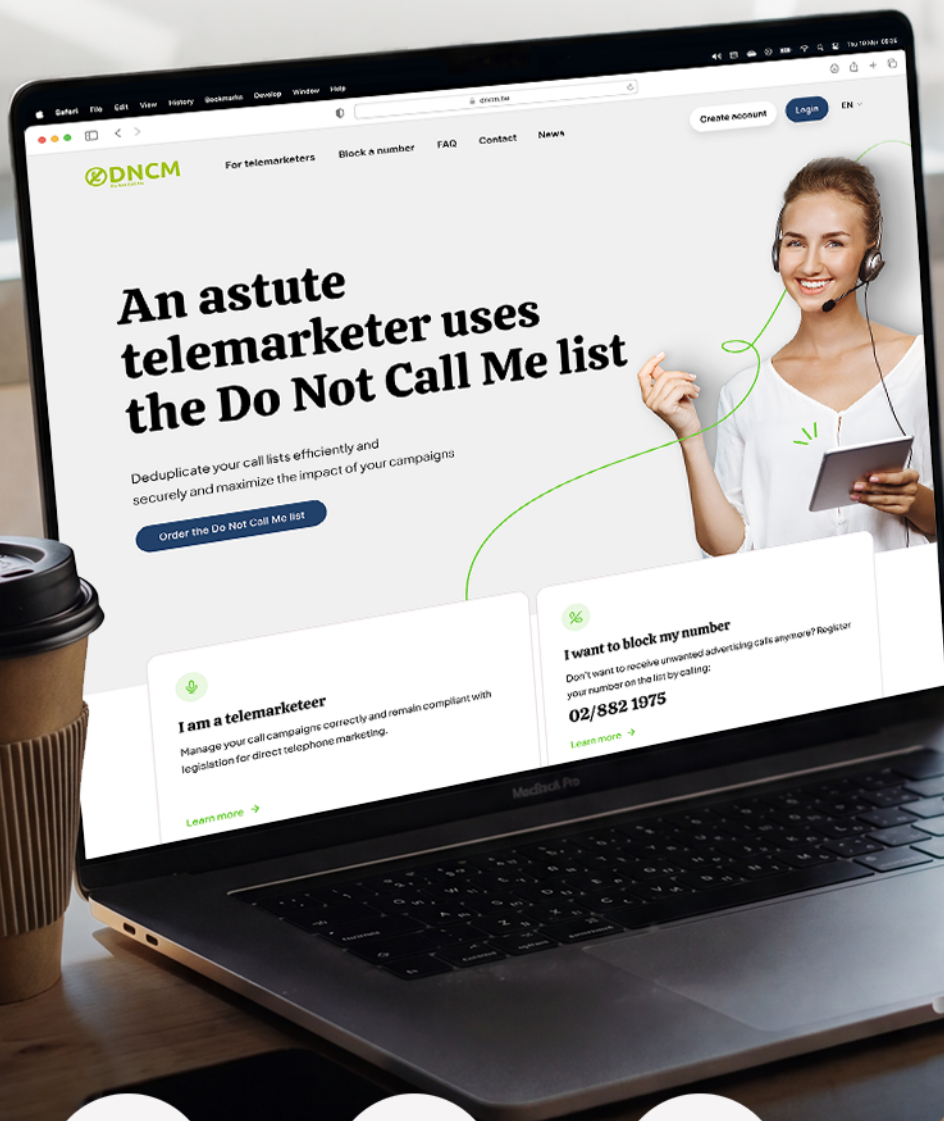


WHITEPAPER #3

Telemarketing without risk



More results



Compliance proof



GDPR Conform



Case study: MEGA Energy

DNCM
Do Not Call Me

Introduction

The same questions keep coming up among telemarketing companies: how exactly does this list work? Who is liable—the advertiser or the call center? And what if your call center is located in Morocco or Turkey?

