

Securities and Exchange Commission

Rule 17–CFR 270.17a-4

The Securities and Exchange Act of 1934 includes provisions that require exchange members, brokers and dealers to maintain and preserve records of their business, including transactions, trade confirmations, communications (including interoffice memoranda), and written agreements. The SEC has updated these rules to include provisions for storage of records on electronic storage media as it relates to Computer Information Technology, including word processing software, spreadsheet and financial software and email software, as well as hardware devices and media to store electronic information. This equates to all communications related to the business, including internal communications. The SEC states that records must be retained under Rule 17a-4 (17CFR 240.17a-4). Record-keeping deficiencies are among the most common reasons that the SEC Office of Compliance Inspections and Examinations refers cases to the Office of Enforcement or to Self Regulating Organizations (SROs) for investigation. The following are relevant paragraphs within SEC Rule 17 regarding preservations of documents and electronic communications, and how our Redmap Solutions help meet these compliance risks:

Rule	Solution	Practical Application
<p>240.17a-4 (f)(2)(ii)(A) Electronic Storage Media must be "non-rewriteable" and "non-erasable"</p>	<p>ManageSuite Circulate</p>	<p>Manage Circulate feature allows for the storage/copying of indexed information to "non-rewriteable" and "non-erasable" CD/DVD or defined drive locations. The system would retain meta-tag identification of the indexed information. Once queried for information stored elsewhere, the system will prompt loading of the specific CD/DVD and/or drive where the actual information resides. In addition, the Circulate feature can embed a viewer directly to the media. With this embedded viewer, Manage search and view functionality is achieved, with no ability for the user to edit or append to data. This search and view functionality may be achieved via inquirer's CD/DVD drive alone (without the need to load any additional application)</p>
<p>240.17a-4 (f)(2)(ii)(B) Verify accuracy of the recording process</p>	<p>Manage and CaptureMail Secure Archiving</p>	<p>CaptureMail and ManageSuite provide that all documents in any standard format, i.e.; graphic images, faxes, audio files, C14email message information (including attachments) MS Office etc, are securely archived with time/date stamping at the index execution point. The accuracy of this recording/indexing process may be further verified at the transaction level through the indexing engine, the ManageSuite Connector.</p>
<p>240.17a-4 (f)(2)(ii)(C) Serialize and time-stamp storage media</p>	<p>Manage Data Accuracy</p>	<p>Manage systems automatically provide sequential and chronological numbering of documents messages, groups of messages. The system places a date/time stamp on all indexed data whether located on secure network drives or on removable media.</p>


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<p>240.17a-4 (f)(2)(ii)(D) Have the ability to readily download records and indexes to electronic storage medium</p>	<p>Manage Access</p>	<p>Indexed enterprise documents, emails and attachment data may be exported/copied/downloaded to any designated on or off-line location or separate media. The system retains meta-tag identification of the indexed information. Once queried for information stored elsewhere, the system will prompt loading of the specific CD/DVD and/or drive where the actual information resides. Indexed documents/attachments may be immediately retrieved in native or summary format.</p>
<p>240.17a-4 (f)(3)(i) At all times have available, for examination by SEC staff, any self-regulatory organization, or state securities regulator having jurisdiction over the member, broker or dealer, easily immediately readable projection or production of micrographic media or electronic storage media for producing readable images of documents.240.17a-4 (f)(3)(ii) Be ready at all times to immediately provide, any facsimile enlargement to SEC staff, any self-regulatory organization, or state securities regulator having jurisdiction over the member, broker or dealer.</p>	<p>Manage Retrieval and Circulate</p>	<p>Find it Fast: Indexed documents, facsimiles, emails and attachments etc. may be immediately retrieved and viewed in native application format.</p> <p>Manage Suite's Circulate feature allows for the copying of selected indexed information to CD/DVD, embedding a Manage viewer directly to the media. With this embedded viewer, Manage search and view functionality is achieved via inquirer's CD/DVD drive alone (without the need to load any additional application) .</p>
<p>240.17a-4 (f)(3)(iii) Store duplicate copies separately from the original.</p>	<p>Manage Configurable Storage</p>	<p>ManageSuite data storage may be specifically configured to conform with an organization's guidelines and policies regarding data back-up/duplication, storage, and recovery, as designated at the infrastructure level.</p>
<p>240.17a-4 (f)(3)(iv) Organize and index accurately all information maintained on both original and any duplicate storage media.</p> <p>240.17a-4 (f)(3)(iv)(A) At all times, a member, broker, or dealer must be able to have such indexes available for examination by the staffs of the Commission and the self-regulatory organizations of which the broker or dealer is a</p>	<p>Manage Retrieval Capability</p>	<p>Indexed information may be retrieved immediately via user-configurable parameters at the Manage administration level. These definable fields may be based upon any number of parameters (user/user ID, specific codes etc.), with field associated with integrated databases. Using unique Intelligent Content archiving engine, the content of email messages and their attachments may be immediately located based on plain English query.</p>

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Rule	Solution	Practical Application
<p>240.17a-4 (f)(3)(iv)(B) Duplicate indexes must be stored separate from the original</p> <p>240.17a-4 (f)(3)(iv)(C) Duplicate and original indexes must be stored for the required length of time</p>	<p>Manage Configurable Storage</p>	<p>ManageSuite library and index structure may be specifically configured to conform with an organization's guidelines and policies regarding data back-up/duplication, storage, and recovery, as designated at the infrastructure level.</p> <p>The system may also be configured to conform with applicable retention policies.</p>
<p>240.17a-4 (f)(3)(v) Member, broker, dealer must have in place an audit system providing for accountability regarding inputting of records required to be maintained and preserved pursuant to Rules 17a-3 and 17a-4 to electronic stage media and inputting of any changes made to every original and duplicate record maintained and preserved thereby.</p>	<p>Manage Archiving and Storage</p>	<p>Extensive audit trails are maintained for individual Manage system users who may have access to any system information. This tracking is completed for all indexed information in the system for: Appending, Copying, Deleting, Editing, Emailing, Exporting, Forwarding, Indexing, Log-in, Moving and Searching. Audit information may be easily retrieved completely, by activity classification, through specific date range query and may be filtered by description.</p>
<p>240.17a-4 (f)(3)(v)(A) At all times, a member, broker, or dealer must be able to have the results of such audit system available for examination by the staffs of the Commission and the self-regulatory organizations of which the broker or dealer is a member.</p> <p>240.17a-4(f)(3)(v)(B) The audit results must be preserved for the time required for the audited records.</p>	<p>Manage Audit Tracking and Storage</p>	<p>ManageSuite audit reports may be immediately produced on any individual for any number of selected activities and date ranges, or for all operations listed previously. ManageSuite audit reports may exported to a designated system, and/or sent to removable or fixed media. Audit reports may be produced in both HTML and text formats.</p> <p>All ManageSuite indexed data is immediately retrievable upon specific field storage parameters may be configured to conform with retention policies as set by a specific organization.</p>
<p>240.17a-4(f)(3)(vi) The member, broker, or dealer must maintain, keep current, and provide promptly upon request by the staffs of the Commission or the self-regulatory organization of which the member, broker, or broker-dealer is a member all information necessary to access records and indexes stored on the electronic storage media...</p>	<p>Manage Archiving and Retrieval</p> 	<p>Indexed information may be retrieved immediately via user-configurable parameters at the Manage administration level. These definable fields may be based upon any number of parameters (user/user ID, specific codes etc.), with field associated with integrated databases. Using Redmap's unique A.I.. (artificial intelligence) engine, the content of emails and their attachments may be immediately located based on plain English query. ManageSuite Circulate</p>

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