

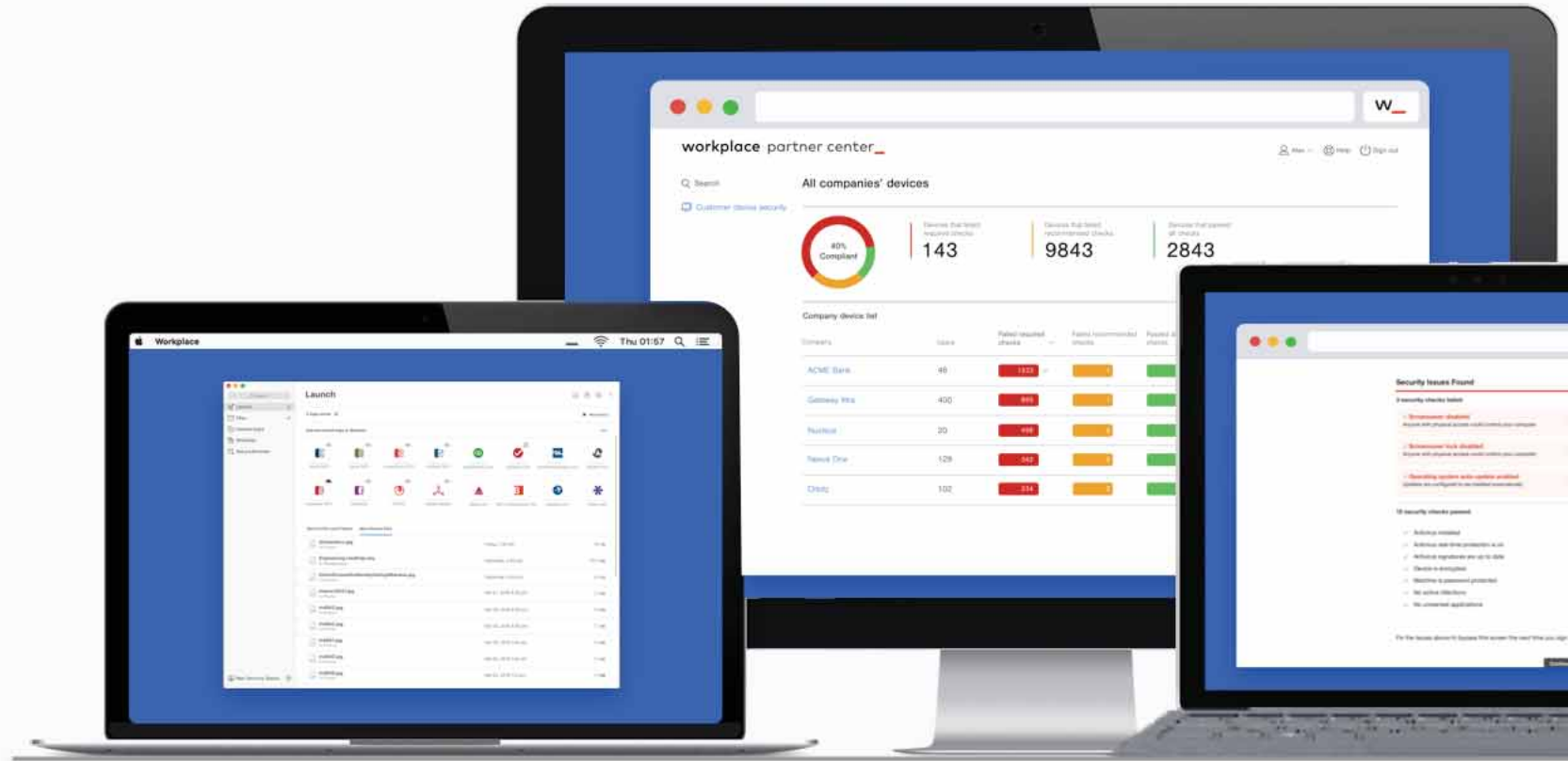


FINANCIAL  
SERVICES  
INSTITUTE

VOICE OF INDEPENDENT  
FINANCIAL SERVICES  
FIRMS AND INDEPENDENT  
FINANCIAL ADVISORS

# FINRA 2018 Cybersecurity Best Practice

July 24, 2019



Presented By



[fa-mag.com](http://fa-mag.com)

Speaker



**Sam Attias**

VP, Partnership Development

Workplace by OS33 is the leading SaaS platform enabling turnkey Compliance & Cybersecurity for Broker-Dealers, RIAs, and Insurance Companies that leverage independent representatives and advisors.



# WHAT KEEPS YOU UP AT NIGHT



Ground-breaking shift in BD responsibility of advisors' technology usage.



Failure to safeguard confidential customer data from foreign hackers.



Fined **\$1M** for cybersecurity failures leading to the compromise of customer data.



+ 11 other firms

12 BD firms fined a total of **\$14.4M** for failure to store customer data in WORM compliant format.

# FINRA 2019 Cybersecurity Report

5 sections to this report:

1. Branch Controls
2. Phishing
3. Insider Threats
4. Penetration Testing
5. Mobile Devices



## STRENGTHEN YOUR BRANCH OFFICES

Most broker-dealers have developed Written Supervisory Procedures (WSPs) to define firm level cybersecurity controls, but how can branch offices and advisors be prepared too?

- Create a comprehensive set of minimum standards for the branch level
- Implement a review program - includes inspections and remote surveillance
- Asset Inventory:
  - List of required /recommended hardware & software vendors
- Technical Controls – passwords, encryption, wireless, AV/AM, MFA, IAM



## UNMASK THE ATTACKS

**Phishing attacks** are one of the most common cybersecurity threats known to firms and attackers' disguises are becoming increasingly difficult to distinguish from legitimate communications. How do you keep employees informed?

- Develop policies and procedures to identify, delete, and notify designated staff of phishing incidents, ensure remediation after an attack
- Establish consequences and conduct remedial training for employees
- Log all phishing incidents and firm responses, and report incidents
- Data access conditional upon phish testing remediation?





# PROTECT YOUR FIRM FROM INSIDE OUT

Insiders are those who have or have had access to the firm's systems and data. This includes employees, consultants, **third-party vendors**, and more. Do you know what to look out for and how to stop it?

- Designate a senior executive or manager to be responsible for the firm's insider threat controls
- Policies to automatically revoke network and system access
- Identity Access Mgmt. and comprehensive password policies (MFA)
- SIEM, UEBA & DLP Tools – Proactive!



## SOLIDIFY YOUR WALLS

Penetration testing identifies holes in a firm's internal and external security systems, enabling them to remedy vulnerabilities. Does your firm's systems have holes that need to be filled?

- Conduct thorough due diligence of reputable third-party testers
- Look for a vendor with the appropriate certifications, including Certified Ethical Hacker (CEH), (OSCP) or GIAC Penetration Tester (GPEN)
- Establish parameters that specify appropriate timing of testing and the applications, systems, networks, IP addresses etc. that should be tested
- Automated tools available



## **GAIN GREATER CONTROL OVER MOBILE DEVICE USE**

As the use of smartphones, tablets & laptops have grown, so have their cybersecurity risks. Set parameters to maintain greater control & combat risks.

- Establish policies for staff and advisors to protect sensitive firm data
- Standards for the use of personal devices for firm business (its all business!)
- Conduct training for all staff and advisors
- Ensure devices aren't Jailbroken
- Enable remote wipe capabilities for firm data
- Manage access by location



## OTHER REGULATORS



Thank you.

Sam Attias

VP, Partnership Development

sattias@os33.com