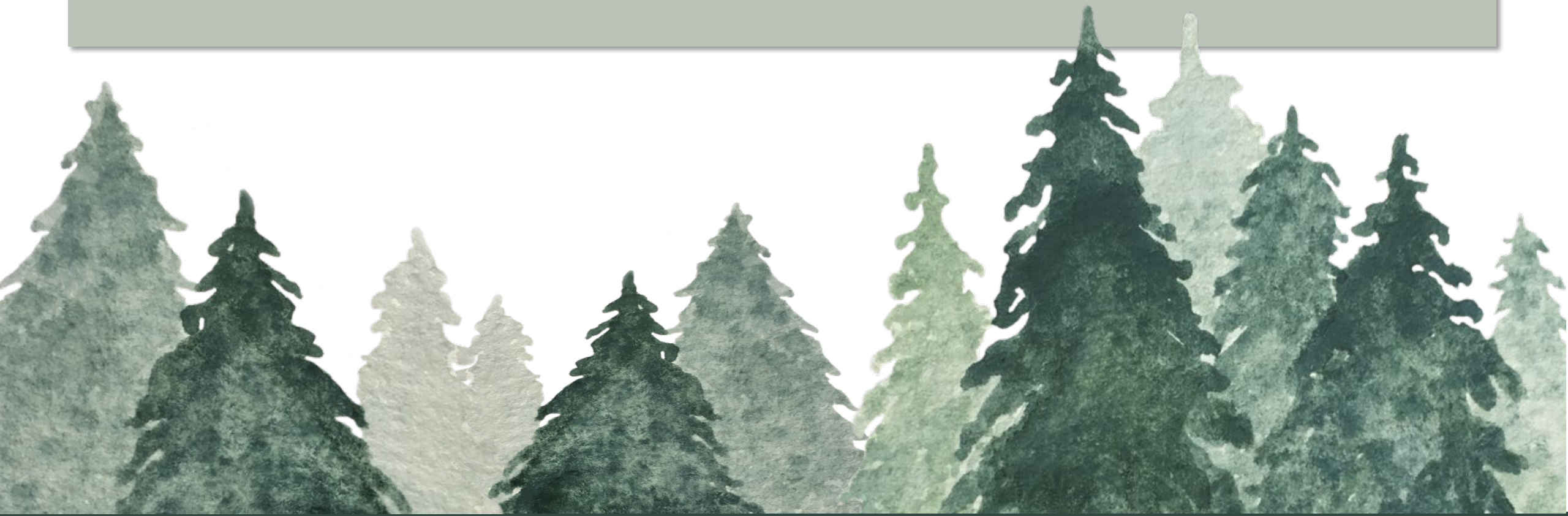


Advertising & Social Media Review





Speakers



Marilyn Osborne

*Senior Compliance Officer
Advertising Review*

Corebridge Financial



Janelle Peterson

*Senior Compliance
Consultant*

**Sammons Financial
Group**



Megan Sedberry

*Senior Compliance
Associate*

BrightHouse Financial



Carla Strauch

*Senior Vice President,
Compliance & Ethics*

CEFLI



Agenda

- 🌲 **Advertising Review: Company Approach**
- 🌲 **Social Media: Company Approach**
- 🌲 **Technology: Leveraging Technology Platforms**
- 🌲 **Current Challenges: Advertising Reviews and Social Media Monitoring**
- 🌲 **Artificial Intelligence: Use by Compliance**
- 🌲 **Key Compliance Controls: Biggest Challenges**
- 🌲 **Q&A**
- 🌲 **Additional Resources**

Advertising Review



- ↑ What Products are Offered?
- ↑ What Distribution Channels are Utilized?
- ↑ Who May Submit Advertising For Review?
- ↑ Who Are Your Regulatory Stakeholders (the states, FINRA or both)?
- ↑ What is Your Annual Volume of Ads and/or the FTE Count Supporting the Review Process?



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Social Media

- 🌲 How is Social Media Used at Your Company?
- 🌲 Who Creates the Content?
- 🌲 What is the Review Process?





BrightHouse
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Company Approach

