

Digital Marketing Compliance Roundtable

Digital Marketing Compliance Examples

Google:

Google Search: "Reverse Mortgage"

[Quick Reverse Mtg Calculator | Homeowners 62+ Are Eligible](#)

(Ad) www.seniorreversemortgage.com/calculator

Calculate Your Personalized Free Reverse Mortgage Quote In 1 Minute or Less! Discover What A Reverse Mortgage Could Do For You. Get Started Now. Age 62+ are eligible. Competitive rates.

[Top 5 Reverse Mortgage Lenders | Reviewed and Ranked](#)

(Ad) www.reviewcounsel.org/ReverseMortgage/Top-5

Compare the Best Reverse Mortgage Lenders In The Nation. Get A Free Info Kit. Independent Reviews.

[Top Reverse Mortgage Lender | The Lender You Choose Matters](#)

(Ad) www.quickreverse.com/LenderMatters/BetterLender

The lender you pick will directly impact your rates and fees. Choose your bank carefully. Don't pay broker fees. We're a direct lender with no middlemen. We pass the savings to you. Licensed Experts.

[\(Recommended\) | #1 Rated HUD Reverse Lender](#)

(Ad) lenders.reverse.mortgage/#1-Rated



America's #1 Rated Reverse Mortgage Lender. -14 Yrs. of Excellence. HUD Approved. A+ BBB. Highest Rated by BBB. 14 Years of Excellence. Every Customer is Family.

Are these Google Pay-Per-Click Ads compliant?

Rating	Hours
The Reverse Mortgage Institute 1.0 ★★★★★ (1) · Mortgage Lender Colorado Springs, CO · (719) 266-5500 Their website mentions reverse mortgage lenders	
Jan Jordan - Reverse Mortgage Specialist 5.0 ★★★★★ (3) · Mortgage Broker Loveland, CO · (970) 646-8908	
Reverse Mortgage Colorado No reviews · Mortgage Lender Denver, CO · (303) 467-7821 Their website mentions reverse mortgage lenders	
More places	

How about these Map listing which are automatically generated by Google for lenders in the area?

Search: "Reverse Mortgage Calculator"

[All](#) [News](#) [Shopping](#) [Videos](#) [Books](#) [More](#) [Settings](#) [Tools](#)

About 6,940,000 results (0.47 seconds)

#1 Reverse Mortgage Calculator | Instant Results
[Ad](#) calculator.reverse.mortgage/ (888) 325-6597
Proudly Presented by All Reverse Mortgage® - America's #1 Rated Reverse Mortgage Lender. Let ARLO™ Intelligently Find Your Perfect Reverse Mortgage! Instant Results, 100% Free.

Reverse Mortgage Calculator | Estimate Your Eligibility
[Ad](#) www.reversemortgageguides.org/Official
Try Our 2-Step Reverse Mortgage Calculator. Check Your Eligibility for Free. BBB Accredited Charity. Estimate Eligibility. Services: Reverse Mortgage Service, Home Equity Credit Line, Top Educational Resource.
[Estimate Your Loan Amount](#) · [Find the Right Lender](#) · [Reverse Mortgage Info](#)

Reverse Mortgage Calculator | Step 1: Use Our Calculator
[Ad](#) www.americanadvisorsgroup.com/ReverseMortgage/Calculator
★★★★★ Rating for americanadvisorsgroup.com: 4.5 - 160 reviews
Step 2: Get Your Free Info Kit. Find Out Your Potential Loan Amount Now. 97% Customer Satisfaction. Free Reverse Information. BBB Accredited. Top National Lender. Services: Reverse Mortgage Loans, Reverse Mortgage Info Kit, Online Calculator.

Reverse Mortgage Calculator | Calculate Your Rate Now
[Ad](#) www.onereversemortgage.com/
Calculate Your Reverse Mortgage. Learn More With One Click. A+ BBB Rating. Licensed Experts. Top Lender. Types: Fixed Rate HECM, Adjustable Rate HECM, Line of Credit, Reverse for Purchase.

Reverse Mortgage Calculator
<https://www.reversemortgage.org/About/Reverse-Mortgage-Calculator>
How much may a reverse mortgage offer you? To find out answer these questions: You can use your "Tab" key to move from box to box. \$ signs and commas are ...

Reverse Mortgage Calculator | AAG - American Advisors Group
<https://www.americanadvisorsgroup.com/reverse-mortgage-calculator/>
Use AAG's Reverse Mortgage Calculator to estimate the funds available to you based on your home value, equity, your age and more. Request your free ...

