# CYBERSECURITY & TECHNOLOGY RISK: AN ERM PERSPECTIVE

NYSICA 6th Annual Fraud, Integrity, and Controls Conference



# Destination Check

- An increasingly competitive global marketplace has organizations (whether publicly traded, private companies, government agencies, and non-for-profits) clamoring for better information assurance and the additional business development facilitation and performance insight enabled by technology. While IT professionals have the technical expertise necessary to ensure the secure configuration of IT hardware or proper deployment of technology solutions, their solutions frequently lack the internal control professional's perspective and ability to understand the complicated business implications, governance challenges, and risks associated with technology.
- This session will help attendees look and consider cybersecurity and technology risks from both the Board especially Audit Committee and the enterprise risk professional's perspective (whether internal control, auditor or financial perspective). Governmental agencies and industry rely on IT assets such as computers, networks, and data to interact and deliver value to the end-user (e.g., constituent or customer). Protecting these assets, as well as the constituent/customer relationship, requires that organizations of all sizes understand, assess, remediate and repair unmitigated threats to remain relevant in the marketplace and to take advantage of emerging business or service delivery opportunities.



# Joel Lanz CPA.CGMA.CITP.CFF, CISA, CISM, CISSP, CFE

Joel is a member of the Business Environment & Concepts (BEC) Subcommittee (of the CPA Exam Content Committee) and the immediate past Chairman of the AICPA's Information Management and Technology Assurance Executive Committee.

Joel also serves as a reference (non-voting) member of a \$1.2 Billion non-profit's audit committee.

Prior to starting his niche IT Audit, Information Security and Risk Management practice in 2001, Joel was a Technology Risk Partner in Arthur Andersen's Business Risk Consulting and Assurance Practice, a Manager at Price Waterhouse and a Vice President and Audit Manager The Chase Manhattan Bank.

Joel received both his BBA (Accounting) and MBA (Information Systems) form Pace University.

### Technology Risk Advisory Practice

# Thought Leadership

# **Graduate School Professor**

Joel's niche CPA practice provides technology governance, IT Audit, Information Security Management, Cyber Risk Assessment and IT Vendor Oversight services sectors since 2001.

- Editorial Board member of "The CPA Journal."
- Previously chaired both the NYSSCPA Technology Assurance and Information Technology Committees.
- Immediate Past Chair of the AICPA's Information Management and technology Assurance Executive Committee and previously Chaired the AICPA's CITP Specialist Credential committee.
- Co-chaired the AICPA's 2010 & 2011 Top Tech Task Force.
- IIA Long Island Chapter Board of Governors.

Visiting Assistant Professor in the School of Business at The State University of New York – College at Old Westbury. Courses instructed include;

- · Auditing,
- Advanced Assurance
- Forensic Accounting
- Accounting Information Systems
- · Accounting Research.

Adjunct Associate Professor at NYU Stern Graduate School of Business teaching courses in the M.S. in Accounting program. Courses taught include:

- IT Auditing
- Internal Controls & Accounting Information Systems.

Seminar and CPE Presenter for AICPA, NYSSCPA, IIA, and private CPE providers.

Publications include Journal of Accountancy, The CPA Journal and The Risk Management Association Journal.

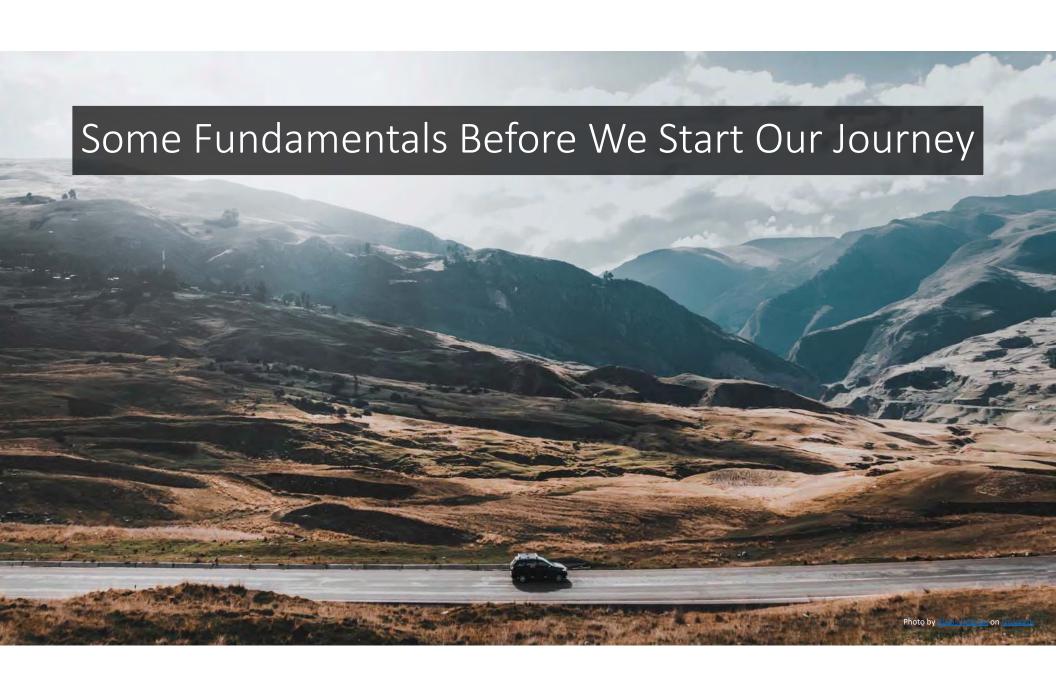




# **Disclaimers**

- I am my own person and do not speak for, endorse, represent, etc., any of the organizations, associations or universities that I am affiliated with. In other words, my opinions are my own and represent what I personally believe.
- I am not endorsing any company, service, product nor are any endorsements implied.
- I am presenting today in "the spirit of professional knowledge sharing and transfer."





