



credova

Marketing Compliance Guide

Welcome to Credova!

The Marketing & Compliance Teams are here to support your efforts as you sell with Credova. We want to make sure you're up to date on how we market with Credova. This quick start guide covers a few things to keep an eye on. Remember, one of the best things about Credova is our responsive team members, so if you have questions, just ask!

Credova Marketing Policy

Credova Policy

Let us provide materials for you! Login to your Merchant Dashboard and navigate to the Marketing Tab to find a suite of marketing materials for you to use across web, social, and email.

Please do not alter or modify marketing copy or materials provided by Credova without Credova's permission. Doing so would violate your agreement with Credova. This includes emails, images, printed materials, logos and disclaimers. Please submit any independently created consumer facing marketing copy or materials referencing Credova to the Credova marketing team for review prior to distribution. Please follow the Credova Disclaimer Trigger policy and display written disclaimers in customer facing materials as provided by Credova.

Charging a Fee

Charging any additional fees for customers who use or apply with Credova would result in a violation of Reg Z (the Truth In Lending Act). Additionally, in your Credova retailer agreement (Exhibit B Retailer Agreement, Section 7.14) it states you can't charge anything beyond what the amount charged for a cash sale of the goods would be.

Adding a fee violates this section of your agreement.

Charging an additional non-disclosed fee can potentially violate state law as well, depending on the consumers state of occupancy.

If you do attempt to charge a fee, your account will be frozen until this practice ceases. Credova may refuse to purchase or fund contracts that additional fees were charged to. This means you may not be funded for those contracts. If we have already funded the contract, we may require you to refund those payments.

Consumer Finance Regulations

There are several state and federal consumer finance regulations Credova and you must follow. These regulations guide how we market to potential consumers and ensure the fairness of our lending platform. Several key regulations, including UDAAP, ECOA, TILA, and CAN-SPAM, are covered in the following pages. As you market with Credova, please be mindful of these regulations. If you have any questions, reach out to a Credova team member.

UDAAP

In response to the 2008 financial crisis, Congress empowered the Consumer Financial Protection Bureau (CFPB) with broad authority to regulate unfair, deceptive or abusive acts or practices (UDAAP) in the consumer financial products market. Following suits, many states have adopted their own UDAAP statutes. UDAAP is essentially designed to make sure marketing and communicating financial products is as transparent as possible.

The Credova Marketing Department wants to make sure that you know we follow these regulations, and asks you to make sure you comply as well. You can learn more about UDAAP [here](#) and ask marketing@credova.com any questions you might have! It's always better to ask us if you're at all uncertain.

ECOA

The Equal Credit Opportunity Act (ECOA) is intended to ensure that financial institutions “make credit equally available to all creditworthy customers without regard to sex or marital status.” ECOA prohibits any creditor from discriminating against an applicant with respect to any aspect of a credit transaction (1) on the basis of race, color, religion, national origin, sex or marital status, or age (provided the applicant has the capacity to contract); (2) because all or part of the applicant’s income derives from any public assistance program; or (3) because the applicant has in good faith exercised any right under the Consumer Credit Protection Act.

Truth in Lending Act

The Truth in Lending Act (TILA) is a federal law passed to ensure that consumers are treated fairly by businesses in the lending marketplace and are informed about the true cost of credit. TILA requires lenders to disclose credit terms in an easily understood manner so that consumers can confidently comparison shop interest rates and conditions. TILA contains certain rules for advertising consumer financial products, including defining certain “trigger terms” that require additional disclosures.



