

# Clearwell Compliance Solution

## THE BENEFITS:

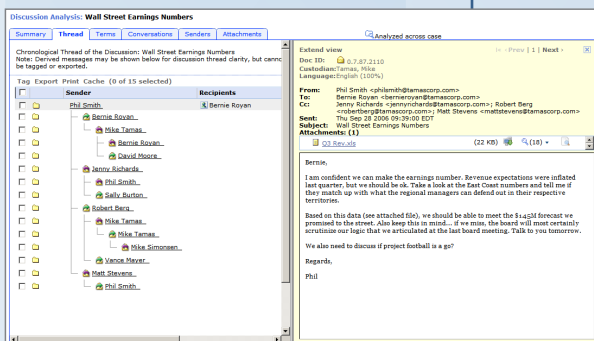
Compliance teams in the financial industry have realized immediate and significant results by using the Clearwell Compliance Solution:

- Rapidly identify and analyze key information, including emails and instant messaging threads, in context
- Easily sample key correspondence to prove compliance
- Prove process integrity through a fully reproducible audit trail
- Increase team productivity and effectiveness through rapid tagging and review capabilities

## The Challenge: More Data, More Rules, and More Dire Consequences

Regulatory compliance in the financial industry has become increasingly challenging as regulation around electronic transactions and correspondence have tightened, the amount of electronically stored information has grown, and consequences for non-compliance have become more severe. With The Gramm-Leach-Bliley Act of 1999 (GLBA), Security Exchange Commission (SEC) and Financial Industry Regulatory Authority's (FINRA) guidelines, including SEC 17a-3 and 17a-4, and NASD 3010 and 3110, financial institutions are under significant pressure to not only comply but also effectively respond to regulatory inquiries on-time.

The current approach to compliance relies heavily upon retaining large volumes of electronic communication while lacking sophisticated techniques for analyzing it. Traditional compliance tools lack the ability to automatically rebuild email and instant messaging threads and provide a summary of messages in context, increasing the risk of missing key information. Simple keyword search techniques compound the problem and increase the cost of responding by forcing already overworked personnel to review millions of false positive documents. With already short deadlines, all of these hurdles reduce the ability for organizations to respond to regulators in a timely and accurate manner. To reduce the significant risk and cost of responding to regulators, organizations must employ a new strategy.



**Discussion Threads:** Quickly identify all participants and determine who knew what and when.

## The Solution: The Clearwell Compliance Solution

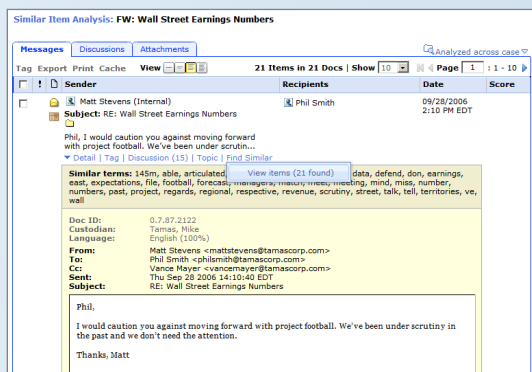
The Clearwell Compliance Solution automates the data collection and analysis process, increasing the compliance team's ability to conduct regulatory investigations in less time with greater ease and improved accuracy. The solution collects electronic files from across the organization, automatically analyzes the data, and enables compliance teams to rapidly analyze and identify all key information for an investigation. Key capabilities of the Clearwell Compliance Solution include:

**Analyze emails, attachments, and documents in minutes:** Clearwell rapidly indexes over 500 popular file types, providing the ability to access data from all critical data sources including Microsoft Exchange and SharePoint, Lotus Notes, desktops, laptops, network shares, and applications in the cloud all in a single platform with full audit trails. Messages, attachments, and metadata, including Bloomberg messages and Instant Bloomborgs, can all be viewed in a single application, with full Unicode compliance and support for over 50 languages.