# Lessons I Learned from Sitting on an Audit Committee



Cybersecurity is important – but it is not the only technology-related issue that we MUST discuss.



<u>Technology is important</u> – but it is not the only risk that we MUST discuss.



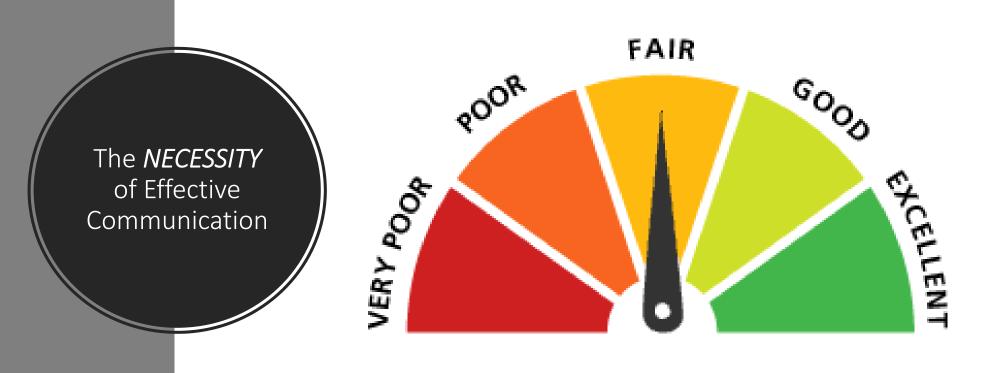
Risk is important – but is not the only governance issue that we MUST discuss.



Oh, and by the way, we MUST oversee the internal audit function, external public accountant, "coordinate" with any risk management initiatives - review policies, financial reports, complaints, fraud allegations, and perform any additional tasks assigned by the Chair of the Board.

Other things are important too

Overcoming the realistic time crunch



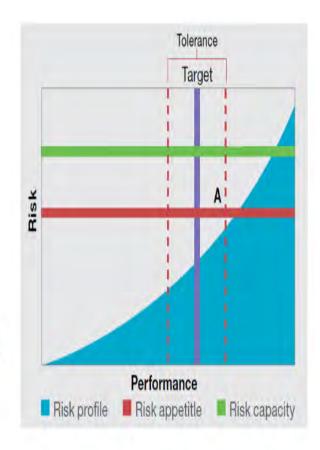
# Risk Profile (From: COSO ERM)

- An organization manages risk to strategy and business objectives in relation to its risk appetite.
- Risk appetite:
  - The types an amount of risk, on a broad level, an organization is willing to accept in pursuit of value.
- Manages risk in the context of achieving strategy and business objectives – not as individual risks.

Introduces a new depiction referred to as a risk profile Incorporates:

- -Risk
- -Performance
- -Risk appetite
- -Risk capacity

Offers a comprehensive view of risk and enables more risk-aware decision making



# Classic and Evolving Technology Musts

- Alignment of technology with business objectives
- "Fiduciary" use of technology-related investments
- Facilitating/Enabling the mission
- Safeguarding Assets (Data and Information Processing)
- Compliance with regulatory and legal expectations

- Social Media (Protect reputation and customer engagement)
- Strategic use and reliance on service providers (including cloud computing solutions)
- Mobile and other IoT strategies
- Data Governance (including Big Data, Data Analytics and Continuous Monitoring)
- Privacy
- Implementation and Monitoring of Business Systems
- Impact of Technology Risk on Reputation

# Yet Cybersecurity is the Golden Child of MUST



Some may believe that <u>concerns over cybersecurity are exaggerated</u> and as in the past, cost-effective threats can be easily managed – and that management of the problem can be relegated as in the past to the IT Department.



Others, including professional associations, reputable consultancies, think tanks, and the media, believe that this time it is different.

Cybersecurity is a <u>significant business</u> issue that <u>dramatically impacts</u> the organization's relationship with its customers, profitability and reputation.

Because <u>technology</u> is so <u>embedded</u> into the <u>business</u> – from sourcing customers to receiving and making payment – and to maintaining financial records that no longer have paper support, managing cybersecurity risks can no longer be delegated to someone other than the person or group primarily responsible for the business.



Many Board members and Executives have come to the conclusion that it is a Business issue – (TARGET AND SONY ATTACKS WERE THE TURNING POINT!! (or any other attack that has received significant media coverage).

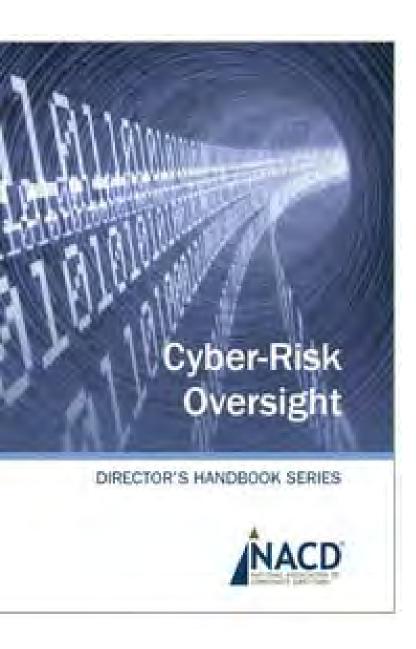


In many aspects the theoretical differences between information security and cyber security <u>are immaterial</u> as far as Audit Committee and Executive Management responsibilities go.

