



COMPLIANCE IS A PROGRAM, NOT A PROJECT

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COMPLEXITY REQUIRES MAINTENANCE

“WORKERS BATTLE WIND, SEA
AIR AND FOG....TO REPAIR
CORRODING STEEL.”

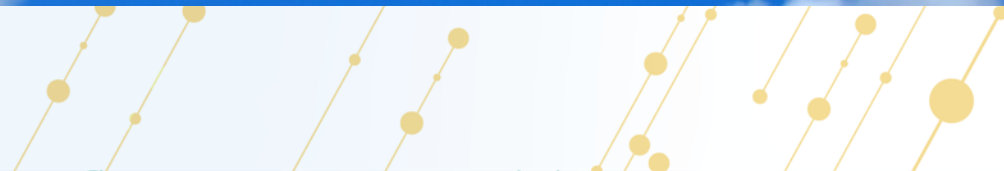


CHANGE IS CONSTANT



“ TO IMPROVE IS TO CHANGE,
SO TO BE PERFECT IS TO
HAVE CHANGED OFTEN.

WINSTON CHURCHILL



MAINTAINING COMPLIANCE

A LATE RUN UP
HEARTBREAK HILL



FLATTEN THE CURVE

“ LET OUR ADVANCE WORRYING BECOME
ADVANCE THINKING AND PLANNING.

WINSTON CHURCHILL

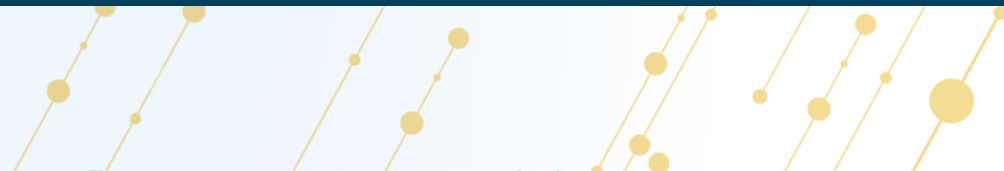


ENFORCEMENT OF COMPLIANCE



- Business and cyber leaders support effective **enforcement of regulatory requirements.**
- 76% of business leaders and 70% of cyber leaders agreed that further enforcement would lead to an increase in their organizations' cyber resilience.

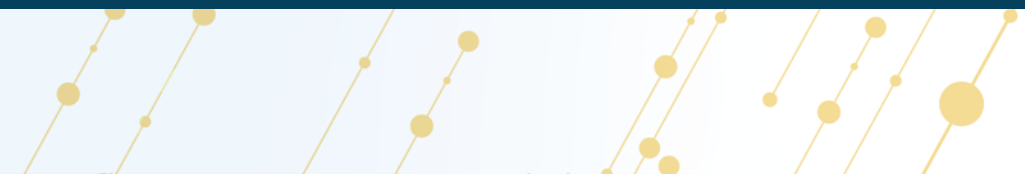
**World Economic Forum Global
Cybersecurity Outlook Report 2023**



