

# Hardening Defense in Depth Cyber Risk Management Principles with Integrated Regulatory Risk Management

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riskconnect®  
Integrated Risk Management Solutions™

**RISK & INSURANCE**

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## SPONSOR: RISKONNECT

- Riskonnect, a Thoma Bravo portfolio company, is the trusted, preferred source of integrated risk management technology, offering a growing suite of solutions on a world-class cloud computing model that enable clients to elevate their programs for management of all risks across the enterprise.
- Riskonnect, which was recognized as a Leader in The Forrester Wave™: Governance, Risk, and Compliance Platforms, Q1 2018, allows organizations to holistically understand, manage, and control risks, positively affecting shareholder value.
- For more information about Riskonnect, visit [www.riskonnect.com](http://www.riskonnect.com) or call **+1-770-790-4700**.

# PRESENTERS



**Lynn Heiberger**  
COO | Unified Compliance



**Rajesh Unadkat**  
AVP, Strategic Marketing GRC |  
Riskconnect



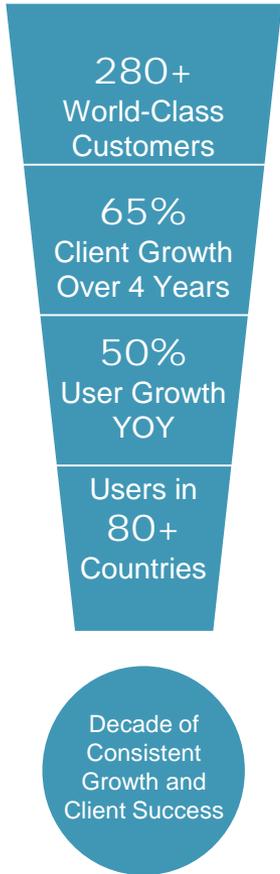
**Cameron Jackson**  
Sr. Director, Market Strategy &  
Development | Riskconnect

## Moderator:



**Dan Reynolds**  
Editor-in-Chief  
Risk & Insurance®

# Riskconnect Overview: Company Profile



## MISSION

Empower business professionals to make better strategic decisions while managing risks across their entire organization with greater transparency and efficiency.

# Riskconnect Overview: 2018 FORRESTER WAVE™ LEADER



Riskconnect Recognized as a Leader in  
The Forrester Wave™:  
Governance, Risk, and Compliance Platforms.

## Earned the highest possible scores in the following criteria:

- End User Experience
- Risk and Control Management
- Integration Capabilities
- Organizational Context
- Document Management
- Input/Output
- Distribution and Communication and Language Support