This whitepaper provides straightforward answers. Not a legal textbook, but a practical guide for anyone organizing or conducting outbound campaigns in Belgium. Featuring a real-life case study of MEGA, an energy company that worked with Do Not Call Me VZW to refine its existing charter and strengthen its compliance framework.

Why compliance matters more than ever

Telemarketing is changing rapidly. Whereas the focus used to be on volume, outbound marketing is now evolving toward highly segmented and data-driven campaigns.

CRM integrations, AI-driven tools, and intelligent dialers that predict the optimal calling time, prioritize leads and dynamically distribute calls, make it possible to work in a more targeted and effective way. The core principle remains unchanged: **not calling more, but calling better**—while technology enables this principle to be applied on a larger scale and with greater consistency. In this context, compliance is no longer merely a prerequisite but an integral part of the process.

At the same time, public sensitivity to unwanted calls continues to grow. Consumers are less tolerant, more critical, and expect transparency.

Although Europe still allows the opt-out system, regulatory pressure toward an opt-in model is increasing. In that context, compliance with Belgian legislation – and therefore respecting the Do Not Call Me list, is a strategic necessity rather than a luxury.

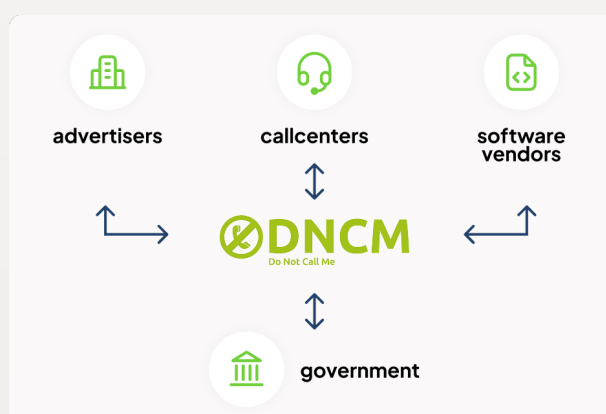
 **Burt Riské — Managing Director DNCM VZW**

Those who fail to invest today will pay a high price tomorrow—both financially and in terms of reputation. Within this landscape, the Do Not

Call Me list is a mandatory point of reference. Any telephone number registered on this list may not be contacted for marketing purposes, unless the subscriber has explicitly given consent after registering. This obligation applies to both advertisers and call centers, and it also applies when calls are made from Paris, Amsterdam, Marrakesh, or Istanbul.

The DNCM ecosystem: who is who?

Do Not Call Me VZW is the officially recognized organization managing the Do Not Call Me list. It makes the list available to licensed users (under strict conditions), monitors its usage, and acts in cases of misuse.



DNCM VZW is more than just a data source: it is the compliance hub connecting advertisers, call centers, software providers and government authorities.

Who bears responsibility?

A persistent misconception: companies believe liability lies entirely with the call center, while call centers believe it lies with the company. That is not the case. Both the advertiser (client) and the call center (executor) bear legal responsibility. Both parties must hold a license, enabling them to verify any phone number before making a call.

The list you download has a “validity period”: a new update is published online every day. The same file may be used for a maximum of five working days. We recommend deduplicating your calling lists daily, or at least every three days. Both parties may be subject to sanctions.

An international ecosystem

Nearly 80% of license holders who have ever purchased a license from DNCM VZW are based in Belgium. One in five calls originates from abroad targeting Belgian consumers: the Netherlands (8.74%), France (5.14%), but also Turkey, Morocco, Bulgaria, and even Australia and the United States.

Telemarketing does not stop at the border.

Neither does the law.

Type of license holder

64%



Advertiser

35%



Agency
(Callcenter, Data)

2%



Non-profit
organisation

Sector	%
Banking & Insurance	14%
Energy	10%
Telecom	10%
Software	7%
Consultancy	5%
Online retail	5%
Marketing	5%
ICT	4%
Media	3%
Deco	3%

Working with the Do Not Call Me list

Every license holder has access to the most up-to-date version of the list. It can be downloaded manually, retrieved via SFTP, or integrated directly via API into your CRM.

