

SERFF Tracking Number: JACK-127619231 State: Arkansas  
Filing Company: Jackson National Life Insurance Company State Tracking Number: 49788  
Company Tracking Number: ELECTRONIC SIGNATURE PROCESS  
TOI: L08 Life - Other Sub-TOI: L08.000 Life - Other  
Product Name: Electronic Signature Process  
Project Name/Number: Electronic Signature Process/Electronic Signature Process

## Filing at a Glance

Company: Jackson National Life Insurance Company

Product Name: Electronic Signature Process SERFF Tr Num: JACK-127619231 State: Arkansas  
TOI: L08 Life - Other SERFF Status: Closed-Accepted State Tr Num: 49788

For Informational Purposes  
Sub-TOI: L08.000 Life - Other Co Tr Num: ELECTRONIC State Status: Filed-Closed  
SIGNATURE PROCESS

Filing Type: Form Reviewer(s): Linda Bird  
Authors: Julia Braem, Julie Hughes, Disposition Date: 09/16/2011  
Lynne Gerding  
Date Submitted: 09/14/2011 Disposition Status: Accepted For  
Informational Purposes  
Implementation Date: 10/31/2011  
Implementation Date:

Implementation Date Requested: 10/31/2011  
State Filing Description:

## General Information

Project Name: Electronic Signature Process Status of Filing in Domicile: Pending  
Project Number: Electronic Signature Process Date Approved in Domicile:  
Requested Filing Mode: Informational Domicile Status Comments:  
Explanation for Combination/Other: Market Type: Individual  
Submission Type: New Submission Individual Market Type:  
Overall Rate Impact: Filing Status Changed: 09/16/2011  
State Status Changed: 09/16/2011  
Deemer Date: Created By: Lynne Gerding  
Submitted By: Julia Braem Corresponding Filing Tracking Number:  
Electronic Signature Process

Filing Description:

Submitted for your informational review is the electronic signature process outlined below.

Jackson National Life Insurance Company (Jackson) intends to accept electronic signatures on previously approved application forms. Jackson will adopt measures to secure both the integrity of applications signed by electronic signature, and the confidentiality of any information transmitted. Information contained in the application will be transmitted to Company's administrative office electronically as well as the electronic signature of the Owner/Applicant and the insurance producer. Current technology will be used to ensure that the confidential information is not

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compromised. All processes used will comply with the Uniform Electronic Transactions Act, and to the extent applicable, the Federal ESIGN Act.

Company hereby certifies that any electronic signature it obtains will be linked to the data on the application in such a manner that the electronic signature is invalidated if any of the data on the application is changed. Company also certifies that such electronic signature intended for use with these applications will not be affixed to or duplicated on any other document. A copy of the application, identical to the filed form, will be printed and made part of any policy issued. Included with this filing is a summary of the electronic signature process that will be utilized.

This process may be utilized with any previously approved annuity application, life insurance application or supplemental application required for the issuance of an annuity contract and/or life insurance policy and any application or supplemental application that Jackson National Life Insurance Company may develop and file with your Department for approval in the future.

We look forward to your favorable review. If I can be of any assistance to you, or if additional information is required, please contact me by telephone at 800/317-7989, by facsimile at 517/706-5522, or by email at pd&sf@jackson.com.

## Company and Contact

### Filing Contact Information

Julia Braem, Filing Manager pd&sf@jackson.com  
 1 CORPORATE WAY 800-317-7989 [Phone]  
 LANSING, MI 48951 517-706-5522 [FAX]

### Filing Company Information

Jackson National Life Insurance Company	CoCode: 65056	State of Domicile: Michigan
1 Corporate Way	Group Code: 918	Company Type:
Lansing, MI 48915	Group Name:	State ID Number:
(800) 317-7989 ext. [Phone]	FEIN Number: 38-1659835	

## Filing Fees

Fee Required?	Yes
Fee Amount:	\$50.00
Retaliatory?	No
Fee Explanation:	\$50.00 per form - 1 form
Per Company:	No

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COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Jackson National Life Insurance Company	\$50.00	09/14/2011	51587739

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## Correspondence Summary

### Dispositions

Status	Created By	Created On	Date Submitted
Accepted For Linda Bird Informational Purposes		09/16/2011	09/16/2011

*SERFF Tracking Number:* JACK-127619231      *State:* Arkansas  
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## **Disposition**

Disposition Date: 09/16/2011

Implementation Date:

Status: Accepted For Informational Purposes

Comment:

Rate data does NOT apply to filing.