CAN-SPAM

- Don't use false or misleading header information. Your "From," "To," "Reply-To," and routing information – including the originating domain name and email address – must be accurate and identify the person or business who initiated the message.
 - Don't use deceptive subject lines. The subject line must accurately reflect the content of the message.
 - Identify the message as an ad. The law gives you a lot of leeway in how to do this, but you must disclose clearly and conspicuously that your message is an advertisement.
 - Tell recipients where you're located. Your message must include your valid physical postal address. This can be your current street address, a post office box you've registered with the U.S. Postal Service, or a private mailbox you've registered with a commercial mail receiving agency established under Postal Service regulations.
 - Tell recipients how to opt out of receiving future email from you. Your message must include a clear and conspicuous explanation of how the recipient can opt out of getting email from you in the future. Craft the notice in a way that's easy for an ordinary person to recognize, read, and understand. Creative use of type size, color, and location can improve clarity. Give a return email address or another easy Internet-based way to allow people to communicate their choice to you. You may create a menu to allow a recipient to opt out of certain types of messages, but you must include the option to stop all commercial messages from you. Make sure your spam filter doesn't block these opt-out requests.
- Honor opt-out requests promptly. Any opt-out mechanism you offer must be able to process opt-out requests for at least 30 days after you send your message. You must honor a recipient's opt-out request within 10 business days. You can't charge a fee, require the recipient to give you any personally identifying information beyond an email address, or make the recipient take any step other than sending a reply email or visiting a single page on an Internet website as a condition for honoring an opt-out request. Once people have told you they don't want to receive more messages from you, you can't sell or transfer their email addresses, even in the form of a mailing list. The only exception is that you may transfer the addresses to a company you've hired to help you comply with the CAN-SPAM Act.
 - Monitor what others are doing on your behalf. The law makes clear that even if you hire another company to handle your email marketing, you can't contract away your legal responsibility to comply with the law. Both the company whose product is promoted in the message and the company that actually sends the message may be held legally responsible.

Compliance Tips

- UDAAP is one of the most important rules Marketing has to follow, see UDAAP SUMMARY for more information.
- If you put specific terms down, that must be accompanied with a disclaimer. It's often best to AVOID any marketing material with specific terms listed.
- If you put "As Low As" or provide examples of interest rates, those figures must come from the Credova calculator tool and be accompanied by a disclaimer.
- Any reference to "Guaranteed Approvals" should not be made. While Credova is able to match a significant portion of applicants with lending options, there are no guaranteed approvals.
- Credova's policy is to be forthcoming and transparent about all aspects of consumers financing options and to provide all information that a consumer would require to make an informed decision about the financing option.

Trigger Terms & Disclaimers


The Truth in Lending Act's purpose is to help consumers make the most informed decision possible. So if we state an any trigger term: an amount of payment, the number of payments or period of repayment, the amount or percent of any down payment, or the amount of any finance charge or APR, we must fully disclose all the associated terms for a consumer to better understand the impact to them or if they'd like, to shop for comparable financing products.

The associated terms can be provided through an illustrative example. Credova has provided model disclosures for your use.


If you ever have content that has a trigger term, you're going to need a disclaimer! Because of the intricacies of consumer finance regulations, Credova has a policy that merchant partners only use Credova created marketing materials. If you do ever create your own materials promoting Credova, please send to marketing@credova.com for review and clearance prior to releasing.

Product ALA Disclaimers


Pricing showing on product display and listing pages, on all products sub \$150:

 Pay over time with **credova**. [Learn More](#)


Pricing showing on product display and listing pages, on items between \$150-\$300.

 4 interest free payments of \$X with **credova**. [Learn More](#)

Pricing showing on product display and listing pages, on items between \$300-\$700.

 Starting at 0% APR or \$X/month with **credova**. [Learn More](#)

Pricing showing on product display and listing pages, on items between \$700-\$10,000.

 As low as \$X/month with **credova**. [Learn More](#)

Terms Used in Advertising	What Disclosure is Needed
No trigger term identified.	None
Pay in 4 example.	Needs to display the Credova Pay in 4 disclosure.
Actual rate of finance charge.	Needs to be referred to as an "annual percentage rate" or APR.
If APR can increase.	Needs to be disclosed as a variable rate.
The amount or percentage of any down payment.	If ANY of these trigger terms are included ALL of the following must be included in the advertisement: 1) The amount or percentage of the down payment. 2) The terms of repayment, which reflect the repayment obligations over the full term of the loan, including any balloon payment; 3) The "annual percentage rate," use that term, and, if the rate may be increased after consummation.
The number of payments or period of repayment.	
The amount of any payment.	
The amount of any finance charge.	

ALA Marketing Disclaimers

If you offer both Pay in 4 and long duration installments and have a Pay in 4 ALA in your marketing, then use the following disclaimer.



4 interest free payments of \$X with credova. [Learn More](#)

If you only offer Pay in 4 and have Pay in 4 ALA in your marketing, then use the following disclaimer.



4 interest free payments of \$X with credova. [Learn More](#)

If you offer both Pay in 4 and long duration installments and show a combination ALA in your marketing use the following disclaimer.



