

Netradyne Legal Hold Process

v1.0

Internal and Confidential

Table of Contents

[Netradyne Legal Hold Process 0](#_Toc191552162)

[1 Purpose 2](#_Toc191552163)

[2 Scope 2](#_Toc191552164)

[3 Roles and Responsibilities 2](#_Toc191552165)

[4 Procedure 3](#_Toc191552166)

[4.1 Responsibilities 3](#_Toc191552167)

[4.2 Litigation Hold Request Process 3](#_Toc191552168)

[4.3 Compliance & Record Keeping 4](#_Toc191552169)

[4.4 Key Contacts 4](#_Toc191552170)

[5 Conduct 4](#_Toc191552171)

[6 Exception 4](#_Toc191552172)

[7 Terms/Acronyms 4](#_Toc191552173)

[8 References 4](#_Toc191552174)

[Policies 4](#_Toc191552175)

[Process/Procedures 5](#_Toc191552176)

[9 Appendix A: Document RACI Matrix 5](#_Toc191552177)

Document Control

|  |  |
| --- | --- |
| **Document ID** | NDLH202502 |
| **Document Name** | Netradyne Legal Hold Process |
| **Document Status** | Draft |
| **Document Released Date** | 27-Feb-2025 |
| **Document Author** | Priyesh Parashar |
| **Document Content Contributors** | Chethan Gangaraju, Kavitha Shetty, Garima Bhatt, Kathy Pearson & Dev Zaveri |
| **Document Signatory** | Saravanan Sankaran |
| **Document Owner** | Priyesh Parashar |
| **Document Version** | V1.0 |
| **Information Classification** | Internal |

**Document Edit History**

|  |  |  |  |
| --- | --- | --- | --- |
| **Version** | **Date** | **Additions/Modifications** | **Prepared/Revised By** |
| 1.0 | 27-Feb-2025 | SOP for Legal Hold and Mailbox retention | Priyesh Parashar |
|  |  |  |  |
|  |  |  |  |

**Document Review/Approval**

|  |  |  |  |
| --- | --- | --- | --- |
| **Date** | **Signatory Name** | **Organization/Signatory Title** | **Comments** |
| 03-Mar-2025 | Saravanan Sankaran | VP – IT & Infosec |  |
|  |  |  |  |
|  |  |  |  |

**Distribution of Final Document**

|  |  |
| --- | --- |
| **Name** | **Organization/Title** |
|  |  |
|  |  |
|  |  |

# Purpose

The purpose of this SOP is to establish a structured process for initiating, approving, enabling, disabling, and reviewing litigation holds to ensure compliance with legal and regulatory requirements.

# Scope

This SOP applies to all legal hold requests raised by the HR and Legal teams, ensuring proper approval and review before actioning by the Risk & Compliance group.

# Roles and Responsibilities

Roles and responsibilities specific to this document are included below:

|  |  |
| --- | --- |
| **Role** | **Responsibilities** |
| Owner | * Team or SME responsible for the process area needs to ensure this document is up to date and compliant with governing requirements. * Is the point of contact for the document. * Responsible for initiating and managing document review and the approval process from start to finish including gathering or delegating the collection of content including diagrams, formatting etc. as well as identifying stakeholders to participate in the peer review process. |
| Reviewers/Stakeholders | Representations from teams that can affect or be affected by the document under review (e.g., Operation, Security, Compliance, Quality) |
| Approvers | The Person(s) of authority to validate the document and sign-off on the latest version. Such Person include Document owner, Functional Team Lead, Security Lead, Product Delivery Lead. |
| Document Release | Document Owner/team to work with repository administrator to make release version available. |

# Procedure

## 4.1 Responsibilities

## 4.1.1 Request for US/Europe

HR Team / Legal Team: Responsible for raising the litigation hold request using the Legal Hold Template.

* Approvers:
* Level 1 Approval: Kathy Pearson (HR Team)
* Level 2 Approval: Dev Zaveri & Christina Hough (Legal Team)
* Level 3 Approval: Saravanan Sankaran (Infosec)
* IT Group: Responsible for enabling and disabling legal hold on 365 accounts
* Risk & Compliance Group: Responsible for reviewing legal hold accounts every six months

## 4.1.2 Request for India

HR Team / Legal Team: Responsible for raising the litigation hold request using the Legal Hold Template.

* Approvers:
* Level 1 Approval: Pooja Madappa (HR Team)
* Level 2 Approval: Dev Zaveri & Christina Hough (Legal Team)
* Level 3 Approval: Saravanan (Infosec)
* IT Group: Responsible for enabling and disabling legal hold on 365 accounts
* Risk & Compliance Group: Responsible for reviewing legal hold accounts every six months

## 4.2 RACI Matrix for Litigation Hold Process

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Task** | **HR** | **Legal** | **Infosec** | **Risk & Compliance** | **IT** |
| Submit request for legal hold | R | R | - | - | - |
| Approve legal hold request | A | A | A | - | - |
| Enable/Disable legal hold | - | - | - | - | R (Upon Approval from Saravanan) |
| Monitor alerts/audit trails | - | - | R | R | - |
| Govern mailbox access | - | - | R | - | - |
| Access end-user data | - | A | - | - | - |
| Access list of legal hold users | R | R | R | - | - |

**Key:**

* **R (Responsible)** – The person/team responsible for executing the task.
* **A (Accountable)** – The person/team who makes the final decision and is ultimately accountable.
* **-** – Not involved in the task.

