



Proprietary and Confidential Revised 9/20/2017 For questions contact your Synchrony Financial Representative

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## Introduction/Overview

Updated advertising guidelines: Effective September, 2017.

These Advertising Guidelines give you the information you need to help you advertise different types of promotional financing (equal payments/no interest, deferred interest, reduced APR/fixed payment). Each popular advertising channel is covered (print, broadcast, digital, POP, social media, etc.)

If you have additional questions, please contact your Synchrony Financial Representative.

If you advertise or market the financing available through your credit card program via any channel, several laws and regulations provide specific guidance about how to promote financing. It is important to comply with these laws and regulations.

## Federal and State Unfair, Deceptive and Abusive Acts and Practices Laws (UDAAP)

These require advertisements to fairly and accurately state the terms of the offer and not be false or misleading. Specific credit advertising requirements are addressed in the Truth in Lending Act (TILA)

## Truth In Lending Act ("TILA") and Implementing Regulation Z

These requirements apply to everyone, not just Synchrony Bank as the creditor. Therefore, all people and businesses must comply with Regulation Z if they advertise consumer credit transactions. The following site provides specific information about the Consumer Financial Protection Bureau (CFPB): http://www.consumerfinance.gov/

## **Fair Lending Requirements**

Credit must be *offered* to all applicants fairly and consistently. Failure to do so may result in allegations of discrimination, potential violations of federal or state fair lending laws, litigation or reputational risk. All applicants should be encouraged to apply for credit without fear of discrimination, which is prohibited by law. Types of discrimination includes race, color, religion, national origin, gender, marital status, age, source of income (in whole or in part) from public assistance programs, or an applicant's good faith exercise of a right under the Consumer Credit Protection Act.

Please review your advertising and marketing regularly. Use this document and your promo disclosures to ensure you remain compliant.



## Credit Defined

There are a variety of consumer financing products available. Synchrony Bank offers financing in two categories:

- 1. Revolving Credit Cards that can be used for multiple purchases
- Installment Loans that are one-time purchases and are not a credit card

Revolving credit cards may also be known as a credit card, consumer credit card, store card, or private label credit card.

Synchrony Bank provides the following promotional financing offers with its credit card product:

- 1. **Deferred Interest:** *Interest accrues* on the promotional purchase during the promotional period and will be assessed if the purchase is not paid in full within the promotional period. Typically, standard minimum monthly payments are required.
- 2. Equal Payments/No Interest: No interest is assessed on the promotional purchase and equal monthly payments are required until the promotion is paid in full.
- 3. Fixed Payments/Reduced APR: Interest is assessed on the promotional purchase at a reduced APR and equal payments are required until the promotion is paid in full.

The regulations referred to in these guidelines apply to all three types of credit card promotions. You'll find specific guidance for each type of promotion.

These Advertising Guidelines apply only to **Synchrony Bank's Revolving Credit Card Products (not Installment** Loans). Ask your **Synchrony Representative** for installment loan **Advertising Guidelines.** 

The promotional financing offers in these guidelines include:

- **Deferred Interest**
- **Equal Payments/No** Interest
- **Fixed** Payments/Reduced **APR**



## How Our Promotional Financing Offers Work for Consumers

Promotional Financing Offers	How are monthly payments calculated?	How long will it take to pay off the purchase?	What is the interest rate?	Will the interest rate change?	How do I pay the least amount of interest?	How do I avoid paying penalty fees?
Revolving Credit: A private label credi	t card with an assigned	I credit limit. It can be u	used to make purchase	es at any location that	accepts that specific c	redit card.
EQUAL PAYMENTS/NO INTEREST	The same <b>equal</b> payment amount required monthly.	Varies, based on the length of the promotion.	No Interest	No	N/A	Make all required payments by their due date. If you don't make a payment on time, you will be charged a late fee.
DEFERRED INTEREST	A minimum monthly payment is required, and varies based on your balance. Your statement tells you how much to pay.	If you <b>only</b> make the minimum payments, you <b>may not</b> pay off your purchase by the end of the promo period. See your billing statement for details.	your account, BUT you don't pay the	the standard rate for it is only assessed if promo purchase ne promo period.	Pay in full before the end of the promo period. If not, you will pay interest from the date of purchase.	Make all required payments by their due date. If you don't make a payment on time, you will be charged a late fee.
FIXED PAYMENTS/ REDUCED APR	The same <b>fixed</b> payment amount required monthly.	Varies, based on the length of the promotion.	Rate listed in advertising for the promo, and on your statement.	Not during the promo period.	You will pay interest. It's charged from the purchase date and is included in your monthly payment.	Make all required payments by their due date. If you don't make a payment on time, you will be charged a late fee.



## Definitions: Advertising Headlines

There are THREE types of advertising headlines typically
used to advertise Synchrony Bank financing offers:

Headline Examples: See your Advertising Disclosure template for specifically "how to" use subheads and disclosures.

1. Trigger Headline—Includes a "trigger" term such as No Interest or a specific APR

Trigger Term\*-A term that requires regulatory disclosures. Trigger term examples include:

- When or how interest will be applied
- APR or interest rate
- Other charges that may apply
- "No Annual Fee" statement
- · Any other finance charges like promotion/activation fees

- a. No Interest if Paid in Full Within 12 Months
- b. xx.xx% APR for 12 Months
- c. 0% Interest for 48 Months

2. Combo Headline-No trigger term, but a promotional period or time frame is included.

a. 12 Month Promotional Financing Available b. Ask about 48 Month Special Financing

3. Generic Headline-No trigger terms, promotional period or timeframes are included in the headline.

a. Promotional Financing Available b. Special Financing Available

NOTE: These are headlines only. Subhead and disclosures are also required.

\*If an advertisement includes a trigger term, the program's APR, promotional or activation fee, if applicable, and minimum interest charge must be disclosed

The less specific the financing headline, the fewer disclosure requirements apply.



# General Advertising Guidelines

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## Using Credit Card Name and/or Card Art: When and Why

When advertising trigger term or combo promotions, the subhead should include the name of the credit card that must be used to qualify for the promotion, since that is a material term of the specific offer.



An alternative to this requirement is to use an image of the credit card itself. This should be in close proximity to the headline so a reasonable consumer would understand that the credit card must be used.

### Example is illustration only.



## How to Disclose Qualifying or Minimum Purchases

When advertising trigger term or combo promotions, the subhead should include the minimum purchase amount and qualifying products (if applicable), since these are material terms of the specific offer.

For qualifying *products*, it would be worded:

On [insert product limitations] purchases [of \$XXX or more] made with your Retailer X credit card [date] - [date].

**XX Months** Promotional Financing Available\* On [product] purchases [of \$XXX or more] made with your XX credit card [date] - [date]. \*Subject to credit approval. Minimum monthly payments required. See store for details.

The qualifying or minimum purchase text can be removed from the subhead if:

Financing is available with no specific or minimum purchase, and all purchases on the credit card are given the financing offer.

#### Example is illustration only.





## Everyday Offer vs. Limited Time Financing Offer (Trigger or Combo)

For a limited time promotion, the following guidelines apply.

When advertising trigger term or combo promotions, the subhead should include the date range the offer is available, since that is a material term of the specific offer.

An exception applies if this is an everyday offer on the credit card (and never expires). The date range can be removed from the subhead.

See the trigger term example at right. The disclosure shown can be on the same page or if referenced (i.e. see back page for details) on a different page.

## No Interest for XX Months\* On [product] purchases [of \$XXX or more] made with your XX credit card. Equal monthly payments required for [XX] months. \*[Insert any product or purchase limitations or restrictions that are not in the headline.] [Qualifying purchase amount must be on one pt.] No interest will be charged and equal monthly payments are required on promo purchase until it is paid in full. These ments equal the total promo purchase amount divided by the number of months in the promo period and round whole dollar. These payments may be higher than the payments that would be required if this purchase was a new ular account terms apply to non-promo purchases. For new accounts: Purchase APR is [XX Existing cardholders: See your credit card agreement terms. Subject to credit approval. We res erms of this offer at any time

## NOTE:

When using an everyday offer, additional disclosure language should be used, if the retailer wants to reserve the right to change the offer in the future. (Generic ads do not require this language.)

See combo ad example at right.

"We reserve the right to discontinue or alter the terms of this offer at any time."

**XX Months** Promotional Financing Available\* On [product] purchases [of \$XXX or more] made with your XX credit card. \*Subject to credit approval. Minimum monthly payments required. See store for details. We reserve the right to discontinue or alter the terms of this offer at any time.



Example is illustration only.

## Advertising Financing with Multiple Financing Providers

When financing promotions from Synchrony Bank and other financial providers (including in-house financing) are mentioned in the same ad, it needs to be clear that all promotions are not offered on the credit card issued by Synchrony Bank. This should be done by identifying which lender is providing each offer.

Two potential ways to display this information:

- Option 1: Include program name (or financial provider) in the offer subhead (if each financial provider has a unique program name)
- Option 2: Add name of financing issuer/financial provider to disclosure or offer subhead

Please contact your Synchrony Financial representative. They will work with you on your unique situation and provide the correct language.



# Ad Guidelines by Channel

**Print Advertising** 

Point-of-Purchase

Internet/Web Page/Digital Advertising (With and Without Monthly Payments)

Television, Radio, Broadcast

Small/Large Format Advertising

Social Media (Facebook, Twitter, LinkedIn, Instagram, YouTube, Pinterest)

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## Print Ad—Deferred Interest

## **Type of Credit Card Promotion:**

#### **DEFERRED INTEREST ONLY**

### Main Headline (Trigger Type)

- Choice of font/size and color
- No variation in font/color throughout
- See Retail Advertising Disclosure Template for approved headline wording

#### Subhead

- Must be in close proximity to main headline
- Left, right or directly below headline
- Subhead must be a reasonable size in relation to headline. clear and conspicuous
- 40% of the main headline size could be a good benchmark
- Font size and color may vary, but no smaller than 10 pt.

### **Supporting Disclosure**

- Connects to headline via a disclosure identifier (i.e., asterisk)
- Must appear on same page (if single-page ad)
- Can appear elsewhere on multi-page ads with redirect from first reference. Example: See page XX for details.
- Different promotions or retail products should each have their own identifiers and start with a new paragraph if space allows.
- Minimum 8 pt. font size



\*[Insert any product or purchase limitations or restrictions that are not in the headline.] [Qualifying purchase amount must be on one receipt.] No interest will be charged on the promo purchase if you pay it off, in full, within the promo period. If you do not, interest will be charged on the promo purchase from the purchase date. The required minimum monthly payments may or may not pay off the promo purchase by the end of the promo period. Regular account terms apply to non-promo purchases and, after promo period ends, to the remaining promo balance. For new accounts: Purchase APR is [XX.99%]. Minimum interest charge is [\$X]. Existing cardholders: See your credit card agreement terms. Subject to credit approval.

Example is illustration only.



## Print Ad—Equal Payments/No Interest

## Type of Credit Card Promotion:

#### **EQUAL PAYMENTS/NO INTEREST**

### Main Headline (Trigger Type)

- Reasonable variation allowed in font/color/size
- Years may be used in headline (i.e., 3 years interest free financing)
- If a year (i.e. 2019) is used in a headline, a month must be used with it (i.e. 0% Interest Until January, 2019)
- See Retail Advertising Disclosure Template for headline wording

#### Subhead

- Must be in close proximity to main headline
- Font size may vary but can be no smaller than 10 pt.
- Subhead must be a reasonable size in relation to headline. clear and conspicuous
- 40% of the main headline size could be a good benchmark
- Months must be shown in the subhead when referring to the number of equal monthly payments required (even if years are shown in headline).

