



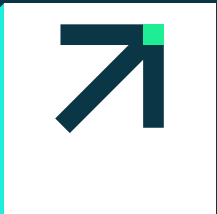
The Governed Offer: How Financial Services Marketing **Grows Up**

Why the future of personalized financial offers demands a purpose-built data model—and why Naeahas has already built it.





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Executive Summary

Financial services marketing sits at the intersection of the most powerful force in modern commerce—personalization—and the most complex constraint in any industry—regulation. Yet today, the vast majority of banks, credit unions, and brokerage firms manage their marketing offers through a patchwork of spreadsheets, tribal knowledge, and manual review cycles that cannot scale.

The result is a paradox: the very institutions that hold the richest customer data and the deepest product portfolios are among the slowest to bring relevant, personalized offers to market. When a top-tier bank needs 120 days to launch a rate change, or when marketing teams perform 30–70 manual compliance reviews per month, growth is not being constrained by ambition—it is being constrained by architecture.

This white paper introduces a new paradigm: the Naehas Standard Data Model. Developed through years of engagement with leading U.S. financial institutions, the model treats offers not as one-time campaign artifacts, but as versioned, auditable, reusable bank assets engineered from the ground up for the regulatory, operational, and personalization demands of modern financial services.

The model is built around six distinct Business Objects (BOs): Campaign, Product, Base Offer, Variant Offer, Eligibility, and Payout. Payout is further split into four purpose-built, typed objects—Reward, Interest, Fee Waiver, and Benefit—each engineered for the specific accounting treatment, calculation logic, and regulatory disclosure requirements of its reward category.

The Campaign sits at the top of the hierarchy, determining which Products are in scope and setting the guardrails for defining Base Offers. Base Offers, in turn, act as the governing framework for Variant Offers, where qualifying activities, incentive tiers, and review windows are concretely specified. Eligibility may be governed as a standalone, independently managed entity or defined directly within the Variant Offer, giving institutions the flexibility to match the model to their operational maturity.

By decomposing what legacy systems collapse into a monolithic “offer record,” institutions gain modularity, reusability, governance traceability, and the ability to scale personalization without scaling risk.

Offers are not campaign documents. They are governed bank assets. The institutions that understand this distinction will outpace those that do not.

This paper examines why the financial services industry needs this model, what it looks like in practice, and how Naehas has operationalized it into a platform that delivers measurable competitive outcomes for its clients.



01

The Crisis Nobody Talks About

The Hidden Cost of Offer Complexity in Financial Services

Every year, financial institutions invest billions of dollars in customer acquisition, retention, and cross-sell marketing. Credit card welcome bonuses. Deposit account rate promotions. Brokerage cash bonuses. Referral programs. Balance transfer offers. The category is vast, the spend is enormous, and the regulatory exposure is very real.

Yet the infrastructure supporting this spend at most institutions is, candidly, inadequate. Consider the operational reality that marketing and compliance teams face daily:

The Symptom	The Business Impact
2–4 weeks to launch a rate change	Competitors respond faster; market windows are missed
50+ approvals for product variants	Decision fatigue and bottlenecks stall campaigns
30–70 manual compliance reviews per month	Skilled analysts do clerical work at scale
16 hours of manual compliance work per document	Content launches delayed, not by creativity, but by process
60–80% of compliance review time on disclosure changes	A back-office function consumes front-office momentum
Offers stored in spreadsheets and SharePoint	No single source of truth; version control is fiction
Proving “what was shown to whom, when” requires days of work	Regulatory examination becomes an operational crisis

The regulatory stakes compound the operational problem. The SEC collected \$8.2 billion in penalties in FY2024 alone. Global fines surged 417% in the first half of 2025 compared to the same period in 2024. Major institutions have been fined between \$19 million and \$187 million for inadequate conflict-of-interest disclosures, with some required to engage independent compliance auditors.

The financial industry is not suffering from a lack of marketing ambition. It is suffering from a fundamental mismatch between the complexity of modern offer strategy and the architecture used to manage it.

