



Balancing Compliance and Operational Security Demands

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What is more important?

- Compliance with laws / regulations
- Following industry best practices
- Developing a operational practice

The most important issue is getting the senior leadership to support your vision

Fire Marshal vs Firefighters



Federal – Government Focused

- ▶ Federal Information Security Management Act (FISMA) [Law]
- ▶ Risk Management Framework (RMF) for Department of Defense Information Technology (IT) [DoD cyber]
- ▶ Intelligence Community Directive (ICD) 503 [IC cyber]
- ▶ Federal Risk and Authorization Management Program [Cloud]
- ▶ North American Electric Reliability Corporation (NERC) [Energy]
- ▶ General Services Administration (GSA) / Office of Management and Budget (OMB) [Gov cyber]
- ▶ National Institute of Standards and Technology (NIST) [Guide]
- ▶ Executive Order on Cybersecurity / Presidential Policy Directive on Critical Infrastructure Security and Resilience [Framework]

Federal Financial Institutions Examination Council Cybersecurity Assessment Tool

- The Assessment provides a repeatable and measurable process for institutions to measure their cybersecurity preparedness over time
- Assessment is in two parts:

➤ Risk -

Category: Technologies and Connections	Risk Levels				
	Least	Minimal	Moderate	Significant	Most
Total number of Internet service provider (ISP) connections (including branch connections)	No connections	Minimal complexity (1–20 connections)	Moderate complexity (21–100 connections)	Significant complexity (101–200 connections)	Substantial complexity (>200 connections)

➤ Controls -

Maturity Levels	
Innovative	
Advanced	
Intermediate	
Evolving	
Baseline	

Federal - Commercial Focused

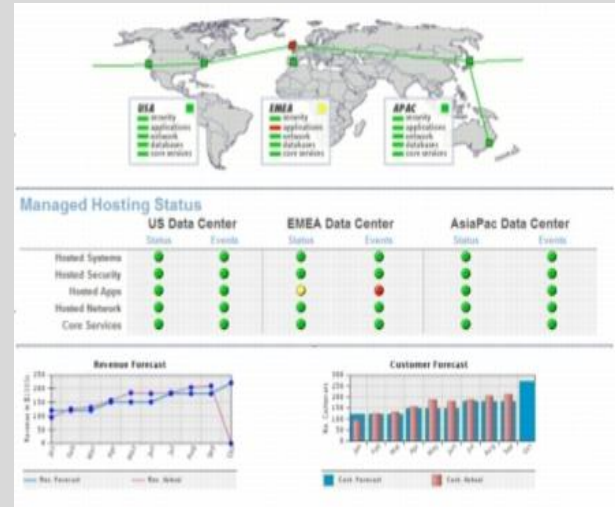
► Medical

- Health Insurance Portability and Accountability Act (HIPAA)

► Business

- Payment Card Industry (PCI) [credit cards]
- Gramm Leach Bliley Act (GLBA) [financial institutions]
- Sarbanes Oxley Act (SOX) [public companies]
- Statement on Standards for Attestation Engagements (SSAE) 16
- Service Organization Control (SOC)1 / 2 / 3

Motivations



Standards - Policies / Process / Audit

- ▶ Control Objectives for Information and related Technology (COBIT) by ISACA
- ▶ Factor Analysis of Information Risk (FAIR)
- ▶ Operationally Critical Threat, Asset, and Vulnerability Evaluation (OCTAVE) by CMU CERT
- ▶ ADversary View Security Evaluation (ADVISE) by CMU CyLab
- ▶ Information Assurance Technical Framework (IATF)
- ▶ GTAG 15: Information Security Governance

Standards continued

- ▶ International Organization for Standardization (ISO)
- ▶ National Institute of Standards and Technology (NIST)
- ▶ IT Infrastructure Library (ITIL) [IT focused, light on security]
- ▶ Six Sigma [cost efficiencies]
- ▶ Capability Maturity Model Integration (CMMI) [process]

GRC

- ▶ Governance
 - Policy / Controls (ie IDM)
 - Vendors (connections)
- ▶ Risk
 - Risk Appetite
- ▶ Compliance
 - Law / Regulation
 - Industry Standard
 - General Framework / Standard



Three layers of defense

- ▶ The First Line of Defense: Line Management
- ▶ The Second Line of Defense: Functional / Support Management
 - InfoSec
 - Compliance
 - Risk Register / Radar
 - Self Identified
- ▶ The Third Line of Defense: Internal Audit