### **Supporting Disclosure**

- Connects to headline via a disclosure identifier (i.e., asterisk)
- Must appear on same page (if single-page ad)
- Can appear elsewhere on multi-page ads with redirect from first reference. Example: See page XX for details.
- Minimum 8 pt. font size
- Different promotions or retail products should have their own identifiers and start with a new paragraph if space allows
- Ads with multiple equal pay offers may link to the same disclosure.



will be charged and equal monthly payments are required on promo purchase until it is paid in full. These payments equal the total promo purchase amount divided by the number of months in the promo period and rounded up to the next whole dollar. These payments may be higher than the payments that would be required if this purchase was a non-promo purchase. Regular account terms apply to non-promo purchases. For new accounts: Purchase APR is [XX.XX%]. Minimum interest charge is [\$X]. Existing cardholders: See your credit card agreement terms. Subject to credit approval.

Example is illustration only.



## Print Ad—Fixed Payments/Reduced APR

## **Type of Credit Card Promotion:**

#### FIXED PAYMENTS/REDUCED APR

## Main Headline (Trigger Type)

- Reasonable variation allowed in font/color/size
- Years may be used in the headline (i.e. 3 years fixed monthly
- See Retail Advertising Disclosure Template for headline wording

#### Subhead

- Must be in close proximity to main headline
- Font size may vary but can be no smaller than 10 pt.
- Subhead must be a reasonable size in relation to headline, clear and conspicuous
- 40% of the main headline size could be a good benchmark
- Months should be shown in the subhead when referring to the number of equal monthly payments required (even if years are shown in headline).

### **Supporting Disclosure**

- Connects to headline via a disclosure identifier (i.e., asterisk)
- Must appear on same page (if single-page ad)
- Can appear elsewhere on multi-page ads with redirect from first reference. Example: See page XX for details.
- Minimum 8 pt. font size
- Different promotions or retail products should have their own identifiers and start with a new paragraph if space allows



Example is illustration only.

Ask your Synchrony Financial representative to provide specific promotion language based on the offer selected, or access Advertising Center at www.synchronybusiness.com

purchases. For new accounts: Purchase APR is [XX.XX%]. Minimum interest charge is [\$X]. Existing cardholders: See your credit card agreement

terms. Subject to credit approval.



## Print Ad—Combo

## **Type of Credit Card Promotion:**

### COMBO: NO TRIGGER TERM (INTEREST/APR) WITH PROMO TIMEFRAME

## Main Headline (Combo Type)

- Reasonable variation allowed in font/color/size
- Years may be used in headline (i.e., 3 Years Promotional Financing).
- See Retail Advertising Disclosure Template for headline wording

#### Subhead

- Must be in close proximity to main headline
- Subhead must be a reasonable size in relation to headline, clear and conspicuous
- 40% of the main headline size could be a good benchmark
- Font size may vary but can be no smaller than 10 pt.
- The minimum purchase required, card name or card art and specific time period offer is available should be in subhead.

## **Supporting Disclosure**

- Specific language:
  - \*Subject to credit approval. Minimum monthly payments required. See store for details.
- Connects to headline via a disclosure identifier (i.e., asterisk)
- Must appear on same page (if single-page ad)
- Can appear elsewhere on multi-page ads with redirect from first reference. Example: See page XX for details.
- Minimum 8 pt. font size
- Different promotions or retail products should have their own identifiers and start with a new paragraph if space allows



Example is illustration only.



## Print Ad—Generic

## **Type of Credit Card Promotion**

#### **GENERIC:**

**NO TRIGGER TERM (INTEREST/APR)** NO PROMO TIMEFRAME MENTIONED

## Main Headline (Generic Type)

- Reasonable variation allowed in font/color/size
- See Retail Advertising Disclosure Template for headline wording

#### Subhead

- No subhead is needed
- Optional: Include the fact that the promotional financing is available on a specific credit card

## **Supporting Disclosure**

- Specific language:
  - \*Subject to credit approval. Minimum monthly payments required. See store for details.
- Connects to headline via a disclosure identifier (i.e., asterisk)
- Must appear on same page (if single-page ad)
- Can appear elsewhere on multi-page ads with redirect from first reference. Example: See page XX for details.
- Minimum 8 pt. font size
- Supporting disclosure can be located with other disclosures
- Different promotions or retail products should have their own identifiers and start with a new paragraph if space allows
- The generic disclosure and the disclosure symbol (\*) are suggested, but only required when the credit card name or image is mentioned or shown
- If there is no mention of the credit card or an image of the credit card, then no disclosure is required when using the generic headline
- Card image is optional



### Example is illustration only.



## Print Ad—Multi-page Advertising and Redirects

## **Type of Credit Card Promotion**

## TRIGGER TERM: (DEFERRED INTEREST, EQUAL PAYMENTS/NO INTEREST, FIXED PAYMENTS/REDUCED APR)

## **Redirect Supporting Disclosure**

- · Redirect from first promotional headline and subhead
- Connects to headline via a disclosure identifier (i.e., asterisk) and provides direction to where the disclosure is located (i.e. See page 10 for details.)
- Minimum 8 pt. font size
- Make sure each page is numbered, so consumer can find the disclosure easily. Another choice is to use a description (see back page, see front cover, etc.)

### Option

 Ads with multiple offers of the same type may link to the same disclosure.



**Back** 



[Insert any product or purchase limitations or restrictions that are not in the headline.] [Qualifying purchase amount must be on one receipt.] No interest will be charged and equal monthly payments are required on promo purchase until it is paid in full. These payments equal the total promo purchase amount divided by the number of months in the promo period and rounded up to the next whole dollar. These payments may be higher than the payments that would be required if this purchase was a non-promo purchase. Regular account terms apply to non-promo purchases. For new accounts: Purchase APR is [XX.XX%]. Minimum interest charge is [\$X]. Existing cardholders: See your credit card agreement terms. Subject to credit approval.



## Point-of-Purchase—Deferred Interest

## **Type of Credit Card Promotion:**

#### DEFERRED INTEREST ONLY

## Main Headline (Trigger Type)

- Choice of font/size and color
- No variation in font/color throughout
- See Retail Advertising Disclosure Template for approved headline wording

#### Subhead

- Must be in close proximity to main headline
- Left, right or directly below headline
- Subhead must be a reasonable size in relation to headline. clear and conspicuous
- 40% of the main headline size could be a good benchmark
- Font size and color may vary, but can be no smaller than 10 pt.

## **Supporting Disclosure**

- Connects to headline via a disclosure identifier (i.e., asterisk)
- Must appear on same page (if single-page ad)
- Can appear elsewhere on multi-page ads with redirect from first reference. Example: See page XX for details.
- Minimum 8 pt. font size
- Different promotions or retail products should each have their own identifiers and start with a new paragraph if space allows



## No interest if paid in full within XX months\*

On [product] purchases [of \$XXX or more] made with your XX credit card [date] - [date]. Interest will be charged to your account from the purchase date if the promotional purchase is not paid in full within [XX] months. Minimum monthly payments required.

\*[Insert any product or purchase limitations or restrictions that are not in the headline.] [Qualifying purchase amount must be on one receipt.] No interest will be charged on the promo purchase if you pay it off, in full, within the promo period. If you do not, interest will be charged on the promo purchase from the purchase date. The required minimum monthly payments may or may not pay off the promo purchase by the end of the promo period. Regular account terms apply to non-promo purchases and, after promo period ends, to the remaining promo balance. For new accounts: Purchase APR is [XX.99%]. Minimum interest charge is [\$X]. Existing cardholders: See your credit card agreement terms. Subject to credit approval.



Example is illustration only.



## Point-of-Purchase—Equal Payments/No Interest

## **Type of Credit Card Promotion:**

#### **EQUAL PAYMENTS/NO INTEREST**

## Main Headline (Trigger Type)

- Reasonable variation allowed in font/color/size
- Years may be used in headline (i.e., 3 years interest free financing).
- If a year (i.e. 2019) is used in a headline, a month must be used with it (i.e. 0% Interest Until January, 2019)
- See Retail Advertising Disclosure Template for headline wording

#### Subhead

- Must be in close proximity to main headline
- Font size may vary but can be no smaller than 10 pt.
- Subhead must be a reasonable size in relation to headline. clear and conspicuous
- 40% of the main headline size could be a good benchmark
- Months must be shown in the subhead when referring to the number of equal monthly payments required (even if years are shown in headline).

### **Supporting Disclosure**

- Connects to headline via a disclosure identifier (i.e., asterisk)
- Must appear on same page (if single-page POP)
- Can appear elsewhere on multi-page ads with redirect from first reference. Example: See page XX for details.
- Minimum 8 pt. font size
- Different promotions or retail products should have their own identifiers and start with a new paragraph if space allows
- Ads with multiple equal pay offers may link to the same disclosure.



Example is illustration only.

Ask your Synchrony Financial representative to provide specific promotion language based on the offer selected, or access Advertising Center at www.synchronybusiness.com

Subject to credit approval.



## Point-of-Purchase—Fixed Payments/Reduced APR

## **Type of Credit Card Promotion:**

#### FIXED PAYMENTS/REDUCED APR

### Main Headline (Trigger Type)

- Reasonable variation allowed in font/color/size
- Years may be used in the headline (i.e. 3 years fixed monthly payments)
- See Retail Advertising Disclosure Template for headline wording

#### Subhead

- Must be in close proximity to main headline
- Font size may vary but can be no smaller than 10 pt.
- Subhead must be a reasonable size in relation to headline, clear and conspicuous
- 40% of the main headline size could be a good benchmark
- Months must be shown in the subhead when referring to the number of equal monthly payments required (even if years are shown in headline).

### **Supporting Disclosure**

- Connects to headline via a disclosure identifier (i.e., asterisk)
- Must appear on same page (if single-page ad)
- Can appear elsewhere on multi-page ads with redirect from first reference. Example: See page XX for details.
- Minimum 8 pt. font size
- Different promotions or retail products should have their own identifiers and start with a new paragraph if space allows



X.XX%

**APR** until paid in full\*

On [product] purchases [of \$XXX or more] made with your XX credit card [date] - [date]. Fixed monthly payments required for [XX] months.

\*[Insert any product or purchase limitations or restrictions that are not in the headline.] [Qualifying purchase amount must be on one receipt.] Interest will be charged on the promo purchase from the purchase date at a reduced [XX.XX%] APR, and fixed monthly payments are required until paid in full. These payments are equal to X.XX% of initial promo purchase amount and rounded up to the next whole dollar. These payments may be higher than the payments that would be required if this purchase was a non-promo purchase. Regular account terms apply to non-promo purchases. For new accounts: Purchase APR is [XX.XX%]. Minimum interest charge is [\$X]. Existing cardholders: See your credit card agreement terms. Subject to credit approval.



Example is illustration only.



