

SOCIAL MEDIA COMPLIANCE PROGRAM CHECKLIST

Background Information		COMMENTS
Electronic messaging services or platforms - Use		
<input type="checkbox"/>	What is permitted	
<input type="checkbox"/>	What is not permitted	
<input type="checkbox"/>	Special Restrictions – General – All Employees	
<input type="checkbox"/>	Special Restrictions – Investment Personnel	
<input type="checkbox"/>	Special Restrictions – Traders	
<input type="checkbox"/>	Special Restrictions – Client Facing Representatives	
<input type="checkbox"/>	Third-Party Systems – Permissible Uses and Users	
<input type="checkbox"/>	Third-Party Systems – Impermissible Uses and Users	
Electronic messaging services or platforms – Devices		
<input type="checkbox"/>	What is permitted	
<input type="checkbox"/>	What is not permitted	
Compliance Program		
Policies and Procedures		
<input type="checkbox"/>	Policies on the use of electronic messaging	
<input type="checkbox"/>	Procedures on the use of electronic messaging	
<input type="checkbox"/>	Informal or unwritten policies on the use of electronic messaging	
<input type="checkbox"/>	Informal or unwritten procedures on the use of electronic messaging	
<input type="checkbox"/>	Delivery of training and educational materials to employees and third-parties on policies and procedures on the use of electronic messaging	
Oversight		
<input type="checkbox"/>	Persons/parties responsible for overseeing electronic use policies and procedures	
<input type="checkbox"/>	Description of responsible persons/parties' roles and responsibilities regarding electronic messaging	
Monitoring		
<input type="checkbox"/>	Process for monitoring and review of electronic messaging communications	
<input type="checkbox"/>	Evidence of ongoing monitoring and review of electronic messaging communications	
<input type="checkbox"/>	Identification of any violations of electronic messaging policies and procedures or unauthorized use of electronic messaging and measures in response	
<input type="checkbox"/>	Written reports of any findings involving issues/deficiencies identified via internal audits and compliance reviews of electronic messaging practices and controls	
<input type="checkbox"/>	Results of any risk assessments and identified risks involving reviews of electronic messaging practices and controls	
Record Retention		
<input type="checkbox"/>	Records of devices and applications used for authorized electronic messaging and users of such devices and applications	
<input type="checkbox"/>	Methods (hard-copy and electronic) for storing electronic messages	
<input type="checkbox"/>	Record retention for electronic messages	
<input type="checkbox"/>	Third-parties used to retain / store electronic messages; if yes, maintenance of retention process used by third-party and agreements with third-parties	
<input type="checkbox"/>	Policies and procedures defining retention of electronic messaging	
Security and Privacy of Information		
<input type="checkbox"/>	Policies and procedures (written/unwritten) on the transmittal of sensitive information (e.g., non-public information, personal client information) via electronic messages	
<input type="checkbox"/>	Policies and procedures (written and unwritten) on security measures/precautions taken to ensure the security of sensitive information transmitted via electronic messaging	
<input type="checkbox"/>	Identification of any known breaches of securing sensitive information contained in electronic messaging and measures in response	