

Cybersecurity

► Update

VanderWal Agency LLC

“Peace of Mind Comes With A Plan”

Objectives

- ▶ This course is designed to provide insurance professionals an overview and general understanding of cyber security protocol and assessment guidelines involving loss of customer data.



Objectives

- ▶ A discussion of the regulatory environment, risk assessment protocol and notification rules offers agencies a framework for managing data and assessing compliance issues.
- ▶ Quick tips for administrative, technical and physical data protection as defined under Gramm Leach Bliley are reviewed.



Predators and Criminals

Why cyber security?

Administrative, Physical and Technical

Critical information

"Our identity is increasingly going to become the asset that we have to be most careful to protect in the 21st century where the ability to get information, move it around the world and store it indefinitely creates greater and greater risks to personal reputation and personal privacy"...

*--Homeland Security Secretary Michael Chertoff
August 2008*



Everyday we share...





October- National Cyber ▶ Security Month

Own IT, Secure IT, Protect IT

Own it



Never Click and Tell

Staying safe
on social
media



Update Privacy Settings



Keep Tabs on Your Apps

Best
practices
for device
applications

Secure it



Shake Up Your Passphrase Protocol

Create strong,
unique passphrases



Double Your Login Protection

Turn on multi-factor
authentication

Secure it



Shop Safe Online



Play Hard To
Get With
Strangers

How to
spot
and
avoid
phish

Don't bite on Phish

Laurie VanderWal

From: Joseph Morgan <joseph@rogers.com>
Sent: Thursday, July 6, 2017 11:39 AM
To: laurie@vanderwalagency.com
Subject: RE:RE: shipping information

Hello,

The delay happened because of the Independence Day.
Here is the label from UPS, use the tracking number on their website :

https://www.ups.com/WebTracking/track?loc=en_us&action=view&id=72808264&acc=laurie

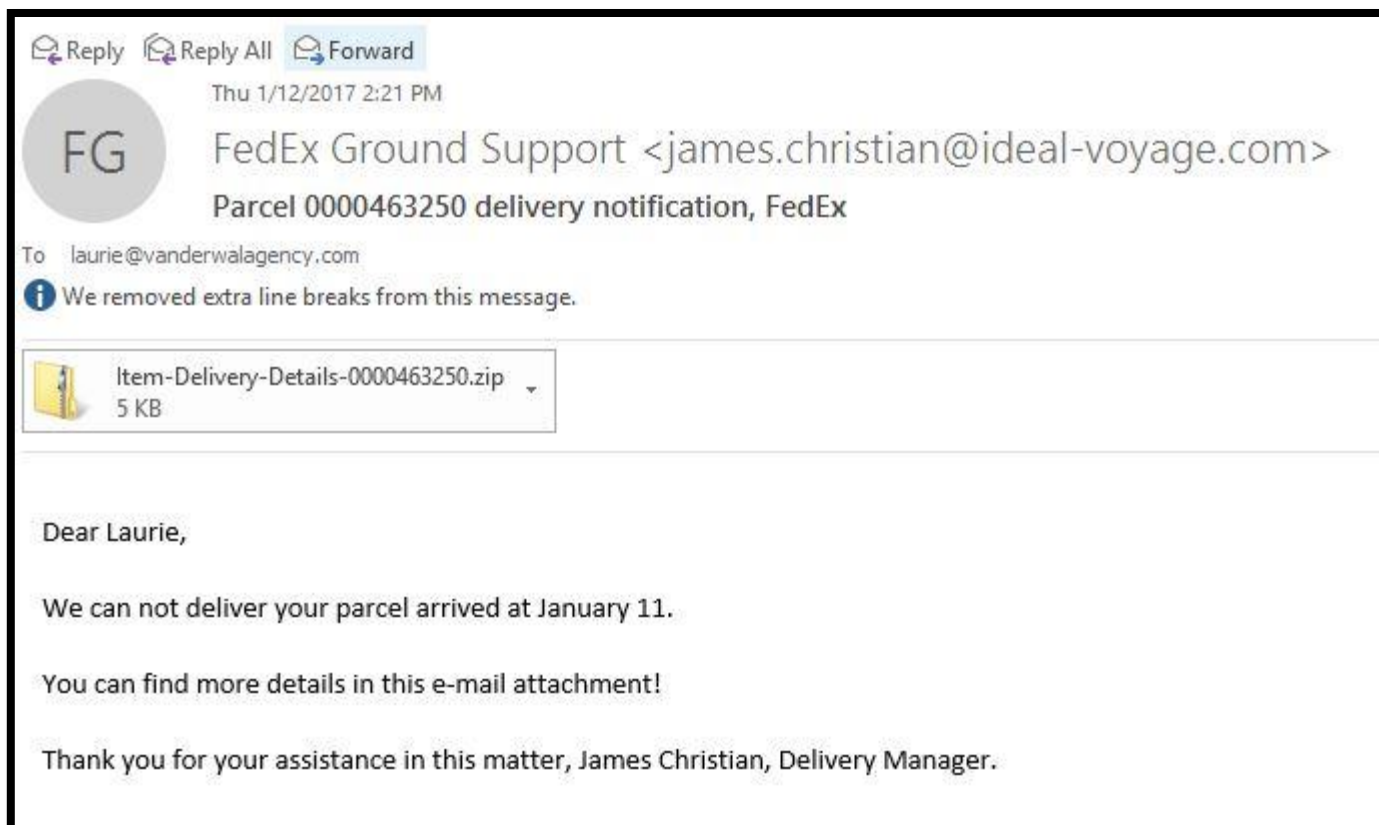
Thank you again for your patience!

