

# **Compliance/Supervision**

# **Data Storage Corporation**

Excellence in Data Protection and Recovery

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Note: This manual is a supplement for the Message Logic Users Manual and designed for performing supervision and compliance.

### 1-Setting Policies and Groups

#### **Retention Policy**

Your retention policy defines the amount of time a message stays in your Message Logic system before it is removed. Setting the policy is done by your systems administrator in the Message Logic ARA administration settings and typically done during the initial set-up. If no policy is set, no messages will be removed. Before starting you should check with your Administrator to verify the retention policy. Also note that if messages are put on a legal hold the messages won't be removed until the hold is released.

#### **Supervision Set-up Overview**

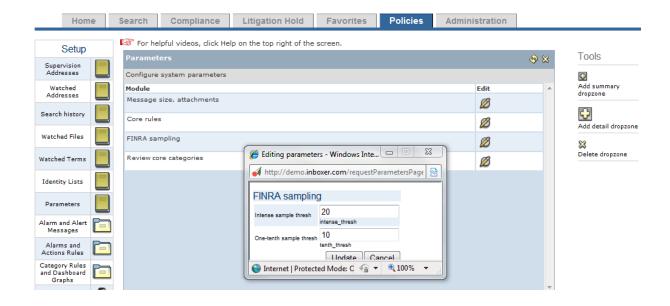
The system starts with all messages being supervised until you modify the policies. The first policy is to set the sampling rate (typically 10%). Now only 10% of the messages are being supervised. The second adjustment is to identify the users you want to supervise. If you are only using the system for supervision then 100% of the messages will be supervised. However, if you have 1,000 employees and 200 of them need to be supervised, you can upload the list of employees and only supervise that list and apply the sampling rate. The third level of adjustment is if you have specific Reviewers assigned to specific employees. You could then separate them into compliance groups. For example, if you have 3 reviewers you may set up Reviewer A with 100 employees, Reviewer B with 50 and Reviewer C with 50. You would also have the Compliance Officer with all 200 in a list.

#### **FINRA Sampling**

This section allows you to adjust the sampling threshold for performing supervision of employees. This is required by security trading laws. Setting: **Policies Tab – Parameters Droplet – FINRA Sampling** 

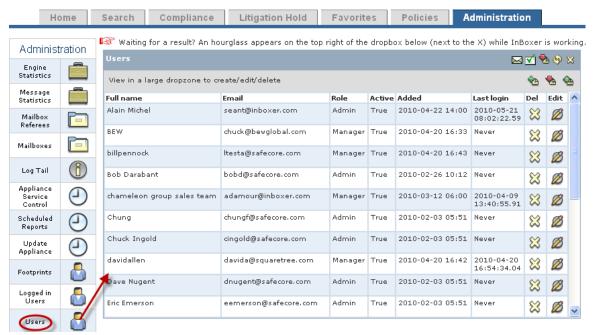
The initial default setting is 10%. Changing the One-tenth sample threshold to 5 would result in 5%. The Intense Sampling Threshold governs the Watched Addresses droplet on the left. There is no need to adjust this unless you have specific requirements to manage users on a Watched List.

**Recommendations**: One you set your thresholds avoid changing them. Changes will only apply to future messages.

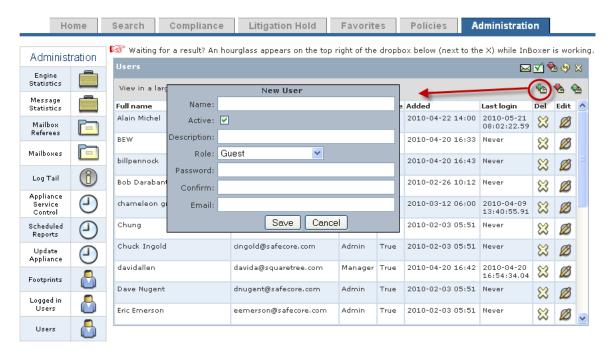


#### Adding Users/Compliance Reviewers to the System

You will need to add your Compliance Reviewers or other system users. Settings: Administration - Users



- **Users:** This display shows all of the users registered to the system. Including their names, email addresses, roles, when they were added to the system and the last time they logged into the system.
  - There is also Deleting, Editing and Adding functions described below, as well as a list export.



