

# Workshop on Cyber-Security and **Cyber-Risk Insurance** Fundamentals



Presentation by Syed Abdul Qadir 16th July 2019





### **Speaker's Introduction**

### **SYED ABDUL QADIR** – Director (Technology Consulting & Risk Assurance)

A. F. Ferguson & Co. | a member firm of PwC network

BE, MBA, PMP, CISA, ISO 27001 (Lead Auditor), MCITP, HPCP

- ✓ 17+ years IT management and cyber security consultancy experience with multinational and local private and public sector companies.
- ✓ Previously with Pakistan Refinery Limited as Head of Information Technology

#### **Core Area of Expertise :**

- Digital Transformation and Emerging Technologies
- Enterprise Cyber Security Risk Management
- Data Governance, Analytics and GDPR
- IT Audits and risk management
- Technology strategy and governance
- Information Systems Operations & Maintenance
- Business Continuity and Disaster Recovery Plan
- Project Management and Quality assurance
- Cyber security policy procedures and compliance reviews, ISAE 3402
- IT Operations Management (Business Application, Operating System, Database Management System, Network Infrastructure & Services)
- ERP Solution Design Consulting
- Post Implementation Reviews of Business Applications

Note: Abdul Qadir has led 25+ consultancy and advisory engagements for Banks and FI(s) related to State Bank of Pakistan's "Enterprise Technology Governance and Cyber Risk Management Frameworks". Based on his experience he has also conducted multiple workshops and trainings attended by Senior Professionals from IT, Information Security, Internal Audit, Compliance and Risk Management.





## Disclaimer

"The views expressed in this presentation are my. own and do not necessarily represent those of any regulator or our employer"



## Agenda



- Evolving Technology Landscape, Adversaries and Impacts
- **Global Cyber Security Attacks / Breaches**
- Most Common Cyber Security Concepts
- Synopsis of the SECP directive on Cyber Security Framework
- Key Items for Consideration SECP Circular and Leading Practices
- Way Forward / Action Plan
- Q & A Session



### 



# Life was so much easier when Apple and BlackBerry were just fruits.

Anonymous quote on Twitter

## APR 2019

# **DIGITAL AROUND THE WORLD IN APRIL 2019**

THE ESSENTIAL HEADLINE DATA YOU NEED TO UNDERSTAND GLOBAL MOBILE, INTERNET, AND SOCIAL MEDIA USE

CHANGES IN DATA PROVIDER METHODOLOGIES MEAN THAT DATA ON THIS SLIDE IS NOT DIRECTLY COMPARABLE TO DATA IN OUR PREVIOUS REPORTS









# A Mobile Networked Planet

5 Billion (2/3) of World's Population is Connected via Mobile

8 Billion Connections Globally  $\rightarrow$  Connected Machines

## APR 2019

## **ANNUAL DIGITAL GROWTH**

THE YEAR-ON-YEAR CHANGE IN KEY STATISTICAL INDICATORS

CHANGES IN DATA PROVIDER METHODOLOGIES MEAN THAT DATA ON THIS SLIDE IS NOT DIRECTLY COMPARABLE TO DATA IN OUR PREVIOUS REPORTS



## JAN 2017

# **DIGITAL IN ASIA-PACIFIC**

KEY STATISTICAL INDICATORS FOR THE REGION'S INTERNET, MOBILE, AND SOCIAL MEDIA USERS





## PAKISTAN

THE ESSENTIAL HEADLINE DATA YOU NEED TO UNDERSTAND MOBILE, INTERNET, AND SOCIAL MEDIA USE







### ANNUAL DIGITAL GROWTH THE YEAR-ON-YEAR CHANGE IN KEY STATISTICAL INDICATORS





### JAN 2019

## **DEVICE USAGE**

PERCENTAGE OF THE ADULT POPULATION\* THAT USES EACH KIND OF DEVICE [SURVEY-BASED]



C

## JAN 2019

# **FREQUENCY OF INTERNET USE**

HOW OFTEN INTERNET USERS ACCESS THE INTERNET FOR PERSONAL REASONS (ANY DEVICE)







# **MOBILE CONNECTIONS BY TYPE**

BASED ON THE NUMBER OF CELLULAR CONNECTIONS (NOTE: NOT UNIQUE INDIVIDUALS)





