

## U.S. Securities and Exchange Commission SEC Rule 17a-3 and 17a-4 Recordkeeping Requirements

COMPLIANCE REQUIREMENTS FOR BROKER DEALERS	GREENTEC-USA WORMdisk™ SOLUTION
Every member, broker and dealer subject to Rule 17a-3 shall preserve for a period of not less than six years, the first two years in an easily accessible place, all records required to be made pursuant to paragraphs Rule 17a-3(a)(1), (a)(2), (a)(3), (a)(5), (a)(21), (a)(22), and analogous records created pursuant to Rule 17a-3(f).	<p>WORMdisks™ are a secure hard disk drive technology that enables preservation of records for retention various periods as required by SEC regulations. Records stored on WORMdisks™ may not be altered, deleted, modified or re-formatted. Policy-based retention may easily preserve records on WORMdisks™ for six years, or for any amount of time.</p> <p>All documents and records are “easily accessible” for not only two years, but for the duration of their existence on GreenTec-USA WORMdisks™. Users can accomplish easy online accessibility with any common search method, as you would with a normal hard drive storage.</p>
The member, broker, or dealer must notify its examining authority designated pursuant to Section 17(d) of the Act prior to employing electronic storage media. 17a-4(f)(2)(i)	This is the responsibility of the broker-dealer/advisor. This document may be forwarded to the SEC to inform them of GreenTec-USA WORMdisk™ deployment and functionality.
Preserve the records exclusively in a non-rewriteable, non-erasable format. (Write Once Ready Many devices.) 17a-4(f)(2)(ii)(A)	<p>WORMdisks™ provide permanent protection of electronic records with security embedded into the hardware of the disk drive itself and cannot be bypassed. The documents are stored in a non-rewriteable, non-erasable format and are tamper-proof. It does not matter what permissions are assigned, users or administrators will not be able to alter or remove electronic records.</p> <p>Data written to WORMdisks™ may be made permanently non-rewriteable at any time desired.</p> <p>Also note that the Work in Progress (WIP) records may be temporarily locked and later be unlocked as needed (with proper permissions), and later be made permanently non-rewriteable anytime desired.</p> <p>Additionally, WORMdisks™ provide several mirroring options for redundancy and disaster recovery capability including local or remote mirroring in one-to-one or one-to-many configurations. For example, one may be physically located in a commercial bank, and the other may be in a trusted offsite datacenter or in the secure WORMcloud.</p>

<p>Verify automatically the quality and accuracy of the storage media recording process. The intent of this rule is to provide some level of confidence that the record has actually been stored.(17a-4(f)(2)(ii)(B)</p>	<p>WORMdisks™ enable data verification and reliability through several methods: At the physical block level, internal disk Error Correcting Code (ECC) is automatically verified when data is initially written, internal SMART data verification is performed automatically during idle disk time by the hard disk drive itself. At the file level, periodic data verification and MD5 and SHA1 hashing verification may be automated as a host-based application.</p>
<p>Serialize the original and, if applicable, duplicate units of storage media, and time-date for the required period of retention the information placed on such electronic storage media. 17a- 4(f)(2)(ii)(C)</p>	<p>For data storage, files are time- stamped, and verified for successful completion into the storage medium. Duplicate storage media may be deployed to provide optional mirrored data into a second (or more) local or remote location. Policy-based retention preservation may be enforced based on required retention periods.</p>
<p>Have the capacity to readily download indexes and records preserved on the electronic storage media to any medium acceptable under this paragraph (f) as required by the Commission or the self-regulatory organizations of which the member, broker, or dealer is a member. 17a-4(f)(2)(ii)(D)</p>	<p>All documents, records, indexes can be downloaded to any other hard drive or file directory along with a log file describing its contents and may be rapidly searched online.</p>
<p>At all times have available, for examination by the staffs of the Commission and self-regulatory organizations of which it is a member, facilities for immediate, easily readable projection or production of micrographic media or electronic storage media images and for producing easily readable images. 17a- 4(f)(3)(i)</p>	<p>Customers can provide immediate access to an examiner to verify any contents of the WORMdisk™ repository. WORMdisks™ may remain online, or be nearline, or offline and hot-swapped to online at any time. A username can be created for the examiner, who can verify not only the records and its metadata profile, but also all history associated with each document, and its organizational context. Media images may be readily produced, copied, printed and produced onto micrographic media, depending on any organization's requirements.</p>
<p>Be ready at all times to provide, and immediately provide, any facsimile enlargement which the staffs of the Commission, any self-regulatory organization of which it is a member, or any State securities regulator having jurisdiction over the member, broker or dealer may request. 17a- 4(f)(3)(ii)</p>	<p>WORMdisks™ enable an authorized user to mass print a set of documents to a local printer, fax machine, micrographic printer, or other standard printer. The legibility of the documents will be dependent upon the customer's responsibility to ensure that electronic documents were scanned legibly. In addition, a user may simply open each document, which launches the PDF viewer (or whatever native format) to print.</p>
<p>Store separately from the original, a duplicate copy of the record stored on any medium acceptable under Rule 17a-4 for the time required. 17a- 4(f)(3)(iii)</p>	<p>WORMdisk™ solutions provide the ability for one or more mirrors to enable every record to be stored in two (or more) separate high-availability devices. Each mirror may be to a physically separate WORMdisk™ and may be in local or remote locations.</p>

