

GTF Advertising and Sales Policy Guide

Version: 2.2

October 22, 2020

The Federal Trade Commission (FTC) is particularly concerned about “truth in advertising” and there are federal laws that govern how the FTC interprets what is right and fair in advertising¹. As a company we are fully invested in compliance with the state and federal governing bodies, according to our, and our attorney's, interpretation of the law.

It's important to be very clear with the potential customer about the product and services we offer. The law requires that the advertiser provide enough information in the ad to allow the consumer to make an informed decision about moving forward with the call-to-action in the ad. The FTC has said:

- Advertising must be truthful and non-deceptive;
- Advertisers must have evidence to back up their claims; and
- Advertisements cannot be unfair

This document will serve as the rules for advertising and promotion for all affiliates, CODs and internal personnel at GTF. This document may be updated as the conditions and understandings about the laws change.

1. Advertising Concepts to Focus on

It's easy to stay compliant with authorities if one focuses on the facts and benefits about the product and services that we provide to all of our clients. Here are some simple examples:

- Learn about the largest and most powerful market in the world, foreign currency exchange or FOREX.
- Learn day-trading from a company that has been educating students for over 10 years.
- Use our unique and exclusive trading indicators, only available to members.
- Trade any time, day or night, (Sunday afternoon to Friday afternoon) when you have the time.
- Meet others who are passionate about the market and want to learn how to day trade.
- Watch and learn as our coaches make trades during weekly Webinars.
- Get access to an entire online trading curriculum and learn at your own pace.
- Plug into our live training events, onsite and via Webinar.
- Get personalized training with our coaches to refine your skills.
- After finishing coaching, apply to trade our corporate affiliate's account and keep up to 80% of the profits.
- Get quarterly reviews to qualify for more funds to trade!

2. Advertising and Website Content Approval

- a. Any advertisement, job offer ad or marketing materials authored by the COD or affiliate must be approved by the compliance department in advance of being used. The COD or

affiliate must also reveal the location (URL, media, etc.) and time frame (date range) the ad will run. Send a copy of your ad (script for verbal ads) to compliance@mytradesupport.com.

- b. Any marketing Website content changes must be approved by the compliance department before being published.

3. Endorsements and Testimonials²

Endorsements must reflect the honest opinions, findings, beliefs, or experience of the endorser. Furthermore, an endorsement may not convey any express or implied representation that would be deceptive if made directly by the advertiser.

| Ref | Description | Minimum Requirement |
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| 3.1 | Testimonial by someone working for company | If using a testimonial from a student <u>who also has a material connection with the company</u> , such as a COD, Coach, employee of COD or of GTF, this must be disclosed prior to the testimonial. See Material Connection disclosure . |
| 3.2 | Income Claims NOT allowed Examples: ‘...let’s take a look at these real money statistics from students recently funded...we see a monthly account growth from just under 9% to over 137%...’ ‘...Winning indicators, Often 90% trade success...’ ‘...make \$200 to \$400 a day...’ [in a job ad] ‘pay range is \$60,000 - \$111,608 a year’ | <ul style="list-style-type: none"> ● Verbal Income or trading performance claims are NOT allowed. ● Trading Results are allowed on Websites and other media, if: <ul style="list-style-type: none"> ○ Proof of results are displayed (screenshot). ○ A Trading Performance Disclosure is prominently and conspicuously (i.e., top of page) displayed near the trading results, and ○ The disclosure MUST include whether the account is Live or Demo. See Example ● For job ads, income ranges should be replaced with something like “Pay Negotiable” or “Pay BOE”. If a dollar range is required, start the range at \$0 to emphasize that pay is commensurate with personal performance. See Example. |
| 3.3 | Lifestyle Claims only allowed if verified - treated just like income claims by the FTC. Examples: ‘...more millionaires and billionaires are created in the financial market than any other source...’ | <ul style="list-style-type: none"> ● Verbal lifestyle claims are NOT allowed. ● If you decide to use a written lifestyle claim, two things must be in place: <ul style="list-style-type: none"> ○ The claim needs to be verified and documented (referenced if quoting another source) and approved by the compliance department. ○ The Trading Performance Disclosure needs to be prominently and |