## APR 2019

## SHARE OF MOBILE WEB TRAFFIC BY MOBILE OS

BASED ON EACH OPERATING SYSTEM'S SHARE OF GLOBAL MOBILE WEB REQUESTS





# **FINANCIAL INCLUSION FACTORS**

PERCENTAGE OF THE POPULATION AGED 15+ THAT REPORTS OWNING OR USING EACH FINANCIAL PRODUCT OR SERVICE





# APR 2019

# **SOCIAL MEDIA ADVERTISING AUDIENCES**

A COMPARISON OF THE TOTAL ADDRESSABLE ADVERTISING AUDIENCES\* OF SELECTED SOCIAL MEDIA PLATFORMS

/ CHANGES IN DATA PROVIDER METHODOLOGIES MEAN THAT DATA ON THIS SLIDE IS NOT DIRECTLY COMPARABLE TO DATA IN OUR PREVIOUS REPORTS





### Technology Changed / Shape our Life





### AI and Machine Learning to reshape how banks do business









# Increased use of information technology means greater exposure to cyber attacks



# The More we're Dependent on technology, the More we're vulnerable







**Employees are responsible** for 27% of all cyber security incidents

Source: PwC GSISS 2018



### EE 6DE5 90 1880780 No business is **immune** from a data breach.

6DE 6

### It's a global problem! -30%

B

DOBB

29812



### Why is cybersecurity Important ?

- *Cyber security* risks are now *commanding Top level attention* as businesses are transformed by digital technologies.
- ✓ Shared responsibility that requires *cross functional disciplines*.

# What valuable assets do I have?



- The global threat is increasing
- ✓ Every Minute 1 website has been hacked
- ✓ Every Minute 450 attacks in the world (36% more than 2017)
- ✓ Every Day 300,000 Social Media accounts compromised
- $\checkmark\,$  Every Day 200,000 Viruses are generated
- ✓ Every Day 1.9 Million Records compromised

No longer just an IT challenge but a priority issue for ALL



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### Cyberattacks are headline news everyday

THE WALL STREET JOURNAL.       Confidential report lists U.S. w         Global Finance: Data Breach To Cost Card Processor       designs compromised by Chine		zeapons system ese cyberspies	POLITICO onsidering cybersecurity incentives		THE WALL STREET JOURNAL. U.S. Charges Snowden in Security-Leak Case	
Hackers steal £650 million in world's biggest bank raid         Image: Steal £650 million in world's biggest bank raid         Image: Steal £650 million in world's biggest bank raid         Image: Steal £650 million in world's biggest bank raid         Image: Steal £650 million in world's biggest bank raid         Image: Steal £650 million in world's biggest bank raid         Image: Steal £650 million in world's biggest bank raid         Image: Steal £650 million in A.T.M. Scheme         Image: Steal £650 million in A.T.M. Scheme		Obama executive order seeks better defense against cyber attacks Qatar National Bank hit by a cyber attack		Obama to confront Chinese president over spate of cyber-attacks on US US president to meet with Xi Jinping over latest allegation that Chinese hackers gained access to US weapons systems		
Cyberspace the new frontier in Iran's war with foes 1129 words 24 October 2012		Sunday Main Book - News <b>China telecoms giant could be cy</b> James Cusick		yber-secu	rity risk to Britain	Latest waves of cyber attacks targeting US corporations
CUICK Heal Malware Report: Cyber 391 words 3 January 2013 THE WALL STREET JOURNAL. Iran Blamed for Cyberattacks U.S. Officials Say Iranian H	Distributed by Configure 551 words 4 December 2012		Brave new world of multi- phase cyber attacks looms Christopher Joye 1085 words 9 January 2013 The Australian Financial Review			
propakistani						
Hackers Steal Money from Standard Chartered Accounts by Hacking ATMs	BankIslami Customers Lose Over \$6 Million in Biggest Security Breach in Pakistan's History			<b>DISCLAIMER</b> een taken from public domain so no claim is made for accuracy,		
Pakistani Hackers Involved in \$81 Million Bangladesh Bank Heist	Habib Bank Gets Hacked, Databases Leaked Online!			pieteness, o	ormation are made.	
	Hackers Steal Money from Bank Customers Once A	Faysal gain!				



### Cyberattacks are headline news everyday



### A World of Targets with Increased Value



### The STAKES are HIGH !!!!!

There are two types of companies: those who have been hacked, and those who don't yet know they have been hacked.

John Chambers Chief Executive Officer of Cisco

"Cybersecurity is no longer just about deflecting attackers.

Today, it's about figuring out how to manage and stay ahead of intruders who are already inside the organization"



### The 5 Most Cyber Attacked Industries





### Why do Breaches Happen?





of Boards have no mechanism to **measure** security effectiveness

## 1 in 4 Companies

fails to conduct Cyber Security Risk Assessment due to lack of resources and expertise.



**59%** of ex-employees admitted to stealing company data when leaving jobs.

# 2018 IN A NUTSHELL



# Who's behind the breaches?

### 75%

perpetrated by outsiders.

### 25%

involved internal actors.

### 18%

conducted by state-affiliated actors.

