

CareCredit Advertising Guidelines



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Overview

Important Notes

- ❖ These Advertising Guidelines are intended to be used **internally for the CareCredit Credit Card**. If you would like to share these Guidelines or any portion of them with client partners, please first consult with your Commercial Counsel or Marketing Counsel.
- ❖ These Advertising Guidelines consolidate, update and summarize **various sources of information that already exist and continue to remain compliant**. If a current advertisement or template has previously been reviewed and approved through the legal team, then it can continue to be used without any change, or alternatively it can be updated pursuant to any revised guidance provided in these Guidelines.

OVERVIEW

These Advertising Guidelines provide information to help advertise promotional financing and other offers associated with the CareCredit credit card. For more specific guidance not covered in these Guidelines, please contact a Member of the Legal Marketing Team.

Several laws and regulations provide specific guidance about how to promote financing offered through a credit card program. These laws include, but are not limited to, the following:

Federal and State Unfair, Deceptive and Abusive Acts and Practices Laws (UDAAP)

- These laws apply to everyone, not just Synchrony Bank as the creditor, and require advertisements to fairly and accurately state the terms of the offer and not be false or misleading.
- Specific credit advertising requirements are addressed in the Truth in Lending Act (TILA)

Truth In Lending Act (“TILA”) and Implementing Regulation Z

- These requirements apply to everyone, not just Synchrony Bank as the creditor. Therefore, all people and businesses must comply with Regulation Z if they advertise consumer credit transactions. The following site provides specific information about the Consumer Financial Protection Bureau (CFPB):
<https://www.consumerfinance.gov>

Fair Lending Requirements

- Credit must be offered to all applicants fairly and consistently. Failure to do so may result in allegations of discrimination, potential violations of federal or state fair lending laws, litigation or reputational risk. All applicants should be encouraged to apply for credit without fear of discrimination, which is prohibited by law. Types of discrimination includes race, color, religion, national origin, gender, marital status, age, source of income (in whole or in part) from public assistance programs, or an applicant's good faith exercise of a right under the Consumer Credit Protection Act.

Credit card advertising and marketing should be regularly reviewed and this document should be consulted to ensure compliance with these Guidelines. Please note that these guidelines do not apply to Installment Loan products that Synchrony Bank may offer.

Principles of Advertising Credit



Principles

Advertising and marketing to prospective customers is one of the most important activities we do. It promotes product awareness, the availability of credit to all creditworthy customers and provides information about our products and services with a view toward urging action on the part of the recipient. In responding to the “call to action” communicated by marketing efforts, customers are relying on the clarity and truthfulness of statements made in the marketing piece. **The client team is responsible for ensuring that advertising and offers approved by Synchrony are presented and executed in a compliant manner.**

Recognizing the role of marketing in promoting customer action, the legal principles and regulations concerning marketing are intended to accomplish related goals:

- Ensuring that the customer is making an informed decision in deciding whether to take the action called for
- Ensuring that the customer is properly informed regarding the relevant terms of the offer
- Ensuring that credit is made available to creditworthy customers without regard to any prohibited bases

The first of these goals underlies the laws governing Unfair, Deceptive or Abusive Acts or Practices (UDAAP). The second of these goals underlies the laws governing specifically required product disclosures, such as those required by Regulation Z. The third goal is consistent with the federal laws and regulations governing fair lending.

In addition to the above goals and requirements relating to the offered product which must be taken into account in developing marketing content, regulation of marketing activities also is governed by channel restrictions and requirements. For instance, special rules apply to offers made by telephone, pre-recorded offers and offers made by email. Additionally, laws are developing in new areas of communication, such as SMS text messaging and other electronic communications.

Finally, the law may place certain limits on how consumers are selected to be included or excluded from marketing campaigns. In many cases, requirements of anti-discrimination laws apply, and proper consideration of these requirements is necessary to ensure that applicable marketing tools and practices are used consistently and fairly. In all cases, proper marketing suppressions must be performed to honor customer choices in the areas of privacy, email and mobile marketing, and telemarketing. Additionally, care must be taken to ensure that offers are truthful for all recipients.

To avoid discouraging or offending individuals an advertisement is trying to reach, consider if the ad is unintentionally highlighting only one type of consumer and whether the entire target market is represented in the images presented in the ad. If pictures of people will be presented in the ad, consider showcasing diversity that includes representation from different races, ages, gender identities, disabilities, sexual orientation, cultures, and socio-economic statuses.

Principles

It is critically important to avoid marketing that is confusing or deceptive that will result in surprise or disappointment as the customer learns the details. Unfair, Deceptive or Abusive Acts or Practices (UDAAP) laws and regulations exist in all states and under Federal law to prevent sellers from wooing customers by misleading or deceiving them. The questions and answers that follow further explain how to evaluate whether a particular marketing piece could be Deceptive, Unfair or Abusive.

Question: What makes an advertisement or other communication deceptive?

Answer: An advertisement or other communication is deceptive if it contains a statement, omits or obscures information, so that the advertisement or communication is likely to mislead a reasonable consumer to an important (i.e., “material”) term of the product or service advertised. Where an advertisement or communication is targeted to a group of consumers, the sophistication and understanding of the targeted audience is used as the standard instead of the “reasonable consumer” standard. A statement is material if it would make a difference in the customer’s decision whether or not to take advantage of the advertised offer.

Things to watch for:

- * Context and overall impression are critical. If the headline or large print on an ad or communication gives a strong impression regarding the terms of the offer, but the disclosure significantly qualifies the impression, then additional information in the headline or subheadline is required to justify the context. While disclosures may be used to provide additional details about an offer, disclosures should never be used to “correct” a misunderstanding caused by a headline. Additionally, qualifying disclosures must be legible, understandable and sufficiently prominent. It should be noted that legal challenges related to an advertisement or other communication are judged by the “reasonable consumer” standard (at best) and in some cases, the “least sophisticated consumer” standard. This means that technical accuracy of a given marketing campaign claim will not surpass the net takeaway associated with the advertisement.
- * Express and implied claims will be scrutinized. An express claim is one that is clearly stated. An implied claim is one that the reader would likely assume is a “given” by reading the ad.

Principles

Question: What makes an advertisement or practice unfair?

Answer: An advertisement or practice is unfair if it causes, or is likely to cause, substantial consumer injury which the consumer could not reasonably avoid and is not outweighed by the benefits to the consumer.

Question: What makes an advertisement or practice abusive?

Answer: An advertisement or practice is abusive if it materially interferes with the consumer's ability to understand a term or takes unreasonable advantage of the consumer's lack of understanding, inability to protect his/her interests or reasonable reliance on a person to act in the consumer's best interest.

In summary, a marketing communication must:

- I. Be literally true (and must be reasonably likely to remain so for a reasonable time, with no present intention to change)**
- II. Not be subject to multiple interpretations**
- III. Not omit any material condition or limitation that could influence the customer's decision to respond to the call to action**
- IV. Not take unfair advantage of the consumer.**

General Advertising Guidelines

- Parts of an Offer
- Dos and Don'ts



Parts of an Offer – Headline/Subheadline

HEADLINE

First copy a consumer reads standing out from the rest of the advertisement

Typing an Offer to the Disclosure: If a superscript symbol or number is used to identify that there is a disclosure associated with the headline, generally place that superscript at the end of the headline, although on occasion it may make sense to place it in a different location within the headline or subheadline.

SUBHEADLINE

Contains material information about the offer

Location

The Subheadline must (1) immediately follow, be connected, or adjacent to the Headline, (2) be presented in a reasonable size in relation to the Headline, and (3) be provided in a clear and conspicuous manner.

Size

Subheadline must be in a reasonable size in relation to the Headline, but not less than 10pt font (based on a standard 8.5 x11 piece of paper). Increase the font size proportionately for larger collateral. A good benchmark is 40% of the Headline especially since the subheadline cannot look like a disclosure.

Parts of an Offer - Disclosure

DISCLOSURE

Provides additional important information about the offer that a consumer should know before making a decision to take advantage of the advertised service or product. The disclosure may not contradict or take away from the general impression of the offer.

Location

- Single page document: Disclosure needs to be on the same page as the offer. If disclosure is on the reverse/back side of the page, a redirect (See reverse for details, etc.) is required on the side of the document with the offer.
- Multi-page document: Disclosure can be on the same page or a different page of the document. If disclosure is not on the same page, a redirect (See page XX for details) is required on the page with the offer.
- Electronic: disclosure must be on the same page or *no more than one click away* from the offer.

Size: Minimum font size for disclosure copy is 8pt (based on a standard 8.5 x 11 piece of paper). Increase the font proportionately for larger collateral. The disclosure must be easily readable, considering the size, format, channel and location of the advertisement. For instance, make sure print color contrasts with background color to ensure that the disclosure is legible.

Tying an Offer to the Disclosure : An offer must be connected to its disclosure in a manner that allows a consumer to easily find and read it. How to do this:

OPTIONS

- ❑ Place the same superscript symbol or number in the appropriate location within the offer (typically, the headline) and at the beginning of the corresponding disclosure. If there is more than one offer in a document, a different superscript symbol or number must be used for each one.
- ❑ If multiple disclosures are required on one piece, use one superscript symbol or number within each headline requiring a disclosure. Then preface the disclosure section with that same superscript symbol or number and identify each disclosure with an abbreviated version of the headline in bold or underlined. Present information in a logical order.
- ❑ Place the disclosure immediately after the headline and subheadline for a space constrained piece such as a billing statement overlay. When this close proximity approach is used, a superscript symbol is not required.
- ❑ Electronic: May use **Click for details** or *See below* or other indication of where the disclosure is located, with or without superscripts, if the link is worded in a manner that allows a reasonable consumer to identify the appropriate disclosure.

Dos & Don'ts

TOPIC	DO	DON'T
Material Terms	Include all material terms of an offer clearly in the headline or subheadline of an offer. A disclosure cannot fix a potentially misleading, deceptive or untrue headline. What is a material term? An important piece of information that is likely to influence or the omission which is likely to mislead, a consumer's decision whether to buy or use the product or service advertised. See below for some common examples of what may be deemed a Material Term.	<ul style="list-style-type: none"> • <i>Don't place material terms of an offer in a disclosure.</i> • <i>Don't make material terms in marketing copy look like disclosures</i>
EXAMPLES	DO	DON'T
Use of CareCredit Credit Card	Include "with your CareCredit credit card" or an image of the credit card(s) in the headline or subheadline of the ad if use of the credit card is required to get the offer.	Don't hide that use of the CareCredit credit card is required for an offer.
Qualifying Purchase	Communicate the minimum purchase amount or qualifying products (if applicable) clearly and conspicuously.	Don't imply an offer applies to all purchases if it is not true.
Limited Time	If the offer is not available all the time, clearly and conspicuously communicate the date range the offer is available or other indication that the offer is for a limited time. If the advertisement only indicates that the offer is for a limited time (versus providing the specific dates) work with your Legal Marketing Team Member to determine how to communicate specifically when the offer will be available.	Don't imply an offer is available every day if it is available only for a limited time.
Where Available	If the offer is only available in a particular channel, clearly and conspicuously communicate that in the advertisement. Examples: "Online Only" or "In-store Only" "Select Stores" etc.	Don't imply that an offer is available everywhere if it is not.
Special Instructions	Is the offer for 1x use only or is a coupon required? Include any instructions necessary to take advantage of the offer.	Don't leave out any necessary information!
Exclusions	State "exclusions apply" or list exclusions. (There are some exceptions: Gift Cards and tax are not material exclusions that must be called out in marketing copy but they are listed in the disclosures.)	Don't imply that the offer is on everything if there are merchandise exclusions.

Include all the material terms in the headline/sub-headline of the offer.

Dos and Don'ts

TOPIC	DO	DON'T
General Benefit of a Credit Card	Approved: "Buy Now Pay Over Time". This headline does not imply that a period of time may exist where a payment will not be due.	<i>Don't use any language that could be interpreted to mean that there is a period of time when payments will not be due.</i>
Displaying Programs with PLCC and DualCard	If an ad displays both a DualCard and a PLCC, ensure from the visual representation of the cards that the consumer can see that there are two different types of cards. If the card images overlap, the bottom right hand corner of both cards must be visible. Alternatively, present both cards side by side. In addition, follow the association specific requirements.	<i>Don't hide that there are two different types of credit cards available.</i>
Offers by Channel	If there is an online offer and a direct mail/email offer, then they should be the same unless Marketing/Fair Lending Tollgate has reviewed and approved.	<i>Don't have different offers in different channels for the same product, unless approved through FL/Marketing tollgate.</i>
Comparisons in ads	If an ad contains comparisons or claims then they must be substantiated and literally true for the entire population and not subjective.	<i>Don't include superlatives in ads unless confirmed substantiation</i>
Advertising other financial providers with the CareCredit credit card	When financing or other promotions from CareCredit <i>and</i> other financial providers (including in-house financing) are mentioned in the same collateral, make it clear that <i>not all</i> promotions are offered on the CareCredit credit card by identifying the lender providing each offer. Two ways to display this information include: <ul style="list-style-type: none"> • Include program name in the offer subhead (if each provider has a unique program name) • Add the name of each financial provider to subhead 	<i>Don't confuse credit products offered by other financial providers with those offered by the CareCredit credit card.</i>

Credit Related Offers

- Types of Credit Offers
- Promotional Financing
- Monthly Payments
- Non-Promotional Financing



Types of Credit Card Related Offers

Promotional Financing

CareCredit offers the following types of Promotional Financing

- ✓ DI: Deferred Interest (promo terms expire at end of promo period)
- ✓ FPRA: Fixed Pay – Reduced APR (promo terms never expires)

There are three ways typically used to promote these Promotional Financing offers:

1. **Trigger/Promotional Headlines** - include a trigger term such as “No Interest” or a specific APR
2. **Combo Headlines** - no trigger terms are included, but a promotional period is advertised
3. **Generic Headlines** - neither a trigger term nor the promotional period are advertised

Non-Promotional Financing Offers

Even if Promotional Financing, a Loyalty Program or Acquisition Offer are not being advertised, there are other benefits that may be available in connection with the CareCredit credit card. These benefits may include: Cardholder Discounts, Special Events, Rebates, Birthday Offers, Etc.

Loyalty Programs

Loyalty programs promote the use the CareCredit Mastercard by rewarding cardholders for such use. Such programs are governed by both federal and state laws which include, but are not limited to:

- ✓ UDAAP
- ✓ Escheat or Abandoned Property Laws
- ✓ Gift/Prepaid Card and Gift Certificate Laws
- ✓ Intellectual Property
- ✓ Specific Laws applicable to the type of reward

Examples of Loyalty programs include:

- Gift/Reward Certificates/Points
- Statement Credit
- Cash Back
- Airline Tickets/Hotel/Merchandise/Miles
- Gas

Acquisition

A benefit may be offered to a consumer for either applying for or opening an account. An acquisition offer must clearly state the specific action required by the consumer to receive the benefit.

For instance, if a consumer must actually open an account to obtain the benefit, then such an offer must be worded similar to: **Open an account and get.... OR Apply and if approved get..**

However, if simply completing an application allows a consumer to obtain the benefit, then it is appropriate to word such an offer similar to: **Apply and get...**

In addition to the action required being accurately stated, other terms of the offer must be considered and addressed, some of which are unique to these types of acquisition offers and others which apply to most types of credit card related offers.

Promotional Financing

- How Promotional Financing Works
 - ✓ Promo Terms That Never Expire
 - ✓ Promo Terms That Expire
- Reg Z Requirements
 - ✓ Trigger Terms
 - ✓ Reduced APR
 - ✓ Deferred Interest
 - ✓ Advance Promo Notice
- UDAAP
 - ✓ Material Terms of a Promotional Financing Offer
 - ✓ Ways to Advertise Promo Financing
- Creating an Ad
 - ✓ FPRA - Trigger Term
 - ✓ Deferred Interest - Trigger Term
 - ✓ Combo
 - ✓ Generic
- Provider/Retailer Benefits/Requirements that may impact a Promotional Financing Offer



How Promotional Financing Works



How Promotional Financing Offers Work with Promo Terms That Never Expire

To accurately and compliantly advertise promotional financing offers, it is important to understand how each of the different types of offers work. The promos on this page have promo terms that never expire, so even if the promotional purchase is not paid by the end of the promotional period, the promo terms will continue until the purchase is paid in full. **No advance promo notice is required. Since the Promo Terms don't expire, there is no Reg Z restriction on the length of the promo period.**

Promotional Financing Offer	How it works	
	Interest	Monthly Payment
FIXED PAYMENTS/ REDUCED APR – FPRA PROMO TERMS NEVER EXPIRE	Interest is assessed on the promotional purchase at a reduced APR starting from the purchase date.	Fixed monthly payments are required until the promotion is paid in full. <ul style="list-style-type: none"> The fixed monthly payment is calculated by multiplying the amount financed by a payment factor that allows the financed amount and reduced interest to be paid by the end of the promotional period.