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Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		No
Supporting Document	Application		No
Supporting Document	Electronic Signature Process Document		Yes

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## Supporting Document Schedules

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Bypassed - Item:</b> Flesch Certification		
<b>Bypass Reason:</b> Not applicable		
<b>Comments:</b>		

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Bypassed - Item:</b> Application		
<b>Bypass Reason:</b> Not applicable		
<b>Comments:</b>		

	<b>Item Status:</b>	<b>Status Date:</b>
<b>Satisfied - Item:</b> Electronic Signature Process Document		
<b>Comments:</b>		
<b>Attachment:</b> Electronic Signature Process Document.pdf		

## **1. SYSTEM DESCRIPTION**

The following information outlines the procedures to be undertaken by Jackson in connection with the processing of business electronically that:

- Are used to obtain an applicant's consent to (a) engage in business electronically, and (b) receive certain legally required eDocs;
- Signers employ to execute eDocs with eSignatures (the "eSigning Process");
- Incorporate controls with regard to the integrity, privacy and safeguarding of the eDocs associated with an annuity application and any subsequent eAnnuity; and
- Are used to store eDocs associated with each eAnnuity such that information stored in the eDocs are accurately retained.

### **(a) System Modules & Components**

Jackson will engage in business electronically through an electronic order entry platform comprised of three modules: (i) an Annuity Sales and Service Center ("Annuity Center") which enables Financial Advisors ("FA") to create, submit, print, review, delete or otherwise manage an electronically applied for annuity ("eAnnuity"), (ii) web services and servers to support the exchange of data and electronically transmitted documents ("eDocs") between Jackson and its distribution partner ("Secure Portal"); and (iii) an electronic signing ("eSigning") platform ("eSignature Platform").

### **(b) Access to the System**

There are two ways an FA may access the Jackson electronic order entry platform system (the "System"): via a URL<sup>1</sup> across the World Wide Web from any location, or by using a credentialed workstation within Jackson's secured network. In the first scenario, the FA would enter a username and password issued by Jackson. All URL access to the System uses a secure hypertext transfer protocol or "HTTPS," the combination protocol of HTTP over an encrypted Secure Sockets Layer or "SSL." HTTPS uses 128 bit encryption to secure data transferred to and from the System. After successfully logging into the System, the FA can access the Annuity Center. Once an FA has ended his or her session in the Annuity Center, s/he must present login credentials upon each subsequent attempt to enter the Annuity Center.

### **(c) Creation of the eAnnuity Order**

The FA creates a new annuity application order ("Order") in the Annuity Center. Annuity information such as the type of product and plan, an account designation, the carrier and state is entered into the Annuity Center by the FA. If the annuity will be signed electronically, the FA will designate the Order as an electronic Order by selecting an affirmative response, such as a "Yes" radio button for a general question such as "Is this an electronic order?" Each Applicant'

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<sup>1</sup> A URL is a Uniform Resource Locator, an identifier that specifies where a resource is available and the mechanism for retrieving the resource.

email address is obtained and associated with the Order. Applicants must have an email address in order to be eligible to eSign the eDocs.

Once the FA has entered the information for the Order and checked for any errors, the FA submits the Order. The Annuity Center prepares the eDocs in the ISO-standard Adobe Portable Document Format ("PDF")<sup>2</sup> and the eDocs are uploaded to the Secure Portal.<sup>3</sup> The eSignature Platform is notified by a SOAP message<sup>4</sup> that the eDocs are available on the Secure Portal and ready for eSigning. The SOAP message contains the list of eDocs for the eAnnuity transaction, the X and Y coordinates for locations in each eDoc where eSignatures are to be placed, and information specific to the eAnnuity transaction. The eSignature Platform downloads the eDocs from the Secure Portal, responds to the Annuity Center with an acknowledgement of the download, and generates an email message for the FA indicating the eDocs are ready for eSigning. The eSignature status is set to "Awaiting Signature" or other similar statement and the FA receives a confirmation number for the Order.<sup>5</sup>

