

# Audit Report

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**Title:** Aud0117\_SecurityImplementation

**Date:** 2025-01-17 - 2025-01-20

**Auditor:** AM AM

**Auditee:** CCO CCO

**Status:** Remediation In Progress

## ① Planning

1. Do you use Advice America by Fiserv (formerly AdvisorVision)?

☒Yes ☐No ☐I don't Know

1.1. If so where are they stored?

☐Cloud ☒Desktop ☐Local Server

1.2. What Access Method is used?

☐Direct ☒Through Custodian Portal

1.3. Is MFA used to access this service?

☐Yes ☒No ☐I don't Know

### Comment:

AM AM(2025-01-17)

Enter your note AM

### Attachment:

AM AM(2025-01-17)

Fusion1-QuestionnaireTemplate (1).xlsx

### Attachment:

AM AM(2025-01-17)

Aud01 (1).pdf

### Attachment:

AM AM(2025-01-17)

Aud0109 NS.pdf

### Attachment:

AM AM(2025-01-17)

Audit AML (2).pdf

### Attachment:

AM AM(2025-01-17)

Audit0106\_1.pdf

**Attachment:**

AM AM(2025-01-17)

Audit0107\_AntiMoneyLaundryEdit (1).pdf

**Attachment:**

AM AM(2025-01-17)

Audit AML (1).pdf

**Attachment:**

AM AM(2025-01-17)

AuditReport\_20250106\_072854.csv

**Attachment:**

AM AM(2025-01-17)

AuditReport\_20250106\_072854.pdf

**Comment:**

AM AM(2025-01-20)

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**Comment:**

AM AM(2025-01-20)

