Third-Party Risk Management Workbook

Myths Vendor Pre-Assessment Risk Profile Tiers Inventory Due Diligence Checklist Risk Remediation Checklist Risk Acceptance Third Party Risk Management Process Integration





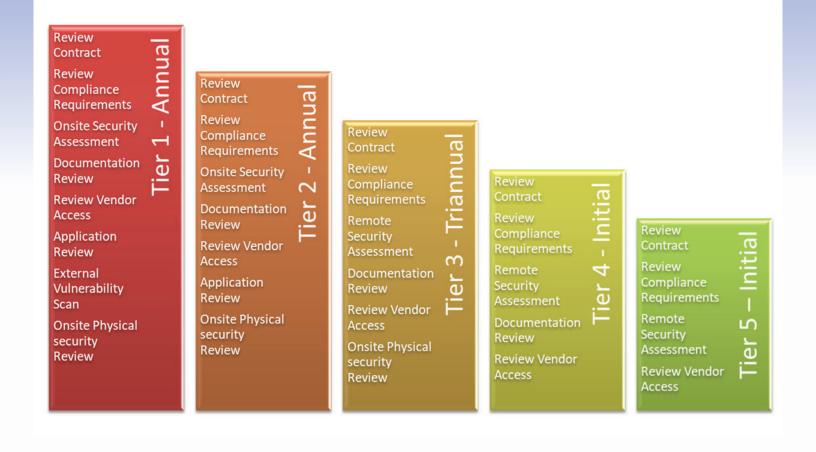
Vendor Pre-Assessment

Vendor Pre-Assessment						
TO BE COMPLETED / VALIDATED BY REQUESTOR						
Business Partner Name						
Contract Number or Title						
Business Unit utilizing this Business Partner						
Executive Owner for this Business Relationship						
Vendor Contact Information i.e. POC, name, phone, email, etc.						
Vendor Locations Information						
Provide a detailed description of the services that the Business Partner will be providing.						
List the data elements that will be shared with the vendor?						
What is the volume of records sent and how often?						
Is the information shared with the vendor protected by legal, contractual and regulatory requirements i.e. PII, ePHI, or financial information?						
Have SLA agreements been defined; what are the acceptable downtime requirements?						
Does the vendor have external access to our network i.e. physical access, remote access, VPN, Site-to-Site, etc.?						
How is the data transferred to the vendor i.e. email, fax, SFTP, etc.?						
Does the vendor have access to the data at rest?						
What is the value of the contract and how long is the term?						

Inherent Risk Profile

		Inherent F	Risk Profile		
Vendor:		Hyper Analytics	Inherent Risk:	High	_
Date:		1/1/2019	Vendor Tier:	Tier 1	1
Factor	Low	Minimal	Moderate	Significant	High
Type of information	No Data	Public information, non-regulated	Internal use only information (e.g., policies, procedures, routine memorandums)	Confidential infor- mation, intellectual property (trade secrets).	Regulated information (PII, NPI, PHI, cardholder data)
Volume of Information	1 – 100 of Records	100 – 1,000 of Records	1,000 – 10,000 of Records	10,000 – 500,000 of Records	500,000 + of Records
Legal and Regulatory Requirements	Not regulated legally or by contract	Statement of Work	Subject to contractual requirements mandating the exercise of due care	Subject to GLBA, SOX, GDPR, FACTA, etc.	Subject to PCI DSS, FFIEC, HIPAA
Criticality of Service to Business	No SLA (Service Level Agreement) requirements	Services can be unavailable for more than a month without materially dis- rupting "ACME"'s business	Services unavailability for one week to one month will materially disrupt "ACME"'s business	Services unavailability for less than a week will materially disrupt "ACME"'s business	Service unavailability for less than a day will materially disrupt "ACME"'s business
External Access	No External Access	Remote access session monitor by internal personnel	Vendor is issued a remote access client or web portal access	Site-to-site VPN tunnel; remote access client terminates on internal systems	Internal network/systems hosted on external vendors infrastructure
Data Transfer Services	No Data Transfer	Secure file transfer to Vendor	Secure file transfer from Vendor	Insecure file transfer to or from Vendor	Vendor has direct access to internal data
Access to Data at Rest	No access to data rest	Monitored Vendor access to internal data at rest	Vendor granted assess as needed to internal data at rest	Vendor has unmanaged authenticated access to internal data at rest	Data at rest on internal or external Vendor managed systems
Size of Commitment	Cost is less than \$50,000, one-time	Cost is less than \$50,000, one year term, impacts few "ACME" users	Cost between \$50,000 and \$100,000, two to three year term, impacts dozens of "ACME" users	Cost between \$100,000 and \$500,000, three to five year term, impacts dozens of "ACME" users	Cost greater than \$500,000, greater than five year term, impacts hundreds of "ACME" users
Number of Statements Selected in each Risk					
Once a risk rating is selecte combination. Third Party ri	ed for each risk factor, the ov isk manager will review the c	verall inherent risk rating for combination of risk factors a	the third party service prov nd assign a given Vendor Tie	Once a risk rating is selected for each risk factor, the overall inherent risk rating for the third party service provider is calculated taking into account multiple combination. Third Party risk manager will review the combination of risk factors and assign a given Vendor Tier, see Tab (Due Diligence Tiers)	account multiple rs)

