

September – Compliance Call Notes

- Disclosing Unauthorized Information to Outside Parties - Providing unauthorized information to outside parties is a growing concern, and Cambridge wants to make sure you are aware of the steps that should be taken to obtain proper authorization before providing client information. See Compliance Alert for details. (CO-18-41)

Ñ **Pershing users** – Coming early in the fourth quarter of 2018, One-time Passcode (OTP) login will be introduced to NetX360 users to provide a greater level of security and convenience. This authentication approach will make logging in easier as users no longer need to remember additional security questions and answers. It will also be more secure because a temporary passcode will be provided via text message or email. (PE-18-16)

Ñ Consumer Authorization Reports... CIR is now required to file/process a credit and criminal background check on ALL employees, not just licensed personnel. In the coming weeks, CIR will be sending all non-registered admin a *DocuSign* link to complete and sign the required form.
Please keep in mind that our access to your credit report does not impact your credit score.

Ñ **COMPLIANCE CALLS** – **BE** on these calls each month. Third Wednesday of the month at 2pm MST
Call in number: 1-866-866-4995 Conference 2 PIN 896896#

- **2018 FIRM ELEMENT and CE** is now available on CIR's website through Knowledge Center. All requirements are due by November 1st. (**No exceptions** for late completion – so complete ASAP)
** if you are planning on attending Ignite in Indianapolis, please review Knowledge Center **prior** to the conference to see what courses you need to complete.
- **C-Share** = BEFORE a client purchases a C-Share, PLEASE call our office to confirm the purchase.
- **Variable Annuities** → *Please remember...* CIR will ask for **ADDITIONAL information** from you (in addition to the information completed/provided on the VAD) in **one** of following scenarios: 1) client is OVER age 60 2) total annuity concentration is over 50% 3) purchase is under \$50k Document, document, document!!
- **Document** – When moving **commission-based assets to fee-based**, make sure you have thorough notes on why this is being recommend and is in the best interest in the client.
(Remember A-Share assets in to season for 2 years before a management fee can be charged on it)
 - Make sure your client notes and all communications are current. Create good habits!
- **Interval Funds** – please make sure you the Net Investable Worth is updated in CLIC **PRIOR** to placing any interval trades...

Always:

- Submit **all** advertising into Adview
- Submit correspondence **ON TIME**
- **CyberFraud** – be mindful of communications with clients
- **Make sure you U-4 and OBA are current and up to date**
(when changes occur you need to report within 24 hours)