CIO JOURNAL

## CIOs Focused on Compliance as Global Rules Toughen, Says Microsoft Azure Data Chief

CIO JOURNAL

## The Morning Download: Europe's New Privacy Rule, in Unexpected Twist, Helps Facebook, Google

TECH

## Yahoo's Successor to Pay \$35 Million in Settlement Over Cyberbreach

Regulators, in a first, penalize public company that was the victim of a hack

ECONOMY | CAPITAL ACCOUNT

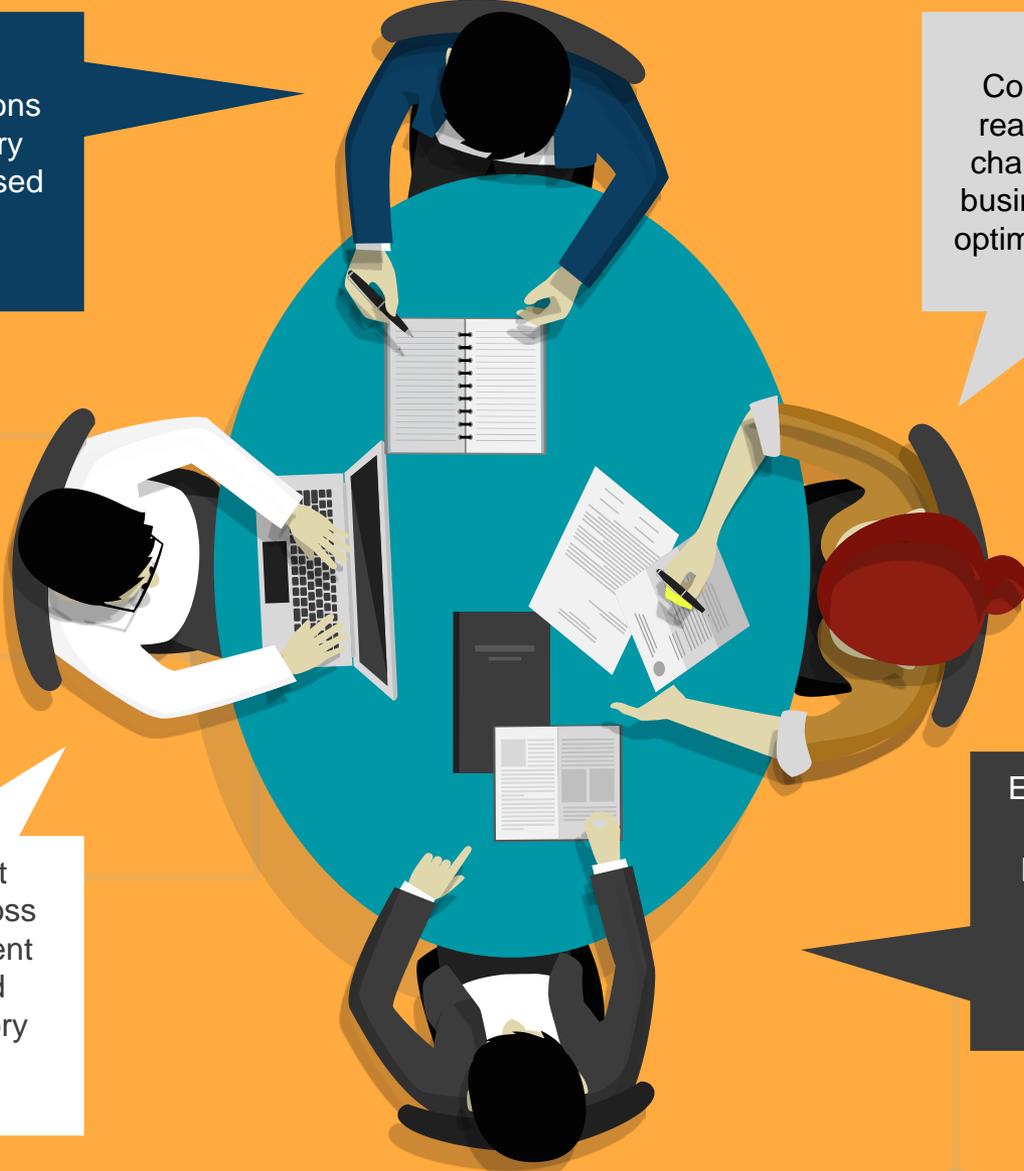
## Financial Deregulation Throws Fuel on Already-Hot Economy

Moves to ease post-crisis rules spur lending and risk-taking even as industry is lowering its own standards

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An illustration from a top-down perspective showing four business professionals in a meeting around a circular teal table. At the top, a man in a blue suit is writing in a notebook. On the left, a woman in a white shirt is using a laptop. On the right, a woman in a red top is pointing at a document. At the bottom, a man in a dark suit is pointing at a document. The table has a laptop, a notebook, and several documents on it. The background is orange with faint circuit-like lines.

Risk-based decisions demand regulatory and framework based context.

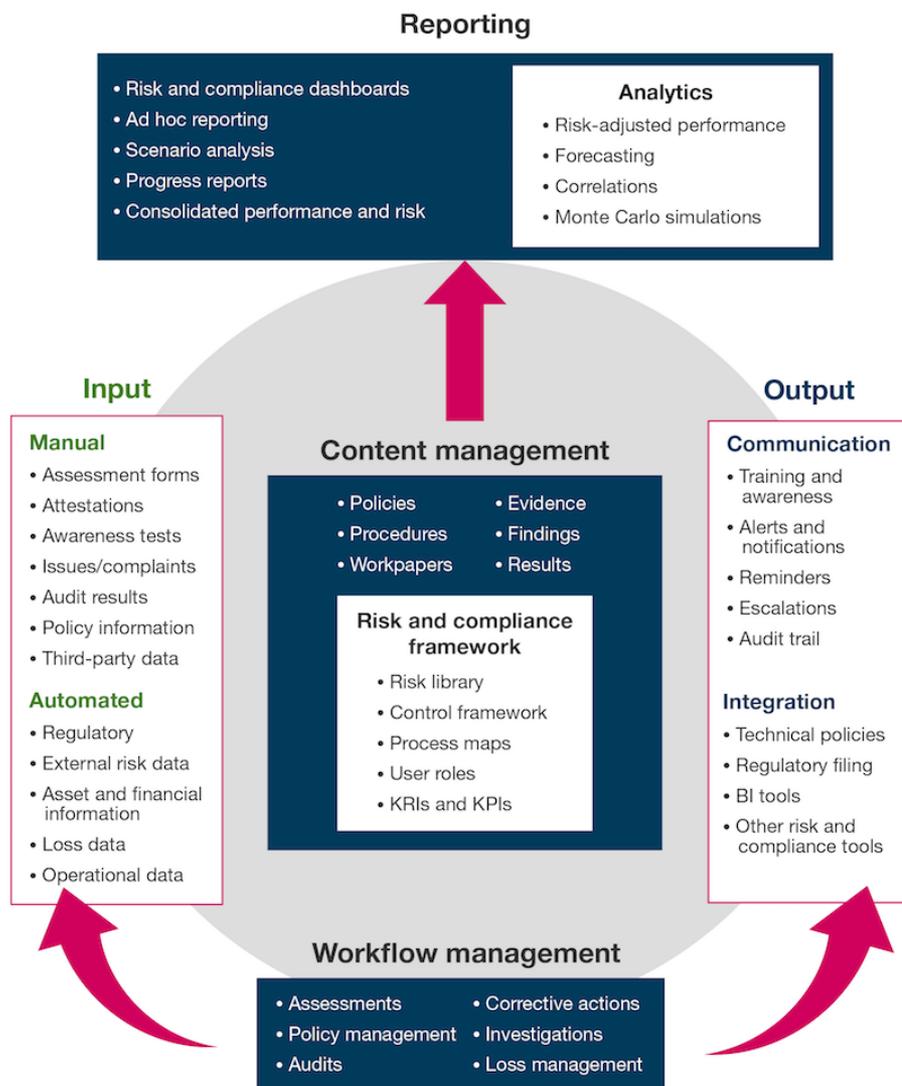
Connected POV to real-time regulatory change supports our business strategy and optimizes performance

