



CLIENT COMPLIANCE PRIMER  
SEPTEMBER 2018

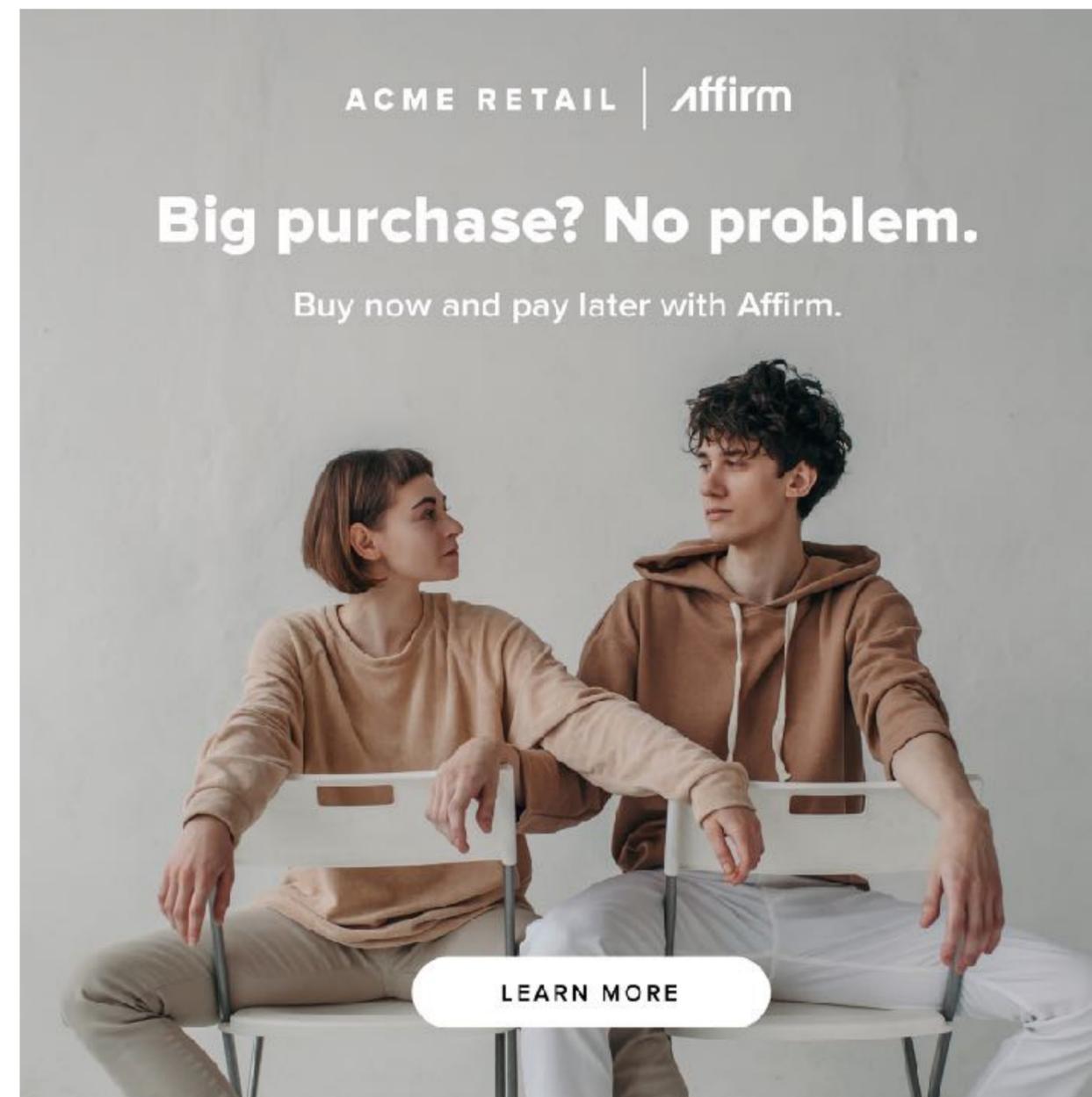
# Introduction

Depending on how you market Affirm, you may need to include a disclosure based on financial regulations. This primer will describe when that disclosure is needed, where it should go, and what it should say.