Vendor Inherent Risk Tiers



Service Provider Inventory

UP For ReviewContract IDVendor NameLeftLeftLeftLeftDataReviewAquiroxCredit ReportingFor FirstData TypePieroData24/201824/201824/2018HotoolAquiroxCredit ReportingFor ePhil PrivatePieroTier2/1/20171/1/20171/1/2017HotoolLagui HillShredingPrivateLowTier2/1/20171/1/20171/1/2017HotoolLagui HillShredingPrivateModerateNoderate1/1/20171/1/20171/1/2017HotoolUntedtramoLogisticsPrivateModerateModerate1/1/20171/1/20171/1/2017HotoolUntedtramoLogisticsPrivatePieroSignificantTier 11/1/20181/1/2018HotoolData TherabyData AnalyticsPrivatePieroSignificantTier 11/1/20181/1/2018HotoolData TherabyData AnalyticsPrivateSignificantTier 11/1/20181/1/20181/1/2018HotoolData TherabyData AnalyticsPrivatePieroSignificantTier 11/1/20181/1/2018HotoolData TherabyData AnalyticsPrivatePieroSignificantTier 11/1/20181/1/2018HotoolData AnalyticsPrivatePieroSignificantPieroPiero1/1/20181/1/2018HotoolSecureZipeData AnalyticsPrivatePiero </th <th></th> <th></th> <th></th> <th>Service Provider Inventory</th> <th>vider Inver</th> <th>itory</th> <th></th> <th></th> <th></th>				Service Provider Inventory	vider Inver	itory			
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HC0003T.T. RonaldLogisticsPrivateModerateTifer 210/1/20171HC0004UntredtransLogisticsPrivateModerateTifer 27/1/20177HC0005Hyber AnalyticsData AnalyticsPrivateModerateMiler 11/1/20187HC0005Hyber AnalyticsData AnalyticsPrivatePrivateMiler 11/1/20181HC0005Data TherabyData AnalyticsPrivateSignificantTifer 11/1/20181HC0005Epic ImageData AnalyticsPrivateSignificantTifer 11/1/20181HC0005Epic ImageData CleansingPrivateSignificantTifer 11/1/20161HC0009SheediezzShedingPrivate-FHIMinimalTifer 11/1/20161HC0010SheediezzShippingPrivate-FHIMinimalTifer 11/1/20161HC0011UberDataData AnalyticsPrivate-FHIMinimalTifer 31/1/20161HC0012SheediezzShippingPrivate-FHIMinimalTifer 31/1/20161HC0012UberDataData AnalyticsPrivate-FHIMinimalTifer 31/1/20161HC0012UberDataData CleansingPrivate-FHIMinimalTifer 31/1/20161HC0012UberDataData CleansingPrivate-FHIMinimalTifer 31/1/20161HC0012HU0012UberData	2 	HC0002	Liquid Hill	Shredding	Private	Low	Tier 3	1/1/2017	1/1/2019
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		HC0025	AmzSure	Data Analytics	Private	Moderate	Tier 2	9/1/2017	9/1/2019

