



 *10th Anniversary*
Keynote Presentation

ISE Southeast Executive Forum and Awards March 13, 2012

Company Name: Epsilon
Project Name: Simplified Method for Risk Management
Presenter: Chris Ray
Presenter Title: Chief Information Security Officer





TEN
TECH EXEC NETWORKS

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Company Overview



epsilon.

- Industry's leading provider of multi-channel, data-driven marketing technologies and services
- World's largest global permission-based email provider
- Over 3,000 employees worldwide
- Revenue: < \$1 Billion
- Epsilon is an Alliance Data Company (NYSE: ADS)
- Work with over 2,000 global clients, including 26 of the Fortune 100
- We give clients the ability to send more than 15 million dynamic messages in one hour, or more than 40 billion emails a year





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Agenda

- Today's CISO
- Technology Changes
- Keeping Up with Risk
- Approach Taken
- Benefits / Lessons Learned



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Today's CISO

- Great profession and great opportunity
- Expected to be a subject matter expert in all areas
- Tends to fight fires more than be strategic
- Get more and more “opportunities” without budget
- Has to still avoid being a roadblock or being someone who “doesn’t understand the business”

Vision without Action is a Daydream. Action without Vision is a Nightmare, but...

Vision without Budget is Disillusionment.





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Technology Changes

- Information available anytime, anywhere, and faster
- Product time to market is greatly increased
- Mobile, social media, big data
- A lot more of “do it yourself” with technology
 - IT being labeled as “Slow and No”
 - Gartner – By 2015, 35% of enterprise IT expenditures for most organizations will be managed outside of IT...”

Twitter adds 12 TB of data every day – How do you manage data content?

ISE® Southeast Executive Forum and Awards 2012 - Nominee Showcase Presentation



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Keeping Up with Risk

- Goal: Help identify, measure, track, and mitigate risks to company projects and initiatives
- Before:
 - Random identification of issues
 - Inconsistent processes / questions
 - Depended on whether you were invited to a meeting – and certainly whether you were invited back
 - Very reactive, chaotic, and lacked management visibility



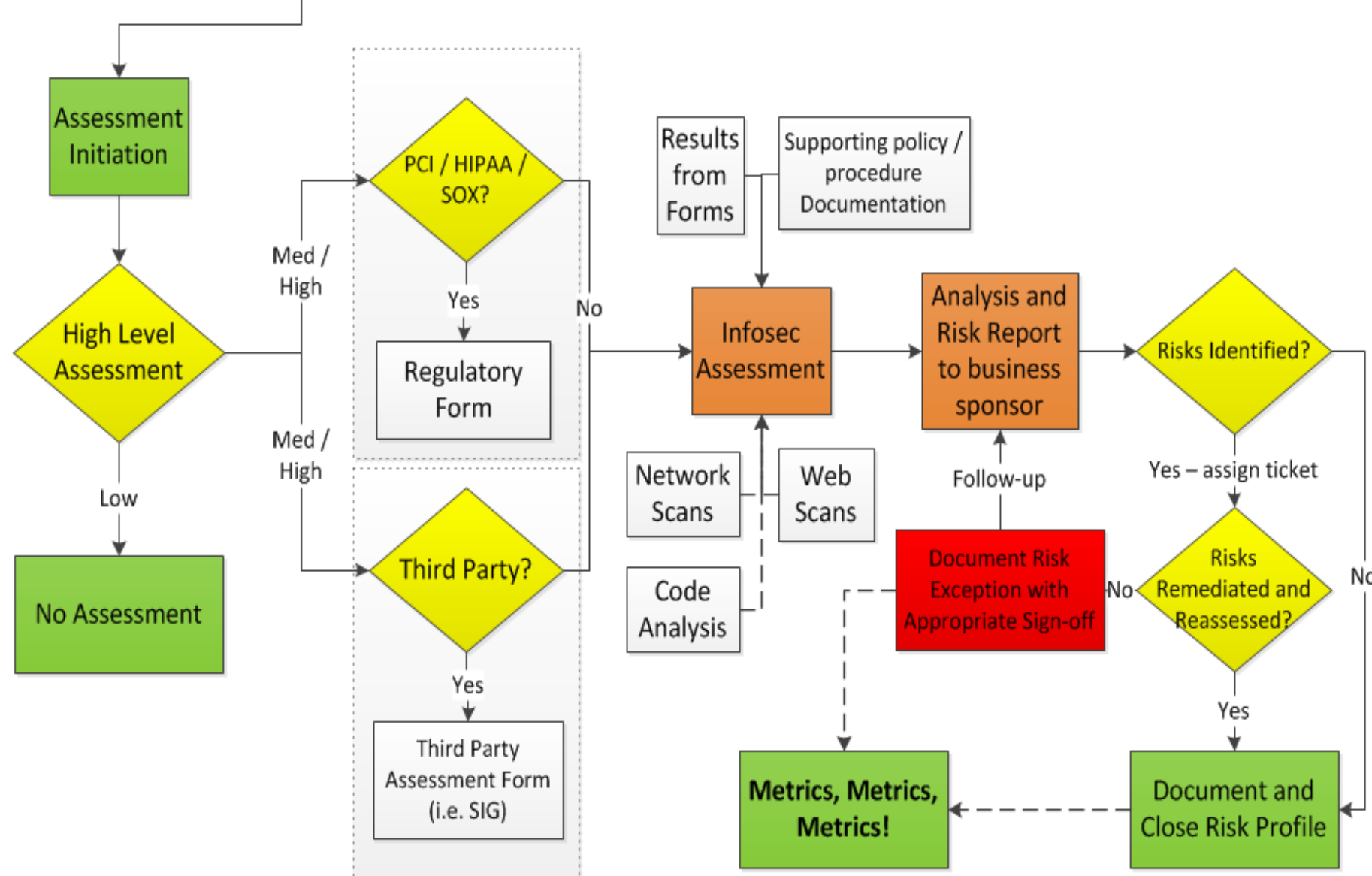
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Approach Taken