Adjacent Functions and Focus Areas

- ▶ Audit
- ▶ Privacy
- ▶ Fraud
- ▶ Loss Prevention
- ▶ Physical Security
- ▶ eDiscovery
- ▶ Threat Intelligence
- ▶ Insider Threats
- ▶ Remediation
- ▶ Mergers and Acquisitions (M&A)

DevOps

- ▶ Change Control
 - Documentation
 - Testing
- ▶ Security
 - Peer review
- ▶ Separation of Duties
 - Two person dev teams

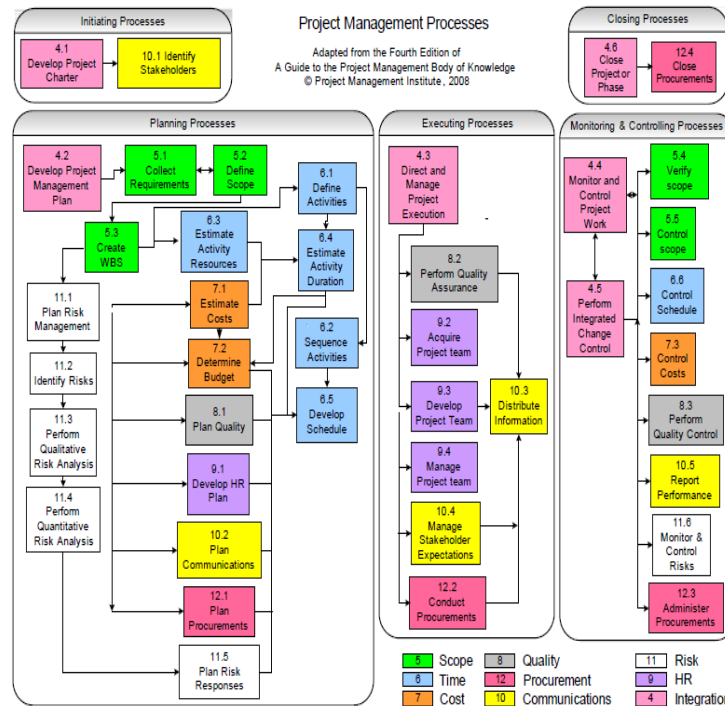
Identity Management / Access reviews

- ▶ Quarterly Access Reviews
- ▶ Automation
- ▶ Manager engagement
- ▶ HR engagement
- ▶ Network and Application security
- ▶ Tracking transfers within company
- ▶ Network vs Application access

Major Event Incident Response (Breach)

- ▶ Plan – Prepare, Detect (pre internal, external not public, external public), Respond (contain and remove), Recover (remediate)
- ▶ Roles – Leadership, CIO, CISO, Privacy Officer, Legal, Human Resources, Privacy, Risk and Audit
- ▶ Contracted external support – PR, Forensics, Legal
- ▶ Determine triggers and thresholds
- ▶ Communications and use of Attorney Client Privilege
- ▶ Exercise

Techniques



Key Components of a Program

► Programmatics

- Strategy (Business, IT and Security)
- Threat profile
- Risk profile
- Special req like 10K cyber statements
- Metrics / Visualization

Program Drivers

- ▶ Impacts analysis
 - Loss of Intellectual Property (IP)
 - Loss to brand reputation
 - Legal (fines / law suits)
- ▶ Impact of Legislation
 - New reg or laws like PCI 3.1, NERC CIP 5 or NIST Security Framework

Management Drivers

► Organizational structure

- Review effectiveness and efficiencies of Information Security Organization Policies and Procedures
- Security monitoring and incident response plan
- Investigations (forensics and e-discovery)
- Business Continuity Plan / Disaster Recovery Plan
- For companies developing software – software assurance process and tools

Leadership Drivers

- ▶ Organization issues
 - Relationship between compliance, audit, privacy, fraud, security (physical and cyber) and business needs
 - Culture of the organization
 - Vulnerability Assessment & Penetration Test program
 - Access management program
 - Mobile device protection program
 - Social Media management program
 - Supply line issues identification