#### **(d) Preparing the eAnnuity Order for eSignature**

After the FA receives an email from the Annuity Center indicating that the eDocs are available for eSigning, the FA initiates the eSigning Process. The FA is redirected from the email link to the Annuity Center and is presented with a list of previous Orders and activities for each Order. The following information will generally be associated with each Order:

- Actions (print, delete, email, etc.)
- Advisor Name
- Owner Name
- Account Number
- Premium Amount
- Date
- Product Type
- Status
- Confirmation Number
- Reviewer

Once in the Annuity Center, the eDocs associated with each eAnnuity Order are presented in a list. Each eDoc on the list reflects the (i) title of the eDoc, (i) names of the designated Signers,

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<sup>2</sup> PDF is an open standard published by the International Organization for Standardization as ISO/IEC 32000-1:2008.

<sup>3</sup> The Secure portal will employ FTPS, the File Transfer Protocol that contains support for Transport Layer Security (TLS) and the Secure Sockets Layer (SSL) cryptographic protocol.

<sup>4</sup> Originally defined as Simple Object Access Protocol, SOAP is a protocol specification for exchanging structured information in XML (eXtensible Markup Language, *see* <http://www.w3.org/XML/>) in a web services implementation. *See also* <http://www.w3.org/TR/2007/REC-soap12-part1-20070427/>.

<sup>5</sup> Screenshot #4.

(iii) date of the eSignature (once affixed), (iv) action(s) required (read only, acknowledge or sign), and (v) status of the eDoc (in process, not started, etc.). The eDocs may be accessed for review in any order. Each eDoc must be reviewed, acknowledged and/or eSigned by the FA prior to its presentation to each Applicant for his or her review, acknowledgement, and/or electronic signature.

To eSign an eDoc, the FA clicks on an individual eDoc in the list. The eDoc is rendered on the System screen in an ISO-standard PDF format, and areas for eSigning are denoted by the text, such as “Click here to sign,” and by an image of a round green “X.” When the FA clicks the signature area, a pop-up box is displayed that contains a check box which states generally “I am or I represent [Applicant Name] and I acknowledge this is a legally binding signature.” The pop-up box also contains a “Sign” button and a “Cancel” button. The FA, as the Signer, must take two actions: (i) check the box, and (ii) click the “Sign” button. eSignatures are immediately affixed to the eDoc, and include the FA’s name, the date and time of the eSignature, a unique reference number for the eDoc, and a number that is unique to the signer. If the FA clicks a button such as the “Cancel” button or other similar button, no eSignature is affixed.

Once the FA has eSigned and/or acknowledged all of the eDocs in an eAnnuity Order list, an email is generated by the eSignature Platform to the Applicant(s) on that eAnnuity Order indicating that its associated eDocs are available via a hyperlink, and ready for eSigning.

**(e) Applicant Consent to eAnnuity Transaction, eDocs & eSignatures; Authentication**

Each Applicant clicks a hyperlink in the email to access the eDocs in the eSignature Platform. Applicants must view the Electronic Consent and Disclosure (“ECD”) and agree to its terms, such as by clicking the “Accept” radio button, in order to proceed with the transaction. If an Applicant does not agree to its terms and instead chooses a button such as a “Decline” radio button, the eSigning Process terminates. Each Applicant must enter the last four digits of his/her SSN and date of birth or other personally identifiable information into the eSignature Platform. Once an Applicant has entered the required information, he/she may proceed.

Once an applicant accepts the ECD, the applicant will be presented with a set of identity verification questions, which may come from a variety of third parties (such as RSA, Verid). If the Applicant successfully answers the questions, the button labeled “On to Style your PIN” or similar text is enabled. The Applicant clicks the button to continue, and must choose a signature style and enter a signing password (“eSigning PIN”). The eSigning PIN must be 6-20 characters long and contain one letter and one number. The System obscures the eSigning PIN by masking the plaintext input by the Applicant. The eSigning PIN is not stored by the System, and the Applicant is cautioned to choose an eSigning PIN that is known only to the Applicant and is easy to remember.

