TRANSAMERICA
INSURANCE & INVESTMENT GROUP

General Agency Imaging Process

PaperClip Software

Introduction

Transamerica has the capability of accepting scanned electronic images from the agency when submitting New Business applications, Policy Service Request documents, and Contracting & Licensing paperwork to the Cedar Rapids Operations. This endeavor allows Transamerica to position itself as one of the leading Insurance Carriers with this capability.

General Agencies can utilize current imaging technology to streamline their agency workflow processes with Transamerica, and significantly reduce expenses associated with this process along with reducing "physical" document storage. Other significant benefits to the agency are quicker document processing, reduced costs for any overnight shipping, and ease of retrieval of electronic images.

This guide will give the Agency the step-by-step procedures that are to be followed when submitting scanned documents via the Image process for Transamerica. The procedures that are to be followed with regard to the actual Image process – hardware and software, scanning process, image transmitting and retrieval process are the sole responsibility between the agency and PaperClip Software.

Transamerica Imaging Process

Accepted Scanned Images

Transamerica will accept as part of the Agency Imaging Process New Business Life Applications – Term, UL, and VUL - and all associated documents – along with Inforce (POS/CS) paperwork that are currently processed by Transamerica-Cedar Rapids.

Business Area Processing

Transamerica has Business Area routing within the Cedar Rapids workflow for processing images from general agencies.

The Business Areas are as follows:

- **New Business/Underwriting NBU**
- **Policy/Customer Service CS**
- **Contracting/Licensing/Commissions CLC**

It is required that all documents be indexed with the correct Business Area in the NAILBA Index File. Failure to index documents with the correct Business Area indicator will cause documents to be routed to the improper Business Unit within CR, and will delay processing. Documents that are not indexed with the correct Business Area will fail, require a correction and retransmission with the correct Business Area and may create delays with processing.

Image Processing

The following steps will be required in order to process ALL New Business Life Applications through the Imaging Process with Transamerica:

- All New Business Life Applications must be input in the FastStart application process within TransACT or the Agency Management System FastStart Integration in order to receive a policy number.
- If agency utilizes an Agency Management System, the Transmittal Letter generated by the AMS should be printed and included as it contains the key information and indexing fields – Last Name, First Name, SS#, DOB, Policy #, Carrier ID, etc., and other pertinent information regarding the application.
- If agency does not utilize an Agency Management System, the Transmittal Letter in the FastStart application process within TransACT can be printed, and included with the imaged application.
- If agency does not include a transmittal page or coversheet containing the policy number with the image, then the policy number must be written or stamped on the top of each page. If a multi-page document or requirement, the policy number only needs to be written or stamped on the first page of the document
- Agency shall scan and index the New Business Fixed Life Applications and all associated documents/requirements according to the Transamerica Document Prep Order (See Document Prep Section) and the NAILBA Suggested Document Types for Imaging.
- All documents must be indexed with the correct Business Area (NBU, CS & CLC) in order to be routed to correct business area for processing.
- Each Application Document Type must be separated and indexed accordingly. All other documents must be separated under the correct NAILBA Doc Type.
- As other documentation and/or requirements are processed by the agency during the Underwriting Process of the NB Application, the same workflow as above is followed as

to placement of policy number on top of documentation/requirement, proper prepping per NAILBA Document types, and proper Business Area.

Once an application and all supporting documentation has been scanned, indexed and released to PaperClip Software for transmit to Transamerica-CR no further processing is required. Do not Fax or Mail the application and supporting documents to Cedar Rapids as it will result in duplication and errors in the Underwriting system. The agency shall follow the Record Retention Policy section.

NOTE: An agency utilizing the Imaging Process will not receive a Confirmation Batch ID# for applications submitted as is the current process with the NB Fax Server lines. Unless the agency receives specific instructions from Transamerica-CR New Business Operations, do not resubmit or retransmit any Image files, as it will result in duplication, possible errors, and delays in processing. It is the responsibility of the agency to perform daily audits of their transmission reports/logs for their respective system.

