

MATTERS DECIDED BY THE TRIBUNAL

Tribunal Sitting, Case Number and Date	Case Ref	Network Operator	Level 1 Provider	Level 2 Provider	Service Title and Type	Case Type	Procedure
No. 113 Case 1 8/11/12	10943	CFL Communications Limited	N/A	Red Play Media Limited	Direct call connection and information service	Level 2 Provider	Track 2 Procedure

Between 14 December 2011 and 16 August 2012, PhonepayPlus received 15 complaints from members of the public, regarding two call connection services (the “**Services**”) callerhelp.co.uk (“**Callerhelp**”) and phonenumber.co.uk (“**Phonenumber**”). The Services were operated by the Level 2 provider Red Play Media Limited on the premium rate number ranges 0901 226 0000-4000 and 0901 226 4001-7000. In addition the Level 2 provider operated a further website named numerosdetelephone.org (“**Numerosdetelephone**”).

The Services were promoted using sponsored search engine results, for example Google “AdWords” and Bing “Ads”. The search engine results led consumers to the Services’ landing pages, which contained promotional material for the premium rate call connection Services. Upon calling the premium rate number, consumers were provided with two options; to be directly connected to the organisation they required, or to stay on the line and hear a recorded message of the phone number of the organisation or company. After the recorded message, consumers were provided with a further opportunity to be connected directly. Calls were charged at £1.53 per minute.

The Services offered premium rates connection services to thousands of public organisations, including, NHS Direct, hospitals and welfare agencies, and private organisations including the AA, American Airlines, WH Smith and Wonga.com.

The complainants stated that the Services’ websites were misleading. Consumers reported that they had been misled into believing that the premium rate numbers were the numbers of the actual organisation or company they were trying to contact. The Executive considered that it was clear from a number of the complaints, that consumers who used the Services were vulnerable as a result of their circumstances. For example, they required medical or financial assistance. Executive monitoring of the Services supported the complainant’s accounts.

The Executive raised the following potential breaches of the PhonepayPlus Code of Practice (12th Edition) (the “**Code**”).

- Rule 2.3.2 – Misleading
- Rule 2.3.10 – Vulnerable groups
- Rule 2.2.5 – Pricing

The Tribunal upheld the breaches. The Level 2 provider’s revenue in relation to the Services was within the range of Band 4 (£50,000- £100,000). The Tribunal considered the case to be **serious** and imposed a formal reprimand, a fine of £50,000 and a requirement that the Level 2 provider must refund all complainants who claim a refund, for the full amount spent by them on the Services (including Numerosdetelephone), within 28 days of their claim, save where there is good cause to believe that such claims are not valid, and provide evidence to PhonepayPlus that such refunds have been made.

**THE CODE COMPLIANCE PANEL OF PHONEPAYPLUS
TRIBUNAL DECISION**

**Thursday 8 November 2012
TRIBUNAL SITTING No. 113/ CASE 1
CASE REFERENCE: 10943**

Level 2 provider: Red Play Media Limited
Type of service: Direct call connection and information service
Level 1 provider: N/A
Network operator: CFL Communications Limited

**THIS CASE WAS BROUGHT AGAINST THE LEVEL 2 PROVIDER
UNDER PARAGRAPH 4.4 OF THE CODE**

BACKGROUND

Between 14 December 2011 and 16 August 2012, PhonepayPlus received 15 complaints from members of the public, regarding two call connection services (the “**Services**”) callerhelp.co.uk (“**Callerhelp**”) and phonenumber.co.uk (“**Phonenumber**”). The Services were operated by the Level 2 provider Red Play Media Limited on the premium rate number ranges 0901 226 0000-4000 and 0901 226 4001-7000. In addition the Level 2 provider operated a further website named numerosdtelephone.org (“**Numerosdtelephone**”).

The Services were promoted using sponsored search engine results, for example Google “AdWords” and Bing “Ads” (**Appendix A**). The search engine results led consumers to the Services’ landing pages, which contained promotional material for the premium rate call connection and information services. Upon calling the premium rate number, consumers were provided with two options; to be directly connected to the organisation they required the number of, or to stay on the line and hear a recorded message of the phone number of the organisation. After the recorded message, consumers were provided with a further opportunity to be connected directly. Calls were charged at £1.53 per minute.

The Services offered premium rates connection services to thousands of public organisations, including NHS Direct, hospitals and welfare agencies, and private companies including the AA, American Airlines, WH Smith and Wonga.com (**Appendices B, C and D**).