The root cause is architectural. Banks do not have an offer data problem. They have an offer structure problem. Offer logic—who qualifies, what they must do, what they receive, and how it is paid—is collapsed into unstructured, document-based, non-interoperable artifacts that cannot be governed, cannot be reused, and cannot scale.



02

The Architecture of the Governed Offer

Why Offer Logic Requires Its Own Data Model

The foundational insight behind the Naehas approach is deceptively simple: an offer is not a document. It is a structured relationship between a campaign strategy, a regulated product, a customer eligibility definition, a set of behavioral requirements, and a financial commitment, each of which has its own governance requirements, reuse potential, and lifecycle.

When these dimensions are embedded in a flat “offer record” or a campaign brief, the institution loses the ability to govern them independently. A change to an eligibility rule triggers a full offer reapproval, even when the incentive amount has not changed. A payout structure used across forty offers cannot be updated in one place. A qualifying activity window that needs adjustment requires manual coordination across legal, marketing, and operations.

The solution is decomposition plus hierarchy. The Naehas Standard Data Model separates offer logic into six discrete Business Objects, organized in a deliberate governance cascade: Campaign → Product → Base Offer → Variant Offer, with Eligibility and Payout serving as governed, reusable components that plug into the hierarchy at the appropriate level. Each BO is independently governed, versioned, and reusable. This is not merely an organizational preference—it is an architectural prerequisite for scale.

The Six Business Objects of the Naehas Standard Data Model

Business Object	Purpose	Key Governance Attributes
Campaign	Sets the strategic context and guardrails for the entire offer program. Defines which Products are in scope, channel permissions, audience boundaries, line of business, budget, and the approved set of Base Offers. Nothing below it can operate outside its boundaries.	Opportunity type, line of business, eligible products (guardrail), channel presentment and enrollment categories, targeted audience segments, campaign start/end dates, funding source, linked Base Offers



Product	Defines the regulated product being offered: its type, sub-type, legal name, base rates and fees, currency, available geographies, supported languages, and eligible customer types. Acts as a product-level guardrail that downstream BOs cannot contradict.	Product type and sub-type, Product legal entity name, base rate and annual fee, product currency, available countries and provinces, supported languages, eligible customer types, product disclosure copy code
Base Offer	The canonical offer definition: intent, type, sub-type, reward dependency, global enrollment and redemption caps, stacking policy, fraud risk classification, and the approved universe of Eligibility and Payout BOs available to Variant Offers. Acts as the guardrail for all variants beneath it.	Base offer type and sub-type, reward dependency, stacking policy code, fraud risk level, max concurrent enrollments, redemption frequency and maximum, offer expiration and cancellation policy, terms and conditions, linked Eligibility BOs, linked Payout BOs
Variant Offer	The execution-level object. Inherits all Base Offer governance, selects active Products and Eligibility, activates specific Payout BOs, and—critically—is where Qualifying Activities, Incentive Tiers, and Review Windows are concretely defined. Each variant is the complete, executable specification of what a specific audience or channel receives.	Variant start/end dates, active products (subset of Base), active eligibility (subset of Base), active payout, Review Window Details, Qualifying Activities, Incentive Tiers, tax reporting ID, tracking codes, required offer code quantity and type
Eligibility	Defines who can enroll: customer context, segment logic, residency, credit profile, employment status, previous bonus lookback windows, and product/account eligibility rules. Can be governed as an independent, reusable BO selected into both Base and Variant Offers, or defined directly within the Variant Offer for simpler or highly variant-specific eligibility configurations.	Eligibility primary context and category, employee eligibility, customer residency and geographic region, customer type and credit score, segment eligible/ineligible codes and mode, segment source system and evaluation timing, customer and account previous bonus eligibility, product and account eligibility



Payout (4 typed BOs)	Defines how and when the reward is delivered. Split into four purpose-built types: • Reward (cash/points/stock/credit), • Interest (rate boost/promotional APY) • Fee Waiver (monthly fee, overdraft, annual fee) • Benefit (non-monetary: lounge access, insurance, upgrades). Each carries its own accounting logic, SLA, and clawback controls. Preapproved and reusable across offers.	Payout type, reward categories per BO type, delivery timing and posting schedule, payout SLA window, funding cost center, execution and transaction codes, clawback strategy, account restriction window, qualifying activity linkage (All/Any, Variant Configurable)
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Each Business Object has independent versioning, lifecycle-management, and approval-gates. A change to a Payout BO does not automatically require reapproval of the Eligibility BO. This separation is the foundation of governed agility.

