

# Information Governance Services for Smarsh

Smarsh clients are taking proactive steps in the management of corporate communications to reduce their compliance risk and mitigate the rising cost of data management. With the Smarsh archive in place, further enhancements can help address broader challenges with corporate data across a diverse set of enterprise end-users that strengthen the ROI on this investment. FTI Technology provides a comprehensive suite of services to provide comfort that regulatory obligations are satisfied and business objectives are met.

## REGULATIONS

### Record Keeping:

SEC 204(2)

FCA Chapter 9

MiFID II - Article 16

FINRA 2210

FINRA 4511

FINRA Notice 10-06, 11-39, 17-18

### Storage:

SEC 17a-4

CFTC 1.31

MiFID II - Article 72

The pace of enterprise technology advancements, quickly developing regulations and data privacy laws make corporate record keeping and information management a challenge. The accelerating pace of business data growth only adds to the complexity faced by companies today.

These ongoing challenges make it difficult to craft and manage records retention policies and schedules to ensure regulatory compliance and control, maintain visibility, and minimize the risk of exposure of vital company records and operational data. Additionally, the opportunity to collapse multiple legacy archives onto a single platform helps to further build the business case.

### Navigating a Complex Data Puzzle

FTI Technology can assist various departments that need access to company records for differing business needs at the policy layer. This enables the company to fully address questions about why data is being stored, whose data is retained, what data is being preserved and which pieces of the data are being disclosed. Records Management requirements such as retention schedules, legal citations and the overall records inventory, including archived communications data, must be met in accordance with records keeping and storage regulations. Legal departments need to be able to defensibly perform legal holds and ensure compliant preservation and collection of data. And legal teams must be able to fully address the scope of e-discovery needs for investigations and litigation, reviewing data from a wide range of sources. All of these use cases rely upon the comprehensive source catalogue that connects retention obligations with the data needed to support the business, legal, privacy and IT teams.

When managing this complex data layer, knowing what to keep/delete, from who and what to hold/collect, and what information to disclose is made even more challenging in a global business and regulatory environment. A key component of this information layer for all use cases is communications data, which has only

increased in recent years in many new applications and is often starting to surpass email in volume. Using and enhancing a Smarsh archive helps your company maintain control over a wide variety of communications data and ensures that risks are reduced for numerous stakeholders across many use cases.

### A Range of Services

To address these challenges and to support integration across the information data layer, FTI Technology offers services across all aspects of deployment and delivery, including regulatory and compliance services, implementation services and managed services.

#### Regulatory & Compliance Services

- Data and archiving strategy that pre-empts emerging regulatory issues and themes that need to be addressed (e.g. ensuring compliance with record keeping obligations for BYOD and ephemeral messaging applications including WhatsApp and WeChat)
- Supporting regulatory dialogue during and post implementation to ensure regulatory acceptance of the solution
- Aligning internal stakeholder groups and navigating the approvals process

#### Implementation Services

- Design, development and implementation of policies, procedures and a target operating model to achieve defensible data archiving and minimization restoration and deletion across all businesses and geographies
- Apply ‘security-by-design’ principles to mitigate against inappropriate access of sensitive data and maintain data sovereignty
- Integration with in-scope data sources, migration of data from legacy archives and data stores together with necessary data remediation to ensure a full and accurate data position is achieved and controls are in place to maintain this position

- Downstream integration of Smarsh archive solution with end-user teams across the enterprise, including legal, investigations, disputes, regulatory compliance and privacy teams
- Build-out a suite of holistic reports to provide a global view of data archives, OPEX savings and key insights

#### Managed Services

- Day-to-day management of global archives leveraging FTI’s follow-the-sun client services model
- Business-as-usual optimization and rollout of additional features and functionality as per Smarsh roadmap and client requirements

### The FTI Advantage

#### Enhanced ROI on Smarsh Deployments

Through our proven approach, clients have defensibly disposed of petabytes of data and released millions of pounds in OPEX savings due to reduction in data storage, termination of software license agreements, decommissioning of IT systems and closure of data centers.

#### Proven ability to deliver global, technology-led transformation

FTI Technology is one of a few trusted Smarsh partners with a hands-on approach to supporting implementations. FTI experts have won a prestigious award for providing implementation support to a global bank for a Smarsh Enterprise Archive platform.

#### Strong reputation within the financial services industry and with global regulators

FTI has an outstanding reputation in the financial services industry and with regulators around the globe. FTI’s team of 7,600 professionals in 31 countries are relied upon as providers of advice and expert evidence in a wide range of matters. Our expertise has earned FTI the position as advisor to nine of the world’s top 10 bank holding companies.

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