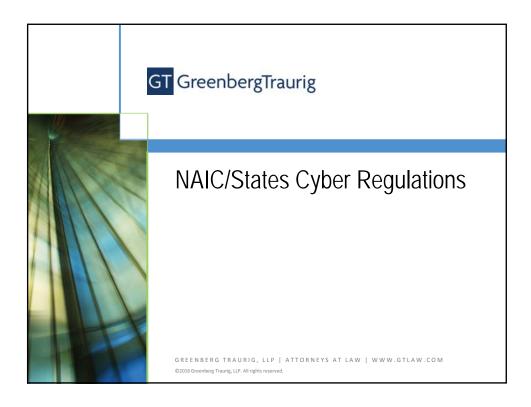
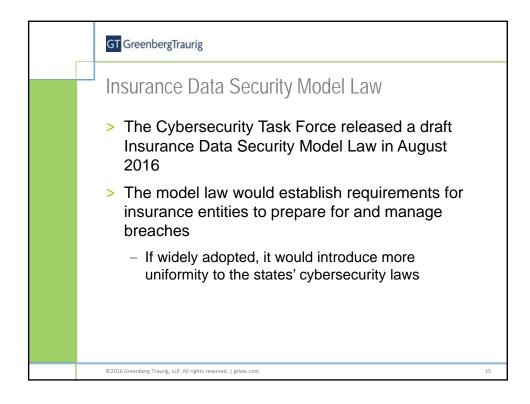


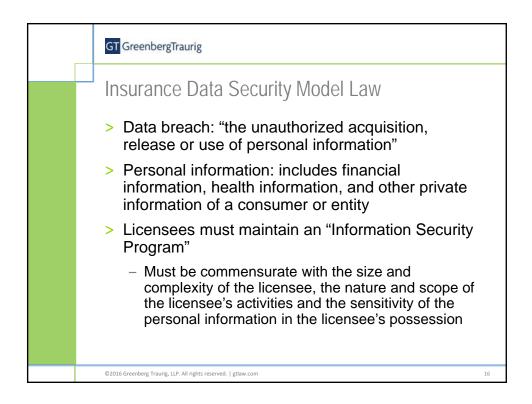
GT GreenbergTraurig
SEC Safeguards Rule
 Safeguards Rule requires registered brokers- dealers and investment advisers to adopt written policies and procedures to:
 Insure the security and confidentiality of customer records and information;
 Protect against any anticipated threats or hazards to the security or integrity of customer records and information; and
 Protect against unauthorized access to or use of customer records or information that could result in substantial harm or inconvenience to any customer
©2016 Greenberg Traurig, LLP. All rights reserved. gtlaw.com 11

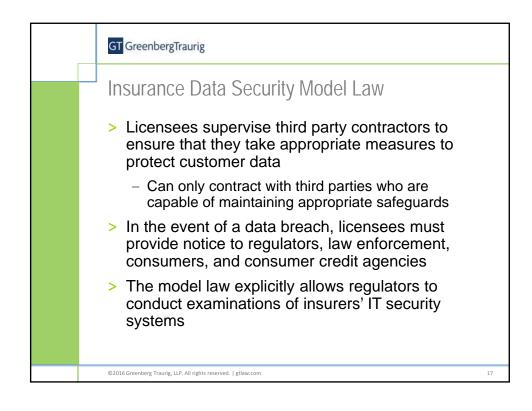
GT GreenbergTraurig	
SEC Safeguards Rule	
> June 8, 2016 SEC order:	
 An employee of a broker-dealer/investment advisory firm misappropriated data from approximately 730,000 customer accounts 	
The data subsequently surfaced online	
 Someone likely hacked the employee's personal server and stole the data from him 	
 SEC found that the firm had violated the Safeguards Rule because its policies and procedures were not reasonably designed to meet the objectives of the Rule 	
©2016 Greenberg Traurig, LLP. All rights reserved. gtlaw.com	12