The fixed monthly payments:

- may be higher than the minimum monthly payment if the purchase is a non-promotional purchase, and
- are not subject to the standard minimum monthly payment otherwise applicable to the account.

FPRA PROMOS CARECREDIT OFFERS:

- **24 months** promotional financing with a **17.90%** APR on purchases of **\$1,000** or more
- **36 months** promotional financing with a **18.90%** APR on purchases of **\$1,000** or more
- **48 Months** promotional financing with a **19.90%** APR on purchases of **\$1,000** or more
- **60 Months** promotional financing with a **20.90%** APR on purchases of **\$2,500** or more

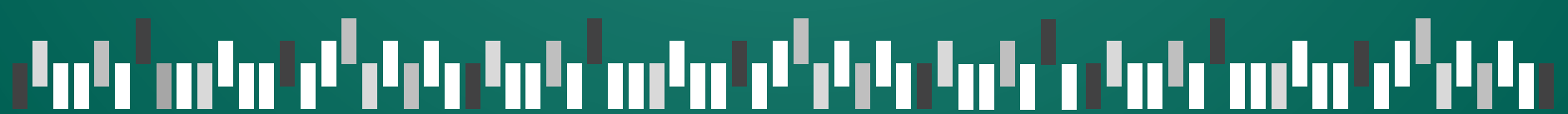
How Promotional Financing Offers Work with Promo Terms That Expire

To accurately and compliantly advertise promotional financing offers, it is important to understand how each of the different types of offers work. The promo terms on this page expire at the end of the promotional period at which time the standard terms of the account will apply. **Advance Promo Notice is required to expire the promotion to the standard APR. Since the Promo Terms expire, Reg Z requires the promotional period to be 6 months or longer.**

Promotional Financing Offer	How it works	
	Interest	Monthly Payment
DEFERRED INTEREST (“DI”) - PROMO TERMS EXPIRE AT END OF PROMO PERIOD	Interest accrues on the promotional balance during the promotional period at the accountholder’s standard rate for their account, and is shown on the billing statement as accrued interest. <ul style="list-style-type: none"> • If the promotional balance <u>is paid in full</u> by the end of the promotional period, the accountholder will not be charged any interest on the promotional balance. • If the promotional balance <u>is not paid in full</u> by the end of the promotional period, the accountholder will be charged the interest that has accrued at the standard APR on the account on the promotional balance from the transaction date. 	A minimum monthly payment is required, and varies based on the accountholder’s balance. Each billing statement will display the required minimum monthly payment due on the account. If only required minimum payments are made, the promotional balance may not be paid off by the end of the promotional period. Factors that determine this are: <ul style="list-style-type: none"> • Amount of the promotional balance • Length of the promotional period, and • Whether there are other balances on the account.

DI PROMOS CARECREDIT OFFERS: 6, 12, 18 and 24 Months

Reg Z Requirements – Promotional Financing



Reg Z – Actually Available Terms and Use of "Fixed"

ACTUALLY AVAILABLE TERMS

If an advertisement mentions specific credit terms, it may state only those terms that will be offered.

- A very low annual percentage rate cannot be advertised if it is not in fact available at any time. This is not intended to inhibit the promotion of new credit programs, but to bar the advertising of terms that are not and will not be available. For example, terms may be advertised that are only offered for only a limited period, or terms that will become available at a future date.
- Specific credit terms are not limited to the disclosures required by Regulation Z but would include any specific components of a credit card agreement, such as the minimum periodic payment amount.

USE OF TERM FIXED

An advertisement may not refer to an annual percentage rate as “fixed,” or use a similar term, unless the advertisement also specifies a time period that the rate will be fixed and the rate will not increase during that period. If no such time period is provided in the advertisement, then the rate cannot increase while the credit card agreement with the consumer is open.

Reg Z – Trigger Terms

TRIGGER TERM REQUIREMENTS

Certain terms stated affirmatively or negatively in an advertisement for a credit card trigger additional disclosures. Trigger Terms Include:

- No Annual Fee
- A statement of when finance charges begin to accrue or any grace period
- Charges imposed as part of the credit card program. These include:
 - Finance Charges
 - Charges resulting from failure to use the credit card program as agreed
 - Charges for voluntary credit insurance, debt cancellation or debt suspension.

Additional Disclosures: If an ad includes a trigger term, then the following additional information is required to be clearly and conspicuously disclosed:

- Any minimum, fixed, transaction or similar charge that is a finance charge
- Any APR that may be applied. If the APR is variable, that fact shall be disclosed
- Any membership or participation fee

Clear and conspicuous for trigger term disclosures means they are provided in a reasonably understandable form. Regulation Z does not require any specific placement or type size for this specific disclosure, but please see [general disclosure instructions](#). For disclosures provided orally, this standard requires they be given at a speed and volume sufficient for a consumer to hear and comprehend them.

A Radio or TV Ad, may alternatively comply with these disclosure requirements by stating the APR information and listing a toll-free telephone number along with a reference that such number may be used to obtain the additional cost information such as “call 1-(800) 000-0000 for details about credit costs and terms.”

Reg Z – Reduced APR Advertising

REDUCED APR REGULATION Z REQUIREMENTS

- If a promotional rate is stated in an advertisement, the following must be stated in a clear and conspicuous manner:
 - when the promotional rate will end (must be at least 6 months), and
 - the APR that will apply after the end of the promotional period (often referred to as the “go to APR”)
- If the APR that will apply at the end of the promotional period is a variable rate, the go to APR is the rate that would have applied at the time the promotional rate was advertised if the promotional rate was not offered, consistent with the application accuracy requirements, as applicable.
 - For written or electronic advertisements:
 - The required information must be stated in a prominent location closely proximate (in the same paragraph) to the first listing of the promotional rate. Information in a footnote is not sufficient.
 - Clear and conspicuous means that the required information must be equally prominent to the promotional rate to which it applies where same type size is deemed to be equally prominent
- If any APR or fee that may be applied to the account is an introductory rate or fee, the term “introductory” or “intro” must be in immediate proximity to each listing of the introductory rate or fee in a written or electronic advertisement.
 - For written or electronic advertisements:
 - ✓ Immediate proximity means the term “introductory” or “intro” must be in the same phrase as each listing of the intro rate or fee

BANNER/ENVELOPE EXCEPTION: The requirement to disclose the go to APR does not apply to envelopes in which an application or solicitation (prescreen offer) is mailed or to banner/pop-up advertisements, linked to an application or solicitation provided electronically. From a UDAAP perspective, the standard headline, subheadline and disclosure information must be one click away from the banner or inside the envelope. The application requirement in this exception can also be satisfied with a prequalification process.

NOTE: Since CareCredit’s “Fixed Payments/Reduced APR” promotional financing offers have promo terms that never expire, these specific Reg Z requirements are not applicable to those types of promotions. However, Reg Z Trigger Term requirements would still apply.

Reg Z - Deferred Interest Advertising

DEFERRED INTEREST HEADLINE REQUIREMENTS

- The Deferred Interest Period must be stated in a clear and conspicuous manner in the advertisement.
- If “No Interest” (or similar phrase) is used, the phrase “if paid in full” must be stated in a clear and conspicuous manner before the Deferred Interest Period. For written or electronic ads, this means equal prominence, where same type size is deemed to be equally prominent.

For written and electronic advertisements:

- ✓ The Deferred Interest Period and “If paid in full” (if applicable) must be stated in immediate proximity (in the same phrase) to each statement of “no interest,” “deferred interest” or similar term regarding interest or payments.

DEFERRED INTEREST SUBHEADLINE REQUIREMENTS

The ad must state the information below.

1. That interest will be charged from the date the consumer becomes obligated for the balance or transaction subject to the promo if the balance or transaction is not paid in full within the deferred interest period; and
2. If applicable, that interest will be charged from the date the consumer incurs the balance or transaction subject to the promo if the account is in default before the end of the deferred interest period. (This is not applicable for Synchrony credit card accounts)

The language should be similar to the following: “Interest will be charged to your account from the purchase date if the purchase balance is not paid in full within the/by [deferred interest period/date] **or if you make a late payment.**” - This sentence is sometimes referred to as the “G24 sentence”. Since Synchrony does not kick accounts out of a promo if a payment is late, the language in red above is not required and should not be included in any CareCredit ads.

For written and electronic advertisements:

- ✓ The sub-headline information must be stated in a prominent location closely proximate (in the same paragraph) to the first statement of “no interest,” “deferred interest” or similar term regarding interest. Information in a footnote is not sufficient.

BANNER/ENVELOPE EXCEPTION: The subheadline language (Interest will be charged...) is not required on an envelope or other enclosure in which an application or solicitation (prescreen offer) is mailed, or on a banner advertisement or pop-up ad linked to an application or solicitation provided electronically. From a UDAAP Perspective, the trigger headline, subheadline and disclosure information must be one click away from the banner or inside the envelope. The application requirement in this exception can also be satisfied with a prequalification process.

Reg Z – Advance Promo Notice (APN)

The APN rules apply only to promotional financing offers with promo terms that expire. Therefore, it is not applicable to FPRA promos.

As a general matter, Reg Z does not allow an increased APR to apply to existing balances on an account, unless an exception applies. The APN rules provide a promo exception allowing an increased APR to apply at the end of a promo or accrued interest to be assessed at the end of a deferred interest promotion, if:

- The promotional period is 6 months or longer AND
- Prior to the start of the promo period, the following is disclosed in writing to the consumer:
 1. The length of the promo period; and
 2. The actual APR that will apply after the promo expires or, for deferred interest promotions, the rate that applies during the promo period
- APN Requirements:
 - Must be in writing – limited exception for telephone promos. Electronic notice is deemed to be in writing provided there is valid e-consent from the recipient.
 - Must be clear and conspicuous
 - Must be in “close proximity and in equal prominence” to the first listing of the promo headline
 - Must be provided before the promo period
 - Must include the specific APR applicable to the cardholder
 - If the APR is variable, must disclose that the rate is variable and how the rate is determined (i.e., “This APR will vary with the market based on the Prime Rate.”)
- If the APN is not provided before the promotional period begins:
 - *For a deferred interest promotion:* Upon expiration of the promo, interest cannot be assessed that has accrued during the promo period
 - *For a Reduced APR promotion:* Upon expiration of the promo, the lower promo APR (e.g., 17.90%) must continue to apply to the remaining promo balance until it is paid in full

APN – Sample Verbiage and Method of Disclosure

Sample Disclosure - Deferred Interest Promotion:

“Your purchase qualifies for the following promotion: No interest if paid in full within [X] months. If the promotional balance is not paid in full within [X] months, interest will be imposed from the transaction date at [a variable] [an]APR of [XX.XX%]. [This APR will vary with the market based on the Prime Rate.]”

Note: Synchrony often adds additional information to the Advance Promo Disclosure to address other elements of the promo, e.g., that payments are required during the promo period.

Methods of Disclosure

Synchrony generally relies on two disclosure methods:

1. APN provided at time of purchase
2. “Prenote” APN provided to cardholders via multiple channels

1. APN at Time of Purchase:

- Practice/retailer Purchases – APN provided either on Pin Pad (after eConsent) or on receipt
- Online Purchases – APN provided online before Checkout (with eConsent, if necessary)
- Telephone Purchases – APN provided orally during call and written copy sent to cardholder shortly thereafter

2. Prenote APN Disclosures: Synchrony periodically provides APN disclosures to cardholders in programs with promotions in some or all of the following ways:

- New Applicants – The APN disclosures are included in the new account documents or as a card carrier insert
- Statement Active Cardholders – A statement message with promo disclosures is included in every statement
- Inactive Cardholders – A direct mail or email is provided with promo disclosures periodically

If a provider/retailer offers any promotional financing offers with promo terms that expire (e.g., DI), APN is required to be in place prior to launching the offer. Make sure:

- Provider/Retailer has updated their Point-of-Sale system to meet the deadline
- Provider/Retailer has updated their online functionality if promo purchase can be made in that channel
- Synchrony has updated any applicable call centers scripts and prenote mailings

UDAAP – Promotional Financing Ads

UDAAP (Unfair, deceptive or abusive acts or practices)



UDAAP - Material Terms of Promotional Financing That Impact Subhead

In addition to Regulation Z requirements, when advertising a Promotional Financing offer, you must address general UDAAP considerations and include material terms of the promotion in a clear and conspicuous manner. For UDAAP related information, this means presenting the material terms in a manner that is difficult to miss and easily understandable by an ordinary consumer. Including the material terms in the marketing copy, such as a subheadline, is one way to meet this objective; but you can work with your LMP on alternative ways depending on the customer experience. This list provides some common considerations, but others may exist and should be addressed as applicable.

QUESTIONS TO ADDRESS	CONSIDERATIONS
<p>Channel of Offer Availability Is the offer different by channel or for different cardholder populations or retailer/provider locations?</p>	<p>If the offer is different by channel, cardholder population or retailer/provider location, Fair Lending Tollgate approval is required. If different offers are in the market simultaneously, consider how they are advertised and how a consumer will understand which offer may be applicable to their purchase.</p>
<p>Promo Period Is the promo period for a specific number of months or does it end at a specific month/year for all consumers?</p>	<p>Consider not only the APR, but also how the monthly payments will be calculated since for Fixed Payments/Reduced APR promotions a unique monthly payment is required and is a material term of the promotion. It is also the only aspect of the promotion impacted by the promo period since for these promos the reduced APR does not expire.</p>
<p>Required Payment Type What credit card product(s) must be used for the offer?</p>	<p>Include an image of the credit card or the card name in text in the subhead for trigger and combo ads, except as otherwise allowed in these Guidelines. If an image is used, its size and proximity must clearly indicate to a reasonable consumer that the credit card is required to get the promotion.</p>
<p>Offer Availability Is this an everyday offer or only available during a specific time period?</p>	<p>Everyday Offers have no intended end date and therefore dates would not be included in the subhead. However, in order to reserve our right to discontinue the offer, include the following language in the disclosure: We reserve the right to discontinue or alter the terms of this offer any time. If a possible everyday offer is being tested, dates can be included until the test period is over.</p>
<p>Automatic or Ask For Offer Is the offer automatic or does the consumer need to ask for it, present a coupon or provide a code?</p>	<p>If the offer is not automatic, clearly communicate in the subhead what consumers need to do, such as ask for it, present a coupon, input a code online, or any other activity.</p>
<p>Abbreviations Can abbreviations be used to address a limited space situation?</p>	<p>If abbreviations are used, they should be done in a limited manner and only as required. In addition, only common abbreviations should be used, which may include:</p> <ul style="list-style-type: none"> • ltd for limited • promo for promotional • mo for month or mos for months • pymts for payments

UDAAP - Material Terms of Promotional Financing That Impact Subhead

In addition to Regulation Z requirements, when advertising a Promotional Financing offer, you must address general UDAAP considerations and include material terms of the promotion in a clear and conspicuous manner. For UDAAP related information, this means presenting the material terms in a manner that is difficult to miss and easily understandable by an ordinary consumer. Including the material terms in the marketing copy, such as a subheadline, is one way to meet this objective; but you can work with your LMP on alternative ways depending on the customer experience. This list provides some common considerations, but others may exist and should be addressed as applicable.