Starting at 0% APR or \$X/month with credova. [Learn More](#)

If you only offer long duration installments and show an ALA in your marketing use the following disclaimer.



As low as \$X/month with credova. [Learn More](#)

If you're integrated with Credova, you don't need to worry about manually adding disclaimers to your "As low As" pricing, they will automatically populate on the pop-up.

Pay in 4 is available on purchases between \$150-\$700. Rate and information provided are subject to underwriting guidelines and applicant's creditworthiness as established by their credit profile. By clicking "Prequalify," you are requesting to prequalify for all financial products offered through Credova, including interest-bearing products. Not all offers are Pay in 4 offers. Payment options through Credova are provided by merchants, other financial institutions, Alabama Credit Union member NCUA, or Credova Financial, LLC. To learn more visit: www.credova.com/financingproviders. Not all financing products are available in all 50 states. Actual payments may vary. Other terms and conditions may apply. Shipping and taxes are not included. THIS IS A SOLICITATION FOR FINANCING PRODUCTS ONLY. INFORMATION RECEIVED WILL BE SHARED WITH ONE OR MORE THIRD PARTIES IN CONNECTION WITH YOUR FINANCING PRODUCT INQUIRY. THE LENDER MAY NOT BE SUBJECT TO ALL VERMONT LENDING LAWS. THE LENDER MAY BE SUBJECT TO FEDERAL LENDING LAWS. Credova Financial, LLC, NMLS ID 1818530.

Payment options through Credova are provided by merchants, other financial institutions, Alabama Credit Union member NCUA, or Credova Financial, LLC. To learn more visit: www.credova.com/financingproviders. Not all financing products are available in all 50 states. Rate and information provided are subject to underwriting guidelines and applicant's creditworthiness as established by their credit profile. Actual payments may vary. Other terms and conditions may apply. Shipping and taxes are not included. THIS IS A SOLICITATION FOR FINANCING PRODUCTS ONLY. INFORMATION RECEIVED WILL BE SHARED WITH ONE OR MORE THIRD PARTIES IN CONNECTION WITH YOUR FINANCING PRODUCT INQUIRY. THE LENDER MAY NOT BE SUBJECT TO ALL VERMONT LENDING LAWS. THE LENDER MAY BE SUBJECT TO FEDERAL LENDING LAWS. Credova Financial, LLC, NMLS ID 1818530.

The example provided is based on a borrower with a 700 credit score with \$0.00 down payment, repayment in up to 24 monthly installments, and an annual percentage rate (APR) of 35.96%. Payment options through Credova are provided by merchants, other financial institutions, Alabama Credit Union member NCUA, or Credova Financial, LLC. To learn more visit: www.credova.com/financingproviders. Not all financing products are available in all 50 states. Rate and information provided are subject to underwriting guidelines and applicant's creditworthiness as established by their credit profile. Actual payments may vary. Other terms and conditions may apply. Shipping and taxes are not included. THIS IS A SOLICITATION FOR FINANCING PRODUCTS ONLY. INFORMATION RECEIVED WILL BE SHARED WITH ONE OR MORE THIRD PARTIES IN CONNECTION WITH YOUR FINANCING PRODUCT INQUIRY. THE LENDER MAY NOT BE SUBJECT TO ALL VERMONT LENDING LAWS. THE LENDER MAY BE SUBJECT TO FEDERAL LENDING LAWS. Credova Financial, LLC, NMLS ID 1818530.

3 Month Interest Free Marketing Disclaimers

If you're integrated with Credova, you don't need to worry about manually adding disclaimers to your "As low As" pricing, they will automatically populate on the pop-up.

If you offer 3 month interest free promotional products from Credova and market this in any materials please use the following disclaimer.



90 days interest free with credova. [Learn More](#)

Payment options through Credova are provided by merchants, other financial institutions, Alabama Credit Union member NCUA, or Credova Financial, LLC. To learn more visit: www.credova.com/financingproviders. Not all financing products are available in all 50 states. Rate and information provided are subject to underwriting guidelines and applicant's creditworthiness as established by their credit profile. Actual payments may vary. Other terms and conditions may apply. Shipping and taxes are not included. Not all offers are 3 months interest free. Approval dependent on applicants credit profile. THIS IS A SOLICITATION FOR FINANCING PRODUCTS ONLY. INFORMATION RECEIVED WILL BE SHARED WITH ONE OR MORE THIRD PARTIES IN CONNECTION WITH YOUR FINANCING PRODUCT INQUIRY. THE LENDER MAY NOT BE SUBJECT TO ALL VERMONT LENDING LAWS. THE LENDER MAY BE SUBJECT TO FEDERAL LENDING LAWS. Credova Financial, LLC, NMLS ID 1818530.