So Why Does
Cybersecurity
Keep <u>Some</u>
Audit
Committee
Members Up
At Night?

Assumption that breach will occur—AND surviving the aftermath of "the event"

- <u>Amount of potential loss (financial, reputational, lost opportunities)</u>
- <u>Sophistication</u> and purpose of the attack
- Frequency and velocity of the attacks
- · Information outside the organization
- Negative publicity
- <u>Evolving</u> insurance coverage and underwriting requirements
- <u>Lawsuits</u> from stakeholders (shareholders, customers, partners, unforeseen parties)
- <u>Regulatory</u> expectations and "suggestions"
- "<u>Helpful advice</u>" from accounting, law firms and vendors
- <u>Guidance from recognized</u> authorities and associations.



# Guidance Issued By The NACD

The National Association of Corporate Directors (NACD), issued a publication, "Cyber-Risk Oversight Handbook." The handbook identified five principles that **Board Members** should consider in governing Cybersecurity.

Directors need to understand and approach cybersecurity as an <u>enterprise</u>-wide risk management issue, not just an IT issue.

Directors should <u>understand the legal implications</u> of cyber risks as they relate to their company's specific circumstances.

Boards should have adequate access to cybersecurity expertise, and discussions about cyber-risk management should be given <u>regular and adequate time</u> on the board meeting agenda.

Directors should set the expectation that management will establish an <a href="mailto:enterprise-wide-cyber-risk management framework">enterprise-wide cyber-risk management framework</a> with adequate staffing and budget.

Board-management <u>discussion of cyber risk</u> should include identification of which risks to avoid, accept, mitigate, or transfer through insurance, as well as specific plans associated with each approach.

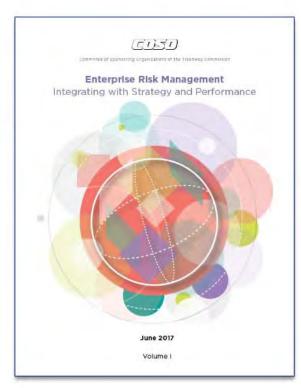
....and Don't
Forget the
Firms and
"Other Experts"

- Many of the firms have developed and distributed to the audit committee recommended questions that committee members should be asking of management.
- These questionnaires can be used to <u>effectively</u> <u>jumpstart discussions</u> between the audit committee and management on the more critical governance issues.
  - <u>Sometimes a neutral document</u> that helps balance governance vs. risk
  - May <u>refer to more detailed frameworks</u>
- Sometimes not so neutral and provides biased suggestions.

# Quick Talk about Enterprise Risk Management



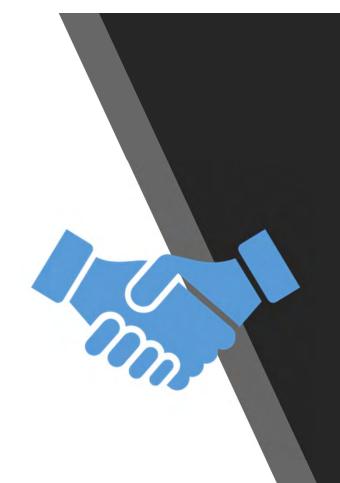
Enterprise Risk
Management Framework:
Integrating with Strategy
and Performance







- The culture, capabilities and practices, integrated with strategysetting and its performance, that organizations rely on to manage risk in creating, preserving and realizing value.
- Every entity exists to provide value to its stakeholders.
- All entities face risk in the pursuit of value.
- Risk affects an organization's ability to achieve its strategy and business objectives,
- Management determines the amount of risk the organization is prepared and willing to accept.
- Effective ERM helps boards and management to optimize outcomes with the goal of enhancing capabilities to create, preserve, and ultimately realize value.



# The Updated Framework Focuses on Integration While Emphasizing and Creating Value

- Integrating ERM with business practices results in better information that supports improved decision making and leads to enhanced performance helping organizations to:
  - Anticipating risks earlier or more explicitly, opening up more options for managing the risks
  - Identifying and pursue existing and new opportunities
  - Responding to deviations in performance more quickly and consistently
  - Developing and reporting a more comprehensive and consistent portfolio view of risk
  - Improving collaboration, trust, and information sharing
- Links value to risk appetite and the ability to manage risk to acceptable levels

# 20 key principles within each of the five components



#### Governance & Culture

- Exercises Board Risk Oversight
- Establishes Operating Structures
- 3. Defines Desired Culture
- Demonstrates Commitment to Core Values
- Attracts, Develops, and Retains Capable Individuals



#### Strategy & Objective-Setting

- Analyzes Business Context
- 7. Defines Risk Appetite
- Evaluates Alternative Strategies
- Formulates Business Objectives



#### Performance

- 10. Identifies Risk
- Assesses Severity of Risk
- 12. Prioritizes Risks
- Implements Risk Responses
- Develops Portfolio View



