

# Cyber Risk Assessment

# Cyber Liability Questionnaire



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Prepared for: Your Customer / Prospect Prepared by: Your Company Name



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# **Type Of Sensitive Data**

# **Information Security Infrastructure And Organization**

Does your company have an information security infrastructure and organization? Attach organizational charts or policy and procedure documents indicating the establishment of an information security infrastructure and organization.

| Response<br>Yes                 |                 |  |  |
|---------------------------------|-----------------|--|--|
| Responded By<br>Bruce Banner    |                 |  |  |
| Attached Images                 |                 |  |  |
| Kaplan Dental Firewall Internet |                 |  |  |
| Exhibits • KapDentallTIni       | rastructure.png |  |  |

### **Sensitive Data Checklist**

Do you collect, store, process and/or transmit any Sensitive Data on your computer system (check all that apply below)?

| Credit Card Information  |
|--|
| Healthcare Information   |
| Trade Secrets  |
| Customer Information (Names, Addresses, Email, Social Security Number) |
| Usernames and Passwords  |
| Money/Securities Information   |
| Intellectual Property Assets   |
| Employee/HR Information  |

| Responded By<br>Steve R   |
|---|
| Additional Notes Credit Card Information will be moved to different server in 2020. |
| Attached Images   |





### **Exhibits**

serverSensitiveContents.png

### **Total Number of Protected Records**

Total number of protected records in your care, custody, or control:

| <b>Re</b><br>99 | <b>esponse</b><br>90 |  |  |
|-----------------|----------------------|--|--|
|                 |                      |  |  |

# **Maximum Number of Unique Individuals**

Maximum number of unique individuals for whom you collect, store or process any personal information?

| Response<br>99 |  |  |  |
|----------------|--|--|--|
|                |  |  |  |

# **Regulatory Or Compliance Frameworks Checklist**

Is your company compliant with any of the following regulatory or compliance frameworks? (check all that apply and indicate most recent date of compliance)

| Regulatory or Compliance<br>Framework | Achieved Compliance | Most Recent Date of Compliance |
|---------------------------------------|---------------------|--------------------------------|
| ISO 17999                             |                     | 5/1/2019                       |
| SOX                                   |                     |                                |
| PCI-DSS                               |                     |                                |
| HITECH                                |                     |                                |
| HIPAA                                 |                     |                                |
| GLBA                                  |                     |                                |
| SSAE                                  |                     |                                |
| FISMA                                 |                     |                                |



# **Industry Security Frameworks**

| Does you   | r company  | leverage | any industry | security | frameworks | for | confidentiality, | integrity | and | availabili | ty |
|------------|------------|----------|--------------|----------|------------|-----|------------------|-----------|-----|------------|----|
| (e.g., NIS | T, COBIT)? | ?        |              |          |            |     |                  |           |     |            |    |

| Response<br>No  |   |  |  |  |  |
|---|---|--|--|--|--|
| Outside   | Security or Privacy Groups  |  |  |  |  |
| Is your comp  | pany an active member in outside security or privacy groups (e.g., ISAC, IAPP, ISACA)?  |  |  |  |  |
| <b>Response</b><br>No   |   |  |  |  |  |
| Is any Sensi  | e Data Processed  tive Data processed, stored, inputted, collected or otherwise handled on or in any of the sets under your control or authorization? |  |  |  |  |
|   | Websites  |  |  |  |  |
|   | Computer Systems  |  |  |  |  |
|   | Laptops, personal portable or mobile devices  |  |  |  |  |
|   | Physical files and premises   |  |  |  |  |
| Sensitive Information in Custody  Do you know what sensitive or private information is in your custody along with whose info it is, where it is, and how to contact those individuals if their information is breached?  Response |   |  |  |  |  |
| No  |   |  |  |  |  |
|   |   |  |  |  |  |

# **Total Global IT Budget Allocated to Security?**

What percentage of your total global IT budget is allocated to security?

| Response |  |  |
|----------|--|--|
| 10%      |  |  |
|          |  |  |



### **Third Parties**

# **Percentage of Work Subcontracted to Others**

What percentage of the Applicant's business involves subcontracting work to others?

| Attached Image         | es  |
|------------------------|---|
| <b>Response</b><br>Yes |   |
| Does the Applica       | ant use a written contract with clients? (Please attach copies of written contracts)                                      |
|                        | ntracts with Clients  |
| Exhibits • KapDen      | ntalErrorsAndOmissionsInsurance.docx  |
| Attached Image         | es  |
| <b>Response</b><br>Yes |   |
|                        | ant require evidence of the errors and omissions insurance from subcontractors? (Please evidence of errors and insurance) |
| Evidence o             | f Errors and Omissions Insurance from Subcontractors  |
| Response<br>10%        |   |

### **Contracts Review Prior to Use**

Does an attorney review such contracts prior to use?