Reverse Mortgage Calculator
<https://www.mortgagecalculator.org/calcs/ReverseMortgage.html>
Reverse Mortgage Calculator. Do you want to estimate what your remaining equity balance will be a few years out from today? Use this free calculator to help ...

Are these Google Pay-Per-Click Ads for a Mortgage Calculator compliant?

How about automatically generated Google "Organic" Page Listings?

People also ask	
How much money do you get from a reverse mortgage?	▼
How does a reverse mortgage work example?	▼
Are reverse mortgages a good deal?	▼
What is the maximum amount of a reverse mortgage?	▼

Feedback

People also ask

How much money do you get from a reverse mortgage? ^

For example, if your home is worth **\$500,000** and your PLF is .50, you can borrow **\$250,000**. Find out how much you could potentially borrow using our reverse mortgage lump sum calculator. These four factors effect your HECM payout: The age of the youngest borrower.

[How Much Can You Borrow on a Reverse Mortgage? | LendingTree](https://www.lendingtree.com/home/reverse/amounts/)
<https://www.lendingtree.com/home/reverse/amounts/>

Search for: [How much money do you get from a reverse mortgage?](#)

How about other forms of search content automatically generated by Google?

Facebook:

Facebook Page:

Is a Business Facebook Page in itself a form of advertising?

What disclosures (if any) MUST be made on the Facebook Page - Where on the page can these go?

Are Facebook Ads that Promote the Business Facebook Page (For Getting New Facebook Followers) Advertising?

How about when someone “searches” for “Reverse Mortgages” in Facebook. Are automatically generated listings ads?

10 Tips to Control Expenses in Retirement <https://buff.ly/2MLGDYK>



31 People Reached 0 Engagements 0 Clicks [Boost Post](#)

Posts to Facebook PAGES:

Is a link to a third-party article an ad?

How about if it's “Boosted” to an audience that is in your area but doesn't follow your page?

- Reverse Mortgage** (Tucson, Arizona) · Mortgage Brokers · 571 like this
- One Reverse Mortgage** (San Diego, California) · Mortgage Brokers · 2.8K like this
- Reverse Mortgage Funding LLC** (Bloomfield, New Jersey) · Finance Company · 1.2K like this
- Reverse Mortgage Daily** (Chicago, Illinois) · Loan Service · 1.5K like this
- All Reverse Mortgage** (Orange, California) · Loan Service · 801 like this
- Reverse Mortgage** · Product/Service · 45 like this
- Deborah Nance Reverse Mortgage Specialist & Host of Reverse Mortgage Radio** (Finance Company) · 354 like this
- Reverse Mortgages.com** (Columbia, Missouri) · Loan Service · 43K like this
- Mary Jo Lafaye Reverse Mortgage Advisor** (San Rafael, California) · Financial Planner · 134 like this
- Understanding Reverse Mortgages** (Saint Paul, Minnesota) · Financial Service · 141 like this
- Reverse Mortgage Guru** (Tustin, California) · Mortgage Brokers · 331 like this

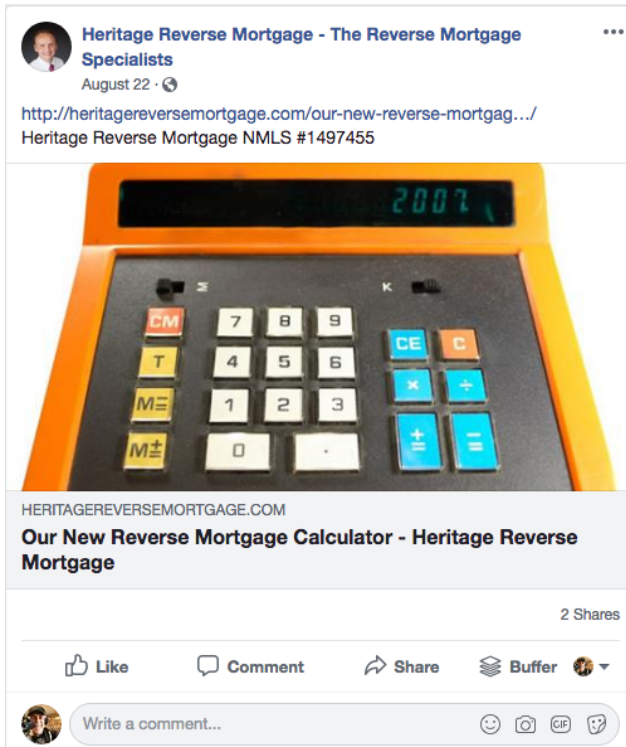
How about if when the person goes to the article - ex. (in U.S. News & World Report) and a banner displays at the bottom of the article with a call to action .