## Point-of-Purchase—Combo

## Type of Credit Card Promotion:

#### COMBO:

**NO TRIGGER TERM (INTEREST/APR)** WITH PROMO TIMEFRAME ONLY

### Main Headline (Combo Type)

- Reasonable variation allowed in font/color/size
- Years may be used in headline (i.e., 3 years Promotional Financing Available)
- See Retail Advertising Disclosure Template for headline wording

#### Subhead

- Must be in close proximity to main headline
- Subhead must be a reasonable size in relation to headline. clear and conspicuous
- 40% of the main headline size could be a good benchmark
- Font size may vary but can be no smaller than 10 pt.
- The minimum purchase required, card name or art image and specific time period offer is available should be in subhead.

## **Supporting Disclosure**

- Specific language:
  - \*Subject to credit approval. Minimum monthly payments required. See store for details.
- Connects to headline via a disclosure identifier (i.e., asterisk)
- Must appear on same page (if single-page ad)
- Can appear elsewhere on multi-page ads with redirect from first reference. Example: See page XX for details.
- Minimum 8 pt. font size
- Different promotions or retail products should have their own identifiers and start with a new paragraph if space allows



Example is illustration only.



## Point-of-Purchase—Generic

## **Type of Credit Card Promotion:**

#### **GENERIC:**

**NO TRIGGER TERM (INTEREST/APR) NO PROMO TIMEFRAME MENTIONED** 

### Main Headline (Generic Type)

Reasonable variation allowed in font/color/size

#### Subhead

- No subhead is needed
- Optional: Include the fact that the promotional financing is available on a specific credit card

## **Supporting Disclosure**

- Specific language:
  - \*Subject to credit approval. Minimum monthly payments required. See store for details.
- · Connects to headline via a disclosure identifier (i.e., asterisk)
- Must appear on same page (if single-page ad/POP)
- Can appear elsewhere on multi-page ads with redirect from first reference. Example: See page XX for details.
- Minimum 8 pt. font size
- The Generic disclosure and the disclosure symbol (\*) are suggested, but only required when the credit card name or image is referenced or shown
- Different promotions or retail products should have their own identifiers and start with a new paragraph if space allows
- Card image is optional.



Example is illustration only.



## Internet Advertising—Trigger Term/Deferred Interest

## Type of Credit Card Promotion:

#### **DEFERRED INTEREST ONLY**

## Main Headline (Trigger Type)

- Choice of font/size and color
- No variation in font/color throughout
- See Retail Advertising Disclosure Template for approved headline wording

#### Subhead

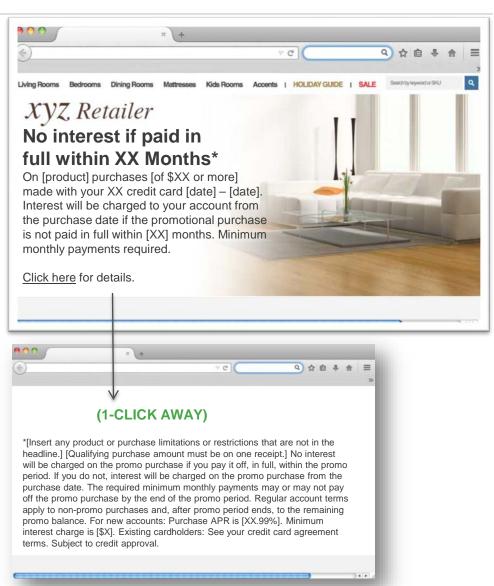
- Must be connected to main headline
- Left, right or directly below headline
- Subhead must be a reasonable size in relation to headline, clear and conspicuous
- 40% of the main headline size could be a good benchmark
- Font size and color may vary, but no smaller than 10 pt.
- If supporting disclosure is NOT shown on same page with headline/subhead, then subhead must include directions to click here for full details/disclosures.

### **Supporting Disclosure**

Minimum 8 pt. font for disclosure

### Example is illustration only.





## Internet Advertising—Trigger Term/Equal Payments/No Interest

## Type of Credit Card Promotion:

#### **EQUAL PAYMENTS/NO INTEREST ONLY**

## Main Headline (Trigger Type)

- Choice of size and color as desired
- Reasonable variation in font/color throughout
- See Retail Advertising Disclosure Template for headline wording

#### Subhead

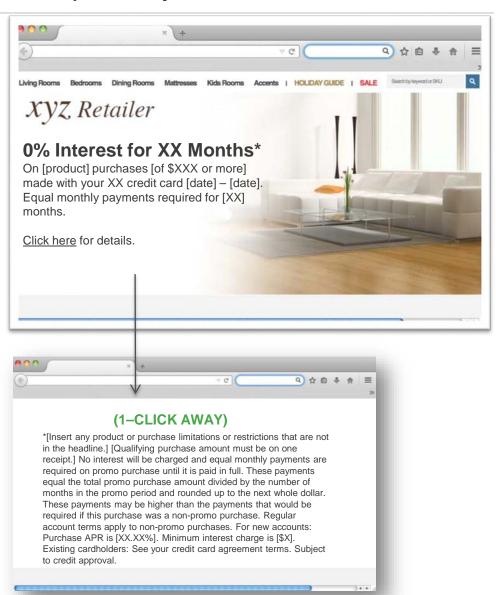
- Must be connected to main headline
- Left, right or directly below headline
- Subhead must be a reasonable size in relation to headline, clear and conspicuous
- 40% of the main headline size could be a good benchmark
- No variation in font/color throughout
- Minimum 10 pt. font size
- If supporting disclosure is NOT shown on same page with headline/subhead, then subhead must include directions to click here for full details/disclosures.

### **Supporting Disclosure**

Minimum 8 pt. font for disclosure

#### Example is illustration only.





## Internet Advertising—Combo

## **Type of Credit Card Promotion:**

#### COMBO:

**NO TRIGGER TERM (INTEREST/APR) WITH PROMO TIMEFRAME** 

#### Main Headline (Combo Type)

- Reasonable variation allowed in font/color/size
- See Retail Advertising Disclosure Template for headline wording

#### Subhead

- Must be in close proximity to main headline
- Subhead must be a reasonable size in relation to headline, clear and conspicuous
- 40% of the main headline size could be a good benchmark
- Font size may vary but can be no smaller than 10 pt.
- The minimum purchase required, card name or art image and specific time period offer is available should be in subhead.

## **Supporting Disclosure**

· Minimum 8 pt. font size

## If purchase CANNOT be made online:

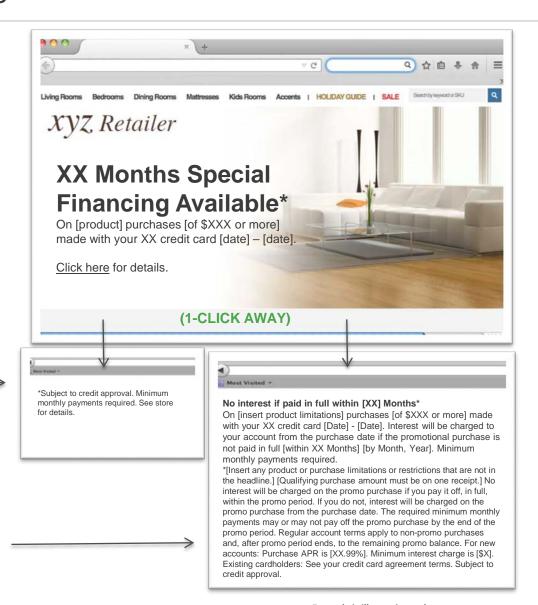
- Either include supporting disclosure on same page or have the following disclosure one click away \*Subject to credit approval. Minimum monthly payments required.
  - See store for details.

## If purchase CAN be made online:

• The full headline/subhead and disclosure applicable to promotional ad type must be no more than one click away. (This is a deferred interest example.)

NOTE: Store/site must have full details available





Example is illustration only.

## Internet—Generic Ad

## **Type of Credit Card Promotion:**

### **GENERIC:**

**NO TRIGGER TERM (INTEREST/APR) NO PROMO TIMEFRAME MENTIONED** 

### Main Headline (Generic Type)

Reasonable variation allowed in font/color/size

#### Subhead

- No subhead is needed
- Optional: Include the fact that the promotional financing is available on a specific credit card

## **Supporting Disclosure**

• Minimum 8 pt. font size

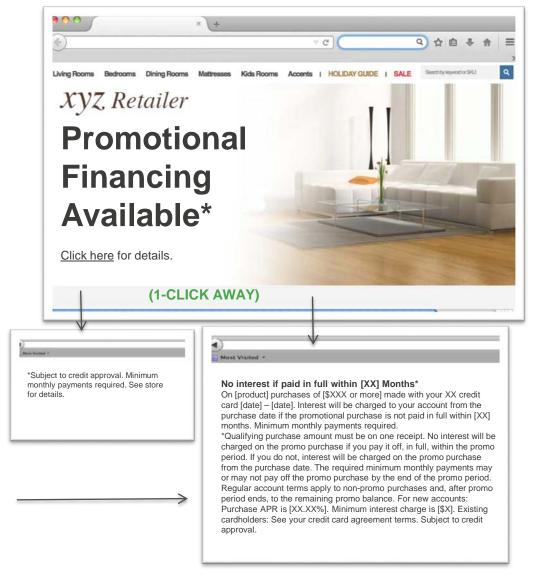
#### If purchase CANNOT be made online:

- Either include supporting disclosure on same page or have the following disclosure one click away:
  - \*Subject to credit approval. Minimum monthly payments required. See store for details.
- If there is no mention of the credit card or no image of the credit card, then no disclosure is required when using this generic headline.

### If purchase CAN be made online:

The full headline/subhead and disclosure applicable to promotional ad type must be no more than one click away. (This is a deferred interest example.)

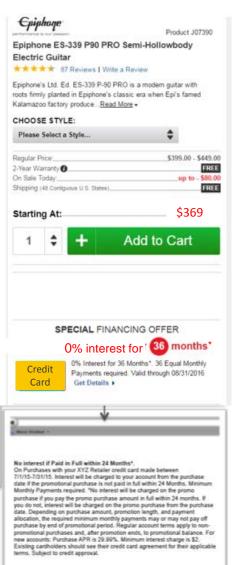
NOTE: Store/site must have full details available





## Internet—Product Detail Page (No Monthly Payments)







(One click away)

## Type of Credit Card Promotion:

### EQUAL PAYMENTS/NO INTEREST OR FIXED PAYMENTS/REDUCED APR TRIGGER TERM **PROMOTIONS**

### Main Headline (Trigger Type)

- May be trigger term, combo or generic
- Reasonable variation in font size and color (equal payments/no interest and fixed payments/reduced
- Years may be used in headline if months are in subhead (equal payments or fixed payments)
- If a year is used (i.e. 2019) then a month must also be used (i.e. 0% Interest until January, 2019)

#### Subhead

- Must be in close proximity to the headline
- Subhead must be a reasonable size in relation to headline, clear and conspicuous
- 40% of the main headline size could be a good benchmark
- Months must be shown in the subhead when referring to the number of equal/fixed monthly payments (even if years are shown in the headline)

### **Supporting Disclosure**

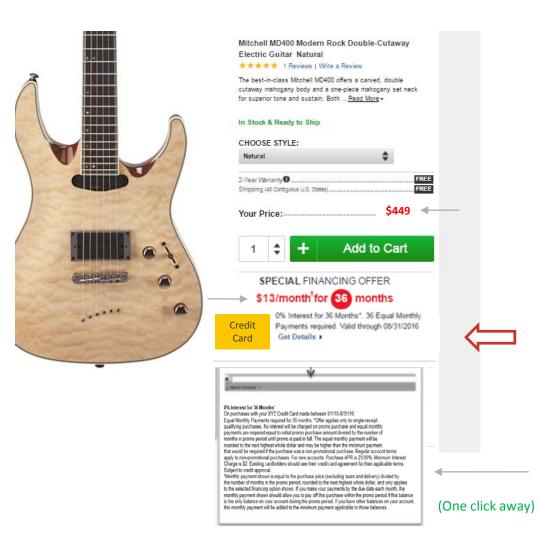
Full disclosure of offer must be one click away.

