# Message Logic®

Email Archiving | eDiscovery | Analytics

# Compliance and Supervision Guide

Contact Support for assistance:  support@messagelogic.net

Modified on 10/02/2015

# Contents

**Note:  This manual is a supplement for the Message Logic User's Manual and designed for performing supervision and compliance.**

# 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 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.
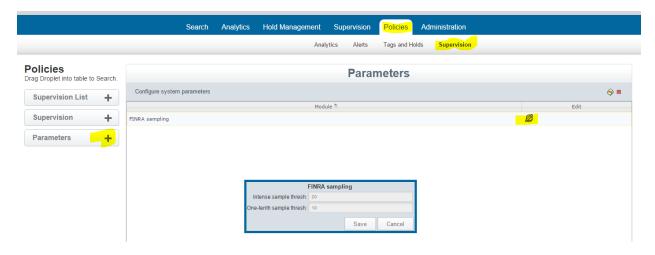
## Supervision Set-up Overview

The system starts with all messages being supervised until you modify the policies. The first policy is to set the sampling rate (typically 10%). When set only 10% of the messages will be 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 – Supervision - 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. 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 **by going to the Administration Tab, then Access Control and Users.  By selecting the green plus button in the center you can create a new user.**

Employees and administrators can have multiple accounts on the system.  For example, you may have an account with Solo access which lets you see all of your personal messages.  You may also be an administrator with access to all messages in the system.  This is done to distinguish an identity of every user in the system.

For Supervision there are two designations.  There is a Compliance Officer and Compliance Reviewer.  These designations are the only designated users for the Supervision tab.
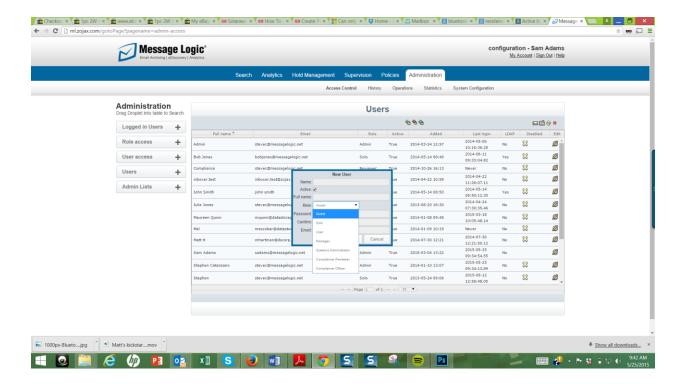
Single Reviewer
If there is only one person who performs reviews you can set them up as a Compliance Reviewer.

Multiple Reviewers
If you have multiple people who perform reviews they would each be a Compliance Reviewer.  If they have designated individuals to review, you can upload lists of employees to the system and associate each reviewer to a list.  This is described further into this document.  If no lists are uploaded, then each Compliance Reviewer will see all the employees.
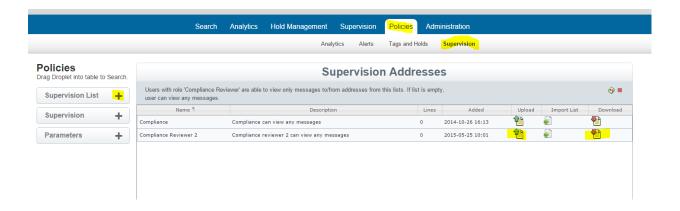
Only a portion of employees need review
In this case, a list of the supervised employees can be added to the system for management under the Supervision section. This is described further into this document.

## Setting up Compliance Groups

If you go to the Policies Tab the Supervision and Supervision List you will see the screen shot below which shows a list of all system users registered as Compliance Reviewers.  To the right of each name, you can upload a list of specific users the Compliance Reviewer needs to supervise.  If no lists are uploaded, then they have access to all employees for Supervision under the Supervision tab.  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.