Who we are talking to determines what we talk about



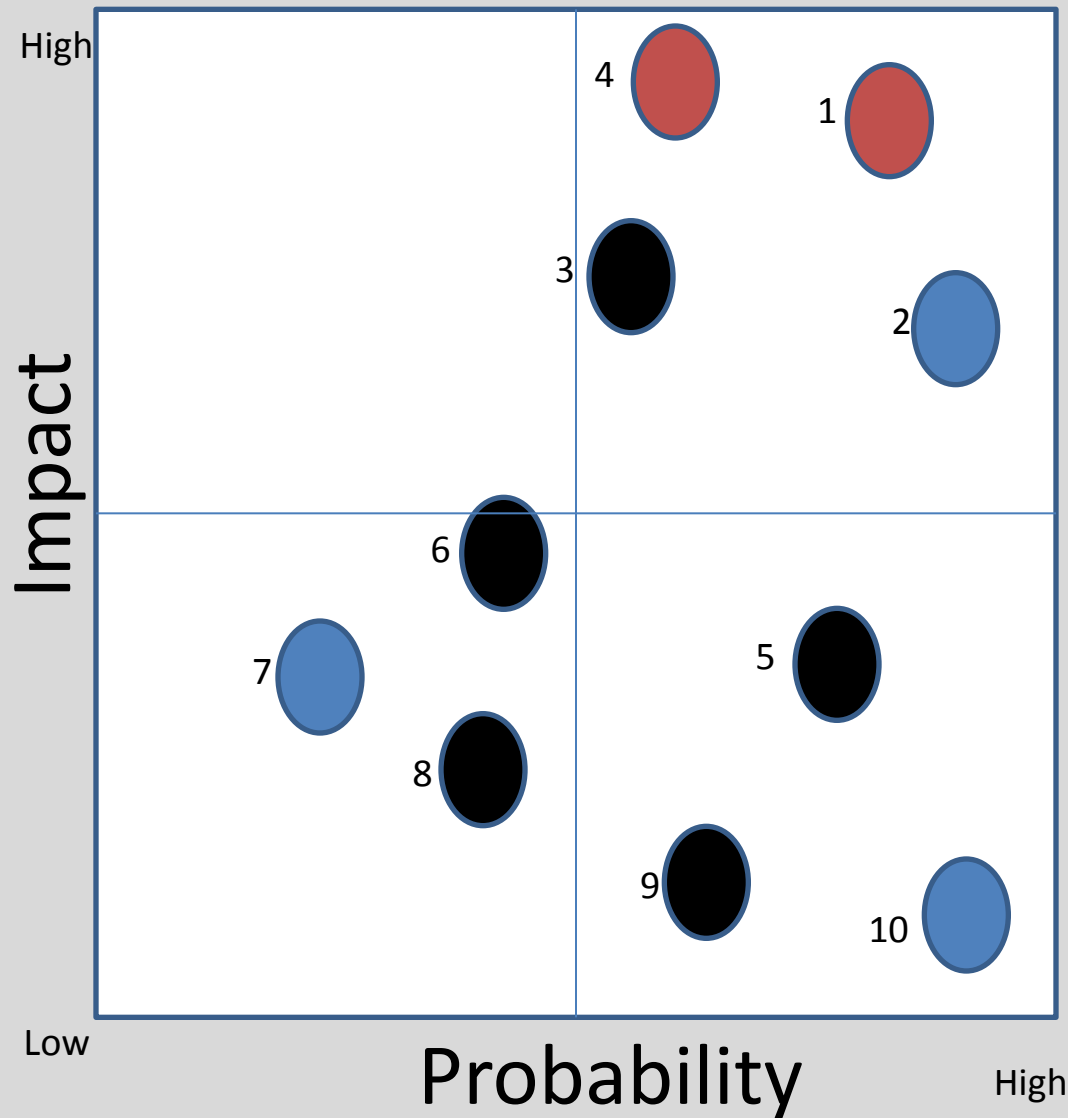
Tying it together

- ▶ Risk Radar / Register
 - Risk Control based
- ▶ Talk to resources and impacts

**Ensure leadership is equipped to
make decisions about accepting
risk**

Sample Risk Radar

(based on control weakness)