NOTE: This is an equal payments/no interest example

Example is illustration only.



## Internet—Product Detail Page/Monthly Payments (Equal Payments/No Interest)



## **Type of Credit Card Promotion:**

#### **EQUAL PAYMENTS/NO INTEREST ONLY**

#### Main Headline

- Total payments, number of months and monthly payment must be the same size (equal prominence) For equal payments/no interest, total payments equals total price.
- All three elements (total payments, number of months and monthly payment) should be in close proximity
- If a year is used (i.e. 2019) then a month must also be used (i.e. 0% Interest until January, 2019)
- This format is only available for equal payments/no interest offers

#### Subhead

- Must be in close proximity to the headline
- Subhead must be a reasonable size in relation to headline, clear and conspicuous
- 40% of the main headline size could be a good benchmark
- Months must be shown in the subhead when referring to the number of equal/fixed monthly payments (even if years are shown in the headline)

## **Supporting Disclosure**

Disclosures of offer and monthly payments must be one click away.



## Internet—Product Detail Page/Monthly Payments (Deferred Interest)





#### No Interest if Paid in Full Within 12 Months\*

On purchases with your XYZ Credit Card made between [date] – [date]. Interest will be charged to your account from the purchase date if the promotional purchase is not paid in full within 12 months. Minimum monthly payments required.

#### Click for details

The Optional Equal Monthly Payments shown below may be greater than the required minimum monthly payment that will be on your billing statement when you use the 12 month promotional financing offer.

#### These payments:

- Equal the promotional purchase amount divided by 12 (excluding taxes and shipping charges).
- Would pay off the promotional purchase amount within 12 months, but only if there are no other balances on your account at any time during the 12 month promotional period and you make your payments on time. Your total payments will equal the amount of the promotional purchase amount.

If the promotional purchase amount is not paid in full within 12 months, interest will be charged to your account from the purchase date and your total payments will be greater than the amount of the promotional purchase amount.

	Promotional Purchase Amount	Optional Equal Monthly Payment	Promotional Period
ı	\$449	\$38	12

## **Type of Credit Card Promotion:**

#### DEFERRED INTEREST

#### Main Headline (Trigger Type) – For Pop-Up Box

- Choice of font/size and color
- No variation in font/color throughout
- See Retail Advertising Disclosure Template for approved headline wording

### Subhead - For Pop-Up Box

- Must be connected to main headline
- Left, right or directly below headline
- Subhead must be a reasonable size in relation to headline, clear and conspicuous
- 40% of the main headline size could be a good benchmark
- No variation in font/color throughout

### **Supporting Disclosure**

N/A

NOTE: The pop-up box (left) with the deferred interest information and optional monthly payment information is REQUIRED when advertising deferred interest monthly payments. Click for details goes to the finance page.



#### Example is illustration only.



## Internet/Digital—Banner Ads (Equal Payments, Deferred, Combo)



For 24 Months\* on purchases of \$399 or more with 24 equal monthly

August 1 - August 15, 2017

payments required.

Exclusions and limitations apply. Get details.

**EQUAL PAYMENTS/NO** INTEREST: One click to finance page



## No interest if paid in full within 24 months\*

On purchases of \$399 or more 8/1/17-8/15/17.

Exclusions and limitations apply. Get details.

**DEFERRED INTEREST: One click** to finance page with application



Note: If credit card is not shown, then card name must be included in the subhead.

COMBO: One click to finance page

**Get Details** 

## **Type of Credit Card Promotion:**

- **EQUAL PAYMENTS/NO INTEREST**
- FIXED PAYMENTS/REDUCED APR
- **DEFERRED INTEREST**

#### Main Headline

- Equal Payments/No Interest, Deferred Interest or Fixed Payments/Reduced APR full headline
- See Retail Advertising Disclosure Template for wording

#### Subhead

- Must be in close proximity to the headline
- Subhead must be a reasonable size in relation to headline, clear and conspicuous
- 40% of the main headline size could be a good benchmark
- Full subhead for trigger and combo promotions.

## **Supporting Disclosure**

Disclosures must be on the same page or one click away.



0% Interest for 24 Months\* on purchases of \$399 or more with 24 equal monthly payments required 8/1/17-8/15/17. Exclusions and limitations apply

EQUAL PAYMENTS/NO INTEREST: Pencil Banner: One click to finance page

## 0% Interest For 24 Months\*

on purchases of \$399 or more with 24 equal monthly payments required.

8/1/17-8/15/17

Exclusions and limitations apply.



## **EQUAL PAYMENTS/NO INTEREST:**

Home Page Carousel

One click to finance page.



## Television or Radio/Broadcast

#### Visuals (TV)

 Disclosures cannot be obscured by graphics, shading, coloration or other ways. Disclosures must be displayed so a consumer can reasonably see and read the information.

#### Audio

- Whether via radio, television or other broadcast, the required disclosures must be given at a speed and volume sufficient for a consumer to hear and understand them.
- Speed and volume should be similar to the rest of the commercial content.

#### **Additional Guidance**

- · Properly disclosing financing promotions in TV and radio advertisements is challenging due to the time limitations associated with these media. The announcement of the promotion must not create a misleading impression and essential information about the promotion must be disclosed.
- For TV ads, a combination of audio and visual disclosures should be allowed, as long as the consumer is aware of the required information.
- Abbreviations, such as those shown in the example on the following pages, may be used, provided all the required disclosures are made in a clear and conspicuous manner, and are available to a consumer prior to the purchase.
- A TV ad for a financing promotion will typically include the following information via audio: The standard headline, the name of the credit card that needs to be used, the time period of the promotion (if limited) and the qualifying product(s). Sometimes portions of that information are also shown on screen. The disclosures are typically presented visually.

TV/Radio Ads and scripts should be shown to your Synchrony Financial representative to gather feedback from Synchrony Financial's advertising review resources.





#### Example is illustration only.



## Radio Promo Examples: Trigger Term

Due to the limited amount of time within a radio ad, it may not be possible to fully disclose the typical subhead and disclosure for trigger term promotional advertising. For this type of ad only, the following adjustments have been made to the language:

### **Trigger Promotional Language – Radio:**

## Example of Equal Payments/No Interest WITH MONTHLY PAYMENTS Promotional Radio Ad

#### AUDIO:

...and now through [date] get Interest Free Financing for [XX] Months on purchases of [Insert dollar or product limitation] with your [program name] credit card. [XX] equal monthly payments required.

#### DISCLOSURE

Monthly payments equal the promo purchase divided by number of months in promo period rounded to next highest whole dollar. For new accounts: Purchase APR is [XX.XX%]. Minimum interest charge is [\$X]. Subject to credit approval. See [insert where] for details.

### Example of Fixed Payments/Reduced APR WITH MONTHLY PAYMENTS Promotional or Radio Ad AUDIO:

...and now through [date], get [XX] Months fixed monthly payments at [X.XX]% APR on purchases of [Insert dollar or product limitation] with your [program name] credit card.

#### DISCLOSURE

Monthly payments equal X.XXX% of promo purchase rounded to next highest whole dollar. For new accounts: Purchase APR is [XX.XX%]. Minimum interest charge is [\$X]. Subject to credit approval. See [insert where] for details.

## Example of Deferred Interest Promotional or Radio Ad

#### **AUDIO**

...and now through [date], get No Interest if paid in full within [XX] Months on purchases of [Insert dollar or product limitation] with your [program name] credit card.

Minimum monthly payments required.

#### DISCLOSURE

Interest will be charged to your account from the purchase date if the promotional purchase is not paid in full within [XX] months. For new accounts: Purchase APR is [XX.XX%]. Minimum interest charge is [\$X]. Subject to credit approval. See [insert where] for details.

We encourage you to share the radio script and/or TV storyboards with your Synchrony Financial representative as early in the creative process as possible to gain feedback, so any required changes can be made.



## Radio Promo Examples: Combo

## Combo Promotional Language – Radio:

## Example of Combo Equal Payments/No Interest WITH MONTHLY PAYMENTS Promotional Radio Ad AUDIO:

...and now through [date] get Special Financing for [XX] Months on purchases of [Insert dollar or product limitation] with your [program name] credit card.

#### DISCLOSURE

Subject to credit approval. Minimum monthly payments required. See store for details.

## Example of Fixed Payments/Reduced APR WITH MONTHLY PAYMENTS Promotional Radio Ad

AUDIO:

...and now through [date], get Special Financing on purchases of [Insert dollar or product limitation] with your [program name] credit card.

#### DISCLOSURE

Subject to credit approval. Minimum monthly payments required. See store for details.

### **Example of Deferred Interest Combo Promotional Radio Ad**

**AUDIO** 

...and now through [date], get Special Financing for [XX] Months on purchases of [Insert dollar or product limitation] with your [program name] credit card.

Minimum monthly payments required.

#### DISCLOSURE

Subject to credit approval. Minimum monthly payments required. See store for details.

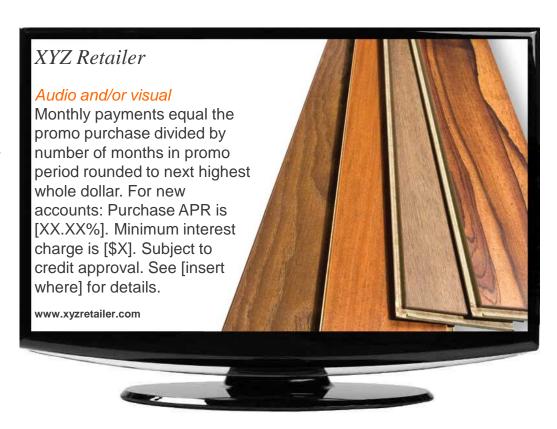
We encourage you to share the radio script and/or TV storyboards with your Synchrony Financial representative as early in the creative process as possible to gain feedback, so any required changes can be made.



## TV: Equal Payments/No Interest

## AUDIO and/or VISUAL:

...and now through [date] get interest free financing for [XX] months on purchases of [Insert dollar or product limitation] with your [program name] credit card. [XX] equal monthly payments required.



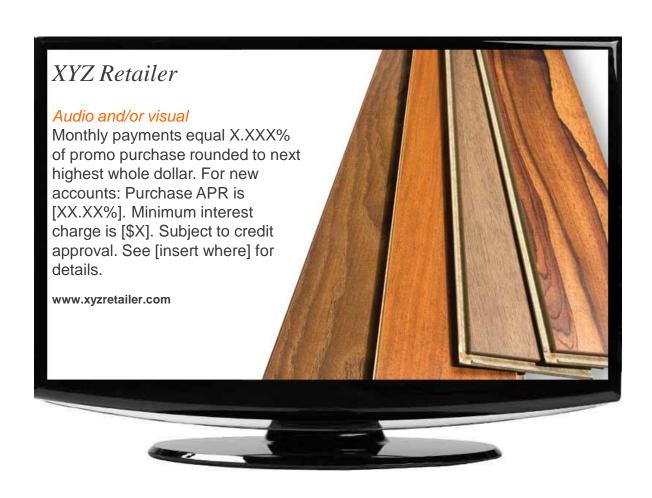
#### Example is illustration only.