The Hierarchy That Makes Everything Possible

The most consequential design principle in the Naehas Standard Data Model is not any individual Business Object; it is the governance cascade that connects them. The Campaign determines which Products are valid. Products constrain what Base Offers can be built. Base Offers set the guardrails within which Variant Offers operate. No level can exceed the permissions granted by the level above it.

This hierarchy has a specific and practical consequence: decisions made at the right level stay there. The Campaign team decides which channels and products are in scope—once. The offer governance team defines the eligibility universe, the approved payout structures, and the enrollment caps—once, at the Base Offer level. The marketing team executes variant-level decisions such as qualifying thresholds, audience targeting, and incentive values, without reopening any of the governance above them.

The result is what Naehas calls the **“Stock the Shelf”** operating model: preapproved, reusable offer assets that campaigns draw from rather than rebuild. When a new campaign launches, it selects from the shelf. When a new audience needs a different qualifying threshold, a new variant is configured within the Base Offer’s guardrails. The governance work is done once; the execution work scales.



03

The Variant Offer: Where Strategy Becomes Execution

Why Qualifying Activities, Incentive Tiers, and Review Windows Live Here

In the Naehas Standard Data Model, the Variant Offer is not simply a channel-specific configuration layer. It is the complete, executable specification of what a particular audience receives—and it is where the three most operationally complex elements of an offer are concretely defined: Qualifying Activities, Incentive Tiers, and Review Windows.

This design choice is deliberate and outcome driven. Qualifying activities and incentive structures are not universal across all audiences and channels for the same base offer. A mass-market deposit variant might require a \$2,500 direct deposit to earn a \$200 bonus. A premium segment variant of the same base offer might require \$10,000 in net new money to earn \$600. Both inherit the same product constraints, the same stacking policy, and the same approved payout method. But they differ precisely where business strategy differs: at the variant level.

Consolidating this logic at the Variant Offer level also has a direct operational benefit: it provides the executable artifact that drives real-time eligibility evaluation, qualification tracking, and reward calculation. Fulfillment engines draw from one governed object rather than from a constellation of internal systems.

The Variant Offer is not just a configuration object. It is the governed artifact that fulfillment consumes directly to determine enrollment validity, qualification status, and reward delivery.

Qualifying Activities

Each Qualifying Activity represents one behavioral requirement the customer must satisfy. The Variant Offer supports repeatable activity slots, each independently configurable by type—account opening, balance accumulation, transaction volume, direct deposit, spend thresholds, and more—with sub-type filters (e.g. ACH credit vs. wire vs. mobile deposit) and minimum per-transaction floors. Threshold values carry Variant Configurable applicability, meaning the Base Offer sets the structural type of the activity, and the Variant tunes the specific amount or count to its audience.



Review Windows

Review Windows define the qualification clock: when it starts (account open date, enrollment date, first transaction date, campaign start date), how long it runs, how often it repeats for recurring reward structures, and whether a buffer period applies to accommodate late-posting transactions. These are also variant-level—the same base offer can have a 60-day window in one variant and a 90-day window in another, without reopening Base Offer governance.

Incentive Tiers

Incentive Tiers are defined in a parallel repeatable structure alongside Qualifying Activities. Each tier specifies the reward amount, reward type (cash, points, statement credit, rate boost, fee waiver, non-monetary benefit), currency, and delivery timing. Tier values are constrained by min/max guardrails and increment rules set at the Payout BO level, ensuring no variant can set a reward outside the preapproved financial envelope. Tax reporting classification and funding source apply uniformly across all tiers, preventing inconsistent accounting treatment across variant configurations.