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Company Approach

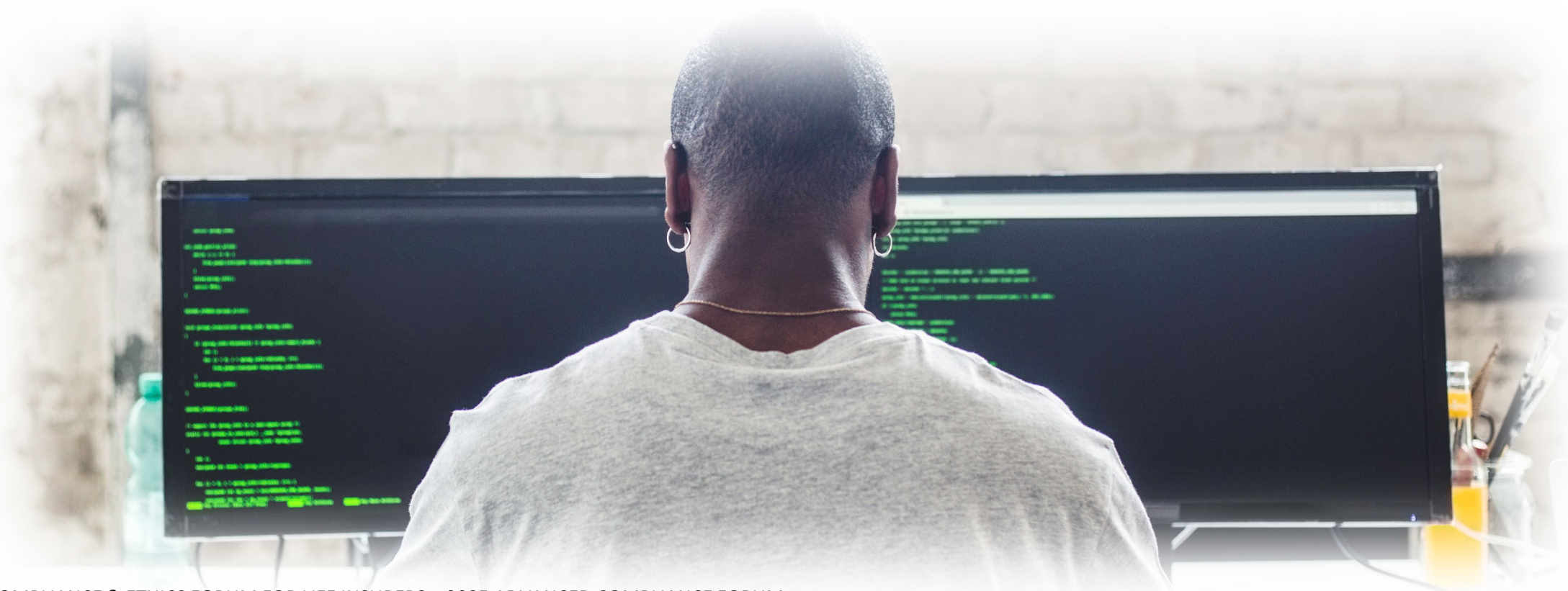
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Technology



Technology – Ad Review



Survey Says...

↑ CEFLI Member Companies responding to CEFLI's 2025 Compliance & Ethics Benchmarking Survey last month noted the use of the following systems:

- Home grown system (12%)
- General tools (i.e., SharePoint, Excel, etc.) (38%)
- Admaster (4%)
- Red Oak (12%)
- RegEd Ad Trax (22%)
- Widen (2%)
- Other* (12%)

*Other Systems Noted:

- Ziflow
- Proof Point HQ
- Work Front
- First Consulting

Since the question asked respondents to check all responses that applied, the percentages will not add up to 100%.

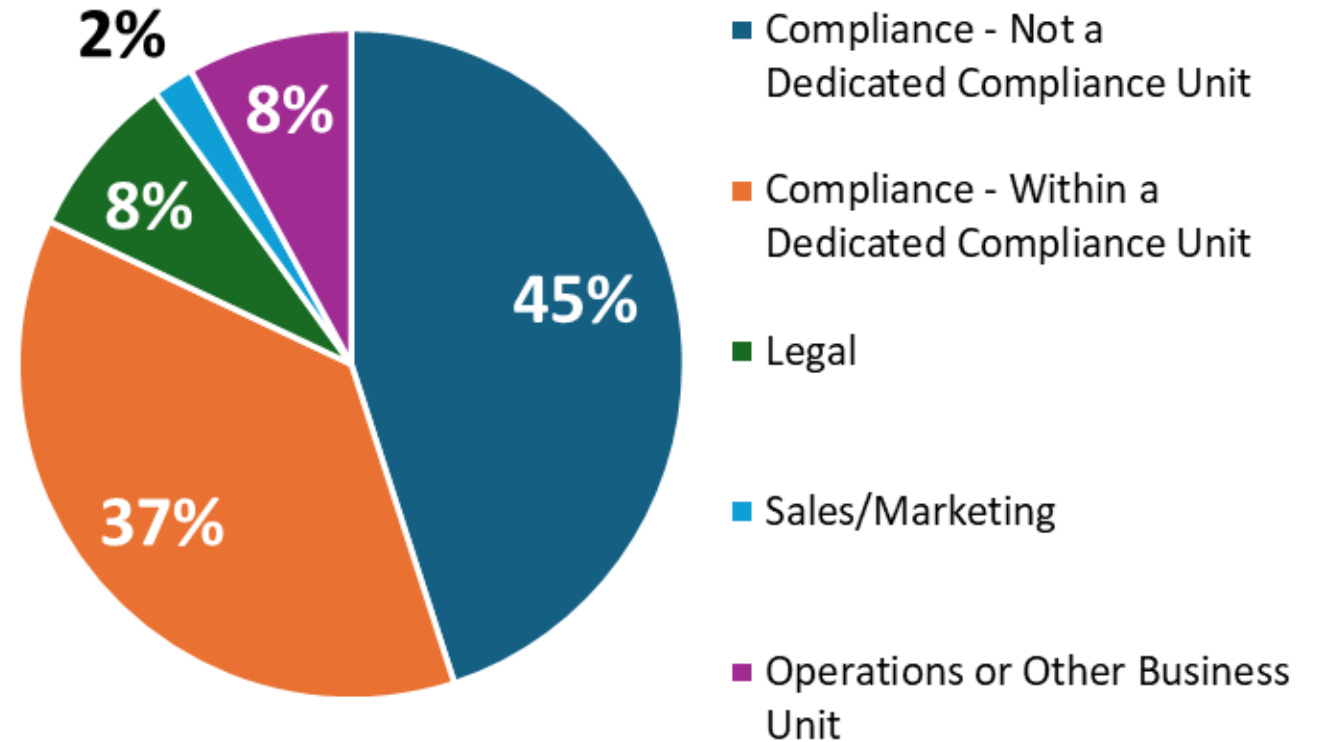
Survey Says...