#### 3%

featured multiple parties.

#### 2%

involved partners.

### 51%

involved organized criminal groups.



#### 62%

of breaches featured hacking.

### 51%

over half of breaches included malware.

### 81%

of hacking-related breaches leveraged either stolen and/or weak passwords.

43%

were social attacks.

### 14%

Errors were causal events in 14% of breaches. The same proportion involved privilege misuse.

8%

Physical actions were present in 8% of breaches.


## **Global Cyber Security Breaches**

Key cyber threat scenario	Banking System infiltrated by the hackers	Leak of sensitive information by APT attack	<b>Ransomware attack targeting users</b>
Typical threat actors	Organized Crime, Hackers, hacktivists	Hackers, hacktivists, chancers	Organised Crime, Nation states
Primary Motivations	Financial Gain	Financial Gain, Identity Theft	Financial gain, espionage
	Bangladesh Central Bank	YAHOO!	150 Countries
Recent example	A Bangladeshi central bank official's computer was used by unidentified hackers to make payments via SWIFT. Most of the transfers were blocked but about \$81 million was sent to multiples banks out of country	In 2016, Yahoo announced that hackers have stolen 3 billion user account details resulting decline in stock price.	On May 12 a strain of ransomware called WannaCry spread around the world, walloping hundreds of thousands of targets, including public utilities and large corporations, NHS hospitals and facilities in UK



## **Global Cyber Security Breaches**

Key cyber threat scenario	Malware attack targeting critical IT Infrastructure	<b>Infiltrate using phishing email</b> containing sophisticated malware.	Malware attack targeting critical IT Databases
Typical threat actors	Organised Crime, Nation states	Nation states	Organised criminals, Hackers
Primary Motivations	Financial Gain, Espionage	Financial gain, competitive advantage, espionage	Financial Gain, Identity Theft
Decent	Aramco In 2012, In a matter of hours, 25,000 computers were	Anthem.	PREMERA

Recent example In 2012, In a matter of hours, 35,000 computers were partially wiped or totally destroyed. Saudi Aramco's ability to supply 10% of the world's oil was suddenly at risk. Hackers breached health care insurance provider affecting record of 78.8 million users, costing damages worth minimum (\$115 million)

More than 11 million healthcare policyholder accounts were possibly compromised when criminals used a 'developer' computer to access sensitive database, costing approx \$10 million.



What is Cyber Security ?

Cyber Security is a set of principles and practices designed to safeguard your computing assets and online information against threats.





#### Most Common Cyber Security Attacks

Hacking	Illegal Intrusion into a computer system or network with(out) destructive motives / intention.
Ethical Hacking	Legal intrusion into a computer system or network with motive of discovering weaknesses and loopholes in the system.
Cyber Crime	Computer used as an object or subject of crime.
SPAM	Programs designed to send a message to multiple users, mailing lists or email groups
Zero Day Exploits	An unknown vulnerability in an information system.
Malware	Botnets, Backdoors and Key Loggers
Identity Theft	Stole your ID and Important Information to commit fraud
Denial of Service Attack	Attempts to flood a network to disrupt the service / emails and prevent accessing it.



#### Most Common Cyber Security Attacks

## RANSOMWARE : THREAT TO BUSINESS

Ransomware is serious threat to business, it is a special kind of virus used by hackers to lock access to important files on user's computers; and they ask for money (ransom as they've virtually kidnapped the files) to unlock the files again. Imagine that you have important client files to be delivered and they just got locked by Ransomware *- I know your heart skipped a beat..* 

#### HOW YOU GET INFECTED



Virus delivered as email attachment OR embedded link.



Visiting infected websites which deliver malware automatically.



Using Unknown USB Drives - they may contain malware.

- 300,000 Systems
- 150 Countries
- Payment via Bitcoin
- Lateral Movement

## Impacts

- UK 20 Hospitals
- Spain / Portugal (Telecom
- Russian (Banking)
- Germany (Railway)
- US FADEX
- China Universities
- Japan 600 Companies



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#### Most Common Cyber Security Attacks



Scams involve an attacker masquerading as a trusted person using real credentials to infiltrate an organization's computer system.

- Shoulder Surfing (Visual Hacking)
- Dumpster Diving
- Eavesdropping
- Persuasion
- Online Communication



#### Phishing

#### RE: INSTRUCTION TO TRANSFER OVER DUE PAYMENT OF \$5.8M

From: Rev.Lee Johnson Add to Contacts

Sent: Mon, Apr 18, 2016 at 4:38 pm

To: Recipients

INTERNATIONAL FINANCE CORPORATION. LEICESTER CURRENCY CHEQUE/DRAFT DEPARIMENT TELEGRAM: FENFOREX

RE: INSTRUCTION TO TRANSFER OVER DUE PAYMENT OF \$5.8M

#### ATTENTION:

This is to inform you that this office received payment advice from  ${\rm Th}_{\rm Series}^{\rm From}$ Corporation (NNFC) in conjunction with the Ministry of Finance of the To to you the total amount of US\$5.8 Million. Note that a final approval your funds have been transferred from the International Finance Corpor final authority to transfer out of the shores such amount of Fund.