Qualifying Activities and Incentive Tiers are parallel structures within the Variant Offer. Activity slot 1 maps to Tier 1. Activity slot 2 maps to Tier 2. This direct mapping is the data model's mechanism for connecting behavior to reward—without a separate lookup or interpretation step at execution time.





04

Eligibility: Independent Governance or Embedded Precision

The Dual-Mode Design That Matches Institutional Maturity

Eligibility is one of the most governance-sensitive domains in financial offer management. Who can enroll determines regulatory exposure, fairness risk, and fulfillment accuracy. The Naehas Standard Data Model recognizes that institutions approach eligibility governance at different levels of maturity and provides two distinct operational modes.

Mode 1: Independently-Managed Eligibility BO

In this mode, Eligibility is configured as a standalone, preapproved Business Object that lives outside any specific offer and can be reused across multiple Base Offers and Variant Offers. An institution might create an “NTB Credit Card Standard Eligibility” BO and reference it across dozens of acquisition offers without rebuilding the eligibility logic for each one.

This mode delivers maximum reuse efficiency and the strongest governance posture. Changes to the eligibility criteria—say, adjusting the geographic region or adding a new ineligible segment—happen once in the Eligibility BO, and all offers referencing it reflect the change through their own change management process. The compliance team approves the Eligibility BO once; every offer that references it benefits from that approval.

The independently-managed Eligibility BO encompasses the full scope of who can enroll: primary eligibility context (customer, account, household, prospect), employment status, residency and geographic constraints, customer type and credit profile, segment inclusion and exclusion logic with source system governance, previous bonus lookback windows at both the customer and account level, and product/account eligibility conditions.

Mode 2: Eligibility Defined Within the Variant Offer

For simpler offers, early-stage implementations, or eligibility configurations that are so variant-specific they would never be reused, eligibility criteria can be defined directly within the Variant Offer itself. This reduces the number of objects that need to be independently governed and approved, trading reuse efficiency for configuration simplicity.



Even in this mode, the same field-level governance applies. Attributes such as Segment Source System and Segment Mode remain non-variant-configurable by policy—the external data dependency and inclusion/exclusion semantics are always fixed at the point of definition. What changes is the organizational home of that definition, not the rigor of the governance applied to it.

The choice between modes is not a technical preference; it is a governance strategy. Institutions with broad offer portfolios across multiple products and channels maximize value from the independent BO model. Institutions in earlier stages of offer governance maturity may find embedded eligibility a practical starting point on the path to full decomposition.



05

The Payout Architecture: Four Typed BOs for Four Reward Categories

Moving Beyond a Single Payout Record

The Naehas Standard Data Model takes a typed approach to payout governance. Rather than a single generic Payout BO, the model defines four purpose-built payout objects, each engineered for the specific accounting treatment, calculation logic, and regulatory disclosure requirements of its reward category. This typing is not cosmetic—it is what allows the platform to route rewards correctly to core banking systems, apply the right tax classification, enforce category-specific guardrails, and assemble accurate disclosures automatically.

Payout BO Type	Reward Categories	Key Governance Dimensions
Payout—Reward	Cash, Points, Statement Credit, Points Multiplier, Stock Shares, Stock Fractional Shares, Stock Credit, Percentage Back/Match	Reward_Payout_Amount (Variant Configurable), Reward_Clawback_Strategy, Account_Routing_Priority, Qualifying_Activities linkage (All/Any), SLA Window, Account Restriction Window
Payout—Interest	Rate boost, promotional APY, interest multiplier on deposit or brokerage balances	Reward_Interest_Rate (Variant Configurable), Reward_Interest_Rate_Type (fixed/variable), Calculation_Method, Calculation_Frequency, Minimum_Balance, Maximum_Interest_Amount, Interest_Period
Payout—Fee Waiver	Monthly service fee waiver, overdraft fee waiver, wire fee waiver, annual fee waiver	Reward_Fee_Type, Reward_Fee_Modality_Type (full waiver vs. reduction), Reward_Fee_Amount (Variant Configurable), Fee_Charging_Frequency, Fee_Plan, Account_Restriction_Window
Payout—Benefit	Lounge access, travel insurance, priority boarding, extended warranty, companion certificate, concierge services	Reward_Benefit_Type, Reward_Benefit_Frequency, Reward_Benefit_Description (required for disclosure assembly), Qualifying_Activities linkage



