

Outsourcing Risks Catapulting Information Into the Unknown

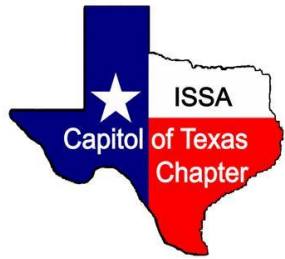
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About

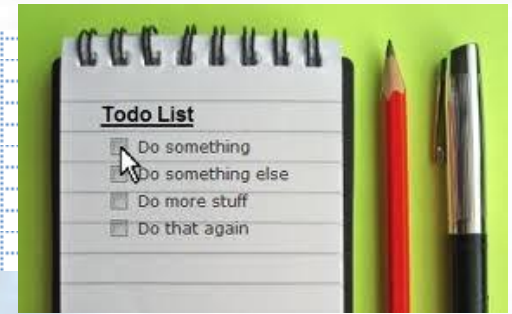


- The preeminent trusted global information security community
- <http://www.austinissa.org>
 - ❖ Monthly Chapter Meetings – numerous additional education events throughout the year

About *TempleInland*

- Low-cost, highly efficient manufacturing company focused on corrugated packing and building products
 - ❖ Containerboard – largest segment of paper market
 - ❖ Building Products – products for residential and commercial construction
- 10, 500 Employees – 82 Locations in U.S., Mexico and Puerto Rico
- \$4 Billion approximate annual revenue

