



Merchant Advertising Guidelines

SYNCHRONY'S INSTALLMENT LOAN

Welcome to financial solutions for every day.

Creating marketing that stands out and includes financing across multiple channels doesn't have to be complicated. Our Marketing and Advertising Guidelines illustrate requirements for promoting Synchrony's installment loan financing solutions. These guidelines are not all encompassing and are subject to change.

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Understand the Guidelines

How is advertising regulated?

These guidelines are not intended to serve as legal advice. Financial advertising is regulated by specific laws, including but not limited to Federal and State Unfair Deceptive Acts and Practices laws, Truth in Lending Act (TILA) and Fair Lending rules. Additionally, any email marketing must comply with Controlling the Assault of Non-Solicited Pornography and Marketing Act (CAN-SPAM). These rules and laws must be followed any time financing is referenced in marketing materials.

How to use Synchrony-approved content

How you advertise consumer financing products and the way that you present Synchrony's installment loan Program influences the customer's view of you and the Bank. Advertising incorrectly can result in complaints, customer dissatisfaction and regulatory violations.

- Marketing and advertising of consumer financing products is governed by state and Federal laws / regulations. This includes discussions of financing in your store or office location, by telephone or video conference, and conversations in the consumer's home.
- If you use marketing and advertising materials that refer to Synchrony Bank, the Synchrony Program or Synchrony installment loan products, you must follow the most current versions of the advertising guidelines provided by Synchrony, and use the Bank-approved advertising, templates and other disclosures or processes in the manner directed by Synchrony. In the alternative, upon notice by the Bank (which may be made by email), the Bank may require prior approval for certain or all advertising materials that refer to Synchrony Bank, the Synchrony Program or Synchrony installment loan products.
- If we communicate that any of your advertisements do not meet Synchrony's marketing and advertising guidelines, you will be required to immediately stop using these advertisements until changes have been made as soon as possible, but in no event later than 5 business days.

Checklist for your marketing



Review these Guidelines



Comply with all state and federal laws, rules and regulations on advertising



Marketing is accurate and clear



Ensure the advertisement reflects financing product offerings available at your service location



General Advertising of Synchrony Financing

Synchrony offers several types of financing solutions to give your customers the flexibility to choose a monthly payment option that suits their needs. **When it's more practical and fitting to advertise the general availability of financing and your participation with Synchrony rather than promoting a specific financing product, you can copy and use the pre-written messaging in this section.** You will still need to submit any materials that use this messaging to Synchrony for approval.

Advertisements referencing specific solutions such as **installment loans** and **interest promotion loans** offered by Synchrony require additional disclosures—please refer to the sections in these guidelines that cover additional disclosures.

How to introduce Synchrony to your customers

General advertising content you can display on your marketing materials that you'll need to use when introducing Synchrony to your customers.

What we do

Synchrony is on a mission to give you the most straightforward, simple and efficient financing in the industry. Once approved, their installment loan financing gives you an alternative way to pay for products and services over time, so you can easily get the things you want and need.

How it works

1. Pre-qualify quickly with no impact to your credit
2. View customized installment loan financing offers
3. Complete your application and get an instant credit check
4. Finalize your loan with no down payment
5. Manage your account and payments with Synchrony's seamless online experience
6. Experience dedicated support throughout the life of your account



General Advertising of Synchrony Financing

Do's & Don'ts when using financing-related terminology

Things to know when using financing-related terminology. The below chart makes it easy to identify messaging you can use when referring to financing through Synchrony, as well as phrases and messaging that must be avoided.

General messaging rules

- If you offer financing from multiple financing providers, you must distinguish the offers from each company and have the correct disclosures associated with the correct product.
- **DON'T** imply a false sense of urgency. Promotion end dates may not be used in advertising unless a promotion truly expires.
- **DON'T** mention FICO scores or approval rates in marketing.
- **DON'T** guarantee loans of certain amounts.

