Owned-Property Compliance Audit — Affiliate & Privacy

BRSG Compliance Standard · v1.0 · effective 2026-06-25 · standards.billricestrategy.com

Owned-Property Compliance Audit — Affiliate Disclosure & Privacy

Owner: Bill Rice (BRC LLC d/b/a Bill Rice Strategy Group) **Version:** v1.0 — 2026-06-25 **Audit date:** 2026-06-25 **Scope:** All BRSG-owned web properties. Two checks per property: (A1) affiliate / material-connection disclosure against the Affiliate & Sponsorship Disclosure Standard and FTC 16 CFR Part 255; (A3) privacy policy presence and CCPA/CPRA coverage. Method: live fetch of each homepage plus common legal paths (`/privacy`, `/privacy-policy`, `/disclosure`, `/affiliate-disclosure`, `/terms`). Article-level deep crawl was not performed; findings are at the site/template level.

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1. Headline finding

The affiliate-disclosure posture is, on balance, healthier than expected — most content hubs already carry a disclosure, and one property (agedleadsales.com) is an exemplary FTC pattern. **The material, systemic exposure is privacy.** Five of seven live properties collect personal information through active forms while serving no working privacy policy. That is the priority remediation, ahead of the affiliate-disclosure refinements.

Two properties carry a true point-zero affiliate gap: **howtoworkleads.com** (no disclosure at all while funneling to a commonly-owned vendor) and, secondarily, **proinvestorhub.com** (a single blanket line, no dedicated page, no footer coverage).

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2. A1 — Affiliate & material-connection disclosure

PROPERTY	AFFILIATE ACTIVITY	DISCLOSURE PRESENT	VERDICT
agedleadsales.com	Promotes lead providers + AgedLeadStore	Dedicated page + in-context labels + **founder-role disclosure**	**Strong / exemplary**
selfemployedlendinghub.com	Lender directory + product recs	Dedicated page (uses `rel="sponsored"`, RESPA § 8 carve-out)	**Adequate** — proximity gap
cryptolendinghub.com	Platform reviews/comparisons	Footer line + dedicated `/affiliate-disclosure` page	**Adequate** — proximity gap
proinvestorhub.com	Lender directory, ratings, comparison	One blanket line on `/lenders` only	**Needs work**
howtoworkleads.com	Funnels all CTAs to AgedLeadStore (commonly owned)	**None**	**Fail — P0**
billricestrategy.com	Sells own services; one "Outbounder" partner mention	**None**	**Minor** (low risk)
verifiedvector.com	Sells own services; showcases own sites	Self-ownership stated in copy	**Pass** (low risk)
demoleadgen.com	—	—	Unbuilt (no deployment)

Remediation (A1)

P0 — howtoworkleads.com. Every CTA routes to AgedLeadStore (a commonly-owned BRSG property) with tracking parameters, and there is no disclosure of the common-ownership / material connection anywhere on the site. Add a clear, conspicuous material-connection disclosure proximate to the CTAs (e.g., "AgedLeadStore is a Bill Rice Strategy Group company") plus a standing footer line and a dedicated disclosure page. This mirrors the founder-role disclosure already used well on agedleadsales.com.

P1 — proinvestorhub.com. Promote the single `/lenders` blanket line into: (a) a site-wide footer disclosure, (b) a dedicated affiliate-disclosure page, and (c) per-lender flagging of which listings are paid. The current "each affiliate relationship is always disclosed" claim is not borne out by per-link labeling.

P2 — proximity polish (crypto, self-employed). Both have solid dedicated pages but rely on footer/separate-page placement on comparison content. Add an article/listing-level disclosure banner at the top of any page carrying affiliate links or a lender table, per Affiliate Standard § 3.1 (proximate).

P3 — billricestrategy.com. The "Outbounder" partner mention should carry a one-line disclosure if any material connection exists. Low urgency given the services-based model.