New Business Document Prep

In order for NB Operations-CR to process the submitted applications and supporting documents properly, the following **Document Prepping Order** is to be followed:

Fixed Life – Term and UL Document Prep
Transmittal or Cover Letter
Application * (1st Page, Authorization, and Report by Agency Office – if Short Form Application) (If Long Form Application all pages up to the Conditional Receipt should be included as the APPI document)
Conditional Receipt (NBFORM)
Check (CWA) – if received (See Cash with App Processing below)
PAC/Voided Check (if applicable)
Illustration

VUL Document Prep
Transmittal or Cover Letter
Wholesale Cover Letter (separated with Doc Type – CORRESP)
Application * (1st Page, Authorization, and Report by Agency Office – if Short Form Application) (If Long Form Application all pages up to the Conditional Receipt should be included as the APPI document)
Application Supplement (3 pages including the Registered Representative Information page) Doc type for this will be NBFORM
Conditional Receipt (NBFORM)
Check (CWA) – if received (See Cash with App Processing below)
PAC/Voided Check (if applicable)
Illustration

Each document type needs to be separated and indexed according to the NAILBA Suggested Image Document Types. **Do not** combine or group documents as this will result in errors within the CR NB Workflow process and delay the processing of the application

Joint Applications are processed as one application, as only one policy number is issued on a joint application – not as two – so do not image once for the insured and once for the joint. However, since requirements for a joint application are requested of both the insured and joint insured, these will be imaged and index as two separate document types. **Do not** combine or group requirements together for a joint application, i.e., Parameds, APS, Questionnaires, etc.

NOTE: If you have a question about a certain document, particular document type, or Business Area, please contact CR New Business Operations and/or Distribution Technology Services -CR (See Support Contacts Section) prior to indexing and releasing. This will eliminate any errors in processing.

NB Operations and/or Agency Imaging Support will notify your Agency Imaging Contact of any errors that occur in the imaging process with regard to Transamerica policies and procedures outlined in this document.

Cash with App Processing

When Cash with Application (CWA) is received an imaged copy of the check is optional. Include on the copy of the check the Policy Number(s) at the top **and** the amounts to be applied to the corresponding policies (if applicable). The check will then be prepped according to the **Document Prepping Order** above, and doc typed according to the NAILBA Suggested Document Types.

For mailing the CWA to Cedar Rapids, the check(s) must have the Policy number written on the check(s). In the case of one check covering multiple policies numbers, list all policy numbers and the appropriate premium split for each one. Bundle checks, a check log is optional, but preferred send **Personal/Confidential** to:

Transamerica Life Insurance Company
Attn: New Business
4333 Edgewood Road NE
Cedar Rapids, IA 52499

New Business Delivery Requirements

Delivery Requirements for New Business Applications:

- All documents must be indexed with the correct NBU business area in order to be routed to the correct department for processing.
- All Delivery Requirements must be indexed with the correct Policy Number, Insured First Name, Insured Last Name, Insured SS#, Insured DOB.
    - **NEW** Business – Delivery Requirements for a policy that **IS NOT** yet inforce must be indexed to the **NBU business area in order to be routed to the New Business area for processing**
- Agency shall scan and doctype the Delivery Requirements and all associated documents/requirements per the NAILBA Doc Types.
- Each Delivery Requirement Document Type must be separated and doc typed accordingly. Do not group multiples of one documents type together under one NAILBA Doc Type.
- **ALL** monies collected with Delivery Requirements must be overnighted and received in Cedar Rapids the **same** business day as images are transmitted in order to be credited – documents are to be scanned and transmitted **next business day after checks sent overnight.** Premium Checks must be copied prior to

scanning and the correct Policy Number, Insured's Name and the words **- AGENCY SCANNED -** written on the copy.

- All Delivery Requirements **must** have the policy number written or stamped on the top of **each page**. If a multi-page document or requirement, the policy number only needs to be written or stamped on the first page of the document.

Bi-weekly Close of Business

- All processing of Delivery Requirements via Agency Imaging for Bi-weekly Close of Business will adhere to the following processes:

    - **Delivery Requirements with Premium Checks**
        - All documents must be indexed with the correct business Area in order to be routed to the correct department for processing.
        - All monies collected with Delivery Requirements must be overnighted to Cedar Rapids and received **the day prior to bi-weekly close of business.** Follow the procedures above for prep and processing.
        - All Delivery Requirements must be transmitted to PaperClip no later than 12:00 pm CST on **the day prior to the close of** business in order to be matched to the overnighted checks and credited for that commission period. Any Delivery Requirements transmitted after 12:00 pm CST on the day prior to commission cutoff will not be guaranteed to be credited for that period.
    - **Delivery Requirements without Premium Checks**
        - Delivery Requirements with no premium checks can be transmitted on **the day prior to the bi-weekly close of business** up to 12:00 pm CST.

