

Project Canvas – Marketing – Social Media Listening and Customer Look-a-like Process CCA

About the Business:

Business Objective: Under the leadership of Richard Parkinson's Chief Brand Office, the ABC Company Marketing Social Media team is led by David Hamlett within the broader Social-Media and Sponsorships function. The team is primarily responsible for publishing approved content for each of the U.S. lines of business (e.g., ILI, Retirement Strategies, Group Insurance, RAS) and OGIM brand-level accounts (e.g., @OGIM Fixed Income, OGIM Real Estate, etc.) to various social media platforms (e.g., Facebook, LinkedIn, Instagram, X) in accordance with established company policies and guiding frameworks. The function also maintains responsibility for the monitoring of social media platform user accounts for customer comments, including service-related comments and/or complaints, as well as for general mentions (e.g., @ABC Company).

Additionally, a separate team under Richard Parkinson, led by Kalli Chapman, is responsible for Paid Media Advertising. This team handles the Social Media Customer Look-a-like process where existing customer information is shared with third parties to identify potential customer groups who are likely to be interested in ABC Company products/services because they share similar characteristics to existing customers.

Key Risks:

- 12.3.1 – Product, Operations, and Trading – Customer Service/Escalation – Customer Complaints – Risk that customer comments, service-related questions and/or complaints are not identified and escalated to the appropriate internal parties for tracking and resolution.
- 10.5.3 – Regulatory Compliance – Misleading Communications and Marketing Materials – Risk that social media marketing materials or post content are not reviewed and released in accordance with procedure.
- 14.9.1 – People and Governance – Governance and Risk Management – Risk of key governance documents and operating procedures being outdated and/or incomplete.
- 8.1.1 – Information Security – Unauthorized Data Access – Risk that inappropriate access is obtained to key platforms including Sprinklr and LiveRamp, permitting unauthorized updates or posts of social media content.
- 8.2.1 – Information Security – Inadvertent Data Exposure – Risk that non-public customer data is inadvertently made publicly available or exposed to an incorrect recipient.

Key Systems/or End User Computing Solutions (EUCS) used:

- **Sprinklr** – Sprinklr is a software as a service dashboard used to push content to applicable social media platforms. Additionally, Sprinklr is the primary tool used for the social listening program, supporting the tracking and triage of comments received from customers, including comments specific to customer complaints.
- **LiveRamp** – Middleware vendor that hashes and anonymizes ABC Company customer data prior to sharing with third parties (e.g., Facebook, Google) to create look-alike audiences.

Key Regulations:

- **FINRA Rule 2210:** Communications with the Public (Broker Dealer only)
- **FINRA Rule 2211:** Communications with the Public About Variable Life Insurance and Variable Annuities (Broker Dealer only)
- **SEC Rule 206(4)-1:** SEC Marketing Rule (This only applies to registered investment advisors (RIA)).
- **NAIC 570-1** – Advertising of Insurance and Annuities Model Regulation

Enterprise Issues that Influence Process Under Review/Management Areas of Concern:

- No enterprise issues that influence processes under review and/or Management areas of concern noted.

Value Proposition:

- The engagement will evaluate the design and effectiveness of the social media framework and internal controls related to ensuring that customer comments and/or service requests received via social media are aggregated and dispositioned appropriately, completely, and accurately, as well as the accuracy and completeness of post content released. The engagement will also evaluate the design and effectiveness of the information security controls related to systems access and the customer data upload process within LiveRamp which is a new vendor.

Cross-Functional Impact

- **ES Customer Service and Complaints Handling (e.g., Contact Centers, Back-Office Operations)** – Service-related customer comments and/or complaints received by the Social Media team are initially triaged and then shared with the ES Customer Advocacy & Insights Team for formal tracking and resolution with the support of the broader ES Customer Service organization.
- **US Businesses** – U.S. lines of businesses (e.g., ILI, Retirement Strategies, Group Insurance, RAS) rely on the Social Media teams to help drive brand awareness and drive sales growth.

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Metrics and Monitoring Reporting

Full-Year Ending 12/31/23:

- Social Media Listening (General Mentions and Service-Related Cases): 12,047
 - 45.65% (5,499) Facebook
 - 29.86% (3,597) Twitter (X)
 - 15.02% (1,810) Instagram
 - 9.47% (1,141) LinkedIn
- Number of Social Content Publishes: 565
- Number of Social Content Engages (likes, comments, shares, retweets, etc.): 101,116

Brand Handle Followers (as of 12/31/23)	
Facebook	559,160
LinkedIn	326,050
Twitter (X)	145,040
Instagram	33,160

Fraud Considerations/Scenarios

The IA team conducted a Fraud Brainstorming session on January 16, 2024, to determine if any areas of the entity under review are susceptible to a heightened risk of fraud. The following fraud scenarios were discussed:

- A malicious insider/outsider may have unauthorized and/or inappropriate social media system access and commit fraudulent activities by obtaining customer PII, submitting fraudulent transactions, disclosing confidential information, market false information, or damaging ABC Company associates and/or brand reputation and cause Enterprise repercussions. *This will be tested through the system access controls testing for the various systems (Sprinklr & LiveRamp).*
- The Marketing team adjusts/removes/reduces the social media response/mentions of complaints to overinflate positive feedback to make ABC Company/the Marketing team look better. *This will be tested through the Sprinklr case monitoring control testing.*
- For lookalike audience creation, LiveRamp and/or the third-party receiving ABC Company's customer data shares/sells it. *This will be tested through the look-a-like data transmission control testing.*