We have just received an email from one MR. KAMICHI \*\*\*\*\* who introduc that you have instructed him to receive the funds into his account on informed us that you are dead also that the instruction was given to h him to forward the copy of the letter you gave him but have not yet he

THIS IS THE ACCOUNT DETAILS HE FORWARDED TO US: Bank Name: MIZUHO BANK, NARIMASU BRANCH. Address: 2-11-2, NARIMASU, ITABASHI-KU, TOKYO, JAPAN SWIFT CODE: MSDKBGHUT. Bank Account No: 239-1-563-321. Beneficiary: ROS LID. (KAMICHI BLAKE)

We are writing you to confirm this message and if it is not true, you notifying us of the need to rectify this fallacy. Please note that a g would be required to ascertain the authenticity of your claim. This off details on how to obtain the transfer Authorization code which proves fund as we don't want the fund to get to the wrong hands. Since that i needs for the transfer of your fund to your designated bank account.

We await your urgent response. Rev. Lee Johnson

This email has been checked for viruses by Avast antivirus software, https://www.avast.com/antivirus

Suspicious Activity On Your Online Account From: Chase Online Add to Centects Sent: Thu, Apr 21, 2016 at 3:18 pm To: walt\_turnet@securewebapps.com

#### CHASE 🕒

#### Account Suspension

We are writing to inform you about the suspension of your account, a series of suspicious activities are detected in your account by our monitoring system. This is a precautionary step taken by our monitoring systems to try and catch fraudulent activities before they happen.

#### Possible events occurred

- 1. Log in attempts from an unusual or unrecognized device or location.
- 2. Too many incorrect log in attempts

3. Requesting any banking operation using unusual pattern.

To enable your account you will have to authenticate your identity so that all the limitations from your account can be removed.

#### Confirm now

Thank you, Chase

Date : 03-10-2016

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Your Bank Of America Security Update From: Bank Of America Add to Contacts Sent: Fri, Mar 11, 2016 at 3:07 pm To: Recipients

Bank of America 🤎

#### Activity Alert

PERSONAL CHECKING/SAVINGS ACCOUNT IP-Conflict detected on your account

d Customer,

g you know that we've detected multiple IP-Conflict on your online account, suit to restrictions and closure of your online account, Kindly verify your low to ensure the safety of your assests and online account.

tion click SIGN ON to restore and ensure the safety of your Account .

#### curity Checkpoint

m the authenticity of messages from us, always look for this Security pint. You last signed in to Online Banking on 18/02/2016.

ber: Always look for your SiteKey® before entering your Passcode. We'll ask your Online ID and Passcode when you sign in.

vice email from Bank of America. Please note that you may receive service emails in with your Bank of America service agreements, whether or not you elect to receive email.

#### vacy Notice.

reply directly to this automatically generated email message.

erica Email, 8th Floor-NC1-002-08-25, 101 South Tryon St., Charlotte, NC 28255-0001

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Vishing - Video

# WATCH THIS HACKER BREAK INTO MY CELL PHONE ACCOUNT IN 2 MINUTES



## The Hacker's / Bad Actors Objectives

- Denial of data access (blocking someone from accessing a storage device).
- Intellectual Property (IP) theft (stealing the top secret formula for a soft drink).
- Inflicting loss of reputation through exposure of sensitive information (revealing a political candidate's tax returns or medical records).
- Creating *loss of trust* in a corporation (exposing a bank or credit card institution's security weakness).
- *Extortion* (demanding a ransom payment in return for restoring one's data access or keeping sensitive data from becoming public).
- *Kinetic effect* (having something happen in the real world—such as shutting off a power grid, controlling a patient drug infusion device, or controlling an airplane).



#### **Insider Threats**

An insider threat is the threat posed by an employee, contractor, or other person who has access to a company's information and systems.