CustomerContract.docx



### **Third Parties**

# **Percentage of Work Subcontracted to Others**

What percentage of the Applicant's business involves subcontracting work to others?

| Response 10%  |
|---|
|   |
| <b>Evidence of Errors and Omissions Insurance from Subcontractors</b>   |
| Does the Applicant require evidence of the errors and omissions insurance from subcontractors? (Please attach copies of evidence of errors and insurance) |
| Response<br>Yes   |
| Attached Images   |
|   |
| <ul> <li>Exhibits</li> <li>KapDentalErrorsAndOmissionsInsurance.docx</li> </ul>   |
|   |
| Written Contracts with Clients  |
| Does the Applicant use a written contract with clients? (Please attach copies of written contracts)   |
| Response<br>Yes   |
| Attached Images   |
|   |
| Exhibits  |

### **Contracts Review Prior to Use**

Does an attorney review such contracts prior to use?

CustomerContract.docx



|   | CATALYST<br>TECHNOLOGY GROUP      |
|---|-----------------------------------|
|   | Innovating how IT is delivered.sm |
| i |                                   |

Yes

### **Hold Harmless Clauses**

| Response |  |  |  |
|----------|--|--|--|
| Yes      |  |  |  |

# **Consent to Hold Harmless/Indemnify Others**

Does the Applicant agree to hold harmless/indemnify others?

| Response<br>Yes |  |  |
|-----------------|--|--|
|                 |  |  |

# **Company Information Responsible Individual**

Is there an individual responsible for the security of the company information that resides at third party technology service providers?

| <b>Response</b><br>Yes |  |  |  |
|------------------------|--|--|--|
|                        |  |  |  |

### Follow-up: Company Information Responsible Individual **Responsible Individual**

Enter the name of the responsible individual:

| Response<br>Steve Rogers |  |  |
|--------------------------|--|--|
|                          |  |  |

# **Payment Processing**

Do you process payments on behalf of others, including eCommerce transactions?

| Response<br>Yes |  |  |
|-----------------|--|--|
|                 |  |  |



### **Protected Personal Information or Protected Healthcare Information**

Do you collect, input, store, process, or maintain any Protected Personal Information or Protected Healthcare Information Records for third party corporate entities?

| Response<br>Yes  |
|--|
| Third Down Compared Confidential Information   |
| Third Party Corporate Confidential Information   |
| Do you store, process or maintain any third party corporate confidential information?  |
| Response<br>Yes  |
| Information Sharing  |
| Does the Applicant share private or personal information gathered from customers (by the Applicant or others) with third parties?                            |
| Response<br>Yes  |
| Information Security Staff   |
| Do you outsource your information security to a firm specializing in information security or have staff responsible for and trained in information security? |
| Response<br>Yes  |
|  |
| Follow-up: Information Security Staff List of Information Security Staff   |
| Enter the name of firm or staff member(s):   |
| Response<br>Compu-Global-Hyper-Mega-Net  |

# **Network, Computer System, Information Security Outsourcing**



| Do you outsource any part of your   | network, computer syste  | em or information security functions?            |
|---|--------------------------|--|
| Response<br>Yes   |                          |  |
| Follow-up: Network, Computer S Outsourced Security S  |                          | curity Outsourcing                               |
| Indicate which services are being   | provided and the vendor  | s name:  |
| Service   | Outsourced               | Vendor Name                                      |
| Data Center Hosting   |                          | Compu-Global-Hyper-Mega-Net                      |
| Managed Security  |                          |  |
| Data Processing   |                          |  |
| Application Service Provider  |                          |  |
| Alert Log Monitoring  |                          |  |
| Offsite Backup and Storage  |                          |  |
| Does the Applicant currently use a  Response Yes  | a Cloud Service Provider | in the course of business operations?            |
|   |                          |  |
| Follow-up: Cloud Service Provide List of Cloud Service Full List all Cloud Service Providers. |                          |  |
| Response<br>SHIELD  |                          |  |
| Do you require third paregulatory requirement   |                          | providers meet required<br>5, HIPAA, SOX, etc.)? |



# **Third Party Security Provisions**

Do third party contracts include security provisions? Attach contracts or portions related to security provisions.

| Response<br>Yes   |
|---|
| Attached Images   |
| Exhibits  • KapDentalSecurityProvisions.docx  |
| Third Party Security Standards  |
| Does your company enforce security standards for third parties that connect to your network?  |
| Response<br>Yes   |
| Third Party Security Assessments or Audits  |
| Does your company perform assessments or audits to ensure third party technology providers meet company security requirements?  |
| Response<br>No  |
| Contract Review and Approval Process  |
| Does your company have a formal process for reviewing and approving contracts with third party technology service providers? Please attach appropriate documentation. |
| Response<br>Yes   |

# **Sensitive or Confidential Information Written Agreements**

Do you enter into written agreement for such third-party services that address care, use, and control of sensitive or confidential information?



