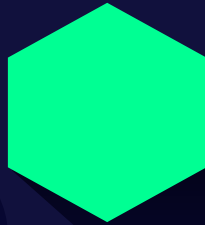
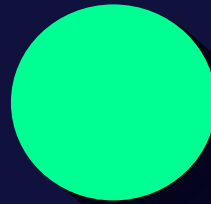
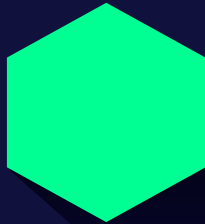




OpenMarket®



Keylight

By NAVEX Global®

OpenMarket
Keylight® Case Study

173 Contracts.
254 Compliance mandates.
9700 Contract demands.
1 GRC platform.

Thanks to the Keylight Platform,
OpenMarket's custom controls framework
can meet ever increasing business and
security requirements.

How does a hyper growth mobile messaging company get serious about maturing its compliance processes in an industry known for disruption and change?

The company in question, OpenMarket, a global leader in mobile messaging, relies on the Keylight Platform, to be more responsive and proactive with meeting ever growing security requirements imposed by contracts, laws and standards.

OpenMarket, a division of Amdocs, (NASDAQ: DOX), is a Seattle-based company that helps big brands use

mobile messaging to connect with their customers in the moments when it counts. OpenMarket offers a suite of mobile products, including SMS messaging (text) and MMS messaging (text with images, audio, video). In fact, four of the top 10 global brands rely on OpenMarket's cloud-based Mobile Engagement Platform to engage with their customers and employees better.

However, back in 2011 when Jeff Lowder, CISO and CPO (Chief Privacy Officer) of OpenMarket, joined the company, there was less structure and more free-wheeling.

"We had more of a startup mentality, so there was a lot of tribal knowledge and undocumented processes," said Lowder.

For OpenMarket to continue its growth trajectory, the company had to evolve from its existing model of compliance performed by service teams relying on user-based tools like spreadsheets. In fact, global brands had begun asking for security requirements that OpenMarket couldn't meet with current processes. As such, the company needed a more streamlined, yet comprehensive approach to compliance in



Jeff Lowder, CISO and CPO (Chief Privacy Officer) of OpenMarket speaking at the 2016 Lockpath Ready Summit.

order to do business with global enterprises.

Fortunately, OpenMarket already had the right person for the job; one who spent two decades in information security before joining the company. Lowder's first order of business was selecting a governance, risk management, and compliance (GRC) platform to help manage the company's information security program. After conducting a thorough review, OpenMarket selected Keylight, a cloud-based GRC platform from Lockpath.

Lowder and his team now use Keylight to manage a custom controls framework that Lowder developed based on NIST and ISO standards.

Compliance challenge

OpenMarket has 254 compliance mandates related to 28 U.S. federal laws, regulations and rules, eight international laws, four international and national standards, untold state laws, not to mention 17 unique partnering standards required for business engagements. That's not even counting the 173 customer contracts with over 9700 contractual obligations.

Suffice it to say, OpenMarket's challenge is arduous, and enterprise customers can be very exacting in their contracts. It takes a GRC platform like Keylight to ensure compliance on this scale. The alternative, spreadsheets, which OpenMarket used before

Keylight, would have been a nonstarter.

Importance of change management

As OpenMarket's CISO and CPO, Lowder championed the company's compliance maturation process but not without encountering headwinds. Resistance typified organizational change like questioning the need or wondering why certain steps were now required.

"Organizationally, our company wasn't going about compliance in the right way," said Lowder.

Lowder had a few tricks up his management sleeve. To sell his program internally, he drew inspiration from the company's

mission statement and its reference to trust. Rather than referencing ISO 27001 in his information security program name, he labeled the program, "Enterprise Trust Initiative." Lowder packaged the program's value proposition as "increasing customer trust in OpenMarket by providing services that allow us to manage information risk to the right level at the right cost."

Lowder set about building a custom controls framework in Keylight. One key result was the OpenMarket Controls Catalog that acts as a unified repository for all requirements: controls, compliance mandates, contract specifics, and more.

Leveraging NIST

In building OpenMarket's custom controls framework,

family, OpenMarket has a reliable baseline for creating future controls.

Incorporating ISO 27001

While NIST is a U.S. standard and favored by Lowder, OpenMarket's global business necessitates also complying with ISO 27001, which is more accepted in the EU and around the world. OpenMarket uses the standard for information security risk management, everything from root-cause analysis and corrective actions to capturing OpenMarket's risk rating and third-party risk rating.

By using Keylight, Lowder was able to assemble ISO/IEC 27001 controls, NIST controls and the custom NIST control family into the OpenMarket Controls Catalog. The advantage? One control complies with many regulations.

Mapping controls

Compliance mandates are uploaded to Keylight and mapped to controls. For example, if one customer has a contract requirement while another customer requires them to follow ISO, it's all documented in Keylight. Lowder can then go to a control record and see all the associated compliance mandates and contractual obligations that are managed by that control. For every peer who inquires, Lowder can find the definitive answer in Keylight. This builds trust and contributes to a unified approach to compliance.