The Chief Compliance Officer is not listed.  If there are no Compliance Reviewers or if no list is associated with any reviewer, the Compliance Officer will see all employees when in the Supervision Tab.  However, once a list is added the view is restricted to users on the list.  With multiple reviewers, each with a list, the Compliance Officer will see employee emails for all of the lists combined.
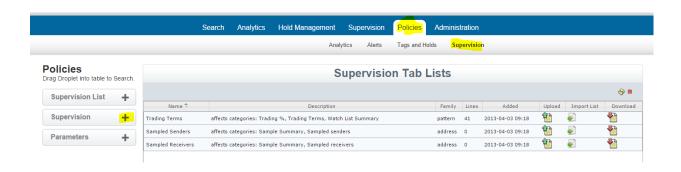


## Trading Terms, Sampled Senders, Sampled Receivers
From Policies/Supervision you can select the Supervision droplet on the left to make addition modifications.
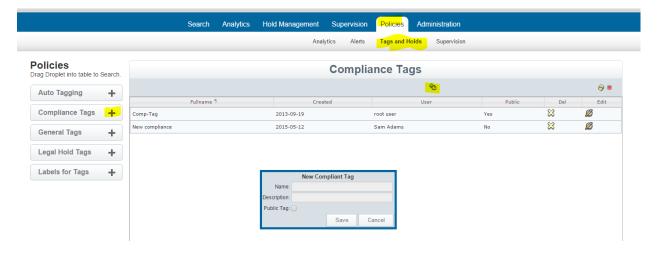
Trading terms is a specific list of terms the system will flag for you in the supervision tab.  You can download the current list, make changes and replace.

Sampled Senders and Sampled Receivers lets you identify specific senders and receiver email addresses to supervise.  The threshold for the sampling is described in the FINRA sampling section.

## Compliance Tags
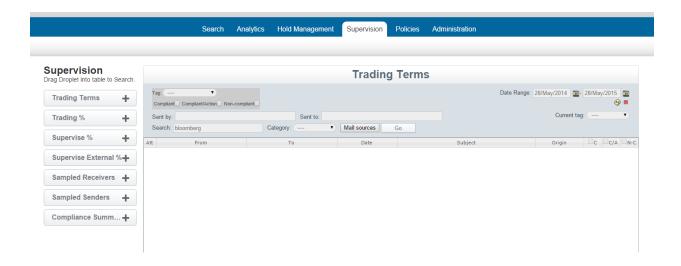
Before starting a compliance review. Create a tag (virtual folder) by going to Policies/tags and holds/Compliance Tags. Click the green plus and create your folder.



## Supervision Workflow and Process

Supervision is an area designed for compliance officers and reviewers who need to proactively monitor the message content used by employees. Below is a screen shot of the Supervision tab.

Below is a list of the Droplets with a description:

| Droplet | Description |
|---|---|
| Trading Terms | The system is populated with trading terms, which may be modified by going to Policies/Supervision/Supervision List.  This droplet will identify all messages, which contain any of the specified trading terms you want flagged. The terms are highlighted in the message when you select the magnifying glass icon during message review. |
| Trading % | This area combines Trading Terms and the sampling % set under Supervise %.  All messages identified would be part of the Supervise 10% and contain a Trading Term as defined in the Trading Terms List.  The terms are highlighted in the message when you select the magnifying glass icon during message review. |
| Supervise % | The system can sample 10% of all messages.  Once they are marked as a sampled message they remain marked.  For example, if you review all messages that were marketed yesterday, and run this same date range in a month from now, the same messages will appear.  There is no re-sampling as you run a search.  To set the % sample rate go to Policies/Supervision/Parameters/Finra Sample |
| External % only | This option allows sampling of just external communications and does not include internal messages between employees. This % is the same setting as supervise %. |
| Random Sample Summary | Summary of sampled senders and receivers below |
| Sampled Receivers | In Policies/Supervision/Sampled Receivers you can upload a list of email addresses.  All messages received by members on this list will be compiled into this section for review. |
| Sampled Senders | In Policies/Supervision/Sampled Senders you can upload a list of email addresses.  All messages sent by members on this list will be compiled into this section for review. |

The default on Trading Terms, Supervise % and External % is to apply these rules to all messages coming into the system.  To refine review to specific groups and assign a Compliance Reviewer, please see instructions below.