	Due Diligence Checklist (I	nitial and Subsequent)	
Item	Characteristics	Commentary / Observations	OK?
Logal Daviau	Contract Review: Y / N		
Legal Review	Compliance Review: Y / N		
	SOC: 1 / 2 Type: I / II		
	Auditor:		
Audit Report	Test Period:/ to/		
	Opinion: Qualified / Unqualified		
	Control Exceptions? Y / N		
Financial	Issued://		
Statements and	Audited? Y / N Profitable? Y / N		
Credit	Excessive Debt? Y / N		
Information	D&B Credit Rating:		
	Dated://		
BC / DR Plan	Comprehensive? Y / N		
	DR Site: None / Cold / Warm / Hot		
	Date of Last Test://		
BCP / DRP Test	Successful Recovery? Y / N		
Results	Met RTOs? Y/N RPOs? Y/N		
	Liability Limits:/		
22	Carrier:		
Insurance	Cybercrime? Y / N		
Coverage	Business Resumption? Y / N		
	"ACME" is Named Insured? Y / N		
	Type: Merchant / Service Provider		
PCI Data	PCI Level: 1/2/3/4		
Security	QSA:		
Standard	ROC/AOC? Y/N Date:/		
	SAQ: A/B/C/D Provided? Y/N		
	Type: ISO 27001 / SysTrust / WebTrust /		
	Other:		
	Certifier:		
	Date of Issue://		
	Tests: Pen Test / Social Engineering /		
Results of	ability Scans		
Independent Testing	Tester:		
	Report Date:		
	Satisfactory Results? Y / N		
Security Review	Security Questionnaire? Y / N		
	Onsite Assessment? Y / N		
	Offsite Assessment? Y / N		
	Documentation Review? Y / N		
Security	Security Incidents Reported? Y / N		
Security	Timely Notification? Y / N		
Incidents	Addressed Satisfactorily? Y / N		
	SLA / SLO Reports Received? Y / N		
Performance	SLA / SLOs Met? Y / N		
Indicators	Complaints Noted? Y / N		

Risk Remediation Matrix

Risk Remediation Matrix

Notes: For the following items please indicate if you agree to remediate or not (Y/N). If no, please explain why not and what controls you already have in place to mitigate this risk. Also, if you have an alternative remediation plan that is in the same spirit as the proposed countermeasure, that can be implemented instead. The Target Date is established using "ACME" default guidelines. You can always remediate prior to the target due date.

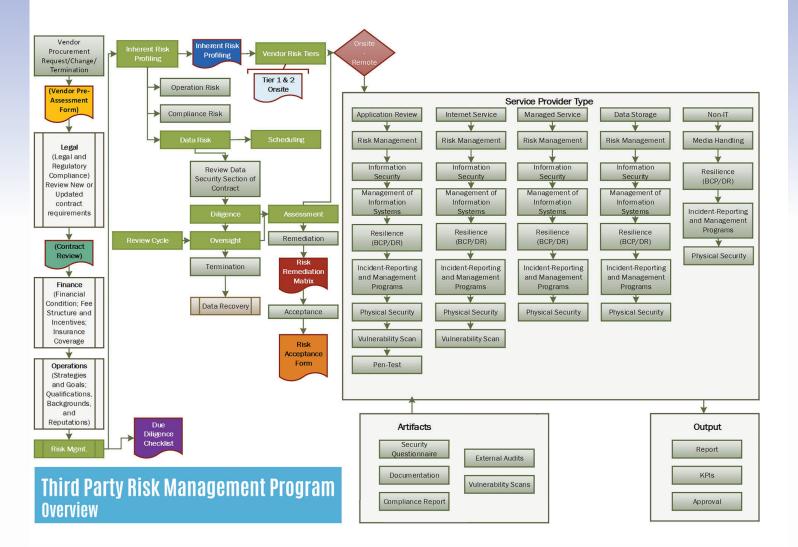
•	Risk Description	Risk Rating	Recommendation	Response Due Date	Owner	Plan to Implement? Y/N	Comments	Alternate Remediation
1								
2								
3								
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6								
7								
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Risk Acceptance Form

			isk Acceptance	Form			Track #
To be completed by the ISMG Represen			ntative				
1. Date: 2. ISMG Representative:			3. Director of IT Security:			:	
	кер	resentative:		(if different	than ISMG Rep)		
4. Business Unit:				5. Chief Te	chnology Officer:		
			6. Technology Info (if applicabl				
Server Name		Operating System	Description	<u></u>	Location	Other Technology	/
			To be completed by the ISM	G Represent	ative		
7. Description of Issue:							
8. D	escrip	tion of Risk:					
9. Com		e Violation,	1				
_		y, Standard,	1				
		c <mark>al Standard</mark> that apply):					
10. Response to sug							
controls o		pliance plan					
	(11	applicable):	To be completed by the Busine	ss/System N	lanager		
11. Description of Business Justification:							
12. Description of Mitigating Controls							
(if applicable):							
13. Plan to bring System, Application		1					
or Risk into Compliance (if applicable)		1					
(Include Timeframe):							
Business/System Owner:					Date:		
ISM	G Rep	resentative:				Date:	
	al Ren	resentative:				Date:	
	a nep	. sontarive.	1			Date.	
(C-Leve	l Repr	esentative):				Date:	