Agenda

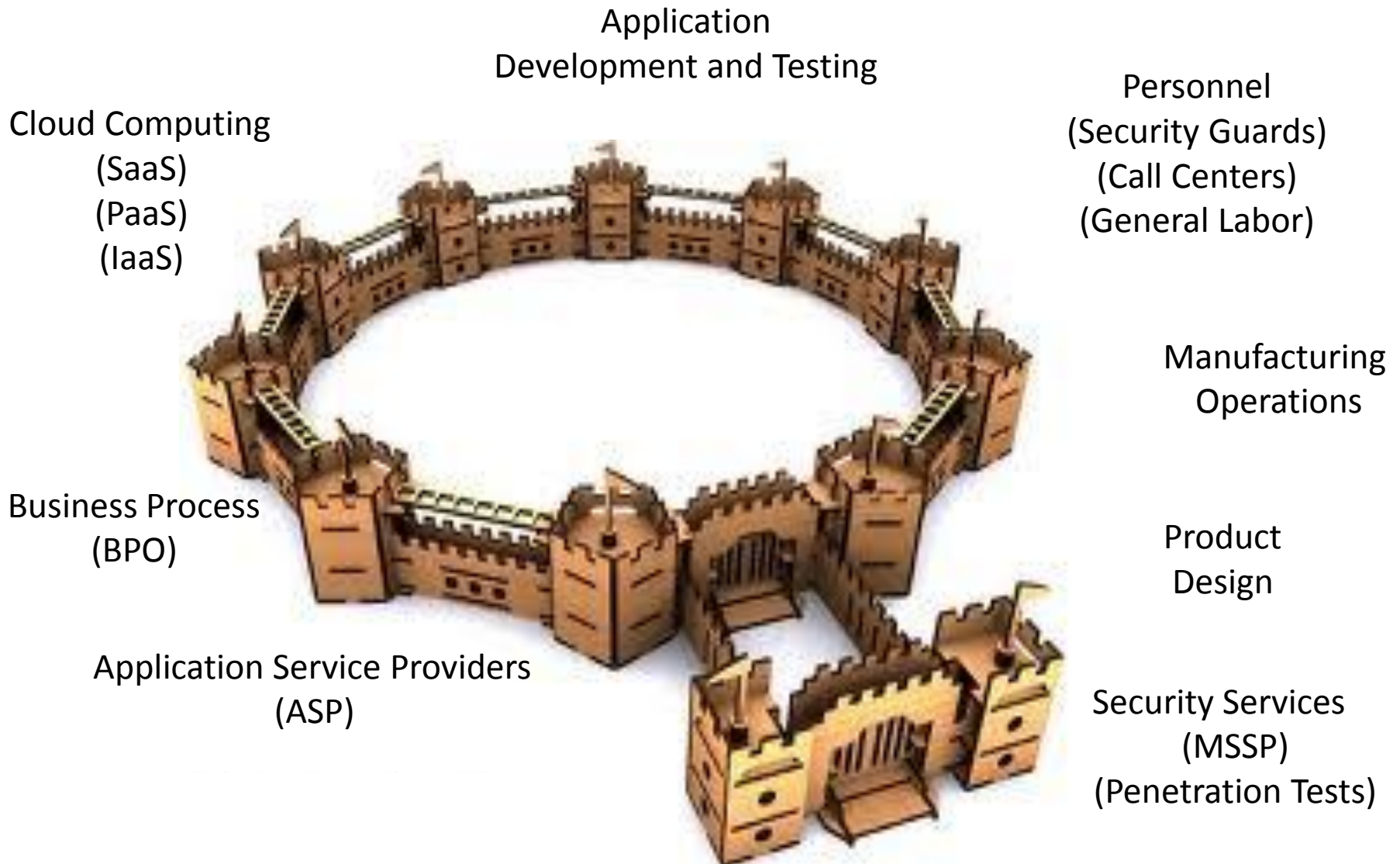


- Acronym Soup and Outsourcing Types
 - The Crumbling Perimeter Wall and Other Paradigm Shifts
- Establishing Ground Zero
 - Baselines Using Frameworks and Standards
- Risk Evaluation
 - Assessing controls from the other side of the world
 - Questionnaires and Surveys
 - Identifying Deficiencies and Gaps to Standards and Expectations
 - Special Considerations
 - Vendor Provided Materials (Product Literature, SAS 70 Reports, and other assorted fairy tales)
- Dealing with the Inevitable
 - Risk Tolerance and Acceptance
 - Contractual Risk Mitigation

Outsourcing Business Drivers



Outsourcing Types



The Crumbling Perimeter Wall



Outsourcing Risks



Some Old...

– Unauthorized Access

- Insider
- External

– Availability Threats

- Denial of Service

– Fraud and Theft

- Insider
- External

– eDiscovery

Outsourcing Risks

Some new...

- Seizure of Infrastructure
- Vendor Viability
- Liability
- International Laws
- Import / Export Considerations



Desired State and Acceptable Conditions



First, define the desired outcome.

Security > Current or Required State

Security = Current or Required State

Security < Current or Required State

There will always be tradeoffs, usually at the sake of security.

Define a Reference Point



Start with a
framework...

- COBIT
- ISO 17799 or ISO 27001
- COSO
- FISMA
- NIST
- ITIL

...to derive your policy
and standards...

...then evaluate the
outsourcing arrangement to
see how they measure up.

Assessing from a World Away

Assessment Challenges

- Observation
- Language
- Social Norms
- Time zones
- Impact to project timing
- Impact to internal staff
- Impact to vendor
- Disclosure Limitations / Confidentiality



Broad Risk Criteria



Broader Company Considerations

- Policies and Standards
- Governance
- Ethics and Business Conduct
- Information Security Management
- Personnel Security (Awareness, Responsibilities)
- Third Party Vendor Management
- Compliance and Legal Requirements
- Insurance

Specific Assessment Criteria



Business Continuity, Backup and Recovery

- Recovery time objectives
- Redundant data centers
- Mirrored data environments
 - Last test of recovery capabilities
- Media handling and security
 - Encrypted backup tapes
 - Secure destruction of retired media
 - Offsite storage

Specific Assessment Criteria



Data and Software Exchange

- Securely transmitting information
- Secure email communications
- Consider ongoing data transmissions as well as any bulk import information loads at onset
- Escrow of application code
- Secure destruction of information
- Record retention considerations

Specific Assessment Criteria



Changes, Enhancements and Modifications

- Change management and revision control
- Development methodology
- Segregation of duties to prevent unauthorized changes
- Rate of change
 - Impact to personnel (training)
 - Mitigation of vulnerabilities
 - Impact to availability

