

Electronic Communications Archiving and Supervision

KEY BENEFITS

- Efficiently and defensibly archive *all* types of eComms and provide robust audit and reconciliation reporting as proof;
- Search, filter and produce data in *real time* from even the largest repositories in the industry; and
- Deliver an easy to use, intuitive and flexible supervision and review platform aligned with the way in which professionals work and leveraging a risk based approach to eliminate false positives from their queue.



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IMANAGE WORK PRODUCT MANAGEMENT

- **iManage Work:** Secure document and email management
- **iManage Share:** Secure governed file sharing and collaboration
- **iManage Insight:** Enterprise content search and analysis
- **iManage Govern:** Archiving, Records, Threat detection and Security Policy Management

Introduction

Since the enactment of SEC rule 17a-4, firms have struggled to meet their baseline regulatory requirements to retain, make accessible and produce emails and other forms of electronic communications (“eComms”). Fines for these failures have in some cases exceeded \$10m and the over-retention of irrelevant and superfluous data has resulted in eDiscovery and review costs that, conservatively, have exceeded \$1B. What is rarely discussed, but perhaps more significant, is the substantial operational burden that eComms supervision and review have placed on firms, adversely impacting the productivity of supervisors and compliance staff tasked with managing this unwieldy process.

Unfortunately, the current technology platforms that support these processes have not substantially evolved in the past 10-15 years. Vendors have been satisfied to deliver on the status quo without addressing the overriding business and risk objectives of their clients or responding to pressure to deliver superior functionality and performance at lower cost.

The iManage Solution

Using the same building blocks as modern technology giants such as Google and Twitter, iManage Comply was built from the ground up to address these critical business drivers. Our private cloud solution supports, by design, encryption of sensitive data, both at rest and in motion, to ensure broader compliance with the cybersecurity guidance of the SEC and other regulators.

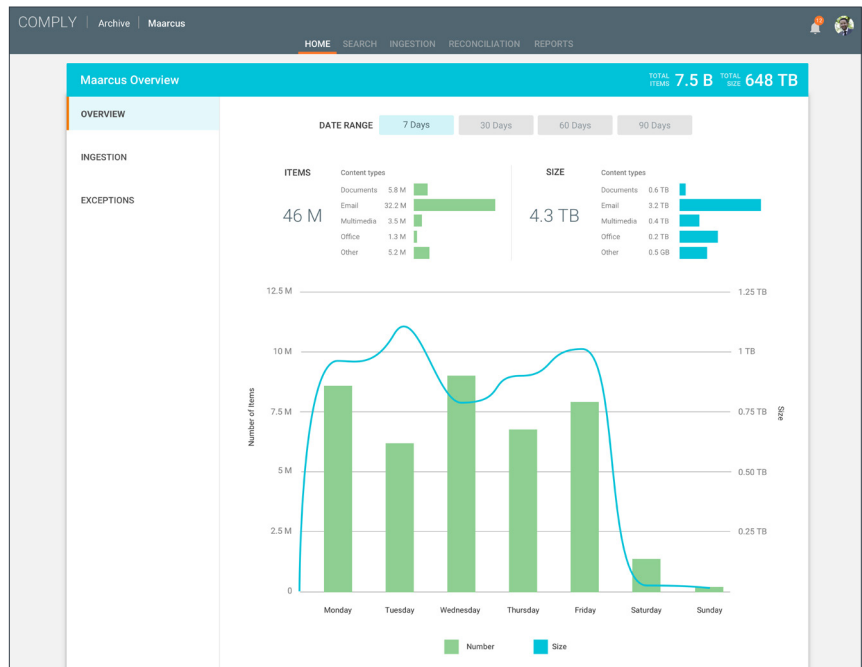
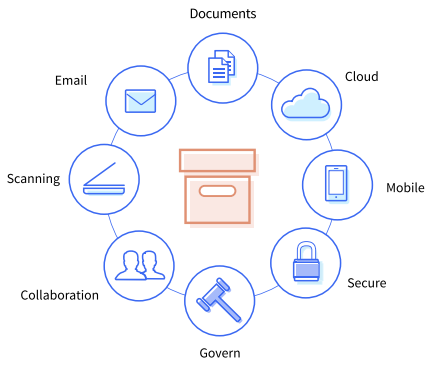
Our platform addresses the critical business drivers facing financial services firms

