

AI record-classification branch map

Broker-dealer records officers, compliance teams and security architects

[Read the complete guide on aona.ai](#)

Do not classify an AI conversation solely by the tool that created it. Determine whether its content or use makes it a record required under applicable FINRA or Exchange Act rules. Rule 4511's six-year fallback applies to required FINRA records with no other specified period, not automatically to every prompt.

Use explicit yes, no and unknown outcomes to reach the retention and archive decision. Separate fictional business cases are included in the download.

General decision logic plus synthetic business examples. No actual record determination, archive validation or litigation hold is represented.

Your review

Reviewer: _____ Date: _____

Organisation or team: _____

☐ **Identify the actual record rule**

Tie classification to business content and use, not only the app, file type or draft label.

☐ **Document the period and basis**

Distinguish a specified period from the Rule 4511 fallback and any separate preservation obligation.

☐ **Verify the archive handoff**

Map required context, identity, retrieval, format and media with the responsible records team.

Checked items record your review, not a compliance approval or an installed-product test result.

Notes and next actions

Decision and scope: _____

Evidence to collect: _____

Owner and next review date: _____

Review matrix

Question	Finding	Next outcome
Does a FINRA or applicable Exchange Act record requirement apply?	Yes	Identify the exact required record and governing rule.
Does a record requirement apply?	No under the assessed rule	Check other applicable retention or preservation duties; do not infer all deletion is permitted.

Question	Finding	Next outcome
Does a record requirement apply?	Unknown	Escalate classification before deleting potentially relevant material.
Is a retention period specified by the applicable rules?	Yes	Use that specified period for the identified record.
Is it a required FINRA record with no specified period?	Yes	Apply Rule 4511(b)'s at-least-six-year fallback.
Are format, media and archive requirements established?	No or unknown	Resolve the Rule 17a-4 handoff with the records team; a chat export is not enough.
Is a separate preservation obligation relevant?	Yes or unknown	Resolve that obligation before routine disposal.
Are classification, period and archive handoff established?	Yes	Preserve and retrieve the required evidence under the documented process.

An unknown answer needs an owner

- **Record required?:** Yes: identify the rule. No: check other duties. Unknown: escalate.
- **Period specified?:** Use it; apply the six-year fallback only where its conditions hold.
- **Archive ready?:** Resolve format, media and required context.
- **Preservation issue?:** Resolve before routine disposal.

Separate fictional classification cases

Situation	Classification question	Next outcome
Generic question about a public definition	Was it merely reference material, or used as evidence of a regulated business activity?	Records owner determines whether any record requirement applies; do not classify by tool alone.
AI draft later sent to a customer	What communication record and material review evidence are required?	Preserve the applicable final communication and supporting record under the relevant rule.
AI summary used in supervisory review	Which review decision, source material and findings must be evidenced?	Link required supervisory evidence to the appropriate records process.
Unsent draft contains material decision context	Does the actual rule or preservation duty require this context?	Resolve before deletion; "draft" alone is not a decision.
Required FINRA record with a specified period	Which FINRA or Exchange Act period applies?	Use the applicable specified period.
Required FINRA record with no specified period	Does Rule 4511(b)'s fallback apply?	Apply at least six years where the fallback conditions are met.

Situation	Classification question	Next outcome
Format, media or preservation uncertain	Are archive requirements or a specific preservation obligation unresolved?	Escalate to the records/legal owner; do not claim a normal chat export resolves them.

Synthetic handoff record

Reference: TEST-RECORD-01

Activity: fictional customer communication

Draft: TEST-DRAFT-01

Final communication: TEST-FINAL-01, not sent

Review: fictional role and check, no actual approval

Archive validation: not run

Apply the actual record rule before assigning retention. No real archive or preservation order is represented.

Sources and scope

Sources checked 2026-09-21. Review the current requirements and your actual agreement before using this workbook for a real decision. General information, not professional approval or a completed control test. It is not represented as a Rule 17a-4 books-and-records archive and does not classify every conversation's legal status.

[FINRA Rule 4511: General requirements](#). Required books and records, the six-year fallback only when no other period is specified, and Rule 17a-4 format/media requirements.

[FINRA Regulatory Notice 24-09](#). Technology-neutral duties, pre-deployment evaluation, supervision and communications standards for generative AI use.