# Workflow

**Initial Settings**  (See table above for setting details)

- Upload a list of trading terms.  Please note:  If at any time you upload a new list or modify the current list this will affect future messages, but not previously reviewed messages.
- Set supervision %.
- Set sampled receivers if desired
- Set sampled senders if desired.

## Compliance Officers and Compliance Reviewers

- To effective use the Supervision capabilities the user should be activated as a Compliance Officer or Compliance Reviewer.  Please note:  If there is only one person performing reviews they should be created as a Compliance Reviewer.  The Compliance Officer function is designed to oversea Compliance Reviewers.
- Go to Administration/Access Control/Users.
  i. Top of the workspace select the green button to pull up a new user dialog box.
  ii. Parameters are:  Login name, full name, password and email address.
  iii. In the pull down menu select Compliance Reviewer or Compliance Officer.
  iv. Select Active and Save when done

## Supervision Lists

- If you have a structure where employees are assigned to a Compliance Reviewer who monitors their activity, you have the ability to assign employees to each Compliance Reviewer.
  o Now that you have at least one Compliance Reviewer in the system you can go to Policies/Supervision/Supervision List.  Here you will find the name of the Compliance Reviewer and two file icons.  One icon is to upload a list of email addresses to assign to each of the Compliance Officers.  The second is an icon to download the current list for review.  You can download the current list, modify it and then upload it with changes.  All changes will be going forward and not retroactive.
- **Please Note**: Once you upload a list to the system you have changed the review process from looking at all messages to looking just at messages from the Supervised List.  It is recommended that you make sure everyone who needs supervision in on a list assigned to a Compliance Reviewer and the lists are kept current for new employees.
- A Compliance Officer has access to all lists assigned to Compliance Reviewers.  If you need an additional manager you can also combine lists.  For example, you may have a manager who overseas two of four compliance reviewers.  In this case you can create them as a Compliance Reviewer and upload a combined list of the two Compliance Reviewers they manage.
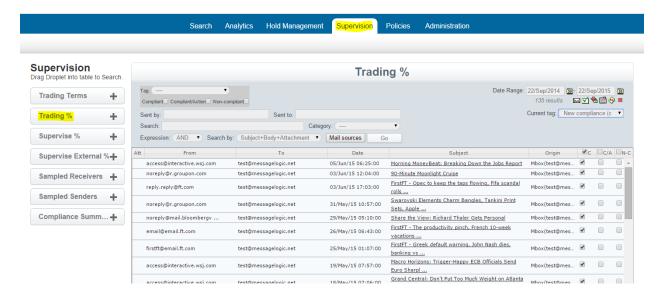
## Tagging

- The Message Logic system has designed compliance tags, which are designed for use by Compliance Officers and Reviewers.  You can view a Compliance Tag as a Virtual Folder.  The tag is the title of the folder.
- To create a compliance tag you can go to Policies/Tags and Holds/Compliance Tags.  When you click the green plus sign on the top a dialog box will appear to create your tag.  Any tag can be public or private for your own use.  You can change the status as needed.
- For compliance review the default message actions are:  Compliant, Compliant/Action, non-compliant.  Compliant with action means it still passes the test, but some action is needed.  If you

prefer to use different labels you can go to Policies/Tags and Holds/Labels for Tags and edit the labels.
- Tags are useful to manage your review process and copy messages into different virtual folders which make it easy to export or report on specific activity.
- For compliance reviewing you need to have at least one Compliance Tag (Virtual Folder) created.

You are now ready to start reviewing messages. Depending on your specific requirements you can work with any of the droplet options. As an example, below is a screenshot of Trading %.



