Outsourcing Tools & Technology Innovation Chapter



Webinar Meeting – April 21, 2010



Webinar Meeting Agenda 4/21/10

(Times Are EDT)

- 1:00 p.m. IAOP Update & Tools & Technology Innovation Chapter General Topics
- 1:10 p.m. The Use of Tools & Technologies to optimize Risk & Compliance in Outsourcing Contracts/Relationships
 - Bruce Jones, Global IT Security, Compliance, Data Privacy & Risk Manager for Kodak, Inc.
- 1:40 p.m. Q&A and Polling Questions
- 1:50 p.m. Future Chapter Meeting Discussion
- 2:00 p.m. End of Meeting





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- Certified Outsourcing Professional[®] (COP) Program (Attending a chapter meeting earns COP's 1 CEH towards recertification)
- COP Master Class
- The Global Outsourcing 100[®] Program (The Global Outsourcing 100 list and sub lists, World's Best Outsourcing Advisors)
- Outsourcing Professional Code of Ethics

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COP Master Class

May 3-5, 2010 – Cal State University, Fullerton, California

COP Governance Workshop

May 6, 2010 – Cal State University, Fullerton, California

2011 Outsourcing World Summit – Call for Papers Look for more information end of May – beginning of June

2011 Outsourcing World Summit
 February 21-23, 2011 – Indian Wells, California

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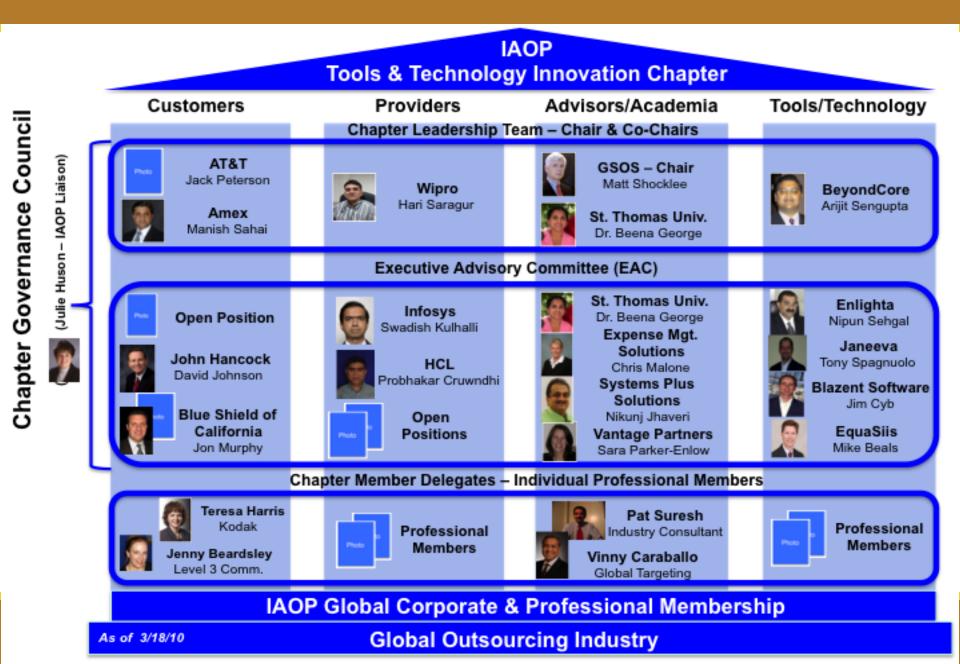
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- Value Health Check Survey An exciting new diagnostic tool that will enhance the value of your outsourcing contracts & relationships! Each IAOP Corporate Member receives two complimentary survey's as part of their annual corporate membership – Call us today to learn more!
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Contact Michael Forbes at <u>mike.forbes@iaop.org</u> for more detailed information on any of these service offerings!