- Develop “lightweight” 5-10 question questionnaire
- Weighted factors on answers provided
 - i.e. “Yes” to regulatory impact had a higher weighting
 - Other factors: Number of users; Internet facing; business partner connectivity; internal vs external user; etc
- “High” impact routed to Infosec for deeper dive based on question responses
- Used basic Sharepoint site with some workflow

Input source for Risk Identification:

- Project Initiation (SDLC)
- New Vendor Contract (Vendor Management)
- New Equipment Being Added to Environment (Change Control)
- Random Notification (Hallway Conversation)





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Benefits

- Consistency – Standardized set of questions regardless of who participated
- Visibility – Allowed everyone to be involved
- Efficiency – Reduced time spent in meetings assessing non-critical efforts
- Accountability – Provided formal record of risk decisions – including sign-off by someone other than the CISO
- Customer Focus – Less rework which led to less time fixing things and more time building things...



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Lessons Learned/Best Practices

- Use a common framework / guideline
- Create a committee – Legal, HR, Audit, Privacy, Corp Affairs, Business Areas
- Market the program – publish metrics!
- Leverage existing tools / resources
 - BITS Shared Assessment Program (no longer free);
 - OWASP Testing Guide v3 and Cheat Sheets;
 - OpenFISMA – risk tracking tool (still free)



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OpenFISMA

This system is for *demonstration purposes only* and is made available to the public by [Endeavor Systems, Inc.](#) No sensitive data is hosted on this server.

This server is automatically refreshed periodically throughout the day, so any changes made will be lost when the server is refreshed. That last build was at: 2012-03-09 06:02:09

Your actions may be monitored on this system and there are no privacy guarantees made. Any misuse or abuse of this server will be investigated and prosecuted if possible.

Login information:
Username: sample
Password: Sample1
Please refrain from changing the password as it would affect other people's access demo.

Username:
Password:

 [Report A Security Incident](#)

Incident Details

What date did the incident occur?:























What time did the incident occur?: : :

In what timezone did the incident occur?:

What building did the incident occur in?:











What room did the incident occur in?:

Describe the incident:

B I U |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  | 

Path:

Describe what actions have already been taken:

B I U |  |  |  |  |  |  |  |  |  | 

Path:





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Don't be one of these guys!

Learn to speak to your business partners!

Build relationships with your peers!

Take advantage of social media for collaboration – if you're not using it, you're in denial!

And remember...

It Takes **Green (\$)** to Make **Green!**