Each Payout BO carries its own Qualifying Activity linkage fields—Qualifying_Activities_All and Qualifying_Activities_Any—enabling multi-payout offers where different behavioral requirements trigger different reward types. A deposit offer might require a Direct Deposit (Qualifying Activity 1) for a cash bonus and a minimum balance maintenance (Qualifying Activity 2) for a rate boost. Each payout is triggered by its own activity, all governed within a single Variant Offer without any manual coordination required between the two reward tracks.

The clawback architecture is equally precise. The Reward Payout BO's Reward_Clawback_Strategy field references a matrix of defined clawback scenarios, and fulfillment rules are explicitly implemented to execute the logic associated with each strategy. This ensures clawback decisions are not made ad hoc by operations teams, but are driven by preapproved, auditable strategy definitions that travel with the offer through every channel and every fulfillment cycle.

This typed architecture also has a direct and important implication for disclosure governance. Because the platform knows exactly which payout type applies to a given offer and variant, it can automatically assemble the correct disclosure language—Reg Z language for interest-bearing rewards, 1099 language for taxable cash bonuses, benefit description text for non-monetary awards—without human interpretation at the point of content assembly. The offer's structure drives the disclosure, not the other way around.



06

Applicability: The Governance Engine of Variant Personalization

How the Model Enables Scalability Without Sacrificing Control

The Naehas Standard Data Model answers a question that every financial institution must answer, but that most answer inconsistently and manually: which offer parameters can be changed at the variant level without triggering a full reapproval?

Every field in the model carries an Applicability designation, one of four values:

Applicability Value	Meaning	Governance Rationale
Campaign Only	Fixed at the Campaign level. No Base Offer or Variant may override it.	Channel permissions, eligible product universe, audience boundaries, campaign dates—the strategic frame that all downstream decisions must respect
Base Offer Only	Fixed at the Base Offer level. Variants inherit but cannot override.	Offer type, fraud risk classification, stacking policy, enrollment caps, terms and conditions—the governance guardrails binding on all variants
Variant Configurable	Can be tuned at the Variant level within the guardrails set above.	Qualifying activity thresholds, segment codes within the approved universe, payout amounts within guardrail ranges, offer dates within campaign window, review window duration
Variant Required	Variants must specify this field—it has no default at the Base Offer level.	Tracking codes, required offer code quantity and type, variant start and end dates—parameters that are inherently instance-specific

This framework is the operational engine of personalization at scale. It is what enables an institution to deploy 145% more offer volume without 145% more compliance overhead. The governance work is done once, at the Campaign and Base Offer levels, and then variants inherit that governance boundary and operate within it. The compliance team approves the parameters of the offer; the marketing team executes within those parameters across as many variants as the strategy requires.



Changing a field's Applicability designation, for example, elevating a qualifying threshold from Variant Configurable to Base Offer Only, requires reapproval. Applicability designations are governance decisions, not configuration preferences. That distinction is the difference between controlled agility and uncontrolled risk.

The practical application is precise. A qualifying activity threshold carries Variant Configurable applicability, allowing a \$2,500 minimum direct deposit in one variant and \$5,000 in another for a premium segment, without reapproving the qualification structure. Segment codes carry Variant Configurable applicability within the universe approved at the Base Offer level. But the stacking policy, the fraud risk level, and the enrollment cap are Base Offer Only—the financial and regulatory guardrails that no variant should be able to weaken unilaterally.





07

From Offer Definition to Fulfillment: Closing the Loop

Why Data Model Integrity Drives Fulfillment Accuracy

A governed offer data model is only valuable if it connects to execution. The Naehas platform is designed around a closed-loop architecture in which the offer definition governs every downstream fulfillment decision: enrollment validation, qualification tracking, reward calculation, payout posting, and claw back determination.