## TV: Fixed Payments/Reduced APR

## AUDIO and/or VISUAL:

...and now through [date], get [XX] months fixed monthly payments at [X.XX%] APR on purchases of [Insert dollar or product limitation] with your [program name] credit card.



#### Example is illustration only.



### TV: Deferred Interest

### AUDIO and/or VISUAL:

...and now through [date], get no interest if paid in full within [XX] months on purchases of [Insert dollar or product limitation] with your [program name] credit card. Minimum monthly payments required.



#### Example is illustration only.



# TV: Equal Payments/No Interest With Monthly Payments

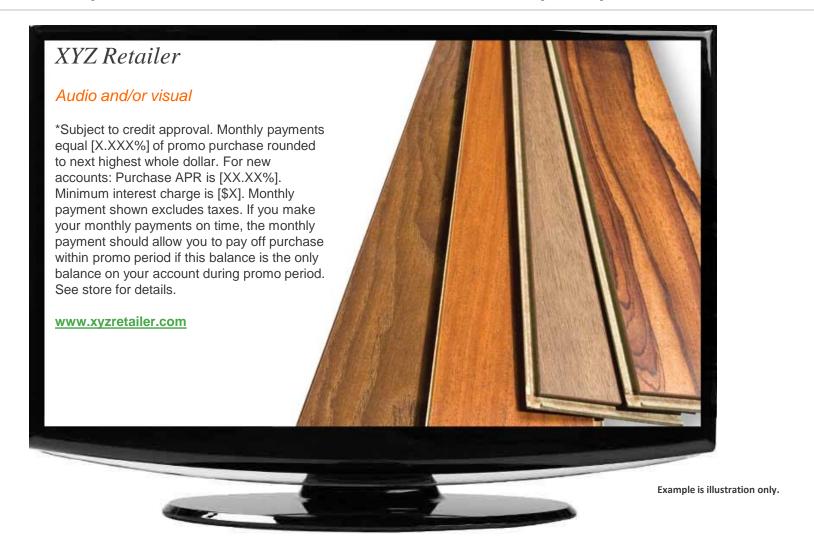


#### Audio and/or On-screen Visual

[date] – [date] get [Insert product] for \$XX per month for XX months on a purchase of \$X,XXX, with 0% interest for XX months financing with your [Retailer] Credit Card.\*



# TV: Fixed Payments/Reduced APR With Monthly Payments



#### Audio and/or On-screen Visual

[date]-[date] get [insert product] for [\$XX] per month for [XX] months at [X.XX%] APR on a purchase of \$XXXX. Total payments [\$XXXX] with your [Retailer] Credit Card.



# Small and Large Format Advertising

Advertising promotional financing is discouraged for items either too small, or with too simple of a format to support the required headline, subhead and supporting disclosure.

Generic advertising headlines are recommended.

#### Types of advertising this applies to:

- Buttons
- T-shirts
- Door Decals
- Stickers
- **Price Tags**
- Banners
- Billboards

#### Example is illustration only.

Ask your Synchrony Financial representative to provide specific promotion language based on the offer selected, or access Advertising Center at www.synchronybusiness.com



# **Promotional** Financing Available\*

\*Subject to credit approval. Minimum monthly payments required. See store for details.

(i.e., banner/sign)

Supporting disclosure minimum 8pt font required.

YOUR MERCHANT NAME HERE

YOUR NAME HERE

1234 5678 9012 3456



CREDIT CARD

# Social Media Promotional Advertising Examples













# Twitter



### (140-character limit)

Due to character limitations, trigger term or combo advertising are not options on Twitter. Generic offers only.



#### Example is illustration only.



### Facebook



#### Main Headline

May be trigger term (equal payments/no interest), combo, or generic

#### Subhead

Must be included in post

### Supporting Disclosure

· Full disclosure of offer must be one click away (link in post)

### See Retail Advertising Disclosure Template for wording

Generic

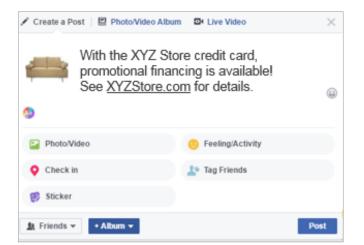


### Combo

# Trigger

#### Example is illustration only.









# Instagram—Generic



# Instagram

#### Main Headline

Generic

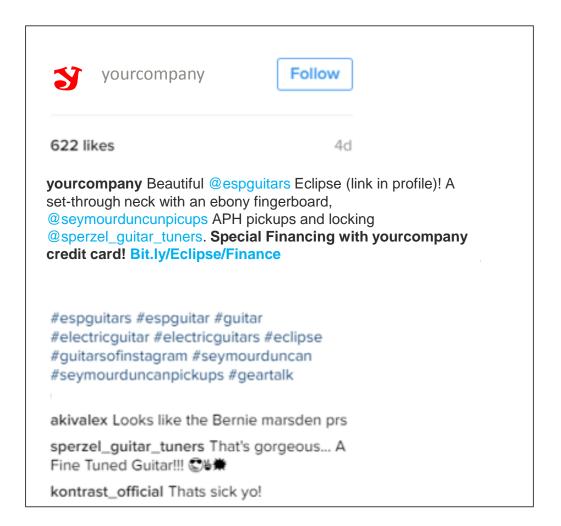
#### Subhead

Not needed

#### Supporting Disclosure

• Full disclosure of offer must be one click away. (Use a bit.ly link)

Copy example: Special Financing with your [card name] credit card! Bit.ly/offers/finance



Example is illustration only.



# Instagram—Combo



# Instagram

#### Main Headline

Combo headline

#### Subhead

Included in post

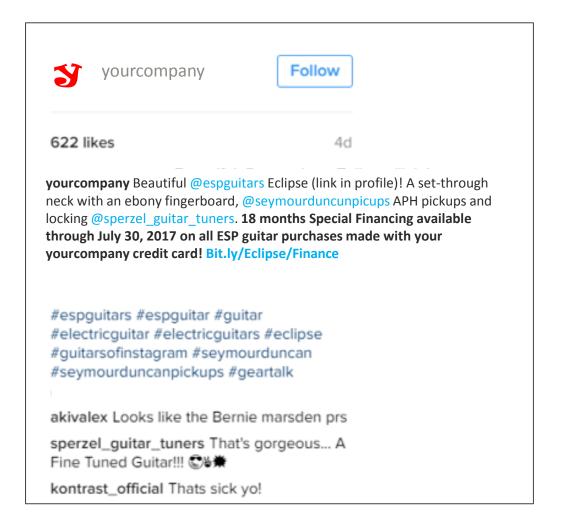
### Supporting Disclosure

• Full disclosure of offer must be one click away. (Use a bit.ly link)

### Copy example:

[XX] months Special Financing available through [date] on all [product] purchases made with your [card name] credit card.

Bit.ly/offers/finance



Example is illustration only.



# Instagram—Trigger Term



# Instagram

#### Main Headline

 Trigger headline (Equal Payments/No Interest)

#### Subhead

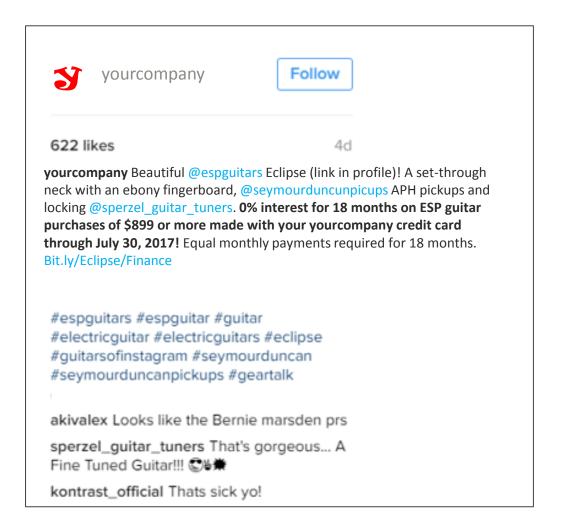
Included in post

### Supporting Disclosure

Full disclosure of offer must be one click away. (Use a bit.ly link)

### Copy example:

0% interest for [XX] months on [product] purchases [of \$XXX or more] made with your [card name] credit card through [date]! Equal monthly payments required for [XX] months. Bit.ly/offers/finance



Example is illustration only.



# YouTube—Generic



#### Main Headline

Generic

#### Subhead

Not needed

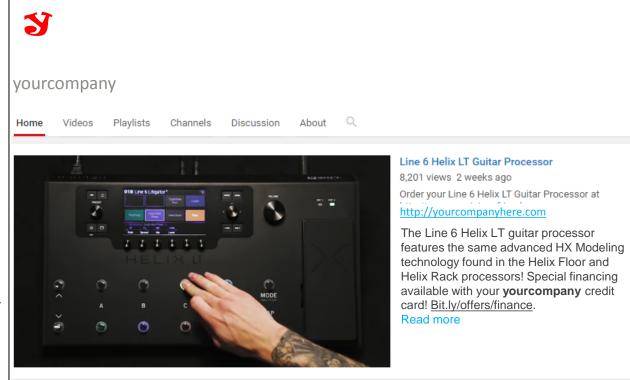
#### Supporting Disclosure

 Full disclosure of offer must be one click away. (Use a bit.ly link)

### Copy example:

Special Financing available with your [card name] credit card!

Bit.ly/offers/finance



Example is illustration only.



# YouTube—Combo



#### Main Headline

· Combo headline

#### Subhead

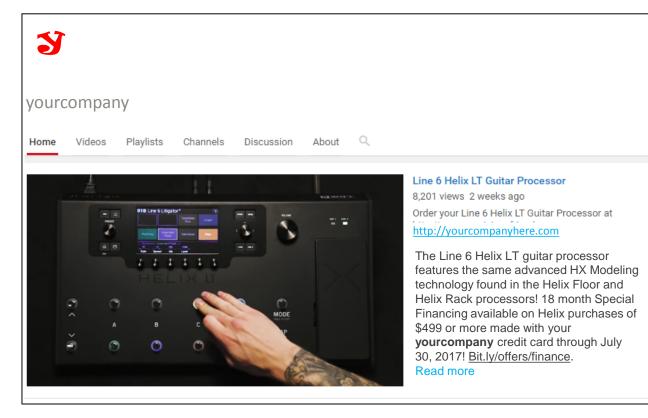
Included in post

### Supporting Disclosure

 Full disclosure of offer must be one click away. (Use a bit.ly link)

### Copy example:

[XX] month Special Financing available on [product] purchases [of \$XXX or more] made with your [card name] credit card through [date]! Bit.ly/offers/finance



#### Example is illustration only.



# YouTube—Trigger Term



#### Main Headline

 Trigger term (equal payments/no interest)

#### Subhead

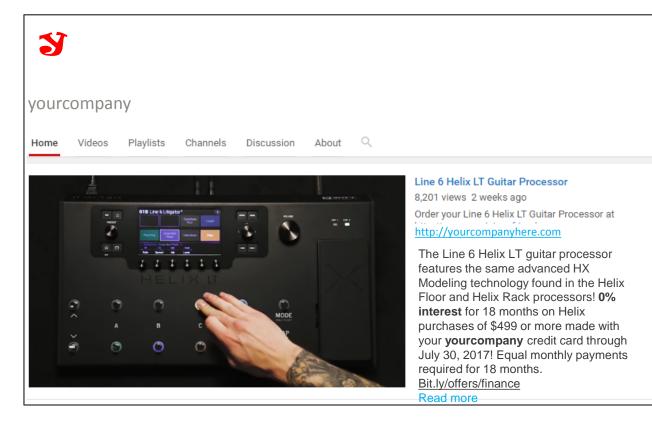
Included in post

### Supporting Disclosure

Full disclosure of offer must be one click away. (Use a bit.ly link)

### Copy example:

0% interest for [XX] months on [product] purchases [of \$XXX or more] made with your [card name] credit card through [date]! Equal monthly payments required for [XX] months. Bit.ly/offers/finance



Example is illustration only.