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|------------|---|--|
| | <p>‘...I’m making a full-time living...’</p> <p>‘...I was able to quit my full time job...’</p> | <p>conspicuously displayed.</p> <ul style="list-style-type: none"> ● Suggested Replacement Phrases: <p>“I’m experiencing more financial (or time, or stress) freedom than ever before.”</p> <p><u>Talk about your experience</u> with coaching, such as “My coach was so clear and concise in helping me really understand...”</p> |
| 3.4 | Words and Phrases that are not permitted | Suggested Changes to words and phrases |
| 3.4.1 | <p>“Proven,” “Guaranteed,” and “System”</p> <p>Examples:</p> <p>‘...use our <u>proven day trade system</u> to most safely and profitably navigate the [financial] flow...’</p> <p>‘...just use our company’s <u>proven</u> day trade <u>system</u> and dip in and draw out extra cash, lifestyle income, and accumulation of wealth...’</p> | <ul style="list-style-type: none"> ● Language such as “proven” and “guaranteed” are not permitted. The use of “system” to describe our indicators and training is discouraged. ● Replace with phrases like: <ul style="list-style-type: none"> ○ Great day <u>trading tools and education</u> ○ Easy to use day trading tools and education ○ Powerful day trading tools and education ○ Unique day trading tools and education |
| 3.4.2 | <p>“Professional Day Traders” or “fund managers” when referring to students and coaches</p> | <ul style="list-style-type: none"> ● Language such as “Professional Day Traders” or “fund manager” is discouraged. ● Use the following: <ul style="list-style-type: none"> ○ Trained day traders ○ Experienced day traders ○ Educated day traders |

4. Disclosures

Disclosures need to be used on all COD and corporate Websites, Multimedia, Email/SMS, Webinars, and prior to processing payment on initial sales as follows:

When and Where: Disclosures must be displayed (and/or orally stated) in a clear and conspicuous manner. What is “clear and conspicuous” depends on the context.³ Generally, this means:

- The disclosure is placed in proximity to the relevant information and definitely before the consumer makes the decision to buy (e.g., before clicking on an “order now” button or “add to cart” button).
- It is prominent. For written disclosures, the size and color are important. For oral disclosures, volume and cadence must be set so that consumers can hear and understand it.

- It is unavoidable. For marketing websites, it is recommended that the disclosure appear “[above the fold](#)” on any pages where we are embedding a marketing video, giving trade results or have testimonials and where we have visitors complete a form to see a Webinar. Above the fold is sometimes used in web development to refer to the portions of a webpage that are visible without further scrolling or clicking. The site visitor should not have to go searching for the disclosure at the bottom of the page.

a. **Full Risk Disclosure** - For all marketing websites, landing pages, emails, sales presentations, newsletters, free webinars, trading webinars, education webinars or recordings.

- i. Full Risk Disclosure Text (text w/ audio: <https://vimeo.com/412900936/15f47a7a91>):

Foreign exchange and futures trading are highly risky, and you can lose all the money you invest should you decide to engage in live trading. We are not responsible for your investment, trading or tax decisions.

We are not licensed financial advisors, traders, accountants, stockbrokers or attorneys. We are not licensed commodities brokers, and do not engage in or facilitate commodities transactions. We are not an introducing broker, and we make no recommendation as to where you should invest or what broker you should trade with. As you apply what you learn, we recommend that you seek advice from licensed professionals.

Any trade results that we show should not be considered typical of our students. We do not (and cannot) track the results or performance of our students' private trading accounts. We do not know what a typical or average student earns or loses trading.

This is not a get-rich-quick program, guaranteed system or business opportunity. We sell training and trading tools. We make no promises our training and tools will generate future income for students, and you may not make your investment back (including your investment in this training).

Any redistribution or recording of this material is strictly prohibited without advanced written permission.

b. **Trading Performance Disclosure** - When showing or posting a current or former student's Trade Results, the following disclosure should appear (or be said) adjacent to the testimonial.

- i. Trading Performance Disclosure Text:

You should not assume that the trade results of this student are typical of our students. We do not track the trade results or performance of our customers' private trading accounts. We do not know what a typical or average student earns trading. This student purchased advanced training and coaching. The purpose of our 30-day trial period is to give you the chance to assess the value of our software and other tools for yourself.

The following was from my demo (or live) account.

- ii. **Trading Performance Disclosure for Social Media, SMS(testing), chat apps** when there is not reasonable space to insert the full Trading Performance Disclosure (above). [See Example](#):

You should not assume that the trade results of this student are typical of our students. This was from my demo (or live) account. See full disclosure ---> <https://bit.ly/32mVAJT>

- c. **Material Connection Disclosure** - Included with Performance Disclosure (above) if an endorsement is from someone having a material connection with the company. If the students providing the testimonials are compensated (i.e., COD, coach, employee), that needs to be disclosed.

- i. Material Connection Disclosure Text:

In addition to being a student, [this person] receives compensation from the company to market its products and services.

- d. **Advertising Disclosure** - For all types of advertising, including radio, television, print and online ads (job ads included) the following should be displayed conspicuously, or read clearly, before or after the advertisement. If the ad is very small, and space is limited, use of this disclosure is optional. This is why it's so important to place full disclosures on landing pages and Website, where the prospect can receive full disclosure before making a buying decision:

- i. Advertising Disclosure Text:

This is not a get-rich-quick program or business opportunity. We provide training and trading tools. We make no promises that our training and tools will generate future income for students, and you may not make your investment back.