- ↑ 18% of CEFLI Member Companies responding to CEFLI's 2025 Compliance & Ethics Benchmarking Survey noted they include information regarding their company's advertising and social media review metrics in the compliance reports shared with upline leadership.
- ↑ When asked about their top priorities for 2025, 12% of Member Companies responding to the survey noted Social Media and Advertising Reviews were a top priority or focus area. 6% anticipate it will also be a top priority in 2026.



Survey Says...

CEFLI Member Companies responding to CEFLI's 2025 Compliance & Ethics Benchmarking Survey noted they their company's Advertising Review function resides in the following areas





Technology – Social Media



Survey Says...

🌲 CEFLI Member Companies responding to CEFLI's 2025 Compliance & Ethics Benchmarking Survey last month noted the use of the following systems:

- Home grown system (12%)
- General tools (i.e., SharePoint, Excel, etc.) (37%)
- Hearsay (20%)
- Hootsuite (16%)
- Smarsh (16%)
- Sprinklr Social (6%)
- Other* (12%)

*Other Systems Noted:

- Sprout
- Mentionlytics
- Proofpoint

Since the question asked respondents to check all responses that applied, the percentages will not add up to 100%.

Current Challenges

Current Challenges: Ad Reviews

- ↑ Email Marketing/ Use of Blind Ads
- ↑ Limited Real Estate with Digital Marketing
- ↑ Search Engine Optimization (SEO)
- ↑ Working with Stakeholders – Relationship Management
- ↑ Managing State Approvals
- ↑ The Changing Regulatory Landscape

Current Challenges – Social Media

- 🌲 Limited Real Estate
- 🌲 Managing Content to Avoid Filing
- 🌲 New Platform Vetting & Management
- 🌲 Working with Influencers
- 🌲 Working with Direct-to-Consumer Groups

Use of AI

Use of AI with Compliance Activities



Key Compliance Controls

Compliance Controls

- ‡ Does the company have established policies and procedures regarding advertising, the use of Social Media and off-channel communications and are such policies communicated to those impacted, including company review processes?
- ‡ Does the company offer appropriate training and/or make training materials available to those who create or publish advertising?
- ‡ Are there consequences for noncompliance and are the consequences regularly communicated?
- ‡ Are materials filed timely (FINRA and states) when filing is required?

Compliance Controls

- ‡ Are there appropriate controls to monitor for compliance?
 - Use of print advertising, website content, social media, off-channel communications

- ‡ Does the company have appropriate record keeping protocols?
 - Advertising Review Records- Ads used, the manner and extent of distribution, compliance review documentation, supporting materials for testimonials, statistics used, etc.
 - Website Content Records - History and versions
 - Social Media Records – History and versions

Compliance Controls



Additional Resources

Additional Resources

Join our **Advertising Review Networking Forum!**

- The Forum meets quarterly for 60-90 minutes during the first month of each quarter
- Available to CEFLI Member Company staff
- Contact: NancyPerez@CEFLI.org



NAIC

- 🌲 [Model Regulation: Advertising - Life & Annuity](#)
- 🌲 [Model Regulation: Unfair Trade Practices](#)
- 🌲 [NAIC Market Regulation Handbook Chapter 23 – Conducting the Life and Annuity Examination \(refer to pages 8-13 for an advertising checklist\)](#)

STATES

- 🌲 [Advertising Checklist – West Virginia Office of the Insurance Commissioner](#)

FINRA

- 🌲 [FINRA Advertising Regulation](#)
- 🌲 [FINRA Frequently Asked Questions About Advertising Regulation](#)
- 🌲 [FINRA Advertising Regulation Notices](#)
- 🌲 [FINRA Advertising Regulation Guidance](#)

Questions

Please complete our short survey regarding the session. The QR code also appears on your agenda.



Networking Lunch: 12:00 – 1:00 PM

Geneva

