

Before your sales AI sends

Channel rules, records and opt-outs for outreach to the US, the UK, France and Germany. Checked on 15 October 2026. Not legal advice.

Channel	United States	Europe
Cold email to a company	Allowed under CAN-SPAM: honest sender and subject, marked as an ad, postal address, opt-out honored within 10 business days	Depends on the country: UK allowed to limited companies; France if related to the recipient's job; Germany prior consent (§7 UWG). Individuals: consent
Email to existing customers	Allowed under CAN-SPAM rules	Own similar products, opt-out offered at collection and in every message (ePrivacy Art. 13(2))
Call in an AI voice	Prior express written consent, signed, naming the number (FCC ruling 8 Feb 2024; 47 CFR 64.1200); name your business at the start	Consent from individuals; UK and Germany also from businesses; France: professionals may object
Call by a person	Do Not Call Registry protects residential lines	UK: screen TPS and CTPS. Germany: at least presumed consent
LinkedIn	Person sends; no bots or scraping (User Agreement 8.2, 3 Nov 2025). California: bots that sell must say they are bots	Person sends; a promotional first message may count as electronic mail

Records to keep

1. Country and source of every contact, and the date
2. Consent (date, wording, channel, signature where required) or the purchase that makes them a customer
3. Copy of each message: date, channel, who approved
4. German consumer phone consent: five years (§7a UWG)

Opt-outs, information and disclosure

1. One suppression list checked by every sending system before each send
2. "Stop" by any channel counts; cancel scheduled sequences at once (US deadline: 10 business days; EU: GDPR Art. 21)
3. EU/UK data not collected from the person: tell them with the first message, within one month at the latest (GDPR Art. 14)
4. AI talking to people directly in the EU: say it is an AI (AI Act Art. 50, from 2 Aug 2026)

Why: CAN-SPAM penalties up to \$53,088 per email (FTC); TCPA \$500 per call, up to \$1,500 if willful; UK PECR fines up to £17.5m or 4% of turnover (ICO); BBVA fined €5,508,000 in Italy when a recorded objection never reached its marketing system.