3 months interest free with credova. [Learn More](#)

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Approved Marketing Copy

The following slides provide approved marketing copy and their required disclaimers for your use. Use the approved examples and associated disclaimers in your marketing collateral. If you have any further questions please contact marketing@credova.com.

Copy Examples: If You Only Offer Long Duration Financing

- Adventure now pay later with Credova.
- Pay over time. Get approved with no credit impact.
- Buy now, pay later with Credova. Get approved with no credit impact.
- Easy Approvals. Apply online and get approved in seconds. Applications can be filled out from any device with an internet connection.
- Prequalify with no credit impact. There are no hard inquiries so you can get prequalified and choose from multiple financing options with no impact to your credit score.
- Pay your way. Credova puts the purchasing power in your hands with monthly payments instead of paying for the entire purchase upfront.
- Pay over time. Apply for financing options for purchases up to \$10,000, with terms between 12-60 months.

Disclaimer Required

For complete Credova disclaimers and disclosures, please visit www.credova.com/disclaimers.

Copy Examples: If You Offer Pay in 4 & Long Duration Financing

- Adventure now pay later with Credova.
- Pay over time. Get approved with no credit impact.
- Buy now, pay later with Credova. Get approved with no credit impact.
- Easy Approvals. Apply online and get approved in seconds. Applications can be filled out from any device with an internet connection.
- Prequalify with no credit impact. There are no hard inquiries so you can get prequalified and choose from multiple financing options with no impact to your credit score.
- Pay your way. Credova puts the purchasing power in your hands with monthly payments instead of paying for the entire purchase upfront.
- Pay in 4 payments. Pay in 4 lets you split purchases between \$150 and \$700 into four equal payments, with no interest, ever.
- 4 payments, no interest.
- Shop now, pay in 4 interest free installments with Credova.
- Now offering 4 payments no interest on purchases.
- Pay over time. Credova offers additional financing options on purchases up to \$10,000, with terms between 12-60 months.

Disclaimer Required

For complete Credova disclaimers and disclosures, please visit www.credova.com/disclaimers.

Copy Examples: If You Offer Pay in 4

- Pay over time. Get approved with no credit impact.
- Buy now, pay later with Credova. Get approved with no credit impact.
- Easy Approvals. Apply online and get approved in seconds. Applications can be filled out from any device with an internet connection.
- Prequalify with no credit impact. There are no hard inquiries so you can get prequalified and choose from multiple financing options with no impact to your credit score.
- Pay your way. Credova puts the purchasing power in your hands with monthly payments instead of paying for the entire purchase upfront.
- Pay in 4 payments. Pay in 4 lets you split purchases between \$150 and \$700 into four equal payments, with no interest, ever.
- 4 payments, no interest.
- Shop now, pay in 4 interest free installments with Credova.
- Now offering 4 payments no interest on purchases \$150-\$700.

Disclaimer Required

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Printable In-store Marketing Materials:

Buy Now, Pay Later with credova

Get approved with no impact to your credit for up to \$10,000 and pay for your purchase over time.

Scan the QR code to prequalify today.



STEP 1:  **Fill Your Cart**
Shop your favorite stores and then select Credova at checkout.

STEP 2:  **See How Much You Can Spend**
Get approved without affecting your credit score.

STEP 2:  **Pay Over Time**
Select Credova at checkout to pay for your purchase over time.

CREDOVA.COM  **833.273.3682**


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Printable in-store marketing materials that do not include trigger terms, include the following disclaimer.

Disclaimer Required

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Pay in 4 Email Example:



NATIVE FOREST
CAMPING AND ADVENTURE

Pay in 4 with Credova is here.

