

EXHIBIT

Three Questions to Address to Minimize Improper Release of Proprietary Client Information

Question 1: Who has access to proprietary client information?

- Identify all firm personnel with access to proprietary client information.
- Consider a risk-based approach when evaluating access controls.

Question 2: What are the guidelines for retaining proprietary client information?

- Ensure that document-retention policies include specific guidelines for protecting proprietary client information.
- Require all firm personnel to sign an affidavit stating they have read and understand the document-retention policies involving proprietary information.
- Train appropriate firm personnel in how to properly archive or dispose of such information.
- Consider the construction of “Chinese walls” between firm personnel involved with clients within the same industry, especially when the information is sensitive.

Question 3: To whom may proprietary client information be distributed?

- Promote awareness of the appropriate procedures to follow when disclosing proprietary client information to internal and to external parties.
- Ensure that all personnel understand state regulations and the AICPA Rules of Professional Conduct.
- Limit access to both paper and electronic proprietary client information through formal check-in and check-out procedures.