

Email contacts that are known Canadians will be processed under Canadian Anti-Spam Law (CASL) rules.

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## Identifying CASL Applicable Individuals

Ascent360 identifies individuals as Canadians if they have a known address in Canadian territory or if they have a “.ca” email address.

Here's how their email permission is determined:

- If they **have** explicitly subscribed or unsubscribed, Ascent360 considers this a “explicit” email permission and the subscriber will remain with that email permission status unless they change it.
- If they **have never** explicitly subscribed or unsubscribed, we consider this a “implicit” email permission. If they **have made** a purchase within the last 23 months, we consider them contactable, or a “soft” yes because there is an implied business relationship due to the financial transaction. This allows them to be contacted by email for up to two years after the transaction.
- If their last financial purchase was more than 23 months ago, they are no longer considered contactable and we treat them as a “implicit” unsubscribe.
- Similarly, if an implicit opt-in or opt-out explicitly unsubscribes or subscribes, their subscription settings change to a explicit no or explicit yes.

Last Financial Purchase Date	Current Email Permission			
	Explicit No	Explicit Yes	Implicit Yes	Implicit No
23+ months ago	Not contactable	Contactable	Becomes Implicit No and not contactable	Not contactable

Less than 23 months ago	Not contactable	Contactable	Contactable	Becomes Implicit Yes and contactable
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**Please note:** If any transaction data, specifically around a financial purchase date, was not being sent to Ascent360 correctly, that would impact the customer's email permission for any contacts being processed under CASL rules. Because of this, a lack of transaction data will result in a higher percentage of implicit unsubscribes.