

October – Compliance Call Notes

- **Friendly Reminder** = You can't solicit or service accounts, if the client or the advisor (that is YOU) is not in the US (on US soil).
 - **Calendly (or other scheduling tools):** (try to stay with me on this one 😊)
 - a) All the pages the client sees, need to be submitted into AdView
 - b) The disclosure can either be on the "profile" page (the page that list what appointments are available) **OR** the profile page doesn't need to have the disclosure IF the "page" or the access point where the client accesses the link has the proper disclosures. Example: the ONLY place the client can get your Calendly link is on your website and your website has the proper disclosures. You will need to re-submit a copy of the WEB PAGE that has the link and the disclosure on it into AdView with all the items in "a". Just make sure wherever the client can access the scheduling link has a disclosure on it.
 - **RMD (Required Minimum Distributions)** = All RMD paperwork (for Pershing and NFS accounts) needs to be INTO CIR by December 8th, it ensure it gets processed in time. See email from 10/3 → "RMD - Reminder and Resources" for additional notes and reference.
 - **Client "NOTES"** = when sending a client NOTES or "RECAP" documentation, make sure it is in a PDF format, not a word document
 - **Sponsor materials** = (even if they are client approved at the Sponsor company) still need to be submitted in to AdView.
- ➔ **SEC Marketing rule** = New rule and regulations coming November 4th. PLEASE review the link in the body of the email for webinar's/trainings and FAQ.
- 1) Most Advertising submissions will need to be re-submitted for review
 - 2) Financial Professional generated Consolidated Client statements, will no longer be allowed.
 - 3) "Performance" reporting piece, if allowed, will need additional disclosures – please res-submit to Advview
 - 4) AWARDS & Recognitions will need additional disclosures – re-submit to Advview
- ➔ **Written Information Security Program (WISP) and Cybersecurity Incident Response Plan (CSIRP)** = every advisor needs to have one on file – see link in email body. Please send to Stacey once complete. Due Nov. 15th
- ➔ **ACM (Annual Compliance Meeting)** = is due November 15th... CIR is still working on posting ACM credits (from Ignite) into the system.

Other Reminders:

- 1) **Reg BI – PTE:** Non-Qualified accounts = needs BIA (Best Interest Analysis) completed
Qualified accounts = need the RightBridge Report completed
Please upload the proper above paperwork into Trade Review when you upload the New Account/servicing paperwork. Items will be sent back in TR if the proper form is not uploaded.
- 2) **TRADE Review**
 - a) **Check Daily!** (we will no longer be sending emails to notify you that you have an item pending)
 - b) **Upload ALL documents into the system via WebCapture (ONLY via WebCapture)**
 - c) **If you need help understanding the system, please call the CLIC Team (we know it is confusing)**

d) CIR RULE – *you are not allowed to process business with sponsor companies until the trade key has been APPROVED!*

Always:

- Submit **all** advertising into AdView
- Check TRADE REVIEW ***Daily***
- ***Submit correspondence ON TIME***
- CyberFraud – be mindful of communications with clients & within the office
- **Make sure you U-4** and OBA are current and up to date
(when changes occur, you need to report within 24 hours)