The connection is direct and traceable. Each enrolled customer's journey is evaluated against the approved Variant Offer version in effect at the time of enrollment. Because Qualifying Activities, Incentive Tiers, and Review Windows live directly in the Variant Offer, fulfillment systems leverage it as the executable artifact that drives real-time eligibility and reward calculation—it is assembled from a single governed object rather than from a constellation of linked internal systems. This reduces orchestration complexity and eliminates a class of fulfillment errors that arise from data joining across several siloed, asynchronously-updated systems.

This means:

- Eligibility rules executed at enrollment reference the active Eligibility configuration for this variant—customer context, segment codes, residency, previous bonus lookback, and account constraints.
- Qualification tracking measures customer behavior against the Qualifying Activities defined in the Variant Offer—activity types, thresholds configured for this variant's audience, and the Review Window governing when measurement occurs.
- Reward calculation references the Incentive Tiers defined in the Variant Offer—matching qualifying activity completion to tier-specific reward amounts, types, and delivery timing.
- Payout execution references the active Payout BO—governing destination channel, posting timing, SLA, execution codes, and claw back policy.

The result is a complete, traceable audit trail from offer approval through customer payout. Every fulfillment outcome can be traced back to the specific Variant Offer version that governed it, answering the regulatory question, "what was shown to whom, when, and on what terms," with precision and speed.



Real-Time Eligibility and Enrollment at Scale

The Naehas platform supports both batch-based and real-time enrollment flows. Real-time eligibility enables any bank-managed interface—web, mobile, contact center, branch—to query the platform for immediate enrollment validation, reducing dependency on third-party eligibility tools and enabling in-the-moment offer presentment.

For institutions managing complex multi-enrollment scenarios—customers who enroll in the same offer multiple times with different accounts—the platform’s secondary key architecture enables complete tracking of all enrollments while enforcing the configured strategy: allow all, award first to achieve, or disqualify secondary enrollments. No fulfillment activity is lost regardless of the number of enrollments or account configurations.

Backdating, Merges, and Operational Edge Cases

Financial services fulfillment is not clean. Customers open accounts mid-offer period. Customer IDs merge. Transaction data arrives late. The Review Window’s buffer period—configurable at the Variant Offer level—accommodates late-posting transactions, preventing disqualification on technicalities. Backdated enrollments allow qualification windows to consider pre-enrollment activity. Customer ID and account merge events are handled natively. Posting file management provides end-to-end lifecycle visibility from enrollment through final payout posting.

Fulfillment accuracy is not a feature of the fulfillment engine alone. It is a function of the quality and structure of the offer definition that governs it. A governed offer data model is the prerequisite for governed fulfillment.



08

The Economics of Governed Offer Management

Quantifying the Return on Structural Investment

The business case for a governed offer data model is not abstract. Naehas clients have demonstrated measurable, auditable outcomes across every dimension that matters to a financial institution's marketing and operations leadership.

Outcome	Measured Result	Structural Driver
Offer cycle time	120 days → 30 days	Separated Campaign/Base Offer governance; Variant inheritance eliminates reapproval for configuration changes; direct fulfillment execution from Variant Offer eliminates risk of discrepancies between what was approved and what was executed.
New banking deposits generated	\$1.8B+ in first 10 months	Faster launch velocity combined with real-time eligibility and fulfillment accuracy driven by the unified Variant Offer definition
Offer volume capacity	+145% increase	Reusable Eligibility and Payout BOs, Variant inheritance, and Applicability framework eliminate per-campaign rebuild overhead
Manual batch processes removed	42 removed	Structured Variant Offer definition enables automated fulfillment rule execution in place of manual reconciliation across fragmented systems
Customer call volume	-60%	Fulfillment transparency and qualification status tracking reduce customer inquiries about reward status and eligibility decisions
Personalization capacity	3× increase	Variant Configurable thresholds, segment codes, and review windows enable audience-level tuning at scale within Base Offer guardrails
Customer complaints	-44%	Accurate, traceable fulfillment with consistent eligibility enforcement reduces surprise and dissatisfaction at payout time
Legal rejection rate	22% → 0%	Governed disclosure assembly and AI-powered compliance assessment eliminate manual error introduced by document-based offer management



These results share a common thread: they are not the product of incremental improvements to existing processes. They are the product of a fundamental rearchitecture of how offer logic is defined, governed, and executed. Process improvements compound on top of structural improvements; structural improvements make certain outcomes possible that process improvements alone cannot achieve.