The complainants stated that the Services’ websites were misleading. Consumers reported that they had been misled into believing that the premium rate numbers were the numbers of the actual organisation they were trying to contact. The Executive considered that it was clear from a number of the complaints, that consumers who used the Services were vulnerable as a result of their circumstances. For example, they required medical or financial assistance. Executive monitoring of the Services supported the complainant’s accounts.

The Level 2 provider was subject to eight Fast Track informal complaint resolution procedures between November 2011 and July 2012. During the Fast Track procedures, the provider was notified of concerns regarding pricing, misleading promotions and the potentially vulnerable circumstances of consumers.

The Services (including Numerosdetelephone) were voluntarily suspended by the Network operator on 10 September 2012. After the Level 2 provider had implemented compliance advice, including removing promotions for a number of connections to public organisations (such as NHS Direct), making the Level 2 provider's contact details more prominent and improving pricing, the Phonenumbers service was reactivated on 1 October 2012. On 1 October 2012, Executive monitoring identified non-compliant Bing "Ads" promotions. As a result, the Network operator voluntarily suspended the Phonenumbers service for a second time. The Bing "Ads" were made compliant and the Phonenumbers service was reactivated on 5 October 2012. The Callerhelp and Numerosdetelephone remained suspended throughout the entire duration of the investigation.

The Investigation

The Executive conducted this matter as a Track 2 procedure investigation in accordance with paragraph 4.4 of the PhonepayPlus Code of Practice (12th Edition) (the "**Code**").

The Executive sent a breach letter to the Level 2 provider on 17 October 2012. Within the breach letter the Executive raised the following potential breaches of the Code:

- Rule 2.3.2 – Misleading
- Rule 2.3.10 – Vulnerable groups
- Rule 2.2.5 – Pricing

The Level 2 provider responded on 31 October 2012. On 8 November 2012, and after hearing informal representations from the Level 2 provider, the Tribunal reached a decision on the breaches raised by the Executive.

SUBMISSIONS AND CONCLUSIONS

ALLEGED BREACH ONE

Rule 2.3.2

"Premium rate services must not mislead or be likely to mislead in any way."

1. The Executive submitted that the Level 2 provider had breached rule 2.3.2 for the reasons set out below.

Reason 1 (Callerhelp)

- i. The Executive noted that the cost of calling the premium rate number was not provided on the landing page. Consumers were instead provided with the following statements:

"Call charges to 0800 numbers are free from a landline, calls to 0870, 01 and 02 numbers and [sic] charged at standard landline rates (check with your telecoms provider), calls to 0871 numbers are charged at 10ppm. Also note that mobile operators may apply different fees, so please check with your mobile provider."

And,

"You may be able to find the above number on the companies [sic] website. This is the same number as we have listed above and we are not charging for this service – it is free of charge."

The Executive submitted that the above wording was very misleading as the numbers were not “free” to call and no pricing information for the actual premium rate number was given. In addition, the second paragraph was entirely misleading as the numbers listed on the landing page were premium rate call connection numbers that were only available on the Level 2 provider’s promotions. The Executive asserted that consumers were entitled to assume that the reference to “above number” was with respect to the premium rate number and not any other number that consumers could locate by clicking on the URL link. In addition, during monitoring the URL links did not work.

The Executive submitted that the statements were wholly misleading as consumers were led to believe that no cost was incurred by dialling the premium rate number. In reality, the cost to the consumer of calling the numbers was £1.53 per minute.

In addition, on the “Call Charges” landing page, the website contained lengthy details regarding charges for other free and non-geographical numbers. Many of the charges referred to were either expressed as “free” or low cost. The Executive believed that this section, in the absence of the actual cost of the premium rate number, implied that the charge to consumers for dialling the premium rate numbers were either low cost or free.

- ii. The Executive noted that promotions included a Google map showing the address of the company the consumer required followed by a phone number (**Appendix C and E**). However, instead of showing the actual number for the company or organisation, the map had been manipulated to show the premium rate connection number. In all other respects the map was identical to a genuine Google map, for example it contained Google’s logo. The Executive submitted that consumers were misled, or likely to have been misled, into the belief that the map was a genuine Google map and that the premium rate phone number given was the actual number for the company or organisation detailed.
- iii. Thirdly, the Callerhelp website did not contain a disclaimer stating that it was not affiliated with any of the companies or organisations that consumers required. The Executive submitted that, in the absence of a disclaimer, consumers were led to believe that the premium rate number displayed was the number of the company or organisation that they were attempting to contact.

