

CHECKLIST

AI Call Disclosure Checklist

Checklist for broker AI calls: when the agent says it's AI, how the recording notice is worded, how opt-outs work and what each country needs reviewed.

WHO IT IS FOR

Broker compliance officers, campaign owners and ops leads preparing an AI-voiced outbound campaign to registered, demo or dormant traders.

TIME TO COMPLETE

60 minutes plus compliance review

This checklist covers the words an AI voice agent says in the first thirty seconds of a call to a trader, and the records that back those words up. Work through it with your compliance officer before a dormant trader campaign goes live and you'll have a script that identifies itself as AI, gives a recording notice where one is needed, handles opt-outs without a fight and is signed off per country. It tells you what to review and who signs, not what the law concludes.

1 The agent identifies itself as AI

The trader should know they're talking to an automated agent before they say anything of substance. Decide the wording once, then apply it to every script.

- ☐ **Write the opening line so the agent names the brokerage and states it's an AI assistant inside the first sentence.**

Something like "Hi, this is the automated assistant from [Broker] calling about your trading account" does it. Burying the disclosure after a pitch reads as hiding it.

- ☐ **Decide whether the agent uses a human-sounding name, and if it does, pair it with "AI assistant" every time the name is used.**

A first name on its own invites the trader to assume a person. "Ana, the AI assistant at [Broker]" doesn't.

- ☐ **Script a direct answer for "Am I talking to a robot?" and "Is this a real person?" that confirms it's AI and offers a human.**

Test the agent with both questions and three rephrasings. Any answer that dodges, jokes or claims to be human fails the check.

- ☐ **Repeat the AI disclosure when the call is transferred to a human, and have the human say they're a person.**

Traders who were told "AI" at the start should hear when that changes. The handoff line is where confusion happens most.

- ☐ **Confirm the voicemail script carries the same AI disclosure as the live script.**

Voicemails are the version of the call your compliance officer is least likely to hear. Check the recording of one.

- ☐ **Set a rule for callbacks: when a trader returns a missed call, the inbound greeting also identifies the agent as AI.**

The disclosure obligation doesn't disappear because the trader dialled first.

- ☐ **Check the disclosure in every language the campaign runs in, read by a native speaker.**

"AI assistant" translates badly in some languages and comes out as "artificial intelligence secretary" or worse. Topcalls agents run in up to 78 languages, so the review list can be long.

2 Recording and monitoring notice

Brokerages record calls for two different reasons, marketing quality and MiFID II order records, and the notice has to cover the reason that applies. Confirm the wording with your compliance officer or counsel.

- ☐ **State in the opening whether the call is recorded, before the trader has said anything the recording would capture.**

A notice given at minute two has already missed the trader's first answers. Put it right after the AI disclosure.

- ☐ **Say why it's recorded in one short clause: quality, training, regulatory record keeping, or all three.**

The purpose stated on the call should match the purpose in your privacy notice and your data retention schedule.

- ☐ **Map which US states on the list treat recording as all-party consent, and script an explicit "is that okay?" for those numbers.**

One-party and all-party states differ. Your counsel decides the split; the script needs a branch for each.

- ☐ **Decide what the agent does when the trader says no to recording: end the call, continue unrecorded, or offer a human callback.**

"Continue unrecorded" only works if the platform can actually stop recording mid-call. Test that it does before the script promises it.

- ☐ **Review with compliance whether any call could touch orders, execution or investment advice, which brings MiFID II recording rules into scope.**

A reactivation call that turns into "can you place that trade for me" is a different record. Decide in advance whether the agent refuses and hands off.

- ☐ **Confirm the transcript is treated as part of the recording for retention and access-request purposes.**

Traders who ask for their data expect the text as well as the audio.

3 Opt-out and do-not-call handling

Every trader gets a way to stop the calls that works on the first try, and the CRM has to know about it before the next dial.

- ☐ **List every phrase the agent treats as an opt-out: "stop calling", "take me off your list", "don't contact me", "unsubscribe", plus the equivalents in each campaign language.**

Test each phrase on a live call. The agent should confirm the opt-out in one sentence and end the call, not argue or pitch again.

- ☐ **Script the confirmation line: the agent repeats that the number will not be called again and says how long it takes to apply.**

"You won't hear from us again by phone" is enough. Don't add "unless".

- ☐ **Write the opt-out to the CRM and the suppression list as soon as the call ends, with the recording timestamp.**

Before the next campaign run, not at the end of the day. A trader who opted out at 10:00 and got called at 10:40 files the complaint.

- ☐ **Separate "don't call me about marketing" from "don't call me at all" and store them as different flags.**

The first still permits a KYC reminder or a margin call. The second doesn't. Compliance decides which calls survive each flag.

- ☐ **Decide how the agent handles a request to be deleted rather than just not called, and who follows up.**

Under GDPR that's an erasure request with its own process. The agent should acknowledge it and route it, not promise the result.

- ☐ **Check the national do-not-call registries for every country on the list before the first dial and on a schedule after that.**

The US national DNC list, Bloctel in France, TPS in the UK and the Canadian list under CASL each have their own refresh rhythm. Your compliance officer sets the schedule.

- ☐ **Test the whole loop end to end: opt out on a test call, then confirm the number is refused by the next campaign run.**

Loop test passed on: _____ (date)

4 Script wording review

Read every line the agent can say with the disclosure rules next to it. This section is the one to print for the compliance sign-off meeting.

- ☐ **Read the full opening script aloud and time how many seconds pass before the trader has heard: who's calling, that it's AI, that it's recorded, and why.**

Seconds to full disclosure: _____

- ☐ **Remove any line that implies the agent is a person: "I remember", "I was looking at your account this morning", "my colleague".**

These are the phrases an AI script writer adds to sound warm. Each one contradicts the disclosure two sentences earlier.