# Pinterest—Generic



#### Main Headline

Generic

#### Subhead

Not needed

### Supporting Disclosure

• Full disclosure of offer must be one click away. (Use a bit.ly link)

Copy example: Special financing available with your [card name] credit card! Bit.ly/offers/finance

#### Example is illustration only.

Ask your Synchrony Financial representative to provide specific promotion language based on the offer selected, or access Advertising Center at www.synchronybusiness.com



20 Rustic DIY and Handcrafted Accents to Bring Warmth to Your Home Decor

Rustie Amp 20 Rustio

We've got everything you need for a warm and cozy home. Special financing available with your yourcompany credit card. Bit.ly/offers/finance





### Pinterest—Combo



#### Main Headline

• Combo

#### Subhead

Included in post

### Supporting Disclosure

 Full disclosure of offer must be one click away. (Use a bit.ly link)

### Copy example:

[XX] months special financing available on [product] purchases [of \$XXX or more] made with your [card name] credit card through [date]! Bit.ly/offers/finance

#### Example is illustration only.

Ask your Synchrony Financial representative to provide specific promotion language based on the offer selected, or access Advertising Center at www.synchronybusiness.com



20 Rustic DIY and Handcrafted Accents to Bring Warmth to Your Home Decor

Rustie Amp 20 Rustio Rustin Diye-

Make a warm and cozy home with simple financing.18 months special financing available on pillow purchases of \$199 or more made with your yourcompany credit card through July 30, 2017. Bit.ly/offers/finance



# Additional Advertising Guidelines



# Combo/Generic Headlines: Approved Headlines

It is important that advertising headlines are true statements. For example, "Buy now, pay later" is not true because it implies that a payment is not needed in the near future, when in fact minimum monthly payments are required for all purchases made with a Synchrony Bank credit card.

#### Here are some things to avoid:

- Promotional financing headlines that could be confused with installment loan or closed-end loan products
- Claims that cannot be substantiated (comparisons/superlatives, etc.)
- Advertising that implies consumers cannot afford to make their purchase without financing

You can use any of the approved headlines below and add a promotional period to it, making it a "Combo Headline" (i.e., Ask about 12 months promotional financing with an XX credit card – or show image of credit card in lieu of including the credit card name – and include promo dates if not an everyday offer).

- Special financing available\*
- Buy smart with financing\*
- Smart financing makes it possible\*
- Plan well, pay smart
- Ask about the power of financing\*
- Make it possible with financing\*
- Fast, simple, smart financing available\*
- Stretch your money, financing available\*
- Ask about financing options\*
- Choose your way to pay--financing available\*
- Convenient financing options available\*
- Financing puts you in control\*
- It's quick and easy\*
- **Great Financing\***
- Financing made simple\*
- Dream big. Get it now with easy financing.\*

- Crank up the volume with financing\*
- Ride it out the door today with financing\*
- Sleep well today with financing\*
- Upgrade your gear with great financing.\*
- Make it yours with monthly payments\*
- Easy financing available\*
- The budget smart way to pay. Financing available\*
- Take it home today\*
- Easy financing makes it sound even better\*.
- The (guitars) you want with simple financing\*.
- Get the gear, and pay over time.\*
- Get a great deal and special financing.\*
- Make your whole home happy. Take advantage of special financing.\*
- Financing is just a click away.\*
- Fast and flexible financing.\*
- Now you can dream it and buy it with great financing options.\*

- Music to your ears and budget\*
- Buy now with smart financing\*
- Get it today(now) with financing\*
- Beautiful furniture, attractive financing\*
- Play hard with easy financing\*
- Easy financing\* for hard working equipment
- Buying is easier than you think. Financing available\*
- Promotional financing available\*
- Apply today\*
- Affordable financing options\*
- Special financing options with convenient monthly payments\*

NOTE: "Same as Cash" is never an approved headline, as this is misleading to consumers.

\*Subject to credit approval.



NOTE: For questions on headlines please contact your Synchrony Financial representative.

# Combo/Generic Headlines: More ideas

It is important that advertising headlines are true statements. For example, "Buy now, pay later" is not true because it implies that a payment is not needed in the near future, when in fact minimum monthly payments are required for all purchases made with a Synchrony Bank credit card.

#### Here are some things to avoid:

- Promotional financing headlines that could be confused with installment loan or closed-end loan products
- Claims that cannot be substantiated (comparisons/superlatives, etc.)
- Advertising that implies consumers cannot afford to make their purchase without financing

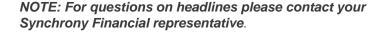
You can use any of the approved headlines below and add a promotional period to it, making it a "Combo Headline" (i.e., Ask about 12 months promotional financing with an XX credit card - or show image of credit card in lieu of including the credit card name - and include promo dates if not an everyday offer).

- Get your new look for your home with easy financing.\*
- New year (season), new look, easy financing!\*
- Financing with convenient monthly payments.\*
- Fast and flexible financing options.\*
- Click for flexible financing.
- Financing is just a click away.\*
- Financing made easy.\*
- Open an account, shop, and pay your way.\*
- Easy monthly payments make it simple.\*
- Stretch your budget with convenient monthly payments.\*
- Easy financing can make it look even better.\*
- With easy financing, we've got you covered.\*
- Special financing can help you get the look you want.\*
- Special financing can help you get it.\*

- We've got you covered, with special financing.\*
- Special financing can give you extra shopping flexibility.\*
- Relax in style. Enjoy special financing.\*
- You design it, we'll help you bring it home.
- Make your house a home with special financing.\*
- Create room for the whole family with easy financing\*.
- Sleep better with special financing.\*
- Get extra sparkle with simple financing.\*
- Say I DO with special financing.\*
- Make the day extra special. Ask about financing!\*
- Take time to pay. Special financing available now\*.
- More sparkle, more shine and special financing.\*
- Make it yours with these great financing offers.\*
- Enjoy special financing on our collection of...\*
- No hassle financing is here.\*
- Apply and buy today! (Cannot be combined with an offer)
- Recline in style with special financing.\*
- There's a better way to get what you want. Special financing available.\*

\*Subject to credit approval.

NOTE: "Same as Cash" is never an approved headline, as this is misleading to consumers.





# Advertising Multiple Offers That Require The Credit Card

The ad should clearly show which offers are only available with the credit card.

Each offer should have the required disclosure linked to it with a unique identifier, such as + or \*.

The disclosure below should be included in the supporting disclosure. Or, can be added as a separate standalone disclosure. This disclosure is for retail offers such as "No Down Payment" or "Free Delivery" when the credit card is used.

[Client Name] offers [benefit] if the purchase is made with your [Credit Card Name] card.

#### In the example:

XYZ Retailer provides Free Delivery if the purchase is made with an XYZ Retailer Credit Card.

- The disclosure for Free Delivery is provided separately from the promotional financing disclosure.
- It could also be added to the promotional financing disclosure.
- Any restrictions or limitations need to be added.





# Advertising Multiple Offers: Only One Offer Requires the Credit Card

The ad needs to clearly show that the promotional financing requires use of the credit card, but the retail (other) offer does not.

When both a retail offer that does not require use of the credit card AND a promo financing offer are available and can be combined, use the guidelines below:

- Show offers next to each other. Place the credit card requirement directly under the promotional financing offer
- Show offers in close proximity to each other
- Show offers with or without a divider, but separate them
- Use a connecting word or symbol such as "Plus" or "+"





# Offering Rebates/Discounts/Coupons

### Guidelines for advertising retail rebates, discounts or coupons in the same advertisement as a financing promotion:

If a coupon, rebate or discount associated with the credit card will impact the qualifying purchase amount of a promotional financing offer, additional language needs to be added to the subhead and supporting disclosure of the promotional financing offer.

### **Subhead Additional Language:**

"Discounts; Rebates; Coupons applied at time of purchase will reduce your total purchase amount." or add "after discounts" after minimum purchase amount.

### **Supporting Disclosure Additional Language:**

\*Any discount, coupon, manufacturer rebate, or other promotional offer applied at time of purchase will reduce your total purchase amount and may result in you not satisfying the minimum qualifying purchase amount required."

**Note:** If there is NOT a minimum purchase required for promotional financing, OR the financing promotion will be honored by retailer regardless of whether the discount, rebate or coupon drops the purchase price below the eligible minimum purchase price, then the disclosures in the subhead and supporting disclosure are not necessary.



## **XX Months Promotional Financing\***

On purchases of [\$XXX and more] [after discounts] made with your XYZ Retailer credit card [date] - [date]. [Discounts; Rebates; Coupons applied at time of purchase will reduce your total purchase amount.]



On your purchase when you open an XYZ Retailer credit card.

\*Subject to credit approval. Minimum monthly payments required. See store for details. Any discount, coupon, manufacturer rebate, or other promotional offer applied at time of purchase, will reduce your total purchase amount and may result in you not satisfying the minimum qualifying purchase amount required.

\*\*5% product sale discount is applied at time of purchase to the total purchase price (excluding tax and delivery).

#### Example is illustration only.



# Advertising With Multiple Headline Types (Trigger and Combo)

The example at right shows how to advertise two offers, one with a combo headline and the other with a trigger headline.

If the same offer (promo type and promo length) is being advertised with a combo and trigger headline, then the same trigger term disclosure can be used.

In all other cases, the required combo disclosure and the required trigger term disclosure should be used for each headline. Each offer headline should have a unique identifier (such as \* or +) that links to its respective disclosure.

#### **Print Example**



\*[Insert any product or purchase limitations or restrictions that are not in the headline.] [Qualifying purchase amount must be or one receipt.] No interest will be charged on the promo purchase if you pay it off, in full, within the promo period. If you do not, interest will be charged on the promo purchase from the purchase date. The required minimum monthly payments may or may not pay off the promo purchase by the end of the promo period. Regular account terms apply to non-promo purchases and. after promo period ends, to the remaining promo balance. For new accounts: Purchase APR is [XX.99%]. Minimum interest charge is [\$X]. Existing cardholders: See your credit card agreement terms. Subject to credit approval.

Example is illustration only.