Reason 2 (Phonenumber and Numerousdtelephone)

The websites for Phonenumber and Numerousdtelephone contained the following statement:

“We are not associated, nor affiliated with the company but act simply as a cost effective call connection service.”

The Executive submitted that the statement was misleading as calls costed £1.53 per minute, which was not “cost effective” when compared with the cost of a direct call to many of the advertised connection numbers. For example, direct calls to the RSPCA are charged at the standard geographic rate and calls to NHS Direct cost 5p per minute from a BT landline.

The Executive therefore asserted that the use of the words “cost effective” was misleading.

Reason 3 (Phonenumber)

The Executive noted that during the informal complaint resolution procedures, the Level 2 provider was instructed to ensure that its search engine “AdWord” and “Ads” promotions were not misleading.

On 1 October 2012, Executive monitoring of promotional material for Phonenumbers identified the use of misleading Bing “Ads”. The promotions were misleading as they did not make it clear that consumers would be directed to a third party connection service and not the direct number of the company or organisation that the consumer required.

The Executive accepted that some of the connection services promoted were not live as the Level 2 provider had stopped providing connection services to a large number of public and charitable organisations (for example the RSPCA and NHS Direct). However, the Executive noted that misleading promotions for commercial organisations, including American Airlines and the Gap, were live.

In light of the above reasons, the Executive submitted that the Level 2 provider had acted in breach of rule 2.3.2 of the Code.

2. The Level 2 provider responded to each allegation as set out below.

Reason 1 (Callerhelp)

- i. The Level 2 provider stated that misleading pricing on the website was a genuine human mistake which it regretted. The provider stated that the website was driven by a database and whilst in its development phase, to get the site performing correctly, the actual numbers of companies were used (and not premium rate numbers). When the website was fully developed, premium rate numbers were added. The provider stated that, the website was initially compliant but that, unfortunately, the pricing was changed “back” by a member of their development team when the website was updated. In addition, the provider asserted that it had updated its process and system to link the premium rate number to the pricing text within its database thus ensuring that the error cannot be repeated in future. The Level 2 provider also stated that the Interactive Voice Response (“IVR”) contained the correct pricing information, which demonstrated that there was no intention to deceive. Further, the provider stated it was happy to refund customers and that it had provided the URL link to companies’ websites, which allowed consumers to find the required number for free.
- ii. The Level 2 provider stated that the Google map was not manipulated to “con” the public and that the Executive was shown other sites with the same type of map and premium rate number lay out. The Level 2 provider submitted that, when the correct pricing is displayed, it is clear that the number is a premium rate number to call a directory service and not the actual company’s number. Further, it was asserted that it was clear that a directory service was being promoted on the landing pages and not the website of the actual company with the actual company’s number.
- iii. The Level 2 provider stated that the Callerhelp website had always contained a disclaimer stating that the website was not affiliated or connected with the organisations the consumer was trying to contact.

Reason 2 (Phonenumber)

The Level 2 provider asserted that the Phonenumbers service was clearly advertised as a directory service. The provider stated that it was correct and accurate to

describe the service as “cost effective” in comparison to other more expensive directory services which operate on the 118 number designation. Therefore, it submitted that the description “cost effective” was not misleading. The provider added that it was of the view that PhonepayPlus had confirmed that the landing page was compliant and that it had worked with the Executive to remove any organisation or company from its database that could have potentially resulted in consumer harm.

Reason 3 (Phonenumber)

The Level 2 provider stated that it voluntarily suspended its advertisements and websites upon receiving the initial email/documentation from PhonepayPlus on 6 September 2012. After an exchange of emails, many phone calls and the removal of many companies and organisations from the website (even though it was pointed out to the Executive that many other companies were still advertising these organisations), it was finally agreed that the website phonenumber.co.uk and associated advertising could be resumed. The provider accepted that the Google “AdWords” and Bing “Ads” promotions were potentially misleading and stated that, unfortunately, some of the adverts that had been suspended previously got turned back on within Google and Bing. The Provider asserted that the many of the links on the “Ads” and “AdWords” were not live (i.e. the RSPCA “Ads”). However, during informal representations, the provider accepted that some of the “Ads” were live for a few hours and contained live links to premium rate numbers (for example, premium rate call connection to American Airlines and the Gap). The provider added that when it was told that the Bing “Ads” were live, it immediately voluntarily suspended the Phonenumber service again.

