

COMPLIANCE FRAMEWORK AND SOLUTIONS

The Savvy Investor platform has been designed and optimized to allow investment professionals around the world to share knowledge and build relationships with Institutional Investors, whilst maintaining compliance with regulatory requirements. This includes both:

- **Data Protection Compliance**, e.g. Europe's General Data Protection Regulation (GDPR)
- **Investment Compliance**, e.g. relating to SEC/FINRA in the United States and the UK's FCA.

For details of our Data Protection Framework, as it relates to the processing and sharing of personal data with our partners, please refer to our [Data Protection and GDPR Framework](#) document.

Key Investment Compliance issues at a glance

Membership (p2)

Membership of the site is restricted to verified Institutional Investors and their service providers. Non-members can view content listings but cannot access the substance of member posts or papers.

Company Manager, employee permissions and content ownership (p3)

Each company has a "Company Manager" (CM) who controls the company's use of Savvy Investor. Initially, the CM is the person who registers the Company on the site. Thereafter, this role may be assigned to one or more responsible persons. The CM determines which employees may write content in the company name. All content written in the company name is owned by the company.

Record keeping (p5)

The CM may receive by email a periodic PDF detailing all written activity of their employees. The CM may also access at any time a PDF for any employee, detailing their written activity on the site.

Editing and deleting (p4)

Posts written in the company name may be edited or deleted, at any time, by any employee with appropriate permissions. The PDF records referred to above will include all edits made to posts.

Regulatory disclaimers (p6)

Company Managers may write a customized disclaimer, approved by the company's Compliance Officer, to appear at the end of all posts written in the company name.

Geographic targeting (p7)

Companies may elect for any or all of their papers to be accessible only by members in selected countries. For members not within the permitted countries, these papers are hidden from view.

Testimonials and endorsements (p7)

We do not allow members to comment on papers. This removes the risk of "testimonials" and "endorsements" which are prohibited by regulators in certain jurisdictions.

Introduction

Savvy Investor is the world’s leading platform for the distribution of white papers to the Institutional Investment industry. Over 20,000 white papers are downloaded by our members monthly – far more than any competing platform. Compared to broadly-based professional networks, the content is more relevant, the community better targeted and the compliance framework is more appropriate.

Our compliance framework is designed to cater for the needs of institutional investors, investment marketers and other service providers all over the world.

The following pages cover the key issues of concern to compliance officers. If you require further detail on any of these issues, please contact us by email using legal@savvyinvestor.net.

Terms of membership

The Savvy Investor site exists solely as a platform for institutional investors to connect and share knowledge, information and opinions. Content must be professional and objective, not explicitly promoting a company or its products. Posts are monitored, and removed if in breach of guidelines.

The site is not regulated by any regulatory body. Under the terms of the User Agreement, the content of the site does not constitute tax, legal, insurance or investment advice. Content contributors are themselves responsible for ensuring that any content submitted to the website complies with all applicable laws, rules and regulations. Members are advised to seek independent professional advice in relation to any financial product or service that is discussed on the site.

Under the Terms of Agreement, users acknowledge that those who publish content have no obligations towards them, and waive any claim they may have against any user who publishes content on the site. The User Agreement is set out in full on the website.

Membership and verification

Membership of the site is available only to Institutional Investors and their service providers. Members are required to register using their professional (company) email address, which is then verified.

I have read, understood and agree to the [User Agreement](#) and [Privacy Policy](#)

By registering, you confirm that you have registered in your true identity and that you are an institutional investor, or an investment professional providing services to the institutional investment industry.

REGISTER

In order to write content as an employee of their company, an employee must receive further verification and approval from the “Company Manager” (see next page).

Company Managers and the posting of content

Each company has one (or preferably more) **Company Managers** who oversee and control the company's use of the site. These will normally be representatives from the company's Marketing department. The primary role of the Company Manager(s) is to manage the company profile, to set permission levels for each employee, and to fulfil the company's regulatory requirements.





Most Partners of Savvy Investor ask us to post content on their behalf, either by monitoring their site on a daily basis, or on an ad hoc basis as requested. However, companies may also post, edit (or delete) their own content if they prefer.

Designation of employee roles and permissions

An employee is only able to post content in the name of their company if they have been verified and approved as a "Company Writer" by the Company Manager. The designated Company Manager controls which of the company employees may post content in the company name.

Employee permissions

Check the boxes as appropriate to set employee permissions.