# When you **don't** need a disclosure

You can mention the following terms **without** including a disclosure:

- Affirm
- Monthly payments
- Pay over time
- Buy now, pay later
- Financing
- 0% APR
- 10–30% APR

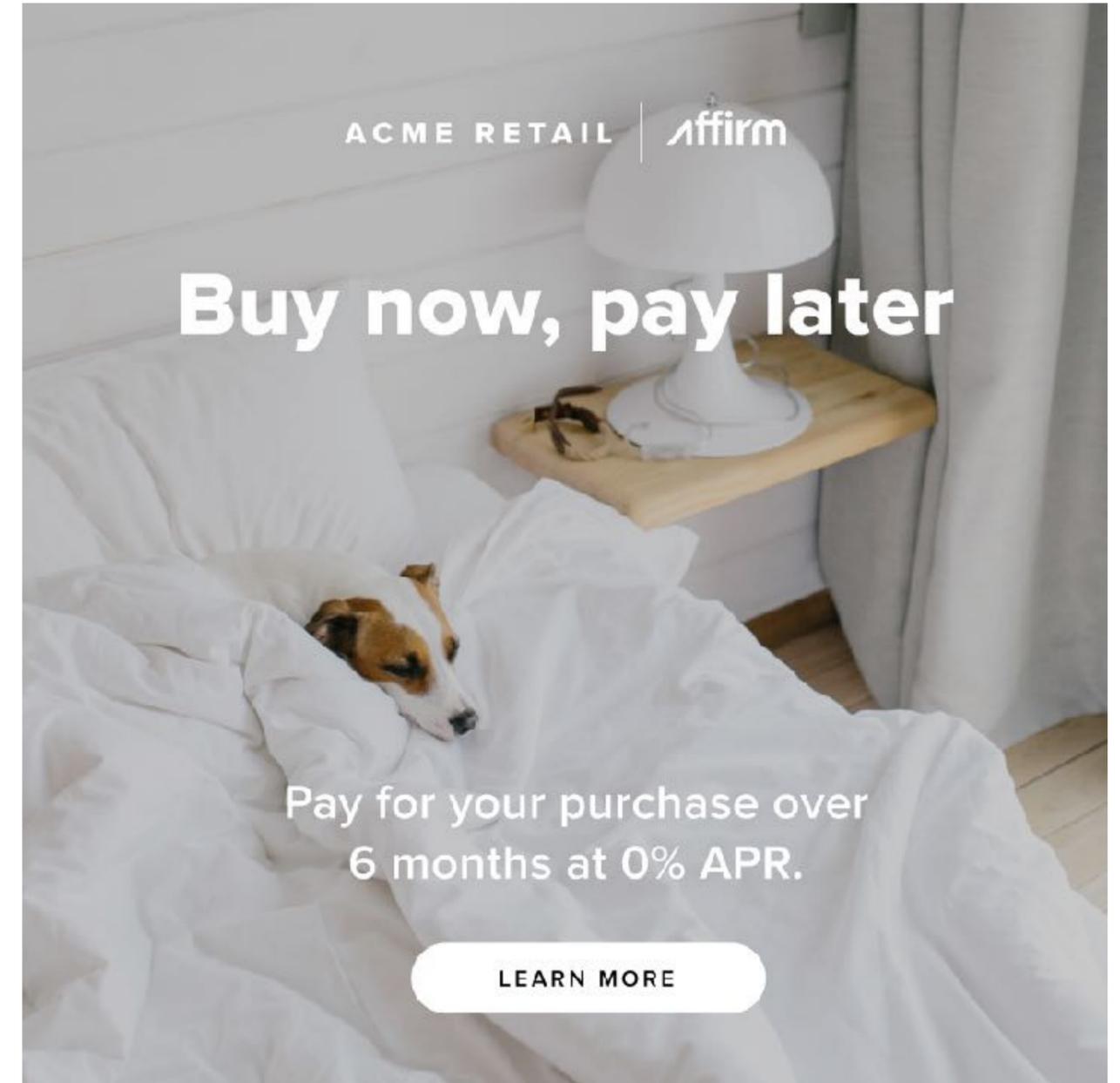


Example: no disclosure required

# When you **do** need a disclosure

You **do** need to include a disclosure when you mention one or more of the following “trigger” terms:

- Number of payments (e.g., 6 payments)
- Period of repayment (e.g., 6 months)
- Monthly payment amount (e.g., \$60/mo)
- Existence of a down payment



Example: “6 months” triggers a disclosure

# What goes in the disclosure?

The disclosure needs to include:

- Purchase price/loan amount
- Monthly payment amount
- Length of loan term
- APR
- Potential for down payment
- Any other restrictions (e.g., limited time, promo codes not valid with Affirm)

## **SAMPLE DISCLOSURE:**

As an example, a \$995 Acme purchase might cost \$83.34/mo over 12 months at 0% APR. A down payment may be required.  
[Offer expires mm/dd/yy.]