5. Sales and Onboarding of Customers

Prior to obtaining the customer's payment, the salesperson and/or the person processing the order must fully disclose the following information in writing or verbally (recorded):

a. Telephone Sale Compliance Script:

- *You are purchasing our [course type] course, for [total amount due].*
- *Included are [number of months] months of membership fees. After [number of months] months, on [date (mm/dd/yyyy)] your membership will automatically renew and you will be charged [membership amount].*
- *Your membership fee will charge automatically every month until you cancel. If you need to cancel, just send an email to cancel@mytradesupport.com before your billing month ends.*
- *(optional, if upgrading from Trader Lite) - In order to use our indicator software you'll need a computer and a reliable internet connection. If you are using a Macintosh*

computer, then you will need to install a PC emulator such as Parallels. Parallels has a 14 day free trial, but then it's \$79 a year.

- You will be receiving an email that will direct you to our Order Form and Agreement on docusign.net. This will allow you to e-sign the document. Be sure to read, initial and sign as indicated. Your order will NOT be final until you have completed this final step. Please call if you have any questions.

- b. **Disclosures** - The customer must sign/initial that they understand and agree to the Key Company Disclosures on the Trader Lite Signup Page (gotraderlite.com) or via e-sign (i.e., docusign.net) on the Order Form and Agreement when upgrading to coaching, as follows:

Agreement:

You understand and agree to the following Company Disclosures, Policies and Procedures and Payment Authorization for your purchase to be final.

| Customer Initials | Key Company Disclosures <i>The following are key policies found in our Policies and Procedures (read below) that we want to make clear and emphasize:</i> |
|--|--|
| <i>I understand and agree:</i> [e-sign or checkbox] | <i>You understand and agree to <u>only trade using a demo</u> (fake money) account while you are in training. You agree that you will not trade with a live, real money account using our tools or software until you have completed your training and received authorization from your coach.</i> |
| <i>I understand and agree:</i> [e-sign or checkbox] | <i>Trading in the foreign exchange and futures markets is highly risky, and you can lose all the money you invest should you decide to engage in live trading. All trades you make during training are done in a demo account for educational purposes. We are not responsible for your investment, trading or tax decisions.</i> |
| <i>I understand and agree:</i> [e-sign or checkbox] | <i>We are not licensed financial advisors, traders, accountants, stockbrokers or attorneys. We are not a licensed commodities broker, and do not engage in or facilitate commodities transactions. We are not an introducing broker, and we make no recommendation as to where you should invest or what broker you should trade with. As you apply what you learn, we recommend that you seek advice from licensed professionals.</i> |
| <i>I understand and agree:</i> [e-sign or checkbox] | <i>Any trade results that we show during the training should <u>not</u> be considered typical of our students. We do not (and cannot) track the trade results or performance of our students' private trading accounts. We do not know what a typical or average student earns or loses trading.</i> |
| <i>I understand and agree:</i> [e-sign or | <i>This is not a get-rich-quick program, guaranteed system or business opportunity. We sell training and trading tools. We make no promises our training and tools will generate future income for students, and you may not make your investment back (including your investment in this training).</i> |

| | |
|--|--|
| checkbox] | |
| <p><i>I understand and agree:</i></p> <p><i>[e-sign or checkbox]</i></p> | <p><i>[only for Trader Lite Signup Page]</i></p> <p><i>At the end of the 30-day free trial, you will be charged a monthly membership fee of \$326.99 to the card information you provided (see below) each month until canceled. You can cancel at any time during your free trial. To cancel, email cancel@mytradesupport.com.</i></p> |
| <p><i>I understand and agree:</i></p> <p><i>[e-sign or checkbox]</i></p> | <p><i>You have read and agree to the Policies & Procedures found at: https://secureonlinedaytradinguniversity.com/policies-and-risk-disclosure/</i></p> |

c. **Confirmation Emails** - In addition to clear and conspicuous disclosures at sign up, California law requires that we send an order confirmation email to consumers after they sign up for a free trial that automatically converts to a paid subscription. The email must include:

- That the subscription will continue unless and until the consumer cancels
- The amount that will be charged to the consumer as part of the automatic renewal plan
- Description of the cancellation policy that applies to the offer
- Deadline by which consumer must act to stop recurring charges

If there are any material changes to the offer, already-enrolled customers must be provided with a clear and conspicuous notice. If the price changes, we must get the consumers' affirmative consent to the new price at least 10 days before charging the new price.