Joseph Morgan
Orders Manager
email:joseph@rogers.com
tel.:726-215-7001

On Mon, Jul 3, 2017 at 3:21 PM, <laurie@vanderwalagency.com> wrote:

- > Have you shipped my order?
- > Give me a call as soon as possible.

Don't bite on Phish



Protect it



If You Connect, You Must
Protect



Stay Protected
While Connected

Wi-Fi
safety

Protect it



Keep updated security software



Use current web browser and operating systems

Protect it

Business must
keep
customers,
consumers,
and staff
information
safe



If You Collect--It Protect It



Accidental release



Intentional data breach



Unauthorized access of
information



Contractual relationships



▶ Regulatory

Federal & State

Health & Human Services

NAIC

Federal Trade Commission Workshop Voice Cloning Technology

- ▶ Speech synthesis
 - ▶ Using the voice of an actual person
- ▶ Development and use of voice cloning technologies
 - ▶ Healthcare
 - ▶ Consumer-oriented applications
 - ▶ Virtual assistants
 - ▶ Customer service
 - ▶ Entertainment
 - ▶ Carry out fraudulent schemes



Federal Trade Commission Workshop Voice Cloning Technology

- ▶ Ethical & legal concerns related to the use of cloned voices
 - ▶ Call to change a beneficiary
 - ▶ Increase life insurance amount
 - ▶ Remove cash from a financial services account
 - ▶ People may become predators!!



Regulating Protection of NPI

Financial Data Protection & Consumer Notification of Data Security Breach Act of 2006



NEBRASKA

Regulating Protection of NPI

Nebraska amended 2018
Added language for
Securing a Written Information
Security Program (WISP)
Including proper disposal of data

NEBRASKA

Regulating Protection of NPI

Nebraska amended 2018

If you share NPI with third party vendor, it shall require by contract that the service provider implement and maintain reasonable security procedures and practices of that data.

NEBRASKA

Regulating Protection of NPI

Personal Information Security Breach
Protection Act 2008

500 records or more within 5 business days



Regulating Protection of NPI

If you are required by other state or federal law with higher compliance standards, then you are likely compliant with Nebraska & Iowa state laws.



Regulating Protection of NPI--HHS



- ▶ Notification rules-HHS
- ▶ 500 records or more immediately
- ▶ 500 records or less annually

HHS Data Breach
Notification Rule

HITECH

Designed to encourage healthcare providers to adopt electronic health records

Driven to improve privacy and security protections for healthcare data.
Financial incentives for adopting EHRs were offered

Increased penalties for violations of the HIPAA Privacy and Security Rules.