*Note: In your disclosure, you should always use the APR that appears in the Affirm modal on your site.*

# Where the disclosure goes

Ideally, the disclosure should go on the same creative as the trigger term—in close proximity, and in a similar font size.

## Pay over time, starting at 0% APR



or



or



For example, if you made a \$1,000 purchase you might pay \$166.67/mo over 6 months at 0% APR. A down payment may be required.

Example: disclosure on the creative

# Where the disclosure goes (continued)

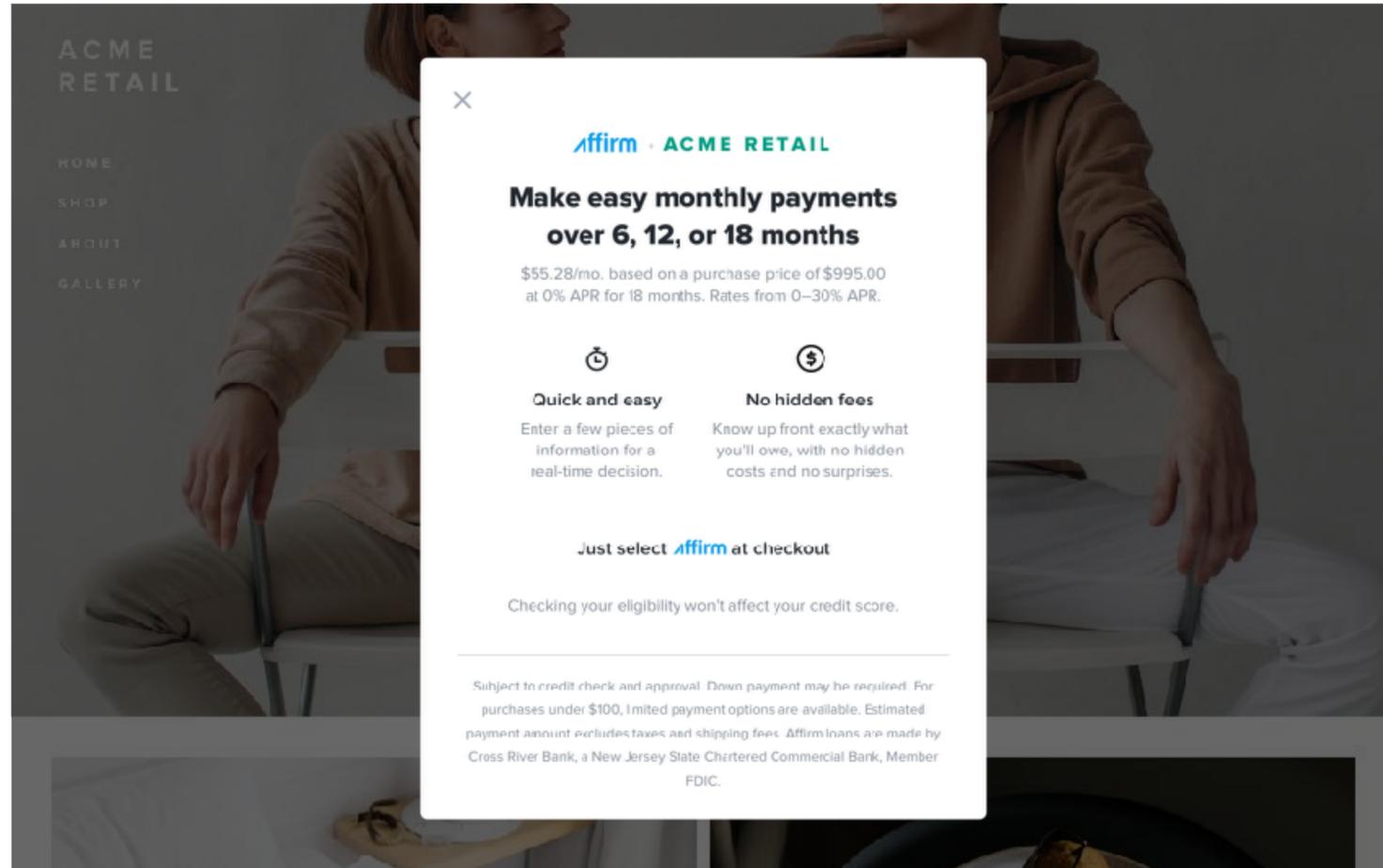
If there isn't room for the disclosure on the creative, you can include a clear "Learn more" link to a landing page that houses the disclosure and also includes Affirm's Universal Disclosure, shown below. The landing page can be either:

- a) **A product detail page** with the Affirm educational modal preloaded
  - This modal already has all disclosures, including Affirm's universal disclosure
- b) **An Affirm landing page** on your site
  - On this page, you will include the required disclosures (e.g. from slide 5), as well as the Affirm Universal Disclosure

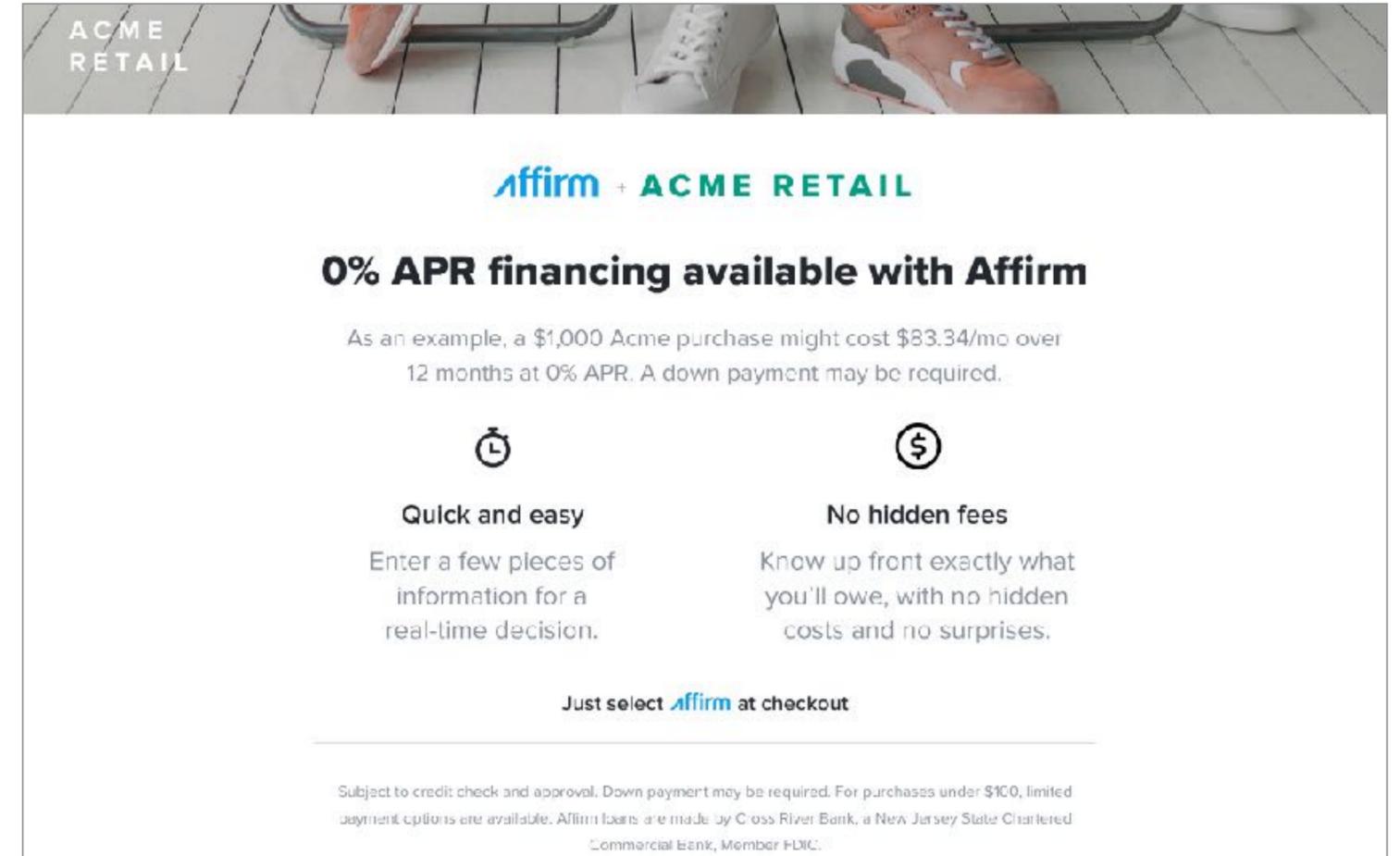
## **UNIVERSAL DISCLOSURE**

Subject to credit check and approval. Down payment may be required. For purchases under \$100, limited payment options are available. Affirm loans are made by Cross River Bank, a New Jersey State Chartered Commercial Bank, Member FDIC.