The \$1.8 billion in new deposits is not a consequence of better creative or more aggressive pricing. It is a consequence of being able to launch and fulfill more offers to more precisely targeted customer segments with greater speed and accuracy than was previously possible under a document-based offer management model.



09

Disclosure Governance: The Other Half of the Problem

Why Offer Governance Does Not Exist Without Disclosure Governance

Every financial offer carries disclosure obligations. APR disclosures. Reward terms and conditions. Eligibility conditions. Fee schedules. These are not optional attachments to the offer; they are, in the eyes of regulators, part of the offer itself. An offer with inaccurate, inconsistent, or incomplete disclosures is a compliance failure, regardless of how well the underlying fulfillment logic is governed.

Yet in most institutions today, disclosures are managed entirely separately from offer logic—in SharePoint folders, email attachments, and static PDF libraries. The consequence is that disclosure management has become one of the primary bottlenecks in offer launch velocity. Manual teams perform 30–70 disclosure reviews per month. ADA tagging consumes 16 hours per document. And in large institutions, 60–80% of compliance review time is consumed by disclosure-related changes.

The Naehas approach treats disclosures as governed components, not static documents. The disclosure taxonomy moves from nearly 100% static today to a target state of 10% static, 20% shared (centrally governed blocks reused across documents), and 70% dynamic (parameterized, token-driven, rules-based assembly). This transformation has a measurable impact: legal rejection rates, which commonly run at 22% or higher, drop to zero when disclosures are assembled from governed, approved components that trace directly to the offer's Business Object definitions.

AI-Powered Compliance Assessment

The platform's embedded AI layer provides multi-dimensional assessment of marketing content across four critical domains:

- **Regulatory Compliance (UDAAP):** Detection of high-risk terms, proximity rule validation, eligibility awareness, and channel-specific disclosure requirements.
- **Disclosure Accuracy and Consistency:** Verification that all required disclosures are present, accurate, and consistent with the offer's terms as defined in the Business Objects.
- **Brand Experience:** Grammar, trademark handling, readability, sentiment analysis, and brand-voice compliance across customer segments.
- **Personalization Validation:** Metadata and token validation to confirm that personalized content references the correct variables, offer codes, and data mappings.

This is not a spell-checker or a style guide. It is a compliance intelligence layer that understands the relationship between an offer's Business Object definitions and its customer-facing content and can detect, at scale, when that relationship has been broken.



10

The Future State: Offers as Bank Assets

From Campaign Artifacts to Governed, Reusable Bank Infrastructure

The institutional shift that Naehas is enabling is more profound than a technology upgrade. It is a change in how financial institutions conceptualize the offer itself.

In the current paradigm, an offer is a campaign artifact: created for a specific launch, managed in a campaign folder, governed through a campaign approval workflow, and archived when the campaign ends. The institutional knowledge embedded in that offer—which eligibility rules were applied, which qualifying thresholds were set, which payout structures were approved—lives in documents that are difficult to search, impossible to reuse, and nearly impossible to audit at scale.

In the Naehas paradigm, an offer is a bank asset: a versioned, governed, reusable structure that the institution “stocks the shelf” with over time. The Product BO is an asset. The Eligibility BO is an asset. The four typed Payout BOs—each carrying its own clawback strategy, SLA configuration, and disclosure linkage—are assets. The Base Offer that assembles these components into an approved offer framework is an asset. These assets can be composed into new Variant Offers without rebuilding the underlying logic. They can be updated independently, with the change management process scoped to only the dimension that changed. They can be referenced in audit and regulatory examination with precision.