Business Impact Assessments across all risk management functions should measure regulatory and framework implications

Embedding regulatory intelligence into the planning and design components of risk management and audit programs is essential

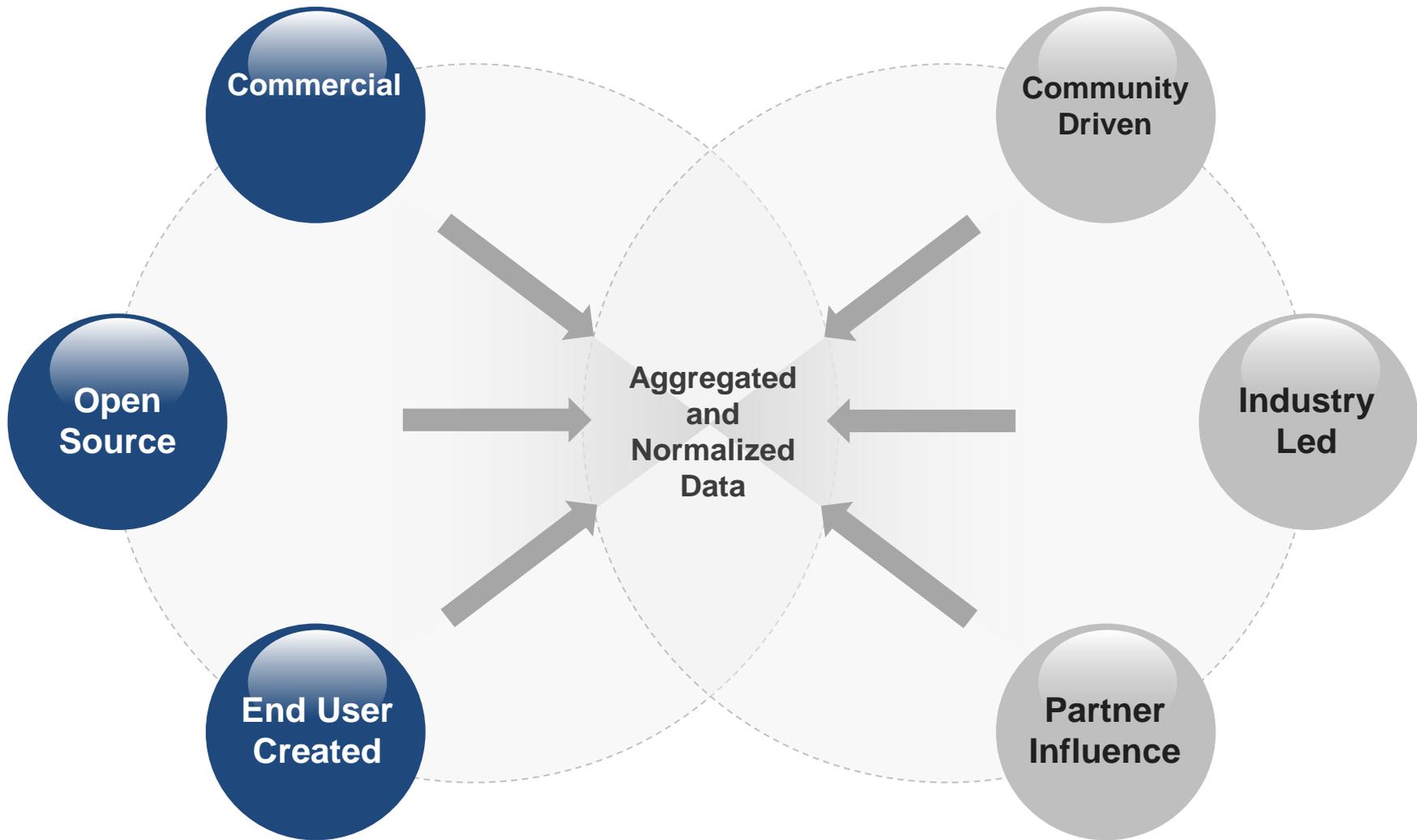
# The Criticality of Content Intelligence

FORRESTER®



Multiple vendors offer UCF, but  
how does one differentiate?