OpenMarket. On compliance.

OpenMarket uses Keylight and its custom control framework to comply with the following regulations, standards, and requirements:

NIST



US - FEC



US - Federal Regulations



European Regulations



ISO



US - FDIC

ANTI CRAMMING

US - Anti-Cramming

GENERAL HARDENING

General Hardening



173 Contracts



OpenMarket Enterprise Trust



US - FTC



Canadian Regulations

ACCEPTABLE USE

Acceptable Use

By using Keylight, Lowder was able to assemble ISO 27001 controls, NIST controls and the custom NIST control family into the OpenMarket Controls Catalog.

These two tactics were instrumental in establishing trust with Lowder's peers and the executive team, so he could pursue building OpenMarket's information security program. Packaging compliance not just as a cost of doing business but as essential for growing OpenMarket's business made all the difference.

Building a custom controls framework

With management buy-in on the Enterprise Trust Initiative and a growing chorus of peers singing the praises of compliance,

Lowder's framework of choice has been NIST, specifically NIST SP 800-53. OpenMarket adopted all 18 control families in the NIST framework, plus created a 19th custom control family.

"Does it fit into the NIST base control? If it doesn't, I'll create a custom base control," said Lowder.

The NIST framework also offers control enhancement, which adds to the base control by making it more specific or stringent. Between NIST and their custom

Having compliance mandates in Keylight and mapped accordingly, Lowder, as CISO, can speak definitively when called upon to explain new security processes. At any time, Lowder can use Keylight reports and data to support his recommendations to management.

Keylight's flexibility

OpenMarket uses Keylight to manage and integrate the 250+ compliance mandates, plus all the customer contracts and their information security management system (ISMS). Keylight's broad configuration capabilities allow Lowder to quickly construct a format capable of supporting all of OpenMarket's requirements. "What we do in Keylight would be impossible to do in Excel," said Lowder.

By importing NIST and ISO 27001 controls and relying on Keylight's flexibility, Lowder and his team had what they needed to build an expanded controls framework in the company's ISMS within Keylight. But what Lowder needed to power the framework was more accurate documentation.

Documenting controls management

With controls in place and mapped to requirements, the next step was documentation. With Keylight, documentation meant populating the platform with author-generated content. The starting point wasn't ideal. "I had literally thousands of records with unknowns because of the granularity," said Lowder. "I don't want to know whether or not someone claims to do it, I want to understand how they're doing it."

Consequently, documentation became a detailed intake process, which took time and technology. For example, compliance mandates are identified followed by the applicable stipulations. Then both are mapped to the OpenMarket Controls Catalog. OpenMarket took full advantage of Keylight's bulk import, which greatly sped up the process of bringing data into Keylight.

Setting the company standard

For Lowder, documentation wasn't enough. He wanted all information vetted and standardized because users weren't documenting to the degree required. OpenMarket turned to face-to-face interviews even though it meant more time invested for the security team. Why?

"People didn't understand what the requirement really meant,

"Keylight is worth at least two full-time employees. The accuracy of mapping authority documents and citations to controls give us the credibility to be effective. We would not be successful without it."

so it was a lot of garbage in and garbage out data," said Lowder. "From a workflow perspective, a vetted approach is ideal."

Lowder's team used the control data in Keylight to gather information in the interview process. Existing data served as thought starters and referencing the data aided discussions of technical aspects that are only truly understood by the interviewee. In short, is it like this? Yes/no?

Control data that's vetted with the "how" clearly articulated helps ensure OpenMarket has

a controls framework that works in the moment and going forward.

In control

For Jeff Lowder, the lead architect and practitioner of OpenMarket's custom controls framework, the pace of change and disruption hasn't let up. With Keylight and their custom control framework, OpenMarket can remain nimble and responsive to demands from brands.

"Keylight is worth at least two full-time employees. The accuracy of mapping authority documents and citations to controls give us the credibility

to be effective. We would not be successful without it."

The OpenMarket Controls Catalog, the ISMS, NIST, ISO - everything is in Keylight and accessible, which makes everyone more efficient and effective. For Lowder, the struggles from when he began are history. Compliance, once a weakness, is now a strength.



"What we do in Keylight would be impossible to do in Excel"

Jeff Lowder,
CISO and CPO of OpenMarket

About Lockpath

Lockpath is an enterprise software company that helps organizations understand and manage their risk. The company's line of integrated risk management solutions provides companies with the means to efficiently and effectively identify, manage, and monitor risks, for a more agile and resilient business. Lockpath serves a client base of global organizations ranging from small and midsize companies to Fortune 10 enterprises in more than 15 industries. The company is headquartered in Overland Park, Kansas. For more information on Lockpath, visit [Lockpath.com](https://lockpath.com).



Lockpath[®], the Lockpath icon[™], Dynamic Content Framework[™], Keylight[®], and Blacklight[®] are property and trademarks of Lockpath, Inc. and registered in the United States. The trademarks and names of other companies and products mentioned herein are the property of their respective owners.
© 2019 Lockpath, Inc. All rights reserved.