- Working Odd Hours
- Unauthorized Removal
- Seeking Info
- Unauthorized Devices
- Foreign / Domestic Travel
- Unreported Contacts
- Bragging
- Disgruntlement
- Unexplained Affluence
- Unnecessary Copying





## What's the impact of a cyber attack? Security Compliance Drivers

<b>Direct Costs</b>	<b>Indirect Costs</b>	<b>Intangible Costs</b>	
Investigation & Remediation	Increased Cyber Insurance Premium	Damage to Brand	
Regulatory Sanctions/penalties	Customer Fraud/ write offs	Heads Roll	
<b>Customer Redress</b>	<b>Class Action Law Suit</b>	Competitive Disadvantage	



### What are Organisations thinking about?



#### 1. Protecting Assets

- Cybersecurity
- Data Breaches
- Data Privacy Protection



- 2. Innovation
  - Data driven decisions
  - Engaging Business Partners
  - Targeting Masses



#### 3. Continuous Improvement

- Improve Productivity
- Minimize Losses
- Scalability & Flexibility

#### IT / IS Regulations and Circulars in Pakistan



#### State Bank of Pakistan

Guidelines on Business Continuity Planning
Information Technology Security
IS Guidelines on audits and system switchover
Prevention against Cyber Attack

✓ Security of Internet Banking – PSD
✓ Payment Card Security – PSD
✓ Outsourcing of IT Services
✓ Security of Digital Payments – PSD
✓ Few in Draft Stages
*Prevention of Electronic Crime Act -2016*

- $\checkmark$  Unauthorized access to information system and data
- ✓ Unauthorized copying or transmission of data
- $\checkmark$  Cyber terrorism
- $\checkmark$  Electronic forgery
- $\checkmark$  Electronic fraud
- ✓ Tampering etc. of communication equipment
- $\checkmark$  Unauthorized interception
- $\checkmark$  Malicious code
- $\checkmark$  Spamming
- ✓ Spoofing

Enterprise Technology Governance and Risk Management Framework

#### **Other Countries**

- Bangladesh
- EU
- France
- Germany
- India
- Ireland
- Israel
- Malaysia
- Saudi Arabia
- Singapore
- South Africa
- USA



## Synopsis of

## SECP's Directive on Cyber-Security Framework

#### Jobs Near You



#### See More Jobs

...

#### Framework

- Continuous
- Proactive
- Predictive
- Adaptive
- Distil key lessons
- Monitor developments
- User Metrics based maturity assessment



## SEC Directive on Cybersecurity Framework for Insurance Sector 2019

- 1. Developing cybersecurity framework and mechanisms
- 2. Alignment of Cybersecurity Framework with overall Risk Management Framework
- 3. Appointment of Chief Information Security Officer (CISO)
- 4. Insurers to conduct cybersecurity framework and risk assessment
- 5. Regulatory Reporting
- 6. Data Security and Confidentiality
- 7. Insurers to obtain cyber risk insurance
- 8. Insurers to have adequate cybersecurity systems in place
- 9. The Cybersecurity Framework for Insurance Sector



## Summary - Directive on Cyber-Security Framework for Insurer(s)

- ✓ The Security and Exchange Commission of Pakistan has proposed Directive on 8<sup>th</sup> January, 2019 under section 12 of the Insurance Ordinance, 2000. Suggestions in 14 days.
- ✓ The Directive will be effective from  $1^{st}$  March, 2019 (still under discussion)
- ✓ The framework will apply to all Life and non-Life Insurers including family and general takaful operators.
- ✓ Accordingly, the Insurer(s) have been required to upgrade their systems, controls and procedures.
- ✓ The framework is not "one-size-fits-all" and implementation of the same shall be risk-based and commensurate with size, nature and types of products and services and complexity of Technology Infrastructure, network operations, delivery channels of the Insurer(s).
- ✓ Framework is being enhanced with extensive consultation with both internal & external stakeholders and will serve as baseline requirement for all Insurers(s)
- ✓ Cybersecurity decision requires a very wide spectrum of involvement from corporate governance down to penetration testing and vulnerability analysis.
- ✓ Framework is based on principles of international standards and best practices for cyber security and cyber-risk management. It aims to provide enabling regulatory environment for managing risks associated with the use of technology.



## Summary - Directive on Cyber-Security Framework for Insurer(s)

- ✓ SECP encourages Insurer(s) to form cybersecurity framework and consider collection of standards and best practices. These include NIST Cybersecurity Framework, ISO 27000 series and ISACA's CobIT. SECP also encourages to consider FSB - Stocktake of Publicly Released Cybersecurity Regulations, Guidance and Supervisory Practices, and IAIS draft application paper focusing on Supervision of Insurer's Cybersecurity.
- SECP has further advised the Insurer(s) to follow a phased approach towards implementation of the framework starting with a gap analysis between their current status and this framework, development/update of the policy framework, on-the-ground implementation and follow up review and feedback.
- ✓ The Cyber-Security framework shall be integrated and aligned with the Insurer(s) overall enterprise risk management program and shall be approved by Board.
- ✓ Appointment of CISO as Senior Executive (Independent to IT) responsible for implementation of cyber security framework and report status to the Board twice a year.
- ✓ Board of Insurer shall be ultimate responsible for setting strategy and ensuring cyber risk management.
- ✓ While implementing this framework, Insurer(s) are expected to exercise sound judgment to determine the applicable provisions relevant to their cyber risk profile.



## Summary - Directive on Cyber- Security Framework for Insurer(s)

#### **Board Responsibility and Reporting**

- ✓ Annually Risk assessment program on cybersecurity framework, risk acceptance criteria (RAC) and implementation measures. Justification shall be endorsed for overriding normal RAC.
- ✓ **Immediately Significant changes** (Pre and Post Implementation) or any Cyber Incident

#### **Commission / Regulatory Reporting**

- ✓ Within 6 months to this Directive Submission of "Statement of Compliance"
- ✓ Annually (by April 30) Compliance Statements and Cybersecurity framework assessment report signed off by CISO, CEO and independent auditor (if applicable)
- ✓ CISO shall make available to the Commission to explain steps taken after cybersecurity risk assessment.

#### Non-Compliance to this Directive

✓ Imposition of penalty under section 40A of the SECP Act, 1997 - 10 million rupees or may extendable 100,000 rupees / day.



### Summary - Directive on Cyber-Security Framework for Insurer(s)

- ✓ Cyber security framework include secure configuration of hardware, operating systems, software, applications, databases and servers with unnecessary services / programs disabled or removed.
- ✓ Data security framework drives insurer's responsibility for safety and confidentiality of policy holder data including adoption of "Prevention of Electronic Crimes act 2016".
- ✓ Data security framework shall ensure encryption at database level, storage level and during network transmission as per the classification and sensitivity of the data i.e. data at-rest, in-transit and in-storage.
- ✓ Data security framework includes protecting the policyholder data in the wake of enhanced reliance on business process outsourcing (BPO), technology based agency arrangements and other strategic partnerships for offering technology based innovative insurance products and services.
- ✓ In all arrangements (BPO, Agency, Strategic Partnerships etc.) the privacy and fair usage of data clause must be part of SLA between the insurer and the counterparty.
- ✓ All insurers and relevant business shall only collect information necessary to provide insurance services to the policyholder or potential policyholder through the technology based platforms.
- ✓ Express consent of policy holder shall be undertaken for full knowledge of data collected, frequency, purpose and further sharing with other party.



### Summary - Directive on Cyber-Security Framework for Insurer(s)

- ✓ BoD / Sr. Management shall **cultivate awareness** and commitment to cybersecurity at all levels.
- ✓ All insurers should consider obtaining the cyber risk insurance to cover their own cyber risks, to which they are exposed, however effective system of controls remains the primary defense against cyber threats.
- ✓ Cyber Risk Insurance ideally cover against Cyber extortion, Data Breach / Asset loss, Business Interruption.
- ✓ Cyber insurance coverage options may be structured as first-party (Direct Expenses) or thirdparty (by financial institutions) coverage.
- Performing proper due diligence to understand available cyber insurance coverage such as scope, terms, exclusions, not one-size fit all policy terms, impacts, financial strength, paying history etc.)

Overall Insurer should follow a Continuous Learning approach with review of cybersecurity strategy and framework and when events warrants, including its governance, risk and control assessment, monitoring, response, recovery, and information sharing components—to address changes in cyber risks, allocate resources, identify and remediate gaps, enhance user awareness and incorporate lessons learned.



## **Major Areas**

## SEC Directive on Cybersecurity Framework for Insurance Sector



#### **Cybersecurity Strategy and Framework**

- Articulate principles How Insurer intend to address cyber risks and strategy should be closely aligned with framework to achieve enterprise objective.
- Framework Objectives Maintain and promote insurer's ability for cyber incident response (Anticipate, detect, withstand, contain and recover), limit likelihood and impact.
- Cyber security Policy framework (Policies, Standards, Procedures)
- Cyber Security Infrastructure People, Process and Technology
- Clearly defined roles and responsibilities / Organization Structure (BOD, Senior Management, Risk Management Committee, ITSC etc.)
- Alignment with Integrated enterprise risk management framework with consistency on all areas of risks such as Physical security, HR security etc.
- Cyber Security Risk Management (Identification of cyber security objectives and risk tolerance, mitigate and manage cyber risks associated with loss of CIA)
- Every risks shall be "owned" by a single name individual to ensure accountability.
- Regular review / update and monitoring of cyber security framework at defined frequency to remain effective.
- Threat Intelligence, Industry Collaboration and Situational awareness (proactive identification within the Insurer ecosystem)



### **Risk and Control Assessment**

The insurers shall identify functions, activities, products, and services—including interconnections, dependencies, and third parties—prioritize their relative importance, and assess their respective cyber risks," and to "identify and implement controls—including systems, policies, procedures, and training—to protect against and manage those risks within RAC as set by BoD.