NAIC Cyber Security Model

► Law

National Association of Insurance Commissioners

NAIC Model Law



Defines the framework for security



Outlines the objectives



Provides *Risk Assessment* protocol



Implementation guidelines

NAIC Model Law



Incident response
plan



Investigation and
notification of a
cyber security event



Oversight

- ✓ Board of Directors
- ✓ Third-Party Service
Provider Arrangements

NAIC Model Law

- ▶ Long term goal of model law
 - ▶ Create a model framework for data protection
 - ▶ Offer guidelines for professionals to complete a *Written Information Security Program (WISP)*



States with NAIC Model Law

- Ohio
- Michigan
- Alabama
- Delaware
- Connecticut
- New York
- New Hampshire
- Minnesota
- Mississippi

*Common denominator-Require a
Written Information Security Program (WISP)*

Risk management

- ▶ Errors & omissions coverage
- ▶ Cyber insurance
- ▶ Insurance carrier appointments
- ▶ Federal and state regulators

*Common Denominator—Require a
Written Information Security Program (WISP)*

Risk Assessment

► Protocol

Where do we start?

Policy & Procedure

- ▶ Information access use policy
 - ▶ Do not use business computer for personal reasons
 - ▶ No online shopping on office computers
 - ▶ No personal downloads, ie music or entertainment



Policy & Procedure

- ▶ Mobile device wifi usage
 - ▶ Do you know if your mobile device automatically connected to an open wifi at our meeting today?
 - ▶ Is it important to know?
 - ▶ Why?



Policy & Procedure

► Mobile device

- Do you know how to locate your phone if it were lost?
- Do you need to notify anyone within your business sphere that the device is lost, MIA and/or may be open to compromise?



Staff training

- ▶ Play a game, compliance can be fun!
- ▶ Locate your phone game
 - ▶ Put all phones in one room
 - ▶ Go back to your desk
 - ▶ First phone to ring wins!
 - ▶ Choose a prize as you go down the line
 - ▶ Last one in gets to write the policy and procedure on lost phone consequence!!



Policy & Procedure-Password Management

- ▶ What is your password management system?
 - ▶ Manual
 - ▶ Software driven
 - ▶ Password vendors
 - ▶ Identity theft product security
- ▶ Does it look different?
 - ▶ Personal
 - ▶ Business



Policy & Procedure-Password Management

- ▶ Do you have a password to get into your mobile device?
 - ▶ DNA
 - ▶ Facial
 - ▶ Fingerprint
 - ▶ Designed pattern
 - ▶ Set of unique numbers



Policy & Procedure

- ▶ Are you using multi-factor authentication?
- ▶ Do you have a system for creating, changing, and deleting passwords?
- ▶ If you choose a manually driven method
 - ▶ Make it a game



Staff training



- ▶ Play a scrabble password game
 - ▶ Create passwords from game words
 - ▶ Be creative, have fun
- ▶ Create a new alphabet
 - ▶ Replace letters for numbers
 - ▶ Make every letter “A” the number 3

Policy & Procedure

- ▶ Vendor risk management
 - ▶ Set protocol for access
 - ▶ Review contractual relationships
 - ▶ Obtain cyber security insurance certificate
 - ▶ WISP



Policy & Procedure



- ▶ Review social media protocol and presence
 - ▶ Should business information be allowed on personal social media accounts? I.e., an employer's name
 - ▶ Are staff posting content that violates the company ethics code?
 - ▶ Have you ever discussed an ethical code for online posting with staff?

Policy & Procedure



- ▶ Review social media staff presence
 - ▶ Are defamatory statements being made? About anyone?
 - ▶ Are the ethics of the company being upheld by the individuals?
 - ▶ What common sense rules should we follow?
 - ▶ What posting is appropriate?

Staff training

- ▶ Define the culture of your organization for security
- ▶ Discuss guidelines for an online ethical code of conduct
 - ▶ Personal
 - ▶ Business





Social media and

► Underwriting

What does the future hold for consumers as we look to underwrite social media content?

Future Underwriting



- ▶ Is it OK for a high-profile city employee to put out a video post showing themselves “burning” up the block
- ▶ From 0 to 60 in 4.3 seconds
- ▶ Should that type of activity reflect in their auto insurance rate?