Name	Manager	Writer	Employee	Ex-employee	Join date
 Sush Willis , Compliance Officer Kim Asset Management, New York	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	22 Apr 2014
 Julie Ander , VP Marketing Kim Asset Management, Toronto	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	04 Feb 2014
 Kim Marshall , Equity Analyst Kim Asset Management, Sydney	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	22 Jul 2013
 Matt Smith , VP, New Media Kim Asset Management, London	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	22 Jul 2013

[Save changes](#)

Permission levels

Company managers: Manage company permissions and employee requests. May post content and edit company details.

Company writers: May post content in the name of the company.

Employees: Named on the website as employees but with no rights to publish in the company name.

Ex-employees: To remove employees from the company listing, simply tick the ex-employee box.

Ownership of content posted in the name of the company

All content posted in the company name is "owned" by the company (not by the employee) and may be edited or deleted by any company employee who is approved as a "company writer" or "company manager". When an employee leaves the company and is registered as an ex-employee, they lose editing rights over content that they authored in the company name. This allows companies to maintain permanent control over their content. The Company Profile may be edited only by a Company Manager.

Recordkeeping

The Company Manager may, at any time and on-demand, access an archive containing a full historical and chronological record of the activity on the site of any employee within their company. This includes all published content or messages, including any edits and amendments made. The archive includes the history of activity by the employee from the time they first registered on the site, even if the Company itself did not register on the site until later. These reports include any content since deleted.

Company Managers may also opt to receive a periodic email containing a file with the activity of all verified employees during the period. You may opt to receive this daily, weekly, monthly or not at all, depending upon your compliance requirements.


Employee archives

Request file with employee activity

daily
 weekly
 monthly
 not required


Clicking on "archive" for any employee will provide you with a full historical and chronological record of a user's activity on the site, including all published content, small talk, messages, comments, questions/answers, and any edits and amendments made. It is not expected that this will be needed often, but is provided in order for certain users to satisfy the requirements of their regulatory authorities.

If you wish to file these records yourself, you may opt for your Company Managers to receive a periodic email containing a file with the activity of all of your registered employees during the period.




Matt Smith, VP, New Media, Kim Asset Management
London, UK - Asset management

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[Save profile](#)
[Flag](#)
[Connected](#)




Kim Marshall, Equity Analyst, Kim Asset Management
Sydney, Australia - Unclassified other

[Archive](#)
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[Unfollow](#)
[Save profile](#)
[Flag](#)
[Connected](#)



Julie Ander, VP Marketing, Kim Asset Management
Toronto, Canada - Asset management

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[Save profile](#)
[Flag](#)
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Sush Willis, Compliance Officer, Kim Asset Management
New York, Armenia - Asset management

[Archive](#)

Regulatory Disclaimers

Some companies will need to make mandatory regulatory disclaimers at the end of their posts. Company Managers have the option to write a customised disclaimer, approved by their Compliance Officer, which will appear at the end of all posts written in the company name.

The disclaimer you provide will automatically be visible to Company Writers when they write content in the company name. It will be displayed immediately below the article content.

Geographic Targeting

Companies may elect for any (or all) of their papers to be accessible only by members in selected countries. For members not within the permitted countries, these papers are hidden from view (both on the website and in our newsletters).

Country selection (the countries in which members may view your content) may be made on either an exclusion basis (e.g. all countries except USA and Canada) or on an inclusion basis (e.g. allow Australia and New Zealand only).

The default selection is that all posts should be accessible to all members. To implement geographic targeting on your content, please contact business@savvyinvestor.net.

Testimonials or endorsements

We do not allow members to comment on member posts or papers. This removes the risk of “testimonials” and “endorsements” which are prohibited by regulators in certain jurisdictions.

Furthermore, members do not have the opportunity to comment on Company Profiles or Personal Profiles.

To contact us

If you have particular compliance requirements in your jurisdiction, which prevent you from using the site effectively, please contact us using legal@savvyinvestor.net.

Our aim is to allow institutional investors and investment management professionals around the world to self-publish and to use our knowledge network in a compliant fashion.

Please let us know if you have any issues. We are not aware of any company which has taken the decision not to use the network on compliance grounds.

Our disclaimer

Use of Savvy Investor does not constitute compliance with all applicable regulations and all content submitted must be written in compliance with the regulations applying to each user. Different regulations apply in different jurisdictions and all users should consult their own legal advisors. These notes do not represent legal or compliance advice.