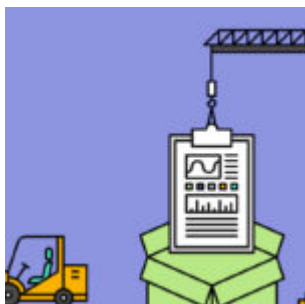


Managing Client Communication With The New Archive Tool



A consistent theme from regulators and compliance departments across the financial services industry is the need for greater oversight and supervision over their firm's processes, especially when it comes to client communications.

At Orion, we're dedicated to identifying ways we can alleviate some of the burden our compliance users face when trying to keep their firm in line with regulatory requirements. Whether you're an adviser or a broker-dealer, we're excited to announce the new Archive tool that we've developed with your most requested needs in mind.

In today's post, we'll help you see how Archive can benefit both advisers and broker-dealers, and then give you a short walkthrough to help you navigate the new tool the first time you launch it.

How Archive Helps Advisers and Broker-Dealers

If you're an adviser, you should be aware that the SEC recently amended the client communications portion of the books and records rules requirements of Section 204-2 of the Advisers Act, effective October 1, 2017. We recently published a blog that focused on the increased disclosure requirements under the Advisers Act, and how Compliance Corner app updates can help. You can check it out [here](#).

Specifically, the amendments require advisers to maintain all communications, sent or received, containing calculated performance, rate of return, or securities

recommendations. Under section 204-2(a)(16) of the Advisers Act, advisers were previously required to maintain the originals if the communication was distributed to ten or more persons.

The amendments remove this ten person condition. So how can you get copies of these reports for your records? The answer is the Archive tool.

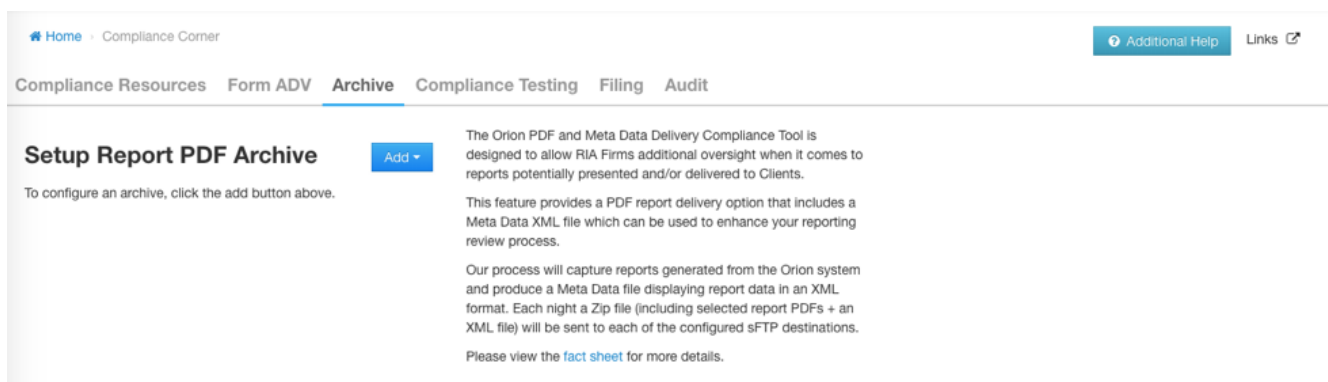
If you're a broker-dealer, Archive can help you too.

Archive is designed to give you additional oversight when it comes to reports either presented or delivered to Clients, including the ability to review the disclosures that were included on such reports.

As for how you can use Archive to accomplish these ends, let's look at that next.

How to Get Started with Archive

Archive is now available through Orion's Compliance Corner application. In fact, the next time you log into Compliance Corner, you'll see it as a tab selection across the top of your screen.



The Archive tool provides a PDF report delivery option that includes a metadata XML file, which can be used to enhance your report review process.

The Orion process will capture all PDF Reports generated from the Orion system and produce a metadata file displaying report data in an XML format. Each night a Zip file (including selected report PDFs + an XML file) will be sent to an SFTP destination of your choice.

The SFTP setup is simple and straightforward. Click the "Add" button, and then enter your SFTP configuration on the next page. Once you've saved your

credentials, you'll be ready to receive the nightly Zip file.

Home > Compliance Corner

Compliance Resources Form ADV Archive Compliance Testing Filing Audit

Custom Configuration i

Disable

SFTP Credentials

Configuration Name

Configuration Name

Description

Description

Username Password

Username Password ☐

SFTP URL

SFTP URL Test

Save Cancel

This metadata XML file can be used to help you establish logic in your system around specific data points to help you more efficiently review the reports and identify exceptions to your policies and procedures.

Reminder: You can get started with using the Archive tool right now in our Compliance Corner app. For information about these changes, please contact compliance@orion.flywheelsites.com.