**(f) eSigning Process for Applicant(s)**

The eDocs are presented to each Applicant. To electronically sign an eDoc, an Applicant selects an eDoc and then clicks on the eDoc or clicks on a button such as “Back” or “Next” to navigate the list. The eDoc is rendered on the screen in an ISO-standard PDF format, and areas for eSignatures are denoted by text such as, “Click here to sign,” and by an image of a round green “X.” The Applicant is presented with a status list of the eDocs and with navigation of the number of pages within the eDoc. When the Applicant clicks the signature area, a pop-up box is displayed that contains, generally : (i) a textbox for entry of the eSigning PIN, (ii) a “Sign” or “Acknowledge” button, (iii) a “Cancel” button, and (iv) the text: “I am [Applicant Name] and I agree to be bound by this electronic signature.” The Applicant must take three actions: (i) enter his or her eSigning PIN created during the authentication process, (ii) check the box and (iii) click a “Sign” button.

Upon clicking a “Sign” button, an Applicant’s eSignature is immediately affixed to the eDoc. The eSignature contains the Applicant’s name, the date and time of the eSignature, a unique reference number for the eDoc and a number that is unique to the Order. All such eSigning occurs in an ordered, sequential fashion. If the eAnnuity Order contains multiple Applicants, each Applicant is sent an email after the previous Applicant has executed all eDocs, inviting the Applicant to eSign the eDocs previously so signed by his or her co-Applicant.

If an Applicant clicks a button indicating his or her desire to cancel or void the transaction, no signature is affixed. In addition, at any point in the process an Applicant may opt out of signing an eDoc electronically by navigating the web browser away from eSignature Platform. In the event a session unexpectedly terminates or times out, the Applicant must access the eDocs again from the email link, enter in the last four digits of his/her SSN and date of birth, and enter a new eSigning PIN.

**(g) Technical Details of eSigning Process**

Once eSigned by all Signers, the eDocs are uploaded to the Secure Portal, and a SOAP web service request is sent to the Annuity Center indicating that the eDocs have been executed. The Annuity Center downloads the eDocs from the Secure Portal and sends a SOAP response message to eSignature Platform indicating that this action has been completed.

eSignatures affixed to eDocs are represented in the System as PDF digital signatures, which provide document integrity to ensure that the eDoc has not changed since the eSigning Process was completed.<sup>6</sup> PDF digital signatures utilize PKCS#7<sup>7</sup> to eSign and encrypt the eDoc. The digital signatures use X.509 certificates to assure that the Signer is who he or she claims to be. When an eDoc is eSigned with a digital signature, a cryptographic checksum is derived by calculating a value specific to the eDoc and then encrypting the checksum with a private signing key.

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<sup>6</sup> The PDF format and signatures are standardized in ISO 32000-1 and ISO 19005-1 (www.iso.org).

<sup>7</sup> See <http://tools.ietf.org/html/rfc2315>

This encrypted cryptographic checksum or digital signature is embedded within the eDoc. As a result, if the eDoc changes in any way, the digital signature will no longer be valid when recalculated. Each time a Signer eSigns an eDoc, a new cryptographic hash value using an MD5 algorithm is calculated for the eDoc and a new PDF document identifier is generated. When viewing PDFs, the digital signature is represented by a signature field containing the name and further attributes of the Signer.

The System employs a second type of digital signature on the eDocs (“Certification Signature”). A Certification Signature protects eDoc integrity, facilitates proof of who signed the eDoc and contains an additional feature that allows the creator of the eDoc to define the types of changes a Signer may perform on the eDoc, such as who is able to eSign the PDF and where the eSignatures are to be located. Certification Signatures are used for documents requiring eSignatures from multiple Signers. eDocs will have multiple signers (an FA and at least one Applicant).

The use of Certification Signatures will “lock down” the eDoc content so that no changes other than the attachment of eSignatures are allowed, and will define the eSignature areas in each eDoc. Through the use of a Certification Signature, multiple Signers are able to determine that previous Signers did not alter the eDoc content, and that the only action by such previous Signers had been eSignature execution.<sup>8</sup> Users of Adobe Reader<sup>9</sup> are able to view the protected eDocs (including the FA and Applicant eSignatures), validate digital signatures, and generally verify eDoc integrity.

#### **(h) Access to Signed eDocs**

A confirmation email is sent to each Applicant listing the acknowledged or eSigned eDocs, and providing a hyperlink to each eDoc. When clicked, the hyperlink redirects the Applicant’s browser to a custom URL specific to that Applicant.