3. The Tribunal considered the evidence, including the written and oral submissions made by the Level 2 provider.

In regard to the Callerhelp service, the Tribunal concluded that the wording in relation to the cost of calls was wrong and clearly misleading and noted that this was accepted by the Level 2 provider. The Tribunal was particularly concerned by the use of a manipulated Google Map as a consumer would not know that the map had been altered and be highly likely to have thought that the numbers given were the actual numbers for the company or organisation that they wished to contact. In addition, the Tribunal held that the absence of a disclaimer was likely to have added to the misleading nature of the promotion.

The Tribunal noted the Executive’s submissions regarding the description of some services as “cost effective”. The Tribunal noted that the use of the term was ambiguous as it was not clear what the service was allegedly “cost effective” in relation to. In addition, the Tribunal was concerned by the use of the term in connection to a premium rate service charged at £1.53 per minute. However, the term was preceded by wording that directed that the information was available for “free” elsewhere and followed by pricing information, in all the circumstances and on the specific facts presented, the Tribunal concluded - on a narrow balance of probabilities - the use of wording was not in breach of rule 2.3.2.

The Tribunal noted that the Level 2 provider accepted that promotional material for live premium rate services was unintentionally promoted on Bing “Ads” for a short time period on 1 October. In addition, the Tribunal noted that the Executive accepted that the promotions which promoted live premium rate services were limited to commercial organisations (and not services that may have attracted people in vulnerable circumstances). The Tribunal held that the content of the “Ads” was misleading as it was not clear that the promotions were for a call connection and

information service. Consequently, the Tribunal concluded that consumers had been misled, or were likely to have been misled, by the promotions.

Accordingly, the Tribunal upheld a breach of rule 2.3.2 of the Code for the reasons detailed above.

Decision: UPHELD

ALLEGED BREACH TWO

Rule 2.3.10

“Premium rate services must not seek to take advantage of any vulnerable group or any vulnerability caused to consumers by their personal circumstances.”

1. The Executive submitted that the Services sought to take advantage of members of the public who were vulnerable due to their circumstances, including their need for medical advice, immediate assistance, or advice about an existing vulnerability.

The Executive noted that the Services’ websites listed over two thousand organisations or companies for whom premium rate numbers had been allocated for consumers to call. Examples of the companies or services detailed were, NHS Direct, Child Benefit, HMRC Bereavement Helpline, hospitals and hospital departments such as accident and emergency, intensive care and special baby care units, the AA (Automobile Association) breakdown service and other such companies, payday loan companies such as Wonga.com, lost and stolen departments for banks and building societies, British Gas Emergencies, Child Support Agency, Disability Living Allowance, Job Centre Plus, Jobseeker Direct, Travel Insurance Medical Assistance, Education Maintenance Allowance.

The Executive asserted that a significant number (or the main group) of consumers wishing to contact the above organisations had vulnerable personal circumstances caused by their need to seek, for example, urgent medical advice, immediate financial assistance, or by their need to seek advice about any other more specific vulnerable personal circumstances, including, urgent breakdown recovery or lost credit debit/cards.

The Executive noted that a number of the complainants specifically documented that the Services had taken advantage of their vulnerable circumstances, for example, their ill health or low income.

The Executive submitted that the Level 2 provider would have been aware when commencing the Services, and was subsequently made aware during Fast Track procedures, that both potential and actual consumers could be from a vulnerable group or be vulnerable as a result of their personal circumstances. However, the Level 2 provider continued to operate the Services and to take advantage of such vulnerability. By way of example, on 22 May 2012, the Complaint Resolution team drew the provider’s attention to a Compliance Update that stated:

“The Guidance has outlined some of the concerns regarding services that may be attractive to consumers who are in vulnerable circumstances. We would strongly advise removing all such services to ensure that paragraph 2.3.10 of the Code is not breached. Other services to look out for include employment benefits, medical advice and Government crisis loans.”

As a result of the above, the Executive submitted that the Services sought to take

advantage of members of the public who were vulnerable due to their personal circumstances, including but not limited to their need for medical advice, immediate assistance, or advice about an existing vulnerability, in breach of rule 2.3.10 of the Code.

