

Global Financial Services Company Implements Defensible Disposal Program, Including Remediation of All Legal Holds

CASE STUDY



LIGHTHOUSE

Lighthouse's Advisory Services team developed and implemented a strategic five-step plan that enabled a leading financial services company to remove blockers for data disposal and drastically lower risk and costs related to over retention of data.

What They Needed

A global financial services company sought to dispose of legacy data that had been over retained due to inadequate systems and processes for the end-to-end management of records, including the ability to identify, classify, retain, preserve, protect, and dispose of information. Over retention of data leads to numerous risks (including privacy, security, and litigation) as well as substantial added costs. The company needed a strategic plan to remove blockers for data disposal posed by their legal holds and to develop a short- and long-term plan for the disposal of eligible data.

\$20M
IN COST SAVINGS
OVER 5-YEAR PERIOD

How We Did It

Lighthouse's Advisory Services team quickly jumped into action to develop the business case for a defensible disposal program, in part, by identifying major blockers for the deletion of data and a path forward. The business case included a cost model to show the cost and risk savings over a five-year period associated with the short- and long-term disposal plan. The first step, however, was to remediate the bank's legal hold list, which was incomplete, outdated, and did not contain enough details about the hold to preserve data. Lighthouse's legal hold remediation plan contained five milestones from gap assessment to the implementation of a new preservation strategy for data under legal hold. These five milestones are bolded below.

Lighthouse's Advisory Services team first conducted a **gap assessment**, which began as working sessions with the client's project team and key legal stakeholders to review the company's existing legal hold policies and procedures, as well as any known lists and potential gaps. From there, our team reviewed the existing documentation and conducted additional interviews with regional heads of litigation regarding regional practices and risks. Upon completion of our assessment, we prepared a report summarizing our findings, operational maturity, and risk rating based upon industry view and provided recommendations for future-state legal hold framework development.

Once the client reviewed and agreed to our team's recommendations, we developed a **future state legal hold framework**, which encompassed changes to shore up gaps identified by our team, including changes

to policy and governance framework, roles and responsibilities, use of technology, and scoping of holds and preservation. Specifically, Lighthouse recommended a global standard for preservation and a centralized, regionally managed process to ensure consistency and the maintenance of a global list of legal holds as the “single source of truth.” Lighthouse presented two support models, each with benefits and limitations, to ensure scalability across one thousand legal holds globally. The Lighthouse and client teams came together over a working session to review and document these proposed changes and developed a roadmap with specific steps that would take the client from its current state to its desired state.

With this new roadmap in place, our Advisory Services team conducted a **legal hold list clean up**, where we normalized existing lists (formal and informal) for attorney confirmation. The team conducted working sessions with the client’s project team to resolve orphaned and closed matters with open holds and discussed options for pre-scoping relevant data sources. We also broke out the legal hold list by responsible parties, and worked with those parties, as well as regional litigation teams, to validate and re-scope legal holds where needed. Finally, we revised a new list based upon the information we gathered and shared it with the client’s teams.

With the latest legal hold list, we **implemented a new legal hold policy framework**. Our Advisory Services team developed documentation to support the new legal hold framework (e.g., policy, procedures, RACI, quick guides, and controls/reporting) and met with the client’s litigation and investigation teams to strategize rollout. Lighthouse then trained all responsible staff on how to effectuate legal holds under their newly formed policy, and rolled out revised documentation to support the new policy.

After this step was complete, the two teams came together to **implement a preservation strategy** for data under hold. Based upon the newly revised list, we provided a plan to:

- re-issue legal hold notices for active matters, as needed;
- lift legal holds no longer needed;
- physically preserve high-risk sources; and
- develop a strategy for collection for remaining sources wherever it was required.

Our Advisory Services team supported the financial services company in implementing these within a six-month timeframe.

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CLIENT

The Results

Our Advisory Services team successfully supported the client in developing a business case for defensible disposal that established cost savings in excess of \$20M over a five year period, plus additional risk savings (e.g., privacy, litigation, regulatory risk). In addition, it developed and implemented a strategic five-step plan to completely overhaul their legal hold framework, removing the single biggest barrier for disposal.



About Lighthouse

For 25 years, Lighthouse has provided innovative software and services to manage the increasingly complex landscape of enterprise data for compliance and legal teams. Lighthouse leads by developing proprietary technology that integrates with industry-leading third-party software, automating workflows, and creating an easy-to-use, end-to-end platform. Lighthouse also delivers unique proprietary applications and advisory services that are highly valuable for large, complex matters, and a new SaaS platform designed for in-house teams. Whether reacting to incidents like litigation or governmental investigations, or designing programs to proactively minimize the potential for future incidents, Lighthouse partners with multinational industry leaders, top global law firms, and the world's leading software provider as a channel partner.

Contact us to find out what Lighthouse can do for your business.

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