QUESTIONS TO ADDRESS	CONSIDERATIONS
<p>Qualifying Transactions What specific transactions qualify for the offer?</p>	<ul style="list-style-type: none"> • Are there only specific merchandise categories that qualify or purchase thresholds that qualify for the offer? If so, then state what those are or use the words, “qualifying” or “select” as allowed. • If “every, all, any and entire” appear in the marketing headline, are there any exceptions to the offer? If only gift cards are excluded, then the words “every, all, any, etc.” can be used provided the gift card exception is stated in the disclosure since it is typical in the market to exclude gift cards from offers so it should not negatively impact a customer’s expectations. If there are other exceptions, then either: remove any reference to “every” or if a client would like to be able to use “every, entire, or all” in the headline, then the exception must be included in the subheadline right below the headline (e.g., “10% Off your entire purchase, excludes [insert exclusions]). • If purchases in general qualify for the offer, but exclusions apply, may state exclusions apply in the subheadline or list exclusions in disclosure, depending on significance of the exclusions – such as the percentage of the client’s sales that make up those excluded items. • If only certain merchandise qualifies for the offer, confirm whether any other items purchased on the same sales receipt will also qualify for the offer or if they will be subject to different financing terms. • If a promotion is touted and there are qualifying purchases, then the products pictured in close proximity should qualify for the promotion.
<p>Discounts Are any other discounts available that may impact any qualifying purchase amount?</p>	<p>If a coupon, rebate or discount that is only available with the credit card reduces the purchase amount resulting in the consumer not satisfying the purchase threshold for a promotional financing offer, that information must be stated in the subhead and disclosure. NOTE: If there is no purchase threshold for the financing promotion, or if the purchase amount to satisfy the threshold is not reduced when a rebate, discount or coupon is used, then the additional language is not required.</p>
<p>Qualifying Purchase Amount If there is a qualifying purchase threshold amount, how must it be satisfied?</p>	<ul style="list-style-type: none"> • Confirm that a single item does not need to satisfy the purchase requirement and that all items (including shipping and tax) on a single receipt qualify toward the purchase threshold. • Confirm multiple receipts cannot be combined to meet purchase threshold.

UDAAP - Material Terms of Promotional Financing That Impact Subhead

In addition to Regulation Z requirements, when advertising a Promotional Financing offer, you must address general UDAAP considerations and include material terms of the promotion in a clear and conspicuous manner. For UDAAP related information, this means presenting the material terms in a manner that is difficult to miss and easily understandable by an ordinary consumer. Including the material terms in the marketing copy, such as a subheadline, is one way to meet this objective; but you can work with your LMP on alternative ways depending on the customer experience. This list provides some common considerations, but others may exist and should be addressed as applicable.

QUESTIONS TO ADDRESS

Down Payments

Does the provider/retailer require a Down Payment for that which the promo applies? If yes, then the considerations on this page must be addressed and factored into advertising the offer.

CONSIDERATIONS

- Is the down payment only required if the consumer uses the CareCredit credit card or is the down payment required regardless of the form of payment? Whether the down payment is required or not required must be clear in the advertisement.
- How much down payment is required? Is it based on a percentage of the sale or is it a finite amount such as the amount of the taxes or delivery or both? If the offer being advertised is impacted by the amount of the down payment, then how that down payment is calculated must be clear in the advertisement.
- What payment method can be used for the down payment? If the CareCredit credit card can or can't be used for the down payment, then that must be clear in the advertisement.
- If the CareCredit credit card can be used for the down payment, does the down payment qualify for a promotional financing offer? If the CareCredit credit card can be used for the down payment, then it needs to be clear whether the down payment qualifies for the promo.
- How does the amount of the down payment impact any qualifying purchase amount for a promotional offer? Is the qualifying amount determined before or after the required down payment? The impact of the down payment on any qualifying purchase amount must be clear.
- When is a down payment required? Is it required with every purchase or are there purchases that trigger its requirement? Depending on the answer to this question and the ad, a disclosure may be required.
- If the provider/retailer advertises a monthly payment on a product that requires a down payment, that will need to be factored into the advertisement depending on how all the responses to the previous questions are answered.

Always use the four P's test:

- I. **Prominence:** Is the offer prominent enough for consumer to notice?
- II. **Presentation:** Is the offer presented clearly and easy-to-understand?
- III. **Placement:** Are the offer details located where consumer would expect?
- IV. **Proximity:** Is the material information in close proximity to the offer?

Ways to Advertise Promotional Financing

CareCredit's promotional financing offers are typically advertised in one of three ways and the less specific the headline, the fewer disclosure requirements apply. When deciding which type of advertisement to choose, consider the space available for your advertisement, the level of details available and the entire consumer experience. **In any event, before consumers commit to make a promotional financing purchase, the full offer details must ALWAYS be available to them in the channel they can make a purchase so they can make an informed decision whether to select the promotional financing for their purchase or not.**

Trigger Headline—Includes a “trigger” term as defined by Regulation Z that requires specific additional disclosures. Trigger terms include:

- Any reference to an APR, Interest Rate or No Interest
- No Annual Fee/No Foreign Transaction Fee
- Any reference to Minimum Interest Charge
- Any other finance charges like promotion/activation fees

If an advertisement includes a trigger term, the following information applicable to the program must be disclosed:

- Current APR(s),
- Any promotional, activation or annual fee, and
- Minimum Interest Charge

Combo Headline—No trigger terms, but a promotional period or time frame is included.

Generic Headline—No trigger terms, promotional period or timeframes are included in the headline.

EXAMPLES

- **No Interest if Paid in Full Within 12 Months**
- **17.90% APR for 12 Months Until Paid in Full**
- **No Annual Fee***

- **12 Month Promotional Financing Available**
- **Ask about 48 Month Special Financing**

- **Promotional Financing Available**
- **Special Financing Available**

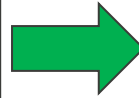


Best Practices when Advertising Deferred Interest Promotions

BACKGROUND

An easy-to-use guide was recently sent to health care providers to help explain deferred interest promotional financing in simple, everyday language. That guide explains 5 key concepts about deferred interest promotional financing that all employees should understand and be able to share with customers:

1. Deferred interest promotional financing is just as it sounds: when a customer uses this type of financing on a purchase, interest accrues (adds up) from the purchase date but is deferred to the end of the promotion period.
2. Deferred interest promotional financing DOES NOT mean deferred payments.
3. With deferred interest promotional financing, a customer must make minimum monthly payments.
4. The required minimum payment, shown on a customer's billing statement, will typically NOT pay off the full purchase within the promo period. A customer can choose to pay more every month to pay off the balance within the promo period and avoid paying interest.
5. If the customer doesn't pay off the purchase in full, by the end of the agreed-to promo period, then the interest that has accrued from the date of purchase WILL be added to the remaining balance.



BEST PRACTICES

Most CareCredit applications and terms and conditions include important details about deferred interest promotional financing.

In addition to the Regulation Z and UDAAP disclosure requirements, it is a best practice to also provide this important information about how deferred interest promos work to consumers by **including the QR Code or the link that accesses deferred interest promotional financing content in the following types of collateral, or any other collateral where such information would make sense:**

- ✓ **In provider office signs or posters from CareCredit that contain disclosures for deferred interest promotional financing**
- ✓ **In provider office customer brochures that cover credit and financing**
- ✓ **In provider office payment estimator tools, that must be provided or approved by Synchrony**
- ✓ **Partner's financing landing page**
- ✓ **Emails sent to consumers advertising deferred interest promotions**
- ✓ **Any CareCredit hosted site promoting deferred interest promotions**

Creating a Promotional Financing Ad

The examples throughout these Guidelines assume no promo fee or activation fee is required. Due to the complexity, always work with your Legal Marketing Partner to determine how to advertise offers when a promo fee or activation fee is required.



New Account APRs/Minimum Interest Charge – Trigger Term Disclosure

Use one of the following disclosures if an advertisement includes a trigger term, such as no annual fee or foreign transaction fee, and any trigger term promotional financing offer.

Choose one of the following options based on the card(s) you are advertising (PLCC, Mastercard or both). As of date of publication:

- Both cards: application via carecredit.com
- PLCC only: application via provider’s custom link, provider center, practice management software or by phone

Copy Content	Disclosure
When Advertising PLCC only	For New Accounts as of 5/30/24: Purchase APR 32.99%. Penalty APR 39.99%. Min Interest Charge \$2.
When Advertising MC only	For New Accounts as of 5/30/24: Purchase APR 32.99%. Penalty APR 39.99%. Cash APR 32.99% and 4% Fee (\$10 min). Bal Trans APR 32.99%, and 5% Fee (\$5 min). Min Interest Charge \$2. Foreign Trans Fee 3%.
When Advertising both PLCC and MC	For New Accounts as of 5/30/2024: Purchase APR 32.99%. Penalty APR 39.99%. Min Interest Charge \$2. CareCredit [Rewards] Mastercard: Cash APR 32.99% and 4% Fee (\$10 min). Bal Trans APR 32.99% and 5% Fee (\$5 min). Foreign Trans Fee 3%.

Text in [brackets] denotes **discretionary copy**. Update or remove text as applicable. **You must delete the brackets.**

Creating a Trigger Term Ad: FPRA Headline

TEMPLATE LANGUAGE – ALL CHANNELS (PRINT, ELECTRONIC, TV, RADIO)

FORMAT GUIDANCE

See [TV/Radio ad guidance](#).

Use one of these **Preferred Headlines** (as shown or each reversed in order. For example, the first example could alternatively be: Fixed monthly payments for XX months at XX.XX% APR)

Reasonable variation is allowed in font/color/size, provided that key terms of the offer are presented in an understandable way for consumers

[XX.XX%] APR with fixed monthly payments for [XX] months
[XX.XX%] APR with [XX] fixed monthly payments
Reduced [XX.XX%] APR and fixed monthly payments equal to [X.XX%] of promo purchase amount until paid in full.

OR

Choose one of the following **Other Main Headlines**

[XX.XX%]APR for [XX] Months
[XX.XX%]APR until [Month, Year]
[XX.XX%] APR until paid in full]

[Language in brackets is required but varies]. <Language in carats should be added as applicable>

Creating a Trigger Term Ad: FPRA Subheadline

TEMPLATE LANGUAGE – ALL CHANNELS (PRINT, ELECTRONIC, TV, RADIO)

FORMAT GUIDANCE

See [TV/Radio ad guidance](#).

Based on Reg Z requirements and material terms of the promotional offer create a Subheadline similar to the following. For Subheadline/Disclosure down payment language [click here](#).

[Standard Subheadline Guidance](#) applies.

OPTION 1 Subheadline Options for **Preferred Headline**

On qualifying purchases of [\$1,000/\$2,500] or more <after discounts> made with your CareCredit credit card <at enrolled provider locations and select retailers in the CareCredit network> <between date – date>.

OPTION 2 Subheadline for **Other Headline Options**

On qualifying purchases of [\$1,000/\$2,500] or more <after discount> made with your CareCredit credit card <at enrolled provider locations and select retailers in the CareCredit network> <between Date – Date>. Fixed monthly payments required for [XX] months.

OPTION 3 Subheadline (NOTE: May feature any/all of the promos listed below; you are not required to feature all.)

On qualifying purchases made with your CareCredit credit card [at enrolled provider locations and select retailers in the CareCredit Network]

Focus on purchase amount:	Focus on promo length:
<ul style="list-style-type: none"> Purchases of \$1,000 or more are eligible for a <ul style="list-style-type: none"> ✓ 24 months offer with a 17.90% APR ✓ 36 months offer with a 18.90% APR ✓ 48 months offer with a 19.90% APR 	<ul style="list-style-type: none"> 24 months offer with a 17.90% APR available on purchases of \$1,000+
	<ul style="list-style-type: none"> 36 months offer with a 18.90% APR available on purchases of \$1,000+
	<ul style="list-style-type: none"> 48 months offer with a 19.90% APR available on purchases of \$1,000+
<ul style="list-style-type: none"> Purchases of \$2,500 or more are eligible for a 60 months offer with a 20.90% APR 	<ul style="list-style-type: none"> 60 months offer with a 20.90% APR available on purchases of \$2,500+

Exception for Limited Space Situations

A truncated Subheadline can be used (1) in a limited space situation where the details are still provided in the same channel (not for TV/Radio) or (2) when a specific consumer experience is designed to require the details to be presented in the same channel before a purchase decision is required to be made.

- Online banner – A detail page with all non-truncated promo headline/subheadline/disclosure information must be provided one click away with the headline/subheadline immediately presented in the marketing copy, without any scrolling required.
- Print (not applicable to in office/retailer signs unless a brochure with the full promo details is readily available in the location) – A detail page with all non-truncated promo headline/subheadline/disclosure information must be provided in the same channel.

Since the information presented in the Subhead is deemed material terms of the promotional offer from a UDAAP perspective, even when use of a Truncated Subhead is allowed, it must still indicate to the consumer the following general concepts about the offer, as applicable:

- Any limited time nature of the offer (either with specific dates or the phrase Limited Time)
- The fact that not all purchases qualify for the offer, if applicable. This can be accomplished with language indicating the specific qualifying purchase or that there are product limitations to the offer. Examples: qualifying purchases, select items, qualifying merchandise, select [mattresses]
- That the offer requires use of a CareCredit credit card - by name or with specific card art.

Truncated Subheadline Example: [Limited Time on qualifying purchases with the CareCredit credit card. Fixed monthly payments required for \[XX\] months.](#)

The more specific information that can be included in the Truncated Subhead, the better.

Creating a Trigger Term Ad: FPRa Disclosure

TEMPLATE LANGUAGE – ALL CHANNELS (PRINT, ELECTRONIC, TV, RADIO)

FORMAT GUIDANCE

See [TV/Radio ad guidance](#).

Customize the Disclosure as applicable for how the promo works for the specific program using language similar to one of the following options. [Determine which option will be used to tie it to the headline.](#)

[Standard Disclosure Guidance](#) applies.

GENERAL DISCLOSURE THAT CAN BE USED FOR ANY CHANNEL

Interest will be charged on promo purchases at a reduced APR from the purchase date. Fixed monthly payments are required until paid in full and will be calculated as follows: [on 24-month promotions – 4.9876% of initial promo purchase amount; on 36-month promotions – 3.6605% of initial promo purchase amount; on 48-month promotions – 3.0377% of initial promo purchase amount or on 60-month promotion – 2.6997% of initial promo purchase amount.] The fixed monthly payment will be rounded up to the next highest [whole dollar][cent] and may be higher than the minimum payment that would be required if the purchase was a non-promo purchase. <Any discount will reduce your total purchase amount and may result in you not satisfying the minimum qualifying purchase amount required.> During the last month(s) of the promo period the required monthly payment may be reduced due to the prior months' rounding. Regular account terms apply to non-promo purchases. [[Insert New Account APRs and Min Interest Charge language](#).] Existing cardholders: See your credit card agreement terms. Subject to credit approval.

TRUNCATED DISCLOSURE for in practice/retailer sign when brochure is readily available with full disclosure:

The monthly payments are equal to [X.XXXX%] of initial total promo purchase amount and rounded up to the next [whole dollar][cent]. Regular account terms apply to non-promo purchases. [[Insert New Account APRs and Min Interest Charge language](#).] Existing cardholders: See your credit card agreement terms. See [insert exactly where in the location the brochure is available] for details. Subject to credit approval.

TV/RADIO AD DISCLOSURE ALLOWED due to limited time and space

Monthly payments equal [X.XXXX%] of promo purchase rounded to next highest [whole dollar][cent]. [[Insert New Account APRs and Min Interest Charge language](#).] Subject to credit approval. See [insert where] for details.

[Language in brackets is required but varies]. <Language in carats should be added as applicable>

Payment factor percentage, including the number of decimal places used must match exactly how the promotion calculates. Confirm with finance.

Creating a Trigger Term Ad: Deferred Interest Headline

TEMPLATE LANGUAGE – ALL CHANNELS (PRINT, ELECTRONIC, TV, RADIO)

FORMAT GUIDANCE

See [TV/Radio ad guidance](#).

Choose one of the following Main Headlines

- No Interest if Paid in Full within [XX] Months
- Zero Interest if Paid in Full within [XX] Months
- 0 Interest if Paid in Full within [XX] Months
- Deferred Interest if Paid in Full within [XX] Months

NOTE: 0% Interest **CANNOT** be used since interest accrues with this type of offer and is assessed if the promotional purchase balance is not paid in full within the promo period.

