Code of Practice (CoP) – Process for Registration, modification and Deregistration of Preferences and Recording & Revocation of Consent

A. Foreword:

I. This Code of Practice (CoP) is formulated to comply with TRAI's The Telecom Commercial Communications Customer Preference Regulations, 2018 (6 of 2018) ('TCCCP Regulations 2018').

II. This CoP deals with process steps for registration, modification and deregistration of different types of preferences including mode/time of delivery etc. It also deals with process to record and revoke the consent by a customer, for receiving messages from a particular Sender/Consent Acquirer and its header.

III. For avoidance of doubt, in the case of any difference between texts, the text set out in the TCCCP Regulations, 2018 shall take precedence. In case of any confusion in interpretation or clarification needed, the clarifications thus provided by Vodafone Idea Limited (VIL) shall be final and binding.

IV. Any modification to this CoP would be well within the rights of VIL, subject to suitable information of such changes, to concerned entities, other TSPs, as laid down in this CoP. VIL would not be liable for any financial claim or damages or any adverse action, for amendments to the CoP.

B. Sections

Section I. Scope

The Scope of this CoP is to:

1. Comply with the TCCCP regulation, 2018.

2. Effective control of Unsolicited Commercial Communication.

3. Cover process for Registration, Modification and Deregistration of Preference by consumer and its implementation by VIL systems.

4. Cover process for Consent Recording and Revocation by consumer and its implementation by VIL systems.

5. Provide Network system functioning conditions including SLAs and architecture regarding Preference.

6. Provide minimum set of information which will be put on DLT system for sharing with different Entities and in between TSPs.

Section II. Process for Preference Registration, Modification and Deregistration

A. Default status for New and Existing customers:

1. Default status of all new connections activated would be fully unblocked.

2. In case of existing customers, the default status, would remain the same as existing.

3. Customer may choose to modify their preferences as per this CoP.

B. Modes of Registering and Modification and Deregistration of Preference

- Following options of modes for Preference registration/modification/deregistration, are provided by VIL:

    1. SMS – through 1909

    2. Voice call – through 1909

    3. Interactive Voice response system (IVRS) – through 1909

    4. Vi Mobile Application

    5. Web Portal –VIL's website (authentication through OTP)

C. Process for Registration, Modification and Deregistration of Preference

1. **Procedure for registration or change of preference of Categories of content for Commercial Communications: -**

   a) Customer can opt-out for any or all of following Commercial Communications Content category (ies) of content, as per Table-1 & its foot-notes of Annexure-1.

   b) Customer can opt-in for any or all of following Commercial Communications Content category (ies) of content, as per Table-2 and its foot-notes of Annexure-1.

2. **Procedure for registration of preference or change of preference of Mode for Commercial Communications: -**

   a) Customer can opt-out of any or all of following category (ies) of mode(s) of communication, as per Table-1 and its foot-notes of Annexure-2.

   b) Customer can opt-in of any or all of following category (ies) of mode(s) of communication, as per Table-2 and its foot-notes of Annexure-2.

3. **Procedure for registration or change of preference of Time band(s) for Commercial Communications: -**

   a) Customer can opt-out of any or all of following time bands for receiving of commercial communications, as per Table-1 and its foot-notes of Annexure-3.

   b) Customer can opt-in for any or all of following time band(s) for receiving of commercial communications, as per Table-2 and its foot-notes of Annexure-3.

4. **Procedure for registration or change of preference of Day Type(s) for Commercial Communications: -**

   a) Customer can opt-out of any or all of following day type(s), as per Table-1 and its footnotes of Annexure-4.

   b) Customer can opt-in for any or all of following day type(s), as per Table-2 and its footnotes of Annexure-4

5. **Sub-Categories for Preference:**

   a) Subject to technical feasibility, VIL may also endeavour to provide additional services to its own customers like implementing sub-categories of preferences whereby consumers can opt for blocking or unblocking sub-categories under broad categories as defined under TRAI regulations. These sub-categories could be sub-sectors based, brand based, company

based etc. There will not be any time restriction during a day, for customer to receive messages based on preference opted for sub-categories.

b) For this, VIL may tie up with Senders subject to commercial consideration. VIL may open specific codes for blocking/unblocking of these sub-categories (and different type of blocking based on time-band, day, modes etc.), in line with the broad framework provided under TRAI TCCCP regulation, 2018 for main categories.

c) This being service for its own consumers with specific tie-ups with Senders, it is not required to be put up on DLT system.

