

SECURITY MEASURE	IN PLACE	
	YES	NO
<p>4. Continuous monitoring. The SEC expects RIAs will continuously monitor for threats and vulnerabilities. Consider integrated platforms that can do just that - monitor, alert, respond to and remediate cybersecurity attacks.</p>		
Evidence of monitoring such as: failed logons, lockouts, elevations, etc.	<input type="checkbox"/>	<input type="checkbox"/>
Vendor due diligence and management	<input type="checkbox"/>	<input type="checkbox"/>
<p>5. Incident response planning and recovery. Every RIA will need a documented incident response plan it can point to in the event of a cyberattack. The plan should be tested for effectiveness and speed of recovery, with gaps addressed to assure business continuity in the event of a significant incident, regardless of where the firm's data resides.</p>		
Business continuity plan	<input type="checkbox"/>	<input type="checkbox"/>
Timely detection	<input type="checkbox"/>	<input type="checkbox"/>
Corrective actions	<input type="checkbox"/>	<input type="checkbox"/>
After action review	<input type="checkbox"/>	<input type="checkbox"/>
Cybersecurity insurance	<input type="checkbox"/>	<input type="checkbox"/>
<p>6. Reporting and disclosures. RIAs will be on the hook for reporting significant qualifying cyber events to the SEC within a relatively short period of time.</p>		
Form ADV-C	<input type="checkbox"/>	<input type="checkbox"/>
Form AV Part 2A	<input type="checkbox"/>	<input type="checkbox"/>
<p>7. Formal accountability. Firms need to establish the internal team accountable for managing cybersecurity risk, addressing cybersecurity threats, and approving cybersecurity policies and procedures. Key point: regardless of whether they outsource cybersecurity, firms are still responsible for that oversight.</p>		
Active senior level engagement	<input type="checkbox"/>	<input type="checkbox"/>
Vendor management:	<input type="checkbox"/>	<input type="checkbox"/>
<ul style="list-style-type: none"> ☀ <i>Due diligence – including how client data is protected</i> ☀ <i>Annual oversight and review</i> 		
<ul style="list-style-type: none"> ☀ <i>Business continuance</i> ☀ <i>Monitoring and testing</i> ☀ <i>Review of written contracts</i> 		

**If you checked NO more than twice, your firm might be at risk.
For a risk assessment, call us at 913.396.4600**