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3. A3 — Privacy policy & CCPA/CPRA

PROPERTY	COLLECTS PII	PRIVACY POLICY	VERDICT
agedleadsales.com	Email (newsletter)	Live at `/privacy`; CCPA rights stated; "we do not sell"	**Pass** — minor polish
cryptolendinghub.com	Email + analytics	Live at `/privacy-policy`; names processors	**Needs work** — no CCPA rights section, no Do-Not-Sell/Share link
billricestrategy.com	Email + multiple lead flows	**None** (`/privacy` 404)	**Fail — P0**

PROPERTY	COLLECTS PII	PRIVACY POLICY	VERDICT
proinvestorhub.com	Email + lender lead routing	**None** (`/privacy` 404)	**Fail — P0**
selfemployedlendinghub.com	Email + gated lead magnet	**None** (`/privacy` 404)	**Fail — P0**
verifiedvector.com	Lead intake form (name/email/company)	**None**; no notice-at-collection on form	**Fail — P0**
howtoworkleads.com	Email + gated downloads	**Broken** — footer links to `/privacy-policy` and `/terms-of-service`, both 404	**Fail — P0**
demoleadgen.com	—	—	Unbuilt

Remediation (A3)

P0 — publish a privacy policy on every live property that collects PII. Affected now: billricestrategy.com, proinvestorhub.com, selfemployedlendinghub.com, verifiedvector.com (none exist) and howtoworkleads.com (links exist but 404). Each policy must carry the elements in the Privacy Policy & CCPA Standard: categories of personal information collected, categories of third parties it is shared with, a Do-Not-Sell/Share mechanism (or an explicit no-sale/no-share statement that addresses cross-context behavioral advertising), a privacy contact, and a CCPA/CPRA consumer-rights section. Link it site-wide in the footer.

- **proinvestorhub.com** carries added urgency: its "Find Your Lender" flow may transfer consumer data to lenders for value, which can constitute a "sale" or "share" under CPRA — making the missing Do-Not-Sell/Share mechanism a direct exposure, not a formality.
- **verifiedvector.com** also needs a notice-at-collection directly beneath the lead form's submit button (CPRA requires notice at or before the point of collection).
- **howtoworkleads.com** must also fix the dead Terms-of-Service link.

P1 — cryptolendinghub.com. Add a California/CCPA-CPRA consumer-rights section and a Do-Not-Sell/Share statement (its Google Analytics use can constitute "sharing" under CPRA even with no monetary sale). Add data-retention periods and a physical contact address.

P2 — agedleadsales.com. Verify the footer link points to `/privacy` (the `/privacy-policy` slug 404s and should not be referenced). Add the explicit cross-context-behavioral-advertising opt-out language to tighten CPRA alignment.

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4. Cross-cutting observations

- **Templated fix opportunity.** The BRSG content hubs share a Next.js + Sanity stack. A single privacy-policy page component and a footer disclosure component, deployed across the fleet, closes most of the privacy gap and the affiliate-footer gap in one pass rather than site-by-site.
- **TCPA exposure is currently low.** No audited form collects a phone number, which keeps TCPA/consent risk minimal. If any lead form adds a phone field, express-written-consent language at the submit becomes mandatory (see the planned TCPA/Lead Consent Standard).
- **demoleadgen.com** is an undeployed Vercel domain. No action until it is built; re-audit at launch.

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5. Action register (carry into the program tracker)

ID	ACTION	PRIORITY
A1-1	howtoworkleads.com — add material-connection / common-ownership disclosure + footer + dedicated page	P0
A1-2	proinvestorhub.com — site-wide footer disclosure, dedicated page, per-lender paid flagging	P1

ID	ACTION	PRIORITY
A1-3	crypto + self-employed — add proximate article/listing-level disclosure banner	P2
A1-4	billricestrategy.com — disclose Outbounder partner mention if material	P3
A3-1	Publish privacy policy on billricestrategy, proinvestorhub, selfemployedlendinghub, verifiedvector	P0
A3-2	howtoworkleads.com — publish real privacy policy + Terms (fix dead footer links)	P0
A3-3	proinvestorhub.com — Do-Not-Sell/Share mechanism for lender lead routing	P0
A3-4	verifiedvector.com — notice-at-collection beneath lead form submit	P1
A3-5	cryptolendinghub.com — add CCPA rights section + Do-Not-Sell/Share + retention	P1
A3-6	agedleadsales.com — footer link cleanup + CPRA sharing language	P2

Version History

VERSION	DATE	CHANGE
v1.0	2026-06-25	Initial audit of all owned properties — affiliate disclosure (A1) and privacy/CCPA (A3).