Control

1. Compliance

2. Training

3. Asset Man

4. SOC

5. Upgrade FW

6. Insider Threat

7. Policy Dev

8. Encryption

9. BC/DR

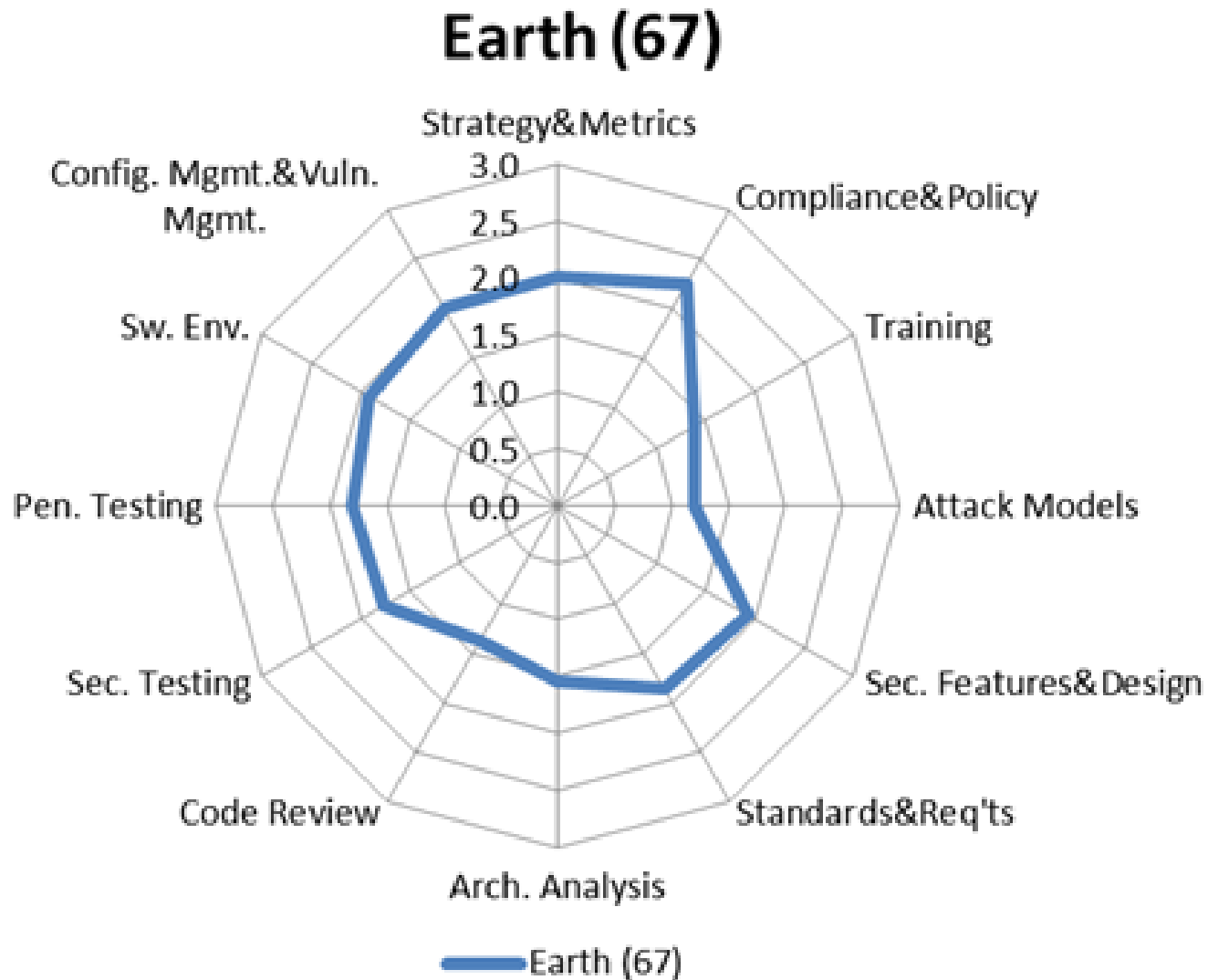
10. Pen Testing

Under \$50K

\$50K to \$500K

Over \$500K

Spider Chart



Heat Map / Probability Chart

SAL 3 - FR 1 - vLAN 20

		Likelihood of occurrence				
		A	B	C	D	E
Severity	Process control network impact	There is a small likelihood of occurrence in the industry, however no known cases exist.	Has occurred in the industry, but only for targeted attacks executed by nation-state / cyber terrorism	Has occurred in the industry, but only for targeted attacks.	Has occurred in the industry, for targeted and non-targeted attacks.	Frequent occurrence in the industry.
Severe	Permanent disruption of LoC or LoV of process control functionality. The device(s) can't be recovered within RTO.		1.2.1	1.12.1	1.6.1	
Critical	Temporary disruption of LoC or LoV of process control functionality, auto recovery or recovery after restart within RTO. Permanent disruption of LoI. The device(s) can be recovered within RTO.			1.12.2 1.13.1		
Marginal	Temporary disruption of LoI, auto recovery or recovery after restart within RTO.					
Negligible	Temporary disruption of non critical functions that auto recover from disruption.					