No

Yes

# **Hold Harmless and Indemnification Agreements**

Do contracts with service providers include hold harmless and indemnification agreements? Attach agreements or relevant sections.

| Yes  |
|--|
| Attached Images  |
| Exhibits  • KapDentalHoldHarmlessContracts.docx  |
| Data Protection Reviews  |
| Does the company perform reviews at least annually of the company's third-party service providers to ensure they adhere to company requirements for data protection? |
| Response<br>No   |
| Vendor Liability Insurance   |
| Does your company require all vendors to maintain liability insurance? Attach Policy and Procedures and indicate relevant section in notes.                          |
| Response   |

# **Evidence of Network Security and Privacy Liability Coverage**

Do you require third parties to provide evidence of network security and privacy liability coverage? If yes, please note where those records are kept.

| Response |                        |                        |                        |
|----------|------------------------|------------------------|------------------------|
| Yes      |                        |                        |                        |
|          |                        |                        |                        |
|          | <b>Response</b><br>Yes | <b>Response</b><br>Yes | <b>Response</b><br>Yes |



# **Computer Service Provider Security Policies and Procedures**

Do you require computer service providers who may have access to confidential information or PII to demonstrate adequate security policies and procedures?

| demonstrate adequate security policies and procedures?   |
|--|
| Response<br>No   |
|  |
| Healthcare Information Exchanges   |
| If the Applicant is in the healthcare industry, does the Applicant host, operate or manage a Healthcare Information Exchange on which other organizations may store PHI?                                   |
| Response Applicant does not operate or manage a Healthcare Information Exchange  |
|  |
| Vendor Data Security   |
| Do you require all vendors to whom you outsource data processing or hosting functions (e.g., data backup, application service providers, etc.) to demonstrate adequate security of their computer systems? |
| Response<br>Yes  |
| Follow-up: Vendor Data Security Method of Verification   |
| Please indicate method of verification:  |
| Response Security is assessed by internal staff  |
| Third Party Audit or Monitoring  |
| Have the Applicant's internal networks and/or Computer Systems been subject to third party audit or monitoring?  |
| Response<br>Yes  |



Follow-up: Third Party Audit or Monitoring

# Date of Last Audit and List of Improvements and Recommendations

When was the last audit? Attach list of improvements and recommendations.

| Response 4/30/19                       |  |  |
|--|--|--|
| Attached Images                        |  |  |
| Exhibits  • KapDentalImprovements.docx |  |  |

Follow-up: Third Party Audit or Monitoring

### **Improvements and Recommendations Implementation**

Have all improvements and recommendations been implemented? Attach relevant documentation.

| Response  |  |
|---|--|
| Yes   |  |
|   |  |
| Attached Images   |  |
|   |  |
|   |  |
| F. Milita   |  |
| Exhibits  |  |
| <ul> <li>KapDentalImprovementsCompleted.docx</li> </ul> |  |
|   |  |



# **Handling of Data**

| Sensitive Data Management Process   |
|---|
| Do you have a process to manage access to Sensitive Data including timely account termination?  |
| Response<br>Yes   |
| Follow-up: Sensitive Data Management Process Sensitive Data Management Process Details  |
| Please describe:  |
| Response Erase terminated employee accounts completely.   |
|   |
| Former Employee Associated Computer Access Termination  |
| Is all associated computer access terminated when an employee leaves the company?   |
| Response<br>Yes   |
|   |
| User Account Processes  |
| Does the company have processes established that ensure the proper addition, deletion and modification of user accounts and associated access rights? |
| Response<br>Yes   |
|   |
| User Account Management Process   |
| Does your company have a process for managing user accounts?  |
| Response<br>Yes   |
|   |



### **Firewall**

|     |          | , | 0,7 |
|-----|----------|---|-----|
|     |          |   |     |
|     |          |   |     |
| 1   | i e      |   |     |
| ۱   |          |   |     |
| -   | Response |   |     |
| -   | response |   |     |
| -   |          |   |     |
| -   | Yes      |   |     |
| - 1 | 103      |   |     |

Follow-up: Firewall Firewall Vendor

Which firewall vendor is used?

**Response** ZoneAlarm

Follow-up: Firewall

### **Firewall Update Procedure**

What is the current procedure for updating the firewall?

Does the Applicant have up-to-date, active firewall technology?

Response

Steve updates it daily.

### **Anti-virus**

Does the Applicant currently have in place updated anti-virus software active?

**Response** Yes

### **Anti-virus Installation**

Is anti-virus installed on all of the Applicant's computer systems, including laptops, personal computers and networks?

Response Yes

# **External Computer System Intrusion Prevention**



Do your external computer systems (e.g., commercial websites and mobile devices) use firewall and intrusion prevention systems?

| Response<br>Yes   |
|---|
|   |
| Follow-up: External Computer System Intrusion Prevention Intrusion Prevention Security Technologies                       |
| Please identify the security technologies used:   |
| Response<br>ZoneAlarm   |
|   |
| Password Management Process   |
| Does your company enforce a password management process?  |
| Response  |
|   |
| Password Complexity   |
| Does the company enforce passwords that are at least seven characters and contain both numeric and alphabetic characters? |
| Response<br>Yes   |
|   |
| Password Expiration   |
| Are procedures in place regarding the creation and periodic updating of passwords?  |
| Response<br>Yes   |
|   |

### **User and Password Procedure Documentation**

Does the Applicant have a formal documented user and password procedure in place? Attach documentation.

Response



Yes

### **Multi-Factor Login**

Does Applicant currently have in place Multi-Factor login for privileged access? Attach documentation or screenshots.