Font size and treatment must be the same for all language in the headline.

For CareCredit, “XX” = 6, 12, 18 and/or 24 Months.

Creating a Trigger Term Ad: Deferred Interest Subheadline

TEMPLATE LANGUAGE – ALL CHANNELS (PRINT, ELECTRONIC, TV, RADIO)

FORMAT GUIDANCE

See [TV/Radio ad guidance](#).

Based on Reg Z requirements and material terms of the promotional offer create a Subheadline similar to the following:

[Standard Subheadline](#)

For Subheadline/Disclosure down payment language [click here](#).

[Guidance](#) applies.

SUBHEADLINE THAT CAN BE USED FOR ANY CHANNEL

On <insert product limitations> purchases <of \$XXX or more> <after discounts> made with your CareCredit credit card <account> <between Date – Date> <at enrolled provider locations and select retailers in the CareCredit network>. Interest will be charged to your account from the purchase date if the promotional balance is not paid in full within the promotional period. Minimum monthly payments required.

BANNER/ENVELOPE EXCEPTION: The “Interest will be charged...” sentence is required by Reg Z unless a [banner or envelope exception exists](#). The other information above is deemed to be material from a UDAAAP perspective and therefore even when the Reg Z exception exists, the subheadline must still indicate, as applicable, any limited time nature of the offer, the fact that not all purchases qualify and what specific credit card must be used. For banners: A detail page with all non-truncated promo headline/subheadline/disclosure information and a link to the credit application must be provided one click away from the banner. For Direct Mail: A detail page with all non-truncated promo headline/subheadline/disclosure information and a credit application must be inside the envelope.

Example: [Limited Time on qualifying purchases with a CareCredit credit card](#).

[Language in brackets is required but varies]. <Language in carats should be added as applicable>

Creating a Trigger Term Ad: Deferred Interest Disclosure

TEMPLATE LANGUAGE – ALL CHANNELS (PRINT, ELECTRONIC, TV, RADIO)

FORMAT GUIDANCE

See [TV/Radio ad guidance](#).

Customize the Disclosure as applicable for how the promo works for the specific program using language similar to one of the following options. [Determine which option will be used to tie it to the headline](#)

[Standard Disclosure Guidance](#) applies.

GENERAL DISCLOSURE THAT CAN BE USED FOR ANY CHANNEL

<Insert any product or purchase limitations or restrictions that are not in the headline.> No interest will be charged on the promo balance if you pay it off, in full, within the promo period. If you do not, interest will be charged on the promo balance from the purchase date. <Any discount will reduce your total purchase amount and may result in you not satisfying the minimum qualifying purchase amount required.> The required minimum monthly payments may or may not pay off the promo balance before the end of the promo period, depending on purchase amount, promo length and payment allocation. Regular account terms apply to non-promo purchases and, after promo period ends, to the promo balance. [[Insert New Account APRs and Min Interest Charge language.](#)] Existing cardholders: See your credit card agreement terms. Subject to credit approval.

TRUNCATED DISCLOSURE for in practice/retailer sign when brochure is readily available with full disclosure:

Regular account terms apply to non-promo purchases and, after promo period ends, to the promo balance. [[Insert New Account APRs and Min Interest Charge language.](#)] Existing cardholders: See your credit card agreement terms. See [insert exactly where the brochure is available] for important details. Subject to credit approval.

TV/RADIO AD DISCLOSURE ALLOWED due to limited time and space

Interest will be charged to your account from the purchase date if the promotional balance is not paid in full within [XX] months. [[Insert New Account APRs and Min Interest Charge language.](#)] Subject to credit approval. See [insert where] for details.

[Language in brackets is required but varies]. <Language in carats should be added as applicable>

Creating a Combo Promotional Financing Advertisement

TEMPLATE LANGUAGE FOR ALL COMMUNICATION CHANNELS (PRINT, ELECTRONIC, TV, RADIO)

FORMAT GUIDANCE

See TV/Radio ad guidance.

Choose one of the following Main Headlines

XX Months <Promotional> Financing <Available>

XX Months <Special> Financing <Available>

If underlying Promotional Financing offer is one with promo terms that expire (such as Deferred Interest), then the word Promotional or Special must be included in the headline. Why is that? Unlike FPRA offers, these promotions are not structured to pay off the purchase within the specific promo period.

Reasonable variation is allowed in font/color/size.

Based on the material terms of the promotional offer, create a Subheadline similar to the following:

On <insert product limitations> purchases <of \$XXX or more> <after discounts> <after down payment> made with your CareCredit credit card <at enrolled provider locations and select retailers> in the CareCredit network>. <between Date – Date>.

Standard Subheadline Guidance applies.

Subheadline Exceptions (Not applicable to TV, Radio)

You do not need a subheadline (or you can use any part of the subheadline), if the CareCredit credit card is not mentioned.

Limited Space Situations: If the credit card is mentioned, A truncated Subheadline can be used (1) in a limited space situation where the details are still provided in the same channel (not for TV/Radio) or (2) when a specific consumer experience is designed to require the details to be presented in the same channel before a purchase decision is required to be made.

- Online banner – A detail page with all non-truncated Combo or Trigger Terms headline/subheadline/disclosure information must be provided one click away with the headline/subheadline immediately presented in the marketing copy, without any scrolling required.
- Print (not applicable to in practice/retailer signs unless a brochure with the full promo details is readily available in the location) – A detail page with all non-truncated Combo or Trigger Terms headline/subheadline/disclosure information must be provided in the same channel.

A truncated subhead must still indicate to the consumer the following general concepts about the offer, as applicable:

- Any limited time nature of the offer (either with specific dates or the phrase Limited Time)
- The fact that not all purchases qualify for the offer, if applicable. This can be accomplished with language indicating the specific qualifying purchase or that there are product limitations to the offer. Examples: qualifying purchases, select items, qualifying merchandise, select [mattresses]
- That the offer is tied to use of a CareCredit credit card - by name or with specific card art.

Truncated Subheadline Example: Limited Time on qualifying purchases with a CareCredit credit card.

Customize the Disclosure as applicable and determine which option will be used to tie it to the headline

Subject to credit approval. Minimum monthly payments required. See [insert where] for details.

Use a Trigger Term headline/subheadline/disclosure as the combo disclosure if you cannot confirm that a retailer can present the details of the offer prior to a consumer making a purchase.

Standard Disclosure Guidance applies.

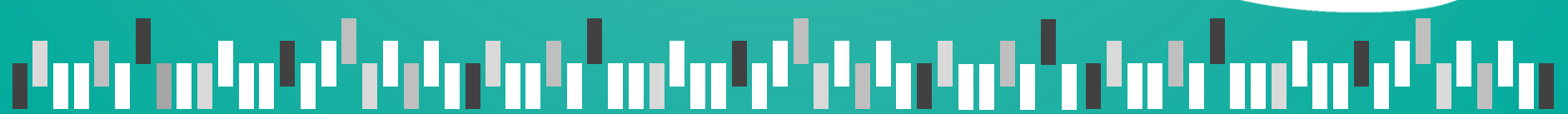
[Language in brackets is required but varies]. <Language in carats should be added as applicable>

Creating a Generic Promotional Financing Advertisement

TEMPLATE LANGUAGE – ALL CHANNELS (PRINT, ELECTRONIC, TV, RADIO)	FORMAT GUIDANCE
<p>Choose one of the following Main Headlines Promotional Financing Available Special Financing Available Financing Available</p> <p>Disclosure depends on if the program credit card name or image is shown in the ad.</p> <p>If underlying offer is a Promotional Financing offer with promo terms that expire (Deferred Interest), then the word Promotional or Special must be included in the headline. Why? Unlike FPRA financing offers, these promotions are not structured to pay off the purchase within the specific promotional period.</p>	<p>See <u>TV/Radio ad guidance</u>.</p> <p>Reasonable variation is allowed in font/color/size</p>
<p>Subhead: Not required</p>	
<p>Disclosure: Option 1: If the credit card name or image is not mentioned or shown in the advertisement, then you can simply direct the consumer where to get information. *See [where] for details.</p> <p>Option 2: If the credit card name or image is mentioned or shown in the advertisement, use this disclosure. Subject to credit approval. See [where] for details.</p>	<p><u>Standard Disclosure Guidance</u> applies.</p>
<p>[Language in brackets is required but varies]. <Language in carats should be added as applicable></p>	

See the Appendix for examples of preapproved Generic Headlines

**Provider/Retailer
Benefits/Requirements That May
Impact a Promotional Financing Offer**



Provider/Retailer Benefits/Requirements that may impact a Promotional Financing Offer

Promotional Financing Offers may be impacted by provider/retailer specific requirements or benefits, both of which must be considered when creating an advertisement. Two common types of these are shown below, although similar analysis can be used for other provider/retailer requirements and benefits.

PROVIDER/RETAILER BENEFITS

If a provider/retailer wants to advertise a benefit such as **No Down Payment**, how this is presented and disclosed depends on the interplay of the benefit with the use of a CareCredit credit card.

1. If the consumer only gets the benefit if they use the CareCredit credit card – The headline and/or subheadline must clearly indicate that the offer requires use of the credit card. If additional restrictions or limitations are applicable with the offer, those must be included in the CareCredit credit card disclosure.
2. If the consumer gets the benefit with any form of payment – The headline and/or subheadline must clearly indicate (with words or visually) that the offer does NOT require use of the credit card. If additional restrictions or limitations are applicable with the offer, those disclosures should be provided separately from any CareCredit related ones.
3. If the consumer cannot get the benefit if they use a CareCredit credit card – The benefit must be presented separately from the CareCredit offer with the headline and/or subheadline clearly indicating that the offers are separate, and language should be added to the CareCredit offer disclosure that reads similar to the following: “No down payment is not available if the purchase is made with your CareCredit credit card.”

Although the example above refers to No Down Payment, the issues that must be considered are the same when advertising any other type of provider/retailer benefit or requirement in an ad that also features a CareCredit credit card promotional financing offer. For example, if the provider/retailer offers “**Free Shipping or Delivery**”, first you must determine how that benefit is tied to use of the CareCredit credit card. If the card must be used to get the benefit (like scenario 1 above), then in addition to clearly indicating that the benefit requires use of the credit card, any restrictions or limitations associated with that offer must also be communicated. Some common limitations that may be included in the advertisement of any Free Shipping or Delivery offer are the type of shipping included, location restrictions and/or limitation on the size or type of merchandise that qualifies. One factor that should be used to determine whether this information is included in the subheadline or disclosure is how important this limitation is to the provider’s/retailer’s typical client/customer. For instance, if free shipping is restricted to an area within 10 miles of each provider’s/retailer’s location, and there is data supporting that 95% of past deliveries were within 10 miles, then perhaps including a statement of the restriction in the disclosure is sufficient. However, if data indicates that only 30% of past deliveries were within 10 miles of each location, then communication of that restriction in the subheadline may be required.

PROVIDER/RETAILER REQUIREMENTS

Alternatively, a provider/retailer may require a down payment for a purchase that also is eligible for a promotional financing offer. These circumstances are more complicated, and you must address the following questions before the advertising language is determined:

- Can the CareCredit credit card be used to make the down payment?
- If the CareCredit card can be used, is there a promotional financing offer that is applicable for the down payment? (e.g., is the down payment \$200+)
- Does the down payment impact any purchase threshold required for the promotional financing offer if it is not allowed to be charged on the card? What about if it is allowed to be charged on the card but is rung as two separate purchases?

Due to the complexity of these issues, always work with your Legal Marketing Partner to determine how to advertise these offers.

Monthly Payment Advertising



Reg Z - Monthly Payment Advertising Requirements

If an advertisement for credit to finance the purchase of goods or services specified in the advertisement states a monthly payment amount, the advertisement must also state the total of payments and the time period to repay the obligation, assuming that the consumer pays only the periodic payment amount advertised. **The total of payments and the time period to repay the obligation must be equally prominent to the statement of the periodic payment amount.**

- Same font size would satisfy the “equally prominent” requirement for this section. Color variation is allowed.

CATALOG AND ELECTRONIC AD EXCEPTIONS

(1) If a catalog or other multiple-page advertisement, or an electronic advertisement (such as an advertisement appearing on an Internet Web site), gives information in a table or schedule in sufficient detail to satisfy the monthly payment disclosures required by the paragraph above, it shall be considered a single advertisement if:

- (i) The table or schedule is clearly and conspicuously set forth; and
- (ii) Any statement of account opening terms appearing anywhere else in the catalog or advertisement clearly refers to the page or location where the table or schedule begins.

What this exception means:

- Allows creditors to put credit information together in one place in a catalog or other multiple-page advertisement or an electronic advertisement (such as an advertisement appearing on an Internet Web site) if there is a monthly payment or trigger term advertised.
- If an electronic advertisement contains the table or schedule permitted, any monthly payment and any statement of account opening terms appearing anywhere else in the advertisement must clearly direct the consumer to the location where the table or schedule begins. For example, the monthly payment or account opening term may be accompanied by a link that directly takes the consumer to the additional information.

The monthly payment, time period, and total payment amount MUST be in the same font size

Reg Z and UDAAP Requirements - Monthly Payment Advertising (“FPRA”)

FPRA Offers		
	General Advertising Requirement for all channels	Allowable Exception ONLY for Multiple Page and Electronic Ads (not applicable to any other channel)
Regulation Z Equal Prominence Requirements	Display the required monthly payment, number of months to pay off the purchase and total cost (the “Three Numbers”) all on the same page in the same font size, unless a Risk Acceptance exists with alternative business guidelines.	<p>OPTION 1: Follow General Advertising Requirements</p> <p style="text-align: center;">OR</p> <p>OPTION 2: If all Three Numbers are not presented as stated in the General Advertising Requirements column, then provide the Three Numbers in a table/schedule presented:</p> <p>(i) On the same page or elsewhere for a multiple-page ad, OR</p> <p>(ii) One click away for an electronic ad.</p> <p>IMPORTANT:</p> <ul style="list-style-type: none"> • The font size of the Three Numbers in the table/schedule must be the same as, or larger, than the font size of the monthly payment in the ad AND • The location of the table/schedule must be clearly set forth on the page with the ad.
	OPTION FOR ANY CHANNEL: Comply with Business Interpretation of Equal Prominence as stated in the SYB M-P012 Advertising Surveillance Procedure .	
UDAAP Considerations	<ul style="list-style-type: none"> • Headline/Subheadline - Clearly and conspicuously connect the advertised monthly payment to the promotional financing offer and the credit card and indicate any date limitations to the offer that would impact the monthly payment. • Tie the monthly payment disclosure to the monthly payment • Disclosure - Include the following information in the monthly payment disclosure: <ul style="list-style-type: none"> ✓ Details of how the monthly payment is calculated ✓ Assumptions about when payments are made ✓ Information about what happens if there are other balances on the account 	
Sample Monthly Payment Disclosure	The estimated required monthly payment shown [which may exclude taxes and delivery] [which excludes taxes and delivery][which includes taxes and delivery]equals the [promotional purchase amount] [amount financed] multiplied by [x.xxx%], rounded to the next highest [whole dollar][cent]. During the last month(s) of the promo period the required monthly payment may be reduced due to this rounding. The sum of the required monthly payments will equal the cost of the amount financed. These payments apply only with the financing offer shown. If you make the required payments by the due date each month, you should pay off this purchase within the promo period, if it is the only balance you are paying off. If you have other balances on your account, this payment will be added to any other minimum monthly payments.	