GOLDEN HERITAGE FINANCIAL [sniply](#) [Learn More](#)

Put One of the Most Powerful Retirement Tools For Homeowners 62 & Older To Work For You

How about posts that link to third-party news articles that discuss Reverse Mortgages?

How about a post on the Facebook Page (that may also appear in a current follower's news feed) or an ad that promotes a call to action: Note this is a post - not an ad!



How about posts that link to content (blog, landing page, website page, etc.) produced by the Reverse Mortgage Lender?

Does each and every post to a Facebook Page need to be reviewed for compliance and approved in writing prior to use?

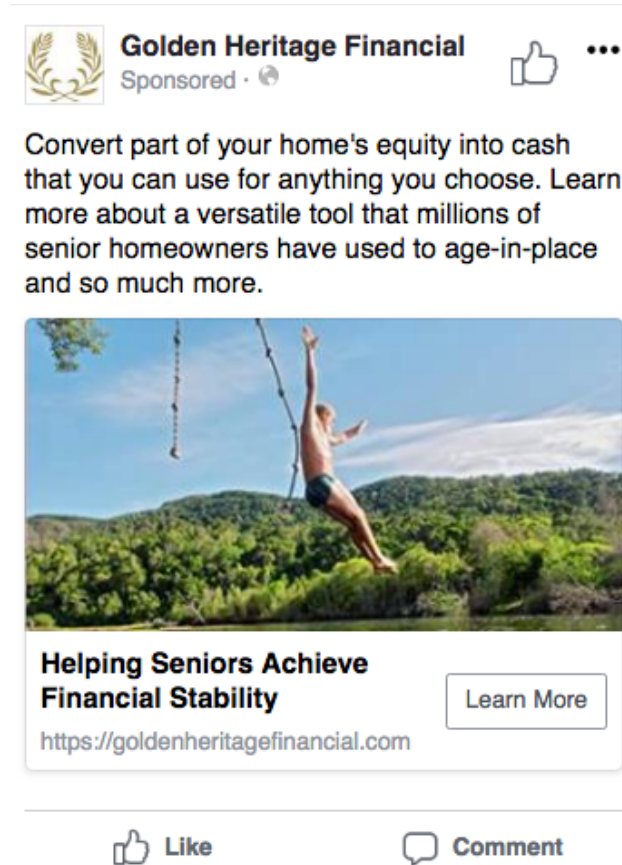
Here's a comment from a Compliance Officer:

It is my understanding that the Facebook ads will appear as "sponsored by" "ABC Reverse Mortgage Lender NMLS# 1234" in a consumers' news feeds (not on a Company page). This could be problematic as the ads limit the amount of text that can be displayed and do not include all the items required in advertising (Equal Housing language or logo, state specific licensing language, etc.). The ad would require a click-through that eventually leads to somewhere with more information on reverse mortgages and disclosures. The issue a regulator may have with this is that a consumer views the ad in Facebook and may not click the link to view the guide. Therefore, the consumer will not see the required disclosures.

I cannot guarantee that a regulator will be okay with you only including all necessary disclosures in a guidebook, video, webinar etc. and not on each Facebook ad. Regulators are becoming more strict with social media and are particularly stringent with reverse mortgage advertising.


Here's an example of a Facebook Lead Ad (that captures lead information within the Advertiser's Facebook account). What are the compliance issues with it?

#1: What the Consumer initially sees in their News Feed.



Golden Heritage Financial
Sponsored · 🌐

Convert part of your home's equity into cash that you can use for anything you choose. Learn more about a versatile tool that millions of senior homeowners have used to age-in-place and so much more.