# Repeated Trigger Headlines Usage (When Offer Is The Same)

A subhead is only required with the first headline or the most prominent headline on the page.

Once a subhead has been used on the page, it does not need to be repeated with every mention of the headline on that page.

# **NO INTEREST for XX months\***

On all purchases made with your XYZ credit card from [date] - [date]. XX equal monthly payments required.

#### STEARNS & FOSTER firm or plush euro pillowtop



e Steams & Foster collection uses only the finest silks from around the world. Beyond its luxurious luster and feel, silk regulates heat exceptionally well.

No interest for XX months\*

#### STEARNS & FOSTER ESTATE firm, ultra firm, firm euro pillowtop or



The luxurious feel of cashmere has brought warmth and comfort to the world for over 3,000 years, and with the Steams & Foster Estate collection, you can experience that warmth and comfort every night.

No interest for XX months'

### STEARNS & FOSTER LUX ESTATE



From its New Zealand Joma wool and eco-cotton, to its layers of comforting memory roam or latex foam. the Steams & Foster Lux Estate collection provides the most luxurious sleeping experience we've ever created.

No interest for XX months\*





\*[Insert any product or purchase limitations or restrictions that are not in the headline.] [Qualifying purchase amount must be on one receipt.] No interest will be charged and equal monthly payments are required on promo purchase until it is paid in full. These payments equal the total promo purchase amount divided by the number of months in the promo period and rounded up to the next whole dollar. These payments may be higher than the payments that would be required if this purchase was a non-promo purchase. Regular account terms apply to non-promo purchases. For new accounts: Purchase APR is [XX.XX%]. Minimum interest charge is [\$X]. Existing cardholders: See your credit card agreement terms. Subject to credit approval

#### Example is illustration only.



# "Up To" Headlines (Trigger Term)

Using the words "Up To" can be misleading if not referenced properly. It could imply that there is other information (and there usually is) not being disclosed.

Using "Up to" language in a trigger term headline is not compliant unless all the possible promo term types are detailed in the headline and subhead. In addition, any reasonable applicant should be able to qualify for all purchases "up to" the amounts advertised.

#### **EQUAL PAYMENTS/NO INTEREST TRIGGER EXAMPLE**

#### No Interest for X, XX, or XXX Months\*

On [certain, select, qualifying] purchases made with your [program name] credit card [date] - [date]. [X, XX, or XXX equal monthly payments required] or [equal monthly payments required for XX, XX, or XXX months].

- [Purchases of \$XXX or more qualify for XXX month offer] or [XXX month offer applies to purchases of \$XXX or more]
- [Purchases of \$XX \$XX qualify for XX month offer] or [XX month offer applies to purchases of \$XX - \$XXX]
- [Purchases up to \$X qualify for X month offer] or X month offer applies to purchases up to \$X] or [X month offer applies to all other purchases]

\*Qualifying purchases must be on one receipt. No interest will be charged and equal monthly payments are required on promo purchase until it is paid in full. These payments equal the total promo purchase amount divided by the number of months in the promo period, which may be X, XX, or XXX months, and rounded up to the next whole dollar. These payments may be higher than the payments required if this purchase was a non-promo purchase. Regular account terms apply to non-promo purchases. For new accounts: Purchase APR is XX.XX%. Minimum interest charge is \$X. Existing cardholders: See your credit card agreement terms. Subject to credit approval.

#### DEFERRED INTEREST TRIGGER EXAMPLE

#### No Interest if Paid in Full within X, XX, or XXX Months\*

On [certain, select, qualifying] purchases made with your [program name] credit card [insert dates]. Interest will be charged to your account from the purchase date if the promotional purchase is not paid in full within the promotional period. Minimum monthly payments required.

- [Purchases of \$XXX or more qualify for XXX month offer] or [XXX month offer applies to purchases of \$XXX or more]
- [Purchases of \$XX \$XX.XX qualify for XX month offer] or [XX month offer applies to purchases of \$XX - \$XXX]
- [Purchases up to \$X qualify for X month offer] or [X month offer] applies to purchases up to \$X] or [X month offer applies to all other purchases]

\*Qualifying purchases must be on one receipt. No interest will be charged on the promo purchase if you pay it off, in full, within the promo period which may be X, XX, or XXX months. If you do not, interest will be charged on the promo purchase from the purchase date. The required minimum monthly payments may or may not pay off the promo purchase by the end of the promo period. Regular account terms apply to non-promo purchases and, after promo period ends, to the remaining promo balance. For new accounts: Purchase APR is XX.XX%. Minimum interest charge is \$X. Existing cardholders: See your credit card agreement terms. Subject to credit approval.



# "Up To" Headlines (Combo)

#### To advertise more than one promo period in combo headline:

- For multi-page advertisements or online, the details must be "one click away" (for single-page ads, details must appear on that page).
- Use a combo headline with "up to" promo period; the subhead must be on the first page promotional financing is shown.
- Refer to other page (or click here) to redirect a consumer to where all promo period thresholds in range are detailed.

#### On the first page/advertisement:

Headline: Up to [24] Months Promotional Financing\*

Subhead: On qualifying purchases made with your [Card Name] between [date X and date X].

Supporting disclosure: \*See [page x] for details.

On following/or different page (multipage ad) same page (single page ad) pop-up box/one click away: All promo period tiers that are included in the "up to" promo period must be listed.

Headline: [12] Months Promotional Financing\*

Subhead: on (insert product limitations) up to \$XXX.99

Headline: [18] Months Promotional Financing\*

Subhead: on (insert product limitations) \$XXX to \$XXX.99

Headline: [24] Months Promotional Financing\*

Subhead: on (insert product limitations) of \$XXX or more

Secondary subhead: on purchases made on your (card name) between [date X and date X].

Include supporting disclosure either on the bottom of the page with the promo period details, or on a different page.

If on the same page, then asterisk to footnote.

Supporting Disclosure: \*Subject to credit approval. Minimum monthly payments required. [Insert product exclusions if applicable]. See store for details.

#### If on a different page (or one click away), then redirect with language such as:

"See page [X] for details." Or "Click here for details." Then on that redirected page, include the supporting disclosure.

Supporting Disclosure: \*Subject to credit approval. Minimum monthly payments required. [Insert product exclusions if applicable]. See store for details.

NOTE: Combo "Up To" language can refer to Equal Payment/No Interest, Fixed Payment/Reduced APR, and/or Deferred Interest promotions provided the full trigger term headline/subhead and disclosure are provided to the consumer in sufficient time prior to the purchase in order for them to make an informed decision.



# Combo "Up To" Example

#### PAGE 1

# XYZ, Retailer

# **Up To 24 Months Promotional** Financing\*

On qualifying purchases made with your XYZ Retailer Card [date] - [date].

\*See page 2 for details.







### PAGE 2

- 12 Months Promotional Financing\* on a purchase up to \$299.99
- 18 Months Promotional Financing\* on a purchase of \$300 \$499.99
- 24 Months Promotional Financing\* on a purchase of \$500 or more made with your XYZ Retailer Credit Card [date] - date].

\*Subject to credit approval. Minimum monthly payments required. See store for details.

NOTE: This example shows three different promo periods. However, there could be two or more promo tiers applicable within the "up to" range advertised.





# Monthly Payment Advertising Guidelines - General

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# Monthly Payment Advertising—General

#### **Minimum Monthly Payments Headline**

The generic reference to "minimum monthly payments" in a headline, subhead or other copy does not necessarily require an additional disclosure.

However, if the specific amount of a monthly payment for a certain item or amount financed is displayed, then the following additional information must be provided in equal prominence (the same font size) on the same page as the monthly payment amount:

- The time period required to pay off the item/amount financed in full if only those monthly payments are made (number of months)
- The total dollar amount of all the payments (including any applicable interest) to pay off the item/amount financed

NOTE: If more than one monthly payment is advertised on a page, the number of months to pay off each balance and the total amount of payments for each item must be clearly identified and provided in equal prominence for each monthly payment option. Additional headlines can be advertised on the page with the promotional period shown in a larger font, provided there is one mention of the promotional period that is equally prominent to the Total Payment Amount and Monthly Payment.

"As low as" language is strongly discouraged since monthly payment ads must be specific to the product advertised.

#### **Monthly Payment Information**

The "time period required to pay off" and "total amount of all payments" is not required to be directly next to the monthly payment amount, but it must be equally prominent (see above) and on same page. A consumer must be able to tie all three pieces of information together.

#### **Headline and Subhead**

Like any other promotional advertisement, the material terms associated with the monthly payment must be shown in the subhead. The supporting disclosure provides the other important additional details. Information that should be included in the subhead include:

- If the monthly payment is only applicable when the consumer uses a specific credit card (an alternative is to show a picture of the card)
- If the monthly payment is calculated, assuming a specific promotion applies
- If there are any time or other restrictions to the promotion

#### **Supporting Disclosures**

Information that should be included in the supporting disclosure for the monthly payment:

- Details of how it is calculated
- Assumptions about when payments are made and other balances on the account

The disclosure must include (1) the supporting disclosure for the monthly payment and (2) a separate supporting disclosure for any applicable promotion. These disclosures can be on the same page as the advertisement, within the same document if multi-page with the appropriate redirect, or no more than one click away if on a website/digital asset.



# Monthly Payment Ad-Equal Payments/No Interest

### **Type of Credit Card Promotion:**

#### **EQUAL PAYMENTS/NO INTEREST**

This illustrates how to advertise a monthly payment when a specific promotion applies, and a trigger term headline is used.

#### **Monthly Payment Info**

- · Number of months to pay off balance and total amount of payments (just the numbers) need to be same font size as the advertised monthly payment.
- Must be on same page or screen. Consumer must be able to easily connect all of the required information.

#### Headline and Subhead

The material terms associated with the monthly payment must be provided. Information that should be in the subhead include:

- If the monthly payment is only applicable when the specific credit card is used (or a picture of the card)
- · If the monthly payment is calculated assuming a specific promotion
- If there are any time or other restrictions to the promotion

#### **Equal Payments/No Interest Monthly Payment Disclosures**

 On single-page ads, disclosures must be on same page. On multi-page ads, this information can be on a different page as long as there is a redirect from the payment info subhead. On web pages, disclosures must be one click away.

### SAVE 10% ON STEARNS & FOSTER MATTRESS SETS

#### STEARNS & FOSTER

firm or plush euro pillowtop



The Stearns & Foster collection uses only the finest silks from around the world. Beyond its luxurious luster and feel, silk regulates heat exceptionally well.

#### \$2,412 or \$101/Month\*\*

#### STEARNS & FOSTER ESTATE

firm, ultra firm, firm euro pillowtop or plush euro pillowtop



The luxurious feel of cashmere has brought warmth and comfort to the world for over 3,000 years, and with the Steams & Foster Estate collection, you can experience that warmth and comfort every night.

#### \$3.828 or \$160/Month\*\*

#### STEARNS & FOSTER LUX ESTATE

firm euro pillowtop & plush euro pillowtop



From its New Zealand Joma wool and eco-cotton, to its layers of comforting memory foam or latex foam, the Stearns & Foster Lux Estate collection provides the most luxurious sleeping experience we've ever created.