Send all Premium Checks for Delivery Requirements to the following address:

Transamerica Life Insurance Company
Attn: New Business
4333 Edgewood Road NE
Cedar Rapids, IA 52499

Transmission Errors – Bi-weekly Close of Business

In the event there are transmission failures between the agencies and PaperClip **or** PaperClip and Cedar Rapids the following are the procedures for processing Delivery Requirements on Bi-weekly Close of Business:

- **Transmission between Agencies and PaperClip**
    - Agencies will be notified by PaperClip should transmission process between the agency and the Vendor's Hub is unavailable.
    - Transamerica CR will also be notified of any transmission problems between the agencies and the Vendor's Hub.
    - Agencies shall hard copy fax to Cedar Rapids adhering to the 2:00 pm CST deadline for processing Delivery Requirements. **(If hard copy faxed to CR, do not transmit these images when scanning for agency records as it will cause duplication within the systems)**

- **Transmission between PaperClip and Cedar Rapids**
  - Agencies will be notified by Agency Imaging Support should transmission process between the Vendor's Hub and CR become unavailable.
  - Agencies will be notified of the time of the last successful transmission between CR and the Hub in order to determine if agency had scanned and transmitted Delivery Requirements **after** the last successful process
  - Agencies shall hard copy fax Delivery Requirements that had been scanned and transmitted to Vendor's Hub after the last successful processing by CR
  - Agencies shall continue to hard copy fax Delivery Requirements to CR until notified by Agency Imaging Support adhering to the 2:00 pm CST deadline for processing Delivery Requirements. **(If hard copy faxed to CR, do not transmit these images when scanning for agency records as it will cause duplication within the systems)**

New York Fixed Life Application Processing

In order to properly process New York Fixed Life New Business Applications it is necessary that the agencies adhere to the following workflow processes:

New York Fixed Life Applications with Replacement

- Any NY Fixed Life Application that involves Replacement must be processed with Transamerica according to Regulation 60 guidelines. ***Refer to TFLIC REG 60-6/03 on Transact for TFLIC Regulation 60 guidelines.***
- **Once the agency has been notified of the acceptance of the Definition of Replacement form, Disclosure Statement and Disclosure Authorization by the Reg 60 staff, the agency will follow the NB Image Processing procedure established for transmitting NB applications to CR.**
- Each Application Document Type, **including all Regulation 60 replacement related documents**, **must** be separated and indexed accordingly. Do not group multiples of one documents type together under one NAILBA Doc Type.
- As other documentation and/or requirements are processed by the agency during the Underwriting Process of the NB Application, the same workflow as above is followed as to placement of policy number on top of documentation/requirement, proper prepping per NAILBA Document types, and proper Business Area.

VUL Guidelines for Processing Work

In order to process all VUL business through the Agency Imaging process modifications to processing with regard to time deadlines are necessary. These modifications will allow for the processing periods with PaperClip and the import of images into the CR workflow.

The guidelines for processing VUL applications through the Agency Imaging process are as follows:

- All documents received in house up to and including **12:00 PM Central Time** will be processed the same day they were received
- Replacement notifications will be mailed to the company being replaced in accordance with each individual state regulations

- All New Business applications received in house up to and including **12:00 PM Central Time** will have the first review done by the underwriter the same day they were received
- All final requirements received in house up to and including **12:00 PM Central Time** will be reviewed and a decision made by the underwriter the same day
- All cases approved up to and including **3:00 PM Central Time** will be issued the same day they were approved
- All funds and monies received up to and including **3:00 PM Central Time** will be deposited the same day they were received
- All outgoing 1035 requests will be processed in accordance with each individual state regulations
- The in house Principle will review all New Business applications received up to and including **3:00 PM Central Time** that are not in good order and will initiate contact with the broker/dealer the same day the problem is discovered
- All applications that are not in good order will be returned by the end of the 5th business day if the problem is not resolved

NOTE: Should any application or documentation requiring submitting to CR VUL New Business after the 12:00 PM Central Time Deadline to be included or processed on same business day, the agency will utilize the VUL Image Fax Line **– 877-630-6863**.