Specific Assessment Criteria

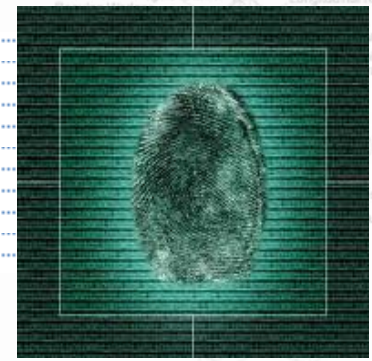


Security Reviews

— Ongoing Internal Analysis as well as Independent, Third Party Analysis

- SAS 70 Audits (Type 1 vs. Type 2)
- PCI-DSS Audits
- Static Source Code Analysis
- Application Vulnerability Analysis
- Penetration Testing
- Overall Vulnerability Assessment

Specific Assessment Criteria



Physical and Environmental Security

— Equipment Protection from Environmental Hazards

- Power, Humidity, Temperature, Fire

— Secure Areas

- Unauthorized physical access
- Surveillance, guards, escorted visitors
- Access logs and authorized access reviews

Specific Assessment Criteria



Protection from Malicious Software

- Malware Prevention Systems
- Incident Detection and Response
- Intrusion Prevention
- Introduction of vulnerabilities from third party, outsourced development

Specific Assessment Criteria



Access Controls

- Authorization for access
- Deactivation
- Periodic Access Reviews
- User Registration, Provisioning, De-provisioning and ongoing maintenance
 - Segregation of Duties
- Access Logs (retention, review, alerting)

Specific Assessment Criteria



Authentication

- Password Expiration
- Password Complexity
- Password Uniqueness
- Initial Password Changes
- User ability to change password
- Limit access from specific sources (IP limits)
- Support for multi-factor authentication

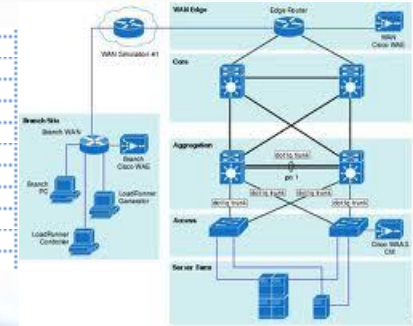
Authentication Special Consideration



Federated Identity Management and Single Sign-On Solutions

- Outsourced applications typically require their own login ID
- Authentication parameters that are not synchronized to internal IDs are problematic for users
- Credential issues include Password Sloth and the temptation to use poor password security

Specific Assessment Criteria



Application Architecture

- Logical separation of client instances
- Physical separation of client instances
- Database integration
- Application component tiers
- Encryption and authentication between tiers
- ***Maintenance utilities***
(Bulk Imports and Data Fixes)

Specific Assessment Criteria

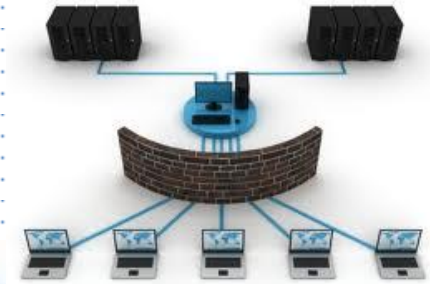


Application Security

- Input Validation
- Injection Flaws
- Insecure Object References
- Cross-Site Scripting
- Cross-Site Request Forgery
- Error Handling

Check out OWASP.org for much more.

Specific Assessment Criteria



Network Architecture

- Network segregation and compartmentalization
- Network Access Controls
- Firewall implementation and upkeep
- Port restrictions
- Intrusion Prevention System implementation and upkeep
- External connection requirements
- Network monitoring
- VPN

Other Materials



Vendor Materials (Propaganda)

- Security Summaries
- Internal White Papers
- Marketing Materials
- Website
- User Guides

Other Data Sources



- Project meetings
- Interviews
- Request For Proposal (RFP) responses
- Vendor presentations
- References

Contractual Mitigation



- SLAs
- Exit Strategies
- Return of Information upon request
 - for any reason, not just at contract expiration or breach
- Requirements for Third Party Evaluations
 - Include requirements for providing reports with sufficient detail
- Ongoing monitoring

Dealing with Risk

- Data Classification
- Elusive factors
 - Impact
 - Probability
 - Motivation
- Hidden Costs
 - Acceptance
 - Mitigation
 - Transference



Audit Considerations



- Have outsourcing arrangements been risk assessed?
- Is the process repeatable, and are there sufficient auditable artifacts?
- Have risks been addressed, mitigated or accepted?
- What cascading risks are present? Who has accepted those?

Questions?



Thank You!

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