Examples of messaging rules

DO "SAY"	DON'T "SAY"
<ul style="list-style-type: none">• "Get the service you want with flexible financing options"• "Ask about our financing options"• "Competitive financing available"• "Buy now, make payments over time"• "Simple, quick pre-qualification with no credit impact"• "View instant customized financing offers"• "Finalize your loan with no down payment"• "Collaborating with", "working with", "teaming up with" [Synchrony]	<ul style="list-style-type: none">• "Approvals guaranteed"• "Instant approvals"• "Same as cash"• "partner" or "partnership" (when referring to your relationship with Synchrony)• "coupon" or "saving money" (when referring to Synchrony financing products or programs)

Any financial related disclosures required in your marketing must follow the rules provided below from the FTC.

The FTC requires the **4 Ps** to evaluate advertising disclosures:

- 1. Prominence:** is the statement prominent enough for the consumer to notice (i.e., is the disclosure large enough to notice and read)?
- 2. Presentation:** is the information presented in an easy-to-understand format that does not contradict other information?
- 3. Placement:** is the placement of the disclosure where a consumer could be expected to view?
- 4. Proximity:** is the information in close proximity to the claim it qualifies?




General Advertising of Synchrony Financing

Required Standard Disclosure

Any materials that mention Synchrony, our financing product or use the Synchrony logo require our standard disclosure be included.

Home Improvement Providers

“All loans are unsecured personal loans originated by Synchrony Bank, Equal Housing Lender . Subject to credit approval.”

Download EHL black icon [here](#). Download EHL white icon [here](#).

To download the Equal Housing Lending logo:

1. Right click on the image. Select Save Image As.
2. Enter a file name and choose where you'd like to save the file.
3. Then, select Save.

All Other Providers

“All loans are unsecured personal loans originated by Synchrony Bank. Subject to credit approval.”

DISCLOSURE REQUIREMENTS

Disclosure size	Required disclosures must be no smaller font than 1/5 the size of the body content statement being disclosed. Font size cannot be smaller than 8 pt. font.
Placement – Standard disclosure	The standard disclosure should be placed in general proximity to mention of Synchrony or use of our logo. Synchrony disclosures should be on the same page as the Synchrony logo or mention of Synchrony. The bottom of the webpage, ad or flyer where Synchrony is mentioned is typically sufficient.
Placement – Trigger term disclosure	A longer disclosure, often including a representative example, is required when your advertising uses a trigger term. A representative example must be placed immediately near the use of the trigger term and the remaining disclosure must be placed as close as the copy and design of the advertising realistically allows.
See page 9 for explanation on trigger terms	



General Advertising of Synchrony Financing

How to use the Synchrony Logo

The logo is the most visible asset in the Synchrony toolkit, and should be included on all official Synchrony materials. The logo encapsulates the Synchrony brand and allows for maximum brand recognition.

Color Logos

It's important that the Synchrony logo is legible on all items. For light backgrounds, use the logo with the charcoal gray Synchrony Wordmark. For dark backgrounds, use the logo with the white Synchrony Wordmark.



Black and White Logos

The all-black logo and the all-white logo are for instances when you're only using one color on an item.



Safe Distance

It's important to maintain clear space around the logo. If the logo starts to become too small, it may not reproduce well on an item. Always check with your vendor for best practices when producing the logo at a smaller size.



Minimum clearance is equal to the height of our symbol's shortest pillar.

PRINT 1-inch wide
DIGITAL 96 pixels

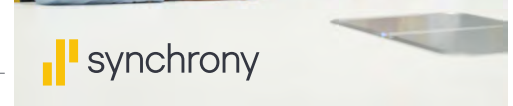


MINIMUM SIZE 1-inch wide

Use gold/white logo over solid colors or images where the background is darker.



Use gold/gray logo over white or light-colored backgrounds.



Logo Downloads

Download the color logos [here](#) and [here](#).

Download the black logo [here](#).

To download the Synchrony logo:

1. Right click on the image. Select Save Image As.
2. Enter a file name and choose where you'd like to save the file.
3. Then, select Save.



Advertising Specific Loan Solutions

TILA Disclosures & Payment Examples

Truth-in-Lending-Act (TILA) requires that customers receive disclosures about important terms of credit before they're obligated to pay back their loan. When advertising terms of credit, advertisements can only state terms that are *actually available*. Any mention of interest needs to be stated as the annual percentage rate (APR).