#### Review & Revision

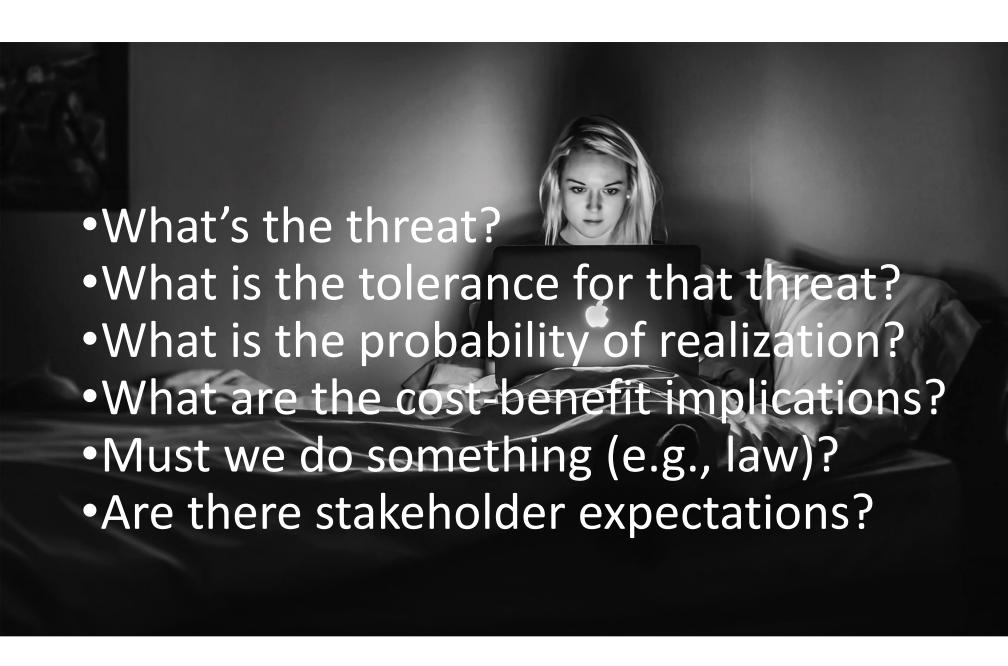
- Assesses Substantial Change
- Reviews Risk and Performance
- Pursues improvement in Enterprise Risk Management

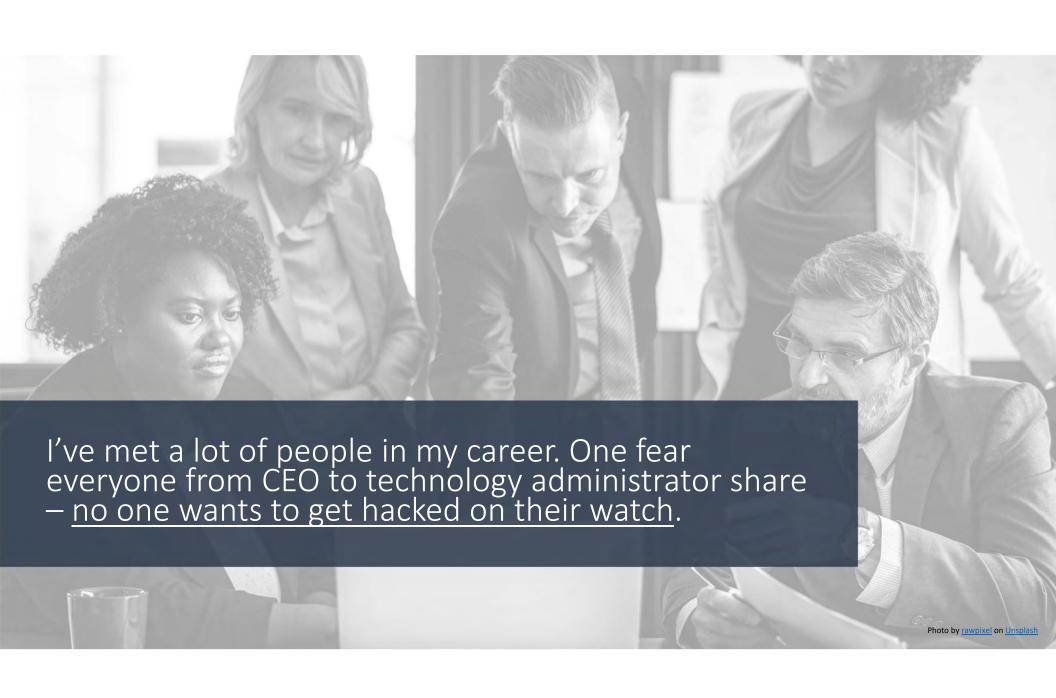


#### Information, Communication, & Reporting

- Leverages Information and Technology
- Communicates Risk Information
- Reports on Risk, Culture, and Performance









You must know the inventory of the technology assets that you are responsible for to achieve security goals

# The 30 Second Controls Audit?

Auditor: Can you provide me with a copy of a "reasonably current" inventory of all technology assets (hardware, software, third-party relationships, etc.)?

Management: Can we have a week or two to gather?

Auditor: I'm just wondering that if you don't have one available how are you:

Managing business continuity issues?

Know the priority and classification of assets to be protected?

Know where critical resources are stored?

Monitor what access vendors have to our assets?

Can we account for everything we are paying for?

How do we know which vulnerabilities need to be remediated?

How do we know what needs to be logged and monitored?