HALOCK maps the current vendor management processes to industry standards and proven risk management frameworks. Though HALOCK evaluates the program to the highest maturity model the goal of the assessment is to develop a portfolio of reasonable recommendations, and controls, to align heightened standards with the organization mission and compliances requirements. Working with risk management stakeholders the assessment focuses on:

- Roles and responsibilities within the risk management program
- Workflow reviews of vendor onboarding, oversight and termination.
- Organizations approach to assigning the inherent risk of third-party relations
- Vendor risk tiers definitions
- Vendor assessment process
- Personnel skillsets
- Current policies and framework



Third Party Due Diligence Review Integration

HALOCK Third-Party Assessment Intergration HALOCK Client Vendor Vendor contract under review **Complete Questionnaire and** send documentation (New & Existing) **Planning Meeting** Planning Meeting (Assessment Overview & (Assessment Overview & **Gather Pre-Assessment** Scheduling) Scheduling) Vendor information Complete Send Planning Document to Planning Document Schedule Perform Inherent Risk Profile Vendor Meetings (Vendor Risk Tier) Book Travel Send Security Questionnaire and Documentation Request List **Documentation Review Schedule Planning Meeting Onsite Assessment** (Controls Review and **Onsite Assessment Planning Meeting** Validation) (Assessment Overview & Scheduling) Reporting Stage Documentation for HALOCK Review **Draft Report Review Draft Report Review Review Report with Vendor Review Report with Vendor Review Report with Vendor Risk Remediation Risk Remediation**

HALOCK[®] FASTSTART Checklist

VENDOR RISK MANAGEMENT

HALOCK's FastStart Vendor Risk Management (VRM) Checklist allows organizations to initiate a formal VRM Program and get started immediately! The 6-step checklist defines the essentials to classify and manage vendors by risk and customize the on-boarding and audit process for each vendor classification tier. When the Board asks about risks posed by third parties, you can respond in business-friendly terms incorporating the organization's obligations, mission, and objectives... and confidently proclaim you are performing your due care!

ITEM 1 Engage Management

Lidentify Vendor Sponsors/Owners – Identify who in your organization are the vendor sponsors and/or owners

- **Research/Build a Case** Do some investigative research and build your case for management by gaining an understanding of how many vendors your company deals with, the types of vendors, the levels of complexity and quantities
- Present Your Findings Describe your case for developing and operating a Vendor Risk Management Program to Executive Management

ITEM 2 Inventory & Classify Vendors

- 🗖 Identify the various legal, regulatory and contractual obligations your organization has that applies to vendors
- Design and implement a series of vendor tiers; 3-5 is a good average
- Assign each vendor to a tier

ITEM 3 Define Assessment Process

Determine what your organization's Calculated Acceptable Risk Definition is - and state it in plain English

- Create an assessment plan
 - Develop tier-specific questionnaires including questions for each process and the controls in use in order to fully understand how a control is being used, operated and monitored
 - Construct criteria for onsite and offsite evaluations
- Create a prioritized assessment calendar
- Develop Vendor Risk Reporting format for Executive Management

ITEM 4 Develop Process for Risky Vendors

Develop a set of options and procedures to address risk (e.g. change vendors, enforce contractual fines, pay or assist in remediation efforts, et al.)

Develop process for following up on risk resolution and escalation (be sure you're closing the loop when a risk has been identified by ensuring the risk has been remediated)

ITEM 5 On-boarding & Contract Management

Construct tier-specific contractual language, including penalties, enforcement, actions, et al.

Develop on-boarding process for vendors

- Understand expected level of sensitive data involved and nature of business
- Assign vendor to tier, conduct baseline assessment, define remediation items required prior to operation, determine risk of not authorizing vendor
- Distribute VRM Guide to potential vendor owners and procurement
- Develop process for updating existing contracts with new requirements, penalties, etc.

ITEM 6 Monitor & Improve

Integrate into overall risk management process (if one exists)

- Schedule recurring vendor management meetings with vendor owners to review vendor risk status
 - Report vendors outside of Calculated Acceptable Risk Definition
 - Obtain status on issue resolution
 - Complete, % fail, total outstanding risk items per vendor, et al.)



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Incident Response Hotline: 800-925-0559

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About HALOCK

Founded in 1996, HALOCK Security Labs is a thought-leading information security firm, that combines strengths in strategic management consulting with deep technical expertise. HALOCK's service philosophy is to apply just the right amount of security to protect critical assets, satisfy compliance requirements and achieve corporate goals. HALOCK's services include: Security and Risk Management (duty of care risk assessments), Compliance Validation, Penetration Testing, Incident Response Readiness, Security Organization Development, and Security Engineering.