# Multi-Source Intelligence



# Profiling Intelligence Sources



## Success with Content Intelligence - The End User Experience

- Simple User Experience
- Personalization
- Automation
- Robust and Flexible Analysis (e.g. Gap Analysis, Rationalization, Redundancy)
- Defensible Positioning

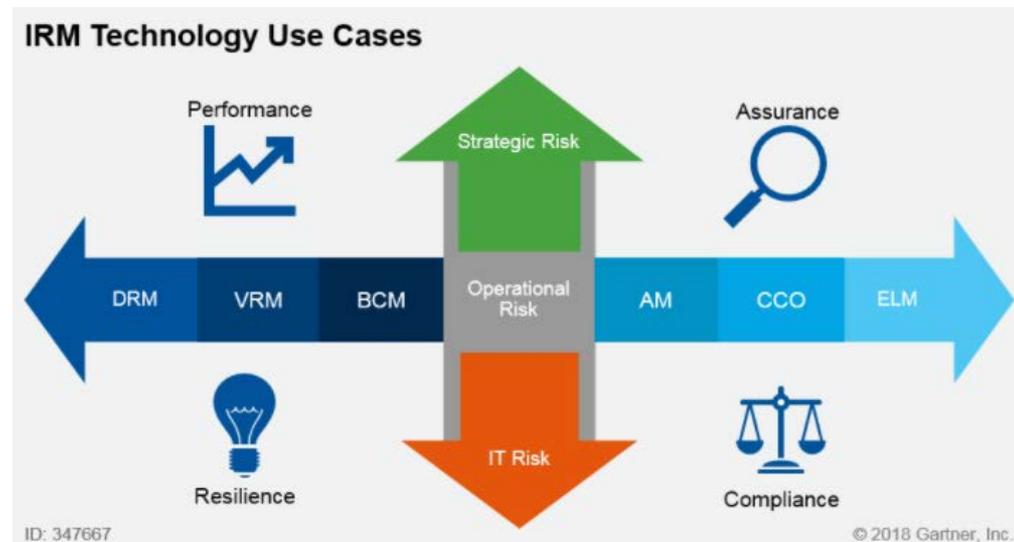
## Content must be Intelligent and Simple

- Visualization and dynamic interactive reporting is key
- Content for the sake of content does not provide value
- Many to many data models that support bidirectional interaction helps
- Connecting content to data points (e.g. risks, controls, audit plans, issues, etc.) is where the value creation originates and intelligence is born
- Geographic and industry specific capabilities is always in demand

## Key Foundational Use Cases

Integration of Content Intelligence into fundamental risk management activities:

- Policy Management
- Risk Assessment
- Business Process Modeling
- Control Design, Operation and Monitoring
- Issue and Remediation Management
- Reporting



# Unified Compliance Framework – a Common Controls Framework

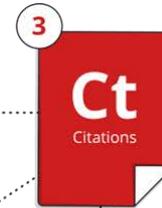
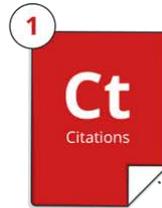
- Regulatory Nature of the Insurance Industry
- How to Simplify the Process of Compliance
- Harmonizing Controls to a Framework
- Common Language for Communication
  - Tagging Citations
  - Matching Controls
  - Creating a List of Authority Documents

# Regulatory Nature of the Insurance Industry

- Need to Keep Data Private – Federal and State
  - State Privacy Laws
  - 45 CFR Part 164 – Security and Privacy
- Comply with Requirements and Best Practices
  - NIST 800-53r4
  - ISO 27001
- Applies to All Insurance
  - Insurance Data Security Model Law, NAIC MDL-668
  - Standards for Safeguarding Customer Information Model Regulation, NAIC MDL-673
  - Privacy of Consumer Financial and Health Information Regulation, NAIC MDL-672

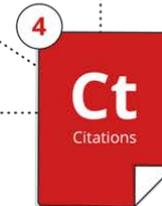
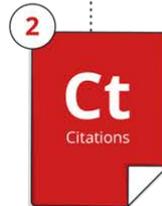
# Simplify the Process of Compliance – Identify Overlap