# Where the disclosure goes (continued)



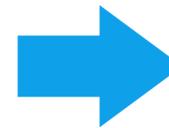
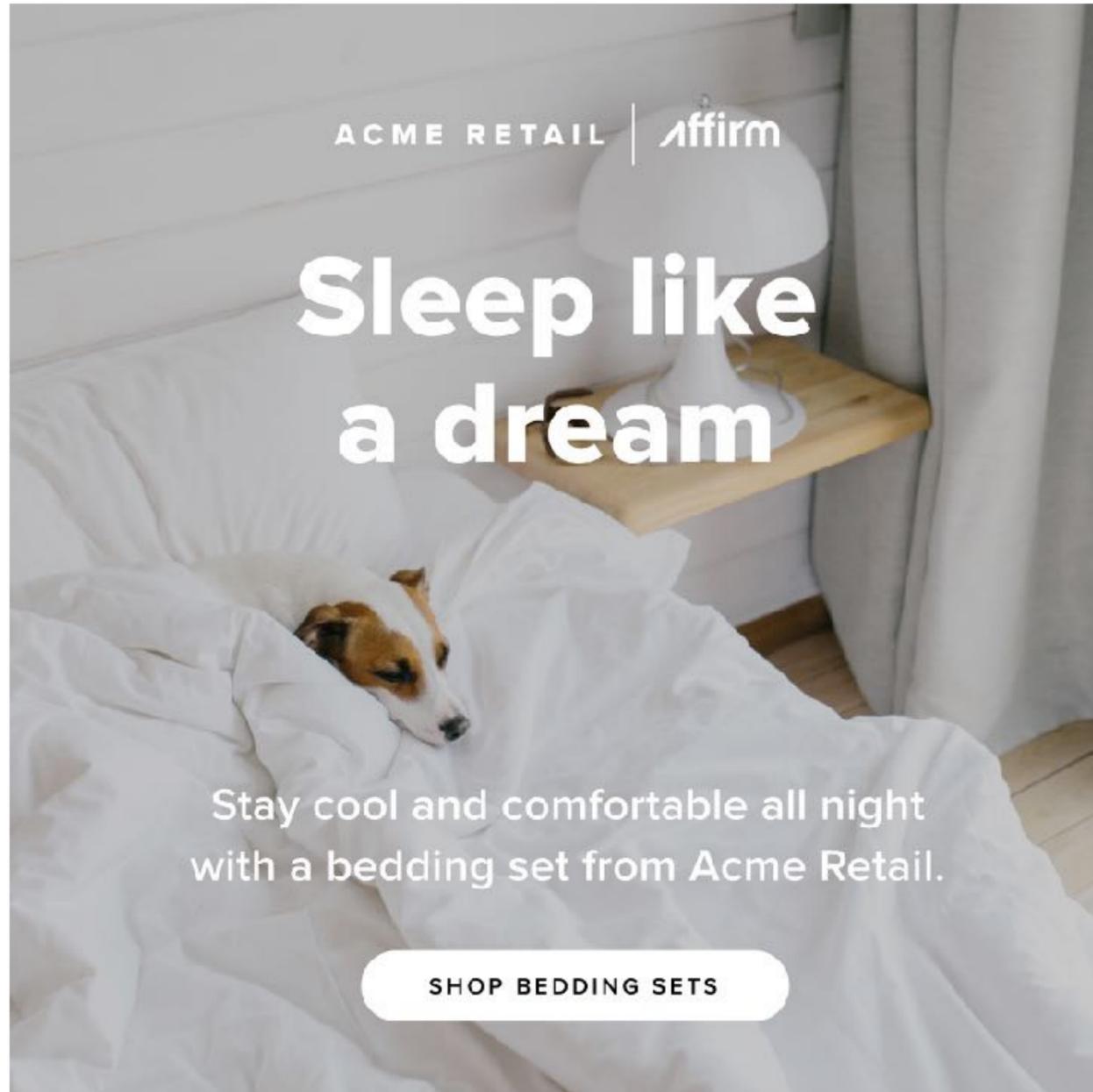
Example: preloaded Affirm modal