But access is only the beginning..

The golden rules

- A license is unique and linked to your company registration number; it is non-transferable and cannot be shared
- Access to the DNCM platform is protected by 2FA (Google Authenticator); logins cannot be shared
- Each entity has its own license and pricing plan: advertiser, service provider (call center/ data processor) and non-profit organization
- Working with a foreign call center, data broker or intermediary? Request a copy of the DNCM invoice with an active license period or contact DNCM VZW in case of doubt
- Download the list at least every 3 working days; the legal grace period is 5 working days
- Keep proof that your file has been screened in a log or report
- Filter every calling list before the start of a campaign and retain proof (date, version, campaign name)

What must be demonstrated during an audit?

1. Proof of an active license

2. Evidence of calling list cleansing

- Which calling lists were used (client, campaign, segmentation, date received)
- Date and time the list was filtered
- Against which version of the Do Not Call Me list
- Number of removed entries

3. Audit trail / internal logging

CRM logs or dialer system logs showing:

- that the Do Not Call Me list was applied
- that numbers on the Do Not Call Me list are not called or are blocked

4. Contractual obligation

The client (the company commissioning the campaign) must be able to demonstrate contractually that the call center is required to use the list and that compliance checks are possible

How DNCM VZW performs checks

DNCM VZW does not only operate reactively. Every new license holder undergoes a dual screening process: an administrative verification and a direct contact moment. In the case of call centers, the relationship with the client is also verified.

When DNCM VZW receives a complaint about an unwanted call, the process follows a structured sequence. First, it is verified whether the complaint qualifies as an unwanted call (i.e. whether the reporting number is registered on the list). If the company can be identified and the call is indeed non-compliant, DNCM VZW checks whether the company holds a valid license.

The company is then contacted not for punitive purposes, but for information and clarification. The objective is dialogue and awareness. Companies generally appreciate this approach. If a company holds a license, the question becomes why it was not correctly applied. If a company does not hold a license, the applicable rules are explained and the company is encouraged to become compliant.

Only in cases of persistent violations or refusal to cooperate is the matter escalated to the Federal Public Service Economy. The FPS Economy may then issue a warning or impose an administrative fine.

Case study: an unwanted call involving MEGA Energy

MEGA is a Belgian energy and telecom player based in Liège that acquires customers via telephone marketing. The company holds an active Do Not Call Me license and works with external call centers for prospecting, which receive a filtered calling list on a monthly basis.

For cooperation with foreign partners, MEGA works with a broker and contractual obligations regarding the use of the Do Not Call Me list. Everything appeared to be in order.

What went wrong?

A report about an unwanted call was submitted to DNCM VZW. This resulted in extensive and constructive email correspondence with Romina Locascio, Sales Manager at MEGA.

It emerged that one call center had used the monthly calling list beyond the permitted validity period. As there was uncertainty regarding whether foreign call centers were required to hold a license, MEGA adopted the following approach: the calling lists used were screened in advance, notably through lead providers or other principals, in order to exclude consumers who were registered on an opt-out list.

MEGA's response

MEGA responded immediately in a highly professional and proactive manner:

In the context of our obligations as a DNCM license holder, we take this report very seriously and have immediately initiated the necessary internal checks.

 Romina Locascio — Sales Manager MEGA

Using the caller ID and internal logging system, MEGA was able to quickly identify the responsible call center, which was subsequently deactivated. Romina asked many questions and together the parties reviewed the contractual conditions imposed on external partners authorized to call on

behalf of MEGA. These requirements were already extensive, but not fully watertight.

There was open communication regarding the various external call centers, and DNCM VZW was able to verify whether MEGA's partners held valid licenses. DNCM VZW systematically asks every newly registered call center on the platform to indicate for which client they are working.