...and speaking of auditing – leverage core audit planning process to assess security



**DETERMINE OBJECTIVE** 



RESEARCH AND
POTENTIAL THREAT/RISK
IDENTIFICATION



OBTAIN AN UNDERSTANDING



DOCUMENT THE UNDERSTANDING



CONFIRM THE UNDERSTANDING (WALKTHROUGH)



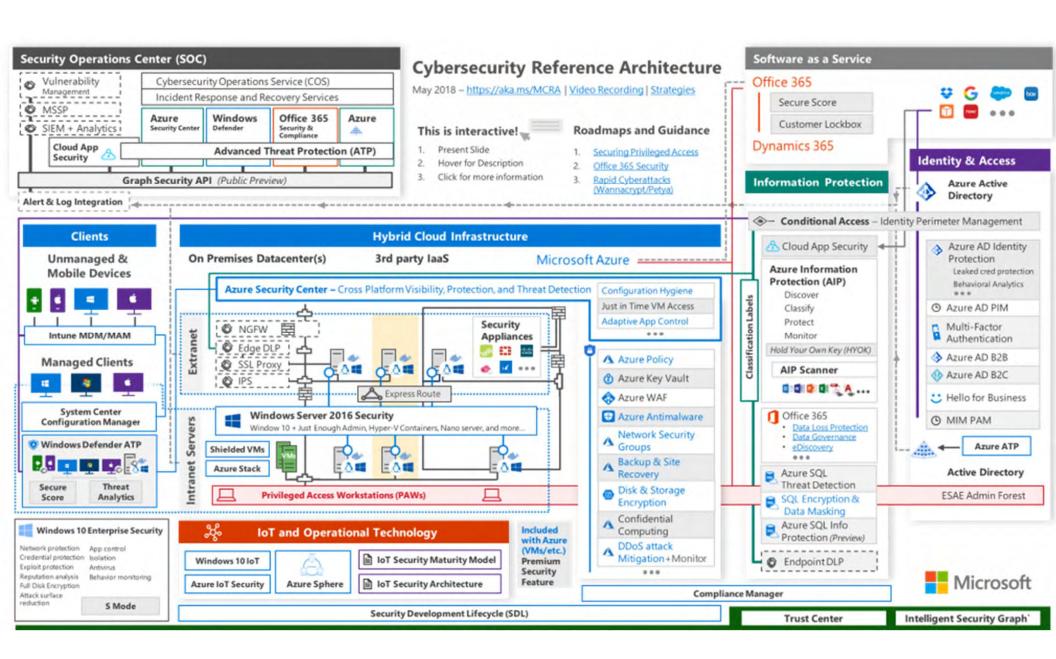
FINALIZE POTENTIAL THREAT/RISK IDENTIFICATION



IDENTIFY CONTROLS AND RISK MITIGANTS



DETERMINE RESIDUAL RISKS AND FURTHER ACTION



### AWS Shared Responsibility Model

# CUSTOMER

RESPONSIBILITY FOR SECURITY 'IN' THE CLOUD

AWS

RESPONSIBILITY FOR SECURITY OF THE CLOUD PLATFORM, APPLICATIONS, IDENTITY & ACCESS MANAGEMENT

**OPERATING SYSTEM, NETWORK & FIREWALL CONFIGURATION** 

CLIENT-SIDE DATA ENCRYPTION & DATA INTEGRITY AUTHENTICATION

SERVER-SIDE ENCRYPTION (FILE SYSTEM AND/OR DATA)

NETWORKING TRAFFIC PROTECTION (ENCRYPTION, INTEGRITY, IDENTITY)

#### SOFTWARE

COMPUTE

**STORAGE** 

DATABASE

NETWORKING

HARDWARE/AWS GLOBAL INFRASTRUCTURE

REGIONS

**AVAILABILITY ZONES** 

**EDGE LOCATIONS** 

#### TECHNOLOGY CHECKLIST



Businesses are quickly deploying all kinds of technology. Different kinds of technologies come with different risks and strategies to protect them. This checklist is designed to help you identify the technology in your business you need to protect. In addition, there are some basic security tips, considerations and links to resources that can help you learn more to detect, respond to and recover from cyber incidents.

| □ WIR          | FILE SHARING                  | USB USB             |
|----------------|-------------------------------|---------------------|
| ROUTERS        | COPIERS/PRINTERS/FAX MACHINES | ☐ WEBSITE           |
| FIREWALLS      | CLOUD SOLUTIONS               | SOCIAL NETWORKING   |
| MOBILE DEVICES | □ VPN                         | POINT OF SALE       |
| ■ EMAIL        | SWITCHES                      | ☐ 3RD PARTY VENDORS |

- · Use strong administrative and network access passwords
- . Use strong encryption (WPA2 and AES encryption)
- Use separate WiFi for guests
- · Physically secure WiFi equipment
- Get savvy about WiFi hotspots Limit accessing sensitive information on public WiFi Use VPN
- when using public WiFi

#### VIRTUAL PRIVATE NETWORK (VPN):

- · Use strong passwords, authentication and encryption
- Limit access to those with valid business need
- · Provide strong antivirus protection to users

#### NETWORK DEVICES:

#### Routers and Switches

- · Use a network monitoring app to scan for unwanted users
- · Restrict remote administrative management
- . Log out after configuring Keep firmware updated
- · Use strong passwords

#### Firewalls

· Default rules should block everything that is not specifically

necessary for the business

- Scan USBs and other external devices for viruses and malware when connected
- Only pre-approved USBs allowed in company devices
- Educate users about USB risks