Reg Z and UDAAP Requirements - Monthly Payment Advertising (Deferred Interest)

Deferred Interest Offers

	General Advertising Requirement for all channels	Allowable Exception ONLY for Multiple Page and Electronic Ads (not applicable to any other channel)
Regulation Z Equal Prominence Requirements	Display the “optional” or “suggested” monthly payment, number of months to pay off the purchase and total cost (the “Three Numbers”) on the same page in the same font size, unless a Risk Acceptance exists with alternative business guidelines. The word “optional” or “suggested” must be used.	<p>OPTION 1: Follow General Advertising Requirements OR</p> <p>OPTION 2: If all Three Numbers are not presented as stated in the General Advertising Requirements column, then provide the Three Numbers in a table/schedule presented:</p> <ul style="list-style-type: none"> (i) On the same page or elsewhere for a multiple-page ad, OR (ii) One click away for an electronic ad. <p>IMPORTANT:</p> <ul style="list-style-type: none"> • The font size of the Three Numbers in the table/schedule must be the same as, or larger, than the font size of the monthly payment in the ad AND • The location of the table/schedule must be clearly set forth on the page with the ad.
	OPTION FOR ANY CHANNEL: Comply with Business Interpretation of Equal Prominence as stated in the SYB M-PO12 Advertising Surveillance Procedure .	
UDAAP Considerations	<p>•Headline/Subheadline - Clearly and conspicuously connect the advertised monthly payment to the promotional financing offer and the credit card and indicate any date limitations to the offer that would impact the monthly payment.</p> <p>•Important Information - Include the following information in a clear and conspicuous manner (for print, on the same ad) and in close proximity to the location of where the Three Numbers are presented in the same font size:</p> <ul style="list-style-type: none"> ✓ That the monthly payment is a suggested or optional amount and higher than the required payment that is billed ✓ An explanation of how the monthly payment shown is calculated ✓ That the monthly payment advertised will only pay off the purchase within the promo period if there are no other balances on the account during the entire promo period and all payments are made on time ✓ That if the promotion is not paid off within the promo period, interest will be charged back to the purchase date and the person will pay more than the price of the advertised item (which was disclosed as the total payments). 	
Sample Monthly Payment Important Information when advertising only a suggested monthly payment.	<p>The Suggested Equal Monthly Payment shown [which may exclude taxes and delivery] [which excludes taxes and delivery][which includes taxes and delivery]may be greater than the required minimum monthly payment that will be on your billing statement when you use the [X] month promotional financing offer.</p> <p>This estimated payment:</p> <ul style="list-style-type: none"> • Equals the [promotional purchase amount] [amount financed] divided by [x] rounded to the next highest [whole dollar][cent]. • Would pay off the [promotional purchase amount][amount financed] within [X] months, but only if there are no other balances on your account at any time during the [X] month promotional period and you make your payments on time. Your total payments will equal the amount of the [promotional purchase amount][amount financed]. <p>If the [promotional purchase amount][amount financed] is not paid in full within [X] months, interest will be charged to your account from the purchase date and your total payments will be greater than the amount of the [promotional purchase amount][amount financed].</p>	

Electronic Product Page Options for Monthly Payments with a Combo Headline

	Fixed Pay/Reduced APR	Deferred Interest
Monthly Payment (assuming the purchase price is also on the product page)	\$38/Month [\$38/mo.]	\$38/Month [\$38/mo.] [\$38] If the word Month or mo. is included, then you can delete “monthly” below.
Fact that it is only suggested	N/A	Suggested [monthly] payments The word “monthly” can be removed if you use “month” or mo, when stating the actual payment
Time period to pay and/or Fact that a specific special financing offer must be used	With ##-month financing	With ##-month special financing
Fact that a specific credit product must be used	With your CareCredit credit card Can show card art or not refer to credit card at all and rely on information one click away	
Dates of Offer	<p>If an everyday offer - No date language is required</p> <p>If a limited time offer and:</p> <ul style="list-style-type: none"> • Card Art/Name is shown – Either include (1) dates of offer or (2) an indication of limited time period, with specific dates in marketing copy one click away. • Card Art/Name is not shown – Date of the offer can be provided as stated above or only in marketing copy one click away. If Retailer does not provide date in ad and keeps the ad up when it is not available, they will need to honor the offer. 	
Hyperlink Label Hyperlink must go directly to a page with equal prominence satisfied (if not satisfied on the product page), monthly payment disclosure and specific promo details. Also, if the credit card or specific date limitations of the offer are not presented on the product page, then that information must be clearly presented in the marketing copy on the linked page.	<p><u>Important monthly payment information</u></p> <p>OR</p> <p><u>Important mo. payment info.</u></p> <p>OR</p> <p><u>Learn How; Show How; See How</u></p>	

Print Advertisement Options for Monthly Payments with a Combo Headline

	Fixed Pay/Reduced APR	Deferred Interest
Monthly Payment (assuming the purchase price is also on the product page)	\$38/Month [\$38/mo.]	\$38/Month [\$38/mo.] [\$38] If the word Month or mo. is included, then you can delete “monthly” below.
Fact that it is only suggested	N/A	Suggested [monthly] payments The word “monthly” can be removed if you use “month” or mo, when stating the actual payment
Time period to pay and/or Fact that a specific special financing offer must be used	With #-month financing	With #-month special financing
Fact that a specific credit product must be used	with your CareCredit credit card Can show card art or not refer to credit card at all and rely on information being included on the page with all the details.	
Dates of Offer	If an everyday offer -No date language is required If a limited time offer and: <ul style="list-style-type: none"> • Card Art/Name is shown – Either include (1) dates of offer or (2) an indication of limited time period, with specific dates in marketing copy on the full details page. • Card Art/Name is not shown – Date of the offer can be provided as stated above or only in marketing copy on the full details page. 	
<p>Redirect Language For catalog and multi-page collateral, redirect must go to a page with equal prominence satisfied (if not satisfied on the same page with the monthly payment); for all other print, equal prominence must be satisfied on the same page as the monthly payment.</p> <p>For all print: the full details page must include monthly payment disclosure and specific promo details. Also, if the credit card or specific date limitations of the offer are not presented in the offer, then that information must be clearly presented in marketing copy on the full details page.</p>	<p>See page x for important monthly payment information OR See page x for important mo. payment info. OR See page x to Learn How</p>	

UDAAP – Non-Promotional Financing Offers

UDAAP (Unfair, deceptive or abusive acts or practices)

- UDAAP
- Acquisition Offers
- Loyalty Programs



UDAAP - Material terms of Non-Promotional Financing That Impact Subhead

When advertising a Non-Promotional Financing offer, address general UDAAP considerations: material term of the promotion must be included in a clear and conspicuous manner in the subhead. This list provides some common considerations but others may exist and should be addressed as applicable to the offer. Deviation from this guidance will be considered based on consumer experience, only after consultation with the legal marketing team.

QUESTIONS TO ADDRESS	CONSIDERATIONS
What specific transactions qualify for the offer?	<ul style="list-style-type: none"> • Are there only specific merchandise categories that qualify or purchase thresholds that qualify for the offer? If so, then state what those are or use the words, “qualifying” or “select” as allowed. • If “every, all, any and entire” appear in the marketing headline, are there any exceptions to the offer? If only gift cards are excluded, then the words “every, all, any, etc.” can be used provided the gift card exception is stated in the disclosure since it is typical in the market to exclude gift cards from offers so should not negatively impact a consumer’s expectations. If there are other exceptions either: remove any reference to “every” or to use “every, entire, or all” in the headline, then the exception must be included in the subheadline right below the headline (e.g., “10% Off your entire purchase (excludes [insert exclusions]). • If purchases in general qualify for the offer, but exclusions apply, may state exclusions apply in the subheadline or list exclusions in disclosure, depending on significance of the exclusions – such as the percentage of the sales that make up those excluded items • If only certain merchandise qualifies for the offer, confirm whether any other items purchased on the same sales receipt will also qualify for the offer or if they will be subject to different financing terms.
What credit card product(s) must be used for the offer?	Include an image of the credit card or the card name in text. If an image is used, its size and proximity must clearly indicate to a reasonable consumer that the credit card is required to get the promotion. If advertising both the Rewards Mastercard (“Dual Card”) and PLCC, the benefits associated with each product must be clearly identified. Mastercard benefits and disclosures must be stated accurately, inline with Network requirements.
Is the offer an everyday offer or only available during a specific time period?	Everyday Offers have no intended end date and therefore dates should not be included in the subhead. However, in order to reserve the right to discontinue the offer, include the following in the disclosure: We reserve the right to discontinue or alter the terms of this offer any time.
Is the offer automatic or does the consumer need to ask for it, present a coupon or code?	If the offer is not automatic, clearly communicate in subhead what consumers need to do, such as ask for it, present a coupon, input a code online, or any other activity.
How do returns impact the offer?	<p>Include the following language in the disclosure for any spend and get offers when there is a dollar threshold requirement during a set offer period.</p> <p>In order to qualify for this offer, you must make \$XXX in qualifying purchases (minus any returns or adjustments during the promotional period) between OFFER START DATE and OFFER END DATE.</p> <ul style="list-style-type: none"> • If the offer fulfillment is going to be net of returns and adjustments, include the parenthetical. • If the offer fulfillment will be calculated on gross sales, do not include the parenthetical.

UDAAP - Material terms of Non-Promotional Financing That Impact Subhead (PG 1)

When advertising a Non-Promotional Financing offer, address general UDAAP considerations: material term of the promotion must be included in a clear and conspicuous manner in the subhead. This list provides some common considerations but others may exist and should be addressed as applicable to the offer. Deviation from this guidance will be considered based on consumer experience, only after consultation with the legal marketing team.

QUESTIONS TO ADDRESS

CONSIDERATIONS

Is the offer limited to a one-time use?

Consumers must know if they can use the offer multiple times or just once. Also, it should be clear if the limitation applies to each cardholder on an account or at the account level.

Are there any minimum or maximum amounts that can be earned with the offer?

It is important for a consumer to understand any requirements and limitations on an offer.

If a purchase or other transaction is required to be made within a specific period of time, when exactly does that transaction need to be made?

Disclose exactly when a transaction needs to be made to qualify for an offer. If the transaction needs to be made online, add a time as well as a date if applicable.

Is the offer different by channel or for different cardholder populations or locations?

If the offer is different by channel, cardholder population or location, Fair Lending Tollgate approval is required. If different offers are in the market simultaneously, consider how they are advertised and how a consumer will understand which offer may be applicable to their purchase.

UDAAP - Material terms of Non-Promotional Financing That Impact Subhead (PG 2)

When advertising a Non-Promotional Financing offer, address general UDAAP considerations: material term of the promotion must be included in a clear and conspicuous manner in the subhead. This list provides some common considerations but others may exist and should be addressed as applicable to the offer. Deviation from this guidance will be considered based on consumer experience, only after consultation with the legal marketing team.

QUESTIONS TO ADDRESS	CONSIDERATIONS
<p>Are multiple offers available at the same time and if so, are they combinable?</p>	<ul style="list-style-type: none"> • Must be clear what the impact of one offer is on the other and whether the offers can or can't be combined. • If "plus" is used, then the advertised offer must be stackable with other offers. If multiple offers are in market that cannot be stackable then include "cannot be combined with other offers" or similar wording – or indicate clearly with OR when advertising multiple offers. • Typically, may occur with account opening offers and intersection with other value props on the card.
<p>How and when is the benefit applied to the person's account?</p>	<p>To appropriately set a consumer's expectations, disclose specifically when an advertised benefit will be provided. For instance, is it immediate at point of sale, on the next billing statement or within a certain number of days after earned or after the promotion is over. Also disclose how specifically the consumer will receive the benefit? Via a statement credit, reward certificate, cash back, or other form.</p>
<p>Are there any circumstances that could exist in the future that would not allow a consumer to get the benefit of the offer?</p>	<p>It is important to disclose to consumers the reasons why they may not get the benefit of an advertised offer even if they qualify for it. Some common reasons are if the consumer's account is closed, delinquent or otherwise not in good standing. It should be clear to a consumer what the exact circumstances are so their expectations are set and they are fully informed.</p>
<p>Is the use of "extra" or "bonus" accurate?</p>	<p>If "extra" or "bonus" is used there must be some benefit that the advertised offer is being added to or the offer must be better than or in addition to the existing offer.</p>
<p>Abbreviations Can abbreviations be used to address a limited space situation?</p>	<p>If abbreviations are used, they should be done in a limited manner and only as required. In addition, only common abbreviations should be used, which may include:</p> <ul style="list-style-type: none"> • ltd for limited • promo for promotional • mo for month or mos for months • pymts for payments are used, they should be done in a limited manner and only as required. In addition,

Acquisition Offers (a/k/a Account Opening Offers)



Acquisition Offer – Unique Considerations

- ❑ Any acquisition benefit must clearly be associated with opening the account **NOT applying** for the account. This means an advertisement could say: “Apply and if approved, get.... “ or “Open an account and get...”, but not “Apply and get...”
- ❑ **Headline and/or subheadline** must include all [material information](#), including typically:
 - Dates offer is available
 - Any applicable spend requirements
 - Whether use of the new CareCredit credit card account is required to get the offer
 - Exclusions (may state Exclusions Apply and list exclusions in disclosure, depending on significance of the exclusions – such as the percentage of the sales that make up those excluded items)
 - Where the account must be opened to qualify (in-office/select locations only or online)
 - Where the purchase needs to be made (in-practice/select locations only or online)
 - A description of how you get the offer (Ex. Coupon required; Enter Code XYZ; Ask for XX% off)
 - When the offer must be redeemed or is available (day account is opened, first purchase only, entire day’s purchase or date range)
 - Any maximum benefit that can be earned or other relevant restrictions

This list provides some common considerations but others may exist and should be addressed as applicable to the offer.
- ❑ A [truncated headline and/or subheadline](#) may be used in certain limited space situations.
- ❑ **Disclosures** need to include any additional terms, restrictions, exclusions and limitations.
- ❑ **Pended/Referred Accounts:** if an applicant is not approved instantly, a process must be in place that lets the applicant know what offer they will receive if approved as well as when, where and how they will receive it.
 - If the pended/referred offer is different: Applicants who do not receive a credit decision the day they apply, but are later approved, will receive [OFFER] coupon in their card carrier package.
 - If the pended/referred offer is same: “If you don’t receive a credit decision the day you apply, but are later approved, the coupon will be included in the card package.”
- ❑ **College Campus Advertising:** It is prohibited to offer a college student any tangible item to induce them to apply for a credit card if the offer is made on or near (within 1000 feet of) a college campus or at an event sponsored by or related to a college.

Acquisition Offer – Limited Space Exceptions

Limited Space Exceptions: (Not applicable to TV or Radio)

A truncated Subheadline can be used (1) in a limited space situation where the details are still provided in the same channel (not for TV/Radio) or (2) when a specific consumer experience is designed to require the details to be presented in the same channel before a purchase decision is required to be made.

- Online banners – A detail page with the full offer details including headline/subhead line/disclosure information must be provided one click away with the headline/subheadline immediately presented in the marketing copy, without any scrolling required.
- Print (not applicable to in practice/retailer signs unless a brochure with the full promo details is readily available in the location) – A detail page with the full offer details including the headline/subhead line/disclosure information must be provided in the same channel.

❑ Generic Headline Options

If there is only space to mention the benefit/offer (without any mention of the credit card), then no subheadline is required

Headline Example:

[Earn a \\$20 Statement Credit](#)

[\[GET DETAILS\]](#) [\[See page XX for details.\]](#)[\[Learn How\]](#)

❑ Truncated Subhead Option

A truncated subheadline is allowed with a headline but it must still indicate to the consumer the following general concepts about the offer, as applicable:

- Any limited time nature of the offer (either with specific dates or the phrase Limited Time)
- The fact that not all purchases qualify for the offer, if applicable. This can be accomplished with language indicating the specific qualifying purchase or that there are product limitations to the offer. Examples: qualifying purchases, select items, qualifying merchandise, select [Invisalign®], purchases of \$xxx or more, purchases more than \$xxx.
- The fact that a specific purchase is required to qualify for the offer
- That the offer is tied to use of a CareCredit credit card - by name or with card art.

Work with your Legal Marketing Partner to determine Headline and Subheadline options

Prequalification



Prequalification

A consumer-initiated preapproval engine that allows consumers to check on whether they may be approved for a CareCredit credit card prior to submitting an application.

Overview:

Designed to increase the number of applications, our easy-to-implement prequalification platform allows consumers to request to be prequalified while in-location or online. Responding to a practice/retailer sign, web banner or while visiting a practice/retailer website, the consumers provide basic personal information through the prequal UI where they are screened for a prequalified offer. After a soft credit check is completed, we notify the consumer of the outcome of the prequalification request at which point those that are prequalified have an opportunity to accept the offer and apply.