A data subject who can prove he/she has a legitimate interest may, upon request from the data controller, receive free of charge, without excessive waiting periods, and at reasonable intervals, the following: access to any personal data about him/her in the data controller's possession; confirmation... (Art 28(1), Art 28(3), Art 28(5), Law of 2 August 2002 on the Protection of Persons with Regard to the Processing of Personal Data)

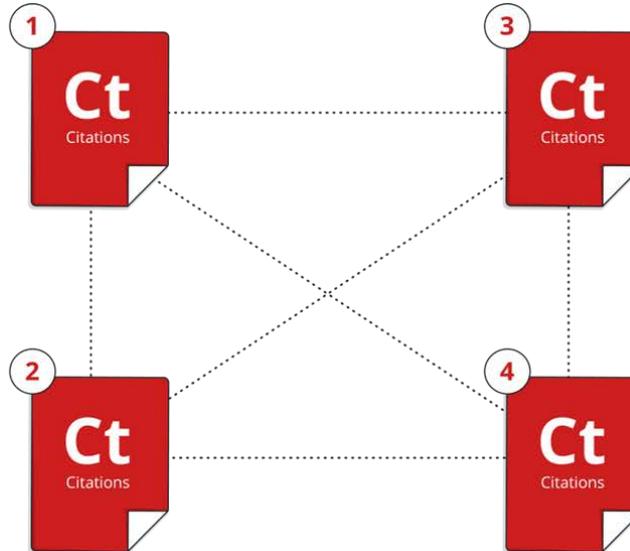


When a data subject requests information on the processing of his/her personal data, the data controller must provide it without undue delay. The information must contain the purpose of the processing; the categories subject to processing and their source; the recipients or categories of recipients;... (Art 12(1), Art 12(2), Czech Republic Personal Data Protection Act, April 4, 2000)

Individuals have the right to request access to personal data; the request must be granted within a reasonable time period. (Art 20, Japan Handbook Concerning Protection Of Personal Data, February 1998)

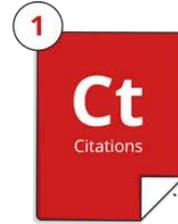


It is mandated that public institutions shall, upon request by a concerned party, reply to inquiries on, permit review of, and make duplicates of the personal data file maintained by it, unless an exception applies. (Art 12, Taiwan Computer-Processed Personal Data Protection Law 1995)

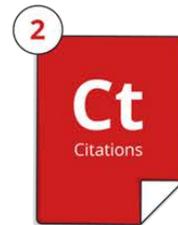


# Harmonize to a Common Control Framework

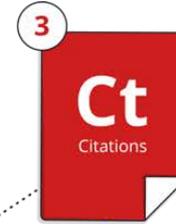
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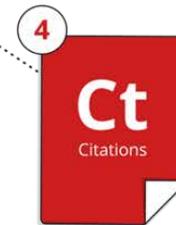
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Provide access to personal records when a personal data request is received.