Response Yes

### **Critical System Security Testing**

Do critical systems receive full security testing before deployment? Attach proof of latest tests.

| Response<br>Yes |  |  |  |
|-----------------|--|--|--|
|                 |  |  |  |

# **System Security Considerations**

When a new system is developed or purchased, are security considerations taken into account? Attach relevant procedures document.

Response Yes

# **Production Security Review**

Are new applications and non-cosmetic changes reviewed for security vulnerabilities prior to migration to production? Attach relevant procedures document.

| Response |  |  |
|----------|--|--|
| Yes      |  |  |
|          |  |  |

# **Separation of Development Systems**

Are staging, test, and development systems kept separate from production systems? Attach network diagram indicating the separation of staging, test, development, and production systems.

| Response<br>Yes |  |
|-----------------|--|
|                 |  |



### **Technical Security Configuration Documentation**

Is there technical security configuration documentation for the technologies or major business applications in your company?

| Response<br>Yes |  |  |  |
|-----------------|--|--|--|
|                 |  |  |  |

# Follow-up: Technical Security Configuration Documentation Technical Security Configuration Documentation Location

Where is the documentation stored?

| Response             |
|----------------------|
| C:\ on main computer |
|                      |

### **Security Products**

Does your computer system (including e-mail and remote access) use security products that address viruses, worms, Trojans and other malware?

| Response |  |  |
|----------|--|--|
| Yes      |  |  |
|          |  |  |

# Follow-up: Security Products Security Products Used

Please identify the technologies used:

# Response GFI Languard GFI Software VIPRE Microsoft Security Essentials Symantec AntiVirus VIPRE

Windows Defender

# **Virus Controls and Filtering**

Do you implement virus controls and filtering on all systems?





| Response |
|----------|
| Yes      |

### **Anti-virus and Firewall Updates**

Do you have anti-virus software and firewalls in place that are regularly updated (at least quarterly)?

| Response |  |  |  |
|----------|--|--|--|
| Yes      |  |  |  |
|          |  |  |  |

### **Anti-malware**

Does the company install and update an anti-malware solution on all systems commonly affected by malicious software (particularly personal computers and servers)?

| Response |  |
|----------|--|
| Yes      |  |
|          |  |

### **Retired Software or Hardware**

Does the company use any software or hardware that has been officially retired (i.e., considered 'end- oflife') by the manufacturer (e.g., Windows XP)?

| Response<br>Yes |  |
|-----------------|--|
|-----------------|--|

### **Critical Patches**

Are critical patches installed within thirty (30) days of release?

| Response<br>Yes |  |  |  |
|-----------------|--|--|--|
|                 |  |  |  |

# **Physical Security**

Do you have physical security program in place to prohibit and track unauthorized access to your computer system and data center?

| Response<br>Yes |  |  |  |
|-----------------|--|--|--|
|                 |  |  |  |



Follow-up: Physical Security

### **Physical Security Program Details**

Please describe the physical security program. Attach additional documentation if available.

| Response  |
|---|
| We have security guards at every entrance and exit.   |
| Attached Images   |
| Exhibits  • KapDentalSecurityGuardFloorPlan.docx  |
| Automated Patch Management  |
| Do you have an automated patch management program?  |
| Response<br>Yes   |
| Unauthorized Access   |
| Do you have a way to detect unauthorized access or attempts to access sensitive information?    |
| Response<br>Yes   |
| Follow-up: Unauthorized Access Unauthorized Access Detection Details                            |
| Please describe how you detect unauthorized access or attempts to access sensitive information. |
| Response Steve checks logs daily  |

### **Intrusion Detection**

Does the company have an intrusion detection solution that detects and alerts an individual or group responsible for reviewing malicious activity on the company network?



| Response |  |
|----------|--|
| Yes      |  |

Follow-up: Intrusion Detection

### **Intrusion Detection Software**

What intrusion detection software are you using?

### Response

McAfee

### **Security Software Upgrades**

Describe the process for upgrading security software (i.e. how often and by whom):

### Response

Steve updates it every day.

### **Physical Access**

Does the company have entry controls that limit and monitor physical access to company facilities (e.g., offices, data centers, etc.)? Attach photos of entry controls.

### Response

Yes

### **Attached Images**



### **Exhibits**

KapDentalSecurityPlan.png

# **Network Changes**

Do you control and track all changes to your network to ensure that it remains secure?

### Response

Yes



# Follow-up: Network Changes Network Change Tracking

How are changes tracked?

| Response          |
|-------------------|
| Steve keeps logs. |

### **Network Security Controls**

Do you have a procedure to test or audit network security controls?

| Response |  |
|----------|--|
| Yes      |  |
|          |  |

# Follow-up: Network Security Controls Network Security Controls Details

Please describe. Attach additional documents if available.