Future Underwriting



- ▶ Is it OK for an individual applying for life insurance to flaunt a risky online lifestyle?
 - ▶ What is risky?
 - ▶ What do underwriting guidelines state?
- ▶ Could that same behavior by the city employee increase the chance for an untimely death?

Social media profile

- ▶ Household & individual profile
- ▶ Category of content posting

- ✓ Influencer
- ✓ Volunteer activity
- ✓ Gets along with others
- ✓ Supports community
- ✓ Financially sound
- ✓ Responsible
- ✓ Very socially active
- ✓ Alcohol related events
- ✓ Unpopular comments
- ✓ # of post dislikes
- ✓ Size of friend base
- ✓ Risky behavior
- ✓ Antagonist behavior
- ✓ Business posting



Future Policy & Procedure

- ▶ Online presence matters
- ▶ Social media posting
- ▶ Social media pictures
- ▶ Business networking platforms
- ▶ Local neighborhood online groups



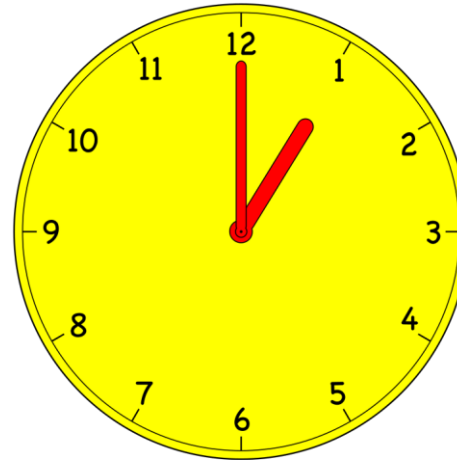


► Breach Protocol

What to do before, during and after the breach

After the breach

- ▶ The first hour
- ▶ The first 24 hours
- ▶ Week one after a breach
- ▶ One month after a breach



Tick, tock...Tick, tock...

Incident Response

- ▶ Internal notification
 - ▶ Policy on what to communicate
 - ▶ Proactive stance
- ▶ Customer notification
- ▶ Insurance carrier notification



Threat analysis-Technical

- ▶ Forensic analysis
 - ▶ IT department
 - ▶ Cyber insurance resource
 - ▶ Recommendations
 - ▶ National
 - ▶ Local resources



Threat analysis-Technical

- ▶ Technology safeguards protocol review
- ▶ Known Malware
- ▶ Antivirus compromised
- ▶ Current security protocol
 - ▶ Is it 8 am or 5 pm?
 - ▶ Is it payday or an average day?
- ▶ Backup protocol



Threat analysis-Physical

- ▶ Physical security checklist
- ▶ Building vulnerabilities
- ▶ Windows compromised
- ▶ Missing property



Incident Response

- ▶ Identify breach type
 - ▶ Physical
 - ▶ Network security
 - ▶ Internal/employee
 - ▶ Cloud based
 - ▶ Intentional
 - ▶ Unintentional
 - ▶ Hard copy paper

DATA
BREACH
ALERT

Incident response



- ▶ Notify law enforcement
- ▶ Work cohesively with technical and leadership teams to limit damage
- ▶ Notify customers
- ▶ Notify any regulatory bodies
- ▶ Begin the recovery effort
- ▶ Hold a “lessons learned” meeting



Cyber Insurance review

- ▶ Cyber policy coverages and guidelines
 - ▶ Victim credit monitoring
 - ▶ Notification reimbursement
 - ▶ Forensic analysis
 - ▶ First or third party liability





Gramm Leach Bliley & The ▶ Circle of Data

Collection, Storage, Access, Protection,
Destruction

Defining NPI

- ▶ Compliance policy on protecting data
 - ▶ Customer
 - ▶ Employee
 - ▶ Corporate business information



Collection of NPI



► Identify the elements for protection

- Social security number



- Financial data

 - Credit/debit card

 - Checking account

- Birthdate



- Driver's license

- Application information



Collection of NPI



► Identify the elements for protection

- Medical information
- DNA
- Fingerprint
 - Handprint
- Facial recognition
 - Iris scan
- Voice recognition
 - Virtual assistants