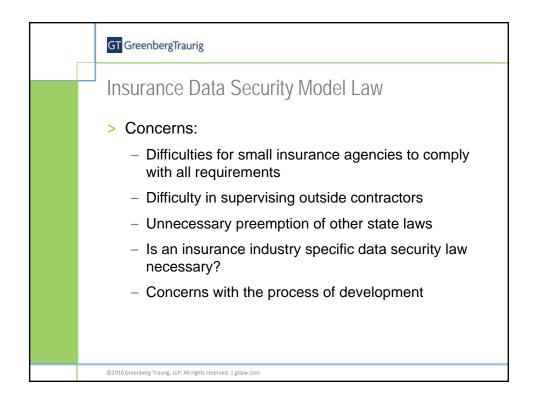


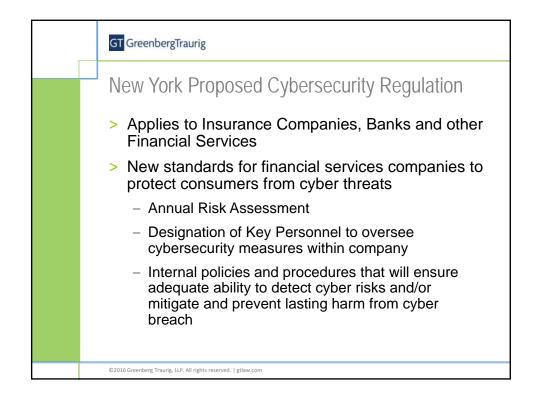
GT GreenbergTraurig
NAIC Cybersecurity Task Force
> Task Force's Larger Plan
 Model Laws
 Health Information Privacy Model Act (Model 55)
 Privacy of Consumer Financial and Health Information Regulation (Model 672)
 Standards for Safeguarding Customer Information Model Regulation (Model 673)
Insurance Fraud Prevention Model Act (Model 680)
Insurance Data Security Model Law
 NAIC Roadmap for Cybersecurity Consumer Protections (formerly the Cybersecurity Bill of Rights)
©2016 Greenberg Traurig, LLP. All rights reserved. gtlaw.com 14