6. **Guiding Rules**

a) The communication hours for the customers based on preferences given for the broad categories or for unblock status, would be 9:00 am to 9:00 pm IST during any calendar day.

b) Fully Block category would provide for blocking of all promotional and service messages excluding transactional messages. It also excludes those service messages for which specific consent has already been provided by customer. Further, if a customer gives consent for a service message in future, the preference status will automatically be changed from 'FULLY BLOCK' to 'BLOCK PROMO'.

c) If a customer is in fully blocked category, then selection of time band unblocking, will automatically put the customer in Fully Unblock category during the selected time band.

d) If a customer is in fully blocked category, then selection of day(s) unblocking, will automatically put the customer in Fully Unblock category during the selected day(s).

e) If a customer is in fully blocked category, then selection of modes unblocking, will automatically put the customer in fully unblocked category for the selected mode.

f) If a customer is in fully unblocked category, then selection of time band blocking, will automatically put the customer in fully block category during the selected time band.

g) If a customer is in fully unblocked category, then selection of day(s) blocking, will automatically put the customer in fully block category during the selected day(s).

h) If a customer is in fully unblocked category, then selection of mode blocking, will automatically put the customer in fully block category for the selected mode.

i) Similar treatment as per b) to e) above, will apply in case customer is in partially blocked or unblocked category.

j) VIL may provide further choice of sub-categories to customers, based on specific brand/purpose and header/CLI etc., for preference registration, modification and deregistration.

D. SLAs for Preference registration and its effectiveness

1. Receipt of customer's request of registration/modification/deregistration of preference will be duly acknowledged within fifteen minutes of the request made by the customer, with Unique reference number (URN). For sub-categories, additional information including brand name and header/CLI will also be informed to consumer.

2. VIL may share the requisite information (defined in subsequent Section VII.) on customer's preference with all other TSPs through DLT interconnected systems.

3. Every Access Provider shall ensure that preferences recorded or modified by the Subscriber are given effect to in near real time and in such a manner that no delivery of commercial communication is made or blocked in contravention to the Subscribers' preference after twenty-four hours or such time as the Authority may prescribe.

Section III. Process for Recording and Revocation of Consent

A. Process for Recording of Consent

1. The process captured under CoP Entities for consent recording, would apply.

B. Process for Revocation of Consent

1. VIL has establish facility for revoking the consent by its customers and has made necessary arrangements: -

(1) to receive request, from the customer, for revoking the consent, if any, given by the recipient to the sender or to the consent acquirer for the purpose of receiving a commercial communication message or voice call;

(2) to provide modes, free of cost, to the customer, as per his choice, to revoke consent either by:-

(i) *Sending SMS to short code 1909 with Label <Revoke> and <Sender ID> i.e. SMS header or to telephone number mentioned in the message or during the voice call received from the sender(s); or*

(ii) *Calling on 1909 or number mentioned for revoking the consent during the voice call received from the sender(s); or*

(iii) *Calling on customer care number; or*

(iv) Interactive Voice Response System (IVRS); or

(v) Mobile app developed in this regard either by the Authority or by any other person or entity and approved by the Authority; or

(vi) Web portal with authentication through OTP; or

(vii) Any other means as may be notified by the Authority from time to time.

(3) VIL will integrate the feed/input information from above sources to the Entity-CsAR.

(4) Entity-CsAR will remove the subscriber's contact information (telephone number to which the message was sent) from the consent record(s) corresponding to the sender for all purposes requiring explicit consent except in case specific purpose(s) (which matches with one of the consent templates registered for the Sender ID) is indicated by the customer during revocation of consent from the consent register within 1 business day;

(5) Entity-CsAR will duly acknowledge the customer's request to revoke the consent with unique reference number;

(6) Entity-CsAR will ensure that any person who receives request to revoke consent, must not disclose the customer's personal information to others without his consent;

(7) Entity-CsAR will fetch details of the consent including its purpose(s), details about day and time when it was taken, and details about sender(s) or consent acquirer(s) who has or have taken the consent;

C. **OTP generation, delivery and authentication:**

1. OTP can be generated for following scenario:

   a. Consent recording: Where an SMS from a short code, containing SMS header, purpose of seeking consent and OTP is delivered to customer, as part of consent recording process.

   b. Consent revocation: Where consumer gives a request for consent revocation through web-portal, an OTP would be sent to customer through SMS along with the SMS header from which revocation is sought.

2. The validity of the OTP, in both the above scenarios, would be 10 minutes.

3. OTP will be valid for each transaction separately.

4. OTP generation, delivery and Validation:

   a. Entity-CsAR will be responsible to generate OTPs and send the same to customer through SMS connectivity obtained from VIL.

b. In case of OTP for consent recording Customer would need to send the OTP to the same short code, through which OTP was deliver to customer.

c. Post receipt of OTP from customer, the Entity-CsAR will authenticate the same and record customer's consent post successful validation.

d. Post successful validation or failure, customer will be informed accordingly, through SMS.