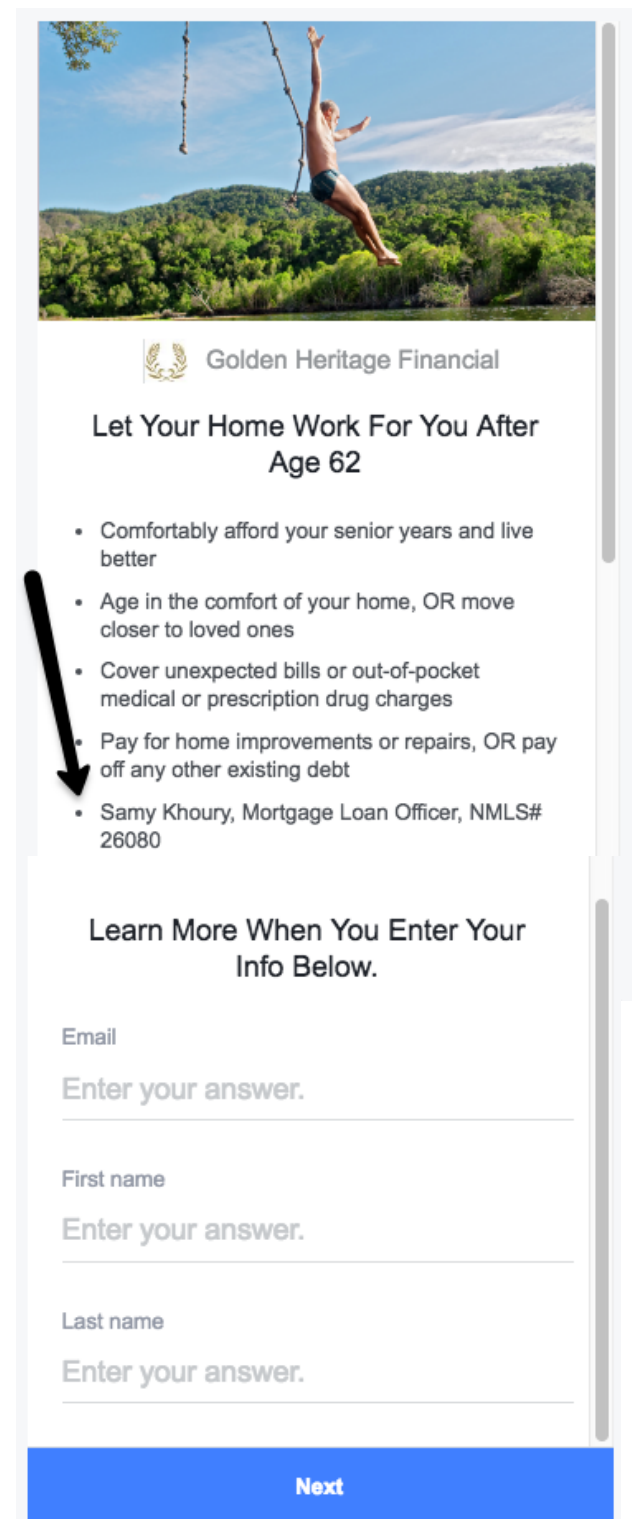
Helping Seniors Achieve Financial Stability
<https://goldenheritagefinancial.com>

Learn More

Like Comment

Is Facebook advertising that promotes to “Learn More” (about possible benefits) and never mentions Reverse Mortgages or HECMs subject to reverse mortgage compliance disclosures?

#2: If they “click” the “Learn More button they go to a second screen:



Golden Heritage Financial

Let Your Home Work For You After Age 62

- Comfortably afford your senior years and live better
- Age in the comfort of your home, OR move closer to loved ones
- Cover unexpected bills or out-of-pocket medical or prescription drug charges
- Pay for home improvements or repairs, OR pay off any other existing debt
- **Samy Khoury, Mortgage Loan Officer, NMLS# 26080**

Learn More When You Enter Your Info Below.

Email
Enter your answer.

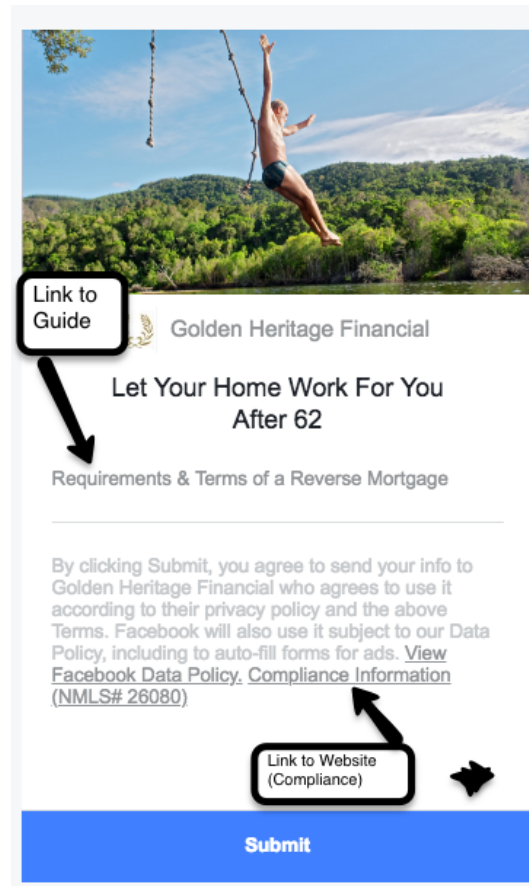
First name
Enter your answer.

