

Let's Get This
Third Party
Started!

Cybersecurity
Compliance &
Third Parties

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Neiman Marcus

SuperValu
Real Food, Real People

SONY

Cybersecurity:
A Legal Issue?

An Independent Vision



SALLY
BEAUTY SUPPLY

bebe



TE LODGING

"Security and IT protect companies' data;
Legal protects companies *from* their data."



SUN TZU

THE ART OF WAR

Ancient Cybersecurity Wisdom

- "In all fighting the direct method may be used for joining battle, but indirect methods will be needed to secure victory."
- "You can be sure of succeeding in your attacks if you attack places which are not defended."



KEY FOCUS

- Cybersecurity and privacy law evolves to adapt but necessarily lags behind.
- Look to basic principles and objectives.
- Third party risk objectives focus on protecting—wherever and however—
 - Networks
 - Data

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Agenda

- Data Security Risks Presented by Third Parties
- Regulatory Expectations for Third Party Oversight
- How to Identify Gaps and Issues: The Oversight Process
- How to Address Issues and Changes
- Coordinating Oversight
- How to Avoid Common Mistakes with Oversight



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"Third-Party Vendor Risk Management"