What's next

- Your job is to make sure leadership understands the risks and are equipped to make decision on where to accept it
- Build consensus on criteria, definition, impact ranking and visualization of risk.
- Implement a plan based on return on impact of risk mitigation

Questions



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THE CYBER THREAT LANDSCAPE

THREATS

ATTACK

ATTACKERS

TARGETED CAPABILITIES

BANKING MILITARY LAWS HEALTH
LAW ENFORCEMENT TRANSFORMATION

NATIONAL CRITICAL INFRASTRUCTURE

AVIATION CHEMICAL
ENERGY MANUFACTURING STATE
COMMERCE EMERGENCY SERVICES

PLANS
ORGANIZATION TRADE SECRET
E-MAIL

CORPORATE

PROPRIETARY FINANCE
PROPOSALS POLICY

CREDIT CARD
FINANCE
BANK CREDIT

HEALTH

PERSONAL

SOCIAL NETWORKS

WINDOWS SPENDING HABITS

VOIP

CLOUD APPLICATIONS

I.T. INFRASTRUCTURE

CONFIGURATION ARCHITECTURE
CISCO
WEB PAGES

DEFENSIVE MOUNTAIN RANGE

DEFENSE-IN-DEPTH TOOLS

ENCRYPTION
INTRUSION DETECTION SYSTEM
FIREWALLS
ANTI-VIRUS
METRICS

SECURITY OPERATIONS CENTER

INCIDENT RESPONSE TEAM
VULNERABILITY ASSESSMENTS
PENETRATION TESTS
FORENSICS

CONFIGURATION MANAGEMENT

PATCHING
POLICIES
ACCESS CONTROL

IDENTITY MANAGEMENT

AUTHENTICATE
AUTHORIZE
AUDIT (PDI/PCI/SOX/GLB)

RISK MANAGEMENT

SITUATIONAL AWARENESS
DISASTER RECOVERY
CONTINUITY OF OPERATIONS
DUE CARE / DILLIGENCE
ANNUALIZED LOSS EXPECTANCY

KEY EDUCATION TECHNIQUES

TRAINING
• LEADERS
• SYSTEM ADMINS
• USERS
• SECURITY
HONEYPOTS
VIRTUAL
• MACHINES
• WORLDS
KNOPPIX

CYBER WARFARE

ADVANCED PERSISTENT THREAT (APT)

DIGITAL SPYING CHINA
ESPIONAGE RUSSIA
NIGERIAN SCAMS
RUSSIAN BUSINESS NETWORK

ORGANIZED CRIME

PHISHING
CUSTOM BANK ATTACKS

DISGRUNTLED

INSIDERS

FINANCIALLY MOTIVATED UNINTENTIONAL
POLITICAL RELIGIOUS
CULTURAL

HACKTIVISM

NATIONAL PRIDE
TERRORIST

SOCIAL HACKING

GROUP MEMBERSHIP

SCRIPT KIDDIES (NOOBS)

