

# Athene guidelines for telephone & video solicitation



In today's ever-changing world, Athene will continue to provide you the tools to succeed. Please follow these helpful guidelines to stay "virtually" connected to your clients and continue to drive sales.

## Summary

Use of Telephone, including cell phones, or Voice over Internet Protocol technologies, such as Skype, or other real-time web-based, face-to-face video platforms like Facetime (collectively, "Video Platforms") during the solicitation and sale of an annuity have become popular solutions for the annuity sales process when in-person meetings are just not possible. Because these tools change how producers conduct business, Athene created the following Telephone and Video Platform Sales Guidelines ("Guidelines") to support and assist producers in navigating the solicitation and sales of Athene annuities with these tools.

Athene will accept applications solicited via Telephone and Video Platforms made in accordance with these Guidelines. All Athene solicitation, sales, and "In Good Order" policies, as well as applicable laws and regulations, continue to apply to Telephone and Video Platform solicitations and sales.

## Highlights of these guidelines include:

- Cold calling using Telephone and Video solicitation is not allowed.
- Producers must have the required insurance producer license, training and appointments in all states where Telephone and Video Platform solicitation or sales processes occur. These requirements are consistent whether solicitation and sale occur in person or via Telephone and Video Platform. The producer must be licensed in both the state where they and their customers are located during the sale.

**For financial professional use only.** Not to be used with the offer or sale of annuities.

This material is provided by Athene Annuity and Life Company (61689) headquartered in West Des Moines, Iowa, which issues annuities in 49 states (excluding NY) and D.C.

- The solicitation state on the application is where the customer is located. Telephone and video solicitation may only occur when the customer is in their resident state. A customer must be present in their resident state during the solicitation, sale, application signing and policy delivery. **The application must be signed by the customer in their resident state.**
- Producers must use a private location while using Telephone or Video Platforms to maintain the confidentiality of customer Personally Identifiable Information (“PII”).
- If using paper forms, all forms must be completed by the producer before the customer signs the forms; a customer may not sign blank forms and return them to the producer. Once signed, customers must send all documents to the producer for the producer’s signature. Producers should never sign an application or any related forms before the customer signs them.
- The producer should make a record of each meeting held with a customer via Telephone or Video Platform, noting the date and time, whether anyone else participated in the meeting, subject matter and materials that were discussed at the meeting.
- If there are delays or interruptions in service, or any other type of technical difficulty, the producer should contact the customer to re-schedule the meeting or conduct the meeting in person.
- Annuity contracts must be delivered to the customer in a timely fashion. Policy delivery receipt requirements are unchanged.

Athene neither endorses nor prohibits solicitation via Telephone or Video Platform. Producers should evaluate the circumstances of individual sales prior to using these Guidelines. Producers assume any risks associated with using Telephone and Video Platform solicitations and/or sales and accept all terms of use; including, damages resulting from unauthorized access or release of confidential Personally Identifiable Information (“PII”).

Athene reserves the right, at our discretion, to change, modify, add or remove portions of the Telephone & Video Platform Sale Guidelines at any time and without prior notice.

The use of Telephone and Video Platform solicitation and/or sales is prohibited in New York and any other state specifically prohibiting their use.

## Anti-money laundering

Consistent with Athene's Anti-Money Laundering (AML) and Know Your Customer practices, the customer's current government picture ID is required when completing an Athene application, suitability forms and other Know Your Customer documents.

If forms are completed by a producer via Video Platform, the producer is required to view the customer's government issued picture ID while on the video conference and record the information on the required paperwork. The producer must verify the individual on the screen is the same as the person pictured on the government ID. For best practice, producers should capture a screenshot of the government ID to send to us with the application and retain a copy for their files.

If the application and other required forms are completed by a producer via Telephone, the producer is also required to view the client's government issued picture ID and record the information on the required paperwork. The producer must verify the individual on the Telephone is the same as the person pictured on the government ID. The producer should obtain a current copy of the client's government ID for their records.

## Cold-calling

Cold calling (e.g., an unsolicited call or contact with a consumer) is prohibited under Athene's Telephone and Video Platform guidelines.

## Producer licensing

Care needs to be taken to ensure that no solicitation and/or sale is made by a non-licensed individual. The producer is required to be licensed in the customer's resident state where the solicitation and sale occur. Producers are also required to be physically in a state where they are licensed when conducting the solicitation and sale and that the annuity being sold is approved in the customer's resident state. For example, assume the customer is an Illinois resident and the producer is licensed in Illinois, then the producer should not be conducting the solicitation and sale from a vacation home in Florida unless that producer is also licensed in Florida.

Consistent with state regulations and Athene's sales guidelines, the producer who solicits the sale must be the producer who signs the application as the producer of record.