Consumer Benefits:

- Real-time prequalification check
- Ability to check for prequalified offers without impacting credit bureau score
- Credit available same-day when offer is accepted and approved
- When used with prefill capability, process is quicker and simpler (applies for Synchrony-hosted applications)

Partner Benefits:

- Prequalified credit applications may lead to more accounts and higher sales
 - Quick and seamless integration
 - Minimize negative consumer experiences that can lead to cart abandonment
 - Limit number of applications that could ultimately lead to credit denials
- See below for samples of approved text.*

If prequalified, you can [see] [view] your credit limit.

Check your eligibility for the CareCredit credit card risk-free, with no impact to your credit [bureau] score.



See if you prequalify for a CareCredit credit card

- Prequalifying does not affect your credit [bureau] score
- Get a decision in seconds
- If qualified, you can apply immediately

See if you prequalify

Get a decision in seconds with no impact to your credit [bureau] score

See if you prequalify

Loyalty Programs



Loyalty Programs

Advertising a Loyalty Program (such as the CareCredit Rewards Mastercard)

In addition to the [considerations applicable to any non-promotional financing offer](#), when advertising a loyalty program to prospective cardholders it is important to disclose the key terms and conditions of the program. When advertising a special offer associated with a loyalty program to existing cardholders, then the terms of that specific offer should be clear and conspicuous and a reference to the cardholder's rewards program terms should be included in the disclosure.

Every loyalty program has terms that clearly and completely describe all the loyalty program features, requirements and exclusions for the consumer. These may be formal loyalty program terms enclosed at the end of the credit card agreement, an addendum to the retailer's loyalty program or a comprehensive marketing disclosure provided consistently.

Some questions to address in loyalty program terms, as applicable, are shown below. This list provides some common considerations, but others may exist and should be addressed as applicable to the program.

Points and Certificates

- If certificates are issued as rewards, how many points/miles must a cardholder accumulate before a certificate is issued?
- Are certificates automatically issued when a pre-determined spend level or number of points/miles are earned? If so, what is that level?
- Is the number of reward certificates that will be issued at one time limited? If so, when are the remaining rewards issued?
- What can certificates be redeemed for and are there any exceptions?
- Do expiration dates apply to any aspect of the loyalty program?
- In any loyalty program, do the rewards expire? If so, under what circumstances?
- Are there any transactions that do not earn rewards?

Cash Back

- Are cash back rewards awarded on a monthly or annual basis?
- How is the amount of any cash back earned calculated?
- Is cash back awarded as a statement credit or checks redeemable for cash?

Returns

- Do our retail partners return policies affect consumers redeeming rewards certificates? If so, how?

General

- Does the language in the advertisement match the rewards program terms?

MCC Codes

- What MCC codes reflect the specific categories of transactions that may earn different levels of rewards?

Loyalty Programs

Headline Considerations

- ❖ Headlines should be accurate and not overstate the benefit that may be earned. For instance, if the positioning is “One point for every dollar of merchandise purchased”, but exclusions apply, then depending on the extent of those exclusions, they must be prominently disclosed or the headline advertising the program may need to be changed. Also, if the reward amount depends on making a purchase in a specific category, then that should be accurately described, and not overstated, based on the MCC codes used to fulfill the offer.
- ❖ If advertising the loyalty program in a different way than the terms envision, such as % back in rewards versus number of points earned, need to ensure that consumers will be able to understand the offer.

Providing Terms

- ❖ A broad statement may be made on a practice/location banner or sign (without the details of the loyalty program) provided the banner or sign refers the consumers to the underlying terms, such terms are available in the location, and consumers will receive the underlying terms before applying for the credit card.
- ❖ Customers should be provided the full loyalty program terms or a comprehensive summary before they apply for a credit card product.
- ❖ Abbreviated terms for prospective cardholders may be appropriate if consumers have access to the full terms or comprehensive summary before they are required to make a decision.
- ❖ A reference to the loyalty program terms may be sufficient for existing cardholders, if only the standard benefit is being touted.

ORB and Fulfillment

- ❖ Confirm the rewards system or the COPS fulfillment instructions are consistent with the offer disclosures.
- ❖ Include ORB in the development of, change to, and promotion of any loyalty program

Loyalty Program Changes or Termination. Contact your Commercial Counsel and Legal Marketing Team Partner.

- ❖ Favorable Changes - consumers notice may not be required (though it is usually desired).
- ❖ Unfavorable Changes – Generally, advance consumers notice is required and should be determined in conjunction with the Commercial Counsel for the program. Notice to existing cardholders may be provided via billing statements or other channels. For prospective cardholders, ensure applicants understand the loyalty program at the time they apply and any upcoming changes. A change to a program that calculates rewards on an annual basis should be made effective on the anniversary date of the program.

When developing, changing or terminating a Loyalty Program, always engage with your Commercial Counsel first to confirm terms and requirements.

Channel Considerations

- [Helpful Links](#)
- [Electronic Ads](#)
- [TV or Radio Ads](#)



Helpful Links

[Data & Third-Party Guidelines](#)

[Social Media Guidance](#)

[Endorsement Guidelines](#)

[Spend & Get Guidelines](#)

[Email Job Aid](#)

[Card Backer Template](#)

[Prequalification](#)

[Mobile Wallets](#)

Electronic Ads: FTC.com Guidelines

BASIC PRINCIPLES

- Required disclosures must be clear and conspicuous - consider the disclosure's placement and its proximity to the claim
- If it is not possible to make a required disclosure clearly and conspicuously, then that ad should not be disseminated

HOW TO MAKE A DISCLOSURE CLEAR AND CONSPICUOUS

- ✓ Place the disclosure as close as possible to the triggering claim.
- ✓ Consider the various devices and platforms consumers may use to view advertising and any corresponding disclosure.
- ✓ When a space-constrained ad requires a disclosure, incorporate the disclosure into the ad copy whenever possible. It may be acceptable to use a hyperlink and make the disclosure clearly and conspicuously on the page to which the ad links.

When using a hyperlink to lead to a disclosure

- Make the link obvious (e.g., “hyperlink treatment” such as underlined, different color font)
- Label the hyperlink appropriately to convey the importance, nature, and relevance of the information it leads to (e.g., “Important Details”, “Learn More”, etc.)
- Use hyperlink treatment consistently, so consumers know when a link is available
- Place the hyperlink as close as possible to the relevant information it qualifies and make it noticeable
- Take consumers directly to the disclosure on the click-through page (literally “one click away”)
- Assess the effectiveness of the hyperlink by monitoring click-through rates and other information about consumer use and make changes accordingly

Design advertisements so that “scrolling” is not necessary in order to find a disclosure, if possible. When scrolling is necessary, use text or visual cues to encourage consumers to scroll to view the disclosure. Scrolling should be vertical, not horizontal.

If a product or service promoted online is intended to be (or can be) purchased from “brick and mortar” locations or from online retailers other than the advertiser itself, then any disclosure necessary to prevent deception or unfair injury should be presented in the ad itself — that is, before consumers head to the location or some other online retailer.

Electronic Ads – General Guidance

GENERAL GUIDANCE

ELECTRONIC ADS

If promotional financing or any other offer associated with a specific CareCredit credit card is being touted on a provider's/retailer's website, then the consumer should be able to take advantage of the offer online or it should be clear that is not the case. If the promotional purchase can be made online, then the consumer should have access to the full terms of the offer before they make the purchase so that they are able to make an informed decision.

EMAIL COMMUNICATIONS

- ✓ All the links in the communication must work
- ✓ Linked pages must be reviewed for all ads
- ✓ Required disclosures/supporting information must be one click away or at the bottom of the email
- ✓ Subject lines must accurately communicate the content of the email, be true statements and be submitted with the email for legal review.
- ✓ Emails sent by Synchrony Bank should have the appropriate servicing or marketing footer – See the applicable job aide. Note – for servicing emails, marketing content cannot comprise more than one third of the overall email content and cannot be more prominent than the servicing content.

- **Prominently display disclosures so they are noticeable to consumers. Evaluate the size, color, and graphic treatment of the disclosure in relation to other parts of the ad and webpage.**
- **Evaluate the entire ad to assess whether the disclosure is effective in light of other elements (text, graphics, hyperlinks, or sound) that might distract consumers' attention from the disclosure or makes it difficult for a reader to locate.**
- **Consider General Guidance above.**

TV or Radio/Broadcast Ads

Visuals

- Marketing copy (and disclosures) cannot be obscured by graphics, shading, coloration or other ways and must be displayed so a consumer can reasonably see and read the information.

Audio

- Whether via radio, television or other broadcast, any required information (including disclosures) must be given at a speed and volume sufficient for a consumer to hear and understand them.
- Speed and volume should be similar to the rest of the commercial content.

Additional Guidance

- Properly disclosing financing promotions in TV and radio advertisements is challenging due to the time limitations associated with these media. The announcement of the promotion must not create a misleading impression and essential information about the promotion must be disclosed.
- For TV ads, a combination of audio and visual disclosures should be allowed, as long as the consumer is aware of the material requirements, restrictions and limitations of the offer being advertised and any specific formatting requirements are followed (such as equal prominence).
- Abbreviated copy may be used (as shown in these Guidelines), provided all the required disclosures are made in a clear and conspicuous manner, and are available to a consumer prior to the purchase.

Small and Large Format Advertising

Advertising promotional financing is discouraged for items either too small, or with too simple of a format to support the required headline, subhead and supporting disclosure.

Generic advertising headlines are recommended.


Types of advertising this applies to:

- Buttons
- T-shirts
- Door Decals
- Stickers
- Price Tags
- Banners
- Billboards

Examples are illustration only.
Work with your LMP to provide specific offer language based on the offer and collateral type.



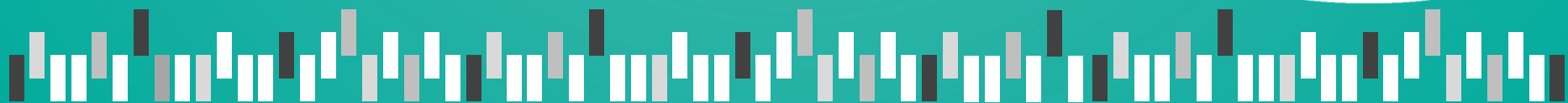
Promotional Financing Available*



*Subject to credit approval. Ask us for details.

(i.e., banner/sign)

Unique Marketing Campaigns



Unique Marketing Campaigns

AS LOW AS ADVERTISING: “As low as” language is strongly discouraged in conjunction with monthly payment advertising since the monthly payment should be *specific* to the product advertised. One way to utilize this language is to associate it with the purchase price and then specify the monthly payment applicable to the price of the item advertised.

COMMERCIAL CO-VENTURES: A commercial co-venturer is a for-profit company that advertises that all or part of the proceeds from a sale will go to or be used for any charitable purpose or organization. Commercial co-venturers are regulated in most states by the attorney general. The requirements include Registration/Bonding, Contract, Recordkeeping, Filing and Disclosures. [Contact the legal Co-Venturer counsel](#) if your campaign includes this type of advertisement.

FREE: Care must be taken in using the word “free” or similar terms (such as “no cost” or “gift”). If something is offered free, it must actually be free. Additionally, all terms and conditions for receiving the “free” offer must be stated in the text of the offer.

ITAs: An ITA is an invitation to apply sent to a consumer that is not a firm offer of credit and must not look like one. It should clearly convey how a consumer can apply for the credit card being advertised and what, if any, unique benefits are being provided if a specific application channel is required to be used.

PRESCREENS: Prescreened (and Quickscreened) solicitations are firm offers for credit of products that are targeted to individuals based on pre-defined selection criteria obtained from consumer reporting agencies (including from our prospect database). If post-screening is involved, the criteria must be identical to or more lenient than the criteria used for prescreening.

Disclosures: Consult [Prescreen Template on the Legal Site](#). Card Docs counsel and CSS must review and approve the offer since rate and fees of the specific credit card are included. Pre-approved solicitations must also include the disclosures required by the Fair Credit Reporting Act.

Fair Lending: If a prescreen offer is different than what is in the market in general, it must go to Marketing/Fair Lending Tollgate.

Acceptance Channel: When developing a prescreen offer, always consider which acceptance channels are reasonable for the specific retailer.

Approval Rates: Synchrony targets a minimum approval rate of 85% for consumers who respond to prescreened solicitations that are not called “preapproved”. When the term “preapproved” is used, the minimum approval rate should be at least 90% to avoid unfair/deceptive practices claims. Percentages exclude fraudulent, incomplete or unverifiable applications and applicants that fail to meet the ability to pay.

Unique Marketing Campaigns

REBATES: If an offer is provided in the form of a rebate that requires a redemption form to be submitted by the consumer, then federal and state laws need to be complied with including requirements applicable to advertising and processing the rebate as well as information on the redemption form. Refer to the rebate CTC for these and other specific requirements that need to be addressed with these types of campaigns.

REISSUES: Whenever a reissue is being considered, the Health and Wellness General Counsel must be consulted with and approve the basis for the reissue and the population of cardholders that will be included/excluded from the reissue. See the [Reissue Procedure available on the Legal Site](#). Any reissue card carrier package must include the required “replace and destroy” language: “This card replaces your existing CareCredit credit card. Please destroy your existing card.”

SWEEPSTAKES/CONTESTS: If an offer includes a sweepstakes, review the [Sweepstakes Guidelines on the Legal Site](#) and engage the Sweepstakes counsel at the beginning of the process since Sweepstakes typically take significantly longer to implement than other marketing campaigns.

TRADEMARKS: Ensure any new slogans/branding being used in an ad is checked for trademark with IP counsel. If specific third-party brand images/logos are displayed (e.g., Google Play, Apple Pay, etc.) it must be confirmed that permissions and/or required disclosures are included per the brand guidelines of such third party. Refer to [Data and 3rd Party Guidelines on the Legal Site](#).

UP TO ADVERTISING: If “up to” is used in offers (promo financing or otherwise) and there are tiers to the same offer, then a description of each tier must be set forth in the subheadline (or in a multi page print catalog, on another page referenced in the “up to” ad), or online one click away. For in practice/retailer signs, generally the subheadline with tiers must be on the sign, although if a brochure is readily available in the location, may be able to rely on that brochure provided it is referenced on the sign. For TV/Radio ads, provide tiers via that channel, clearly and conspicuously (in subheadline or spoken). Work with Legal Marketing Team for any specific requests. If a promo financing offer with a trigger term uses “up to”, then there must be at least one other promo financing offer available of the same type and communicated as stated above. However, “up to” cannot be used with a Deferred Interest trigger term headline. When “up to” is used in a headline, the subheadline requirements associated with the offer still apply.

UPGRADES – Flipping accounts from a private label credit card account to a dual card account is deemed an upgrade since the dual card account will have equal or better rates and more benefits, features and functionality than the private label credit card account. The upgrade process is generally done for a large group of cardholders and requires sending a change in terms notice. Accounts inactive for 24 months are not eligible. Business should work with the appropriate marketing team with upgrade expertise before initiating such a campaign.

Appendix

- [Glossary](#)
- [Endorsements and Testimonials](#)
- [Quick Reference Promo Disclosure Summary](#)
- [Generic Headline Inspiration](#)
- [TV/Radio Advertising](#)
- [Advertising Examples \(including Monthly Payment Ads\)](#)
- [Mastercard Requirements](#)
- [Change Control](#)



GLOSSARY

Advertisement according to Regulation Z means a commercial message in any medium that promotes, directly or indirectly, a credit transaction. Only commercial messages that promote consumer credit transactions requiring disclosures are advertisements. Messages inviting, offering, or otherwise announcing generally to prospective cardholders the availability of credit transactions, whether in visual, oral, or print media, are covered by Regulation Z.

Annual percentage rate (APR) is the finance charge rate that is or may be imposed by a creditor on a balance over the period of a year.

Apply A single-step consumer-initiated application for credit that generates a hard hit on their credit bureau whether they are approved or declined.

Available credit is the unused portion of a revolving **credit** account's total **credit** limit.

Banner ads generally mean small rectangular image-based ads that typically have limited space for words, but which link to a marketing page with a full advertisement.