Response

Attached Images

Exhibits

Network Security Controls Details.docx

# **Internet/DMZ Systems**

Are systems in your Internet/DMZ environment secured?

| Response<br>Yes |  |  |  |
|-----------------|--|--|--|
|                 |  |  |  |

### **Internal Systems**

Are internal systems secured?



|    | E  | C  | н  | Z  | 0 | L | 0  | G   | Y | G    | R  | 0   | П   | P  | _                |
|----|----|----|----|----|---|---|----|-----|---|------|----|-----|-----|----|------------------|
| In | ne | οv | at | in | g | h | οv | v I | Т | is c | de | liν | /ei | re | d. <sup>sm</sup> |
|    |    |    |    |    | _ |   |    |     |   |      |    |     |     |    |                  |
|    |    |    |    |    |   |   |    |     |   |      |    |     |     |    |                  |

| Res | po | ns | e |
|-----|----|----|---|
| \ / |    |    |   |

Yes

### **Network Access Controls**

| Are | controls | in | place | to | secure | network | access? |
|-----|----------|----|-------|----|--------|---------|---------|
|-----|----------|----|-------|----|--------|---------|---------|

### Response Yes

Follow-up: Network Access Controls

### **Network Access Controls Details**

Please describe. Attach additional documents if available.

|     | sponse<br>docx                               |
|-----|--|
| Att | ached Images                                 |
|     |  |
| Exi | nibits  Network Access Controls Details.docx |

# **Open Source Software Updates**

Does the company update open source software (e.g., Java, Linux, PHP, Python, OpenSSL) that is not commercially supported for known security vulnerabilities?

| <b>Resp</b><br>Yes | onse |  |  |  |
|--------------------|------|--|--|--|
|                    |      |  |  |  |

Follow-up: Open Source Software Updates

# **Open Source Software Updates Details**

Please describe. Attach additional documents if available.

| Response<br>see docx |  |  |  |
|----------------------|--|--|--|
| Attached Images      |  |  |  |



| CTBER RISK ASSESSIVIENT  |
|--|
|  |
|  |
| Open Source Software Updates Details.docx  |
|  |
| Factory Default Settings   |
| Do you replace factory default settings to ensure your information security systems are securely configured?   |
| Response<br>Yes  |
| Vulnerability Assessment   |
| Do you have a proactive vulnerability assessment program that monitors for breaches and ensures timely updates of anti-virus signatures and critical security patches? |
| Response<br>Yes  |
| Virus Signatures   |
| How often are virus signatures updated?  |
| Response daily   |
|  |
| Patch Management Procedures  |
| Does the Applicant currently have in place patch management procedures?  |
| Response<br>Yes  |
|  |

# **Commercial Software Updates**

Does the company update (e.g., patch, upgrade) commercial software for known security vulnerabilities per the manufacturer advice?



| Res | p | 0 | n | S | e |
|-----|---|---|---|---|---|
|-----|---|---|---|---|---|

Yes

### **Multi-Factor Authentication**

Does the company use multi-factor authentication for remote network access originating from outside the company network by employees and third parties (e.g., VPN, remote desktop)?

| Response<br>Yes  |
|--|
| Follow-up: Multi-Factor Authentication Multi-Factor Authentication Details |
| Multi-Factor Authentication Details  |
| Please describe. Attach additional documents if available.                 |
| Response email and phone number verification                               |
| Attached Images  |
| Exhibits  • Multi-Factor Authentication Details.docx                       |
| Remote Access  |
| Does the Applicant currently have in place remote access limited to VPN?   |
| Response<br>Yes  |
|  |

### Mobile Device Unauthorized Access

Does the company have a solution to protect mobile devices (e.g., Laptops, iPhones, iPads, Android, Tablets) to prevent unauthorized access in the event the device is lost or stolen?

| Response |  |  |
|----------|--|--|
| Yes      |  |  |
|          |  |  |



Follow-up: Mobile Device Unauthorized Access

### **Mobile Device Unauthorized Access Solution Details**

Please describe. Attach additional documents if available.

| Response we erase them remotely   |
|---|
| Attached Images   |
| Exhibits  • Mobile Device Unauthorized Access Solution Details.docx   |
| Laptop or Web Server Sensitive Data   |
| Does the Applicant store sensitive data on laptops or web servers?  |
| Response<br>Yes   |
| Follow-up: Laptop or Web Server Sensitive Data  Laptop or Web Server Sensitive Data Encryption  |
| Is the data encrypted?  |
| Response<br>Yes   |
| Encryption Tools  |
| Do you have encryption tools to ensure integrity and confidentiality of Sensitive Data including data on removable media (e.g., CDs, DVD, tapes, disk drives, USB devices etc.)? If 'Yes', please describe technologies used: |
| Response<br>Yes   |
|   |

Follow-up: Encryption Tools

# **Encryption Tools Details**

Please describe technologies used. Attach additional documents if available.



| Response<br>see docx   |   |
|--|---|
| Attached Images  |   |
| Exhibits • Encryption Tools Details.doo                                    | cx  |
| List of Encrypted Privac   | y Information   |
| Does your company encrypt Privacy  | Information when: (Check all that apply)                                    |
|  |   |
| Data is at rest  |   |
|  | etworks (e.g. the Internet), in transit                                     |
|  | (e.g. laptops, phones, tablets, flash drives)                               |
| Stored on enterprise asse  | ets (e.g. databases, file shares, backups)                                  |
| Stored with 3rd party serv   | rices (e.g. cloud)  |
| Portable Data Storage  Are users able to store data to the had USB drives? | ard drive of portable computers or portable media devices such as           |
| Response<br>Yes  |   |
| Portable Data Storage S  Describe any additional controls the devices:     | <b>ecurity</b> Applicant has implemented to protect data stored on portable |
| Response Remote data deletion  |   |

