

By ANDY ZAVOINA, CRCM

Metadata, Mega-Problem

IF YOU USE MICROSOFT WORD, EXCEL, OR POWERPOINT, you are following the industry standard. There is nothing wrong with these programs, but just as you manage risks in your bank, so must you manage risks in your electronic documents—even when those risks are invisible. There are bits and bytes of information called “metadata” contained in all of these documents that you need to know about to mitigate the risks. Those risks are exemplified in these three true examples:

In February 2003, the British government posted a Microsoft Word document on one of its Web sites. It addressed Iraq’s security and intelligence organizations. It was later discovered that much of the report’s content was actually plagiarized from a U.S. researcher. In addition, the Word document contained metadata that allowed a savvy reader to see information on the 10 sets of revisions made to the document, allowing that reader

and code it shares with the Linux operating system. SCO’s highly publicized cases have created a lot of controversy, as the company sent letters to the world’s 1,500 largest companies advising them of SCO’s ownership of the system and the need for proper licensing. In February 2004, SCO filed suit against DaimlerChrysler. Metadata in the Word document revealed that there were edits to the document. Instead of DaimlerChrysler, it initially named Bank of America as the defendant; the document log shows the file was edited at 11:18 a.m. on February 18, 2004, to make the change. On February 27, the filing location for the suit was switched from California to Michigan, DaimlerChrysler’s home state. The bank’s name could have been a temporary placeholder, but the thrust here is that these documents, even when edited, can tell stories that may be fact or fiction.

Earlier this year, California Attorney General Bill Lockyer sent a letter to software developers who work on peer-to-peer sharing programs, echoing recording-industry concerns over copyright issues and the need for software developers to be responsible corporate citizens. Metadata contained in the document revealed the letter was originally created by Vans Stevenson, the principal state affairs lobbyist for the Motion Picture Association of America.

Let’s review a banking example: James, a new commercial lender, is

unfamiliar with the bank’s approval procedures and is still working with a mentor. James receives a request late in the day and is told the customer is the bank president’s neighbor. The request has to be processed immediately, and it doesn’t matter that this is James’ wedding anniversary. Frustrated, James loads Word on his computer and in the first line types, “This is bull.” Having gotten a bit of aggravation out of his system, he completes the request and when he saves it, he is careful to delete the text he put at the top and to appropriately name the document. James sends his mentor a loan memorandum outlining the details of the loan he wants to recommend for approval in the form of a Word document, asking that it be “redlined” for any corrections. Here is part of the memo:

James’s mentor is also working a late night. He turns on “Track Changes” in the Tools menu, adds some notes to the file, and returns it so that the terms can be presented to the borrower. There is no discussion with James, just some document edits and comments inserted so he can learn how business is done at the bank. James reviews the changes and in his copy of Word 2002 uses the pull-down menu to review the document in final form. (Pull-down menu depicting the viewing options.)

James is working an even later night than his mentor. Because the terms are already well defined and formatted, he selects “Save As” and renames the document. He edits the content into letter format and attaches it to an e-mail message so he can respond quickly to the borrower. He sends the message knowing the borrower will be pleased that he stayed so late to get this done on time.

John Doe, the borrower, is not pleased with the terms he has been

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to learn who edited it and when. That included the fact that in revisions four and five a copy was put onto a floppy disk, which was later reportedly given to Secretary of State Colin Powell and its information was cited in his speech to the United Nations.

SCO is a software company involved in litigation and ownership claims over the Unix operating system

offered. As he stews over the terms, he points his mouse to the File menu and looks at the Properties entry. The title of the document is “This is bull.” When James originally went to save this document, that was the first line and it is automatically embedded as the properties title even though the document was properly named from the first time it was saved.

Not happy, John selects the viewing options box where James selected “Final,” and selects “Original Showing Markup” instead. What he sees is both enlightening and disheartening.

John sees the edits that changed the requested amount of \$150,000 to \$50,000, shortened 60 months to 12 with a note that if he can’t pay in six months his account isn’t wanted, and added 3 percent in fees to the cost of the loan, with the annotation, “Let’s hit him with some fees. We don’t really want any loans over there so if we have to make one for CRA, let’s make it worth it.” The annotation goes on to read “Remember to delete my comments before you send the offer.” They were deleted, but they were not erased.

Metadata is data about data. It can be useful when you are sending a document from person to person and you want to track the changes that are made. They help facilitate collaboration and provide a copy of the trail the document took. But metadata can also, as the example demonstrates, represent a serious reputation or customer-relations risk for your bank.

There are many types of metadata in the documents we use every day:

- track changes
(shows inserted or deleted text)
- comments
- your name
- your initials
- your e-mail address
- your company or organization’s name
- the name of your computer
- the name of the network server or hard disk on which you saved the document
- other file properties and summary information

- the names of previous document authors
- document revisions
- document versions
- template information
- hidden text
- macros
- hyperlinks
- routing information
- nonvisible portions of embedded object linking and embedding (OLE)

Some of these fields are harmless, but you still need to ask whether there is any reason to provide the information in the first place.

If you do not want this metadata disclosed, what can you do and still function in a collaborative way? There are programs available—some free—that remove this data. With software evolving as quickly as it does, however, I am hesitant to recommend anything in particular. A Web search and due diligence on the part of your institution’s IT group should yield acceptable results. Microsoft also has a tool available for newer versions of its software and tips for removing it from older versions in various Knowledgebase articles on its Web site. There are also steps you can take as an organization:

- 1. Create new documents.** A study completed by Vanson Bourne, a research company, determined that 90 percent of documents started as different documents. The “Save As” option is very popular, and this metadata follows the original.
- 2. Avoid “Track Changes,” “Versions,” and “Fast Saves.”** Turning off the options that track the document versions and edits can be helpful. Sometimes this is not practical, but if you turn off these options, the text you do not want won’t be archived for viewing later.
- 3. Remove hidden text and comments.** These can be viewed in the editing process but should be cleanly removed if intended for the “work in progress” and not the end user. Hidden text, designated as such in the font attributes selection box, may be viewed on your screen by turning on the “¶” indicator.
- 4. Establish a policy and procedures** that metadata be deleted using an approved program prior to distribution in both internal and external documents, as it takes little

imagination to see other risks in HR or security documents, as examples; and that Word, PowerPoint, and Excel documents not be posted on your Web site for download, and be posted to an intranet only when the content is known to be “clean.” Such documents may be best converted to PDF.

The moral of the story is that written comments may not be “just between us” or “off the record.” While I focused on the Office Suite many of us use, Adobe Acrobat and Corel WordPerfect also have metadata fields. Be cautious and professional in the way you handle all your documents, or you may find yourself defending them to the *60 Minutes* crew knocking on your car window or a jury of your customer’s peers. Learn the risks associated with the programs and processes you use now, and mitigate them. **BC**

ABOUT THE AUTHOR

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