Clear and Conspicuous generally means presenting information in a manner that is difficult to miss and easily understandable by an ordinary consumer. For UDAAP-related material terms, this goal may be accomplished by including the information in the marketing copy, such as a subheadline, although there may be other ways to meet this objective depending on the specific customer experience. Certain Regulation Z information, that is required to be provided in a clear and conspicuous manner, may have more specific formatting and placement requirements as stated throughout these Guidelines.

Credit card means any card, plate, or other single credit device that may be used from time to time to obtain credit.

Credit limit is the maximum **amount** of **credit** that a lender will extend to a debtor for a particular **line** of **credit**.

Electronic Advertisement means a communication online in any form, including but not limited to ads on the internet, in emails, social media, and within apps

Interest is the cost of borrowing money.

GLOSSARY

Introductory Rate or Fee means a promotional rate or fee offered in connection with the opening of an account.

ITA 1.5 is a single-step consumer-initiated application for credit that generates a hard hit on their credit bureau when they are approved and a soft hit when they are declined. Currently available for PayPal Credit, PayPal Co-Brand, and Venmo portfolios only.

Prequalification is a two-step consumer-initiated process that allows consumers to check for credit offers they may be approved for prior to submitting an application. A consumer seeing if they prequalify will generate a soft hit on their credit bureau; a consumer who prequalifies, and then later applies, will generate a hard hit on their credit bureau. Consumers that do not prequalify will be sent an adverse action letter.

Prescreen A provider initiated process to determine if a consumer is preapproved for a credit product. A prescreen campaign is completed for multiple consumers at the same time. Consumers that are preapproved for credit must be notified of this “firm offer of credit;” consumers who are not preapproved do not need to be notified.

Promotional period means the maximum time period for which the promotional rate or promotional fee may be applicable.

Promotional rate means any annual percentage rate applicable to one or more credit card balances or transactions, which for a specified period of time is lower than the annual percentage rate that will be in effect at the end of that period on such balances or transactions.

Quickscreen/Batch Quickscreen A provider initiated process that screens known patients/clients and presents them with a preapproved credit offer when they come in for their appointment. As opposed to a prescreen campaign for many consumers at the same time, a quickscreen is done for a single or multiple consumers before the appointment. Consumers that are preapproved for credit must be notified of this “firm offer of credit;” consumers who are not preapproved do not need to be notified. Consumers who are preapproved but are not presented with an offer while they are in the provider’s office, must be sent the offer via alternative means (e.g., email or direct mail).

GLOSSARY

Regulation Z/TILA – Regulation Z is the regulation implementing the Truth in Lending Act (TILA) which promotes the informed use of consumer credit by requiring disclosures about its terms and costs.

Revolving Line of Credit (Open End Credit) is consumer credit extended by a creditor which: (i) The creditor reasonably contemplates repeated transactions; (ii) The creditor may impose a finance charge from time to time on an outstanding unpaid balance; and (iii) The amount of credit that may be extended to the consumer (up to any limit set by the creditor) is generally made available to the extent that any outstanding balance is repaid.

Trigger Terms are certain terms stated affirmatively or negatively in an advertisement for a credit card that trigger additional disclosures and include: No Annual Fee, Any statement of when finance charges begin to accrue or any grace period, and Charges imposed as part of the credit card program – including Finance Charges.

UDAAP refers generally to federal and state Unfair, Deceptive and Abusive Acts and Practices Laws. These laws apply to everyone, not just Synchrony Bank as the creditor, and require advertisements to fairly and accurately state the terms of the offer and not be false or misleading.

Endorsements and Testimonials

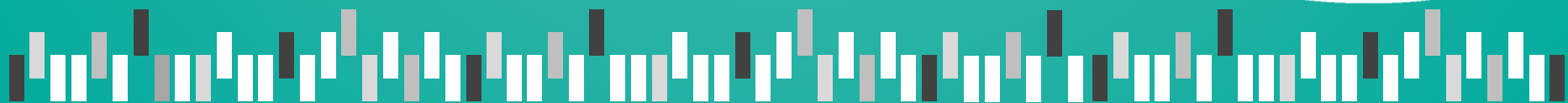
ENDORSEMENTS AND TESTIMONIALS

It is increasingly popular for advertisers to contract with professional **Influencers** to endorse/promote products and services. FTC guidelines also apply to consumer testimonials.

- ✓ **Honest** opinions, findings, beliefs and experience of the endorser: Endorser should not talk about experience they do not have or make claims they cannot personally prove.
- ✓ **Typical** experience and must be attributable to real consumers, or the fact that the results are not necessarily typical must be disclosed.
- ✓ Any **material connection** between the endorser and the marketer of a product. The relationship **must be disclosed** if it could affect how people evaluate the endorsement (e.g. payment, employee, etc.). In addition to posts/stories, tags, links & pins are all ways that influencers can endorse a brand:
 - **WHAT TO DISCLOSE**
 - Any financial (anything of value), employment, personal, or family relationship with a brand.
 - **HOW TO DISCLOSE:**
 - Place disclosures so they're hard to miss. Examples: Within a posted image, in “above the fold” text that's visible without clicking ‘more’. For video or live stream, disclosure should be repeated periodically to assure people who view only part of the video/steam will get the disclosure.
 - Use simple and clear language. Platforms are adding disclosure tools (e.g. “Sponsored”) but they may not be enough.

- **Follow the above guidelines carefully. The FTC has sent warning letters to companies and influencers who fail to follow the endorsement guidelines**
- **Disclosures 101 for Social Media Influencers (November 2019) available [here](#).**

Quick Reference Promo Disclosure Summary



DEFERRED INTEREST: 6, 12, 18 and/or 24 Months

TRIGGER TERM AD: DI

Additional Design Notes

HEADLINE OPTIONS

No Interest if Paid in Full within [X] Months*

Deferred Interest if Paid in Full within [X] Months*

Zero Interest if Paid in Full within [X] Months*

0 Interest if Paid in Full within [X] Months*

SUBHEAD

On qualifying purchases of \$200 or more made [after discount] with your CareCredit credit card [account at enrolled provider locations and select retailers in the CareCredit Network]. Interest will be charged to your account from the purchase date if the promotional balance is not paid in full within the promotional period. Minimum Monthly Payments required.

DISCLOSURE:

*No interest will be charged on the promo balance if you pay it off, in full, within the promo period. If you do not, interest will be charged on the promo balance from the purchase date. [Any discount will reduce your total purchase amount and may result in you not satisfying the minimum qualifying purchase amount required.] The required minimum monthly payments may or may not pay off the promo balance before the end of the promo period, depending on purchase amount, promo length and payment allocation. Regular account terms apply to non-promo purchases and, after promo period ends, to the promo balance. [Insert [New Account APRs and Min Interest Charge language.](#)] Existing cardholders: See your credit card agreement terms. Subject to credit approval.

- ✓ Text in [brackets] denotes **discretionary or variable copy**. Update or remove text as applicable. **You must delete the brackets.**
- ✓ You can **choose which promos to advertise** – just one or up to four – customize as needed.
- ✓ *Terms such as “0% Interest” or “Interest Free” **CANNOT** be used because interest accrues with this type of offer and is assessed if the promotional purchase balance is not paid in full within the promo period.*

FIXED PAY/REDUCED APR: 24, 36, 48 and/or 60 Months

TRIGGER TERM AD: FPRA

Additional Design Notes

HEADLINE/ SUBHEAD OPTIONS:

LEAD WITH THE PURCHASE THRESHOLD

or

LEAD WITH THE # MONTHS

Reduced APR and Fixed Monthly Payments Required Until Paid In Full*

On qualifying purchases made [after discount] with your CareCredit credit card [account at enrolled provider locations and select retailers in the CareCredit Network]:

- Purchases of \$1,000 or more are eligible for a
 - ✓ 24 months offer with a 17.90% APR
 - ✓ 36 months offer with a 18.90% APR
 - ✓ 48 months offer with a 19.90% APR
- Purchases of \$2,500 or more are eligible for a 60 months offer with a 20.90% APR

Reduced APR and Fixed Monthly Payments Required Until Paid In Full*

On qualifying purchases made [after discount] with your CareCredit credit card [account at enrolled provider locations and select retailers in the CareCredit Network]:

- 24 months offer with a 17.90% APR available on purchases of \$1,000+
- 36 months offer with a 18.90% APR available on purchases of \$1,000+
- 48 months offer with a 19.90% APR available on purchases of \$1,000+
- 60 months offer with a 20.90% APR available on purchases of \$2,500+

or

XX.90% APR for ## Months Until Paid In Full*

On qualifying purchases of [\$1,000/\$2,500] or more made with your CareCredit credit card [account] at enrolled provider locations [and select retailers] in the CareCredit Network.

*Interest will be charged on promo purchases at a reduced APR from the purchase date. Fixed monthly payments are required until paid in full and will be calculated as follows: [on 24-month promotions – 4.9876% of initial promo purchase amount; on 36-month promotions – 3.6605% of initial promo purchase amount; on 48-month promotions – 3.0377% of initial promo purchase amount or on 60-month promotion – 2.6997% of initial promo purchase amount.] The fixed monthly payment will be rounded up to the next highest whole dollar and may be higher than the minimum payment that would be required if the purchase was a non-promo purchase. [Any discount will reduce your total purchase amount and may result in you not satisfying the minimum qualifying purchase amount required.] During the last month(s) of the promo period the required monthly payment may be reduced due to the prior months' rounding. Regular account terms apply to non-promo purchases. [Insert New Account APRs and Min Interest Charge language.] Existing cardholders: See your credit card agreement terms. Subject to credit approval.

- ✓ Text in [brackets] denotes **discretionary or variable copy**. Update or remove text as applicable. **You must delete the brackets.**
- ✓ You can **choose which promos to advertise** – just one or up to four – customize as needed.

Generic Headline Inspiration



Approved Generic Headline Inspiration

Advertising headlines must be true statements. For example, “Buy now, pay later” is not true because it implies that a payment is not needed in the near future, when in fact minimum monthly payments are required for all purchases made with a CareCredit credit card. **Here are some pitfalls to avoid:**

- Promotional financing headlines that could be confused with installment or closed-end loan products
- Claims that cannot be substantiated (comparisons/superlatives, etc.)
- Advertising that implies consumers cannot afford to make their purchase without financing

NOTE: You can add a promotional period to the approved generic headlines shown making it a “Combo Headline”. In addition, the word ‘Financing’ can be used as a general reference to making a purchase with the credit card - not tied to a promotional financing offer. The disclosure for this type of use is simply ‘Subject to credit approval’.

Convenient financing options available*	Easy monthly payments make it simple.*	Promotional Financing Available*	Ask about the power of financing*	Open an account, shop, and pay your way.*
Special Financing Available*	Buy smart with financing*	Financing made easy.*	Ask About Special Financing*	Great Financing*
Fast, simple, smart financing available*	Smart financing makes it possible*	Financing with convenient monthly payments.*	Ask About Promotional Financing*	Dream big. Get it now with easy financing.*
Make it possible with financing*	Plan well, pay smart	Financing made simple*	Ask about financing options*	Take it home today
Financing with convenient monthly payments.*	Easy financing available* It’s quick and easy	Take time to pay. Special financing available now*.	The budget smart way to pay. Financing available*	Get a great deal and special financing.*
Special financing options with convenient monthly payments*	Fast and flexible financing options.*	Make it yours with these great financing offers.*	Make it yours with monthly payments*	Get it today(now) with financing*
Choose your way to pay -- financing available*	Make it yours with monthly payment*	No hassle financing is here.*	Enjoy special financing on our collection of...*	Buy now with smart financing*
Special financing options with convenient monthly payments*	Apply and buy today! (Cannot be combined with an offer)	<u>Click</u> for flexible financing.*	Now you can dream it and buy it with great financing options.*	Buying is easier than you think. Financing available*
Stretch your money, financing available*	Special financing can help you get it.*	Fast and flexible financing.*	Financing puts you in control*	CONTINUED ON NEXT PAGE

- When using any of these approved Generic Headlines – continue to follow the Generic Guidance.
- If converting any of these to a Combo Headline, then follow the Combo Guidance.
- If the underlying promotion is Deferred Interest, the use of ‘special’ or ‘promotional’ is required.

Approved-Generic Headline Inspiration (continued)

A few industry-specific examples to get the creative juices flowing

Get your new look with easy financing.*	Special financing can help you get the look you want.*	Stretch your budget with convenient monthly payments.*
Beautiful you, attractive financing*	Make it happen today with financing*	Upgrade your eyewear with great financing.*
Get extra sparkle with simple financing.*	Financing is just a <u>click</u> away.*	Get the look, and pay over time.*
Say I DO with special financing.*	Relax in style. Enjoy special financing.*	Easy financing makes it sound even better*.
More sparkle, more shine and special financing.*	You deserve it, we'll help.	The (insert product) you want with simple financing*.
Special financing can give you extra flexibility.*	Sleep well today with financing*	Music to your ears and budget*
New year (season), new look, easy financing!*	Sleep better with special financing.*	Play hard with easy financing*
Easy financing can make it look even better.*	Make the day extra special. Ask about financing!*	Spread payments over time*

- When using any of these approved Generic Headlines - continue to follow the Generic Guidance.**
- If converting any of these to a Combo Headline, then follow the Combo Guidance.**
- If the underlying promotion is Deferred Interest, the use of 'special' or 'promotional' is required.**

Radio/TV Ad Examples with Reduced Disclosures

Due to the limited amount of time within a radio or TV ad, it may not be possible to fully disclose the typical subhead and disclosure for trigger term promotional advertising. For this type of ad only, the adjustments shown below have been made to the language. In addition, [Reg Z allows a phone number to be used for certain TV and Radio Ad trigger term disclosures](#), although the APR must still be disclosed.

TRIGGER TERM PROMOTIONAL ADS

Example of *Fixed Payments/Reduced APR* Promotional or Radio/TV Ad

AUDIO/VISUAL:

...and now through [date], get [XX] Months fixed monthly payments at [X.XX]% APR on purchases of [Insert dollar or product limitation] with a CareCredit credit card.

DISCLOSURE

Monthly payments equal X.XXXX% of promo purchase rounded to next highest [whole dollar][cent]. [\[Insert New Account APRs and Min Interest Charge language.\]](#) Subject to credit approval. See [insert where] for details.

Example of *Deferred Interest* Promotional or Radio/TV Ad

AUDIO/VISUAL

...and now through [date], get No Interest if paid in full within [XX] Months on purchases of [Insert dollar or product limitation] with your CareCredit credit card. Minimum monthly payments required.

DISCLOSURE

Interest will be charged to your account from the purchase date if the promotional balance is not paid in full within [XX] months. [\[Insert New Account APRs and Min Interest Charge language.\]](#) Subject to credit approval. See [insert where] for details.

Review the entire ad to assess whether the disclosure is effective in light of other elements (text, graphics, hyperlinks, or sound) that might distract consumers' attention from the disclosure.

Advertising Examples



Electronic Example of Monthly Payments - Deferred Interest with Combo Headline



Mitchell MD400 Modern Rock Double-Cutaway Electric Guitar Natural
 ★★★★★ 1 Reviews | Write a Review
 The best-in-class Mitchell MD400 offers a carved, double cutaway mahogany body and a one-piece mahogany set neck for superior tone and sustain. Both ... [Read More](#)

In Stock & Ready to Ship

CHOOSE STYLE:
 Natural

2-Year Warranty **FREE**
 Shipping (48 Contiguous U.S. States) **FREE**

Your Price: **\$449**

1 **+** Add to Cart

\$38/Month



Suggested monthly payments
 With 12 month special financing on your
 CareCredit credit card **[insert dates, unless
 everyday offer]**
[Click](#) for important monthly payment information.

This is one option
 on how to present.
 See other options
[here.](#)



Promotional Purchase Amount	Suggested Equal Monthly Payment	Promotional Period
\$449	\$38	12

The Suggested Equal Monthly Payment shown above [(which excludes taxes and delivery)] may be greater than the required minimum monthly payment that will be on your billing statement when you use the 12 month promotional financing offer.

This estimated payment:

- Equals the promotional purchase amount divided by 12 rounded to the next highest whole dollar.
- Would pay off the promotional purchase amount within 12 months, but only if there are no other balances on your account at any time during the 12 month promotional period and you make your payments on time. Your total payments will equal the amount of the promotional purchase amount.