public notes am

1.4. Please list all users of this service:

qnsrwer

2. Do you use Advisys® (formerly Kettley/ Backroom Technician)?

☐Yes ☒No ☐I don't Know

3. Do you use clearPath by BetaVest?

☒Yes ☐No ☐I don't Know

5. Do you use eMoney?

☐Yes ☒No ☐I don't Know

6. Do you use Financial Planning Professional/FPP by Lumen Systems?

☒Yes ☐No ☐I don't Know

7. Do you use goalgamiPro by ASI - Advisor Software?

☒Yes ☐No ☐I don't Know

8. Do you use Hanlon Planning Solutions by Hanlon Advisory Software/HAS (formerly IAS/Solution 360)?

☒Yes ☐No ☐I don't Know

9. Do you use MoneyGuide Pro?



☐Yes ☒No ☐I don't Know

10. Do you use Money Tree?

☒Yes ☐No ☐I don't Know

11. Do you use NaviPlan by Advicent?

☐Yes ☒No ☐I don't Know

12. Do you use Profiles (formerly Financial Profiles) by Advicent?

☐Yes ☒No ☐I don't Know

13. Do you use RetireUp?

☐Yes ☒No ☐I don't Know

14. Do you use Right Capital?

☒Yes ☐No ☐I don't Know

15. Do you use Your Broker Dealer's Planning tool?

☐Yes ☒No ☐I don't Know

## 2 CRM

1. Do you use Salesforce?

☐Yes ☒No ☐I don't Know

1.1. If so where are they stored?

☐Cloud ☐Desktop ☐Local Server

1.2. What Access Method is used?

☐Direct ☐Through Custodian Portal

1.3. Is MFA used to access this service?

☐Yes ☐No ☐I don't Know

1.4. Please list all users of this service:

3. Do you use Red Tail?

☐Yes ☒No ☐I don't Know

4. Do you use Smart Office (Ebix)?

☐Yes ☒No ☐I don't Know

5. Do you use Junxure?

☐Yes ☒No ☐I don't Know

6. Do you use Gold Mine?

☐Yes ☒No ☐I don't Know

7. Do you use Gorilla?

☒Yes ☐No ☐I don't Know

8. Do you use Wealthbox?

☐Yes ☒No ☐I don't Know

9. Do you use ACT?

☐Yes ☒No ☐I don't Know

10. Do you use Advisor Assistant?

☐Yes ☒No ☐I don't Know

11. Do you use HubSpot?

☐Yes ☒No ☐I don't Know

12. Do you use UGRU Financial?

☐Yes ☒No ☐I don't Know

13. Do you use Your Broker Dealer?

☐Yes ☒No ☐I don't Know

### 3 Management & Reporting

1. Do you use MorningStar Office?

☐Yes ☒No ☐I don't Know

1.1. If so where are they stored?

☐Cloud ☐Desktop ☐Local Server

1.2. What Access Method is used?

☐Direct ☐Through Custodian Portal

1.3. Is MFA used to access this service?

☐Yes ☐No ☐I don't Know

1.4. Please list all users of this service:

2. Do you use Black Diamond?

☐Yes ☒No ☐I don't Know

3. Do you use Orion?

☐Yes ☒No ☐I don't Know

4. Do you use Envestnet / Tamarac?

☒Yes ☐No ☐I don't Know

5. Do you use Addepar?

☐Yes ☒No ☐I don't Know

6. Do you use Your Broker Dealer?

☐Yes ☒No ☐I don't Know

### 4 Document Storage

1. Do you use Docupace?

☐Yes ☒No ☐I don't Know

1.1. If so where are they stored?

☐Cloud ☐Desktop ☐Local Server

1.2. What Access Method is used?

☐Direct ☐Through Custodian Portal

1.3. Is MFA used to access this service?

☐Yes ☐No ☐I don't Know

1.4. Please list all users of this service:

2. Do you use Box?

☐ Yes ☒ **No** ☐ I don't Know

3. Do you use Citrix Sharefile?

☐ Yes ☒ **No** ☐ I don't Know

4. Do you use Dropbox?

☐ Yes ☒ **No** ☐ I don't Know

5. Do you use Laserfiche?

☐Yes ☒No ☐I don't Know

6. Do you use Redtail?

☐Yes ☒No ☐I don't Know

7. Do you use Microsoft OneDrive?

☐Yes ☒No ☐I don't Know

8. Do you use Your Broker Dealer?

☐Yes ☒No ☐I don't Know

## 5 Rebalancing

1. Do you use iRebal?

☐Yes ☒No ☐I don't Know

1.1. If so where are they stored?

☐Cloud ☐Desktop ☐Local Server

1.2. What Access Method is used?

☐Direct ☐Through Custodian Portal

1.3. Is MFA used to access this service?

☐Yes ☐No ☐I don't Know

1.4. Please list all users of this service:

2. Do you use Envestnet / Tamarac?

☐Yes ☒No ☐I don't Know

3. Do you use Orion?

☐Yes ☒No ☐I don't Know

4. Do you use Black Diamond?

☐Yes ☒No ☐I don't Know

5. Do you use Morningstar TRX?

☐Yes ☒No ☐I don't Know

6. Do you use Your Broker Dealer?

☐Yes ☒No ☐I don't Know

## 6 Account Aggregation

1. Do you use eMoney?

☐Yes ☒No ☐I don't Know

1.1. If so where are they stored?

☐Cloud ☐Desktop ☐Local Server

1.2. What Access Method is used?



12. What access method is used?

☐ Direct    ☐ Through Custodian Portal

1.3. Is MFA used to access this service?

☐ Yes    ☐ No    ☐ I don't Know

1.4. Please list all users of this service:

2. Do you use Morningstall ByAllAccounts?

☐ Yes    ☒ No    ☐ I don't Know

3. Do you use Envestnet / Yodlee?

☐Yes ☒No ☐I don't Know

4. Do you use Plair / Quovo?

☐Yes ☒No ☐I don't Know

5. Do you use Intuit?

☐Yes ☒No ☐I don't Know

6. Do you use Broadridge/Investigo?

☐Yes ☒No ☐I don't Know

7. Do you use Your Broker Dealer?

☐Yes ☒No ☐I don't Know

## 7 Custodian

1. Do you use TD Ameritrade?

☒Yes ☐No ☐I don't Know

1.1. If so where are they stored?

☒Cloud ☐Desktop ☐Local Server

1.2. What Access Method is used?

☐Direct ☒Through Custodian Portal

1.3. Is MFA used to access this service?

☒Yes ☐No ☐I don't Know

