

# Top 5 US Insurance Company

Insurance company uses ZL UA to construct full information governance framework that encompasses compliance, records management, eDiscovery and file archiving capabilities.

## CUSTOMER PROFILE

### INDUSTRY

Insurance

### SIZE

12,000 active broker-dealers

### HEADQUARTERS

Illinois, USA

### BUSINESS REQUIREMENTS

FINRA, SEC 17a-4, NASD 3110 & 3111 compliance, post-review monitoring, file archiving, records management, eDiscovery

## SOLUTION SUMMARY

### SOLUTION

ZL UA

Compliance Manager  
Records Manager  
Discovery Manager  
File Archiving

### LEGACY ENVIRONMENT

EMC Legato  
EMC SourceOne  
MS Exchange  
Oracle 11g Database  
3-4 PB in file shares & SharePoint  
1+ billion messages  
250 TB SourceOne migration

## BACKGROUND

This customer began as a small personal insurance provider in the Northeastern United States in the mid 1960's and has grown to be one of the largest insurance companies in America today. It now serves several million households nationwide and owns and operates companies spread throughout the United States and internationally. It prides itself on adopting a people-first attitude towards preparing and protecting their customers for any future insurance needs.

## CHALLENGE

### Compliance

The customer was initially looking for a solution to fit their compliance needs, specifically one that would allow them to easily track and monitor their compliance with FINRA, SEC17a-4 and NASD 3110 & 3111, which mandate proactive monitoring and review of broker-dealer communications for financial institutions.

For any organization, the worst nightmare an IT or legal team can face is not having sufficient evidence to present to the government or a regulator upon request. The client was using EMC SourceOne at the time, which shared many issues with

EMC EmailXtender, lacking adequate deletion and search capabilities. EMC Legato, their data backup and recovery suite, was unable to scale to their massive user base resulting in a severe "over-review and oversampling of communications." The IT team faced multiple challenges including determining which communications to flag, how to efficiently review all flagged communications, how to identify items for deletion, and how to audit user actions.

The ultimate goal was to ensure the company could produce the proper data to satisfy regulators' requests. Faced with these challenges, the customer turned to ZL UA to solve their compliance concerns. With ZL UA, the customer was not only able to provide multiple groups of users access to the same data to meet regulatory standards, but they were also able to build an information governance framework that allowed for future big data projects, such as file archiving and eDiscovery, to be built into the system at a later date.

### File Archiving

A few years later, this customer also approached ZL Tech with an archiving project that involved the ingestion of 4 petabytes of data stored in their file share and SharePoint system.

With so much data in their system, the

customer wanted to archive and perform defensible disposition to optimize their storage costs. However, it was difficult to find the proper balance between retention and disposition while remaining defensible. If they deleted too much data they would run the risk of spoliation, but if they kept too much data, they would pay to store potentially risk-laden ROT (Redundant, Obsolete and/or Trivial) data.

With multiple projects and data governance goals in front of them, the customer wanted to find a comprehensive solution that used the fewest number of products possible. What differentiated ZL from other solutions was its unified platform that provided universal access to a single unified dataset.

#### WHY ZL?

### Meeting Current and Future Compliance Regulations

Due to the customer's desire to focus on compliance regulations for broker-dealer relationships, specifically NASD 3110 and 3111, ZL Compliance Manager was the ideal choice to meet their needs. ZL's post-review monitoring capabilities enabled the customer to use highly customizable lexicons to automatically apply tags to messages based on a variety of specific factors.

In the past, reviewers spent a significant amount of their time bogged down by manual search and review of key data. Through proactive flagging and sorting features, ZL Compliance Manager allowed the company's reviewers to review all flagged communications by simply accessing their review inbox. This method of flagging messages as they are ingested helped to mitigate potential compliance violations, reduce false-positives, and ensure all compliance requirements were met without oversampling.

Additionally, ZL Compliance Manager also

allows mandated users to view audit trails for full transparency on user actions. In the past, audits were performed through a manual process, meaning that the chain of custody was broken once data was exported, and the burden of manual data tracking fell on the users.

ZL UA's central system audits allow for all flagged data to be easily reviewed, and compliance managers can also receive instant updates about the actions of their fellow reviewers. This makes it significantly easier for companies to identify internal risks and noncompliance.

### File Archiving with Records Management

The customer's desired file archiving project was simple in theory, yet complex in practice. They wanted to decrease their storage footprint by deleting a large amount of data, but it needed to be done defensibly.

ZL stressed that both tasks should be performed within a single system to achieve 100% defensibility. If, instead, the customer opted to use multiple tools by multiple vendors to complete the process, they would risk disjointed retention policies and duplicate data, which would undermine defensibility.

ZL File Archiving allows the customer to define a file's lifecycle once it is ingested, as it retains only one data copy regardless of whether multiple applications or users need access to it. Because only a single copy exists in the archive, all compliance retention policies, legal holds and other IT retention policies seamlessly coordinate the proper actions without the need for cumbersome communication between multiple data systems/silos.

ZL Records Manager works hand-in-hand with ZL File Archiving to accomplish the customer's desired project, as it allows each file to be categorized according to policy rules that dictate the each file's retention

cycle. By proactively applying retention policies to all data, the lifecycle of content is properly defined, ensuring data can be safely deleted without fear of spoliation. With these policies in place, the customer was able to reduce their storage cost with the assurance that all their storage is used purposefully.

#### RESULTS

The customer was able to leverage ZL UA to create a single strategy that helps them manage data in one unified framework. As part of that framework, ZL Compliance Manager provides the customer visibility into their data environment to ensure all actions taken in the system can be defended and accounted for. Additionally, ZL File Archiving and Records Manager work together to safely delete ROT data, thereby preventing storage buildup and any spoliation concerns. Furthermore, long-term business records are managed in-sync with all other relevant processes like legal holds or retention for SEC/FINRA compliance requirements.

Once the customer successfully completed their original projects, they went on to implement ZL Discovery Manager, enabling the customer to perform eDiscovery across all enterprise content. With ZL Discovery Manager, any legal holds placed on files are instantly incorporated into the document's lifecycle in accordance with its records policies.

Evolving from a simple compliance request, this customer eventually used ZL UA to implement a full suite of information governance functions, from records management to eDiscovery. ZL's versatility allowed the customer to add various modules and capabilities over time to keep up with the ever changing big data landscape, becoming a key part of the customer's long-term data management strategy.