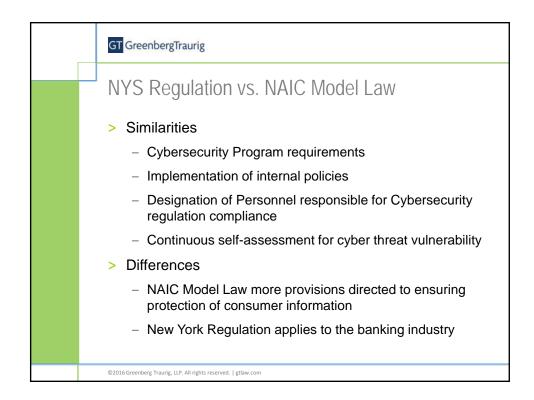


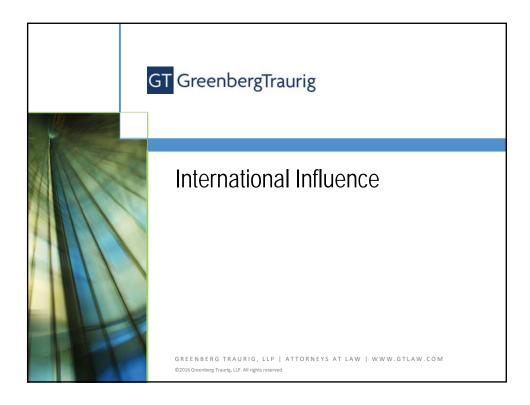


















GT

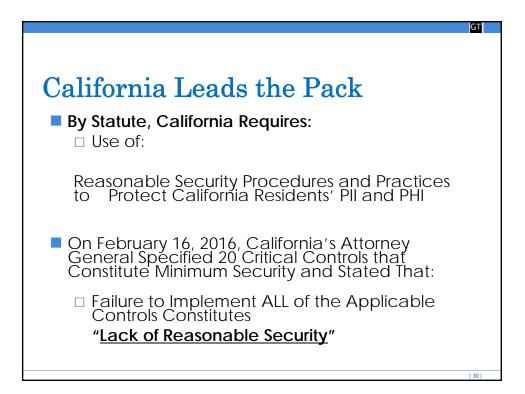
Cyber Climate Change



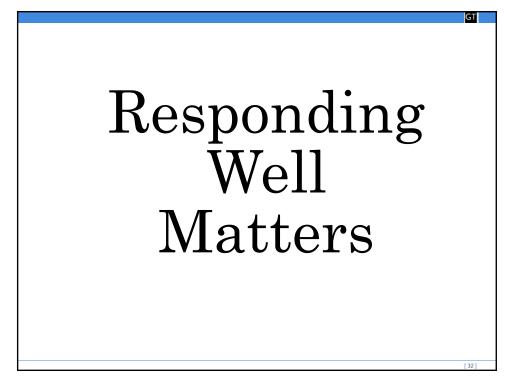


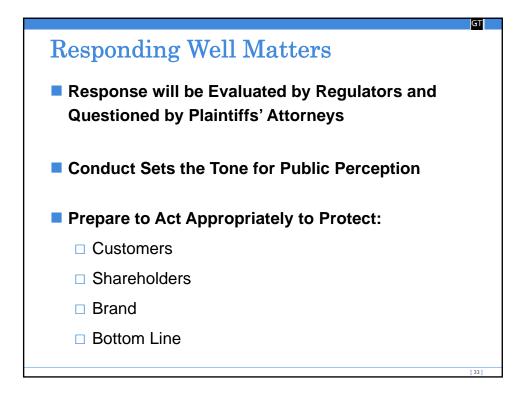


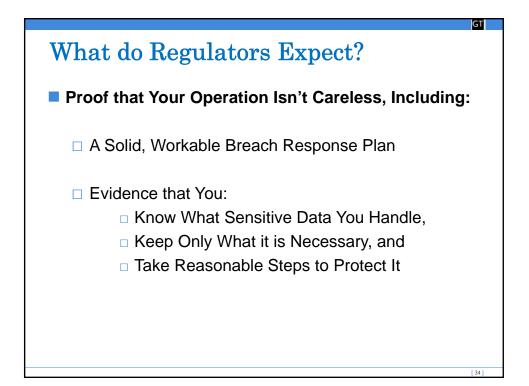




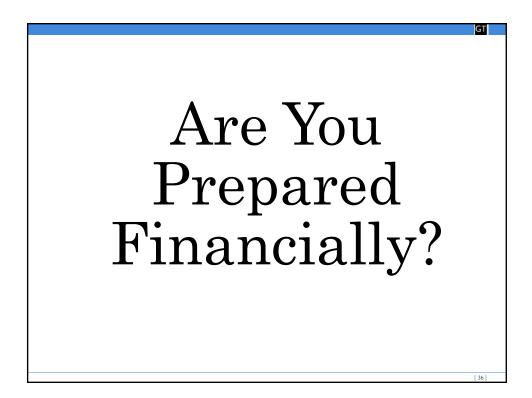
	nt of Justice 2016 Data Breach Report
uary, 16, 2016	
-	
The CIS Critic	al Security Controls for Effective Cyber Defense
CSC 1	Inventory of Authorized and Unauthorized Devices
CSC 2	Inventory of Authorized and Unauthorized Software
CSC 3	Secure configurations for Hardware and Software on Mobile Devices, Laptops, Workstations and Servers
CSC 4	Continuous Vulnerability Assessment and Remediation
CSC 5	Controlled Use of Administrative Privileges
CSC 6	Maintenance, Monitoring, and Analysis of Audit Logs
CSC 7	Email and Web Browser Protection
CSC 8	Malware Defenses
CSC 9	Limitation and Control of Network Ports, Protocols, and Services
CSC 10	Data Recovery Capability
CSC 11	Secure Configurations for Network Devices such as Firewalls, Routers, and Switches
CSC 12	Boundary Defense
CSC 13	Data Protection
CSC 14	Controlled Access Based on the Need to Know
CSC 15	Wireless Access Control
CSC 16	Account monitoring and Control
CSC 17	Security Skills Assessment and Appropriate Training to Fill Gaps
CSC 18	Application Software Security
CSC 19	Incident Response and Management
CSC 20	Penetration Tests and Red Team Exercises