Last name
Enter your answer.

Next

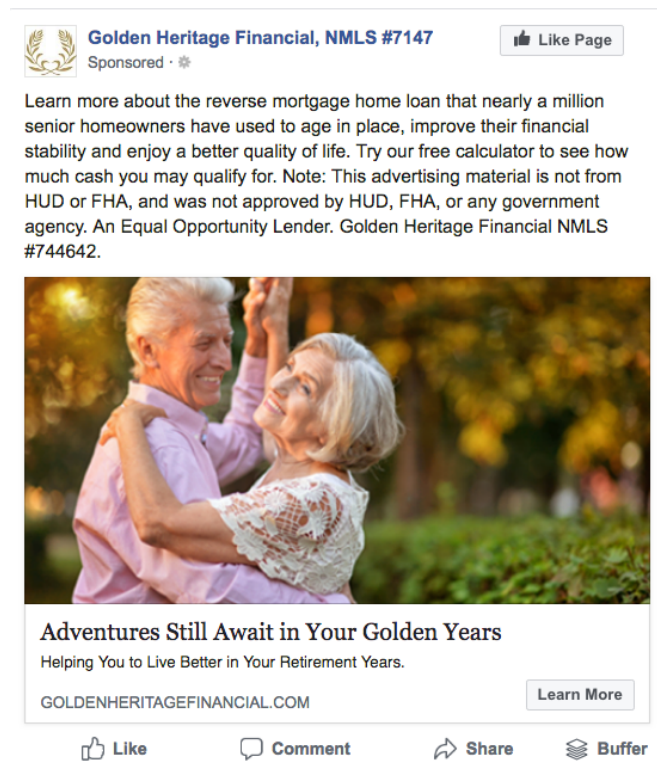
#3: If they “click” Next:

When they click Submit, the lead is generated in Facebook and the user is directed to the company website.



The image shows a Facebook advertisement for Golden Heritage Financial. At the top is a photo of a person swinging on a vine in a park. Below the photo is the company name "Golden Heritage Financial" and the headline "Let Your Home Work For You After 62". Underneath is the sub-headline "Requirements & Terms of a Reverse Mortgage". A text block contains a disclaimer: "By clicking Submit, you agree to send your info to Golden Heritage Financial who agrees to use it according to their privacy policy and the above Terms. Facebook will also use it subject to our Data Policy, including to auto-fill forms for ads. View Facebook Data Policy, Compliance Information (NMLS# 26080)". At the bottom is a blue "Submit" button. Annotations include a box labeled "Link to Guide" with an arrow pointing to the "Requirements & Terms" link, and another box labeled "Link to Website (Compliance)" with an arrow pointing to the "View Facebook Data Policy, Compliance Information" link.

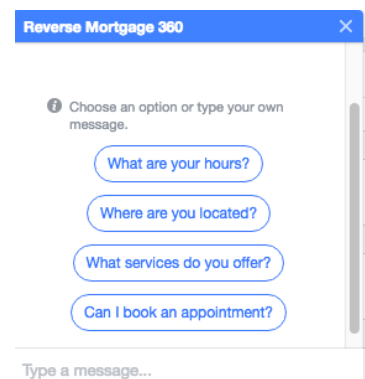
Facebook Traffic Ads - (The Ad sends leads from Facebook to Off-Facebook Landing PAGES)



The image shows a Facebook advertisement for Golden Heritage Financial. It features the company logo and name "Golden Heritage Financial, NMLS #7147" with a "Like Page" button. The text reads: "Learn more about the reverse mortgage home loan that nearly a million senior homeowners have used to age in place, improve their financial stability and enjoy a better quality of life. Try our free calculator to see how much cash you may qualify for. Note: This advertising material is not from HUD or FHA, and was not approved by HUD, FHA, or any government agency. An Equal Opportunity Lender. Golden Heritage Financial NMLS #744642." Below the text is a photo of an elderly couple embracing. At the bottom, it says "Adventures Still Await in Your Golden Years", "Helping You to Live Better in Your Retirement Years.", and "GOLDENHERITAGEFINANCIAL.COM" with a "Learn More" button. At the very bottom are icons for "Like", "Comment", "Share", and "Buffer".