# **Portable Data Storage Encryption**

Are tapes and other portable media containing backup materials encrypted?



| LAIALY SI                        |
|----------------------------------|
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| Response |
|----------|
| Yes      |

### Offsite Portable Data Storage Secure Transportation and Facilities

| Are tapes or other portable media stored of | offsite using secured | d transportation and secured facili | ities? |
|---|-----------------------|-------------------------------------|--------|
|---|-----------------------|-------------------------------------|--------|

| Response<br>Yes |
|-----------------|
|-----------------|

# Offsite Portable Data Storage Transportation Logs

If stored offsite, are transportation logs maintained?

| Response<br>Yes |  |  |
|-----------------|--|--|
|                 |  |  |

# **Onsite Portable Data Storage Physical Security Controls**

If stored onsite, please describe physical security controls

| Response |  |  |
|----------|--|--|
| Yes      |  |  |
|          |  |  |

# **Remote Access Encryption**

Do you authenticate and encrypt all remote access to your network and require all such access to be from systems at least as secure as your own? Check N/A if you do not allow remote access to your systems.

| Response<br>Yes |  |
|-----------------|--|
|-----------------|--|

# **Wireless Network Security**

On your wireless networks, do you use security at least as strong as WPA authentication and encryption? Check N/A if you do not use wireless networks.

| Response |  |  |
|----------|--|--|
| Yes      |  |  |
|          |  |  |



### **External Network Privacy Information Security**

Does your company store Privacy Information on a secure network zone that is segmented from internal network?

| Response<br>Yes                                       |  |
|---|--|
| Configuration Management                              |  |
|   |  |
| Does your company perform configuration management?   |  |
| Response<br>Yes                                       |  |
|   |  |
| System Logs   |  |
| Do you maintain system logs?                          |  |
| Response<br>Yes                                       |  |
| System Log Security Review                            |  |
| Are system logs reviewed for security related events? |  |
| Response<br>Yes                                       |  |
|   |  |
| System Log Review Frequency                           |  |
| Are system logs reviewed daily, weekly, monthly?      |  |
| Response  |  |

# **Network Change Tracking**

Daily

Do you control and track all changes to your network to ensure that it remains secure?



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|--|-----------------------|
| Response<br>Yes  |                       |
|  |                       |
| Credit Card Transactions   |                       |
| Do you process, store, or handle credit card transactions?               |                       |
| Response<br>Yes  |                       |
| Follow-up: Credit Card Transactions PCI DSS Compliance                   |                       |
| Are you compliant with Payment Card Industry Data Security Standards (PC | I DSS)?               |
| Response<br>Yes  |                       |
| Website Sensitive Data   |                       |
| Do your Websites use Sensitive Data?                                     |                       |
| Response<br>Yes  |                       |
| Follow-up: Website Sensitive Data PCI DSS Compliance                     |                       |
| Are you compliant with Payment Card Industry Data Security Standards (PC | I DSS)?               |
| Response<br>Yes  |                       |
| Follow-up: PCI DSS Compliance Evidence of PCI DSS Compliance             |                       |
| Were you found to be in compliance? Upload latest findings.              |                       |

Response Yes



### **Attached Images**

### **Exhibits**

• Evidence of PCI DSS Compliance.docx



# **Policies, Procedures and Documentation**

#### **Policies and Procedures Implementation**

Do you implement policies and procedures to ensure compliance with legislative, regulatory and/or contractual privacy requirements that govern your industry?

| contractual privacy requirements that govern your industry?  |
|--|
| Response<br>Yes  |
| Risk Management Procedures   |
| Does the Applicant have any risk management procedures in place (please attach a copy of procedures)?                    |
| Response<br>Yes  |
| Privacy Information Storage and Transmission Documentation   |
| Does the company maintain documentation that clearly identifies the storage and transmission of all Privacy Information? |
| Response<br>Yes  |
| Third Party Information Sharing Privacy Policy   |
| Does your privacy policy allow you to share information with third parties?  |
| Response<br>Yes  |
| Follow-up: Third Party Information Sharing Privacy Policy  |

Follow-up: Third Party Information Sharing Privacy Policy **Vendor Contracts** 

Do your contracts with vendors and others with whom you share or store Sensitive Data require the other party to defend and indemnify you for legal liability arising from any release or disclosure of the information due to the negligence of the vendor or other party?