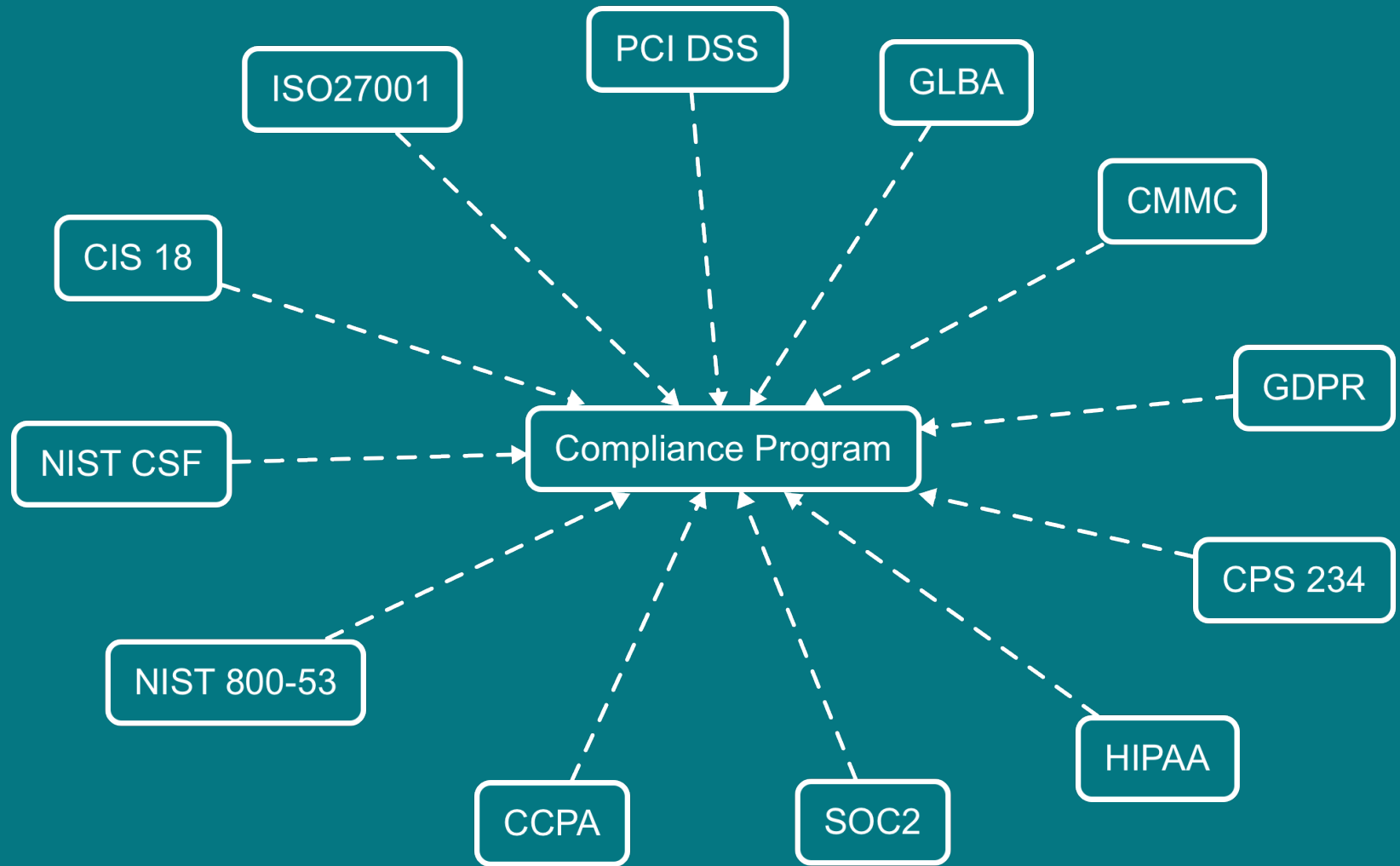
THE SEEDS FOR ENFORCEMENT



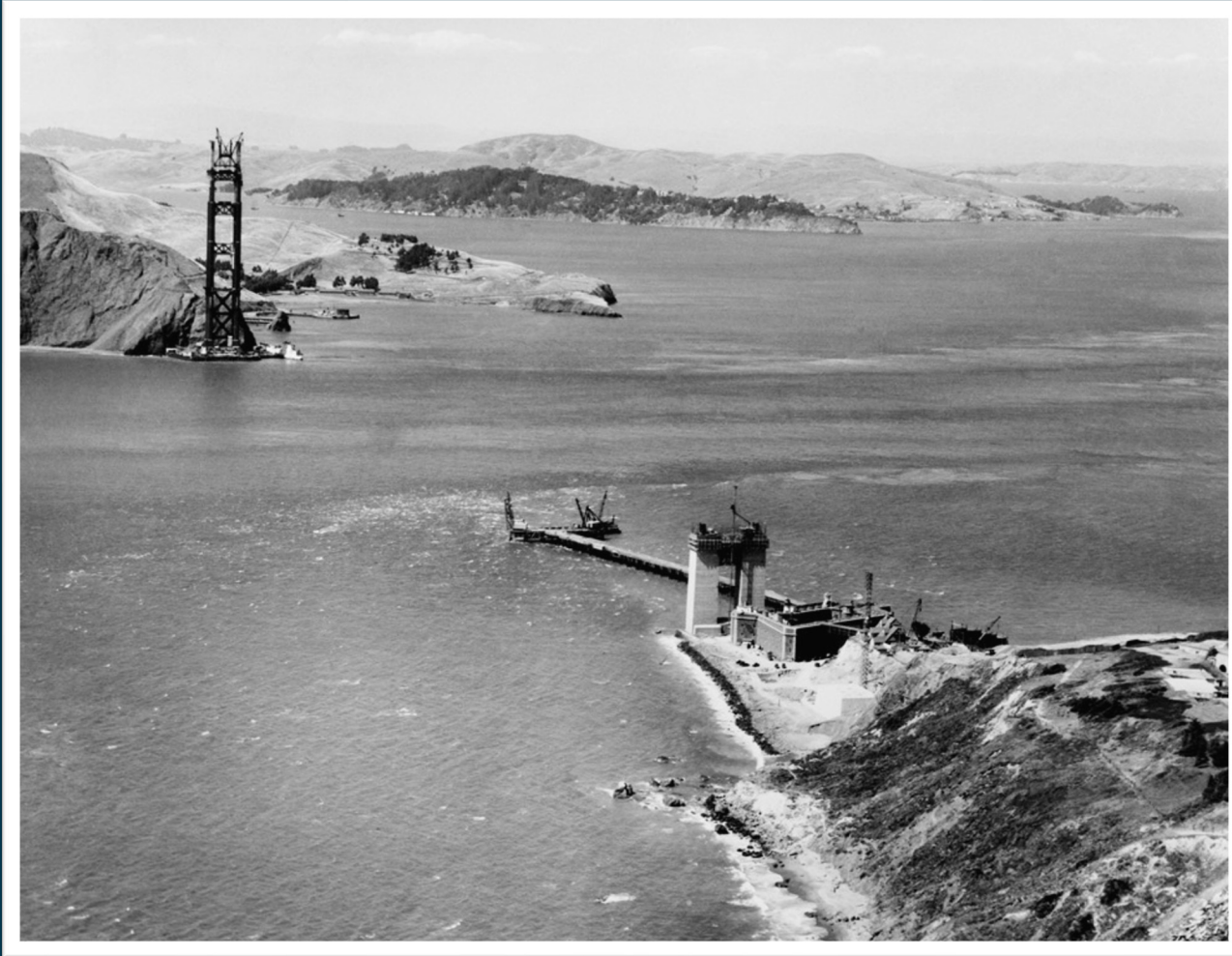
- The Federal Trade Commission sued a hotel chain and its subsidiaries in 2012.
- The company had to protect cardholder data and conduct related information security audits annually for the next 20 years.
- The Court of Appeals affirmed the FTC's right to challenge unreasonable data security practices.
- Regulatory authorities have been “growing teeth” for some time now.



WHAT MAKES UP YOUR PROGRAM?