1.4. Please list all users of this service:

qns wer

2. Do you use Schwab?

☐Yes ☒No ☐I don't Know

3. Do you use Fidelity?

☐Yes ☒No ☐I don't Know

4. Do you use Pershing / BNY Mellon ?

☐Yes ☒No ☐I don't Know

5. Do you use SEI?

☐Yes ☒No ☐I don't Know

6. Do you use E-Trade Advisor?

☐Yes ☒No ☐I don't Know

7. Do you use Folio Institutional?

☐Yes ☒No ☐I don't Know

8. Do you use Your Broker Dealer?

☐Yes ☒No ☐I don't Know

8 Password Manager

1. Do you use LastPass?

☒Yes ☐No ☐I don't Know

1.1. If so where are they stored?

☒Cloud ☐Desktop ☐Local Server

1.2. What Access Method is used?

☐Direct ☒Through Custodian Portal

1.3. Is MFA used to access this service?

☐Yes ☒No ☐I don't Know

1.4. Please list all users of this service:

qnsr

2. Do you use Dashlane?

☐Yes ☒No ☐I don't Know

3. Do you use RoboForm?

☐Yes ☒No ☐I don't Know

4. Do you use 1Password?

☐Yes ☒No ☐I don't Know

5. Do you use Keeper?

☐Yes ☒No ☐I don't Know

6. Do you use Excel/Word?

☐Yes ☒No ☐I don't Know

9 Email Host /Archiving

1. Do you use Microsoft Office365?

☐Yes ☒No ☐I don't Know

1.1. If so where are they stored?

☐Cloud ☐Desktop ☐Local Server

1.2. What Access Method is used?

☐Direct ☐Through Custodian Portal

1.3. Is MFA used to access this service?

☐Yes ☐No ☐I don't Know

1.4. Please list all users of this service:

2. Do you use Google?

☐Yes ☒No ☐I don't Know

3. Do you use Smarsh?

☐Yes ☒No ☐I don't Know

4. Do you use Global Relay?

☐Yes ☒No ☐I don't Know

5. Do you use TwentyOverTen?

☐Yes ☐No ☒I don't Know

6. Do you use Your Broker Dealer?

☐ Yes    ☐ No    ☒ **I don't Know**

**10 Product Sponsors / Third Party Money Mangers with PII**

1. Do you utilize any product sponsors, third party money managers that have access to PII data?

☒ **Yes**    ☐ No    ☐ I don't Know

1.1. Please list the name of this vendor

qnsr

1.2. Is this vendor accessed via your BD or Custodian portal?

☒Yes ☐No ☐I don't Know

1.3. Is this access directly with PII visible?

☐Yes ☒No ☐I don't Know

1.5. Is 2FA aka Multi Factor available for this vendor?

☐Yes ☒No ☐I don't Know

1.5.1. If yes, is 2FA enabled for this vendor?

☐Yes ☐No ☐I don't Know

1.6. Please list all users of this service:

qnsr

1.7. Do you utilize any other product sponsors, third party money managers that have access to PII data?

☒Yes ☐No ☐I don't Know

2. Do you scan any documents?

☐Yes ☒No ☐I don't Know

2.1. If so where are they stored?

3. Do you have a printer, copier or scanner capable of document storage?

☐Yes ☒No ☐I don't Know

3.1. Do you store any documents directly on the device with PII?

qnsr

3.2. Is the storage on the device encrypted??

qnsr

4. Do you use any Contact anagement System (CMS) not captured above?

☒Yes ☐No ☐I don't Know

4.1. Does the CMS have PII?

☐Yes ☒No ☐I don't Know

5. Do you store the date of birth for your clients or staff for birthday cards or reminders for RMD's or insurance renewal purposes?

☐Yes ☒No ☐I don't Know

5.1. Please list the location(s) where this PII is stored.

qnsr

6. When you get a new client, do you enter PII into any systems we've not catalogued?

☒ Yes    ☐ No    ☐ I don't Know

7. Do you have a server or NAS (Network Storage Device)?

☐Yes ☒No ☐I don't Know

7.1. Is there any PII stored on this/these server(s) that's not been catalogued yet?

☒Yes ☐No ☐I don't Know

7.1.1. Please Describe

qnsr

7.1.2. How do you back it up?

qnsr

8. Do you have any software you developed or had developed that you use in your business?

☐Yes ☒No ☐I don't Know

8.1. Does it contain PII?

☒Yes ☐No ☐I don't Know

9. Do you use any workflow tools such as Process Street, Monday.com or Asana?

☒Yes ☐No ☐I don't Know

9.1. Please list these systems

qnsr

10. Do you use API automation tools such as Zapier or ifttt?

☐Yes ☒No ☐I don't Know

11. Do you utilize the "Vault" feature in eMoney, Redtail or other system ?

☐Yes ☒No ☐I don't Know

11.1. Do you store PII for or about clients in these locations?

☐Yes ☒No ☐I don't Know

12. Do you have any old systems you no longer put new data in but keep around to access the old Data?

☐Yes ☒No ☐I don't Know

12.1. Is the data encrypted?

☒Yes ☐No ☐I don't Know

13. Do you have old computers sitting around which may have PII on them that you don't know what to do with?

☒Yes ☐No ☐I don't Know

13.1. Are ALL of these computers encrypted?

☐Yes ☒No ☐I don't Know

14. Which of these processes do you implement for equipment you are taking out of service?



- ☒ Which of these processes do you implement for equipment you are taking out of service?
- ☐ We have the hard drives removed and destroyed and get a certificate of destruction
- ☐ We have the hard drives removed and destroyed and DO NOT get a certificate of destruction
- ☐ We execute a DOD wipe on all devices before they are retired
- ☐ I don't know