If the agency submits documents to the VUL Image Fax Line it is vital that the agency <u>not</u> transmit these documents to CR when imaging for agency record keeping as doing so will cause duplication within the Transamerica workflow process.

<u>Inforce Image Processing</u>

The following steps will be required in order to process Inforce documents through the Imaging Process with Transamerica:

- All Inforce documents must have the policy number written or stamped on the top of **each page**. If a multi-page document, the policy number only needs to be written or stamped on the first page of the document.
- Agency shall scan and index the Inforce documents according to the NAILBA Suggested Document Types for Imaging – ***Customer Service Requests** doc types.
- All documents must be indexed with the Business Area of **CS** in order to be routed to the Policy Service area for processing.
- Each Inforce Document Type must be separated and indexed accordingly. Do not group multiples of one documents type together under one NAILBA Doc Type.
- All Inforce documents must be indexed using the key index field values of First Name, Last Name, Social Security Number, Policy Number, and CS Business Area.
- When using Transamerica multi-purpose form – **MPS6 -** agency **must** include the form signature page – page 4.

***NOTE:** Complex Doc Type – in order to process the Complex Doc Type properly, the Duplicate Policy Requests, Conversions, Face Amount Changes, and Rate Reductions should be prepped in the same manner as NB Applications. If there is an Application, Authorization, Report by Agency, Illustration, Money Doc, Check etc., they should be treated as separate documents and doc typed individually. The Business Area of CS (Policy/Customer Service) must be indexed to the documents to insure proper routing within the CR workflow process.

REISSUES will not be processed via Agency Imaging. Please process these documents through the existing workflow process.

NOTE: Once documentation has been scanned, indexed and released to PaperClip for transmit to Transamerica-CR no further processing is required. **Do not Fax** documents to Cedar Rapids as it will result in duplication and errors in the Inforce system. Once original first time paperwork has been submitted any subsequent paperwork can be filed according to the **Record Retention Policy section**.

NOTE: An agency utilizing the Imaging Process will not receive a Confirmation Batch ID# for documents submitted as is the current process with the Inforce Fax Server line. Unless the agency receives specific instructions from CR Operations, do not resubmit or retransmit any Image files, as it will result in duplication, possible errors, and delays in processing. It is the responsibility of the agency to perform daily audits of their transmission reports/logs for their respective system. If you have a question about a certain document, particular document type, or Business area, please contact CR Inforce Operations and/or Distribution Technology Services-CR (See Contacts for Imaging section) prior to indexing and releasing. This will eliminate any errors in processing.

Policy Change Delivery Requirements

- **POLICY CHANGE** Business – Additional Premium Requirements for a policy that **IS** inforce must be indexed to the business area **CS in order to be routed to the Customer Service area for processing. (NAILBA doctype: MONEYDOC for policy change ONLY)**

Transamerica Life Insurance Company
Attn: Customer Service
4333 Edgewood Road NE
Cedar Rapids, IA 52499

Support Contacts

PaperClip Software

For Support issues regarding Scanning Hardware or Software the agency must contact PaperClip Software and/or the agencies Third Party Reseller:

PaperClip Software Support # **201-329-6300 x131** or **800-929-3503 x131**

Transamerica Imaging Contact List

For Support Issues regarding Image files that have been successfully transmitted to Transamerica by ExamOne Imaging Solutions

Call **NB Operations – CR** at:

800-295-3900

Or contact our **Agency Imaging Support** at:

800-742-7005

Or by email at:
agencyimagingsupport@transamerica.com

NAILBA Doc Types for Imaging – July 2004

TYPE OF DOCUMENT	EXAMPLES OF INFORMATION INCLUDED	PROPOSED IMAGE DOCUMENT NAME
Application Submission = NBU		
Life Application Part 1 and related documents	Includes Application Part 1, Work Sheet, Conditional Receipt, Temporary Insurance Agreement (TIA), Limited Insurance Agreement (LIA), Agent's Report	**APPI**
Life Medical Part II and related documents	Includes Application Part II, Non-Medical, Paramed, Non-Medical Declaration, Unsigned Telemed, Signed Telemed, other company exam forms	**APPII**
Illustrations and related documents	Includes Illustration, Non-illustration forms	**ILLUS**
New Business Administrative Forms and related documents	Includes HIV Authorization, Replacement Forms, Interim Conditional Receipt, Conditional Receipt, Authorization Forms, Disclosure Statements	**NBFORM**
Correspondence and related documents	Includes Initial Cover letter / transmittal, Correspondence from GA/Agent, Correspondence from Provider, Correspondence from Proposed Insured - including requests for release of medical information, Resident Alien Card, any attached notes	**CORRESP**
Inspection Reports and related documents	Includes Personal Inspection Reports, Business / Beneficiary Inspection Reports, Credit Reports	**INSP**
Mail / Delivery Requirements and related documents	Correspondence and documents for delivery of policy, including Delivery Requirement Cover Letter, Policy Delivery Acknowledgement (PDA) / Receipt, Backdate Notice, Returned Original Policy, Good Health Statement, Amendment to Application	**DELIVREQ**
Questionnaires and related documents	Includes Coronary Artery Disease, Applicant Chest Pain, Seizure Disorder, Applicant Diabetic, Alcohol Abuse, Aviation, Tobacco Use Statement, Underwater / Sky Sports, Racing, Business Insurance, Foreign Resident / Travel, Mountain / Rock / Ice Climbing, Resident Alien, Drug Use, Life Style	**QUEST**
Supplemental Applications and related documents	Supplemental coverage attached to base policy (if a separate form is used) including Child Rider, Spousal Rider	**SUPPAPP**

1035 Information and related documents	Correspondence related to a 1035 exchange transaction to transfer cash value from one carrier to another, including Other Carrier's Check, 1035 exchange memorandum, 1035 exchange paperwork, Cost Basis Information, Minimum Deposit ResQ Worksheet, Memorandums, Loan Transfer, Letters, check stubs from Surrender Company, Statement regarding Tax Advantage Policies	**1035**
Tax Forms and related documents	Any tax forms including 1099R, 5498, W9, etc.	**TAX**
Attending Physicians Statement and related documents	Doctor notes related to history of medical condition and care (can include Lab and EKG if came as part of the APS) including Attending Physicians Statement, Reports, Office and Hospital Records, Pulmonary Function Tests, Blood Presure Recheck, Agent reimbursement for APS	**APS**
EKG / Cardio Reports and related documents	Includes Tracings, Interpretations, X-ray Copies, X-ray Reports / Interpretations, Holter Monitor, Echo Results,	**EKG**
Motor Vehicle Reports and related documents	Includes Driving Reports, MVR Reports	**MVR**
Financial Reports and Statements and related documents	Includes Trust Agreements, Financial Questionnaires, Income Statements, Financial Reports - Personal and Business	**FINAN**
Checks / Money Sheets and related documents	Any money documents, checks, authorizations for check withdrawal, and correspondence related to premium payment or other financial transaction, including Cash With App, Cash On Delivery checks, Voided Check Copy, Bank Correspondence, Premium Checks, EFT Forms, Remittance Sheet, Interim Money Sheet, COD Money Sheet, Returned Checks, Govt Allotment Forms, PAW Card / Voided Check Copy, PAW Correspondence	**MONEYDOC**
HOS / SMAC Results and related documents	Electronic Receipt of Urine Blood Test	**HOSMAC**
HOS Results and related documents HOS	Paper Urine Test Results	**HOS**
SMAC Results and related document	Paper Blood Test Results	**SMAC**
Lab Ticket and related documents	Lab Receipts / Urine / Blood Test documents or forms used during collection	**LABTICK**
Senior Supplement		**SENIORSUP**