The question financial institutions should ask is not “how do we launch this campaign faster,” but “how do we build an offer factory that makes every campaign faster, more compliant, and more personalized than the last one?”

This vision is captured in the Naehas NorthStar operating model, which describes five stages of offer lifecycle governance:

- 1. Strategy Initiation:** Define customer needs, business goals, and reward concept within a Campaign. This is where intent is defined and the Product and channel guardrails are set. The shelf is organized in this stage.
- 2. Offer Construct Definition:** Build the Base Offer and Variant Offers with linked Eligibility and Payout BOs, and define Qualifying Activities, Incentive Tiers, and Review Windows at the Variant level. Eligibility BRDs are eliminated, and eligibility is structured, not interpreted.



- 3. Offer Governance Shelf:** Approve and lock the offer package as an immutable, reusable asset with auto-generated promo codes. The offer becomes a governed bank asset ready for any campaign that needs it.

Channel Execution: Apply campaign-level targeting, timing, and channel strategy without reopening offer governance. Change management at the campaign level does not reopen the Base Offer or its variants.

- 4. Enrollment, Qualification, and Fulfillment:** Execute enrollment and qualification against the approved Variant Offer definition, triggering accurate payout with full traceability. Fulfillment consumes the governed offer; it does not interpret it.

This operating model represents the maturation of financial services marketing from a craft operation—skilled individuals managing complex processes through expertise and judgment—to an engineered operation, where governance is embedded in structure, decisions are made once and consumed many times, and scale is achieved through reuse rather than replication.



11

Conclusion

The Institutions That Structure Offers Will Win

The financial services marketing landscape is being shaped by two forces that are, on the surface, in tension: the demand for radical personalization and the demand for uncompromising governance. Customers expect offers that are relevant to them specifically—their account history, their financial goals, their segment characteristics. Regulators expect offers that are fair, transparent, accurately disclosed, and fully auditable.

Most institutions are trying to satisfy both demands with infrastructure designed for neither. The result is a tax on growth: every increase in offer complexity, personalization scope, or regulatory scrutiny costs more operational overhead than the incremental revenue justifies.

The Naehas Standard Data Model, built around six Business Objects—Campaign, Product, Base Offer, Variant Offer, Eligibility, and Payout (in four typed forms: Reward, Interest, Fee Waiver, and Benefit)—resolves this tension architecturally. The Campaign-to-Product-to-Base-Offer-to-Variant cascade ensures that every executable offer is a governed derivative of an approved strategic framework. The Variant Offer's native housing of Qualifying Activities, Incentive Tiers, and Review Windows eliminates orchestration overhead and delivers fulfillment accuracy from a single governed source. The flexible Eligibility design accommodates every stage of institutional maturity. The Applicability framework enables marketing to personalize at scale within preapproved boundaries. And the four typed Payout BOs ensure that every reward category—cash, interest, fee waiver, non-monetary benefit—is governed by purpose-built logic, routes correctly to the right core system, and assembles its own accurate disclosure automatically.

The evidence is in the outcomes: 145% more offer volume. A 75% reduction in offer cycle time. \$1.8 billion in new deposits. 42 manual batch processes eliminated. 60% fewer customer calls. Legal rejection rates driven to zero.

These are not incremental improvements. They are the compound return on a structural investment in governing the offer as a first-class bank asset.

Financial institutions that treat offers as governed, reusable bank assets will outpace those that treat them as campaign documents. The architecture is the strategy.



About Naehas

Naehas is the offer management, disclosure automation, and marketing compliance platform built for financial institutions. While legacy systems force banks to choose between speed and compliance, Naehas governs the full offer lifecycle, enabling institutions to grow revenue through faster offers, reduce regulatory risk through automated disclosure governance, and deepen customer relationships at scale.

Six of the ten largest U.S. financial services companies by market cap trust Naehas to grow revenue, reduce risk, and accelerate value. Learn more at www.naehas.com.



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