As noted above, all eDocs are presented as ISO-standard PDFs. PDF presentation software is built into the eSignature Platform; there is no need for the Applicant to download and install software to perform the eSigning Process. However if the Applicant downloads the PDF and does not have a PDF reader installed, the Applicant will not be able to access the downloaded document until they download PDF reader.<sup>10</sup>

#### **(i) Audit and Logging of Events**

The eSignature Platform retains a log of events (“Audit Log Information”) related to each eAnnuity transaction. Events and information logged generally include the following:

- Signer’s digital signature cryptographic hash values;
- Recognition that an Applicant’s name and SSN were verified;

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<sup>8</sup> See generally [http://www.adobe.com/security/pdfs/acrobat\\_livecycle\\_security\\_wp.pdf](http://www.adobe.com/security/pdfs/acrobat_livecycle_security_wp.pdf)

<sup>9</sup> See <http://get.adobe.com/reader/>

<sup>10</sup> A PDF download icon will be presented along with the eDocs at the time of Applicant download. Additionally, the download screen will contain FA contract information with an invitation to the Applicant to contact the FA for paper copies of the eDocs, if, for some reason, the Applicant is unable to download the eDocs via the System.

- Recognition of the presentation and acceptance of the ECD;
- Method of authentication (such as date of birth and the last four digits of the Signer’s SSN or the number of questions in which the answers are known only to the Applicant. Each authentication method is stored in a separate event);
- Recognition that an eSigning PIN was created;
- Recognition that an Applicant viewed an eDoc;
- Certificate information (i.e., the name of the Signer and an object identifier (“OID”),<sup>11</sup> a unique identifier for the Signer’s certificate (“Serial Number”) and each cryptographic hash value;
- Acknowledgment that the eAnnuity transaction was completed;
- Recognition that an eAnnuity transaction was converted to a paper-based annuity transaction prior to completion as an eAnnuity transaction.

Each action or event has an Audit Log Transaction Identifier (“Audit Log Transaction ID”), a date and time of the event, and who performed the action. All of which is also part of the Audit Log Information. Audit Log Information is contained in an XML Audit Trail (“Audit Trail”). Each Audit Trail is specific to a uniquely identified eAnnuity Order. The entire Audit Trail is digitally signed with a X.509 certificate-based digital signature. The Audit Trail is returned in the SOAP message when the eDocs are uploaded from the eSignature Platform to the Secure Portal.

#### **(j) Retention of the eAnnuity**

The System retains the eDocs for the period of time dictated by the business process.

The System retains and manages eDocs in a production database for active eAnnuity transactions, which makes the eDocs readily available to Signers and other authorized users throughout the course of the eAnnuity transaction. In the event of a litigation hold, the database logic makes it possible, on a moment’s notice, to archive and/or retrieve eDocs at any level of granularity required by the hold – whether a single eDoc pertaining to one eAnnuity transaction, or all of Jackson’s eAnnuity pipeline.

eDocs are checked out of the database when they are moved to the Annuity Center or on to the eSigning Platform, and checked back in to be “locked down” as outlined above. The eDoc database also has its own audit logs all activity accessing the database, which logs are maintained and preserved as part of the System Audit Trail. eDocs are automatically removed from the eDoc database into a records management system once the associated eAnnuity transaction has been consummated and the eDocs are no longer in an “active” state, but need to be preserved for posterity.

eDocs cannot be physically deleted from the System’s database by any user or application other than a system administrator; and any such deletion will be recorded in the System’s audit logs. However, an eDoc can be logically deleted by any party having such authority granted by its

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<sup>11</sup> The OID is of type 0.9.2342.19200300.100.1.1, which represents a person or a computer user identifier. The value of the OID is set to the Signer’s User ID.

owner. Additionally, any eDoc changes will be reflected in “versions” of the eDoc, and versioning activity will be reflected in the System’s audit logs.

All eDocs presented to an Applicant, whether for viewing or for action shall be retained as legal records of the transaction. Each eDoc contains metadata that includes the date on which an eDoc is created (i.e., date/hour/seconds to the 10<sup>th</sup> of a second), distributor name, and the prescribed retention period expressed by an expiration date (which does not imply the actual termination or record destruction date).