## Marketing materials and disclosure usage

Athene producers must be familiar with all Athene sales literature and marketing materials, and thus able to explain the terms and features of Athene annuities properly by using such materials. It is imperative that a customer fully understands the annuity purchased.

When using marketing materials and disclosure documents to describe an Athene annuity, which may include a printout of an illustration, it is imperative that the customer and producer possess exact copies of all documents. All documents that the producer is required to provide to the customer must be available in print and/or electronic format. Both parties must also have exact copies of documents during any discussion. The producer should keep records of each meeting held with a client via Telephone or Video Platform, noting the date and time, whether anyone else participated in the meeting, subject matter and materials that were discussed at the meeting.

## Non-resident sales

The solicitation, completion of the application and policy delivery must take place in the customer's resident state. If the producer uses Telephone or Video Platform with a prospective customer at any time during the sales process and the prospective customer is not in their state of residence, it may be considered a non-resident sale. Nonresident/cross-border sales are not permitted under these Guidelines. The solicitation state on the application is where the customer is located. Telephone and video solicitation may only occur when the customer is in their resident state. The customer must be present in their resident state when solicitations occur, the customer signs an application for an Athene annuity and when the customer receives the Athene annuity contract.

## Solicitation and completing paperwork

Producers should conduct the solicitation and sale somewhere private and recommend to the customer that they also be somewhere private during the meeting to maintain the confidentiality of customer PII. In other words, the producer should not be conducting the Telephone or Video Platform solicitation from a public venue, such as park, coffee shop or restaurant. If the entire solicitation takes place via Telephone or Video Platform, the producer must ensure that all required paperwork is forwarded to the producer's office for signature.

Be aware that the producer must use forms required for the state in which the sale took place and where customer signed the application. All forms must be completed by the producer before the customer signs the application; a customer may not sign blank forms and return them to the producer. The producer may not pre-sign either the application nor disclosure forms, as they are certifying that information on the form is accurate and the producer has discussed/presented certain important contract information, such as the Withdrawal Charge schedule.

The customer should mail any initial premium to the producer's office, payable to Athene Annuity and Life Company, and the producer should let the customer know the date the producer signed the application and when the application and premium were forwarded to Athene.

Documentation is key. The producer should make a record of each meeting held with a customer via Telephone or Video Platform, noting the date and time, whether anyone else participated in the meeting, subject matter and materials that were discussed at the meeting.

## Policy delivery

Annuity contracts must be delivered to the customer in a timely fashion. Contract delivery receipt requirements are unchanged, and the customer must receive the physical contract. Contract delivery will not be properly evidenced by simply witnessing a customer possess the annuity contract over a Video Platform or being told that the customer possesses the annuity contract over Telephone. If a producer does not personally deliver the annuity contract, the contract must be delivered to the customer via Athene's e-delivery method, by USPS (return receipt requested), UPS, FedEx or another service to confirm delivery location and time to the owner.

The annuity contract must be delivered to the customer in the same state in which the application was signed. The producer is responsible for returning the delivery receipt, as well as completing any other post-issue requirements, to Athene, as per our normal procedures.

Although electronic delivery of the annuity contract by the producer to the customer is prohibited, the customer may request electronic delivery from Athene. Policy delivery requirements are unchanged.

## Technological issues

During producers' meetings with customers, it is important that the producer listen to the customer's concerns and answer their questions about Athene's products. However, Telephone and Video Platforms, as with all forms of digital and electronic communication, may experience technical difficulties, which could complicate the solicitation and sales process. Therefore, producers must take extra precautions when conducting insurance business using Telephone or Video Platforms. If there are delays or interruptions in service, or any other type of technical difficulty, the producer should contact the customer to re-schedule the meeting or conduct the meeting in person.

Solicitations and sales made using Telephone or Video Platforms could involve the electronic transfer of confidential PII between the customer and producer. It is the producer's responsibility to maintain adequate physical, technical and administrative safeguards to prevent unauthorized access to customer PII. Producers are responsible for all damages resulting from a security breach of their systems causing the unauthorized release of customer PII.

## Conclusion

Use of Telephone and Video Platform is a convenient and cost-effective way for producers to communicate with potential and existing customers when face to face meetings are not possible. Athene neither endorses nor prohibits its producers from using Telephone or Video Platforms during the solicitation and sale of Athene annuities. These Telephone and Video Platform Guidelines represent supplemental sales rules, that, in addition to existing Athene policies and procedures must be understood by producers prior to selling an Athene annuity.

Athene Annuity and Life Company (61689), headquartered in West Des Moines, Iowa, and issuing annuities in 49 states (excluding NY) and D.C. is not undertaking to provide investment advice for any individual or in any individual situation, and therefore nothing in this should be read as investment advice.

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