Solo	A solo user is an employee who is given the right to log into the system access their archived mail. As a solo user they will only see their own archived mail and no other features of the system.				
Guest	A guest can access the system with very limited functionality				
User	Users will have access to all tabs with the exception of Policy and Administration. A Complian Reviewer is typically a User.				
Manager	A Manager has all of the rights of a User with the addition of access to set policy in the Policy Tab. A Compliance Officer should be a Manager.				
Admin	An Admin has access to the entire system including the Admin Tab and Admin ARA.				

Note: It is important to understand the full role of a person being assigned access rights and in some cases you will want to create separate user credentials for one person. If a User is a Compliance Reviewer and is assigned a group of addresses/employees to supervise, they will be restricted to only see that group when logged in with their credentials. If they also want access as a solo user to see their own archived mail, you will need to create a separate ID for them as a Solo user. This is done to distinguish an identify of every user in the system.

#### **Assigning User Access Rights**

In this section an Admin can further restrict a User or Manager to see only specific Tabs. Setting: **Admin–User Access** 



#### **Setting up Compliance Groups**

If you go to the Policies Tab and Supervised Addresses you can establish Reviewer Groups with specific watched addresses. In the example below you would upload a list of employee addresses, including email, IM or Bloomberg to each of the Compliance Reviewers using the Green arrow at the end of the row. Once this is done; when they do a review they will only see these addresses. For the Manager or Chief Compliance officer in this example you would upload a complete list of all the addresses being reviewed by all of the Reviewers. TheManager/Chief Compliance Officer would then see all of the employees being reviewed and could create a complete report.



#### **Creating Compliance/Supervision Tags**

: At the top of every screen you will find this icon on the top right. To create a compliance/supervision tag, click on the icon.

A screen like this will appear:



To create a set of tags for you to use in message Compliance/Supervision, Click on the + sign in the corner + -

Result: All Current Tags will pop up

1. Click the plus sign to create a new tag.



Result: A new window will appear, allowing you to fill in information



- 2. Fill in a name and description
- 3. Check if you want it to be a public tag for anyone to use. If you don't identify it as public, it will only be available to you.
- 4. Check Yes, No, Maybe for messages that you want to put on hold. A hold will prevent a message from deleting from the system at the end of its scheduled retention time
- 5. Click Update

Name	Project A		
Description	emails relevant to project A		
	Public Category want to be hel		
Hold messages tha	t are marked: "	tagged with a Yes, a No, or a	
	✓ Yes	Maybe (number of yes messages)	
	■ Maybe	(number of maybe messages)	
	□No	(number of no messages)	
Update		Cancel	

This example shows the tag as Project A. For Compliance or Supervision you may want to consider tags such as Supervision – Reviewed or Supervision – Action Taken. Create as many tags as you will need and keep in mind that you can apply multiple tags to a message.

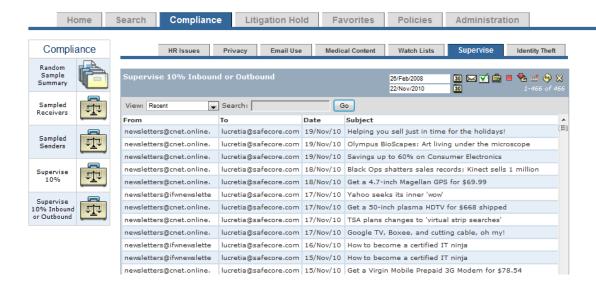
## 2-Performing a Review

#### **Supervise**

Supervision is a requirement by the SEC and FINRA for financial firms. A percentage of emails (usually 10%) processed each day need to be reviewed for compliance with language acceptable by the SEC or FINRA for all financial trades

The search droplets include the following:

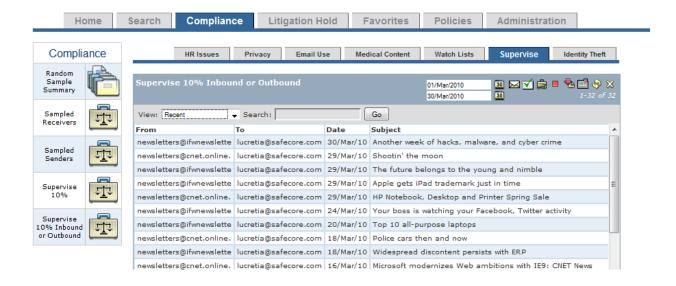
Search droplet	Description
Random Sample Summary	This droplet performs a random sample of the messages during the selected date range.
Sampled Receivers	Sampling of receivers
Sampled Senders	Sampling of senders
Supervise 10%	Random sampling of 10% of all messages which were processed during the data range specified. This includes Inbound, Outbound and Internal
Supervise 10% Inbound or Outbound	Random sample of 10% of only Inbound and Outbound messages processed during the selected data range. (excludes Internal messages)



**Note:** If you have established Groups of employees to be supervised by a Reviewer, they will only be able see messages from those selected individuals based on the sampling rate. (Supervise 10%)

#### Supervision/Compliance Review

The example below uses the category of Supervise 10% Inbound or Outbound. Start by dragging the droplet from the left column into the workspace. On the top right, set the date range. In this example the date range is the month of March 2010.



#### **Review and Tag messages**

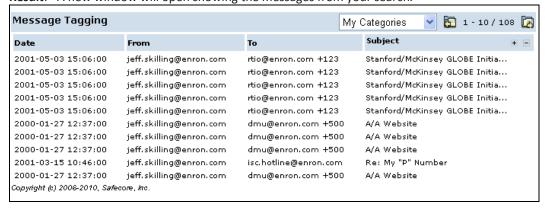
Once you have your search completed you can review the messages and apply the compliance/supervision tags that you created earlier (if you haven't, see Section 1 – Set-up).

Email: This icon on the top of every screen is to Mark, Tag, or Annotate messages. After performing a search you can then give messages a Tag.

#### Steps to tag messages

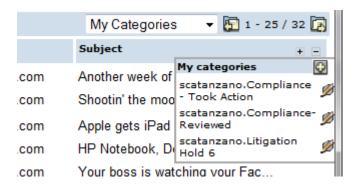
1. Click the tagging icon

Result: A new window will open showing the messages from your search.



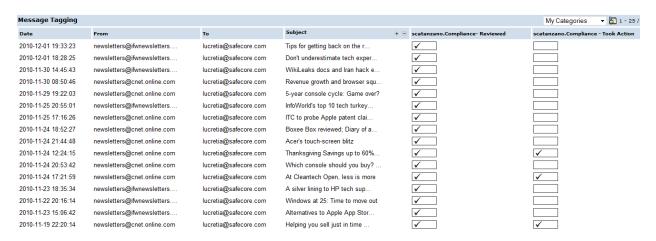
2. Click on the + sign in the corner

Result: All of your Tags will appear. Both public and private tags will be available.



3. Select the Tags you want to use and apply. When you select a Tag, it creates a column. You can create multiple columns to apply more than one tag on a message.

**Result**: In the example below 2 columns were created. One with a Tag of Compliance- Reviewed and one with the Tag of Compliance – Took Action.

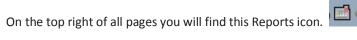


4. You can now review and tag each message. By clicking each message you can open the message and review it's content including any attachment. You can then decide the action on each tag. For example, with the Compliance- Reviewed Tag you can select any of the three options of Yes, Maybe or No the tag applies. In most cases you would simply mark the messages with a Yes when the Tag applies. An example is placing a Yes on every opened message to indentify that fact that it has been reviewed.

The three boxes are where you can designate a Yes, No, Maybe for each message



## **3-Creating Reports**





To create a report, perform a search with the date range you need a report on. The results of the report will export in an Excel File with these tabs:

- Overview
- Message Summary
- Viewed Detail
- Forwarded Detail
- **Decision Detail**

# **4-Performing a Discovery Request**

See Message Logic Users Manual, Chapter 3 and 4 for performing searches and discovery.