15. Do you share office space with any other businesses?

☒Yes ☐No ☐I don't Know

16. Are you in a multitenant building where the Internet service is provided or shared?

☐Yes ☒No ☐I don't Know

17. Do you share a CRM or other database with any other affiliated entity? E.g. Tax Practice, Insurance

☐Yes ☒No ☐I don't Know

18. Do you have any affiliated entities which need to be considered by your security program? E.g. CPA/Tax Prep

☒Yes ☐No ☐I don't Know

19. Do you use wireless internet access in your office?

☒Yes ☐No ☐I don't Know

19.1. Do you make Internet access available to clients, wholesalers or others?

☐Yes ☒No ☐I don't Know

19.1.1. If yes, is it segmented in some way?

☐Yes ☐No ☐I don't Know

20. Do you have a static or dynamic public IP address?

☒Static ☐Dynamic ☐Both ☐I don't Know

20.1. If static, please list in Notes.

qnsr

21. Do you have a firewall or router other than the one provided by your Internet Service Provider (ISP)?

☐Yes ☒No ☐I don't Know

21.1. If yes, who supports it?

22. Do you have an IT organization you work with?

☐Yes ☒No ☐I don't Know

22.1. Who supports your computers?

qnsr

22.2. Does your local IT group store any data or back ups for you?

☒Yes ☐No ☐I don't Know

22.3. Do they host any servers or other equipment for you?

☒Yes ☐No ☐I don't Know

22.4. Does your IT organization remote into your computer is to address issues or for maintenance?



☐Yes ☒No ☐I don't Know

22.4.1. Do you need to be at the computer to accept the connection?

☐Yes ☒No ☐I don't Know

23. Do you ever access systems which contain PII from public Wi-Fi like at a hotel? Do you use a hotspot or VPN? If so, please list in notes.

☐Yes ☒No ☐I don't Know

23.1. Please describe in detail

24. Do you access any of your computers, servers, or printer/copier devices from outside the office?

☐Yes ☒No ☐I don't Know

25. Do you have any satellite offices?

☐Yes ☒No ☐I don't Know

26. Do you use USB thumb or hard drives to store PII data?

☒Yes ☐No ☐I don't Know

27. Do you transport PII data on drives between different locations, including your home or bank lock box?

☒Yes ☐No ☐I don't Know

28. Do you back up any of your data?

☒Yes ☐No ☐I don't Know

28.1. Please describe how/what system you use to back up your data

qns wer

28.2. Is there any PII those back ups?

☒Yes ☐No ☐I don't Know

28.3. Is any of this backup data stored in the cloud?

☒Yes ☐No ☐I don't Know

28.3.1. Do you have Multi-Factor Authentication turned on?

☐Yes ☒No ☐I don't Know

29. Do you have any staff that share one?

☐Yes ☒No ☐I don't Know

29.1. Please describe

qns wer

30. Do you allow staff to use their personal/smart phones for business purposes?

☐Yes ☒No ☐I don't Know

30.1. if no, do they use their personal computers?

☐Yes ☒No ☐I don't Know

31. Do you have any remote staff? If so, list in notes.

☐ Yes    ☒ **No**    ☐ I don't Know

32. Where do you store employee/contractor information like Social Security number?

qnsr

33. How do you process payroll?

qnsr

34. Where do you store tax documents like W-2s and 1099's?

qnsr

35. Where do you store your personal / corporate tax returns or other tax documents?

qnsr

36. Where do you store any other critical business related documents?

qnsr

37. Do you use Voice over IP (VOIP) phones or phone system?

☐Yes ☒No ☐I don't Know

38. Who hosts your email? (Examples: Microsoft, Intermedia, Redtail, Google)

qnsr

39. Is multi-factor authentication enabled on all the email accounts?

☒Yes ☐No ☐I don't Know

40. Do you utilize an email encryption service such as Smarsh or Microsoft?

☒Yes ☐No ☐I don't Know

41. Do you use any email marketing automation tools like MailChimp or Constant Contact?

☒Yes ☐No ☐I don't Know

42. Does your staff receive periodic Security Awareness Training?

☐Yes ☒No ☐I don't Know

42.1. What system/vendor do you use?

qnsr

43. Does your staff receive periodic Phishing Simulation emails?

☒Yes ☐No ☐I don't Know

44. Are you required to have specific software installed on your computers by any of your business partners?

☐Yes ☒No ☐I don't Know

45. Do you have a written incident response plan?

☒Yes ☐No ☐I don't Know

45.1. If so, who is the contact person within the organization to execute the plan?

qnswer

46. Do you have cyber insurance?

☒ **Yes**    ☐ No    ☐ I don't Know

46.1. If yes, is there any guidance provided on how / when to report a possible incident?

☐ Yes    ☒ **No**    ☐ I don't Know

47. Is anyone registered in the State of New York to sell Life Insurance?

☐ Yes    ☐ No    ☒ **I don't Know**

47.1. If yes, have you filed for an exemption to 23 NYCRR 500 - CYBERSECURITY REQUIREMENTS FOR FINANCIAL SERVICES COMPANIES?

☐ Yes    ☐ No    ☐ I don't Know