Response



Yes

#### **Business Continuity Plan and Disaster Recovery Plan**

Does your organization have a Business Continuity (BCP) and Disaster Recovery (DR) plan?

| Response |  |  |  |
|----------|--|--|--|
| Yes      |  |  |  |
|          |  |  |  |

#### **Business Continuity/Disaster Recovery Plan Testing**

Was your Business Continuity/Disaster Recovery Plan tested during the past year or how often is it tested?

| Response<br>Yes |  |  |
|-----------------|--|--|
|                 |  |  |

#### **Expected Downtime for Critical Business Systems**

What is the greatest expected downtime (in hours) for critical business systems?

| response<br>hr |
|----------------|
| hr             |
|                |

#### **Operations Restoration Time**

How long does it take to restore your operations after a computer attack or other loss/corruption of data?

| Response       |
|----------------|
| 12 hrs or less |
|                |

#### **Security Incident Response Plan**

Do you have a security incident response plan in case of a security breach?

| Response |  |
|----------|--|
| Yes      |  |
|          |  |

Follow-up: Security Incident Response Plan



#### **Security Incident Response Plan Alternative Options**

Does your security incident response plan include alternative options to account for incapacitated third-party outsourcing providers which you depend on?

| Response<br>Yes   |
|---|
| Follow-up: Security Incident Response Plan Alternative Options Security Incident Response Plan Alternative Option Details  If "Yes," explain: |
| Response We have backup servers.  |
| Company Property Security and Acceptable Use Policy   |
| Do you have a company policy governing security and acceptable use of company property?   |
| Response<br>Yes   |
| Computer Use Policies   |
| Does the Applicant have computer use policies?  |
| Response<br>Yes   |
| Computer Security Policy  |
| Does the Applicant have a computer security policy?   |
| Response<br>Yes   |

## **Laptop Security Policy**

Does the Applicant maintain a laptop security policy?



Yes

## **Information Security Policy and Privacy Policy**

Do you have a comprehensive Information Security Policy and Privacy Policy that is updated and enforced on continual basis? Attach a copy of the privacy policy.

| Response   |
|--|
| Yes  |
| Attached Images  |
| INFORMATION, SECURITY AND QUALITY  AND ADDRESS OF THE PROPERTY |
| Exhibits  • privacyPolicy.png  |
| Follow-up: Information Security Policy and Privacy Policy Privacy Policy Review  |
| Has your Privacy Policy been reviewed by a qualified attorney?   |
| Response<br>Yes  |
| Follow-up: Privacy Policy Review Privacy Policy Review Attorney Name   |
| Enter the name of the qualified attorney:  |
| Response<br>Bruce Wayne  |
| Privacy Policy Compliance  |
| Is the Applicant in compliance with its privacy policy?  |
| Response<br>Yes  |



## **Privacy Policy Author**

| Who developed the p | orivacy policy? Internally ( | developed or third party? |
|---------------------|------------------------------|---------------------------|
|---------------------|------------------------------|---------------------------|

| The developed are privately transferred or arms party.                                   |
|--|
| Response<br>Third Party  |
|  |
| Follow-up: Privacy Policy Author Privacy Policy Third Party Author                       |
| Name of third party:   |
| Response<br>Scott Lang   |
|  |
| Privacy Policy Last Review Date  |
| When was the company's privacy policy last reviewed?                                     |
| Response 4/29/19   |
|  |
| Privacy Policy Review and Update Frequency   |
| How often is it reviewed and updated?  |
| Response<br>Monthly  |
|  |
| Identity Theft Prevention Program  |
| Have you implemented an identity theft prevention program (aka FTC "Red Flags" program)? |
| Response<br>Yes  |
|  |

#### **Chief Information Officer**

Does the Applicant employ a Chief Information Officer?



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|--|---------------------|
| Response<br>Yes                              |                     |

Follow-up: Chief Information Officer **Chief Information Officer Name** 

| Name of CIO:             |  |  |  |
|--------------------------|--|--|--|
| Response<br>Diana Prince |  |  |  |

#### **Chief Security Officer**

Do you have a Chief Security Officer (CSO) or equivalent?

| Response |  |
|----------|--|
| Yes      |  |
|          |  |

Follow-up: Chief Security Officer **Chief Security Officer Name** 

Name of CSO:

Response Joe Cool

#### **Supervisor of CSO or Security Policy Management and Compliance** Position(s)

To what position within the organization does this person report?

| esponse<br>harlie Brown |
|-------------------------|
|                         |

#### **Chief Privacy Officer**

Do you employ a chief privacy officer or an equivalent?

| _        |  |  |
|----------|--|--|
| Response |  |  |
| response |  |  |
| Yes      |  |  |
| 162      |  |  |
|          |  |  |



| Follow-up: Chief Privacy Officer Chief Privacy Officer Name  |
|--|
| Name of chief privacy officer:   |
| Response<br>Clark Kent   |
| Website Privacy Disclosure Statement   |
| Do you have a privacy disclosure statement on your website?  |
| Response<br>Yes  |
| Follow-up: Website Privacy Disclosure Statement Website Privacy Disclosure Statement URL   |
| URL to privacy disclosure statement:   |
| Response http://kaplandentalsuperfundentistry.com/privacy.html   |
| Secondary/Backup Computer System   |
| Does the Applicant have a secondary/backup computer system?  |
| Response<br>Yes  |
| Follow-up: Secondary/Backup Computer System Secondary/Backup Computer System Restore Time  If secondary/backup system is in place, how long before this system is operational? |
| Response 1h  |