**Determine exactly who knew what, and when:** Clearwell analyzes content and presents Discussion Threads, automatically linking together all related messages including all replies, forwards, CC's and BCC's, and provides a chronological thread of the entire discussion. By tracing the thread, compliance teams can review entire conversations associated with a suspected violation simply and easily. Reviewers can determine who knew what, and when, as well as identify all participants in that conversation (both internal and external), all emails, and all attachments related to their particular investigation. Reviewers can quickly tier custodians and prioritize key players for analysis.

**Quickly discover the most relevant evidence:** Employing linguistic analysis techniques, Clearwell's Topic Analysis suggests keywords and topics that are present in the data, providing compliance officers with a conceptual overview during the early stages of an investigation. Clearwell's Find Similar feature allows compliance teams to easily identify and view all items with similar content to the document under review, revealing the scope of an idea across the entire case.





**Find Similar:** Easily identify and view emails, attachments, and loose files with similar content to the document under review.

*"With Clearwell, the possibilities are endless. The solution can be used to drive better business results for any function that requires in-depth analysis of electronic documents, from compliance and legal to human resources and customer management."*

JOHN PETRUZZI  
DIRECTOR, ENTERPRISE SECURITY  
CONSTELLATION ENERGY



Clearwell Systems, Inc.  
441 Logue Avenue  
Mountain View, CA 94043  
650.526.0600 tel  
650.526.0699 fax  
www.clearwellsystems.com

**Rapidly find all instances of critical evidence:** Once a critical piece of evidence is discovered during an investigation, Clearwell's File Analytics can perform a reverse lookup across the entire case dataset to find the trail of evidence for a specific item throughout the case. Within seconds, this analysis identifies all those in possession of the evidence, as well as the location where all instances of the evidence exists.

**Discover secret project names and code words.** Clearwell's Term Analytics analyze noun phrases to help reviewers find code words or secret project names that are likely to be relevant to the case.

**Easily sample key correspondence to prove compliance:** Clearwell's "always-on" index enables message archives to be indexed incrementally on a recurring basis, ensuring that the index is always up-to-date. With Clearwell's Smart Tags, compliance teams can run previous searches automatically against new data knowing that search results are always current.

**Maximize investigation flexibility through advanced search capabilities:** Clearwell allows compliance reviewers to execute up to 100 searches simultaneously and search for specific phrases, date ranges, header information, communication between user groups, and locations. Clearwell provides the flexibility to include text variations such as plurals and alternative verb forms in search results, and also provides exact matching via literal search. Power users can leverage advanced features such as wildcard, fuzzy, proximity, and Boolean searches.

**Gain visibility into your data:** Clearwell's Transparent Search gives visibility into matching keyword variations and allows results to be filtered prior to running a search. This enables reviewers to increase search efficacy and have a higher level of transparency into the data. With Clearwell's Search Report, all search decisions and search results are automatically documented.

**Increase compliance team productivity:** Clearwell's rapid tagging capabilities allow compliance officers to easily categorize, track, and manage all emails, discussions, attachments, and documents for each case. Compliance teams can apply status codes, critical notes, and assign email and documents for review to any member of the compliance team. The solution's secure, role-based access enables teams to lock down reviewers to specific evidence associated with a particular case or set of cases.

**Prove process integrity:** Clearwell tracks every action taken by each compliance reviewer (e.g. login, logout, all searches and query terms, results, tags, print jobs, export jobs, and more) providing a fully reproducible audit trail. Clearwell can automatically produce activity reports for any auditor and for any investigation across any time frame.

**Produce proof and deliver results:** Clearwell provides a complete set of reports, documenting the relevant terms which have been searched and resulting emails, attachments, and documents which have been produced in a way that is defensible for potential downstream litigation.

**Deliver value to Legal:** Once compliance reviewers have identified relevant evidence, internal team members or external stakeholders (i.e., outside counsel) can log into the system to perform additional analysis, review, and redaction of documents. Legal can perform formal review directly in Clearwell, using capabilities including custom tags, redactions, Bates numbering, and TIFFing to complete their investigation. Alternatively, documents can be exported as a load file to other review platforms which conform to the EDRM standard, including Concordance and CT Summation.

To schedule a demonstration, contact a Clearwell sales representative at [sales@clearwellsystems.com](mailto:sales@clearwellsystems.com), or call us at **877.727.9909**.