## 4.3 Litigation Hold Request Process

* **Step 1: Raising a Legal Hold Request**

The HR or Legal team must submit a Service Desk Plus (SD+) request using the standardized Legal Hold Template - [Legal Hold](https://itservicedesk.netradyne.com/app/itdesk/ui/requests/add?reqTemplate=155142000041152519)

The request should include:

* Employee details (Name, Employee ID, Department)
* Reason for legal hold
* Expected duration
* Any supporting documentation
* **Step 2: Approval Process**

The request will go through the following three levels of approval:

* Level 1 Approval – HR Team (Pooja/Kathy – based on region)

The HR team verifies the need for a legal hold and approves/rejects the request.

If approved, the request moves to Level 2.

* Level 2 Approval – Legal Team (Dev Zaveri & Christina Hough)

The legal team reviews the request for compliance and necessity.

If approved, the request moves to Level 3.

* Level 3 Approval – Infosec (Saravanan)

Infosec team ensures all security implications are addressed.

If approved, the request is forwarded to the IT Group.

* **Step 3A: Enabling Litigation Hold (by IT Group)**

Once all three approvals are obtained, the IT Group will process and enable the litigation hold.

A confirmation will be sent back to the requestor upon completion.

* **Step 3B: Disabling Litigation Hold (by IT Group)**

If a request for removal of a litigation hold is raised, it must go through the same approval process as enabling.

Once all three approvals are obtained, the IT Group will process and disable the litigation hold.

A confirmation will be sent back to the requestor upon completion.

* **Step 4: Periodic Review**

Every six months, the Risk & Compliance Group will conduct a review of all active litigation hold accounts.

Necessary actions will be taken based on the review findings (extension, modification, or removal of the hold as required).

## 4.4 Compliance & Record Keeping

All litigation hold requests and approvals must be documented and stored securely for audit and compliance purposes.

Any updates or removals of legal holds must follow the same SD+ request and approval process.

## 4.5 Key Contacts

|  |  |  |  |
| --- | --- | --- | --- |
| **Name** | **Contact** | **Email ID** | **Role** |
| Kavitha Shetty | 8884107307 | kavitha.shetty@netradyne.com | Risk and Compliance |
| Garima Bhatt | 9916322439 | garima.bhatt@netradyne.com | Risk and Compliance |
| Chethan Gangaraju | 9916322439 | chethan.gangaraju@netradyne.com | IT |
| Priyesh Parashar | 9845227014 | priyesh.parashar@netradyne.com | IT |
| Dev Zaveri | 619-206-7768 | dev.zaveri@netradyne.com | VP - Legal |
| Kathy Pearson | 619-520-8651 | kathy.pearson@netradyne.com | VP - HR |
| Pooja Madappa | 9880297653 | pooja.madappa@netradyne.com | SVP - HR |
| Saravanan Sankaran | 9444161422 | [saravanan.sankaran@netradyne.com](mailto:saravanan.sankaran@netradyne.com) | Dept. Head - Info Security & IT |

## 

## 4.6 Work Level Instruction

1. Log in to [Microsoft 365 Admin Portal](https://admin.microsoft.com/%23/homepage).
2. Go to **Active Users**, find the desired user.

A screenshot of a computer

Description automatically generated

1. Click on **Mail** tab.

A screenshot of a computer

Description automatically generated

1. Scroll down and click on **Manage litigation hold**.

A screenshot of a computer

Description automatically generated

1. Check the box enable litigation hold as seen below.

A screenshot of a computer

Description automatically generated

1. To disable litigation please uncheck the above option.

Note- that the minimum Microsoft 365 license required to enable **Litigation Hold** is **Microsoft 365 E3** or **Exchange Online Plan 2**, business standard will not work.

Once you enable the Litigation Hold, please ensure that that user in question is updated in the Litigation Hold excel at [**LitigationHoldUsers.xlsx**](https://netorg726775.sharepoint.com/:x:/r/sites/IT/_layouts/15/Doc.aspx?sourcedoc=%7B80B888D8-8E02-4722-B52C-500D234BB29F%7D&file=LitigationHoldUsers.xlsx&action=default&mobileredirect=true)**.**

# Conduct

Compliance Checks to this process to be performed through various methods, including but not limited to reports, internal/external audits, Awareness training/assessments and feedback to the process owner. Non-compliance will be escalated to the Netradyne leadership team.

# Exception

Exception to this procedure must be approved through the Netradyne Exception Process.

