

CCBill Compliance Checklist for Merchant Account Approval

Purpose of this document: This document details the most common reasons for delays in CCBill Merchant Account approval and the concerned issues you may come across. It explains the workarounds and features implemented on your site that circumvent these compliance requirements as well as responses you can give to CCBill to fasttrack the approval of your merchant account.

Questions

- 1) Why is the Model Subscription button visible for users who have cancelled their membership to a specific model but should be able to access content from that model profile until the actual end of their subscription period?

Response - Although the subscription buttons show up for users who have cancelled their subscription but have privileges to the content until the actual subscription end date, they will not be able to re-subscribe. They will be able to subscribe only after the actual end date of that cancelled subscription. When attempting to subscribe before this end date, they will be informed of this through an on-site notification.

- 2) How are the user memberships managed when a model leaves your website?

Response - If a model terminates her account from the platform (or the site admin deactivates it due to not meeting any legal regulations or site's TnC), the users subscribed to that model will lose access to all her content, including the PPV videos they may have purchased.

In such an instance, the site administrator will check the list of subscribers at the time of account deactivation and send an email to all informing of the same and provide two options - 1) To opt for subscription to another model of their choice for the remainder of the subscription period, or 2) Refund of their subscription amount proportional to the remaining paid days. Users can then share their banking info for the admin to refund the amount.

These disclaimers and terms are listed in the Terms of Service accessible by the users during signup.

Note: Please ensure this is one of the clauses in the Terms of Service document for Users that you upload in the admin panel. This will be accessible by users on the registration page.

QA: In the event, a model opts to leave the website or fails to upload new content on a regular basis, **how you will be managing existing memberships?** What practices are in place to determine which models may or may not offer annual billing (recurring or non-recurring) and what price points they are able to offer?

⇒ To remedy this, we currently changed yearly membership to 90-days membership as the client requested.

QB: At the time of the review, there was no cart limit present in the cart section of the website. We were able to add more than \$1000 worth of products to the cart. In order to be compliant, you **should set the cart limit to \$300.**

QC: Please **create a 'Contact Us' page** or section of the website, such as a footer, that will include the following information below, as this is a requirement for all US sites:

- Company Name, DBA, or Principal Name
- City
- State
- Country

Also, 1 of the following below is required:

- Email Address (Your own or Consumer Support (support@ccbill.com))
- Phone Number (Your own or Consumer Support (888.596.9279))
- Chat Link (Your own or Consumer Support
- Link to CCBill Support Page (<https://support.ccbill.com>)

QD: The subscription was purchased on 05/01. It is displaying the Renewal date of May 30, 2022, which is not the correct date. If the subscription is recurring every 30 days, the Renewal date, in this case, would be 05/31. It is also displaying the Expiry date 31/05/2022. At the moment, there is no expiry date as the subscription is still active, not canceled. **The expiry date should be displayed in case if the subscription was cancelled. Upon cancelation of a paid membership, access must continue for the full duration of time paid.**

QE: At the time of review Store section of the website is present (<https://nastygirlz.biz/store>). As we were informed **you will not be processing for tangible items with CCBill**, please either remove this section for the time being or add items to this page. In order to be CCBill compliant please ensure that all pages are 100% complete. Our bank would decline any incomplete page on the website.

QF: **Remove below 18 models filter option from the section "advanced search"**

QG: For all our base products: - **Once email verification is off => upon successful sign up, show the message "Your account is active, please login"**

QH: We need a system in place where the admin can interfere with payment status seen on the admin panel as well as give content permission to the users, like how we give subscriptions to users.

WHY WE NEED THIS IMPLEMENTATION=> Once failed payments are overridden by ccbill on request of users, users are still unable to play the purchased videos currently.

QI: Profiles offer monthly subscriptions; however, no content is behind a paywall. How will you be managing this with existing models and model accounts moving forward? Unfortunately, messaging with the model is not considered a reasonable value add and would not be a sufficient service to justify the use of a subscription.

⇒ To remedy this, we Shared a content creator doc with the client.