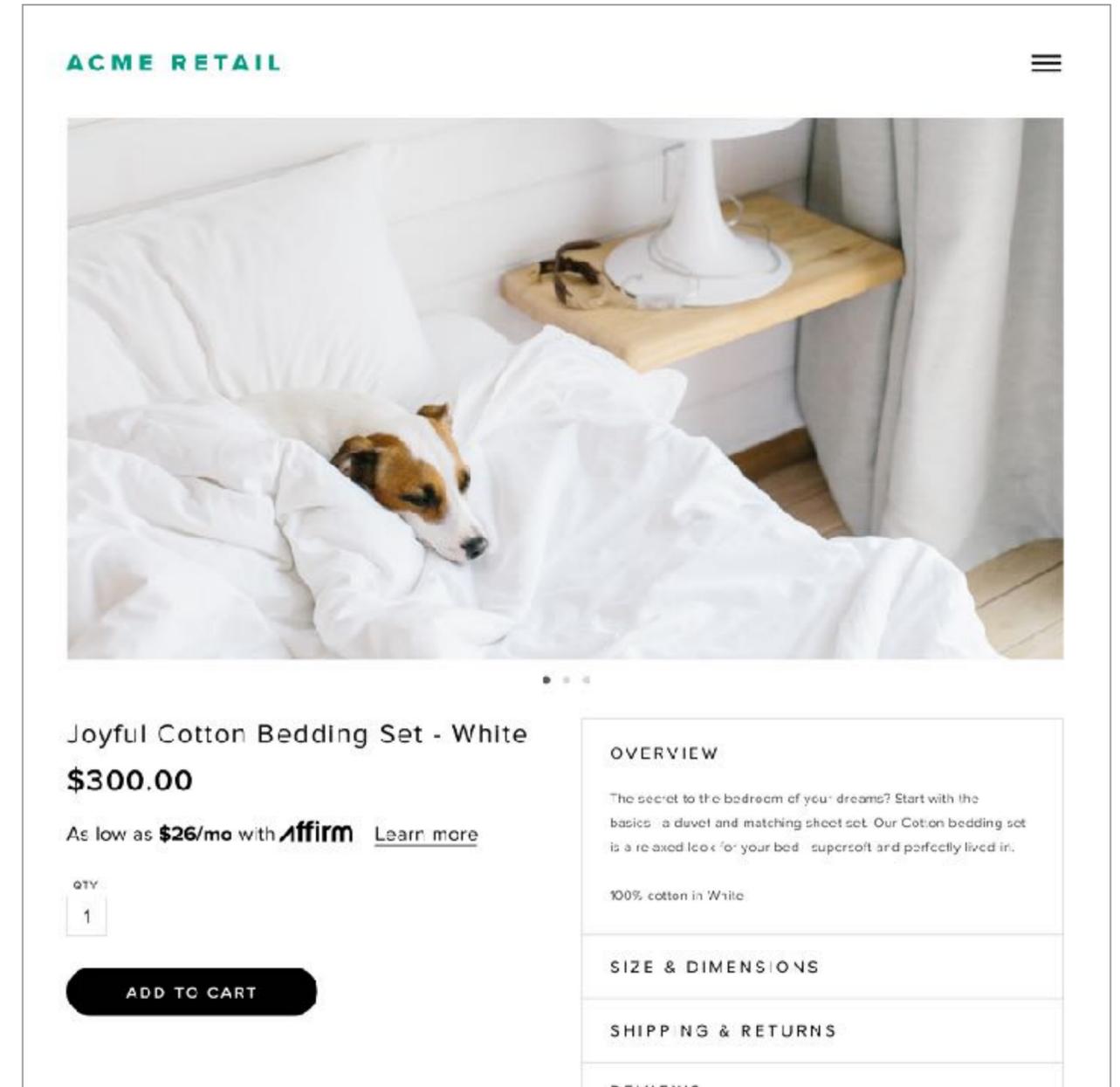
Example: Affirm landing page

# Sample flow: without trigger term

Ad

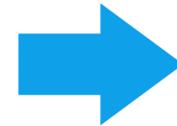