Certainty – Archive Module

From the outset, we recognized it was essential to instill confidence in our ability to provide firms with robust audit and reporting capabilities across the lifecycle of every archived item – from ingestion through disposition. Through our administrative dashboard and alerts, we make it easy for compliance and IT teams to identify potential issues before they compromise regulatory obligations.

In addition to archiving your data, it has become increasingly important to identify issues and data types that compromise the accessibility of messages for supervision and discovery purposes. Our exception reporting highlights and aggregates ingestion and indexing issues such as corrupt or encrypted messages that could impact search and policy violation fidelity.

MANAGE ALL CONTENT IN A SINGLE REPOSITORY



Archive dashboard alerts administrators of potential problems

Our Legal Hold module leverages our robust search capabilities to give you peace of mind that we are preserving content subject to legal hold, as well as the confidence to exercise a disposition strategy consistent with your records retention policies.



Manage retention, disposition and legal hold in a single view

Given the heightened sensitivity to Cybersecurity and recent attacks such as the Sony email hack, we designed our repository from the outset with security in mind. Because our platform is built on the same industrial strength

“On-premises deployments and hosted vendor managed services are giving way to vendors that offer multitenant software-as-a-service (SaaS) models, leverage big data architectures, and invest in analytics.”

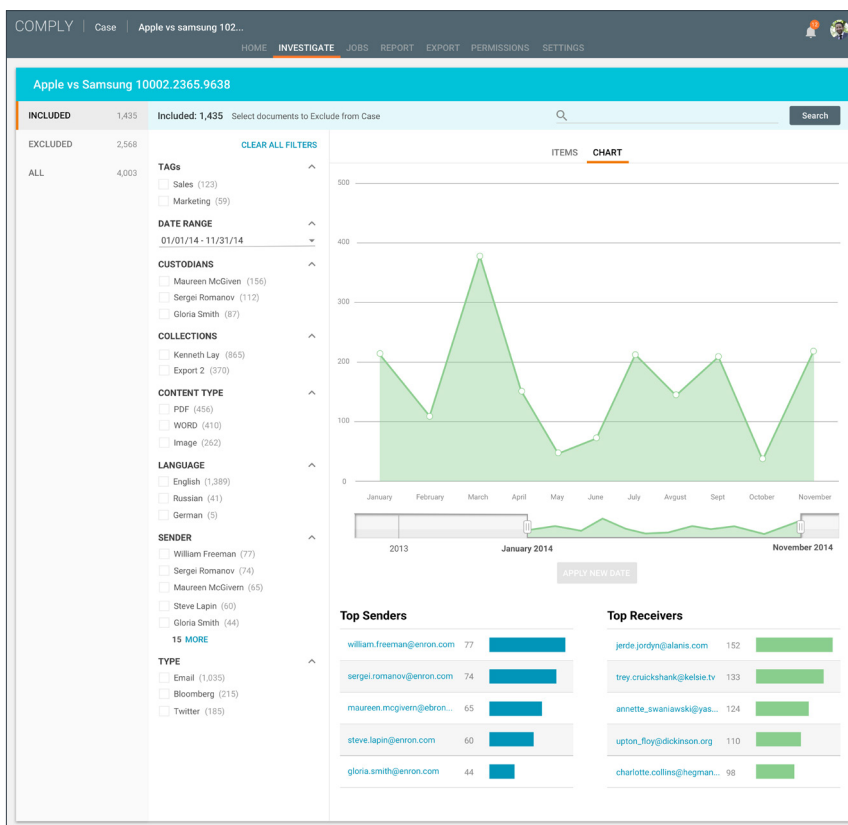
— **The Forrester Wave™: Information Archiving Cloud Providers, Q4 2016**

technology that has been vetted and tested by some of the largest platforms in the world, our security and encryption capabilities will continue to evolve to thwart emerging threats and benefit from the experiences and innovation of the industry as a whole. In addition, we leverage our own behavioral analytics technology to go beyond perimeter security and file level encryption to identify potential threats well before they impact your firm.