## **Sensitive Data Backup and Restore Methodology**

| Do you have a backup and restore methodology for your sensitive data?   |
|---|
| Response<br>Yes   |
|   |
| Computer System and Data Back-ups Schedule                              |
| Do you run computer system and data back-ups on a regular basis?        |
| Response<br>Yes   |
|   |
| Daily Valuable/Sensitive Data Backups                                   |
| Is valuable/sensitive data backed-up by Applicant on a daily basis?     |
| Response<br>Yes   |
| Weekly Valuable/Sensitive Data Backups                                  |
| Is valuable/sensitive data backed-up by Applicant at least once a week? |
| Response<br>Yes   |
|   |
| Off-site Valuable/Sensitive Data Storage                                |
| Do you secure such data to an off-site storage location?                |
| Response<br>Yes   |
| Attached Images   |





#### **Exhibits**

offsiteDataStorage.png

#### Complete Back-up File Generation Secure Offsite Storage

Is at least one complete back-up file generation stored and secured offsite separate from the Applicant's main operations in a restricted area?

| Response |  |
|----------|--|
| Yes      |  |
|          |  |

#### **Backup and Storage Format**

What format do you utilize for backing up and storage of computer system data--tape or other media, online backup service, or other?

Response online backup service

## **Document Retention and Destruction Policy**

Do you have a document retention and destruction policy within your organization?

| Response<br>Yes |  |  |
|-----------------|--|--|
|                 |  |  |

## **Mobile Device Encryption Policy**

Do you have a written policy which requires that PII stored on mobile devices (e.g. laptop computers/smartphones) and portable media (e.g. flash drives, back-up tapes) be protected by encryption? Attach policy.

| Response<br>Yes |  |  |  |
|-----------------|--|--|--|
|                 |  |  |  |



## **Communication Encryption Policy**

Does the Applicant have and enforce policies concerning when internal and external communication

| should be encrypted?   |
|--|
| Response<br>Yes  |
| Compliant Procedure  |
| Does the Applicant have a procedure requiring the review or follow-up of complaints?   |
| Response<br>Yes  |
| Access Control Procedures  |
| Do your company's access control procedures address access to sensitive systems, files and directories? Attach and reference procedures. |
| Response<br>Yes  |
| Data Classification Scheme  Do your company's policies address access to data based on a data classification scheme?                     |
| Response<br>Yes  |
|  |



#### **Employees**

#### **Employee Access to PII Restriction**

| Do ' | you restrict employe | e access to PII on | a business-need to | know basis? |
|------|----------------------|--------------------|--------------------|-------------|
|------|----------------------|--------------------|--------------------|-------------|

| Pagnongo   |
|--|
| <b>Response</b><br>Yes   |
| Restricted Employee Access to Private Information                                |
| 1. Courtetou Employee 7. Courte in ormation                                      |
| Does the Applicant have restricted employee access to private information?       |
| Response<br>Yes  |
|  |
| New Hires Formalized Training Program  |
| Does the Applicant have a formalized training program for newly hired employees? |
| Response<br>Yes  |
|  |

#### **Data Privacy and Security Awareness Training**

Do you provide awareness training for employees on data privacy and security including legal liability issues, social engineering issues (e.g., phishing), spam, dumpster diving, etc.? Attach presentation or note training methodology.

| Response |  |  |  |
|----------|--|--|--|
| Yes      |  |  |  |

Follow-up: Data Privacy and Security Awareness Training

Data Privacy and Security Awareness Training Medium and

Frequency

If "Yes," please describe the medium and frequency of training:

#### Response

Steve provides the training monthly.



Yes

#### **Security Issues and Procedures Employee Training**

Is employee training conducted regarding security issues and procedures?

|     | •    | •   | • | • | • | • | • |
|-----|------|-----|---|---|---|---|---|
|     |      |     |   |   |   |   |   |
|     |      |     |   |   |   |   |   |
|     |      |     |   |   |   |   |   |
| Res | spoi | nse |   |   |   |   |   |

#### **Security Awareness Training**

At least once a year, do you provide security awareness training for everyone who accesses your network?

| Response |  |
|----------|--|
| Yes      |  |
|          |  |

# **Employee Computer and Information Systems Policies and Procedures**

Does the Applicant publish and distribute written computer and information systems policies and procedures to its employees?

| Response<br>Yes |
|-----------------|
|-----------------|

## **Annual Employee Training and Certification**

Do you provide annual employee training and certification?

| Response |  |  |
|----------|--|--|
| Yes      |  |  |
|          |  |  |

#### **Annual Security Awareness Training**

Does the company require annual security awareness training for all personnel so they are aware of their responsibilities for protecting company information and systems?

| Response<br>Yes |  |
|-----------------|--|
|-----------------|--|



#### **Employee Personal Liability**

Are employees aware of their personal liability and any potential ramifications if they aid, abet, or participate in a data breach incident involving the organization?

| Response<br>Yes |  |
|-----------------|--|
|-----------------|--|

#### **Employee Screening**

Does the company screen potential personnel prior to hire (e.g., background checks include previous employment history, drug, criminal record, credit history and reference checks)?

| Response<br>Yes |  |  |  |
|-----------------|--|--|--|
|                 |  |  |  |

#### **Applicant's Hiring Process Checklist**

In all cases, does the Applicant's hiring process include the following? (please check all that apply)

| Criminal Convictions   |
|------------------------|
| Educational Background |
| Credit Check           |
| Drug Testing           |
| Work History           |