Here’s an example of a Facebook Traffic ad that has some compliance disclosures in it.

Any issues if when someone goes to a Facebook page the “message box” pops up?



The image shows a Facebook message box titled "Reverse Mortgage 360". It contains a prompt: "Choose an option or type your own message." Below the prompt are four buttons with the following text: "What are your hours?", "Where are you located?", "What services do you offer?", and "Can I book an appointment?". At the bottom of the message box is a text input field with the placeholder "Type a message..."

What Type Of Property?



Talk with a real person 877-605-3117

[Privacy Policy](#) | [Terms of Use](#) | [Licenses & Disclosures](#)

LendingTree, LLC is a Marketing Lead Generator and is a Duty Licensed Mortgage Broker, as required by law, with its main office located at 11119 Rushmore Dr., Charlotte, NC 28227, Telephone Number 866-501-2397 (TDD/TTY), NMLS Unique Identifier #1136. LendingTree, LLC is known as LT Technologies in lieu of true name LendingTree, LLC in NY. LendingTree technology and processes are patented under U.S. Patent Nos. 6,385,594 and 6,611,816 and licensed under U.S. Patent Nos. 5,995,947 and 5,758,328. © 2018 LendingTree, LLC. All Rights Reserved. This site is directed at, and made available to, persons in the continental U.S., Alaska and Hawaii only.

Landing Pages:

What kind of disclosures etc. are required on Landing Pages? Can they be via links to supplemental pages like on this Landing Page?



Your Home's Equity Can Work For You, After Age 62.

Would You Like to Improve Your Financial Stability During Retirement?*

Try our calculator below to get an instant estimate of the amount of cash you can get from the equity you've earned in your home.

Or, for immediate assistance call 800-779-1020 to speak with a specialist.

Instantly Calculate Your Estimated Reverse Mortgage Proceeds

Takes Less Than 2 Minutes - No Sensitive Information Required

Property Location

City

State

Zip Code



How about if the compliance disclosures are on the bottom of the landing page?



By submitting this request for information, I hereby provide my signature, expressly consenting to receive information by email or via phone on behalf of www.goldenheritagefinancial.com.


Golden Heritage Financial NMLS# 744642 is a dba of HighTechLending, Inc., NMLS #7147 Licensed by the Department of Business Oversight under the California Residential Mortgage Lending Act #4130937, NMLS #7147. Licensed in NJ #7147, NV #4517, OR #ML4386, WA #7147, 2030 Main Street, Suite #350, Irvine, CA 92614. NMLS Consumer Access: www.nmlsconsumeraccess.org

This material is not provided by, nor was it approved by the Department of Housing & Urban Development (HUD) or by the Federal Housing Administration (FHA).

*Borrower must continue to pay property taxes, homeowner's hazard insurance policy, HOA fees if applicable, and maintain the property equal or better to when the loan was closed. Borrower must occupy the home as a principal residence. Consult your Tax Advisor. This is not a commitment to lend.

Your information is secure—we'll never sell or share it.
© 2018 Golden Heritage Financial | [Privacy Policy](#)

Here's a landing page from a "Learn More" ad that never mentions reverse mortgages or HECMs — Are there any different compliance requirements for this?



Your Home's Equity Can Work For You, After Age 62.



Would You Like to Improve Your Financial Stability During Retirement?*

We Can Help You to Live Better in Your Retirement Years.

- ✓ Age in the comfort of your own home, or move closer to loved ones.
- ✓ Cover unexpected bills or out-of-pocket medical or prescription drug charges.
- ✓ Pay for in-home care
- ✓ Pay for home improvements or repairs; or pay off any other existing debt.
- ✓ Be free to choose how to receive and use your money.

[Learn More](#)

Or, for immediate assistance call 800-779-1020 to speak with a specialist.




Your Home's Equity Can Work For You, After Age 62.

Would You Like to Improve Your Financial Stability During Retirement?*

We Can Help You to Live Better in Your Retirement Years.

- ✓ Age in the comfort of your own home, or move closer to loved ones.
- ✓ Cover unexpected bills or out-of-pocket medical or prescription drug charges.
- ✓ Pay for in-home care
- ✓ Pay for home improvements or repairs; or pay off any other existing debt.
- ✓ Be free to choose how to receive and use your money.

[Learn More](#)



Get Our Mortgage Solutions For Seniors Guide Now.

Fill out the form and click the "Download Now" Button - There's absolutely no obligation!