When you mention specific terms of credit, known as "trigger terms", in your marketing, TILA requires you to provide the full terms of repayment. A common way to achieve this is by using a representative example of what a real loan might look like in order to contextualize the trigger terms.

However, when certain specifics of a loan is being advertised, such as the monthly payment amount, please reference that particular detail within the example. For clarity, if the provider is advertising a product or service for \$60/month, then the example should not reflect "payments of \$97/month for 48 months for \$4,000 financed..." or any other example. It should refer to the \$60/month that's being advertised.

These messages DO TRIGGER a representative example.

TRIGGER TERMS	
The number of payments or period of repayment	<i>e.g., 12 months</i>
The monthly payment amount	<i>e.g., \$60/month</i>
The amount or percentage of any down payment	<i>If applicable</i>
<i>The amount of any finance charge</i>	<i>e.g., 0% interest promotion period</i>

A representative example reflects a typical loan through Synchrony offered to your customer. The representative example needs to include the following information:

**MONTHLY
PAYMENT AMOUNT**

**LENGTH OF
LOAN TERM**

**PURCHASE PRICE
(LOAN AMOUNT)**

**ANNUAL PERCENTAGE
RATE (APR)**

REPRESENTATIVE EXAMPLE DISCLOSURE

Example of monthly payment terms:
payments of **\$XX.XX/month** for XX months for **\$X,XXX financed** at **XX.XX% APR**.



Advertising Specific Loan Solutions

PAYMENT EXAMPLES BY FINANCING SOLUTION

The representative payment example should reflect **average** purchase price, APR, monthly payment and length of loan for your business.

Fixed Rate Installment Loan

Multiple examples provided to show different APRs, loan terms and loan amounts

Example of monthly payment terms: payments of \$47.57/month for 60 months for \$2,000 financed at 14.99% APR.

Example of monthly payment terms: payments of \$390.90/month for 72 months for \$20,000 financed at 11.99% APR.

Example of monthly payment terms: payments of \$185/month for 48 months for \$4,000 financed at 9.99% APR.

Interest Promotion Installment Loan

Example of monthly payment terms: payments of \$239.94/month for 48 months for \$7,000 financed at 26.99% APR. If the borrower pays off the loan during the promo period, we'll apply any interest paid during the promo period to the principal and we'll refund anything extra.



Fixed Rate Installment Loan (IL) Advertising Examples

Advertising the fixed rate installment loan:

Headlines promoting fixed rate installment loans that DO NOT trigger longer disclosures


The only disclosure required when using a headline shown below is a **standard disclosure** (see pg. 6)

- Flexible monthly payment options
- Fixed interest and no hidden fees
- A variety of fixed monthly payment solutions
- Competitive interest rates

Required disclosure for fixed rate installment loan advertising for all Healthcare providers.

All loans are unsecured personal loans originated by Synchrony Bank. Subject to credit approval. Annual Percentage Rate (APR) ranges up to 26.99%. APR is determined based on your credit score, loan amount, loan term, and credit usage and history at the time of application. Minimum purchase amounts apply.

Required disclosure for fixed rate installment loan advertising for all Home Improvement providers.

All loans are unsecured personal loans originated by Synchrony Bank, Equal Housing Lender . Subject to credit approval. Annual Percentage Rate (APR) ranges up to 15.99%. APR is determined based on your credit score, loan amount, loan term, and credit usage and history at the time of application. Minimum purchase amounts apply.

EXAMPLES OF FIXED RATE INSTALLMENT LOAN (IL) ADVERTISING ON PAGES 12-13.



Fixed Rate Installment Loan (IL) Advertising Examples

Common advertisement headlines promoting fixed rate installment loans that **do trigger representative examples and longer disclosures.**

EXAMPLE 1: Payments as low as \$XX a month

Payments as low as
\$50 a month

Your
Logo

(Your product/service photo and content here)

Example of monthly payment terms: payments of \$47.57/month for 60 months for \$2,000 financed at 14.99% APR. Payment depends on your purchase amount and loan term.