Project Scope Details

Scope Period: 12/1/2022 – 11/30/2023

This is a Control Condition Assessment, and the following areas are in scope:

- **Product, Operations, and Trading (12.3.1)**
 - *Customer Service/Escalation and Monitoring* – Verify adequate monitoring and escalation controls are in place regarding customer comments, complaints, and service requests (as an input to centralized complaint handling process within ES).
 - *Monitoring Reports* – Assess managements monitoring controls over social media content.
- **Regulatory Compliance (10.5.3)**
 - *Misleading Communications and Marketing Materials* – Validate that Marketing Materials presented are not misleading and comply with applicable regulatory requirements.
- **People and Governance (14.9.1)**
 - *Governance and Risk Management* – Governance over Social-Media posting and monitoring, including the development and maintenance of key standard operating procedures (e.g., Social Media Operational Playbook).
- **Information Security (8.1.1 & 8.2.1)**
 - *Unauthorized Access to Systems (Sprinklr & LiveRamp)*
 - *Inadvertent Data Exposure* - Assess controls and operational frameworks in place to mitigate the risk of unauthorized data transfer (e.g., Facebook look-a-like), including hashing and uploading of customer data to vendors where applicable.

Project Scope Exclusions & Rationale

- *OGIM individually owned accounts are overseen by its own self-contained Social Media Program and Strategy under the leadership of Haley Rubin. OGIM individual accounts will be outside this review however, OGIM Affiliate brand-level accounts (e.g., OGIM Investments, OGIM Fixed Income, OGIM Real Estate, OGIM International, etc.) will be included in this review.*
- *AIQ and International social media programs are overseen by their own management team which fall outside of the scope of this function and will be excluded from this review.*

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Process	Population	Data Analytic Considerations	High Level Test Approach
Sprinklr monitoring and escalation process	<u>Population:</u> ~11k User Generated Content "UGC" cases <u>Sample:</u> 25 cases	Population analysis and strategic sampling; sampling to include cases in different status, social networks (i.e., Facebook, Instagram, Linked-In), priority, interaction count, and containing PII. Additionally focusing on identifying cases with words that show that the interaction may be a complaint.	For the selected samples of UGC cases, verify appropriate procedures were followed by the Customer Advocacy, Social Listening Insights team including timeliness and appropriateness of response and escalation to the business for further review when applicable. Additionally, independently validate instances where ABC Company handles were mentioned on social media and verify that the corresponding mention was picked up by the Sprinklr system. Additionally, perform testing over monitoring of outstanding open/aging cases for timeliness.
Social Media posts approval and monitoring	<u>Population:</u> 534 published social media posts <u>Sample:</u> 25 posts	Population analysis and strategic sampling; sampling to include posts from different social networks (i.e., Facebook, Instagram, Linked-In), authors, campaigns, and engagement (i.e., likes, comments, shares).	For the selected samples of Social Media Marketing posts, verify appropriate reviews and approvals were obtained prior to posting in accordance with the applicable procedure, and verify actions taken for any outliers identified during the period.* Additionally, independently validate posts from the various social media platforms were included in the Sprinklr post population. <i>*Note – Outcomes testing over the approval process within the Marketing Review Unit (MRU) will not be performed over these pieces as it would be subject to separate risk-based coverage and the pieces are largely templated.</i>
Governance of key Standard Operating Procedures "SOPs"	<u>Population:</u> Social Media Playbook <u>Sample:</u> Applicable SOP	N/A	Obtain the applicable Standard Operating Procedures SOPs (Social Media Operational Playbook). Assess the design of the Playbook/Framework and procedures to ensure that they appropriately address the process based on the walkthroughs and testing completed for the different social media controls.
System Access	<u>Sprinklr:</u> <u>Population:</u> 26 users	N/A	Through system generated reports or screenshots from the Sprinklr application and ensure that only social media team members have access and validate that social media accounts managed within the platform are reviewed periodically to ensure that only the appropriate users have access to such accounts.
	<u>LiveRamp</u> <u>Population:</u> 23 users	N/A	Through system generated reports or screenshots from the LiveRamp application, verify that access is restricted to required users within the Social Media team.
Secure Data Transmission Processes (Look-a-like)	<u>Population:</u> Data transmission method to LiveRamp <u>Sample:</u> 100% - Transmission Method	N/A	Verify transmission of SimplyTerm data from ABC Company to LiveRamp is secure. Verify SimplyTerm Data file containing PI is deleted from LiveRamp. Additionally, verify the vendor has procedures in place to effectively hash/anonymize data.
Look-a-like Audience Advertising & Quality Review	<u>Population:</u> 206 Look-a-like audience Advertisements <u>Sample:</u> 25	N/A	Verify that the materials advertised were subject to the appropriate level of review prior to release and validate that the content presented is not misleading and did not include any guarantees or promises of services. Additionally, perform a three-way match between the approved copy, copy included in the quality review hand-off document and the copy released on Facebook.