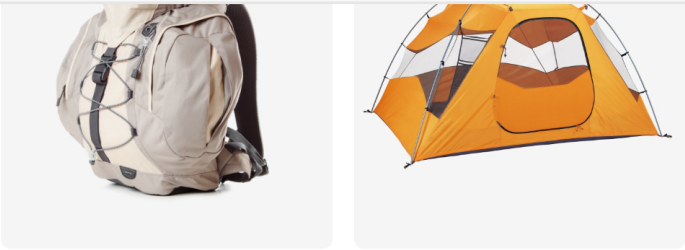
Hey {{first name}},

We've got some good news! Get the gear you need now, and split your purchase into 4 small payments with 0% interest when you choose Credova at checkout.

Here's how it works:

- Step 1**
Fill your cart
Shop your favorite stores and then select Credova at checkout.
- Step 2**
See how much you can spend
Get approved without affecting your credit score.
- Step 3**
4 payments, no interest

Annotations:
- Insert Merchant Company logo and hero image here.
- Highlight Pay in 4 copy here.
- Credova how it works section here with icons.



Backpack
\$240
4 interest free payments of \$60 with credova. [Learn More](#)


Dome Tent
\$260
4 interest free payments of \$65 with credova. [Learn More](#)

Pay in 4 with Credova.
Get outside and get exploring.
[Learn More](#)

For complete Credova disclaimers and disclosures, please visit www.credova.com/disclaimers.

Annotations:
- Highlight featured products here with ALA.
- Trigger Terms
- Learn more about Credova button
- Credova Disclosures

Long Duration Email Example:



NATIVE FOREST
CAMPING AND ADVENTURE

Insert Merchant Company logo and hero image here.

Pay over time with Credova.

Highlight pay over time copy here.

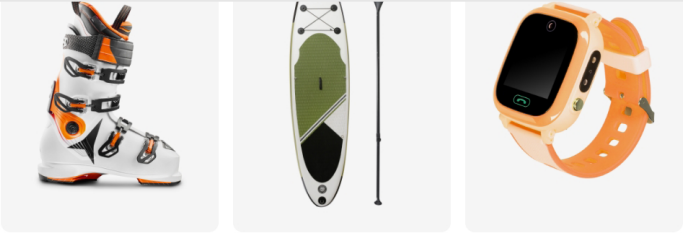
Hey {{first name}},

Guess what? Now you can pay over time for purchases without the compounding interest charges of credit cards thanks to Credova.

Here's how it works:

Credova how it works section here with icons.

- Step 1**
Fill your cart
Shop your favorite stores and then select Credova at checkout.
- Step 2**
See how much you can spend
Get approved without affecting your credit score.
- Step 3**
Pay over time



Highlight featured products here with ALA.

Ski Boots
\$600
As low as \$34/month with credova. [Learn More](#)

Paddle Board
\$700
As low as \$41/month with credova. [Learn More](#)

GPS Watch
\$800
As low as \$47/month with credova. [Learn More](#)

Trigger Terms

Pay over time with Credova.

Get outside and get exploring.

[Learn More](#)

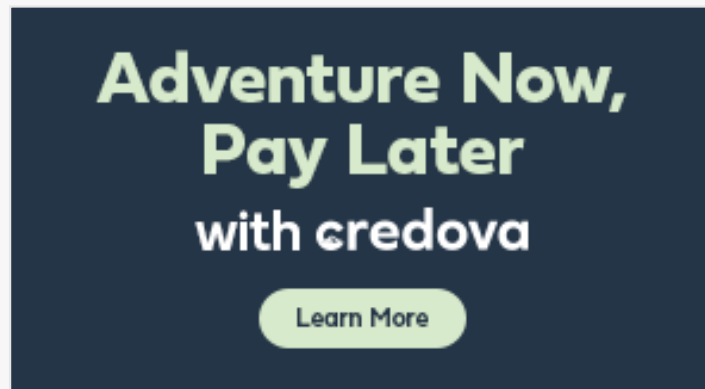
Learn more about Credova button

For complete Credova disclaimers and disclosures, please visit www.credova.com/disclaimers.