Accessibility – Discovery Module

With the exponential increase in the volume of eComms being generated and the challenges firms have faced to dispose of legacy data, many firms have archives that contain tens of billions of messages. Not only has this resulted in a bottleneck when responding to time sensitive discovery and regulatory requests, but it has also compromised the fidelity and completeness of search results. Our implementation of industry leading indexing and search technology reflects the unique characteristics of an eComms archive, resulting in near real time results from even the broadest searches.

Firms that must regularly produce messages from their archive recognize that identifying potentially responsive data is only the first step and that productions and exports from the archive frequently require several passes because of gaps to insure completeness. The iManage Comply Investigator module facilitates the identification of potential gaps and the filtering out of business spam and non-responsive items prior to export. Our clients will have the ability to respond to critical requests in a timely and accurate fashion and will realize substantial savings in downstream processing and review costs.



Conduct preliminary Early Case Assessments (ECA) prior to export



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Flexibility – Supervision Module

For firms that have a regulatory obligation to review eComms, we have designed the iManage Comply Supervision module with the end user in mind. Our review interface is intuitive to use, minimizing the need for training. We have also streamlined the approval and escalation process to significantly improve reviewer productivity.

The screenshot displays the 'COMPLY | Review' interface. On the left, there are filters for GROUPS (Trading, Sales), DATE RANGE (1-7 days ago, 8-30 days ago, 31-60 days ago), DIRECTION (Internal, Outbound, Inbound), NUMBER OF RECIPIENTS (1, 2-10, More than 10), ATTACHMENTS (No Attachments, Has Attachments), POLICIES (Customer Complaints, AML, Gifts & Entertainment, Unapproved Research), SENDER (William Freeman, Serge Romanov, Maureen McGivern, Steve Lapin, Gloria Smith), and TYPE (Email). The main area shows a list of messages, with one selected: 'Weekly Market Summary' from Jill Ansonia (Sales) on 09:02 PM, 03/10/2017. The detailed view of this message includes a 'Weekly Market Summary' section with a 'US Research' policy, a 'Universal Health Services-UHS-BUY' section with a 'US Research' policy, an 'Account Liquidity' section with an 'AML' policy, a 'low risk investments' section with a 'Customer Complaints' policy, an 'Internal Only' section with an 'Unapproved Research' policy, a 'No complaints' section with a 'Customer Complaints' policy, and an 'MSG Suite' section with a 'Sales' policy. The right sidebar shows a 'Weekly Market Summary' section with a 'US Research' policy and a 'Waters Corp- WAT-NEUTRAL' section with a 'US Research' policy.

Intuitive supervisor interface

iManage Comply supports the well-established lexicon and sampling based flagging methodologies to identify items for review. We have also designed our data architecture with the future in mind to support alternative supervision workflows such as segregated subject matter expert review. Our advanced flagging capabilities have evolved from traditional keyword driven searches to leverage state-of-the-art machine learning and the inherent analytics capabilities of our underlying technology.

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About iManage™

iManage is the leading provider of work product management solutions for legal, accounting and financial services firms and the corporate departments they serve worldwide. Every day, iManage helps professionals streamline the creation, sharing, governance and security of their work product. Over 3,000 organizations around the world—including more than 2,000 law firms—rely on iManage to help them deliver great client work. Headquartered in Chicago, IL, iManage is a management-owned company. For more information, please visit <https://imanager.com>.