By complying with the above, we also comply with Regulation E, implementing the Electronic Funds Transfer Act, with respect to pre authorized recurring debit charges.

d. **Taking Payment** - Credit card payments must come from the customer's own credit card accounts. It's against company policy for a COD or Rep to use their own credit card to enroll a new customer in Trader Lite or Coaching packages.

e. **Recording Sales Calls** - It's highly recommended that you record the conversations of all sales calls. In addition, most systems have built-in transcription services. This will give you the ability to audit and manage the language of your sales team and make sure that they are compliant. CODs with larger sales teams are already implementing this technology. This may become a requirement in the future for all CODs.

7. Example Trade Results with Disclosure

Displaying trading results on a Website, in a text, Instant Message or Social Media Post must be accompanied by a Trading Performance Disclosure. The disclosure must be displayed before the trading results, and it must be conspicuous and allow the visitor time to read it; no “mouse-stype.”

a. Example - Text or instant message sent by a COD or Coach

Trading Performance Disclosure:

*You should not assume that these trade results are typical of our students. This was from my demo (or live) account. See full disclosure --->
<https://bit.ly/32mVAJT>*



| | |
|---|----------------------------|
| Profit: | 1 052.67 |
| Balance: | 1 052.67 |
| EURGBPs, sell 3.00 0.87295 → 0.87250 | 2018.05.29 09:42 179.37 |
| USDJPYs, sell 3.00 109.196 → 109.140 | 2018.05.29 04:09 153.93 |
| EURGBPs, sell 3.00 0.87287 → 0.87240 | 2018.05.29 09:42 187.34 |
| AUDUSDs, sell 3.00 0.75295 → 0.75250 | 2018.05.29 11:34 135.00 |
| NZDJPYs, sell 3.00 75.627 → 75.570 | 2018.05.29 09:05 156.88 |
| USDJPYs, sell 3.00 109.050 → 109.010 | 2018.05.29 07:37 110.08 |
| GBPJPYs, sell 3.00 145.160 → 145.110 | 2018.05.29 09:15 137.63 |
| EURJPYs, sell 3.00 | 2018.05.29 09:16 |

- c. Example - Disclosure “above the fold” on Website - an alternative is to include the disclosure text within the video, at the beginning

CONTACT US MORE INFO PROGRAM DETAILS TRADER LOGIN **START 30-DAY DEMO**

Performance Disclosure: You should not assume that the following trade results are typical of our students. We do not know what a typical or average student earns from trading because we do not track the trade results or performance of our customers' private trading accounts. This student purchased advanced training and coaching. The purpose of our 30-day trial period is to give you the chance to prove the value of our software and other tools for yourself.

\$500+ in 20 minutes:



The image shows a website header with navigation links: CONTACT US, MORE INFO, PROGRAM DETAILS, TRADER LOGIN, and a prominent green button labeled START 30-DAY DEMO. Below the header is a dark green banner containing a performance disclosure text. The main content of the banner features the text "\$500+ in 20 minutes:" in large white font. Below this text are two video player thumbnails. The left thumbnail is titled "\$500 in 20 Minutes" and shows a trading chart with a play button and a 19:00 timer. The right thumbnail is titled "\$625 in 20 Minutes" and shows a similar trading chart with a play button and a 22:15 timer.

Note: The [Material Connection Disclosure](#) would also be inserted into the disclosure (above) if the person performing the trades is also endorsing the system and is a COD or employee of the company or a student that is compensated for the endorsement.

8. **Example - Job Ad with proper language and disclosure** - Two things should be in place for job ads:

- Pay Range - use “Pay Negotiable” or “Commissions” or “Based on Performance.” If you use a pay range, start the range with \$0.
- Advertising Disclosure in the body of the ad.

Currency Trader ×

Your Business, LLC - SLC, UT • Remote
Pay Negotiable - Contract

 Responded to 51-74% of applications in the past 30 days, typically within 1 day.

[Apply Now](#) 

If you are looking for just another JOB ... this opportunity is not for you. If you are looking for something you can be passionate about and put you on a path to financial freedom, with a great upside, then read on.

WHAT ARE WE LOOKING FOR?

- Individuals who are success-driven, coachable, who accept responsibility, and who ask questions.
- Individuals who see themselves becoming financially independent.

Disclosure:

This is not a get-rich-quick program or business opportunity. We sell training and trading tools. We make no promises that our training and tools will generate future income for students, and you may not make your investment back.

Job Type: Contract

Pay: Pay Negotiable

Schedule:

- Monday to Friday

Contract Length:

- Varies

Full Time Opportunity:

- Yes

9. References:

[Advertising FAQ's: A Guide for Small Business](#). Also, [Advertising and Marketing on the Internet: Rules of the Road](#) is a simple guide.

There are additional legal requirements for testimonials or endorsements (i.e., by a celebrity). The FTC has published an [Endorsement guide](#) to help with this.

The FTC's [Disclosures 101 for Social Media Influencers](#) provides guidance for making proper disclosures online and on mobile. Also, [.com Disclosures - How to Make Effective Disclosures in Digital Advertising](#).