

LPL Journaling Risk Assessment

Section 1: IT Risk Assessment:

This assessment should be completed by an Information Technology Professional who is familiar with your organizations email environment.

Part 1: Demographics

- 1. LPL requires each journaling practice to identify an LPL Associated individual (Advisor or Admin) who will be responsible to reporting to and attesting to the accuracy of the email addresses that are being journaled (Journaling Attester).**

Attester Name(s)	
Title	
Email Address	
Phone Number	
Company Name	

- 2. Please provide the email domain name(s) that will need to be journaled to LPL**

Email Domain	
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- 3. Please provide the name of the individual who has the overall responsibility for decision making with regards to managing your organization's email messaging environment (Decision Maker).**

Name	
Title	
Email Address	
Phone Number	
Company Name	

- 4. Please provide the name of the individual(s) who will be responsible for implementing the configuration changes on your email server to support the journaling process (Email Administrator).**

Primary Contact	
Name	
Title	
Email Address	
Phone Number	
Company Name	
Secondary Contact (optional)	
Name	
Title	
Email Address	
Phone Number	
Company	

5. How many LPL Associated Persons (advisors and admins) will need to be journaled?

6. Please select the option that best describes your organization's current email server environment.

Microsoft Exchange server is on premises

Version

Service Pack

Microsoft Exchange server hosted by a 3rd party/vendor

Version

Service Pack

Vendor Name

Microsoft Office 365 Enterprise

Version (E1, E3, E5)

Microsoft Office 365 Consumer version

Lotus Notes/Domino

Version

We utilize multiple email server environments or utilize a 'hybrid' solution

Describe in detail

Other (please specify)

7. **Can you establish a mailbox on your email server that will be used by LPL to monitor the health of your server's journaling connection for each domain that is being journaled? All journaling health check addresses will be formatted as [LPLJournalcheck@\[yourdomain\].com](mailto:LPLJournalcheck@[yourdomain].com). This account must be part of the same journaling group as all of the other individuals who are affiliated with LPL. This account must be established for each domain being journaled.**

- Yes - I can set this up when requested.
- No - I will not be able to comply with this requirement.

Part 2: Support information

8. **Please classify your Email Administrator's level of experience setting up journaling connectors in your current email environment.**

- My Email Administrator has set up journaling connectors in the past and is comfortable setting up a journaling connector with minimal guidance from LPL.
- My Email Administrator does not have prior experience setting up journaling connectors, however I believe they possess the skill set to do so with minimal guidance from LPL.
- My Email Administrator does not have prior experience setting up journaling connectors, and will most likely need additional resources support them in completing this task.

9. **Please classify your Email Administrator's capability to troubleshoot journaling issues in your email environment.**

- My Email Administrator has experience troubleshooting journaling issues and should be able to address any issues within 48 hours with minimal guidance or support from LPL.
- My Email Administrator does not have experience troubleshooting issues with journaling, but is able to engage additional resources outside of LPL to address any issues within 48 hours.
- My Email Administrator does not have experience troubleshooting journaling issues, and would need to rely on LPL to help address these issues.

10. LPL has a 48 hour timeframe for addressing any issues that would cause failures in the journaling process. Are you able to address any issues within 48 hours upon being notified by LPL?

Yes

No

11. Do you have the capability of tracing journaled messages from your mail server through your network and provide LPL with message transport logs to identify a potential point of failure for journaled messages?

Yes - We have the capability to do so without needing to engage any external resources.

Yes - We have the capability to do this, however we would need to engage external resources in order to do so.

No - We do not have this capability.

12. Do you outsource any managed services impacting email transport to a 3rd party service provider? (check all that apply)

Perimeter Management (email gateways/spam and virus filtering)

Vendor Name

Incident Response Time

Network Management

Vendor Name

Incident Response Time

Email Server Management

Vendor Name

Incident Response Time

Email Encryption

Vendor Name

Incident Response Time

Email Archiving

Vendor Name

Incident response Time

We do not outsource any of these services.

Part 3: Email Retention and Remediation

13. Does your organization have a process in place to archive all email messages sent or received through your email system?

- Yes
- No (skip to Q14)

13a. If yes, please choose the statement that best describes your organization's email archival process.

- All email messages are archived in a non-erasable, non-re-writable format (also known as WORM compliant).
- All email messages are archived, but our archive does not meet WORM compliance standards.
- My organization relies on a server retention policy as the sole method of archiving.
- My organization utilizes some other process to archive email messages (please describe in detail below).

Description

13b. For what period of time do you retain your archived email messages?

13c. Does your organization have any controls in place to monitor your archiving process to ensure that it is functioning as expected? If yes please describe in detail.

- Yes

Description

- No

14. If Journaling should fail, LPL requires that any emails that were not journaled be captured, including any messages that were deleted from the user's mailbox and purged from their deleted items folder. This is accomplished by the office sending all uncaptured emails to LPL in a .pst or .msg format on an encrypted disk after the failure has been resolved. Do you have the capability to do this?

- Yes – We can do this without engaging external resources. (Go to 14A)
- Yes – We can do this but need to engage external resources (Go to 14A)
- No – We cannot meet this requirement.

