the newsletters below – such as Emerald, ICG, Liberty and Newkirk – provide their content to us directly for review, so we only need to review the agent's personalization ("masthead") kept on file and added to the newsletter template by the publisher. For these types of newsletters, masthead information can be given a perpetual approval, and would not need further review unless changes were necessary.

Other newsletters are customized each month by the agent, requiring us to review and approve each new issue prior to publication.

- Brinker Capital*
- Emerald numerous titles*
- Forefield/Broadridge customized newsletters*
- FrontCenter Media Refined Living
- ICG Integrated Concepts Group titles include 401(k) Update*, Financial Briefs*, Financial Success*
- Liberty Publishing titles include 20/20*, Financial Insider*, Financial Planning for Business*, Financial Planning Strategies*
- Let's Talk Money*
- Newkirk Publishing titles include Four Bits*, Loose Change *
- Carson (formerly PEAK)*
- Peter Montoya*
- Platinum Advisors*
- WPI Communications Money At Work*

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On Demand electronic newsletters

Faulkner Media Group (FMG) – this is an approved website provider. Their video content
and articles may be combined to create electronic newsletters that can be sent on demand,
or can be scheduled to go out periodically. Content is automatically sent for compliance
review through FMG's system.

SALES SYSTEMS/SOFTWARE - COMPLIANT

New sales systems and software packages require extensive resources in order to fully review and modify them, and to stay on top of updates and revisions. New sales systems and software packages must be reviewed by National Life Group's Marketing Due Diligence committee to determine if there would be sufficient benefit to the field to warrant supporting the new system.

The following systems have been reviewed and found compliant in the past. While these systems have been found to be approvable, <u>all marketing materials for these systems would need to be submitted for prior review and approval.</u>

- Advocacy System
- BizEquity business valuation tool available on our website
- businessKillers
- BlackRock Social Security Estimator*
- Business of Medicine
- Circle of Wealth/Moneytrax (limited content) National Life has reviewed and approved a
 customized version of the following modules for authorized software subscribers only:
 - Circle Talk
 - Private Reserve Strategy
 - Mortgage Master
 - o Personal Economic Model all versions
 - Tax Master
 - Estate Planning (all modules)
 - o Qualified Plans
 - Three Legged Stool (Compact)
 - Market History
 - Circle of Knowledge
 - Other COW marketing
 - Also approved are the Confidential Questionnaire, 10 Questions script, and What Keeps You Up at Night factfinder.
 - Customized Four Questions flyer TC74143
 - Videos approved for adding to websites submit through your FMG or Emerald admin tool

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- o Club vs. Swing
- Personal Economic Model
- Qualified Plans
- Note that all other Circle of Wealth Modules and marketing materials are not approved for use.
- Cotton System
- eMoney Advisor* (for use by Investment Adviser Representatives of ESI only personalization of reports must be submitted for approval)
- ESI Illuminations*
- Fidelity Retirement Planner* (can be used by ESI RRs to determine retirement shortfalls, but not approved as a deliverable for fee-based planning)
- Financial Profiles Professional*, Professional web module*, and Forecaster*
- HorsesMouth Social Security / Baby Boomer tools
- Kinder Brothers Blueprint for Financial Success
- Kugler Estate Planning Strategy reports
- Lifetime Economic Acceleration Program (LEAP) (limited content) can be considered on a case by case basis for select producers. Please contact your advertising review analyst.
- The Money Couple
- Morningstar Advisor Workstation*
- National Life Group Advance Marketing Sales Process
- OnDemand web-based retirement seminar/marketing (Creative Juice is the publisher)*
- SAGE
- Send Out Cards (messages will require prior approval)
- Social Security Timing report must be submitted for review of personalization
- Sudden Money Institute for Investment Adviser Representatives of ESI only, who have completed SMI's training program
- TRAK paycheck software for use only within the 403(b)/457(b) marketplace

UNAPPROVED SALES SYSTEMS/SOFTWARE

The following systems have been reviewed and are specifically unapproved for agent use:

- 401k Safe
- Alignable.com
- Asset Map
- Be Your Own Banker
- Financial Educators/ProspectMatch.com/eBooklets
- HEAPlan Home Equity Acceleration plan heaplan.com
- Immediate Legacy Marketing
- Infinite/Infinity Banking System
- Mega Referral DVD system
- Missed Fortune 101

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- Outbound Engine
- RetireMint
- Safe Money Millionaire
- "Secrets of a Worry Free Retirement" ghost-written book and marketing system
- VectorVest Investment Reports
- Wealth Beyond Wall Street
- Wealth Building Cornerstones

COMPLIANT SEMINAR SYSTEMS

The following systems have been found compliant in the past. All marketing materials would need to be submitted for prior review and approval.