# Terms/Acronyms

|  |  |
| --- | --- |
| **Term/Acronym** | **Definition** |
| FTE | Full Time Employee |
|  |  |

# References

## Policies

[Netradyne Information Security Policy & Procedure.pdf](https://netorg726775.sharepoint.com/:b:/r/sites/NETRADYNEDOCUMENTMANAGEMENTPORTAL/Shared%20Documents/General/ISMS%20Published%20Documents/ISMS%202023/Netradyne%20Information%20Security%20Policy%20%26%20Procedure.pdf?csf=1&web=1&e=mRSIq4)

[Netradyne Information Security Exception Process.pdf](https://netorg726775.sharepoint.com/:b:/r/sites/NETRADYNEDOCUMENTMANAGEMENTPORTAL/Shared%20Documents/General/ISMS%20Published%20Documents/ISMS%202023/Netradyne%20Information%20Security%20Exception%20Process.pdf?csf=1&web=1&e=RbfEhO)

[Netradyne Acceptable Usage Policy.pdf](https://netorg726775.sharepoint.com/:b:/r/sites/netradynenet/IT%20Policies/Netradyne%20Acceptable%20Usage%20Policy.pdf?csf=1&web=1&e=31N8Oy)

[Netradyne Change Management.pdf](https://netorg726775.sharepoint.com/:b:/r/sites/netradynenet/IT%20Policies/Netradyne%20Change%20Management.pdf?csf=1&web=1&e=M3CiBY)

[Netradyne Incident Management.pdf](https://netorg726775.sharepoint.com/:b:/r/sites/netradynenet/IT%20Policies/Netradyne%20Incident%20Management.pdf?csf=1&web=1&e=bRgrgI)

[Netradyne Information Technology Policy and Procedure.pdf](https://netorg726775.sharepoint.com/:b:/r/sites/netradynenet/IT%20Policies/Netradyne%20Information%20Technology%20Policy%20and%20Procedure.pdf?csf=1&web=1&e=W8DFbs)

[Netradyne Problem Management.pdf](https://netorg726775.sharepoint.com/:b:/r/sites/netradynenet/IT%20Policies/Netradyne%20Problem%20Management.pdf?csf=1&web=1&e=9kHFfB)

[NetradyneOpen-SourceSecurityPolicy.pdf](https://netorg726775.sharepoint.com/:b:/r/sites/netradynenet/IT%20Policies/NetradyneOpen-SourceSecurityPolicy.pdf?csf=1&web=1&e=V1cDgs)

## Process/Procedures

[NETRADYNE DISASTER RECOVERY PROCESS.pdf](https://netorg726775.sharepoint.com/:b:/r/sites/NETRADYNEDOCUMENTMANAGEMENTPORTAL/Shared%20Documents/General/ISMS%20Published%20Documents/ISMS%202023/NETRADYNE%20DISASTER%20RECOVERY%20PROCESS.pdf?csf=1&web=1&e=xTyHtp)

[NETRADYNE BUSINESS CONTINUITY PLAN.pdf](https://netorg726775.sharepoint.com/:b:/r/sites/NETRADYNEDOCUMENTMANAGEMENTPORTAL/Shared%20Documents/General/ISMS%20Published%20Documents/ISMS%202023/NETRADYNE%20BUSINESS%20CONTINUITY%20PLAN.pdf?csf=1&web=1&e=eCZUy6)

[NetradyneSecurityIncidentResponsePlan.pdf](https://netorg726775.sharepoint.com/:b:/r/sites/NETRADYNEDOCUMENTMANAGEMENTPORTAL/Shared%20Documents/General/ISMS%20Published%20Documents/ISMS%202023/NetradyneSecurityIncidentResponsePlan.pdf?csf=1&web=1&e=Nzo34K)

[Netradyne-Access\_Control\_matrix.xlsx](https://netorg726775.sharepoint.com/:x:/r/sites/IT/Shared%20Documents/Netradyne-Access_Control_matrix.xlsx?d=wb9f6587abe8c430da5d988e9ecf307f5&csf=1&web=1&e=Miojp2)

# Appendix A: Document RACI Matrix

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Role/Activity | Document Owner/Functional Area Lead | Document Contributor | ND Leadership | Functional Area Team | InfoSec | All ND Member(s) |
| Ensure document is kept current | A | R | I, C | R, C | C | I |
| Ensure stakeholders are kept informed | A | R | - | R | C | - |
| Ensure document contains all relevant information | A | R | I, C | R, C | C | I |
| Ensure document adheres to document governance policy | A, R | R | I | R, C | R, C | I |
| Provide SME advice | I, R | A, R | I | R, C | I, C | I |
| Gathering and adding document contents | I | A, R | I, C | R, C | C | I |
| Document Approval | A | R | I, R | I | I, R | I |

|  |  |
| --- | --- |
| Key |  |
| R | Responsible |
| A | Accountable |
| C | Consulted |
| I | Informed |