2. The Level 2 provider stated that the following organisations were either not advertised at all or removed in line with PhonepayPlus compliance advice (which it asserted had changed during the course of operation of the Services):

- NHS Direct
- Child Benefit
- HMRC Bereavement Helpline
- Hospitals and Hospital Departments etc.
- Payday Loans and Payday Loan Companies
- Lost and Stolen Departments
- British Gas Emergency
- Child Support Agency
- Disability Living Allowance
- Jobseeker Direct
- Job Centre Plus
- Travel Insurance Medical Assistance
- Education Maintenance Allowance

The Level 2 provider stated that all 118 directory enquiry companies offer a service to these organisations and will give the number and connect consumers to these organisations at a higher cost than the Services' cost. The provider added that it did not understand the difference between these organisations being on its website and the 118 providers being able to offer a directory service for these organisations. The Level 2 provider denied that it had targeted vulnerable people at any point.

In relation to the numerosdetelephone.org, the Level 2 provider stated that it was intended for the Spanish market using Spanish premium rate number. However, a copy of the callerhelp.co.uk website was loaded onto the webhosting (which contained the correct pricing information) but at no point was this website advertised or promoted in the UK as it was going to be aimed at the Spanish market with Spanish PRS numbers (although the website was live).

3. The Tribunal considered the evidence and noted the Level 2 provider's submissions. In particular, the Tribunal noted that, following advice, the Level 2 provider had ceased promoting the connection service to a number of organisations and services. The Tribunal concluded that members of the public who required the services of the public organisations and services, such as NHS Direct, were likely to be vulnerable due to their personal circumstances. For the reasons submitted by the Executive, the Tribunal held that the Services and its promotion operated in a manner that took advantage of vulnerabilities caused to consumers by their personal circumstances. Accordingly, the Tribunal upheld a breach of rule 2.3.10 of the Code.

Decision: UPHELD

ALLEGED BREACH THREE

Rule 2.2.5

"In the course of any promotion of a premium rate service, written or spoken or in any medium, the cost must be included before any purchase is made and must be prominent,

clearly legible, visible and proximate to the premium rate telephone number, shortcode or other means of access to the service.”

1. The Executive noted that on the Callerhelp website a connection service to 2,153 organisations and companies was promoted. Each organisation or company promoted had its own dedicated webpage and allocated premium rate number. The Executive’s monitoring found that no pricing was provided alongside any of the premium rate numbers. The Executive searched the Callerhelp website and found the following pricing information within the “About Us” page:

“All calls from BT landlines are competitively charged at only £1.53 per call.”

The Executive asserted that the actual cost of calling the premium rate numbers was £1.53 per minute (not per call), and therefore this cost information was factually incorrect and neither prominent, nor proximate, to any of the premium rate numbers listed on the website.

Therefore, the Executive submitted that consumers were not provided with the cost of calling the premium rate numbers in breach of rule 2.2.5 of the Code.

2. The Level 2 provider accepted that the pricing information on the Callerhelp website was wrong and not proximate to the premium rate numbers. The provider asserted that the “mis-pricing” on the website was a genuine and unintentional human mistake.

During informal representations, the Level 2 provider stated that when the website was launched it contained the correct pricing information. However, when changes were made as a result of the implementation of new Google compliance measures, the wrong database was uploaded, which resulted in the breach. The provider stated that as a result of personal circumstances, the appropriate compliance checks had not been carried out. However, the provider stated that going forward all promotions would be checked by a Director of the company before going live.

3. The Tribunal considered the evidence, including the written and oral submissions made by the Level 2 provider. The Tribunal noted that the breach was admitted by the Level 2 provider and therefore upheld a breach of rule 2.2.5 of the Code for the reason detailed by the Executive.

Decision: UPHELD

SANCTIONS

Initial Overall Assessment

The Tribunal’s initial assessment of the breaches of the Code was as follows:

Rule 2.3.2 – Misleading

The initial assessment of rule 2.3.2 of the Code was **serious**. In determining the initial assessment for this breach of the Code the Tribunal applied the following criterion:

- The Service generated substantial revenues through recklessly non-compliant promotional material that misled consumers.

Rule 2.3.10 – Transparency

The initial assessment of rule 2.3.10 of the Code was **serious**. In determining the initial assessment for this breach of the Code the Tribunal applied the following criteria:

- The case had a clear detrimental impact, directly or indirectly, on consumers and the breach had a clear and damaging impact on consumers.
- The nature of the breach meant that the Service damaged consumer confidence in premium rate services.

Rule 2.2.5 –Pricing

The initial assessment of rule 2.2.5 of the Code was **serious**. In determining the initial assessment for this breach of the Code the Tribunal applied the following criterion:

- The Service generated substantial revenues through recklessly non-compliant promotional material that misled consumers.