- Identification and classification of functions Information assets and interconnections
- Prioritization of protection, detection, response and recovery efforts of insurer
- Inventory or mapping Identification and maintenance of a current inventory or mapping of its information assets and system configurations. Risk assessment shall be performed and risk identified shall be managed i.e. reduction, acceptance, avoid or transfer.
- Identify dependencies according to asset classification and system configuration including 3rd party (vendors, cloud services providers, outsourced functions etc).
- Individual and system access rights management (access controls) Need to know and Need to have.
- Integrate identification efforts with other processes such as systems acquisition, project management, change management, operations and delivery etc.
- Business Impact Analysis for identified cyber risks arising from both external and internal sources.



#### **Monitoring / Continuous Monitoring**

The insurers shall establish systematic monitoring processes to rapidly detect cyber incidents and periodically evaluate the effectiveness of identified controls, including through network monitoring, testing, audits, and exercises.

Effective monitoring helps entities adhere to established risk tolerances and timely enhance or remediate weaknesses in existing controls," and testing and auditing protocols provide essential assurance mechanisms.

- Protect overall network (hardware, firmware and software components)
- Security Operations Centre (SOC)
- Early Detection and Containment
- Monitoring anomalous activities.
- Behavior / Signature based detection mechanisms
- Misuse of access including 3<sup>rd</sup> party and integrated with cyber threat intelligence program
- Identities and Credentials for physical, logical and remote access based on least privilege / SoD.
- Multi-layered detection controls Defense in depth covering people, process and technology
- Effective intrusion detection capability IDS / IPS / DLP / Event data aggregation
- Incident Response and Forensic Investigation Ready Infrastructure



#### **Testing**

Insurers shall rigorously tests all elements of their cybersecurity framework to determine their overall effectiveness before being employed within an insurer, and regularly thereafter.

The insurers shall consider using a combination of the available state-of-the-art testing methodologies and practices.

Currently, such state-of-the-art testing methodologies and practices, includes:

- Vulnerability Assessment
- Scenario- Based Testing
- Penetration Testing
- Red Team Test
- Response testing
- Integrated or Dynamic Testing



#### **Response**

The insurers shall, in a timely manner,

- assess the nature, scope, and impact of a cyber incident;
- contain the incident and mitigate its impact;
- notify internal and external stakeholders (such as law enforcement, regulators, and any other authorities, as well as shareholders, third-party service providers, and customers as appropriate); and
- coordinate joint response activities as needed."
  - Awareness and Training
  - Investigation
  - o Systems back up
  - Plan to resume critical operations
  - Access to external experts
  - Develop and test response, resumption, and recovery plans
  - System and process to support incident response
  - Responsible disclosure of potential vulnerabilities
  - Policy and procedure to meet the disclosure obligations
  - Forensic investigations



#### **Recovery**

The insurers shall be able to resume operations responsibly, while allowing for continued remediation, including by

- eliminating harmful remnants of the incident;
- restoring systems and data to normal and confirming normal state;
- identifying and mitigating all vulnerabilities that were exploited;
- remediating vulnerabilities to prevent similar incidents; and
- communicating appropriately internally and externally.

They shall consider the following while adopting recovery practices.

- Validated plans and procedures
- Timely recovery (such as "golden copy" of critical data)
- Review and improvement (Incident and Disaster Recovery)
- Contagion risk (propagation of malware or corrupted data due to 3<sup>rd</sup> party interconnection)
- Formal plans for communicating with all stakeholders.



## **Information Sharing**

- Timely sharing of reliable, actionable cybersecurity information with internal and external stakeholders.
- Cybersecurity information (i.e. threats and indicators, how vulnerabilities exploited, incidents, and responses) to enhance defenses, limit damage, increase situational awareness, and broaden learning.

The insurers may consider the following in respect of information sharing regarding cybersecurity.

- (i) Information sharing (IRT based on joint efforts of Insurers)
- (ii) Business-specific context (enhanced decision making)
- (iii) Ability to understand threats posed by external service provider (Cyber threat intelligence operations)
- (iv) Make cyber threat intelligence available to appropriate staff within the insurer having responsibility for the mitigation of cyber risks at the strategic, tactical, and operational levels.



## Way Forward / Action Plan



Today's Major Take Away ????





#### *How to Implement ????*





Action Plan / Way Forward

- 1 Implement Cyber Security Management Framework
  - ✓ Establish appropriate cyber governance inc. senior sponsorship and board level MI
  - Maintain a current asset inventory and identify crown jewels / critical assets, critical stakeholders.

fails to conduct Cyber Security Risk Assessment due to lack of resources and expertise.