#### WEBSITE:

- · Keep software up to date
- · Require users to create strong passwords to access
- . Prevent direct access to upload files to site
- . Use scan tools to test your site's security many are free
- · Register sites with similar spelling to yours
- . Run most current versions of content management systems or require web administrator/hosts to do the same

#### MOBILE DEVICES:

- Keep a clean machine: Update security software on all devices
- Delete unneeded apps
- · Secure devices with passcodes or other strong authentication such as a finger swipe and keep physically safe
- · Encrypt sensitive data on all devices
- Make sure "find device" and "remote wipe" are activated

- . When in doubt, throw it out Educate employees about remaing alert to suspicious email
- . Provide all email recipients with an option to opt off your distribution list
- · Require long, strong and unique passwords on work accounts
- . Get two steps ahead: Turn on two-factor authentication

- · Restrict the locations to which work files containing sensitive Information can be saved or copied
- · If possible, use application level encryption to protect the information in your files
- · Use file-naming conventions that are less likely to disclose the types of information a file contains
- Monitor networks for sensitive information, either directly or by using a third-party service provides
- · Free services do not provide the legal protection appropriate for business

#### POINT OF SALE (POS):

- . Make unique, strong and long passwords and change regularly
- Separate user and administrative accounts
   Keep a dean machine: Update hardware and software as needed
- · Avoid web browsing on POS terminals
- . Use antivirus protection

#### OTHER:

Secure Disposal

Beaware that many devices, not just PCs and phones, have memory. Know how to clean old data before disposing

#### Internet of Things (IoT)

- Consumer Protection and Defense Recommendations
- Isolate IoT devices on their own protected networks and change default passwords
- Know what information is being collected and how and where it's being stored and protected Consider whether lot devices are ideal for their intended purpose
- Purchase loT devices from manufacturers with a track record of
- providing secure devices
- · When available, update IoT devices with security patches (Source: www.ic3.gov)

#### SOCIAL NETWORKING:

- Create page manager policies and roles Limit administrative access
- · Require two-factor authentication
- Secure mobile devices

#### CLOUD AND OTHER 3RD PARTY VENDORS:

. Discuss the approach to security and codify in any agreements and contracts

#### COPIERS/PRINTERS/FAX MACHINES:

- · Understand that digital copiers/printers/tax
- machines are computers . Ensure devices have encryption and
- overwriting · Take advantage of all the security features
- offered
- . Secure/wipe the hard drive before disposing of an old device
- Disable the web management interface or change the default password

#### Consumer Reports -Privacy Tips for the Internet of Things

http://www.ic3.gov/med/a/2015/150910.aspx FTC - Careful Connections:

**Building Security in the Internet of Things** http://1.usa.gov/iVgftep



# "Plain Talk" on Frameworks and Why "We" Like Them

### **Recognized Frameworks**

- SOC for Cybersecurity
- SOC for Service Providers
- NIST Cybersecurity Framework
- NIST Special Publications
- CoBIT
- CERT (OCTAVE, Insider Threats)
- ISO
- Regulatory (FFIEC, HIPAA, State Laws)
- PCI
- Center for Internet Security
- OWASP (Web Applications)

### Why We Like Them

- Unbiased
- Peer Reviewed
- Relatively Low Cost
- Common Language
- Recognized as Best or Good Practices
- Baselines for Stakeholders can Assess Against (e.g., customers)
- "Standard of Reasonableness?"
- Don't have to recreate



### **ITS Policies**

HOME » POLICIES

Statewide technology policies and guidelines set standards and define best practices for the State's IT community. All statewide technology policies are available by category and can be ordered by number, date published, and date modified date. A complete listing of defined terms for NYS Information Technology Policies, Standards, and Best Practice Guidelines is available in the "NYS Information Technology Policies, Standards, and Best Practice Guidelines Glossary".

More information about the process for establishing NYS policies is available in the Process for Establishing Enterprise Information Technology Policies, Standards, and Guidelines (NYS-P09-003).

# Center for Internet Security (CIS) Critical Security Controls (cisecurity.org)



# Converting Critical Security Controls Into Business Oversight Considerations (Top 5 Only)

Too often we hear why these controls can't be implemented – especially from IT Operations.......

# CSC 1 Inventory of Devices

- How much is our IT budget?
- Do we reconcile inventory to accounting records?
- Have we assigned custodial responsibilities?

# CSC 2 Inventory of Software

- Do we have the "right mix" of licenses?
- Can we get sued?
- Do we know what is running on our systems?

# CSC 3 Vulnerabilities

#### vamerabilities

- What's acceptable and what is not?
- Are the vulnerabilities indicative of other problems?
- Are things good enough that we can pass a "real" pen test?

#### CSC 4

#### Admin Privileges

- Do we limit access on a need-to-have basis?
- Are we enforcing segregation of responsibilities?
- Do we have the audit trails to hold privileged employees accountable for their actions?

# CSC 5 Secure Configurations

- How do we determine what we configure?
- Does someone review what gets configured?
- How do we compare against outside practices (e.g., good practices)?

......Yet, these are <u>fundamental business management controls</u> —
The types of questions Audit Committees can and should be asking about.

# What's In Your Audit Committee Deliverable?

"Look Mom, no technical words!!!!!!"

# CSC1 Inventory of Devices • Need software to monitor changes. • Change control process needs to be enhanced.

#### CSC2 Inventory of Software

•Need tracking tool to monitor for software licenses.

related risks.

to vendors to existing software.