Licensing = C & L		
Agent License Information and related documents	Copies of licenses required for appointment with state, and to satisfy carrier compliance guidelines, including License copy	**LIC**
Agent Appointment Information and related documents	Includes Brokerage Authorization, Authorization to Disclose, Producer Information Form, General Correspondence, Appointment documents for pre-appointment states required by carrier, Agent Address Change	**APPT**
Contract / Commission Information and related documents	All information related to contracts and commissions, including Brokerage Authorization, Authorization to Disclose, Producer Information Form, General Correspondence, Contract documents, Commission Splits, Commission Agreements, Commission Schedules, Commission Statements, Single Case Agreement	**CONTRACT**
Commission Assignments and related documents ASSIGN	All information related to Commission Assignments, including Assignment of Commissions, Release of Assignment of Commissions	**ASSIGN**
E & O	E & O	**E&O**
Policy Service Requests = CS		
Policy Owner Service Requests and related documents	Includes Non-financial transactions, Policyholder requests for non-financial changes to or information on an inforce policy, Servicing Agent Change, Ownership changes, Beneficiary changes, Name changes, General correspondence, Modal premium changes, Policy audit requests, Policyholder requests for complex policy transaction on an existing policy, Duplicate policy requests, Reissues, Conversions, Face amount changes, Amendments, Rate reductions, Rider Changes (To include Child), Address Changes, Collateral Assignments (Policy Value), Absolute Assignments (Policy Value), Release of Assignments (Policy Value), Reinstatement Requests	**POS**
Policy Owner Financial Transactions and related documents	Policyholder requests for a monetary transaction on policy including Surrender (Full and Partial), Withdrawals (Full and Partial), Disbursement Forms (loans, etc.), Dividend Form, PUA Surrender, Loans (Full and	**POSDISB**

	Partial), Death Claims	
Checks/Money Sheets	Remittance sheet Interim Money Sheet COD Money Sheet Returned Checks PAW Card/Voided Check Copy PAW Correspondence Premium Checks EFT Forms Government Allotment Forms	**MONEYDOC**
Correspondence and related documents	Correspondence from GA/Agent, Correspondence from Provider, Correspondence from Insured related to policyholder requests.	**CORRESP**
Mail / Delivery Requirements and related documents	Correspondence and documents for delivery of policy, including Delivery Requirement Cover Letter, Policy Delivery Acknowledgement (PDA) / Receipt, Backdate Notice, Returned Original Policy, Good Health Statement, Amendment to Application	**DELIVREQ**

Record Retention Policy

No. 3783
August 20, 2008
To General Agents

Updated Records Retention Policy

The purpose of this Agency Managers' Bulletin is to inform you of the Company's updated records retention policy. Please be advised that this Bulletin supersedes AMB Nos. 3721, dated February 5, 2007.

The Company has implemented an Electronic Records Retention Policy. This policy enables general agents to submit original copies of documents electronically, eliminating the need to send original documents to the Iron Mountain storage facility in Kansas City. This new process will also allow you to purge hard copies of these company records after 90 days, instead of retaining them indefinitely.

REQUIREMENTS

Electronic Records Transmissions

Electronic transmissions should still be transferred in accordance with Company procedures. All documents transmitted electronically should be clear, complete and transferred through an approved secure medium and/or an approved vendor. If successfully transferred electronically, documents will not need to be sent to the Company via hard copy (see exclusions). Please note, however, the Company reserves the right to request any original document at any time during its designated retention period prior to destruction, and to extend or shorten the retention period of documents prior to their designated destruction date.

Storage, Retention and Destruction

Documents should be stored in a secure location where access is limited to authorized personnel only**.** All documents should be kept for a minimum of 90 days from the date of complete transmission to the Company. After 90 days, all documents that have been successfully transmitted to the Company, with the exception of those documents that are subject to a Legal Hold, may be destroyed.

Note that at this time, no documents subject to an ongoing Legal Hold may be destroyed.

Records that contain personal, private and confidential information must be destroyed in a manner in which the information can't be read or reconstructed. The acceptable methods for destruction are incineration and cross-cut shredding.

The Company can recommend vendors to help you determine an appropriate destruction solution. For assistance, please email the following information to Steve Kettle at
skettle@aegonusa.com.

• Your name
• Telephone number
• Location
• Estimate of sheets per month to be destroyed

Also, please indicate if other parties at your location would be interested in sharing a container for purposes of destroying records.
Please be aware that the cost of record destruction is your responsibility, not Transamerica's.

Exclusions

The following original documents may be requested to be sent to the Company.

- Documents containing a raised seal or impression, such as death certificates, agent state licenses, etc.

- 1035 Forms

The Company retains the right to inspect records for compliance with this policy. For questions or more information, please contact Record Manager Danica Goodell at 319-355-2654 or dgoodell@aegonusa.com.

Please Note: This policy does not apply to the retention of documents and records that pertain to securities products, including variable insurance products, which are subject to the record retention requirements of the SEC’s books and records rules. If you are a registered representative of a broker-dealer and have any questions, please contact your broker-dealer’s compliance department