Credova Disclosures

Banner Examples: If You Only Offer Long Duration Financing

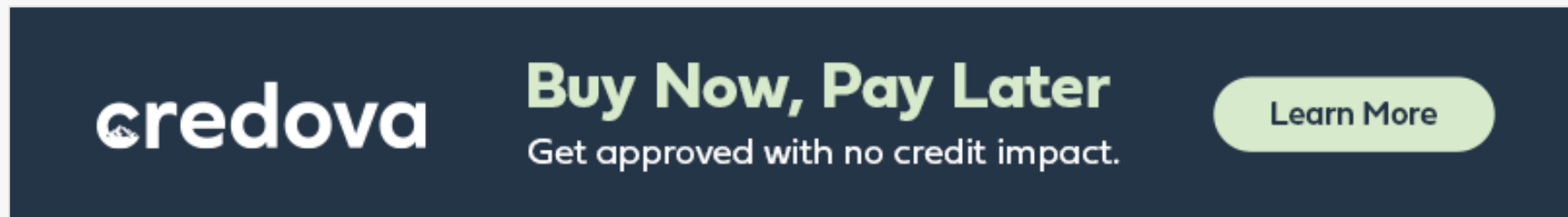
No disclaimer necessary. If you offer long duration financing options through Credova, you have access to a multitude of banner options through your merchant dashboard. When a customer clicks "Learn More" they enter the API environment, which houses our full disclaimer. Therefore, on these banners, no disclaimer is required.



296 x 163



400 x 99



792 x 122

Banner Examples: If You Offer Pay in 4 & Long Duration Financing

If you offer Pay in 4 in combination with long duration options, the following banners are available to you. Please use the Pay in 4 disclaimer provided:

*Pay in 4 is available on purchases between \$150-\$700. Rate and information provided are subject to underwriting guidelines and applicant's creditworthiness as established by their credit profile. By clicking "Learn More", you are requesting to prequalify for all financial products offered through Credova, including interest-bearing products. To learn more visit: www.credova.com/financingproviders. Not all offers are Pay in 4 offers.

Now offering 4 payments, no interest* on purchases \$200-\$600. 

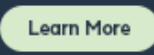
*Data and information provided are subject to underwriting guidelines and applicant's creditworthiness as established by their credit profile. By clicking "Prequalify," you are requesting to prequalify for all financial products offered through Credova, including interest-bearing products. Not all offers are Pay in 4 offers.

400 x 99

Pay Over Time 


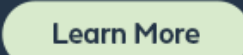
Get approved with no credit impact. 

400 x 99

**4 Payments,
No Interest***
with credova 


*Pay in 4 is available on purchases between \$200-\$600. Rate and information provided are subject to underwriting guidelines and applicant's creditworthiness as established by their credit profile. By clicking "Prequalify," you are requesting to prequalify for all financial products offered through Credova, including interest-bearing products. Not all offers are Pay in 4 offers.

296 x 163

 **Buy Now, Pay Later** 

Get approved with no credit impact.

792 x 122

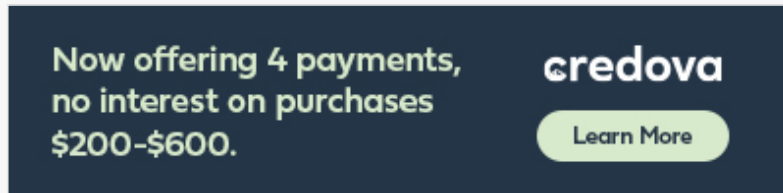
**Shop Now,
Pay in 4
Interest Free
Installments***
with credova 

*Pay in 4 is available on purchases between \$200-\$600. Rate and information provided are subject to underwriting guidelines and applicant's creditworthiness as established by their credit profile. By clicking "Prequalify," you are requesting to prequalify for all financial products offered through Credova, including interest-bearing products. Not all offers are Pay in 4 offers.

262 x 663

Banner Examples: If You Offer Pay in 4

If you offer Pay in 4, the following banners are available to you.
No disclaimer is needed on the following banners.



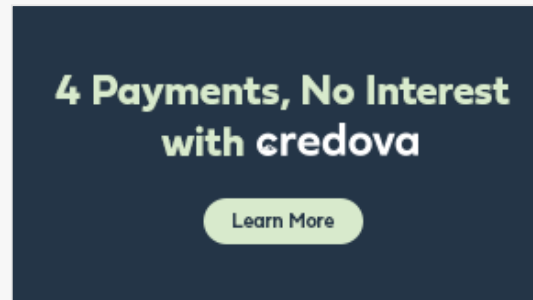
Now offering 4 payments,
no interest on purchases
\$200-\$600. credova
[Learn More](#)

