



Information Security Risk Management Best Practices

INFORMATION SECURITY DECISIONS

FINANCIAL

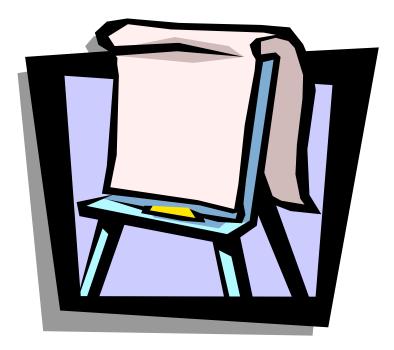
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Agenda

- Info Security Policy
- Assessing Risk
- Info Security Strategy
- Senior Engagement
- Insiders/Outsiders
- Incident Response
- Q&A







• Granularity: Board vs. Operating

- Fingerprints Matter
- Effective Training
- Enforcement is Critical
- Can't Regulate Everything
- Policy vs. Standard vs. Guideline





Info Security Policy

- Board
 - Program requirement
 - Defines roles & responsibilities
 - Reporting
- Operating Examples
 - User administration
 - System administration
 - Change control
 - Usage (systems, social media, etc.)
 - Retention



Assessing Info Security Risk

- The key is in capturing the complexity
- This is a <u>relative</u> risk exercise, not an <u>absolute</u>
- The <u>overwhelming</u> make-or-break factor is the organization's willingness to be honest
- What you think you "know" can, and probably will, work against you with dangerous consequences
- This exercise is quite a bit <u>easier</u>, and <u>harder</u>, than you think





Four Focal Points

- Internal Systems
 - Owner: IT
- Applications / Data
 - Owner: Business or IT
- Physical Records
 - Owner: Individual Departments
- Third Parties
 - Owner: Relationship Managers



Data Inputs

INFORMATION SECURITY DECISIONS

- Classification (type and sensitivity)
- Quantity (large, moderate, small, none)

- Access method(s) (Who, how, why, when)
- Threats ("What could go wrong?" exercise)
- Vulnerabilities (The biggest moving part)









Risk Mitigation

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- Internal controls
- Governance
- Testing
- Training
- Insurance
- Monitoring
- Recovery

Note that some
apply individually
and some apply
globally. This must
be factored in.

The net of mitigation is the residual risk.

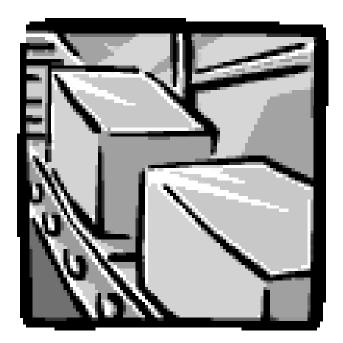




FINANCIAL INFORMATION SECURITY DECISIONS

Outputs

- Residual risk ratings
 - Ideally by system, app/data, physical sites, third party
- Documentation
- Reporting
- Strategic plans







Info Security Strategy

- Be very clear on responsibility
- Requires a base understand of risk
- Drive from the risk assessment
- Must demonstrate clear value
- Don't band aid program
- Strategy & compliance
- Align with Corp. strategy?



Management Engagement

INFORMATION SECURITY DECISIONS

- Language, language, language
- Awareness breeds engagement
- Must be safe to be ignorant
- Info must be digestible
- What is the value proposition?
- Competition is your friend
- Your ace in the hole: fear







Threat Management

Internal

• The message: 1) We're watch and 2) we'll prosecute

- Why we do training
- Monitoring
- Auditing
- External
 - The castle walls are probably high enough
 - Third parties are a bigger source of risk





Incident Response

- Unpreparedness is inexcusable!
- Who will:
 - Run point?
 - Communicate with execs, media, regulators, investors, customers, staff?

- Oversee account fraud alerts and risk mitigation?
- Coordinate with law enforcement?
- Learn from prior events
- Test, test, test





Final Thoughts

INFORMATION SECURITY DECISIONS

• Program can't be managed to the 80/20 rule

- Single best thing you can probably do to improve your program is fix your data inventory
- The second best thing is fix your policies
- Third is tighten up vendor management
- Fourth is improve your documentation
- Fifth is develop and publish residual risk ratings
- Finally, get more people in the conversation