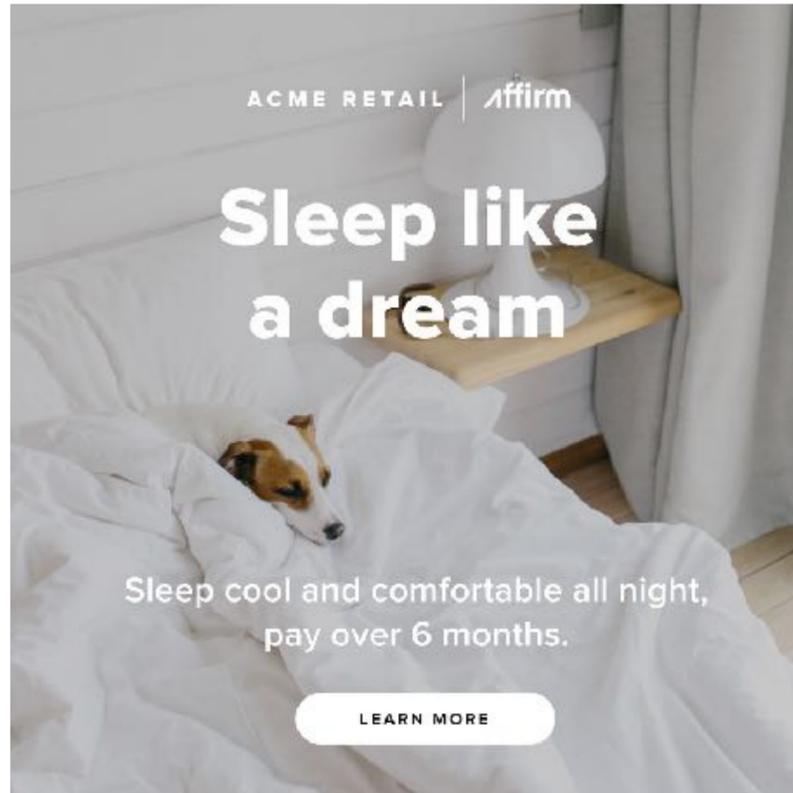


Shop page

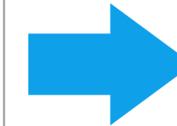
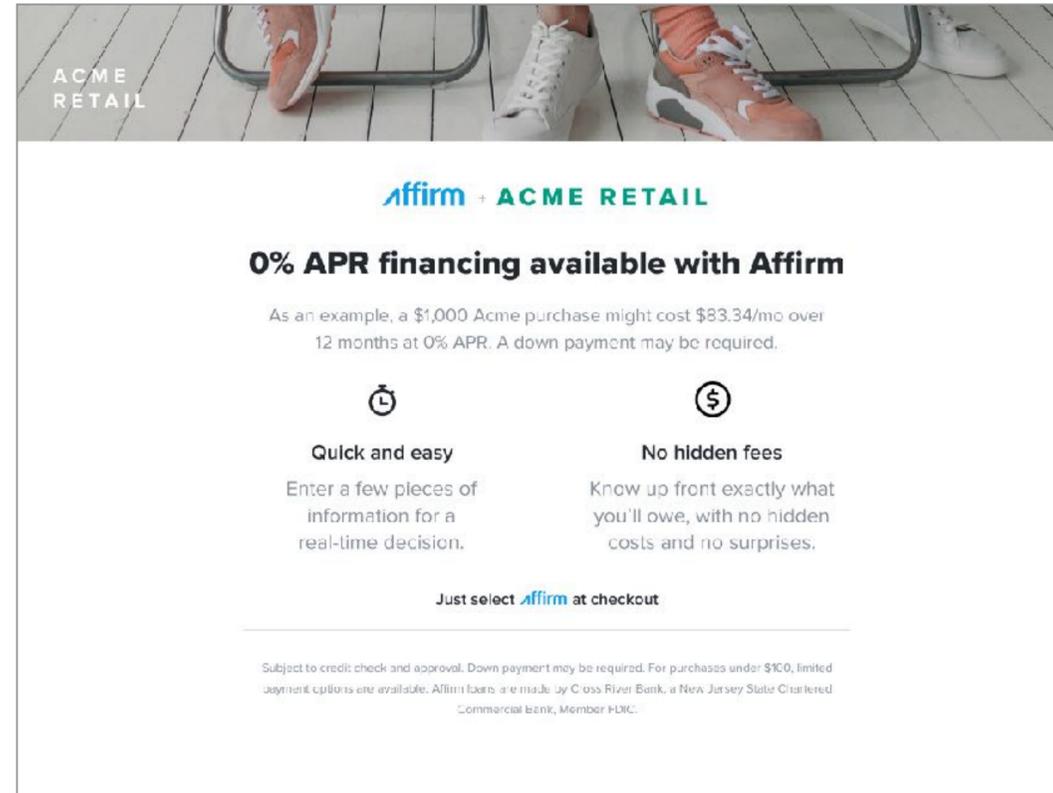