• Need to enhance controls over desktop software and

Need to reconcile payments

#### CSC4 Vulnerabilities

- Vulnerability remediation practices significantly violates established policies.
- •Only 40% of eligible assets are scanned.
- Vulnerability remediation KPI is 35% below standard.

# CSC5 Admin Privileges

 All practices comply with current expectations and policies.

# CSC3 Secure Configurations

- Configuration strategies need to be developed and standardized.
- Automated tool to monitor compliance with policy needed.
- Exception process needs to be defined.CSC3
   Secure Configurations
- Configuration strategies need to be developed and standardized.
- •Automated tool to monitor compliance with policy needed.
- •Exception process needs to be defined.

Key Issues: Does Management understand the gaps and is action being taken?

Does the information presented by Management match Internal Audit's cumulative understanding?

# Red-Yellow-Green Dashboards (Heat maps)

# **CoBIT 4.1 Maturity Level Emphasis**

(NOTE: Current Version is 5)

| COBIT DOMAINS  | SECTION               | TARGET<br>MATURITY | ASSESSED<br>MATURITY | RESIDUAL<br>RISK<br>LEVEL | PROBA-<br>BILITY | IMPACT | REMEDI-<br>ATION<br>PRIORITY |
|--|-----------------------|--------------------|----------------------|---------------------------|------------------|--------|------------------------------|
| PO1 Define a Strategic IT Plan                                 | IT Mgt.               | Managed(4)         | Managed(4)           | Low                       | Low              | Low    | n/a                          |
| PO2 Define the Information<br>Architecture                     | IT Mgt.               | Repeatable(2)      | Repeatable(2)        | Low                       | Medium           | Medium | Medium                       |
| PO3 Determine Technological<br>Direction                       | IT Mgt.               | Defined(3)         | Defined(3)           | Low                       | Medium           | Medium | Medium                       |
| PO4 Define the IT Processes,<br>Organisation and Relationships | IT Mgt.               | Defined(3)         | Defined(3)           | Low                       | Low              | Medium | Low                          |
| PO5 Manage the IT Investment                                   | IT Mgt.               | Defined(3)         | Defined(3)           | Low                       | Low              | Low    | n/a                          |
| PO6 Communicate Management<br>Aims and Direction               | Risk<br>Mgt.          | Defined(3)         | Defined(3)           | Low                       | Low              | Low    | n/a                          |
| PO7 Manage IT Human<br>Resources                               | IT Mgt.               | Defined(3)         | Defined(3)           | Low                       | Low              | Low    | n/a                          |
| PO8 Manage Quality   | IT Mgt.               | Defined(3)         | Defined(3)           | Low                       | Low              | Medium | Low                          |
| PO9 Assess and Manage IT Risks                                 | Risk<br>Mgt.          | Managed(4)         | Managed(4)           | Low                       | Medium           | Medium | Medium                       |
| PO10 Manage Projects   | IT Mgt.               | Defined(3)         | Defined(3)           | Low                       | Low              | Low    | n/a                          |
| Al1 Identify Automated<br>Solutions                            | Business<br>Solutions | Defined(3)         | Defined(3)           | Low                       | Low              | Low    | n/a                          |
| Al2 Acquire and Maintain<br>Application Software               | Business<br>Solutions | Defined(3)         | Defined(3)           | Low                       | Low              | Medium | Low                          |
| Al3 Acquire and Maintain<br>Technology Infrastructure          | Business<br>Solutions | Defined(3)         | Defined(3)           | Low                       | Low              | Low    | n/a                          |
| Al4 Enable Operation and Use                                   | Business<br>Solutions | Defined(3)         | Defined(3)           | Low                       | Low              | Low    | n/a                          |
| AI5 Procure IT Resources                                       | Business<br>Solutions | Defined(3)         | Defined(3)           | Low                       | Low              | Low    | n/a                          |

# **FFIEC (Banking) IT Audit Dashboard**

| Handbook/Focus                | Previous IT<br>Audit<br>Assessment | Current<br>Monitoring<br>Results | Pattern | Next Scheduled IT<br>AUDIT |
|-------------------------------|------------------------------------|----------------------------------|---------|----------------------------|
| Business Continuity           |                                    |                                  |         | '16-Move up 6 mos.         |
| Development & Acquisition     |                                    |                                  |         | '17- Hold                  |
| Internal Information Security |                                    |                                  |         | '17-Move up 3 mos.         |
| Cybersecurity                 |                                    |                                  |         | '16-Multiple Project       |
| Management                    |                                    |                                  |         | '16-New Guidance           |
| Operations                    |                                    |                                  |         | '18-Hold                   |
| Outsourcing                   |                                    |                                  |         | '17-Hold                   |



# Vulnerability Assessment & Pen Testing

- Too much "Scan and Dump" and not enough insightful analysis.
- What does all the information mean and what are we supposed to do with it?
- What exactly is a "Pen Test" and what do the results really mean?
- Who and how is following up on this and why are we waiting until next year to see if remediated?
- Why are we spending money on Pen Testing when we don't have a working vulnerability remediation program (and automated tool)?