- National Life Group seminars found at nationallife.com
 - Business Owner seminar series*
 - o Qualified Plan / CPA Advantage
 - o Section 79
 - Prospecting seminars*
- businessKillers and Business of Medicine see also Sales Systems/Software
- Emerald*
- FMT Solutions*
- Forefield*
- HorsesMouth Social Security presentation
- Investment Company presentations* with a current FINRA letter of review any third party mutual fund or variable product company's marketing presentations

UNAPPROVED SEMINAR SYSTEMS

The Smart Money Management System / The Wealthy Banker

WEB SITES

Appointment, calendar sites – Approved

Blackbird RSVP

Appointment, calendar sites - Unapproved

- Calendly
- Go Once Hub
- Meetup.com

Recruiting Web Sites – Approved

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The following sites have been reviewed and approved as static sites that can be used for posting a recruiting ad. The ad should be complete with disclosures in case the site itself does not contain the required disclosures on the landing page. Your page/profile on the site must be reviewed and approved by compliance before you can post approved recruiting ads to it.

- LinkedIn
- Facebook
- Indeed
- MoneyJobs
- Wallstjob

Social Networking Sites

LinkedIn, Facebook, YouTube and Twitter are the only social networking sites that are approved for business use by insurance agents and registered representatives of ESI on our behalf, and only with prior approval (before content is published to the site). Proposed profiles must be submitted for compliance review and approved for publishing by a registered principal prior to creating your public profile. Existing social media sites should be submitted for review accompanied by any proposed changes for approval by a registered principal before adding the company's name to the sites. Placing an ending date after your prior position is allowed.

Registered Representatives of ESI who maintain a LinkedIn profile must also subscribe to Hearsay, the company's compliance and marketing tool. The compliance platform on Hearsay allows for a static profile and the ability to use InMail. The subscription fee for the Compliance platform is paid for by ESI as part of the rep's annual ESI fee. The marketing platform provides access to the Content Library on Hearsay and the ability to post or schedule for posting those articles in the Content Library. The Content Library contains hundreds of pre-approved posts on a variety of subjects. The Social Media policy in the Compliance section of the National Life Group website provides complete guidelines on the approved use of social media sites used for business purposes. Additional information on social media is available under Social Media in the Marketing section of the website.

UNAPPROVED SOCIAL NETWORKING SITES

Unapproved sites include but are not limited to: Alignable, Angie's List, BrightScope Advisors, Fishbowl, Kudzu, Meetup, MySpace, Opportunity, Periscope, Pulse/Plaxo and WeChat.

COMPLIANT WEB SITE PROVIDERS

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National Life has arrangements with two website providers – **Emerald** and **FMG (Faulkner Media Group)** to provide financial web sites for our full-time agents. Further information about both providers can be found here.

Third-party Websites (providers other than Emerald and FMG)

Third party websites can be considered only as an exception granted by the ARU and the SVP of the Career channel. Please note that prior to creating, subscribing or designing a third party website, approval must be obtained. As with all advertising and communications with the public, no portion of any website may go public before content or changes to content have been reviewed and approved for compliance with applicable regulations. In our experience, use of website providers other than Emerald and FMG involve a substantial amount of work and cost on the part of the agent, agency and the ARU therefore, exceptions are only granted based on a specific business need (generally when the primary business is other than securities or insurance such as CPA's, P&C agencies, Attorney's as well as various other factors). If an exception is granted, all desired content needs to be submitted as a pdf (or other document type), reviewed, and approved before it can be published. Agents planning on creating a website whose content is dynamic and changes often would need to submit the new content for prior review every time it changes, and we would need to approve it before it was posted to the web. Review time for third party and self-created websites is significantly longer than for Emerald and FMG websites. The majority of marketing content on Emerald and FMG has already been approved.

Emerald and FMG websites are the supported website providers for the company as many advantages are realized through these primary providers and those website reviews receive the highest priority. We have direct access to the content, and the vendors provide access to a vast library of previously approved content and give agents/reps the ability to add custom content. Their compliance tools also allow agents to input their changes offline, and they come directly to the ARU for review.

*Content is securities-related, and limited for use by registered representatives, or investment adviser representatives of Equity Services, Inc.

For questions regarding the above, please contact Mark Bates, ext. 3527.

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