Using Signal or WhatsApp for Work? Here's a Checklist of Compliance and Security Considerations

Consumer privacy: better than nothing...

Consumer messaging apps like Signal and WhatsApp prioritize individual privacy through end-to-end encryption. That means that messages are fully encrypted before leaving your mobile device and aren't decrypted until after reaching your recipient's device.

But, they lack centralized enterprise controls that are crucial for regulatory, statutory, and legal compliance, as well as best practices for organizational security and policy requirements. Signal and WhatsApp have:

- ***No*** centralized user management
- ***No*** audit trails / retained archives
- ***No*** centralized remediation controls (e.g. admin initiated remote wipe)
- ***No*** centralized policy enforcement
- And, ***No*** centralized way to define who can speak with whom

Just a sampling of what you'll need to address with policies, procedures, and compensating technologies...

Onboarding/Offboarding

- Determine involved conversation participants
- Notify conversation owners for participant removal
- Alert owners when to shut down specific conversations
- Reevaluate participant presence in conversations

Collection/Reconstruction of Audit Trails

- Collect phones of participants
- Manually review and capture relevant communications
- Exclude non-relevant communications
- Assign responsibility for this activity
- Securely store and verify newly reconstructed archives

Remediation/Risk Reduction

- Disappearing Messages (***Note***: Can impact audit trails)
- Adopt Mobile App/Device Managers (***Note***: May incur costs)

Policy Enforcement

- Implement Endpoint Management
- Use Mobile Application Management

Note: Costs may apply and may not work on new devices brought in for incident response

Federation Governance/Participant Management

- Define authorization for adding external participants
- Establish conversation participation moderation/ termination
- Report unknown/unverified participant additions

Special Note

Given the U.S. Department of Justice's stance on ephemeral messaging, and regulatory actions by the SEC, CFTC, and other international bodies, organizations should emphasize preserving and accessing relevant communications on platforms like Signal, WhatsApp, and iMessage.

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