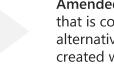
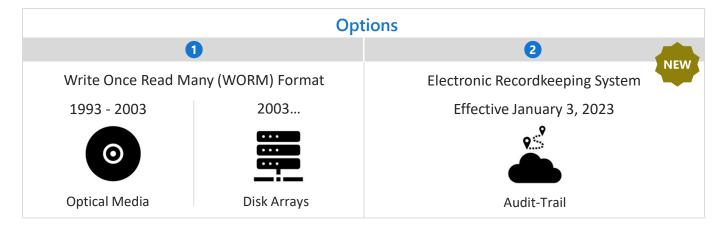


Evolution of 17a-4(f) Record Preservation Requirements

Established 1993: All records must be preserved exclusively in a non-rewritable, non-erasable format and be readily available to the SEC through a designated third party.



Amended 2022: In addition to WORM, a system that is constantly updated can be used as an alternative if the original records can be recreated with a complete audit trail and be readily available to the SEC by a designated third party **or** a designated executive officer.



WORM Storage

Advantages

- Ensures immutability of original record
- Proven established and reliable practice

Disadvantages

Costly to keep up with changing policies and events

System with Audit Trail Advantages

- Greater flexibility
- Less costly to keep up with changing policies and events
- Disadvantages · Requires careful
 - initial consideration and oversight
- New and unproven

Archive 360 and the new requirements

The Archive360 Open, Unified Archive is the go-to solution for the financial services industry. Our cloud-native information management platform was already designed to meet the new 17a-4(f) regulatory data management and storage requirements.

WORM Storage

Includes immutable WORM storage

Audit Trail

- Records are captured & preserved in their native format
- Enables re-creation of the original record if it is modified or deleted
- Maintains a complete, immutable, timestamped audit trail that includes:

Audit Trail (continued)

- o All modifications and deletions to a record
- The date and time of all create, modify or delete actions
- o The identity of the entity or individual creating, modifying or deleting the record
- o All information needed to ensure the authenticity and reliability of the original record