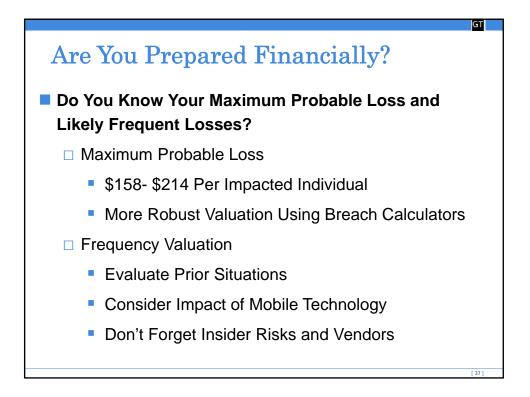








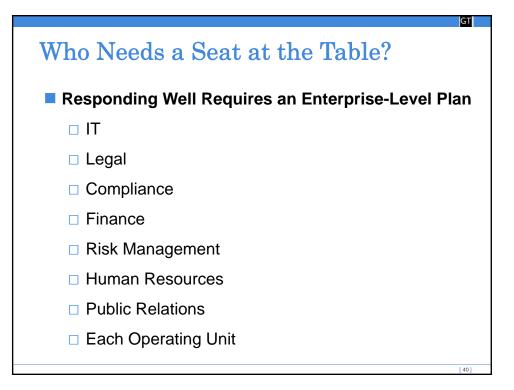


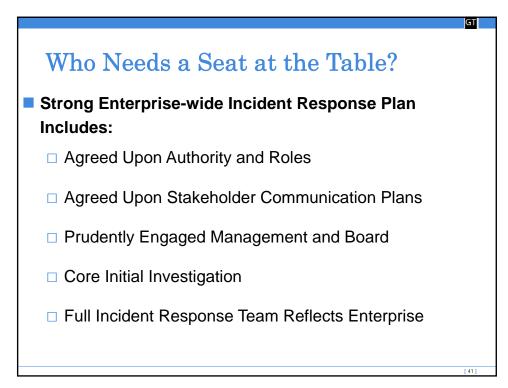


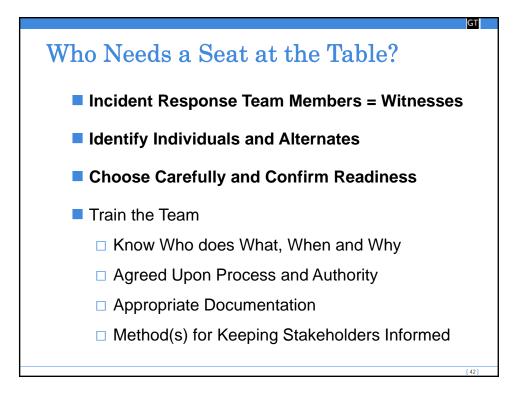


GΤ

Who Needs a Seat at the Table?







GT

GT

What are Your Proof Points?

What are Your Proof Points?

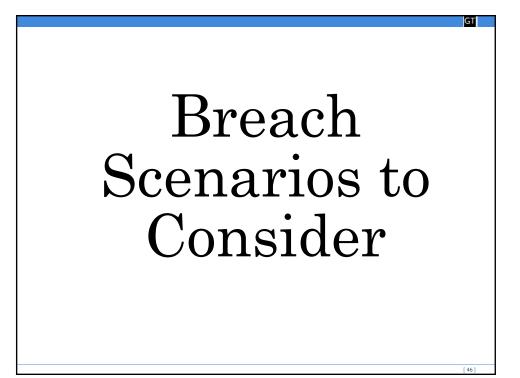
- What Evidence Proves Your Reasonableness to Customers, Regulators, Plaintiffs' Attorneys, Shareholders and the Public?
 - □ Is Your Cybersecurity Governance Defensible?
 - □ Are You PCI Compliant?
 - Has Your Incident Response Plan been Tested This Year—and Not Just the IT Portion?
 - □ Do You Benchmark Favorably?

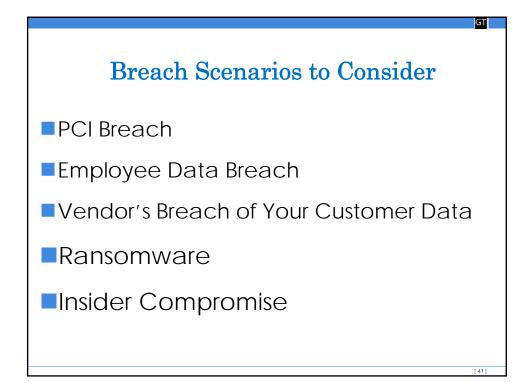
GT



Defensible Positions

- Maximize Legal Protection of Response
- Document Prudently
- □ Strong Proof Points are Identified in Advance:
 - Active Management and Board Engagement
 - Reasonable Steps Taken to Minimize and Protect Reportable Information Cradle to Grave
 - Appropriate Training and Testing
 - Independent Expert Validation of Good Practices
 - Key Documents and Witnesses are Ready







GΤ



Presented by: Lori S. Nugent

Greenberg Traurig, LLP

nugentl@gtlaw.com

214-665-3630