Email Address

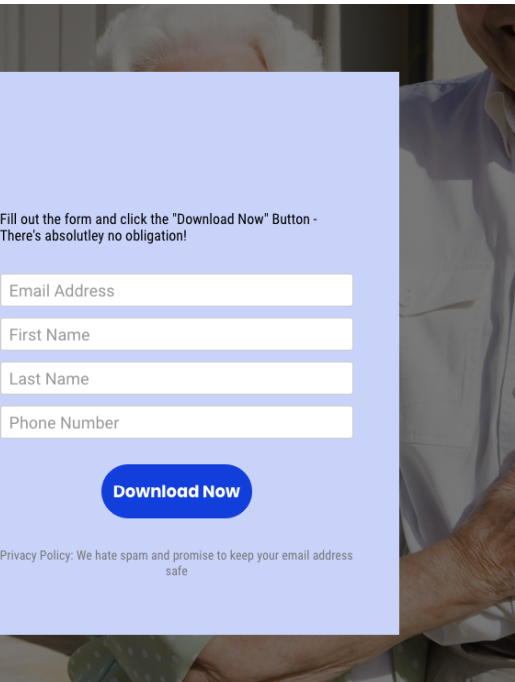
First Name

Last Name

Phone Number

[Download Now](#)

Privacy Policy: We hate spam and promise to keep your email address safe





Mary Jo Lafaye Reverse Mortgage Advisor

August 22 · 🌐

Join us for a **FREE Webinar!**
Money Guide Pro: Software Solutions for Improving Retirement Outcomes with the Housing Asset

WHEN:
Wed, August 29th, 2018 @ 10:00 PST

Register here:
<https://register.gotowebinar.com/regist.../8269318493319956995>

Learn more at my blog:
<http://62cashflow.com/money-guide-pro-webinar/>



Like Comment Share Buffer

See All

How about a post or an ad when it goes to a webinar signup page?

What are the compliance requirements for the actual webinar?



Money Guide Pro: Software Solutions for Improving Retirement Outcomes with the Housing Asset

Join host Shelley Giordano, Founder and Chair of the Funding Longevity Task Force and Daniel Latham, Account Manager at Money Guide Pro.

During this webinar, Daniel will demonstrate new capabilities in Money Guide Pro software, the "#1 Financial Planning Software for 10 Straight Years."

One of the main limitations in including the housing asset in financial planning discussions is a lack ... [More](#)

*Required field

First Name*	<input type="text"/>	Last Name*	<input type="text"/>
Email Address*	<input type="text"/>	City*	<input type="text"/>
State/Province*	<input type="text"/>	Zip/Postal Code*	<input type="text"/>
Phone Number*	<input type="text"/>	Organization*	<input type="text"/>
Job Title*	<input type="text"/>		

Webinar organizers are prohibited from soliciting confidential personal information (credit card information, social security numbers, etc.) in the registration form. This questionnaire is not intended to handle sensitive data.

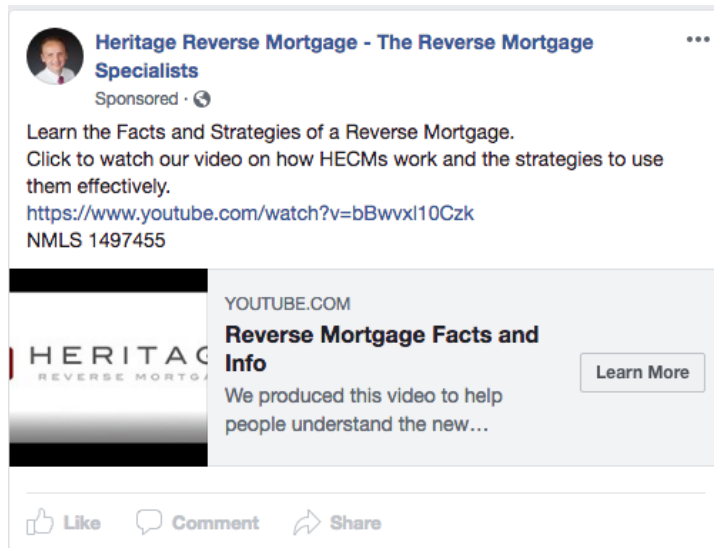
Please provide the name of the RFS Loan Officer who invited you to today's webinar. *

By clicking this button, you submit your information to the webinar organizer, who will use it to communicate with you regarding this event and their other services.

Register

Or for a Youtube Video? (Note: in this example, there are compliance disclosures at the very end of the video).