Section IV. Network/System Functioning Conditions

1. Network/System Architecture

2. Standards, Specification and SLAs

3. Message Sequence Charts for messages with parameter details and time sequence to provide details about the process between two entities and action taken by particular entity;

Section V. Consequence management

1. In case of default/breach in functions to be performed by respective Entities registered/appointed by VIL, VIL may take strict action against the same which may include warning notice, show cause notice, penalty, temporary or permanent termination etc.

2. VIL may formulate an internal process on above.

Section VI. Information handover over DLT to Entities and/or other TSPs

A. DL-Preference

1. Recording preferences on Distributed Ledger for Preferences (DL-Preferences)

   a) Access Provider shall automate its internal systems and develop appropriate APIs to interact with DL-Preferences;

   b) Access Provider shall record preferences on DL-Preferences within 15 minutes for requests received from all modes;

   c) These revised preferences shall be available, in real time, for considerations by entities for scrubbing process for new list of telephone numbers under process, however, earlier messages or voice calls which have already been scrubbed and have validity may be delivered;

2. Every Access Provider shall establish, maintain and operate Distributed Ledger(s) for Preference (DL-Preference) with requisite functions, process and interfaces: -

a) to record choices of preference(s) exercised by the customer in the Distribute Ledger for preferences (DL-Preferences) in an immutable and non repudiable manner;

b) to record, at least, following details of the customer who has registered its preference(s) for the main categories*:

   i. telephone number in the international numbering format as referred in the National Numbering Plan;

   ii. lifetime history till the customer is active in its network, with date(s) and time stamp(s), of choices exercised by the customer for registering his preference(s) and subsequent changes to it made by the customer from time to time;

   iii. changes in the subscription of telephone number, during the process of opening and closing of subscription;

   iv. unique registration number issued at the time of registration of preference(s);

*As the sub-categories are intrinsic to VIL hence, same would not be required to be put on distributed ledger systems. However, same would be required to be transported to other TSP if the customer ports out to another TSP.

c) to interact and exchange information with other relevant entities, responsible to carry out functions for regulatory compliance(s), in a safe and secure manner.

d) to support any other functionalities as may be required to carry out functions for regulatory compliance(s).

B. DL-Consent

a) Every Access Provider by itself or through Entity-CsAR, shall establish, maintain and operate Distributed Ledger(s) for Consent (DL-Consent) with requisite functions, process and interfaces: -

   (i) to record consent given by the customer to sender(s) or consent acquirer(s) in the Distribute Ledger for Consent (DL-Consent) in an immutable and non repudiable manner.

   (ii) to record, at least, following details of the consent: -

      1) Telephone number of customer in international numbering format as referred in National Numbering Plan;
      2) Header of Sender(s) or Consent Acquirer(s) against which consent is taken;
      3) Day & Time when consent was taken;
      4) Validity period of consent;
      5) Type and purpose(s) of consent;

   (iii) to make consent data accessible for other entities in safe and secure manner.

(iv) to keep record of revocation of consent by the customer with specific purpose(s), if any, in an immutable and non-repudiable manner.

(v) to interact and exchange information with other relevant entities, responsible to carry out functions for regulatory compliance(s), in a safe and secure manner.

(vi) to support any other functionalities as may be required to carry out functions for regulatory compliance(s);

Section VII. Amendment to CoP

This CoP can be amended by VIL at any given point in time subject to following:

a) It is understood that CoPs stipulate various requirements which are interlinked with CoPs of other TSPs as well. Considering the same, wherever the amendment can lead to change in information sharing with other TSP and/or billing, processing etc. with other TSP, such amendment should be shared with two weeks advance intimation before actually implementing the same.

b) Wherever there is any material change for any existing Sender(s) which impacts performance of its obligations, an advance notice of at least 7 calendar days along with changes and its effective date for such existing Sender(s), should be given on their respective registered email-id.

Section VIII. Publication of CoP

This CoP may be published by VIL on its website after the implementation of the new systems and processes. A digital copy of the same should be sent to below, on their appointment/registration:

a) Entity - HR
b) Entity - Consent Registrar
c) Entity- Telemarketer functional Entity registrar
d) All registered Sender(s)
e) All registered Telemarketers
f) All registered Aggregators

Further, on any amendment to the CoP, same may be published by VIL over its website.

Section IX. Definitions

The definitions would be as per the definitions contained in TRAI's TCCCP Regulations, 2018.

Section X. Version History

Sr. No	Version Number	Date of Submission to TRAI
1	VIL_CoP_Preference - 1.0	17th October 2018
2	VIL_CoP_Preference - 1.1	**7th October 2024**