Tools & Technology Innovation Chapter – Governance Model



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Data Protection Supplier Risk Management

IAOP – Outsourcing Tools & Technology Chapter





Approach

- Kodak has a multilevel, tiered approach to Supplier Risk Management
- Key Elements Include
 - High-Level Risk Assessment Tool
 - Security Self-Assessment Tool
 - Ongoing Assessments
 - External Audits
 - Security Self Assessment
 - Specific Contract Language



High-Level Risk Assessment Tool



- This tool is designed to help determine the level of risk to Kodak if there was a data breach
- This tool looks at the following data elements to calculate the risk score
 - Type of data collected
 - Quantity & storage location
 - Retention period
 - Supplier certifications
 - Previous issues
 - Market capital



Question	Answer	Points For "Y" answers	Score
Supplier Name:			
Background Information (optional):			
Type of data collected or accessed - Personal Data for Employees,	Customers or Suppliers		
Unrestricted Internal Use Personal Information	, customers or suppliers	2	(
Confidential Personal Information		10	(
CCD Personal Information		20	
			(
Includes Business (non Personal) CCD Information		10	l
Includes Personal Data from EU Member Country, Canada, Japan, Hong Kong, Russia or Argentina		10	
Quantity & Location of individuals data			
Records for less than X individuals		5	
Records for less than 10X individuals		10	I
Records for 10X or greater individuals		20	1
Data transferred to another country outside the Data Privacy Jurisdiction		50	
Defined store of the bullow he shares	N		
Retained storage time (including backups Transient only)	0	1
Less than 2 years		5	
On-Going		10	
Storage location			
In a Non Kodak Location (Such as a vendors data center)		20	(
Other business attributes			
Supplier has a current ISO 27001 (I.e. ISO 17799) Certification		-40	(
Supplier has a current external PCI Certification		-20	(
Supplier has shared with us a current SAS 70 Type 2 report which has no major issues		-10	1
Kodak has audited them in the last 3 years and found no previous issues		-20	
Kodak has visited the site and had a positive report regarding their security		-10	1
Other issues			
Kodak interfaces to supplier system have a DORA for Tier 2 risks (To be answered by WWIS)		10	(
Kodak interfaces to supplier system have a DORA for Tier 1 risks (To be answered by WWIS)		15	
Supplier has had a previous data loss incident (To be answered by WWIS)		20	
Supplier has had a previous data loss incluent. (To be answered by WWO)		20	
Contract & Indemnification		1	
Does the contract have an appropriate indemnification clause		-15	
Does the vendor have a market capitalization which is greater than \$X		-15	
	Final Score:		0
	r mar ocore.		
Points Scoring			
0 to 25		Do Nothing	
26 to 60:		ISPQ (Self As	sessment)
Greater than 60:		External Audit	Required

Security Self-Assessment Tool



- Excel based self-assessment tool
- 36 Major categories and 128 Questions based on ISO 27002
- Used to gauge the maturity of the supplier security program
- Required for all contracts where supplier will have access to personally identifiable information or highly confidential business data



Security Self-Assessment Major Categories



Information security policy Exchange of Information and software Information security infrastructure **Business Requirements for Access Control** Security of third party access **User Access Management** Outsourcing **User Responsibilities Network Access Control** Accountability of assets Information classification **Operating system access control** Security in job definition and Resourcing **Application Access Control** User training Monitoring system access and use Responding to security incidents and Mobile computing and telecommuting malfunctions Secure Area Security requirements of systems **Equipment Security** Security in application systems **General Controls Cryptographic controls Operational Procedure and responsibilities** Security of system files System planning and acceptance Security in development and support process Protection against malicious software Aspects of Business Continuity Management Housekeeping **Compliance with legal requirements Network Management Reviews of Security Policy and technical** compliance Media handling and Security System audit considerations Information security policy Exchange of Information and software