<https://www.youtube.com/watch?v=bBwvxl10Czk>



A screenshot of a Facebook post from the page "Heritage Reverse Mortgage - The Reverse Mortgage Specialists". The post is marked as "Sponsored" and includes a profile picture of a man in a suit. The text of the post reads: "Learn the Facts and Strategies of a Reverse Mortgage. Click to watch our video on how HECMs work and the strategies to use them effectively." Below this is the URL "https://www.youtube.com/watch?v=bBwvxl10Czk" and the NMLS number "NMLS 1497455". The video player area shows a thumbnail with the "HERITAGE REVERSE MORTGAGE" logo and the title "Reverse Mortgage Facts and Info". A "Learn More" button is visible next to the video title. At the bottom of the post are the interaction buttons: "Like", "Comment", and "Share".

Heritage Reverse Mortgage - The Reverse Mortgage Specialists
Sponsored · 🌐

Learn the Facts and Strategies of a Reverse Mortgage.
Click to watch our video on how HECMs work and the strategies to use them effectively.
<https://www.youtube.com/watch?v=bBwvxl10Czk>
NMLS 1497455

HERITAGE REVERSE MORTGAGE
Reverse Mortgage Facts and Info
We produced this video to help people understand the new...
[Learn More](#)

👍 Like 💬 Comment ➦ Share

Emails:

What are the compliance disclosures required in emails about reverse mortgages that are sent to previously generated prospects and leads?

Here's an example of an email that was reviewed by a compliance officer — who noted that the items in red must be removed from the email and the items in blue are disclosure that the compliance officer insisted must be in the body of the email and not at the end of the email:

Hi Joe,

It's _____, with _____.

As a member of your dedicated reverse mortgage lending team serving mortgage loan originator focusing on reverse mortgages in _____, I would love the opportunity to talk with you about the many benefits available from the Reverse Mortgage program that President Ronald Reagan signed into law in 1988 reverse mortgages.

I've seen thousands of lives transformed by these loans and feel strongly that every eligible senior deserves to know if they may qualify and evaluate how this program may be able to possibly make a positive difference in their financial life help you.

Here are just a few of the possible benefits of a Reverse Mortgage:

* Upon taking out a reverse mortgage you continue to maintain ownership of your home.

*****However, at the conclusion of a reverse mortgage, you must repay the loan and may have to sell the home or repay the loan from other proceeds. Further, failure to pay property taxes and homeowner's insurance may result in loss of the home or foreclosure.

* You do not have to pay a monthly mortgage payment with a reverse mortgage.

*****However, you are responsible for property taxes, hazard insurance and home maintenance, and failure to pay these amounts may result in the loss of the home.

* You are protected no matter what happens to the housing market.

* You may choose how to receive and use your money.

* Social Security and Medicare benefits are never affected.

* You are more protected with a Reverse Mortgage than with a Home Equity Line of Credit.

***** You should also know that charges will be assessed with the loan, including an origination fee, closing costs, mortgage insurance premiums and servicing fees. Further, the loan balance grows over time and interest is charged on the outstanding balance. Interest on a reverse mortgage is not tax-deductible until you make partial or full re-payment.

Please Click [here](#) to watch an NBC News video about how reverse mortgages are helping senior homeowners. Please note that this video is not from HUD or FHA, and was not approved by HUD, FHA, or any government agency.

Joe, I'd love to [explore the possibility of making a positive difference in your financial life](#). discuss the reverse mortgage program with you.

Give me a call today at (425)455-8466 for a brief, no-obligation discussion. Or, just email me back your phone number and I'll give you a call. It will only take me a few minutes to provide you with an estimate of the loan amount for which you may qualify.

(a) As long as you meet the ongoing obligation to pay property taxes, property insurance, HOA dues if applicable, maintain your home and comply with the loan terms.

(1) At the conclusion of a reverse mortgage, the borrower must repay the loan and may have to sell the home or repay the loan from other proceeds;

(2) Charges will be assessed with the loan, including an origination fee, closing costs, mortgage insurance premiums and servicing fees;

(3) The loan balance grows over time and interest is charged on the outstanding balance;

(4) The borrower remains responsible for property taxes, hazard insurance and home maintenance, and failure to pay these amounts may result in the loss of the home; and

(5) Interest on a reverse mortgage is not tax-deductible until the borrower makes partial or full repayment.

This is an advertisement. The Company's advertising material is not from HUD or FHA, and was not approved by HUD, FHA, or any government agency.

If you'd like to unsubscribe and stop receiving these emails [click here](#).