

Information Request List

*For purposes of this examination, the term “electronic messaging” is intended to include any and all forms of written communication conveyed electronically, including but not limited to instant messaging, text/SMS messaging, email, and personal or private messaging, whether conducted on the Adviser’s systems or third-party applications (“apps”) or platforms, and whether sent using the Adviser’s computers, the Adviser’s mobile devices, or personally owned computers or mobile devices used by the Adviser’s personnel (including independent contractors) for the Adviser’s business, that are subject to the requirements of Rule 204-2(a)(7) or Rule 204-2(a)(11) under the Investment Advisers Act of 1940. **For purposes of this exam, the term electronic messaging is not intended to include email messages that are sent or received using the Adviser’s email system and retained by the Adviser.***

This examination covers a review period of _____ through _____ 2017. Please provide the following records, as applicable, for the entirety of that review period.

Background Information

1. Please describe or define the Adviser’s and its associated persons’ use of electronic messaging services or platforms, including what is and is not permitted. Please also describe any differences in the use of electronic messaging by different types of personnel (*e.g.*, employees vs. independent contractors) or people in different positions (*e.g.*, internal investment personnel, traders, client facing representatives, etc.).
2. Please describe the devices that are permitted and/or prohibited for use in electronic messaging (*e.g.*, Adviser owned computers, personal computers, personal mobile devices, Adviser provided mobile devices) and the specific electronic messaging conducted through each type of device (*e.g.*, private messaging or instant messaging using Adviser-provided or third-party applications such as social networks or “chat” services, instant messaging using third-party equipment such as Bloomberg terminals or other trading terminals, etc.).

Compliance Program

3. Provide copies of all written policies and procedures addressing the use of electronic messaging.
4. Please provide a description of any informal or unwritten policies or procedures concerning the use of electronic messaging.
5. Please identify all persons responsible for overseeing the Adviser’s policies and procedures concerning electronic messaging and a brief description of their roles and responsibilities pertaining to electronic messaging.

6. Describe the Adviser's processes for any ongoing monitoring and review of electronic messaging communications by the Adviser's associated persons.
7. Please describe how the Adviser evidences any ongoing monitoring or review of electronic messaging and provide examples of any relevant exceptions reports, activity reports, etc.
8. Has the Adviser detected any violations of its electronic messaging policies and procedures or any unauthorized use of electronic messaging during the review period? If yes, please describe the issues and any actions taken by the Adviser as a result.
9. Please provide a summary of all findings associated with any internal audits or compliance reviews related to the Adviser's or its associated persons' use of electronic messaging, and provide copies of any written reports documenting such reviews.
10. Please provide copies of any risk assessments or identifications of risks related to electronic messaging and the how the Adviser mitigates or addresses these risks. Please identify any moderate or high risk findings and any remediation efforts undertaken in response to each finding.

Recordkeeping

11. Does the Adviser maintain records of what devices and applications are being used for authorized electronic messaging and by whom?
12. Please describe how the Adviser maintains required records relating to, or resulting from, electronic messaging. Please include how long such electronic messages are maintained and where the electronic messages are maintained.
13. Are electronic messages maintained by a third-party vendor? If yes, please describe that process and provide a copy of any contracts or agreements with that vendor.
14. Provide copies of any written policies and procedures related to the retention of electronic messaging.

Security and Privacy of Information

15. Please provide any written policies and procedures addressing the transmittal of sensitive information (including non-public information, personal client information, etc.) in electronic messaging.
16. Please provide a description of any informal or unwritten policies or procedures concerning the transmittal of sensitive information in electronic messaging.

17. Please provide any written policies and procedures addressing security measures/precautions the Adviser takes to ensure the security of sensitive information transmitted through the use of electronic messaging.
18. Please provide a description of any informal or unwritten policies or procedures addressing security measures/precautions the Adviser takes to ensure the security of sensitive information transmitted through the use of electronic messaging.
19. Please describe any known breaches in securing information contained in electronic messaging and describe any action the Adviser took with respect to those breaches.