All loans are unsecured personal loans originated by Synchrony Bank. Subject to credit approval. Annual Percentage Rate (APR) ranges up to 26.99%. APR is determined based on your credit score, loan amount, loan term, and credit usage and history at the time of application. Minimum purchase amounts apply.

The low payment you are displaying is dependent on your product/services



Fixed Rate Installment Loan (IL) Advertising Examples

Common advertising headlines promoting fixed rate installment loans that **do trigger longer disclosures, including range of trigger terms.**

EXAMPLE 2: Rates as low as XX% APR

Finance your services today!

• Rates as low as 9.99% APR

Your Logo

(Your product/service photo and content here)

(Your product/service photo and content here)

All loans are unsecured personal loans originated by Synchrony Bank. Subject to credit approval. Annual Percentage Rate (APR) ranges up to 26.99%. APR is determined based on your credit score, loan amount, loan term, and credit usage and history at the time of application. Minimum purchase amounts apply.

If you want to advertise “rates as low as XX% APR”, the majority of your clients need to qualify for the advertised rate.



Interest Promotion Installment Loan Advertising Examples

Advertising the Interest Promotion installment loan:

Advertisement headlines promoting Interest Promotion installment loans that DO NOT trigger longer disclosures

The only disclosure required when using a headline shown below is a **standard disclosure** (see pg. 6)

- Flexible monthly payment options
- Fixed interest and no hidden fees
- A variety of fixed monthly payment solutions
- Special financing available


DON'T refer to Interest Promotion loans like this in advertising. These statements do not accurately reflect how the Interest Promotion product works.

- Same as cash
- No interest financing
- Deferred payments
- 0% interest financing

Required disclosure for Interest Promotion installment loan advertising for Healthcare providers.

All loans are unsecured personal loans originated by Synchrony Bank. Subject to credit approval. Interest Promotion products are installment loan products with an early payoff benefit. If the borrower pays off the loan during the promo period, we'll apply any interest paid during the promo period to the principal and we'll refund anything extra. To qualify for the early payoff benefit, a borrower needs to make payments on time and pay above their minimum monthly payment amount during the promo period. This isn't a requirement of the loan – but it is a requirement to take advantage of the promotion. Annual Percentage Rate (APR) ranges up to 26.99%. APR is determined based on the applicant's credit score, loan amount, loan term, and credit usage and history at the time of application. Minimum purchase amounts apply.

Required disclosure for Interest Promotion installment loan advertising for Home Improvement providers.

All loans are unsecured personal loans originated by Synchrony Bank, Equal Housing Lender . Subject to credit approval. Interest Promotion products are installment loan products with an early payoff benefit. If the borrower pays off the loan during the promo period, we'll apply any interest paid during the promo period to the principal and we'll refund anything extra. To qualify for the early payoff benefit, a borrower needs to make payments on time and pay above their minimum monthly payment amount during the promo period. This isn't a requirement of the loan – but it is a requirement to take advantage of the promotion. Annual Percentage Rate (APR) ranges up to 26.99%. APR is determined based on the applicant's credit score, loan amount, loan term, and credit usage and history at the time of application. Minimum purchase amounts apply.

EXAMPLES OF INTEREST PROMOTION INSTALLMENT LOAN ADVERTISING ON PAGE 15



Interest Promotion Installment Loan Advertising Examples

Common advertisement headlines promoting interest promotion product that **do trigger representative examples and longer disclosure.**

EXAMPLE 1:


- Waived interest promotion period up to XX months
- Finance today! Payments as low as \$XX/month

Waived interest promotion
period up to 18 months.

Your
Logo

(Your product/service photo and content here)

Example of monthly payment terms: payments of \$239.94/month for 48 months for \$7,000 financed at 26.99% APR. If the borrower pays off the loan during the promo period, we'll apply any interest paid during the promo period to the principal and we'll refund anything extra.