We were not aware that foreign companies could also obtain a license. We believed that a license was only accessible to Belgian companies. In this context, the involved call centers were provided with pre-filtered calling lists. In addition, we were also not aware that a license holder could verify with DNCM VZW whether a contracted call center holds a valid license.

 Romina Locascio — Sales Manager MEGA



The responsibility for compliance with the Do Not Call Me list is a shared responsibility between advertiser and call center. DNCM VZW does not recommend call centers, but it can verify whether a call center holds a valid license, ensuring that license holders avoid unnecessary risks.

What has changed?

MEGA has added a crucial requirement to its charter and is enforcing this not only with future partners, but also with its existing call centers. Romina has personally contacted all current providers:

From now on, every call center must be able to present a copy of the Do Not Call Me invoice showing an active license period. No document, no calls for MEGA.

“ Romina Locascio — Sales Manager MEGA

In addition, MEGA had already decided to impose the use of a call tool selected by MEGA on all new call centers wishing to work with us. The primary purpose of this measure is to ensure that the DNCM list is correctly and daily filtered. In a second phase, this requirement will be extended to all call centers currently active for MEGA. The filtering process will be automated and applied to all data files imported by call centers.

Government authorities cannot always compel foreign call centers to comply with Belgian legislation. However, the client can. With the right contractual conditions—and the right knowledge—compliance is no longer a burden. It becomes a standard that raises quality.

Curious about the full story? MEGA's perspective on telemarketing, their experience with DNCM VZW, and the reaction of their partners? Read the full case [here](#).



Mythbusters

The most common misconceptions about the list

#1 'A one-time download is enough'

The list changes every day. Companies that download it once and continue using the same version for weeks risk calling people who have registered in the meantime.. Download the list at least every three working days.

#2 'Our call center handles it, so we as advertisers are not liable'

Both the advertiser and the call center are legally responsible. Both require a license. Both can be sanctioned. Clear contractual rules are essential: no license = no work, maximum use of the same calling file for three working days, maintain a cleansing log, etc.

#3 'Foreign call centers are not subject to Belgian law'

Incorrect. The question is not where you are calling from, but whether you are calling Belgian numbers. Advertisers and call centers from France, the Netherlands, Morocco, or Turkey all benefit from respecting the Do Not Call Me regulations and obtaining a DNCM license. When traveling abroad, you also respect the laws of the country you are in—telemarketing is no different.

#4 'We have opt-in consent, so we can call'

Not always. Consent is valid only if it was given after registration on the Do Not Call Me list. If consent predates the registration, calling is not allowed. Always retain the date of consent. And how do you verify this? Exactly—by consulting the Do Not Call Me list.

Follow us on LinkedIn

<http://linkedin.com/company/dncm/>

Conclusion: compliance is your strongest argument

In telemarketing, compliance is often seen as a legal obligation—something to tick off in order to avoid fines. In reality, it goes much further than that.

Compliance is a strategic advantage. Companies that properly structure their processes—with clear contractual obligations, partner verification, and license monitoring—protect themselves against errors they do not directly control, but for which they may still be held partially responsible.

The Do Not Call Me list is not a restriction on commercial activity, but a framework that builds trust in telemarketing as a channel.

DNCM VZW manages the Do Not Call Me list, but does more than that: we support companies in making telemarketing more respectful and higher quality. We do this through tools and checklists, whitepapers such as this one, and above all through close, constructive dialogue with our license holders, government authorities, and consumers.

Do you dare to look in the mirror?

Do you work for a telemarketing company that walks the talk?

Are you the professional that:

- ✓ knows exactly who he may call thanks to the Do Not Call Me list?
- ✓ accepts a 'no' respectfully?
- ✓ exclusively works with clean, correct lists?
- ✓ bases him- or herself on data and respect.



Calling respectfully starts with the **Do Not Call Me list**.
Go to dncm.be for all market insights and rules.