QJ: Don't activate a model on website unless you have an activated ccbill subaccount for her.

Qk. What are 0001, 0004, 0008, 0009 0001, 0012,0014, 0018, 0019 are being used currently? These are active, but you do not have any models/content tied with them,

which is against our AUP policy. The risk team requires clarification on this, as the entire account should be integrated properly before the payouts hold is released.

Ql. Upon canceling a subscription from further re-bills, our access to the paid content is removed instantly. An additional issue was that the "subscribe" button was still there

and we could pay again for the same model order 122148602000000019, this is a classic example of overcharging a customer, please ensure that customer will not have the ability to create two or more subscriptions for the same model at the time.

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Qk. Store digital products are able to be purchased twice. They should become unavailable to purchase by the same user once purchased.

Below points are related to the footer section that can be managed through admin

1) The **2257 statement** displayed on the following URL <https://happyfanx.com/page/u.s.c-2257> appears incomplete as it lacks valid contact information for the Custodian of Records. If a 2257 statement is present on a website, it must be 100% accurate and it must contain all the necessary information. It would be acceptable for your 2257 statement to include either a physical mailing address or e-mail address to the Custodian of Records. Please either correct the 2257 statement to include a contact to the Custodian of Records or completely remove the 2257 statement from the website.

2) **Appeals Policy**

All merchants need to maintain a process that enables any person depicted in the content to appeal to remove such content, and to have the content removed should the outcome of the investigation determine that consent was not given or is void under applicable law. Please also note that should there be a disagreement regarding an appeal, the merchants must allow such disagreement to be resolved by a neutral body so any potential statements contradicting this will need to be reworded or removed. Please ensure that the website details the Appeal procedure.

3) At the time of the review, the **complaints policy** is missing the following:

- Outline the process for review, and the appeals process for any decisions made. (for example, you may state that you "Have administrative staff going over the complaints, and in accordance with the Terms and conditions decide the validity of the complaint. After the decision has been made, the user may appeal the decision within the next 24 hours".)
- Outline the potential outcomes of any investigations/reviews. (for example this could state "When the decision is made, according to the decision itself, any infringing, illegal, abusive, or otherwise inappropriate content will be removed")

After the basic information regarding your complaints policy please place a contact for

users who wish to file a complaint.

Please be advised the examples listed, are just examples, and these should be thoroughly modified depending on your website's processes

- 4) At the time of the review, the website **had tangible products** offered to the consumers, our question is are these products being sold by your website or by models?
- 5) At the time of review the **"Terms and Conditions" page** (<https://happyfanx.com/page/terms-of-service>) displays the text "Wallet Credits are non-refundable, which means that you are not entitled to a refund of any unused Wallet Credits.". It is a violation of CCBill's AUP to advise a consumer that transactions are non-refundable or that refund requests must be made in a certain time frame as refund requests are handled on a case by case basis by CCBill's Consumer Support department. Please ensure that this statement is modified or removed in order to be CCBill compliant.
- 6) At the time of the review, we did not have valid login credentials with full access to the website content. In order for us to perform a complete compliance review, we will need you to provide us with valid login credentials with access to the premium and in general all website content.
- 7) At the time of review, it appears that images/videos located on the page <https://www.myfanporn.com/model/devmodel> bear the watermark of different websites, such as [vixen.com](https://www.vixen.com), brazzers, PHD sample, and Photodromm.com. Please be advised that it is a violation of Visa rules to display content with a different watermark than what is the registered website unless the copyrighted content is in your ownership. Please either remove any copyrighted images/videos from the website or please confirm that you own the copyrights/reseller agreements with the websites directly.
- 8) **share the user credentials to ccbill and that user must be accessing all contents of all models appearing on the website. [not only one model]**
- 9) **Add a disclaimer on tokens page**

<https://bombun.com/token-package>

Add any suitable message "You may spend your tokens to tip a model or on private calls with them"

10) Tokens should decrease instantly after being spent both on user and model dashboard.
[don't need to refresh]

11) Set the ccbill cancellation from user end. [fe]

12) take approval for 365 days membership.