Example

Kodak
it's time to smile

Microsoft Excel - ISPQ v4.4.xls [Read-Only]					📰 🥖 Handwriting 🔊 Drawing Pad 🥝 📮		
🔄 Eile Edit View Insert	F <u>o</u> rmat <u>T</u> o	ools <u>D</u> ata <u>W</u> indow <u>I</u>	<u>H</u> elp				
	۵ 🕹 🖗	🖹 - 🍼 🖉 - 🕲		🏭 📣 100% 👻 🔮	Arial	• 10 • B <i>I</i> <u>U</u> ≣ ≣ ≣	🗏 🔤 💲 % , 號 🔐 💷
F6 ▼ <i>f</i> ×							
	Independent Service Provider Questionnaire 128 Total Questions					128 Total Questions	
		Hide NA Questions	Show All Questions	Generate Gap List	Answer		Questions Eliminated
ISO 27002	Question		SHOW HIL QUESTIONS		(Y,N,NA)	Clarifying/Suporting Comments	128 Remaining
3.1 Information security po					Whether t	here exists an Information security policy, which is	
3.1.1 Information security	-	e published security p	olicies and procedures	s, which have been		by the management, published and communicated as	
policy document		/ management?			appropriat	e to all employees.	
3.1.2 Review and evaluation		rocess for periodically	reviewing, updating, a	and revising these			
	policies?						
4.1 Information security in							
4.1.1 Management			ensure clear direction	and visible support for			
information security forum	security initi						
4.1.2 Information security	Is there a cross-functional forum to coordinate the implementation of security						
coordination	controls?						
4.1.3 Allocation of				s and for implementing	•		
information security	security processes clearly defined?						
responsibilities							
4.1.4 Authorization process	Is there is a management authorization process for any new information			•			
for information processing	facility including networks, hardware and software?						
facilities							
4.1.5 Specialist information	Is the advise	e of an information sec	curity specialist obtair	ned where appropriate?	'		
security advise							
4.1.6 Co-operation between	Is a list of c	ontacts maintained to	ensure that appropria	ite action can be taken			
organizations	and advice obtained, in the event of a security incident?						
A 1.7 Independent review of	le the imple	mentation of security	noticy reviewed inden	andantly on a requilar	•		

Problems Encountered



- Security Self Assessment filled out with only Y or N answers and no detail
- Suppliers not willing to fill out the Security Self Assessment
- Not a test of the effectiveness of their controls
- Some only want to provide a SAS 70 Report
- BITS Shared Assessment as an alternative

-<u>http://sharedassessments.org/</u>



Ongoing Assessment



- When contracts are renewed, the Security Assessment must be updated
- If supplier falls into High-Risk category we require an annual independent external security audit
- If supplier is ISO 27001 Certified we will accept their certificate in lieu of the Security Self Assessment and audits





- Manual process
- Requires Purchasing Agents to remember to
 - Request an updated Security Assessment
 - Request proof of external audit
- Language barriers



Specific Contract Language

- Use of Data
- Protection of data
 - Meet or exceed ISO 27002
 - Encryption if stored on Laptop or removable media
 - Limit access
- Destruction of Data
- Subcontracting Requirements
- Notification of losses & breaches of data
- Liability & Indemnification
- Audit Requirement
- EU Safe Harbor
- HIPAA
- PCI



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Potential Improvement Opportunities



- Web-enabled system where suppliers can enter their assessments, audit results and updates
- Automated work flow-enabled solution
- Tool that supports multiple languages
- Automated compliance metrics
 - Who has completed their assessment
 - Who has posted their audit results
 - Suppliers past due
 - Other risk metrics (Market Capital, audit issues, etc.)
- Include annual assessment of compliance with Foreign Corrupt Practices Act

Questions





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Tools & Technology Innovation Chapter Schedule As of 4-20-10

Month 2010	Tools Chapter Webinar or Events (Webinars are 1:00-2:00 pm EST)	Chapter Webinar Topic & Presenter(s)
January	None	
February	Tuesday – 2 nd	Outsourcing Value Framework & Health Check Survey Update/Shocklee, ToolsMAP Update/George
February	Monday - 15th at World Summit	All Tools Chapter Members join us at the Tools & Technology Chapter Table during the Showcase
March	Thursday – 18 th	Use of Tools to Optimize Financial Performance of Outsourcing Contracts/Relationships
April	Wednesday – 21 st	Use of Tools to Optimize Risk/Compliance in Outsourcing Contracts/Relationships
Мау	Thursday – 20 th	Use of Tools to Optimize the Contracting Process Partnering with Contract Process Chapter - Mayer Brown, LLC & Contract Process Chapter
June	Tuesday – 8 th 3:30 – 7:00 p.m. Offices of Morrison & Foerster in Downtown, NYC	Use of Tools & Technologies to Optimize Overall Governance of Outsourcing Contracts/Relationships - Joint Meeting with NYC Chapter & Governance Chapter
July/August	No Meetings/Vacation	
Fall 2010 (Sept-Oct)	Date TBD Location: San Francisco Area Joint Chapter Meeting with San Francisco Chapter & Technology Industry Chapter Mega-Chapter Meeting on	Outsourcing Tools and Technology Symposium: - Full day of speakers, demonstrations and hands-on workshops - Location to be determined in SF Bay Area - Sponsorship opportunities - Must confirm within the next 30-45 days if to be held