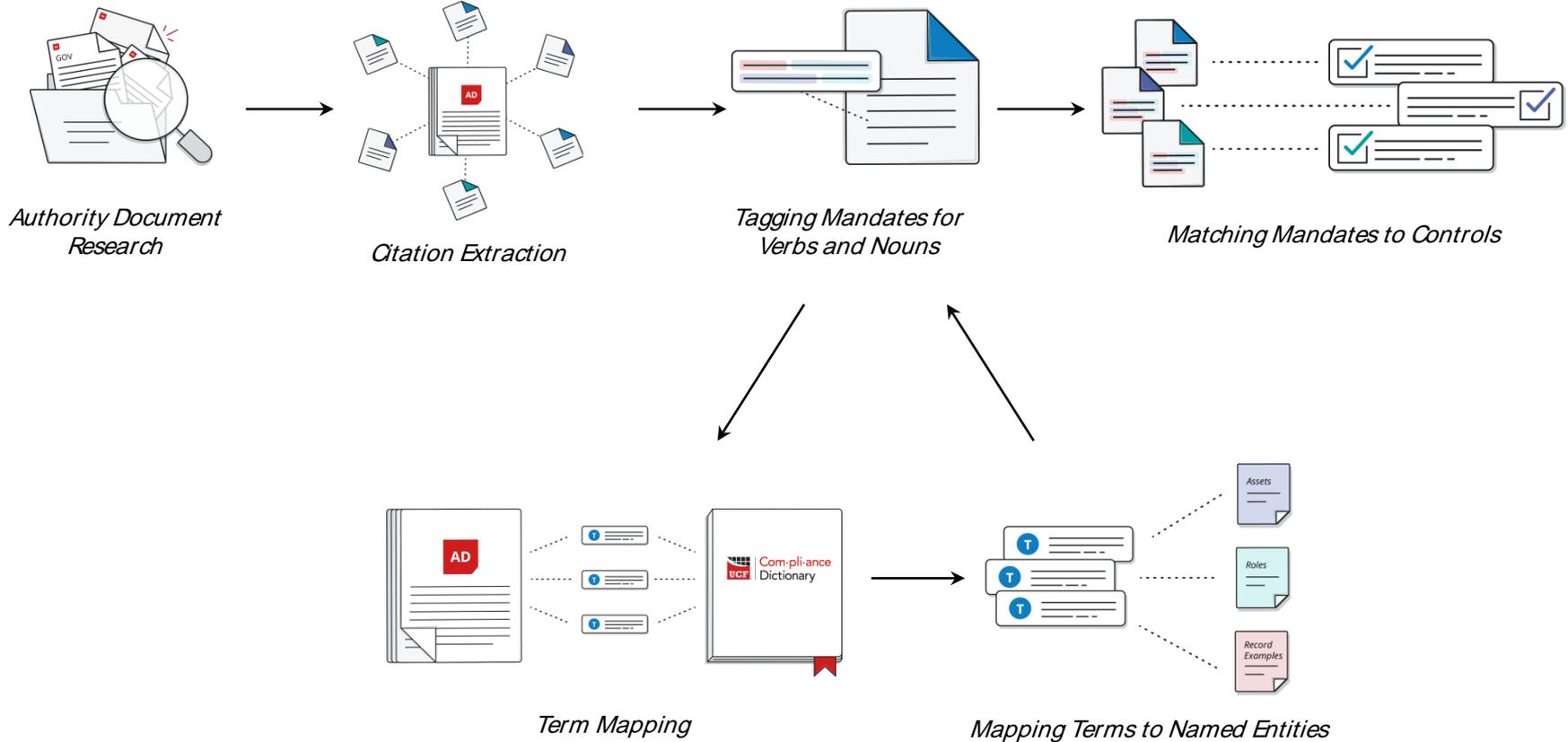


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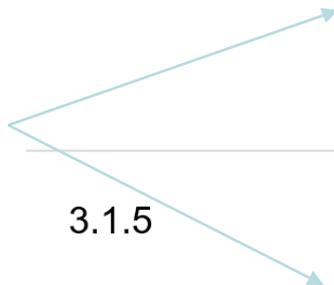
# Harmonizing Controls to a Framework



# An Example with NIST 800-171

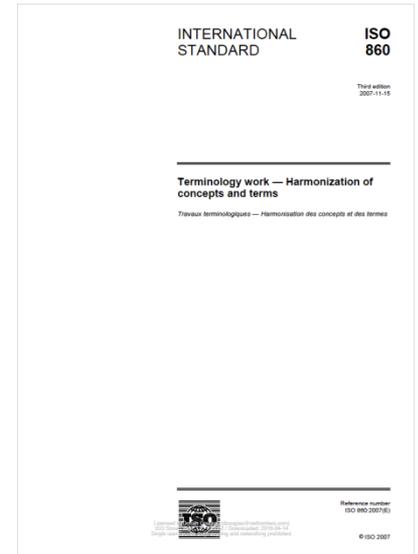
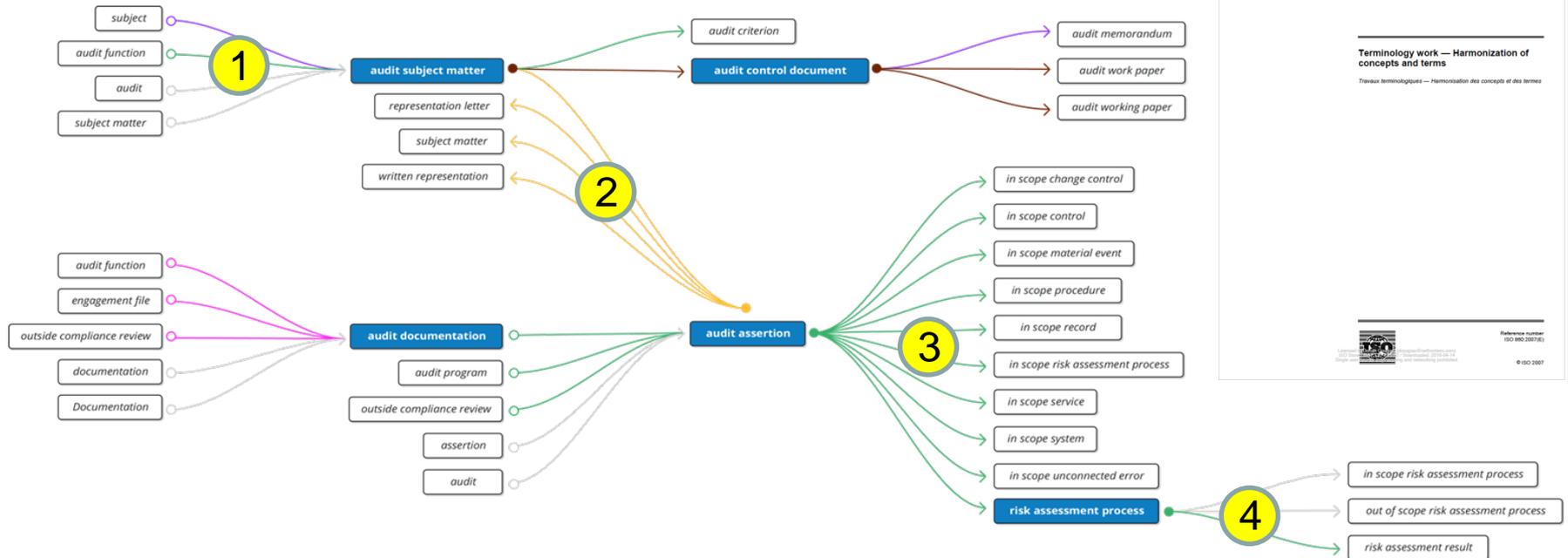
CITATION REFERENCE	NIST 800-171 CITATION GUIDANCE	CC ID	CONTROL TITLE
3.1.2	Limit information system access to the types of transactions and functions that authorized users are permitted to execute.	01411	Establish access rights based on least privilege.
3.1.5	Employ the principle of least privilege, including for specific security functions and privileged accounts.	01411	Establish access rights based on least privilege.