If the promotional purchase amount is not paid in full within 12 months, interest will be charged to your account from the purchase date and your total payments will be greater than the amount of the promotional purchase amount.

IMPORTANT: The information about the Suggested Equal Monthly Payment shown assumes the following promotional financing offer is applied to the purchase:

No Interest if Paid in Full Within 12 Months*
 On purchases **[of \$xx or more]** with your CareCredit credit card **[insert dates, unless everyday offer]**. Interest will be charged to your account from the purchase date if the promotional purchase is not paid in full within 12 months. Minimum monthly payments required.
 *[Click for details](#)

NOTE: If a monthly payment is shown in the **cart**, where taxes and shipping are included in the amount financed, then the monthly payment, Amount Financed and disclosure must be adjusted accordingly.

Electronic Example of Monthly Payment – FPRA with Combo Headline, rounded to dollar and excludes taxes and delivery



This is one option on how to present. See other options [here](#).

Mitchell MD400 Modern Rock Double-Cutaway Electric Guitar Natural
 ★★★★★ 1 Reviews | Write a Review
 The best-in-class Mitchell MD400 offers a carved, double cutaway mahogany body and a one-piece mahogany set neck for superior tone and sustain. Both... [Read More](#)


In Stock & Ready to Ship

CHOOSE STYLE:
 Natural

2-Year Warranty **FREE**
 Shipping (48 Contiguous U.S. States) **FREE**

Your Price: **\$2,412**

1 **+** Add to Cart

\$121/Month 
 With 24 month financing [insert dates, unless everyday offer]
[Click](#) for important monthly payment information.



Total Payments (including interest)	Fixed Monthly Payment Required	Promotional Period
\$2,888	\$121	24
<p>The estimated required monthly payment shown (which excludes taxes and delivery) equals the purchase price multiplied by [x.xxx%], rounded to the next highest whole dollar. During the last month(s) of the promo period the required monthly payment may be reduced due to this rounding. The sum of the required monthly payments will equal the cost of the amount financed. If you make the required payments by the due date each month, you should pay off the promotional purchase amount within the promo period, if it is the only balance you are paying off. If you have other balances on your account, this payment will be added to any other minimum monthly payments.</p> <p>IMPORTANT: The information about the Fixed Monthly Payment shown assumes the following promotional financing offer is applied to the purchase:</p> <p>17.90% APR for 24 Months* On purchases [of \$xx or more] with your CareCredit credit card [insert dates, unless everyday offer]. 24 fixed monthly payments required. *Click for details</p>		

NOTE: If a monthly payment is shown in the cart, where taxes and shipping are included in the amount financed, then the information in the box, the monthly payment amount and disclosure must be adjusted accordingly.

Monthly Payment Format Guidance

If Monthly Payment, Time Period, and Total Payment are presented all in the same font size, it would be deemed to satisfy equal prominence.

Although, reasonable format variation is allowed in font color and bolding, there should not be an over-prominence of the monthly payment amount using any of these formatting variations. Below are some examples of what would work and what would not.

COLOR VARIATION

Price: \$800
or
\$67/mo.
with 12 month financing

This color variation example continues to satisfy equal prominence.

Price: \$800
or
\$67/mo.
with 12 month financing

This color variation example places too much prominence on the monthly payment

BOLDING VARIATION

Price: **\$800**
or
\$67/mo.
with 12 month financing

This bolding variation example continues to satisfy equal prominence.

Price: \$800
or
\$67/mo.
with 12 month financing

This bolding variation places too much prominence on the monthly payment

Down Payment Impact - Example

When a provider offer requires a down payment, it is important to address the UDAAP questions set forth on page 28 of these guidelines, this page or the [Down Payment Checklist](#). These examples show how the most common requirements can be disclosed, but you should **work closely with your LMP (Legal Marketing Partner) since every situation is different.**

DOWN PAYMENT REQUIREMENTS

When is a Down Payment Required?

- Only required if the consumer uses a CareCredit credit card?
- Always required by provider regardless of the form of payment?
- Required with every purchase?
- Required with select purchases?

What forms of tender can be used for the Down Payment?

- What payment method can be used for the down payment?
- If a CareCredit credit card can be used for the down payment, does the down payment qualify for any promotional financing offer?

How much Down Payment is required?

- Is it based on a percentage of the sale?
- Is it a finite amount such as the amount of the taxes or delivery or both?

Impact of Qualifying Purchase Amount on Promo

- Is any qualifying purchase amount for a promotional offer determined before or after the required down payment?
- If monthly payments are advertised, does it accurately reflect the impact of the down payment?

Down Payment Impact - Example

These basic concepts about when a Down Payment is required and the amount required should be included in marketing copy, specifically, the subheadline. An everyday Fixed Payment/ Reduced APR example is shown below with the down payment details.

“No Money Down” cannot be advertised if there is any amount due (including but not limited to sales tax) at time of purchase.

HEADLINE: Standard - No Impact

XX.90% APR for ## Months Until Paid In Full*

SUBHEADLINE - Impact depends on answers to above questions.

On qualifying purchases of [\$1,000/\$2,500] or more made with your CareCredit credit card [account] at enrolled provider locations [and select retailers] in the CareCredit Network. [Provider/Retailer requires 10% down payment on all purchases.]

For other down payment scenarios, please work directly with your Legal Marketing Partner.

Card Name or Image Requirement

Use the words "credit card" in the first or most prominent mention of "CareCredit" OR include a prominent image of the card. Examples:

Promotional Financing for X Months*

On qualifying purchases of \$200 or more at XYZ Dental made with your CareCredit credit card account.



*Subject to credit approval. Minimum monthly payments required. Ask us for details.

Promotional Financing for X Months*

On qualifying purchases of \$200 or more at XYZ Dental.



*Subject to credit approval. Minimum monthly payments required. Ask us for details.

Deferred Interest - Print Ad Example

Type of Credit Card Promotion:

DEFERRED INTEREST

Main Headline (Trigger Type)

- Choice of font/size and color
- *No variation* in font/color throughout
- See *Creating a Promotional Financing Ad* section in this guide for additional headline wording options

Subhead

- Must be in close proximity to main headline
- Left, right or directly below headline
- Subhead must be a reasonable size in relation to headline, clear and conspicuous
- 40% of the main headline size could be a good benchmark
- Font size and color may vary, but can be no smaller than 10 pt.

Supporting Disclosure

- Connects to headline via a disclosure identifier (i.e., asterisk)
- Must appear on same page (if single-page ad)
- Can appear elsewhere on multi-page ads with redirect from first reference. Example: See page XX for details.
- Minimum 8 pt. font size
- Different promotions or retail products should each have their own identifiers and start with a new paragraph if space allows



Your Family Dentistry



 **Herrington
Dental Clinic**

**No Interest if
Paid in Full
within 12
Months***

On qualifying purchases of \$200 or more made with your CareCredit credit card at Herrington Dental Clinic. Interest will be charged to your account from the purchase date if the promotional balance is not paid in full within the promotional period. Minimum monthly payments required.

*No interest will be charged on the promo balance if you pay it off, in full, within the promo period. If you do not, interest will be charged on the promo balance from the purchase date. The required minimum monthly payments may or may not pay off the promo balance before the end of the promo period, depending on purchase amount, promo length and payment allocation. Regular account terms apply to non-promo purchases and, after promo period ends, to the promo balance. [\[Insert New Account APRs and Min Interest Charge language.\]](#) Existing cardholders: See your credit card agreement terms. Subject to credit approval.

Fixed Payments/Reduced APR - Print Ad Example

Type of Credit Card Promotion:

FIXED PAYMENTS/REDUCED APR

Main Headline (Trigger Type)

- Reasonable variation allowed in font/color/size
- Years may be used in the headline (i.e. 3 years fixed monthly payments)
- See *Creating a Promotional Financing Ad* section in this guide for additional headline wording options

Subhead

- Must be in close proximity to main headline
- Font size may vary but can be no smaller than 10 pt.
- Subhead must be a reasonable size in relation to headline, clear and conspicuous
- 40% of the main headline size could be a good benchmark
- Months must be shown in the subhead when referring to the number of equal monthly payments required (even if years are shown in headline).

Supporting Disclosure

- Connects to headline via a disclosure identifier (i.e., asterisk)
- Must appear on same page (if single-page ad)
- Can appear elsewhere on multi-page ads with redirect from first reference. Example: See page XX for details.
- Minimum 8 pt. font size
- Different promotions or retail products should have their own identifiers and start with a new paragraph if space allows

Your Family Dentistry

 **Herrington
Dental Clinic**

**17.90% APR
for 24 Months
Until Paid In Full***

On qualifying purchases of \$1,000 or more made with your CareCredit credit card account at Herrington Dental Clinic.

* Interest will be charged on promo purchases at a reduced APR from the purchase date. Fixed monthly payments are required until paid in full and will be calculated as follows: on 24-month promotions – 4.9876% of initial promo purchase amount. The fixed monthly payment will be rounded up to the next highest whole dollar and may be higher than the minimum payment that would be required if the purchase was a non-promo purchase. During the last month(s) of the promo period the required monthly payment may be reduced due to the prior months' rounding. Regular account terms apply to non-promo purchases. [\[Insert New Account APRs and Min Interest Charge language.\]](#) Existing cardholders: See your credit card agreement terms. Subject to credit approval.



Association Branding - Quick Reference Guide for Mastercard advertising

This information addresses some frequently asked questions about how to use the Mastercard brand in Synchrony Bank marketing collateral. It is not intended to replace the Mastercard Brand Mark Branding requirements document. Please see those respective documents for full details.

<p>Letter case when referencing brand in text</p>	<ul style="list-style-type: none"> • Use an uppercase “M” and lowercase “c” with no space between “Master” and “card” • The Mastercard name should appear in the same font as the surrounding text. (Only use all caps (MASTERCARD) if the other surrounding text is also in all caps.)
<p>Program Name Structure</p>	<ul style="list-style-type: none"> • If “Mastercard” is used without “CareCredit Rewards”, it must be followed by the word “card”, as in “Enclosed is your Mastercard card.” • If the full program name is used, then the word “card” can be omitted, as in “Enclosed is your CareCredit Rewards Mastercard®.”
<p>Registered trademark symbol ®</p>	<ul style="list-style-type: none"> • The ® symbol is required in the first or most prominent text use of Mastercard on a page or screen. The ® symbol may be omitted in subsequent use on that page or screen. On subsequent pages or screens, use the ® symbol if Mastercard is used in a headline.
<p>Trademark attribution notice</p>	<p>When the Mastercard name and/or Mastercard Brand Mark (Mastercard Symbol) are used, include the following trademark attribution notice once in the communication: Mastercard and the circles design are registered trademarks of Mastercard International Incorporated.</p> <p>When the World Mastercard name is used, include the following trademark attribution notice once in the communication: World Mastercard and the circles design are registered trademarks of Mastercard International Incorporated.</p> <p>When both are used: Mastercard, World Mastercard and the circles design are registered trademarks of Mastercard International Incorporated.</p> <p>If the Mastercard Symbol appears without the mention of the word “Mastercard” in the body copy of the communication, the following trademark attribution must be used instead: The Mastercard circles design is a registered trademark of Mastercard International Incorporated.</p> <p>Note: On digital communications (bricks and banners) and small-size marketing communications, the above trademark attribution notice is not required.</p>

Mastercard Guidelines (continued)

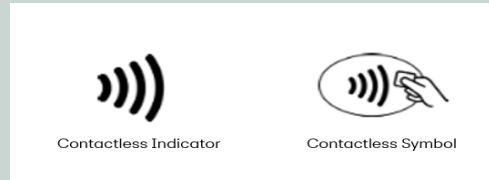


Use of Card Images in Marketing	<p>Single card: The entire card front (including the entire Mastercard branding) must be fully visible with minimal distortion.</p> <p>Multiple cards: The entire card front or at least one card must be fully visible</p>
Translations	<ul style="list-style-type: none"> • The Mastercard name must appear in English only. • The Mastercard name must not be translated into other languages nor appear in another alphabet except for specific authorized versions in Chinese (translation) and Arabic (transliteration).
Card Acceptance	<ul style="list-style-type: none"> • “...[everywhere] [anywhere] Mastercard is accepted.” • “...and start enjoying all the benefits including the convenience of acceptance at millions of locations worldwide.”
License Acknowledgement Statement	<p>When Mastercard card art or name are included, add the following disclosure: [This card] [The CareCredit Rewards Mastercard] is issued by Synchrony Bank pursuant to a license by Mastercard International Incorporated.</p>
Generic Account Number	<p>If the card art in marketing includes an account number, either a bank identification number (BIN) assigned to the issuer by Mastercard or 541275 or 222100 followed by any combination of digits up to 16 digits must be used. For example: 5412 7512 3412 3456</p>
Messaging Guidelines: Tap & Go®	<ul style="list-style-type: none"> • Use Tap & Go® to describe the action of paying with a contactless card. • The first instance is cap “T” and “G” with the registered trademark symbol; subsequent mentions can be all lower case without the registered trademark symbol. • Trademark disclosure: Mastercard and Tap & Go are registered trademarks, and the circles design is a trademark of Mastercard International Incorporated. • Use “contactless” to describe product capability: Don’t capitalize “Contactless” within a sentence unless it is referencing the icons (Contactless Indicator/Contactless Symbol); DO capitalize when referencing the icons “Contactless Indicator”/”Contactless Symbol”.



Disclosure when **Contactless Indicator and/or Symbol** are Mentioned Or Shown

- **Indicator** only: The Contactless Indicator mark, consisting of four graduating arcs, is a trademark owned by and used with permission of EMVCo, LLC.
- **Symbol** only: The Contactless Symbol is a trademark owned by and used with permission of EMVCo, LLC.
- **Both** Indicator and Symbol: The Contactless Indicator mark and the Contactless Symbol are trademarks owned by and used with permission of EMVCo, LLC.



The trademark language needs to be included unless there are space constraints.

To confirm most current Quick Reference Guide, [click here](#).

Document Change Control

The chart below contains a history of revisions made to this document.

Revision No.	Date	Author(s)	Brief Description of Change
1.0	11/3/2022	Alison Conroy, Rusty Neighbors	Modified Synchrony Enterprise Advertising Guidelines for CareCredit (removed financing options that are not applicable, updated references to “store” etc.).
2.0	5/23/2023	Bethany Jones	Updated guidelines to reflect all updates in the Synchrony Enterprise Advertising Guidelines.
3.0	5/16/2024	Bethany Jones, Rusty Neighbors	<p>Page 34: New page for New account APRs/Min Interest Charge Trigger Term Disclosure.</p> <p>Page 37: Replaced new account language in disclosure with a link to the updated new account language. Added payment factor guidance. Added "at a reduced APR" in the first sentence of the FPRA disclosure.</p> <p>Page 40: Replaced new account language in disclosure with a link to the updated new account language.</p> <p>Page 47-48: Added Business Interpretation row in the Reg Z section: OPTION FOR ANY CHANNEL: Comply with Business Interpretation of Equal Prominence as stated in the SYB M-P012 Advertising Surveillance Procedure.</p> <p>Page 48: Update UDAAP Considerations- Important Information section.</p> <p>Old Page 63: Delete page for Spend & Get offers (it is now on the Helpful Links page)</p> <p>New Page 63: Added a link to the Helpful Links page</p> <p>New page 64: New page for Helpful Links</p> <p>Page 66: Delete “Social Media Guidelines” link (it is now on the Helpful Links page)</p> <p>Pages 73-74: Added definitions for apply, ITA 1.5, prescreen; edited definitions for prequalification and quickscreen</p> <p>Page 78: Replaced new account language in disclosure with a link to the updated new account language.</p> <p>Page 79: Replaced new account language in disclosure with a link to the updated new account language. Modified first sentence of FPRA disclosure.</p> <p>Page 82: Added new approved generic headline option: Spread payments overtime</p> <p>Page 83: Replaced new account language in disclosure with a link to the updated new account language.</p> <p>Page 86: Updated Monthly Payment and Total Payments for the example.</p> <p>Page 91-92: Replaced new account language in disclosure with a link to the updated new account language.</p> <p>Page 92: Added "at a reduced APR" in the first sentence of the FPRA disclosure.</p>