

Deloitte. THIRD PARTY DATA EXCHANGE

CASE STUDY:

Personal info of 84,000 people on a Memory Stick

IT COULD HAPPEN TO ANYONE!!

LOST!!

- * Define what a Breach is
- * Help customers understand!

Awareness! Sensitivity

- * Include language in the contract
- * Conduct on-site assessments of service providers

Service Providers MUST understand!

- * Be strategic

Where do you want to end up?

- * Have an organizational & culture that supports the roadmap

Risk Assessment
Spend resources appropriately

- * Due diligence BEFORE you enter into a contract

Includes on-site review

Verifiable Trust IT

Early warning signals BEFORE things become a problem

IRS

BUILDING STATE, LOCAL & FEDERAL PARTNERSHIPS

Call for HELP!

Relationship Management

Look more closely at reports on an annual basis

Coordinate: come up with something that works for everyone

It's our data; we HAVE to make sure protections are in place



RISK-BASED APPROACH:

PROPRIETARY APPROACH, there's lots of info out there

- * What relationships do you really want to evaluate?
- * Mission-critical Relationships
 - Don't have to look at everything
 - Define what you want to look at
- * What do 3rd Parties have access to & what do they do with it?

What you see vs. what is executed is not necessarily the same

LIMIT THE RISK

Set the RIGHT People Involved

SYNERGY OF COMPLIANCE & RISK

Ever-Changing Threat

If you're starting to show up as a pain in the butt to the vendor, you're probably approaching appropriate execution.

CHALLENGES:

- * Competing Standards
- * LOD Questionnaires/MBS
- * Increasing Costs
- * Inefficiencies

There are tools being developed

CONSIDERATIONS

COMMUNICATING AFTER A BREACH:

- * Situational - Regulatory Requirements?
- * Get the right people involved
- * Don't be too quick sending letters
- * Response Plan needs to be in place
- * Set up a Call Center if you're sending notification

Often multiple sets of notices!

Is there agreement?

Ask what happened?

ACCOUNTABILITY

RESTORE CONFIDENCE

STOP

CAN WE DEVELOP A STANDARD APPROACH?

RESPONDING TO 3RD PARTY BREACH:

- * Find out what their response has been
- * Gap analysis: Remediation plan

Reputation Risk?

Do I need to involve law enforcement?

Are they the only provider?

What is the cross-functional impact?

Is it a systemic problem?

May want to use a hybrid approach

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