

COMPLIANCE CAPABILITY REPORT

Nucleus One and FINRA: Recordkeeping Capability Report



BUILT ON GOOGLE CLOUD

Independent certifications of the Google Cloud infrastructure Nucleus One runs on. Reports available through Google Cloud's Compliance Reports Manager; the public SOC 3 summary and the ISO 27001 certificate require no account.

How Nucleus One supports FINRA Rule 4511 books-and-records and Rule 3110 supervision obligations.

Issued September 2026 · Prepared by Ademero, Inc. for customer compliance and IT review

Executive summary

FINRA Rule 4511 requires firms to make and preserve records of their business, Rule 3110 requires documented supervision, and SEC Rule 17a-4 sets electronic-storage requirements assessed against a firm's storage systems and procedures together. These obligations attach to the firm — software is an enabler. Nucleus One provides the recordkeeping and supervision capabilities mapped below, on Google Cloud infrastructure independently attested to SOC 2 Type II and SOC 1 Type II and certified to ISO 27001. The table maps each rule element to the capability that serves it and the evidence it produces.

Capability mapping

FINRA RULE ELEMENT	NUCLEUS ONE CAPABILITY	EVIDENCE PRODUCED
Rule 4511 — record of business activity	Document events: twelve event types with actor, timestamp, and change detail; project-wide, filterable Events feed spanning documents, tasks, and assets	A reviewable, sortable activity record per document and per project
Rule 4511 — preservation of originals in normal use	Full revision history retained with author and timestamp; restoring an earlier revision creates a new revision rather than rewriting history	Complete version lineage with visual comparison
Rule 3110 — documented supervisory review	Approval Processes with multi-party group approvals (any / all / majority), required-fields gates before sign-off, and recorded outcomes	Every supervisory decision logged with process, step, participants, and timestamp
Safeguarding — access limited to authorized persons	Organization and project roles; per-area access levels; folder sharing with inheritance; project groups; organization-enforced MFA (TOTP)	Access configuration reviewable per project; MFA enforcement visible in Security Settings

The certification layer: infrastructure attestations and application controls

Nucleus One runs entirely on Google Cloud (App Engine, Cloud Firestore, Cloud Storage). Every layer beneath the application — data centers, physical security, network, storage durability, encryption at rest and in transit, and operational controls — is covered by Google Cloud's independent SOC 2 Type II and SOC 1 Type II attestations and ISO 27001 certification. These reports are available directly through Google Cloud's Compliance Reports Manager (cloud.google.com/security/compliance/compliance-reports-manager); the public SOC 3 summary and the ISO 27001 certificate are available there without a Google account. This shared-responsibility structure — infrastructure attestations from the cloud provider, application controls from the software vendor — is the same model AWS- and Azure-hosted software uses. At the application layer, Nucleus One adds organization-enforced multi-factor authentication (TOTP), role-

and area-scoped access control, enforced multi-party approvals, complete document event history, and revision integrity, all served exclusively over HTTPS with strict transport security.

Scope of this report — This report describes product capabilities and the attestations of the underlying infrastructure. It is not a certification of regulatory compliance, which attaches to your organization's processes and controls; no software product can be certified as FINRA-compliant. Statements reflect the product as of the issue date above. This document is not legal or audit advice.