<p>Organize and index accurately all information maintained on both original and any duplicate storage media. 17a-4(f)(3)(iv)(A)</p>	<p>Documents may be indexed by file directory trees, web-browser accessible manifest, or by having the search index placed on the WORMdisk™ so that it is also protected as non-rewritable, non-modifiable, non-delete able. Once stored on the primary WORMdisk™, it will replicate to the duplicate (or triplicate) WORMdisks™ automatically. The index may be used for searches using key words, phrases, Boolean operators, wild characters, proximity operators, etc.</p>
<p>At all times, a member, broker, or dealer must be able to have such indexes available for examination by the staffs of the Commission and the self-regulatory organizations of which the broker or dealer is a member. 17a-4(f)(3)(iv)(A)</p>	<p>All indexes are available and protected on the WORMdisk™ itself and may be accessed via native file system methods (e.g. File Explorer, Web Browsers, or any search tools deployed by the organization).</p>
<p>Each index must be duplicated and the duplicate copies must be stored separately from the original copy of the index. Original and duplicate indexes must be preserved for the time required for the indexed records. 17a-49f)(3)(iv)(A)</p>	<p>Any index stored on the primary WORMdisk™ will automatically be duplicated on the duplicate WORMdisk™, which allows the retrieval of the records and would be subject to the same preservation periods as the records themselves. The index will exist as long as the documents are available. All documents, records and indexes are mirrored to the duplicate WORMdisk™ which may be at a local or remote location. Both the index and the records are kept for as long as needed by the retention period. All required infrastructure for the second index is maintained separately from the original, ensuring high-availability for continuous access.</p>
<p><b>PART 240 - RETENTION REQUIREMENTS</b></p>	<p><b>WORMdisk™ COMPLIANCE SOLUTION</b></p>
<p>Every member, broker and dealer subject to § 240.17a-3 shall preserve for a period of not less than six years after the closing of any customer's account any account cards or records which relate to the terms and conditions with respect to the opening and maintenance of the account.</p>	<p>After account closing, all digital files (either work-in-process or records) are tamper-proofed and may be retained with a six year (or more) retention period.</p> <p>One of the issues of long-term records retention is to make certain that future digital formats and media are compatible with the currently stored records. The Broker-Dealer or advisors need to ensure they maintain compatibility with file formats. WORMdisks™ support standard interfaces, standard file systems, including PDF-A and other standard file formats.</p>
<p>Every member, broker and dealer subject to § 240.17a-3 shall preserve during the life of the enterprise and of any successor enterprise all partnership articles or, in the case of a corporation, all articles of incorporation or charter, minute books and stock certificate books (or, in the case of any other form of legal entity, all records such as articles of organization or formation, and minute books used for a purpose similar to those records required for corporations or partnerships), all</p>	<p>All relevant enterprise information may be maintained on WORMdisks™ which support all standard file formats including metadata fields, which can be associated with every document.</p> <p>Metadata fields may be used to indicate that a particular document is an article of incorporation, minute books, stock certificates, form BD or BDW, licenses and registrations, etc.</p>

<p>Forms BD (§ 249.501 of this chapter), all Forms BDW (§ 249.501a of this chapter), all amendments to these forms, all licenses or other documentation showing the registration of the member, broker or dealer with any securities regulatory authority.</p>	
<p>Every member, broker and dealer subject to § 240.17a-3 shall maintain and preserve in an easily accessible place: All account record information required pursuant to § 240.17a-3(a)(17) until at least six years after the earlier of the date the account was closed or the date on which the information was replaced or updated.</p>	<p>WORMdisks™ provide the ability to preserve all account records associated with an account and may be retained for at least six years after the account is closed or the date the account information was replaced or updated.</p> <p>They also provide a powerful and fast search capability, and web browser accessibility, ensuring that the customer may maintain and preserve their information and have it easily accessible—all stored in a secured and reliable high-speed electronic storage media. Multiple retention policies may be defined for six years or other specific retention periods to comply with Part 240 requirements and other policies.</p>
<p>Every member, broker and dealer subject to § 240.17a-3 shall maintain and preserve in an easily accessible place: Each report which a securities regulatory authority has requested or required the member, broker or dealer to make and furnish to it pursuant to an order or settlement, and each securities regulatory authority examination report until three years after the date of the report.</p>	<p>Each report, which a regulatory authority has requested pursuant to an order or settlement, may be flagged while storing on the WORMdisk™ with the appropriate metadata (i.e. regulatory order or regulatory settlement) and the Customer may set its retention period for at least 3 years.</p>
<p>Every member, broker and dealer subject to § 240.17a-3 shall maintain and preserve in an easily accessible place: All reports produced to review for unusual activity in customer accounts until eighteen months after the date the report was generated.</p>	<p>Unusual activity reports may be stored on WORMdisks™ in native file formats and preserved for a retention period of eighteen months (or longer) after the report has been generated. Metadata may be generated indicating that the document contains an “unusual activity report”.</p>
<p>Written advertisement never released to the public must also be kept, and made available to SSR. Customers must keep all compliance, supervisory, and procedures manuals, including any written procedures for reviewing communications.</p>	<p>The customer may implement a procedural policy that written advertisement materials are kept on WORMdisk™ storage, even though they have never been released to the public.</p>

Source: <http://www.sec.gov/rules/final/34-44992.htm> U.S. Securities and Exchange Commission Final Rule: Books and Records Requirements for Brokers and Dealers