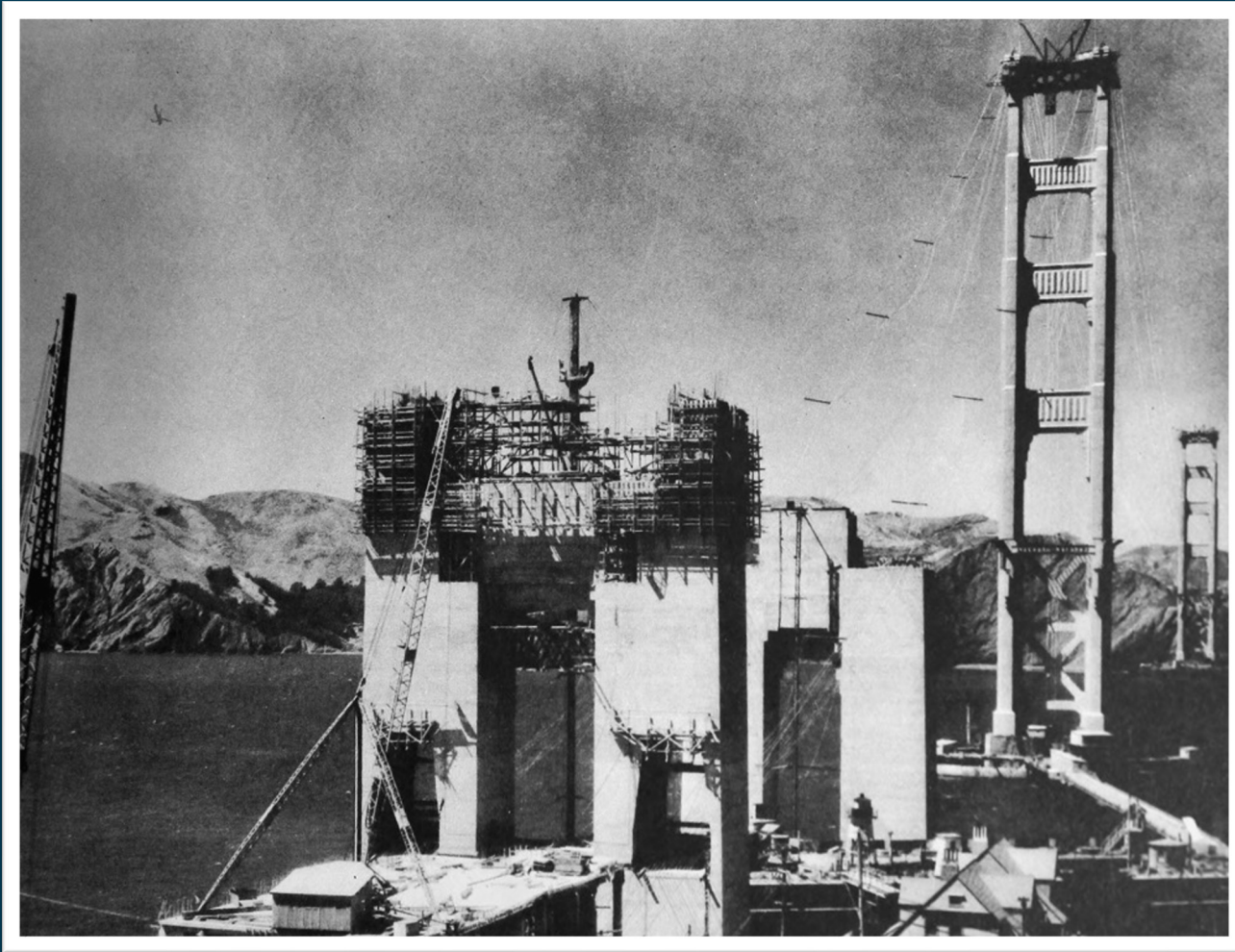


PROGRAM MATURITY – INITIAL/MINIMAL



Processes are disorganized and success is likely to depend on individual efforts.

PROGRAM MATURITY – REPEATABLE

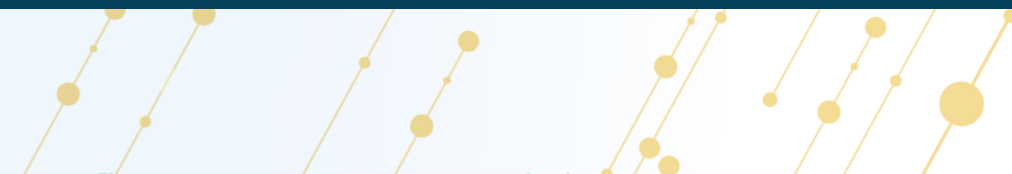


Basic project management techniques are established, and successes could be repeated. Still often reactive.

PROGRAM MATURITY – DEFINED



Organization has developed its own standard process through attention to documentation, standardization, and integration.



PROGRAM MATURITY – MANAGED

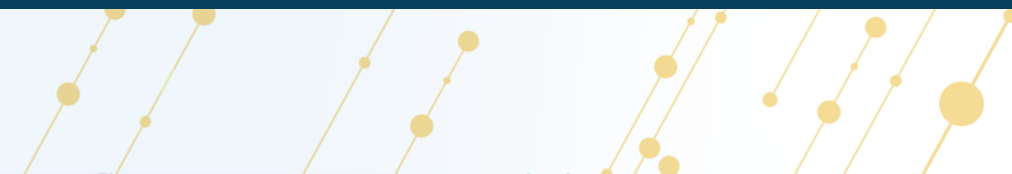


An organization monitors and controls its own processes through data collection and analysis.

PROGRAM MATURITY – OPTIMIZED



Processes are constantly being improved through monitoring feedback from current processes.



IMPEDIMENTS TO SUCCESS



- Lack of leadership support.
- Running multiple compliance streams independent of each other.
- Weak communications and staff education.
- Insufficient resources.
- Viewing compliance as a point in time activity.
- Allowing broad or ongoing exceptions.
- Lack of tools to facilitate compliance.
- Not planning for changes in standards.

MAINTAIN SUCCESS



THANK YOU



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