Different Words; Same Requirement



permitted to execute.

# Common Language for Communication - Dictionary



# Common Language for Communication – Tagging Mandates

During the **Secondary Noun Phrase** investigation **Primary Noun Phrase**

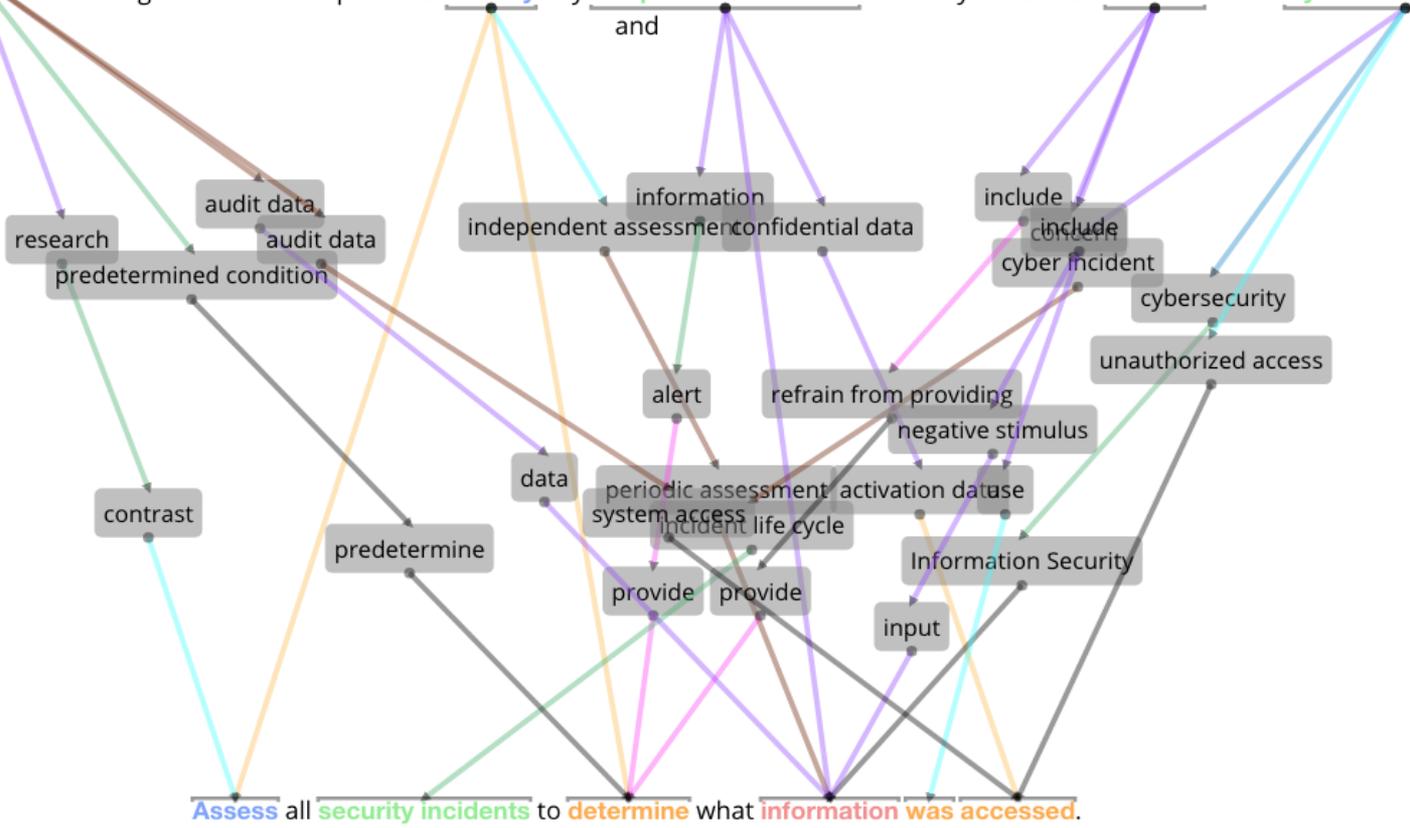
, the Licensee, or an outside vendor and/or service provider designated to act on behalf of the Licensee, shall, at a minimum determine as much of the following information as possible:

**Primary Verb Phrase** Identify **Primary Noun Phrase** any **Primary Noun Phrase** Nonpublic Information that may have been **Secondary Verb Phrase** involved **Primary Noun Phrase** in the **Primary Noun Phrase** Cybersecurity Event ; and

The licensee: **Primary Verb Phrase** Trains **Primary Noun Phrase** staff , as appropriate, to **Secondary Verb Phrase** implement the licensee's **Primary Noun Phrase** information security program ; and

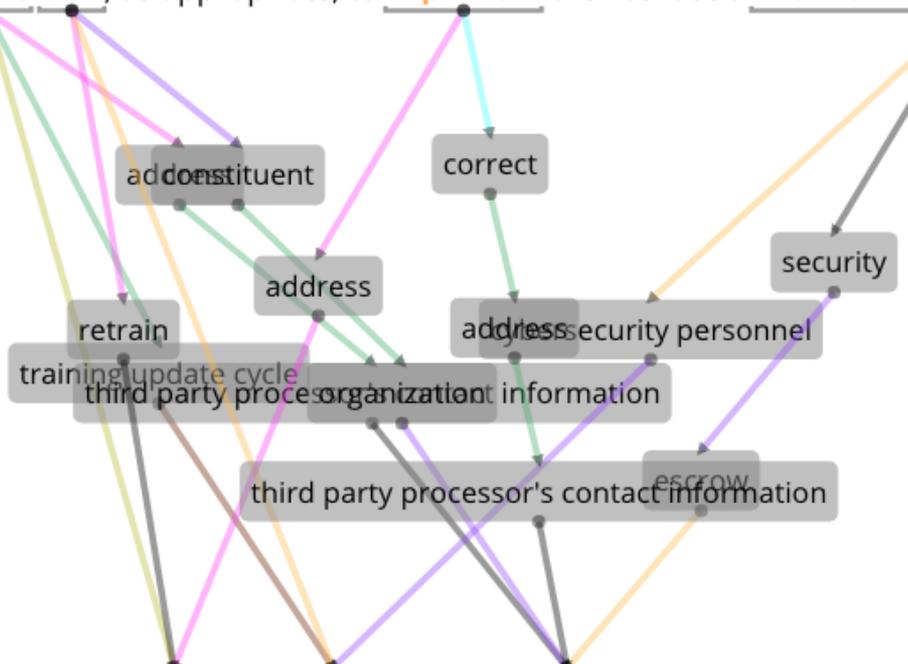
# Common Language for Communication – Matching Controls

During the **investigation**, the Licensee, or an outside vendor and/or service provider designated to act on behalf of the Licensee, shall, at a minimum determine as much of the following information as possible: **Identify** any **Nonpublic Information** that may have been **involved** in the **Cybersecurity Event**;



# Common Language for Communication – Matching Controls

The licensee: Trains staff, as appropriate, to implement the licensee's information security program; and



Train all personnel and third parties, as necessary.

# Common Language for Communication - Harmonization

- 01226 - Assess all security incidents to determine what information was accessed.
  - NAIC MDL-668 Section 5.B(3)
  - NAIC MDL-668 Section 5.B(1)
  - California OPP Notification of Security Breach Part III Timing of Notification ¶ 1
  - NIST 800-53 IR-9a
  - NIST 800-53 IR-9e
  - ISO 27001 A.16.1.4
- 00785 - Train all personnel and third parties, as necessary.
  - NAIC MDL-673 Section 7 ¶ 1.B.
  - NIST 800-53 AC-22b
  - NIST 800-53 PS-3(2)
  - ISO 27001 § 7.2 ¶ 1(c)
  - ISO 27001 § 7.2.2

## The Solution (Riskonnect)

- Riskonnect's API based integration with CCH
- Customize UCF regulations & controls for your organization
- Compare regulatory standards for overlaps and gaps analysis
- Controls Assessment / Audit, Evidence Collection & Issue Reporting
- Issue Risk Measurement and Mitigation
- Save time and money by test once report many with Common Controls

# QUESTIONS



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