- ☐ **Check every mention of returns, bonuses, spreads or leverage against your financial promotion rules before it goes in a script.**

An AI agent repeats the line thousands of times. If it's a financial promotion, it needs the same approval a web page would get. FCA-regulated firms have a specific sign-off process for this.

- ☐ **Confirm the agent never gives investment advice and has a scripted refusal plus a handoff for "what should I buy?".**

The safe refusal is short: "I can't advise on trades, but I can connect you with the team."

- ☐ **Strip pressure language: "today only", "last chance", "you're missing out".**

Beyond the promotion rules, these lines raise complaint rates on dormant traders who already left once.

- ☐ **Add a line the agent uses to close every call that states who to contact with questions and how.**

A support email or phone number the trader can use later. It's the cheapest complaint deflection you have.

- ☐ **Freeze the approved script with a version number and date, and log which version each campaign uses.**

Approved script version: _____

5 Per-jurisdiction review

The list below names the rules a broker's compliance officer usually reviews for each region. It's a starting list, not a legal conclusion; confirm each row with your compliance officer or counsel, and add the regulators for your own licences.

- ☐ **Split the calling list by the trader's country of residence, not by phone prefix alone.**

An EU resident with a UK mobile is still an EU resident for GDPR purposes.

- ☐ **Assign one named reviewer per jurisdiction and record their sign-off before that segment dials.**

"Compliance approved it" isn't a record. A name, a date and the script version are.

- ☐ **Hold any segment whose jurisdiction has no reviewer assigned.**

Cheaper than finding out later that nobody looked at the Australian numbers.

- ☐ **Note where a jurisdiction needs an AI-specific disclosure on top of the general automated-call rules, and adjust the opening line for that segment.**

Several US states and the EU AI Act's transparency provisions expect the person to be told they're dealing with an AI system. Keep the wording generic enough to survive your counsel's edit.

- ☐ **Record the calling hours allowed in each country and set them in the campaign schedule per segment.**

Local time at the trader's number, not the office's.

JURISDICTION	WHAT TO REVIEW	WHO SIGNS OFF
United States	TCPA and TSR consent for automated and AI-voiced calls, national and state DNC lists, state recording-consent rules, state AI disclosure rules	Compliance officer plus US counsel
European Union	GDPR lawful basis and objection right, ePrivacy national rules on marketing calls, EU AI Act transparency obligations, MiFID II recording where orders are involved	DPO or compliance officer
United Kingdom	UK GDPR, PECR marketing call rules, TPS screening, FCA financial promotion approval, recording rules for regulated activity	Compliance officer with FCA sign-off authority
Canada	CASL and CRTC telemarketing rules, national DNC list, recording consent	Compliance officer plus Canadian counsel
Australia	Do Not Call Register, Spam Act, ASIC financial services rules, recording consent by state	Compliance officer plus local counsel
Gulf states	TDRA or CITC telemarketing rules, local licensing for financial promotion, calling hours and language	Compliance officer plus local counsel
Other	Local telemarketing law, DNC registry, financial promotion rules, recording consent	—

6 Evidence you keep per call

When a trader or a regulator asks what was said, the answer should be a file, not a memory.

- ☐ **Store the recording and transcript with the script version, campaign ID and the trader's CRM ID attached.**

Topcalls includes recording and transcription in the per-minute rate, so the cost question doesn't arise. The tagging is what makes the file findable.

- ☐ **Log the timestamp at which the AI disclosure and the recording notice were played on each call.**

Pull it from the transcript automatically. A spot check of ten calls a week confirms it's happening.

- ☐ **Log every opt-out with the phrase used, the timestamp and the CRM write confirmation.**

If the CRM write fails, someone should know that day.

- ☐ **Set the retention period per jurisdiction with your compliance officer and configure deletion to match.**

Marketing recordings and MiFID II order records have different retention needs. Don't apply the longest one to everything by default.

- ☐ **Write down how a trader's access request is fulfilled: who pulls the recording, in what format, within what time.**

Run one test request end to end before launch.

- ☐ **Keep the consent record that justified the call next to the call record.**

Date, source and wording of the consent. The related list-data checklist covers how to build it.

7 Pre-launch sign-off

Nobody dials until every line below has a name and a date.

- ☐ **Confirm the compliance officer has listened to at least five test calls, including one opt-out and one "are you a robot?".**

Reviewed by: _____ on _____

- ☐ **Confirm the per-jurisdiction table above is complete for every country on the list.**

Countries covered: _____ of _____

- ☐ **Confirm the suppression list was refreshed within the window your compliance officer set.**

Last refresh: _____

- ☐ **Confirm the approved script version is the one loaded in the campaign.**

Version in campaign: _____

- ☐ **Name the person who can pause the campaign within minutes if a complaint comes in, and confirm they have access.**

Pause owner: _____

- ☐ **Schedule the first review of live-call samples for the day after launch, not the end of week one.**

First review date: _____

How to use this checklist

1. Print it and go through sections one to four with the person who wrote the agent's script. Fix wording as you go.
2. Hand section five to your compliance officer with the country breakdown of the calling list. Each row needs a named reviewer.
3. Run five test calls against the agent, including an opt-out and a "are you a robot?", and check them against sections one to three.
4. Complete section six with whoever owns the CRM and call storage. Test one access request and one opt-out loop end to end.
5. Fill in section seven. When every blank has a name and a date, the campaign can dial.

Book a 30-minute call with a Topcalls co-founder

We walk through your calling list by country, show how the agent's disclosure, recording and opt-out lines are configured, and scope a pilot your compliance officer can sign off.

topcalls.ai/book