# Sample flow: with trigger term

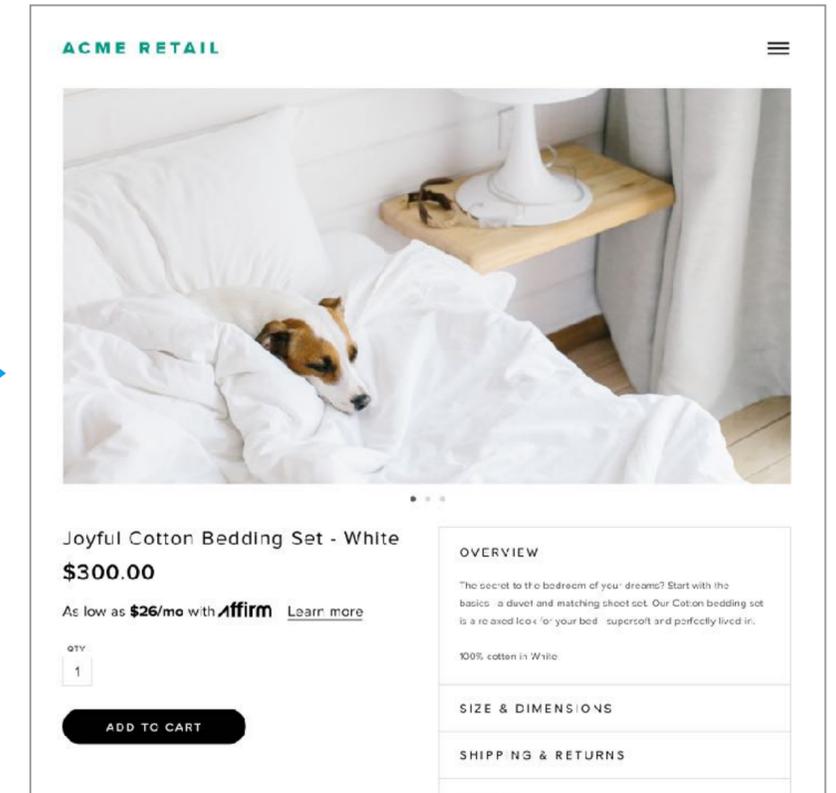
Ad



Landing page



Shop page



# Special guidance for emails

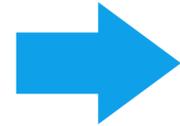
- For all emails that mention Affirm, Affirm's universal disclosure needs to be included in the email footer.
- If the subject line has a trigger term, a trigger disclosure needs to be clear and conspicuous in the body of the email.
- If the body of the email has a trigger term, a trigger disclosure needs to be clear and conspicuous and near the trigger term.

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# Sample flows: email

Trigger term in subject line, disclosure in body



**Get an Acme Retail Mattress for \$166/month**

Acme Retail <hello@acmeretail.com>

ACME RETAIL | *affirm*

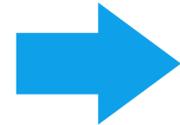
You can now get a \$995 Acme mattress for \$166/month over 6-months at 0% APR. A down payment may be required.

Sleep like a dream

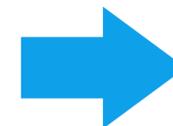
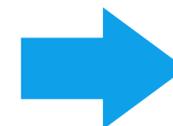
Stay cool and comfortable all night with a bedding set from Acme Retail.

SHOP BEDDING SETS

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Trigger term in body of email, disclosure by CTA



**Get an Acme Retail Mattress with 0% APR**

Acme Retail <hello@acmeretail.com>

Buy now, pay later

Pay for your purchase over 6 months at 0% APR.

You can now get a \$995 Acme mattress for \$166/month over 6-months at 0% APR. A down payment may be required.

LEARN MORE

Subject to credit check and approval. For purchases under \$100, limited payment options are available. Affirm loans are made by Cross River Bank, a New Jersey State Chartered Commercial Bank, Member FDIC.