- ✓ Conduct comprehensive risk assessment to determine Cyber Security capabilities, threats and weaknesses based on recognised framework (ISO, NIST etc.) and regularly assess against standard and regulatory requirements.
- ✓ Develop relevant policies, procedures, SOPs and templates.
- ✓ Implement internal assessment methods and ensure technical vulnerability assessment is performed quarterly and pen test annually
- ✓ Perform Business Impact Analysis and Develop detailed BCP / DRP with drills including ability to respond
- ✓ Implement automated solutions to monitor / track all types of Cyber attacks.
- Create and practice a broad cyber security incident response mechanism including security incident types, inventorize resources and assets, recovery plan hierarchy of communication flow, prepare variety of public statements
- ✓ Implement a probe the practices and procedures with respect to 3rd Party cybersecurity





✓ Encrypt critical Information assets and stored securely



## Action Plan / Way Forward

- 3 Implement Layered (Defense in Depth) Security
  - ✓ Incorporate a consistent and comparable approach for security controls selection.
  - ✓ Implement Layered Security across organization (People, Process and Technology)
  - ✓ Physical and Environmental controls
  - $\checkmark \ Instrument \ your \ environment \ with \ effective \ detection \ and \ threat \ intelligence$
  - ✓ Having a Patching solution that covers your entire Infrastructure







## **Critical Security Controls**

- 1. Inventory of Authorized and Unauthorized Devices
- 2. Inventory of Authorized and Unauthorized Software
- 3. Secure Configurations for Hardware and Software on Mobile Devices, Laptops, Workstations, and Servers
- 4. Continuous Vulnerability Assessment and Remediation
- 5. Controlled Use of Administrative Privileges
- 6. Maintenance, Monitoring, and Analysis of Audit Logs
- 7. Email and Web Browser Protections
- 8. Malware Defenses
- 9. Limitation and Control of Network Ports, Protocols, and Services
- 10. Data Recovery Capability

- 11. Secure Configurations for Network Devices such as Firewalls, Routers, and Switches
- 12. Boundary Defense
- **13. Data Protection**
- 14. Controlled Access Based on the Need to Know Basis
- **15. Wireless Access Control**
- **16. Account Monitoring and Control**
- 17. Security Skills Assessment and Appropriate Training to Fill Gaps
- **18. Application Software Security**
- **19. Incident Response and Management**
- **20. Penetration Tests and Red Team Exercises**



## Action Plan / Way Forward

4 – Security Awareness and Training

Your business is only as secure as its weakest link. Get comprehensive Cyber Security Awareness Training for your employees to avoid a possible breach.




## Action Plan / Way Forward





- Peter Drucker



# **Example – End User Awareness**

- Create and maintain strong password and passphrase.
- Avoid reusing the same password for multiple accounts.
- Do not use automatic logon functionality
- Secure your Mobiles with Pin Code.
- Secure your computer with Antivirus, Patches and update regularly.
- Protect the data you are handling and Backup Regularly.
- Assess risky behavior online and equip yourself with InfoSec knowledge.
- All "Company" correspondence should be sent from an official email address
- Avoid opening attachments / clicking on links from an untrusted source
- Avoid providing your user ID /password or any confidential information in an email or in a response to an email



• No use of Public WIFI

# **<u>STOP</u>**, and <u>THINK</u>, BEFORE you <u>CLICK</u>



# Action Plan / Way Forward

- 5 Cyber Insurance (Assessing the Exposure)
  - ✓ To mitigate losses for malicious attacks, data breaches, business interruption and network failure
  - ✓ Implementation of standards / best practices for basing premiums more coverage.
- 6 A Digital Forensics/Cyber Incident Response Firm on Call.
  - ✓ Hire expert to investigate and create a defensible record if challenged later on (e.g. by regulators, user auditors, partners, customers, etc.)
- 7 Logging and Monitoring Capabilities.
  - ✓ Implement Incident event logging management system for servers, firewalls, IDS and user's systems
  - Log retention, preservation and permanent deletion system
- 8 Lessons Learned from Prior Attacks.
  - ✓ Management should review after the fact and organize and document the lessons learned
  - Create Inventory of attacks experienced, the specific actions and lesson learned from prior attacks
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# **Overview of Standards**



#### NIST – Cyber Security Framework





#### **Information Security Management System**

An information security management system (ISMS) is a framework of policies, procedures, guidelines and associated resources to establish, implement, operate, monitor, review, maintain and improve information security **for all types of organizations.** 





### Synergies with ISO 27001 & NIST





# Business Continuity and Disaster Recovery Plan



# Major Steps in Contingency Planning









# Thank You!