The Tribunal's initial assessment was that, overall, the breaches taken together were **serious**.

Final Overall Assessment

The Tribunal took into consideration the following aggravating factors:

- The Level 2 provider failed to follow Guidance in relation to pricing and promotional material and a Compliance Update in relation to information services.
- The breach of rule 2.3.2 continued after the provider became aware of it in relation to misleading sponsored search engine results (albeit for a short time period).

The Tribunal noted that the Level 2 provider had received compliance advice during the eight Fast Track informal complaint resolution procedures. The Tribunal noted that the provider had taken some steps to implement the compliance advice; however, the advice had not been fully implemented in relation to concerns regarding vulnerability and misleading sponsored search engine results. In the specific circumstances of the case, the Tribunal considered this failure to fully implement the advice was not an aggravating factor, but neither could it be considered as a mitigating factor as argued by the Level 2 Provider.

The Tribunal took into consideration the following mitigating factors:

- The Level 2 provider asserted that it had fully refunded 16 consumers.
- The Level 2 provider took action to correct information on one of its websites and asserted that it had implemented a new internal compliance procedure.
- All of the breaches did not apply across all three websites.

The Tribunal noted that following advice from third parties, the Level 2 provider had ceased providing call connection to a number of organisations (where there was a particular risk of taking advantage of vulnerable groups). However, in all the circumstances, the Tribunal did not accept that this was sufficient to be considered a mitigating factor because it had continued to provide call connection to other services or organisations which the Tribunal had found still took advantage of consumer's vulnerabilities.

The Level 2 provider's revenue in relation to the Service was at the high end of Band 4 (£50,000- £100,000).

Having taken into account all the circumstances of the case, including the aggravating and mitigating factors, the Tribunal concluded that the seriousness of the case should be regarded overall as **serious**.

Sanctions Imposed

Having regard to all the circumstances of the case, the Tribunal decided to impose the following sanctions:

- A formal reprimand;
- A fine of £50,000; and
- A requirement that the Level 2 provider must refund all complainants who claim a refund, for the full amount spent by them on the Services (Callerhelp, Phonenummer and Numerosdetelephone), within 28 days of their claim, save where there is good cause to believe that such claims are not valid, and provide evidence to PhonepayPlus that such refunds have been made.

Appendices

Appendix A: Screenshot of a Google “AdWords” promotion for phonenumbers.co.uk viewed on 28 February 2012:

The screenshot shows a Google search for "NHS DIRECT CONTACT". The search results include three AdWords from phonenumbers.co.uk:

- NHS Direct Contact Number - Call our quick directory service**
nhsdirect.medhelpline.co.uk/
We offer a call connection service.
- NHS Direct Phone Number - Need to call NHS Direct?**
nhsdirect.fastphonenumber.co.uk/
Use our quick directory service.
- Calling NHS Direct? | phonenumbers.co.uk**
www.phonenumber.co.uk/NHSDirect
Use Our Quick Directory Service To Find Numbers They Hide! Call Now

Appendix B: Screenshot of a live promotion for a premium rate connection service to NHS Direct:

The screenshot shows a live promotion for a premium rate connection service to NHS Direct. The page features the "Phone Number" logo and the text "Call our directory service Number also sent by text message to mobile phones". The main heading is "NHS DIRECT" and the phone number "0901 226 1789" is prominently displayed. A woman wearing a headset is shown on the right side of the page. The text states: "The information provided is also available free of charge from other sources on the internet such as [this url](#)".

Below the main content, there are sections for "Important Information" and "Comments". The "Important Information" section states: "You must be over 18 to use this service. We must inform you that Phonenumbers.co.uk is completely independent from any of the companies or organisations that may have their phone numbers featured on this web site. Red Play Media Ltd operate all the phone numbers shown on this web site." The "Comments" section says: "To make a comment or suggestion about our Phonenumbers.co.uk service please use the contact us page."

At the bottom of the page, there is a "More Information" section with links to "About Us", "Terms of Use", "Privacy Policy", "Contact Us", and "Site Map".

Appendix C: Screenshot of a live promotion for a premium rate connection service to the RSPCA on callerhelp.co.uk



Appendix D: Screenshot of a live promotion for a premium rate connection service to “Child Benefit” on numerousdtelephone.org:



Appendix E: Screenshot of a manipulated Google map:



