

TeleSeal Electronic Journal & Audio/Video Handling SOP

Version: 1.0

Effective Date: 2025-07-27

Review Cycle: Annual

Owner: Head of Operations

1. Purpose

Define the procedures for creating, storing, securing, and retrieving the electronic journal and audio/video (A/V) recordings of Remote Online Notarization (RON) sessions, in compliance with Arizona RON rules (A.R.S. §2-12-1308, §2-12-1309) and TeleSeal policies.

2. Scope

Covers all RON sessions conducted via TeleSeal, including:

- Electronic journal entries
- Synchronous A/V recordings
- Secure storage, retention, and disposal

Applies to Notaries, Compliance Team, IT/DevOps, and any staff interacting with journal or A/V data.

3. Roles & Responsibilities

Role	Responsibility
Notary	Create accurate journal entries; start/stop recording per SOP
Session Host	Verify recording status; ensure journal fields are completed
Compliance Team	Audit journal & A/V integrity; review tamper-evidence controls
IT/DevOps	Configure recording pipelines; enforce encryption & retention policies
CISO	Maintain policies; review audit logs; oversee integrity controls

4. Journal Entry Procedure

1. Session Initialization

- Upon client & Notary joining, system auto-generates a **Session ID**.

- Journal record created with Session ID, Notary ID, timestamp.

2. Logging Events

For each key action, automatically record:

- **Identity Proofing:** method (Authenticate.com credential, KBA, witness), result, timestamp
- **Document Load:** document name/ID, pages count, timestamp
- **Signature Event:** actor (Notary or Signer), page/field, click coordinates, timestamp
- **Seal Application:** Notary ID, certificate serial, timestamp
- **Session End:** timestamp, duration

3. Tamper-Evidence

- Each entry chained via cryptographic hash; alterations break the chain.

4. Access Controls

- Read/write limited to service account and Compliance Team via RBAC & MFA.
 - Audit trail of any journal access or export.
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5. A/V Recording Procedure

1. Recording Start

- Automatically initiate Twilio Video recording at session start.
- Record both audio and HD video streams; link to Session ID.

2. Monitoring

- Session Host verifies live recording indicator before identity proof begins.
- System alerts if recording fails or disconnects.

3. Pause/Resume

- Allow brief pause only for technical issues; record pause/resume events in the journal.

4. Recording Stop

- Automatically stop upon session end.
 - Consolidate media segments into a single encrypted container.
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6. Storage & Retention

Asset Type	Storage Location	Retention Period	Post-30-Day Transition
Raw A/V Files	AWS S3 (SSE-KMS)	30 days	Transition to Glacier Deep Archive (Immutable)
Archived A/V	AWS Glacier Deep Archive	7 years	Locked until retention expires

- **Immutable Lock** prevents deletion or modification until retention expiry.
 - **Backups:** Daily snapshot of RDS and S3 bucket; encrypted and stored in separate AWS region.
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7. Retrieval & Access

1. Compliance Audits

- Compliance Team requests retrieval via ticket.
- IT/DevOps grants time-limited, read-only access via secure link.

2. User Requests

- Client downloads signed PDF via portal; A/V and journal links not exposed directly.
- For legal requests, provide exports under NDA.

3. Logging

- All retrievals (export, view, download) logged with user ID, asset ID, and timestamp.
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8. Security & Integrity

- **Encryption In Transit:** TLS 1.2+ for all S3 and database connections.
 - **Encryption At Rest:** AES-256 for S3 and RDS; AWS KMS for key management.
 - **Integrity Checks:** Scheduled Lambda verifies journal hash chain; alerts on discrepancies.
 - **Access Reviews:** Annual review of journal/A/V access logs by Security Team.
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9. Exception Handling

- If recording fails irrecoverably:
 - Notary logs the failure as a journal entry.
 - Client must reschedule or revert to in-person notarization.
 - Emergency data access (e.g., legal subpoena):
 - Obtain CISO approval; document in Incident Log; provide minimal required data.
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10. Review & Updates

- Reviewed annually or upon:
 - Changes to Arizona RON regulations
 - New AWS/Twilio feature releases impacting recording/storage
 - Audit findings or security incidents
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End of TeleSeal Electronic Journal & Audio/Video Handling SOP