Collection of NPI



- ▶ Identify the elements for protection
 - ▶ Employee records
 - ▶ Proprietary corporate details
 - ▶ Customer database
 - ▶ Intellectual property
 - ▶ Financial statements
 - ▶ Architectural plans



Collection of NPI



Identify all opportunities for incoming data

- ▶ Electronic
 - ▶ Mobile device
 - ▶ Website
 - ▶ Social Media
 - ▶ Email
- ▶ Paper
- ▶ Physical business office



Storage of NPI

- ▶ Electronic security
 - ▶ Desktop protocol
 - ▶ Mobile device protocol
- ▶ Paper records



Accessing NPI

- ▶ A google search can be revealing
- ▶ COMMERCIAL GENERAL LIABILITY
 - ▶ CG 00 01 04 13

[PDF] COMMERCIAL LINES POLICY COMMON POLICY DECLARATIONS ...
www.jonathanslandingnh.org/wp-content/uploads/2012/.../2013-JL-Master-Policy.pdf ▼
Issuing Company: **Continental Western Insurance** Company, 4 Bedford Farms ... SCHEDULE OF FORMS
AND ENDORSEMENTS;CL IL FS 01;09/08 **ISO Properties, Inc.**, 2007 ... **COMMERCIAL GENERAL
LIABILITY** COVERAGE PART.

Accessing NPI

- ▶ Google searching creates vulnerabilities
- ▶ COMMERCIAL GENERAL LIABILITY
 - ▶ CG 00 01 04 13

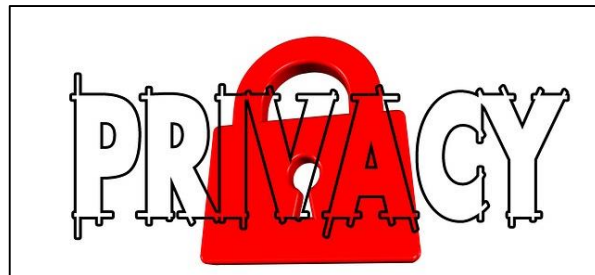
[PDF] QU AL IT Y 01 00 QUALITY FORM FOR USIG_QU ... - Whispering Bluff

www.whisperingbluff.com/2017%20Insure.pdf

Oct 5, 2016 - Acadia Insurance Company – Continental Western Insurance Company – Firemens Insurance Company of Washington, D.C. – ... COMMERCIAL GENERAL LIABILITY COVERAGE FORM ISO Properties, Inc., 2007.

Accessing NPI

- ▶ Identify unauthorized use of information
 - ▶ Staff permission levels
 - ▶ Property/casualty agents
 - ▶ Life/health agents
 - ▶ Medical information protocol
 - ▶ Financial services records



Accessing NPI



► Compliance and internal systems

► Internal messaging platforms

► Virtual assistant

► Personal functions on business computer

► Personal email access

► Social media access



Email



IT & Accessing NPI



- ▶ IT and cloud accessibility
 - ▶ Who controls storage and access?
 - ▶ How is data accessed and storage managed?
 - ▶ How long is information accessible?
 - ▶ When is data overwritten with new information?

Outside Access to NPI

- ▶ Outside office accessibility
 - ▶ Mobile device/Tablets
 - ▶ Laptops
 - ▶ Personal home computer and personal mobile devices
- ▶ Unsecure wifi network vulnerability



Protecting data



- ▶ Secure your wifi
- ▶ Don't share passwords
- ▶ Review protocol on a regular basis
 - ▶ Security is an ongoing moving target

Destruction of data--NPI

- ▶ Electronic and paper destruction policy
- ▶ Retention policy
 - ▶ Insurance carrier
 - ▶ State department of insurance
 - ▶ Internal company policy



Personal information

IT'S LIKE MONEY
RESPECT IT
PROTECT IT!

Your words are permanent

TMI



Thank you for attending

VanderWal Agency LLC

Laurie VanderWal

“Peace of Mind Comes With A Plan”

402-216-8262