400 x 99



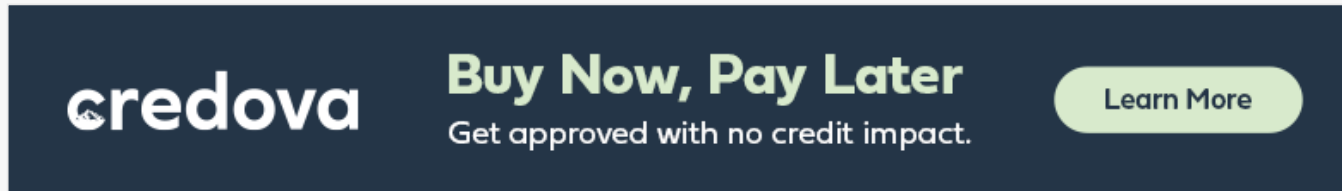
Pay Over Time credova
Get approved with no credit impact. [Learn More](#)

400 x 99



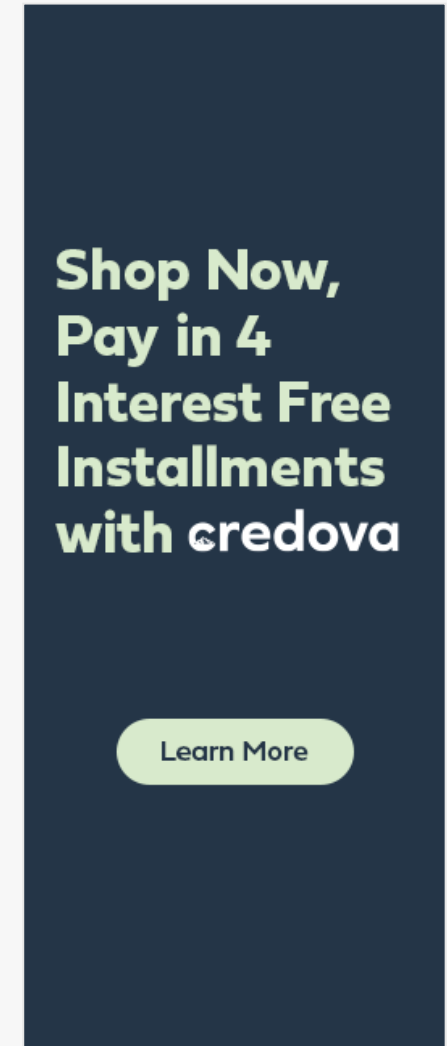
4 Payments, No Interest
with credova
[Learn More](#)

296 x 163



credova **Buy Now, Pay Later**
Get approved with no credit impact. [Learn More](#)

