

DID YOU KNOW?

Less than 10% of respondent firms have their IT environment formally tested and evaluated for design and operational effectiveness

Only 50% of firms have a formal incident response plan for cyber-related breaches

CIPPERMAN'S VIEW

When Cybersecurity became a hot topic a few years ago, investment firms generally handled the threat in one of three ways:

1. Downloaded their policies from the internet and adopted them as their own without much customization or regard for the technology side of things.
2. Deferred responsibility to a third-party IT provider.
3. Ignored cybersecurity altogether.

With cybersecurity now so critical to the health and future of firms (and to regulators), Cipperman recommends:

- A periodic review to ensure the policies are adequately designed. Aligning the wording of the policies with the capabilities of the applications and systems is a very important first step in developing accurate cybersecurity policies and procedures.
- After implementation, undertake periodic assessments to ensure any applications, and the cyber policies and procedures are operating effectively. Engaging a qualified third-party to complete the testing and maintaining formal documentation of these results is an integral part of the test itself. Demonstrating the results of the test and a plan of action is an important step in the eyes of any regulator.

Aside from controls and policies put in place to prevent a cyber event, regulators also want your firm to plan for a cyber breach or data hack and develop a formal incident response plan. This plan should include:

- contact information of the response team
- system and network details
- escalation decision-makers
- notification plans for key third-parties
- operational instructions
- data recovery & isolation plans
- maintenance of evidence
- any other plans to keep the business running while dealing with the cyber event

Learn more with Cipperman...

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