All loans are unsecured personal loans originated by Synchrony Bank, Equal Housing Lender . Subject to credit approval. Interest Promotion products are installment loan products with an early payoff benefit. If the borrower pays off the loan during the promo period, we'll apply any interest paid during the promo period to the principal and we'll refund anything extra. To qualify for the early payoff benefit, a borrower needs to make payments on time and pay above their minimum monthly payment amount during the promo period. This isn't a requirement of the loan – but it is a requirement to take advantage of the promotion. Annual Percentage Rate (APR) ranges up to 26.99%. APR is determined based on the applicant's credit score, loan amount, loan term, and credit usage and history at the time of application. Minimum purchase amounts apply.



Advertising By Channel



Print

When marketing financing in print advertising, you will want to ensure that all required disclosures and representative examples are placed in a clear and conspicuous manner. Please refer to the **disclosures** section and the **advertising examples** presented in these guidelines for additional guidance.



Website

We recommend developing a financing landing page within your business' website to ensure all relevant information and disclosures can be displayed correctly. When marketing financing on websites, you will want to ensure that all required disclosures and representative examples are placed in a clear and conspicuous manner. Please refer to the **disclosures** section and the **advertising examples** presented in these guidelines for additional guidance.



Broadcast TV/ Video & Radio

- Advertisements on TV and Radio have additional requirements not listed here. Please contact your account manager so we can work together to make sure your advertisement meets the requirements.
- **TV and radio advertisements will require additional lead time outside of the 5-10 business days needed for approvals.** Please reach out to us before you begin developing your TV/Radio advertising—we can advise you through the process.



Social

When considering advertising on social media, you'll need to avoid:

Advertising any financing offers on Facebook or Instagram using Sponsored Stories, paid Facebook/Instagram ads, or targeted to specific users.

WARNING:

Targeted financing ads could violate multiple laws

When considering advertising on social media, you'll need to:

- Use only general terms to discuss financing and avoid using trigger terms
- Use your home page only (your owned social media channel)
- Ensure disclosure font size is at least 1/5 the size of the main body text, and cannot be smaller than 8 pt. font
- Comply with each social media platform's Terms of Service
- Check for latest specification with each social media platform



Advertising by Channel



Email

Marketing emails must comply with Controlling the Assault of Non-Solicited Pornography and Marketing Act (CAN-SPAM) requirements and any other applicable federal and state laws, rules, regulations.

The FTC has provided the below guidance to comply with CAN-SPAM:

1. Don't use false or misleading header information.

Your "From," "To," "Reply to," and routing information—including the originating domain name and email address—must be accurate and identify the person or business who initiated the message.

2. Don't use deceptive subject lines.

The subject line must accurately reflect the contents of the message.

3. Identify the message as an ad.

You must disclose clearly and conspicuously that your message is an advertisement.

4. Tell recipients where you're located.

Your message must include your valid physical postal address. This can be your current street address, a post office box you've registered with the U.S. Postal Service or a private mailbox you've registered with a commercial mail receiving agency established under Postal Service regulations.

5. Tell recipients how to opt out of receiving future email from you.

Your message must include a clear and conspicuous explanation of how the recipient can opt out of getting email from you in the future.

6. Honor opt-out requests promptly.

Any opt-out mechanism you offer must be able to process opt-out requests for at least 30 days after you send your message. You must honor a recipient's opt-out request within 10 business days. You can't charge a fee, require the recipient to give you any personally identifying information beyond an email address, or make the recipient take any step other than sending a reply email or visiting a single page on an Internet website as a condition for honoring an opt-out request.

7. Monitor what others are doing on your behalf.

The law makes clear that even if you hire another company to handle your email marketing, you can't contract away your legal responsibility to comply with the law. Both the company whose product is promoted in the message and the company that actually sends the message may be held legally responsible.

Follow the below rules when using trigger terms in your email marketing:

- Emails with trigger terms must include the full terms of repayment or a representative example in the email itself.
- If the subject line has a trigger term, a representative example needs to be clear and conspicuous in the body of the email. The subject line must be accurate and not misleading.
- If the body of the email has a trigger term, a representative example needs to be clear and conspicuous and near the trigger term.

Please contact your account manager so we can work together to make sure your advertisement meets the requirements.