CHALLENGE STATUS
CURIOSITY
ENTERTAINMENT

METHODOLOGY

RECON

SCANNERS
SNIFFERS
PACKET CRAFTERS

ATTACK

EXPLOIT VULNERABILITIES
COMPROMISE APPLICATIONS
CRACK PASSWORDS

EXPLOIT

CONFIDENTIALITY
INTEGRITY
AVAILABILITY

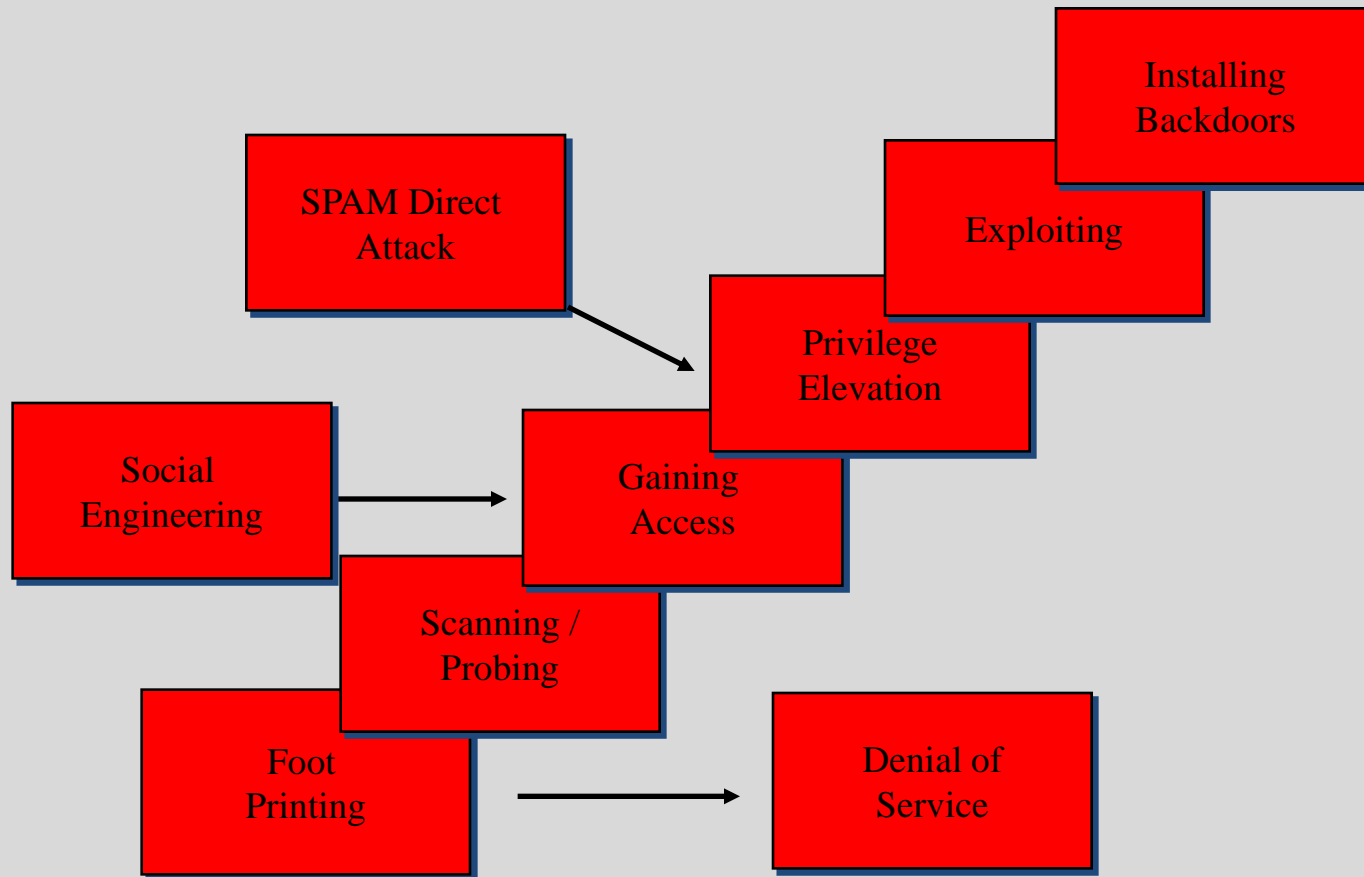
SOCIAL ENGINEERING

VIA TECHNOLOGY
VIA HUMAN

TOOLS AND TECHNIQUES

ROOTKIT NESSUS
WEB ATTACKS TROJAN HORSE
BOTNETS PHYSICAL THREAT WORMS
ZOMBIES METASPLOIT
VIRUSES SOCIAL NETWORKS
SQL ATTACK PHISHING
BACKDOORS PHARMING
SPEAR PHISHING WIRELESS
MOBILE CROSS-SITE SCRIPTING
DISTRIBUTED DENIAL OF SERVICE (DDOS) CAIN & ABEL
WIRESHARK BUFFER OVEFLOW
SPAM DATABASE ATTACKS

Anatomy of an Attack



STOP. THINK. CONNECT.

STOP. Before you use the Internet, take time to understand the risks and learn how to spot potential problems.

THINK. Take a moment to be certain the path is clear ahead. Watch for warning signs and consider how your actions online could impact your safety, or your family's.

CONNECT. Enjoy the Internet with greater confidence, knowing you've taken the right steps to safeguard yourself and your computer.

Visit <http://www.stopthinkconnect.org> for more tips on safety online.