\$4.891 or \$204/Month\*\*

No interest for 24 months on qualifying purchases made with your XYZ Retailer credit card 9/1/17-9/15/17. Monthly payments shown required for 24 months.\*





Insert any product or purchase limitations or restrictions that are not in the headline.] [Qualifying purchase amount must be on one receipt.] No interest will be charged and equal monthly payments are required on promo purchase until it is paid in full. These payments equal the total promo purchase amount divided by the number of months in the promo period and rounded up to the next whole dollar. These payments may be higher than the payments that would be required if this purchase was a non-promo purchase. Regular account terms apply to non-promo purchases. For new accounts: Purchase APR is [XX.XXX%]. Minimum interest charge is [\$X]. Existing cardholders: See your credit card agreement terms. Subject to credit approval. \*\*Monthly payment shown is equal to the purchase price (excluding [taxes and delivery]) divided by the number of months in the promo period, rounded to the next highest whole dollar, and only applies to the selected financing option shown. If you make your payments by the due date each month, the monthly payment shown should allow you to pay off this purchase within the promo period if this balance is the only balance on your account during the promo period. If you have other balances on your account, this monthly payr



Example is illustration only.

# Monthly Payment Ad-Fixed Payments/Reduced APR

### **Type of Credit Card Promotion:**

#### FIXED PAYMENTS/REDUCED APR

This illustrates how to advertise a monthly payment when a specific promotion applies, and a trigger term headline is used.

#### **Monthly Payment Info:**

- · Number of months to pay off balance and total amount of payments (just the numbers) need to be same font size as the advertised monthly payment.
- Must be on same page or screen. Consumer must be able to clearly connect all of the required information.

#### **Headline and Subhead**

The material terms associated with the monthly payment must be provided. Information that should be in the subhead include:

- If the monthly payment is only applicable when the specific credit card is used (or a picture of the card)
- · If the monthly payment is calculated assuming a specific promotion
- If there are any time or other restrictions to the promotion

#### Fixed Payments/Reduced APR Monthly Payment **Disclosures**

• On single-page ads, disclosures must be on same page. On multi-page ads, this information can be on a different page as long as there is a redirect from the payment info subhead. On web pages, disclosures must be one click away.

# Example is illustration only.

### SAVE 10% ON STEARNS & FOSTER MATTRESS SETS

#### **STEARNS & FOSTER**

firm or plush euro pillowtop



The Stearns & Foster collection uses only the finest silks from around the world. Beyond its luxurious luster and feel, silk regulates heat exceptionally well.

\$2,412 or \$107/Month\*\* Total payments of \$2,557

#### STEARNS & FOSTER ESTATE

firm, ultra firm, firm euro pillowtop or plush euro pillowtop



The luxurious feel of cashmere has brought warmth and comfort to the world for over 3,000 years, and with the Stearns & Foster Estate collection, you can experience that warmth and comfort every night.

\$3.828 or \$170/Month\*\* Total payments of \$4.058

#### STEARNS & FOSTER LUX ESTATE

firm euro pillowtop & plush euro pillowtop



From its New Zealand Joma wool and eco-cotton, to its layers of comforting memory foam or latex foam, the Stearns & Foster Lux Estate collection provides the most luxurious sleeping experience we've ever created.

\$4,891 or \$116/Month\*\* Total payments of \$5,184

5.99% APR for 24 months on qualifying purchases made with your XYZ Retailer credit card 9/1/17-9/15/17. 24 fixed monthly payments required for all monthly payments shown.\*





\*[Insert any product or purchase limitations or restrictions that are not in the headline.] [Qualifying purchase amount must be on one receipt.] Interest will be charged on the promo purchase from the purchase date at a reduced [XX.XX%] APR, and fixed monthly payments are required until paid in full. These payments are equal to X.XX% of initial promo purchase amount and rounded up to the next whole dollar. These payments may be higher than the payments that would be required if this

# Monthly Payment Advertising—Combo

### **Type of Credit Card Promotion:**

#### COMBO

Assumes promotion is Equal Payments/No Interest This illustrates how to advertise a monthly payment when a specific promotion applies and a combo headline is used. It can be used only if full details of the specific promotion are provided to cardholder via another channel prior to making the purchase.

#### **Monthly Payment Info:**

- Number of months to pay off balance and total amount of payments (not other text in this sentence) need to be same font size as the advertised monthly payment.
- Must be on same page or screen, but not necessarily in close proximity to monthly payment and headline/subhead.

#### **Headline and Subhead:**

The material terms associated with the monthly payment must be provided. Information that should be in the subhead include:

- If the monthly payment is only applicable when the specific credit card is used (or a picture of the card)
- If the monthly payment is calculated assuming a specific promotion
- If there are any time or other restrictions to the promotion

#### **Combo Supporting Disclosures:**

On single-page ads, disclosures must be on same page. On multi-page ads, this information can be on a different page as long as there is a redirect from the payment info subhead. On web pages, disclosures must be one click away.

### SAVE 10% ON STEARNS & FOSTER MATTRESS SETS

#### STEARNS & FOSTER

firm or plush euro pillowtop



The Stearns & Foster collection uses only the finest silks from around the world. Beyond its luxurious luster and feel, silk regulates heat exceptionally well.

#### \$2,412 or \$101/Month\*\*

#### STEARNS & FOSTER ESTATE

firm, ultra firm, firm euro pillowtop or plush euro pillowtop



The luxurious feel of cashmere has brought warmth and comfort to the world for over 3,000 years, and with the Stearns & Foster Estate collection, you can experience that warmth and comfort every night.

#### \$3,828 or \$160/Month\*\*

#### STEARNS & FOSTER LUX ESTATE

firm euro pillowtop & plush euro pillowtop



From its New Zealand Joma wool and eco-cotton, to its layers of comforting memory foam or latex foam, the Stearns & Foster Lux Estate collection provides the most luxurious sleeping experience we've ever created.

\$4.891 or \$125/Month\*\*

Monthly payments shown are required for 24 months with 24 month promotional financing on your XYZ Retailer credit card.\*





\*Subject to credit approval. Minimum monthly payments required. See store for details.

\*\*The monthly payment shown equals the purchase price (excluding [taxes and delivery]) divided by the number of months in the promo period. It is rounded to the next highest whole dollar. It is only good for the financing shown. If you make these payments by the due date each month, you should pay off this purchase within the promo period, if it is the only balance you are paying off. If you have other balances on your account, this payment will be added to any other minimum monthly payments.

# Monthly Payment Advertising—Deferred Interest—Not a PDP

### **Type of Credit Card Promotion:**

#### **DEFERRED INTEREST**

#### **Monthly Payment Info:**

- Number of months to pay off balance and total amount of payments need to be same font size as the monthly payment.
- Must be on same page or screen, but not necessarily in close proximity to monthly payment and headline/subhead

#### **Headline and Subhead:**

The material terms associated with the monthly payment must be provided. Information that should be in the subhead include:

- If the monthly payment is only applicable when the specific credit card is used (or a picture of the card)
- If the monthly payment is calculated assuming a specific promotion applies
- If there are any time or other restrictions to the promotion

### **Deferred Interest Supporting Disclosures:**

- There are two disclosures required: one for deferred interest and one for monthly payments.
- On single-page ads, disclosures must be on same page. On multi-page ads, this information can be on a different page as long as there is a redirect from the payment info subhead. On web pages, disclosures must be one click away.

Example is illustration only.

### SAVE 10% ON STEARNS & FOSTER MATTRESS SETS

#### STEARNS & FOSTER firm or plush euro pillowtop



The Stearns & Foster collection uses only the finest silks from around the world. Beyond its luxurious luster and feel, silk regulates heat exceptionally well.

\$2.412

#### STEARNS & FOSTER ESTATE

firm, ultra firm, firm euro pillowtop or plush euro pillowtop



The luxurious feel of cashmere has brought warmth and comfort to the world for over 3,000 years, and with the Stearns & Foster Estate collection, you can experience that warmth and comfort every night.

\$3.828

#### STEARNS & FOSTER LUX ESTATE

firm euro pillowtop & plush euro pillowtop



From its New Zealand Joma wool and eco-cotton, to its lavers of comforting memory foam or latex foam, the Stearns & Foster Lux Estate collection provides the most luxurious sleeping experience we've ever created.

\$4,891

#### No Interest if Paid in Full Within 24 Months\*

On purchases with your XYZ Credit Card made between 8/1/17-8/31/17.

Interest will be charged to your account from the purchase date if the promotional purchase is not paid in full within 24 months. Minimum monthly payments required. See page [XX] for details.

The Optional Equal Monthly Payments shown below may be greater than the required minimum monthly payment that will be on your billing statement when you use the 24 month promotional financing offer. These payments:

- Equal the promotional purchase amount divided by 24 (excluding taxes and shipping charges).
- Would pay off the promotional purchase amount within 24 months, but only if there are no other balances on your account at any time during the 24 month promotional period and you make your payments on time. Your total payments will equal the amount of the promotional purchase amount.

If the promotional purchase amount is not paid in full within 24 months, interest will be charged to your account from the purchase date and your total payments will be greater than the amount of the promotional purchase amount.

Promotional	Optional Equal	Promotional
Purchase Amount	Monthly Payment	Period
\$2,412	\$101	24
\$3,828	\$160	24
\$4,891	\$204	24



# Other Guidance and Options

#### **Abbreviations**

There are a number of approved advertising-related abbreviations that are allowed in cases of limited space. Some of the most popular abbreviations are listed below. If you have additional questions, please contact your Synchrony Financial representative.

#### 'till or 'til

Can be used where "until" would be used in a headline, subhead or disclosure, when space is an issue. For example, No interest 'til January, 2019

#### Mos.

Can be used where "months" would be used in a headline, subhead or disclosure. For example, **No interest for 24 mos.** 

#### 0

Can be used in deferred interest advertising where "zero" would be used in a headline. Please note that 0% may NOT be used in deferred interest advertising. For example, when advertising deferred interest: 0 Interest if paid in full within 24 months

### No Annual Fee

The phrase "No Annual Fee\*" is a trigger term requiring the following disclosure: \*For new accounts: Purchase APR is [XX.99%]. Minimum interest charge is \$2.

### **Payment Estimator (NEW)**

Online payment estimator tool for monthly payments is now available at www.synchronybusiness.com.

For a *customized* online payment estimator option or printed payment estimators, ask your Synchrony Financial representative for details.



# References Tools and Support

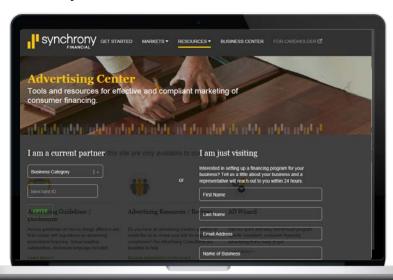
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# Reference Tools and Support

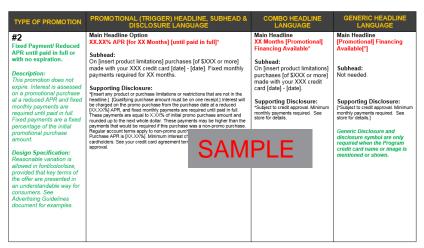
### Visit Advertising Center (www.synchronybusiness.com) to access these tools:

- Advertising Guidelines (this document)
- Online Payment Estimator (NEW)
- Advertising Disclosure Templates (market specific)
  - Retail Markets
  - Home Specialty (formerly called HI/HVAC)
  - Outdoor Power Equipment
- Advertising Tips and Tools

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