14a. LPL requires that all uncaptured email messages be submitted to LPL within a reasonable timeframe in order to quickly remediate any outstanding issues. How soon do you estimate you will be able to provide these messages?

15. Do you have a process in place to archive any email messages that are sent or received from your server? If yes, please provide details of this process.

15a. How often are the contents of the archive purged?

Part 4: Security and Encryption Information

16. For security purposes LPL can only accept journaled emails over a secure TLS (Transport Layer Security) connection that meets the National Institute of Standards and Technology (“NIST”) approved encryption algorithm, such as the Advanced Encryption Standard (“AES”) using a minimum 128-bit (preferred 256-bit) length encryption key. Can you ensure that all journaled email messages sent to LPL are sent over secure TLS connection that meets these guidelines?

Yes

No

16a. If your office uses an email encryption system to send and receive secure email to email recipients, can it comply with the LPL encryption requirements? (See below for LPL encryption requirements and answer the questions following).

Requirements:

- I. LPL Financial requires that journaling offices send LPL Financial all electronic communication in its original unmodified form. This includes all content of the electronic communication including: message body, message header and any attachments.
- II. Offices using their own email encryption technology must comply with LPL Financial’s data protection policies and must implement the email encryption technology so that it does not stop or interfere with the journaling of email to the LPL Archive.
- III. Any encryption solution may not interfere with the journaling function of the email server.
- IV. Messages that are encrypted must be journaled to LPL Financial in an unencrypted format over a secure connection.
- V. The journaling and encryption process must not destroy or modify the original content of the message.
- VI. Encrypted messages must be protected using a key cipher length of at least AES 256 bit.
- VII. Encrypted or password protect attachments are prohibited as they interfere with the supervision process.

Yes - My encryption method is in compliance with LPL requirements.

No - But I am able to comply with LPL's encryption requirements by the following date

Yes, we use encryption but it does not meet these requirements.

My office does not use email encryption (skip to Q 17).

I am unsure whether my encryption method is in compliance with LPL requirements

16b. What is the name of the email encryption product and unique key word you are using for email encryption? (Note: Office 365 Encryption does not meet LPL's requirements).

Name of Encryption Product	
Unique Keyword used to trigger encryption	

16c. Do you use a DLP (data loss prevention) system to scan and automatically encrypt emails containing sensitive information?

Yes

No

16d. As part of the email supervision process, LPL may routinely require your organization to provide LPL with supporting evidence that email messages containing customer PII sent by LPL associated persons through your email system were sent securely. Can you meet this requirement?

Yes

No

16e. Upon the completion of the journaling set up process, LPL will conduct a controlled test of your email encryption system to ensure that it is in compliance with LPL's guidelines. On-going testing may also be required to ensure the encryption system continues to remain in compliance. If the email encryption system is found to not be in compliance with LPL's guidelines at any time LPL will require it not be used by associated persons until any issue are resolved. Additionally, your organization will be required to report any encryption product or configuration changes which may impact your encryption system's ability to meet LPL's requirements.

Yes

No

Part 5: Miscellaneous information

17. Does your organization use any instant messaging/chat tools?

Yes

No

18. If yes: LPL policy prohibits instant message/chat tools to be installed on any electronic device (PC/Mac, Smartphone, Tablets etc.) used for LPL business. If these tools cannot be uninstalled, then any instant messaging/chat features should be disabled.

Can you comply with these requirements?

- We can remove these tools from any electronic device issued to LPL associated persons.
- We cannot remove these tools, but we can ensure any instant messaging/chat functions are disabled on any device issued to LPL associated persons.
- We cannot remove or disable chat tools on devices issued to LPL associated persons.

19. Please provide the contact information for the individual who completed this questionnaire

Name	
Title	
Email Address	
Phone Number	
Company Name	

Section 2: Business Acknowledgement

This section should be completed by the practice Journaling Attester

All email addresses must be reported to LPL, either by submitting a **RE-BNEMAIL-J form**, or by entering the email address in the LPL Journaling Attestation tool.

Any email address found to be in use by LPL associated persons, which have not been configured to journal, or were not reported to LPL prior to being used for LPL business will be considered unapproved email, and may be subject to disciplinary action.

An attestation is also required of me at least every 90 days, certifying that all of the email addresses in use by LPL associated persons have been reported.

1. Do you understand, and agree to these requirements?

- YES
- NO
- I am unsure/have questions

2. I understand that LPL requires that journaling attestors be able to ensure that their technology provider is able to resolve journaling issues in their email environment, and makes a best effort to remediate any journaling issues. I also understand that my practice is required to pay any costs associated with the setup of journaling, or the remediation of a journaling failure.

- YES
- NO
- I am unsure/have questions

3. I understand that LPL has an extremely limited ability to troubleshoot journaling issues within my email environment, and it is my responsibility to engage technical resources to resolve any journaling issues, upon being notified by LPL.

- YES
- NO
- I am unsure/have questions

4. I understand that failure to establish or maintain journaling or meet LPL's journaling requirements may result in suspension of journal privileges.

- YES
- NO
- I am unsure/have questions

Thank you for completing the questionnaire. Please return this survey to LPL at LPLfinancial.grcemailteam@lpl.com. You will be contacted if any additional information is needed.