Patch and Vulnerability Management-The "Diet and Exercise" of Cybersecurity

## Convert the Most Technical Issues Into Something a Business Person Can Understand & Act Upon

**Top 10 Vulnerability Exposure** 

|    | %/# Assets<br>Impacted | %/# High<br>Assets<br>Impacted | Exploit<br>Available? | Fix By Date |
|----|------------------------|--------------------------------|-----------------------|-------------|
| #1 | 100/100                | 25/25                          | Yes                   | 30 days     |
| #2 | 50/50                  | 20/20                          | Yes                   | 45 days     |
| #3 | 25/25                  | 15/15                          | Yes                   | 75 days     |
| #4 | 20/20                  | 10/10                          | No                    | TBD         |
| #5 | 10/10                  | 90/90                          | No                    | TBD         |

#### **Vulnerability Remediation Days Outstanding**

| Risk<br>Level | 0-30<br>Days | 30-60<br>Days | 60-90<br>Days | 90-120<br>Days | Over<br>120 |
|---------------|--------------|---------------|---------------|----------------|-------------|
| 5             | 15           | 12            | 8             | 2              | 1           |
| 4             | 25           | 20            | 13            | 6              | 2           |
| 3             | 45           | 38            | 24            | 12             | 5           |
| 2             | 120          | 110           | 90            | 70             | 35          |
| 1             | 500          | 450           | 375           | 300            | 275         |

"We found that ten vulnerabilities accounted for almost 97% of the exploits in 2014. The remaining 3% consists of 7,000,000 other vulnerabilities. Most attacks exploited known vulnerabilities where a patch has been available for months, often years. Of the vulnerabilities detected in 2014 we found more dating back to 2007 than from any year since." –VERIZON BREACH REPORT 2015 EXEC. SUMMARY

## Illustrative "Bum of the Month" Map (Who is responsible for the RED Boxes?)

|                  | MKT | CIO | CISO | User | Vendor | Audit |
|------------------|-----|-----|------|------|--------|-------|
| Web              | X   |     |      | X    | X      | ?     |
| Routers          |     | X   | X    |      |        | ?     |
| Firewalls        |     | X   | X    |      |        | ?     |
| Servers          |     | X   | X    |      | X      | ?     |
| Desktop          | X   | X   |      | X    | X      | ?     |
| Core Application |     | X   | X    | X    | Х      | ?     |
| Cloud            | X   |     | X    | Χ    | Χ      | ?     |
| Mobile           |     | X   | X    | X    | X      | Ş     |
| Testing          |     |     | X    |      |        | X     |



#### Data Governance

Outside of cybersecurity, perhaps no other enterprise-related IT risk management topic has captured executive management and board attention like data governance.

From an enterprise perspective, which users or departments own the company's data, what they can do with it, and how they should protect it have always been topics of discussion and, in some cases, sources of conflicts.

The recent scandal at Facebook involving data acquired by the company and sold to third parties has increased attention paid to this concern.



Why is Data Governance a Challenge?

- The problem facing most companies is that while data is an asset, most of them do not treat it as such.
  - Business digitilation
  - CRM reliance and strategies
  - Rise of data analysis and business intelligence

# Vendor Management & Cloud Computing

- Cloud computing has grown so popular and useful that technology companies to whom agencies outsource their systems (i.e., cloud service providers) now use cloud providers such as Amazon Web Services (AWS) and Microsoft Azure themselves to deliver services cost effectively and minimize the potential of loss from the most pervasive threats.
- Such vendors will often advertise and promote the reputation of AWS and Azure in selling their services; often, if the agency does due diligence or vendor management over its vendor, it relies on the vendor's representation that using AWS and Azure provides "best-in-class" security to the customer.
- Both AWS and Azure communicate that security is a joint responsibility between the organizations and the
  technology service provider, and that, as part of its vendor management oversight, the endpoint customer
  should determine and confirm that its technology service provider is addressing those responsibilities.



## End Users – How to Manage? (or Make it Happen!!!)

- In some respects, organizations have traditionally held users accountable for their use of technology, although frequently this was in name only.
- In other organizations, management expects the central IT department to provide significant support and, in many cases, "hand-hold" business owners to meet their needs and mitigate any circumvention of controls not compensated for by pervasive IT department practices and expertise.

Critical risk considerations for these tools center around traditional development and application controls.

Can the company rely on the controls used in the tool's development process, and is the analysis and resultant calculation reliable?

Are the data sources used for the analysis accurate and timely?

Do processing and analysis consider all the data processed and exclusions?

From an ERM perspective, a consistent strategy needs to be adopted. As with end-user computing, educating and communicating common expectations are critical for areas that involve the accuracy and reliability of results, such as user acceptance and stress testing.

#### Artificial Intelligence and Automation

#### The Cost of Risk Management

- The cost of seizing new business opportunities and entering new markets is an increase in a company's risk profile.
- While most agree on the necessity of managing this increased risk, there is general disagreement on the quantity of risk management needed and which risk mitigation activities provide minimal value to the enterprise, including those procedures that are duplicative.
- Most business executives, however, understand the need for these controls.
- The recent focus on extensive documentation requirements also raises significant concerns related to the cost and added value of risk management provided.



#### Conclusion – Meeting The Challenge



The ability to manage technology risk is a critical component of any organization's ERM effort.



COSO's new *Enterprise Risk Management—Integrated Framework* provides companies with the flexibility and tools needed to align technology risk with strategic goals and business objectives.



Cybersecurity threats and computer errors will always be factors that hinder an organization's success, reputation, and value.



The new ERM framework provides a process for companies to make appropriate investments for the given risk appetite and tolerances, helping to ensure that risk-adjusted returns provide necessary funding for the long-term well-being of the enterprise.

### FOR FURTHER INFORMATION

Thank you for attending today's conference.

Should you have any followup questions please do not hesitate to call or email me.

Don't forget to visit my website for articles, columns and my blog.

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