In this example, Messages have been compiled which are part of a 10% sample and have a pre-defined trading term somewhere in the message. The next step is to select the tag (Virtual folder) you created. On the right is a pull down menu called Current Tag. This will display all tags (Virtual Folders), which are available for you to use. Below this you will see three columns marked as Compliant (C), Compliant with Action (C/A) and Non-Compliant (N-C). After reviewing a message you can select one of these labels for the message. If no label is selected it will not be part of the Tag (Virtual folder) you created, but will remain marked in the system as a Trading % and always accessible in this category.

Other options available include:
- Data range – you can always adjust a date range for your search
- Sent by and Sent to can be refined to search on specific users. Always remember that Supervision is tied to the Supervision List of employees that we uploaded to the system.
- Search area allows you to add in specific text, or phrases you may want to search on.
- On the right side below the date range a set of functions will appear as shown in the table below.

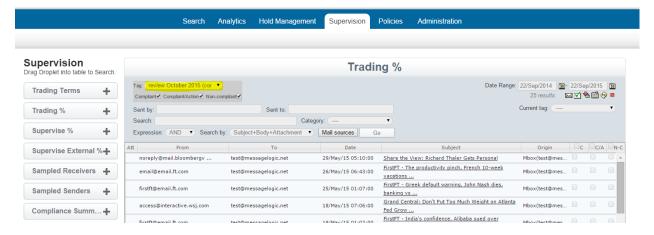| Icon | Function | Description |
|---|---|---|
| ✉ | **Message Report** | By clicking this icon the system will send a report on all of the messages in the workspace to the current user. The messages will arrive as an email |
| ✔ | **Report Scheduler** | This icon allows you to schedule a daily, weekly or monthly report on searches, analytic categories and much more. |
| ⬇ | **Download Emails** | Once you have completed a search you can download the entire search to your desktop in a Zip format. Note that this downloads all of the messages from the |

| | | search and not just the messages seen in the workspace.  If this is a large download it will go to Search/Download Results where you will find multiple files for you to download. |
|---|---|---|
| | **Compliance Report** | This downloadable report contains details on the search that was performed and all of the resulting messages.  Also includes any message comments, tags and actions. |
| | **Refresh** | This icon will refresh the current search |
| | **Stop** | This icon will stop the current search or running process |

An alternative way to tag as message for a folder is to open the message by clicking on the subject and tag it at the top.
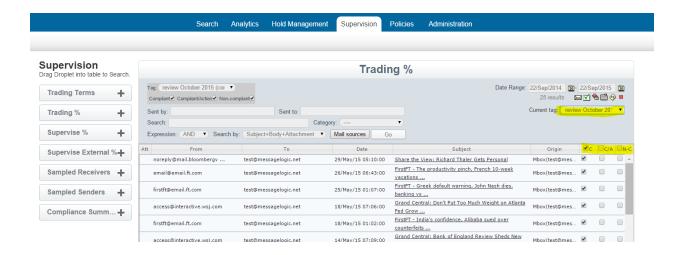


Once you have added a message to a folder it will remain in the folder as marked until it is removed by unmarking it or once it reaches its retention date and is removed from the system.

To return to a virtual folder you can select the folder from the top left column, set the date range (or just set a wide range of dates) and make other selections as needed such as how the messages were marketed, specific senders or receivers and even specific text or a mail source.



All messages meeting the criteria will be displayed.  However, they will not show how they were marked.  To see how they are marked for this tag you can set the current tag dropdown to the same folder you are working with as shown below:

You can now modify how messages are marked.  In some cases you might be trying to merge two folders together or add these messages to a new folder.  Rather than selecting the same folder under current tag you can select the new folder or folder you are merging with.  You can then mark the messages and they will be added into the new folder.

At any time you can export the messages by selecting the red download icon.  Please refer to the Exporting and Viewing Messages Guide which shows different options for extracted messages.

There is also a complaince report which can be downloaded by clicking on the spreadshhet icon.  This will show all of the displayed messages with notes, how they are marked and additonal information.

For additioanl assistance please contact Message Logic Support at support@messagelogic.net