792 x 122

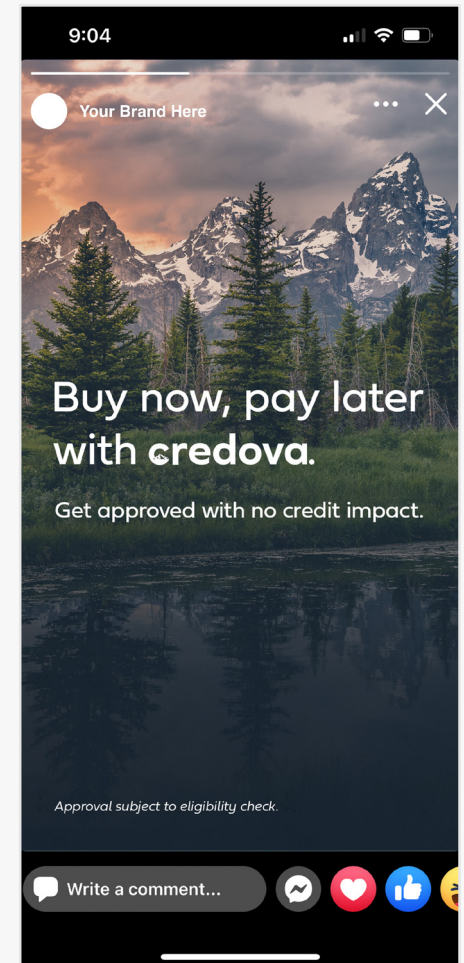
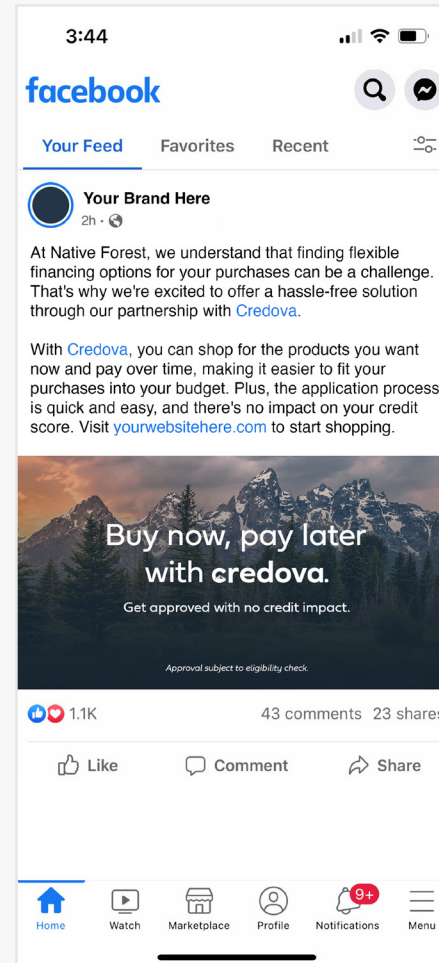
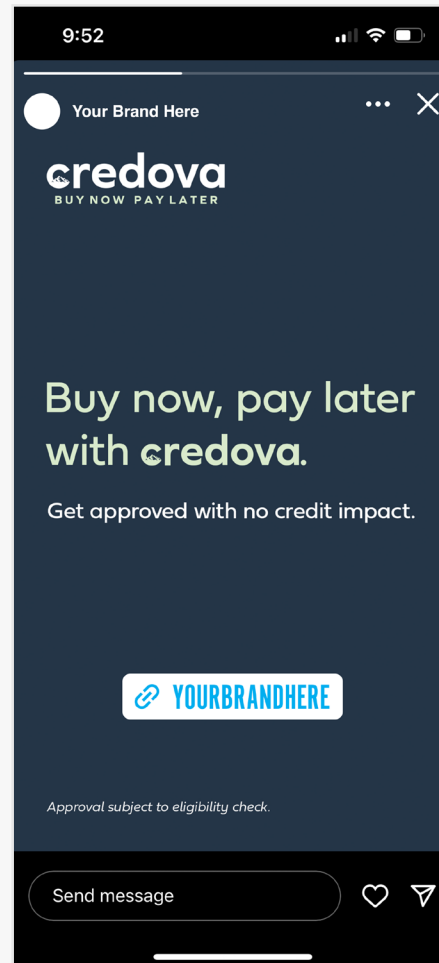
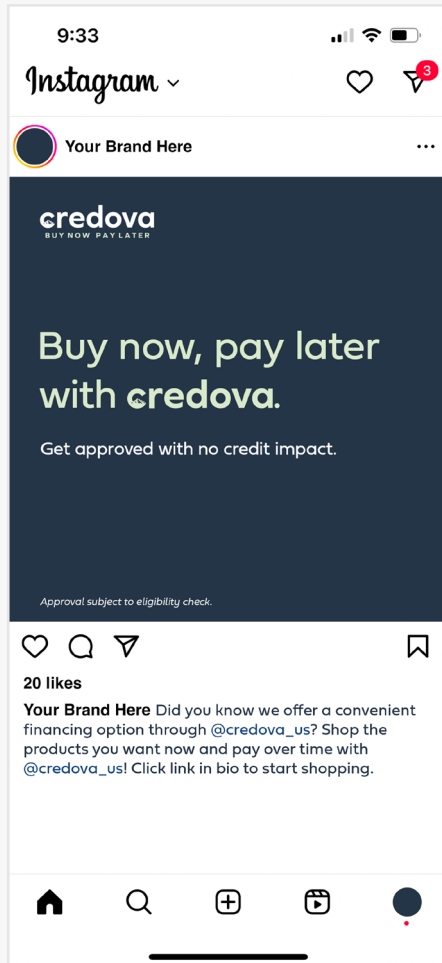


**Shop Now,
Pay in 4
Interest Free
Installments**
with credova
[Learn More](#)

262 x 663

Social Media Ad Example:

Social assets can be found in your merchant dashboard.
No disclaimer necessary.





Thank you

credova