

**We never got our arms around the root causes and consequences of systemic risk in financial systems, or the cyber impacts upon them**

- ***Consider a different way*** to look at financial institutions
- ***And a different way*** to quantify risk consequences to stakeholder and national interests
- **It may lead to more effective, measurable ways to manage Financial Enterprise Risk**

Andrew Haldane, Executive Director of the Bank of England, recently observed:

***“... systemic risk in the financial system is analogous to the reliability risks posed by complex networks encountered in fields such as ecology, epidemiology, biology and engineering...”***

## A Financial System Risk Dilemma

Critical infrastructure systems<sup>(1)</sup> are complex “systems-of-systems” with thousands of interdependent components and myriad channels.

As financial instruments, the organizations that hold them and the cyber technology that manipulates them, become more complex, they present *systemic risks* and *exploitable vulnerabilities* that - once triggered – have a runaway effect, with severe public consequences and enterprise costs.

### This changes everything!

- IT controls all information and every transaction
- Outsiders are insiders
- 2nd/3rd order threats (*e.g. counterparty risks*) are in the same league as liquidity or market risks
- Highly sensitive corporate information is exposed
- Small incidents have current period enterprise consequences

**(How) can we protect our most vital Information Assets?**

## System characteristics – complexity, real-time speed, constant change

<p>Significant Cyber impact</p> <ul style="list-style-type: none"> <li>• Information Asset privacy breach has enterprise risk implications</li> <li>• Affected by SW defect density</li> <li>• McKinsey comments regarding bank counterparty risk<sup>(1)</sup></li> </ul> <p>“... IT plays a major role in all four pillars...”</p>	<p>Level threat field</p> <ul style="list-style-type: none"> <li>• Outsiders are insiders</li> <li>• 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup> order risks have similar impact</li> </ul>
<p>Real-time dynamics: asset value, balance sheet fluctuations</p> <ul style="list-style-type: none"> <li>• Mark to Market</li> <li>• Money Market values</li> <li>• High-speed trading</li> </ul>	<p>Hides perpetrators</p> <ul style="list-style-type: none"> <li>• Cyberspace presents “covert channels”</li> <li>• Attribution is almost impossible</li> </ul>
<p>Exposure from major corporate transition programs</p> <ul style="list-style-type: none"> <li>• M&amp;A blending</li> <li>• Cloud adoption</li> </ul>	<p>May combust spontaneously</p> <ul style="list-style-type: none"> <li>• Hair trigger instabilities</li> </ul>

## High-impact<sup>(1)</sup> Consequences – Financial, Reputation, Regulatory

Good IT hygiene contains up to 95% of cyber risk  
and most consequences may be reversed or financially mitigated

When enterprise, stakeholder interests may be directly affected,  
fiduciaries look to these risk indicators:

1. Does it compromise company-private and insider information?
  - Corporate financials, executive communications and operations info are subject to leaks
2. Does it incite regulatory (and legal) overreach?
  - Even the *appearance* of compromised consumer privacy or share value erosion may incite regulatory response
3. Will we incur unplanned costs?
  - Costs to repair, respond and remediate breaches, fines and PR activities may have P&L or share value impact
4. Does it impact Public/Consumer Confidence?

(1) Almost 50% of Global 1,000 companies lost 20% or more in share price in less than a month during the past 10 years  
- some never recovered

Most major losses were as a result of a series of high-impact but low-likelihood events...”  
Deloitte report, *Disarming the Value Killers — A Risk Management Study*

## The Challenge

Identify hi-impact, enterprise risk to information assets with current period enterprise implications

1. Make order out of the complex system chaos



### ASSETS

Loans  
Deposits  
Equipment Leases  
FX  
Derivatives  
Warrants  
Stocks

### THREATS

Overall Economy  
Industry Economy  
Interest Rates  
Currency Fluctuations  
Market Volatility  
Market Liquidity  
Potential Changes in Tax Law  
Competition  
Inside fraud  
APTs

### VULNERABILITIES

Terms & Conditions  
Product Diversity/Concentration  
Counterparty Diversification  
Contingency Liquidity  
Leverage  
Liquidity  
Transparency  
Predictability of Asset Demand  
Capital Adequacy Position

2. Measure/rank order risks by consequence

3. Allocate Information Privacy resources commensurate with exposure

## How?

### *Identify* high-impact Information Assets

- See the whole picture
  - ✓ Discover and maintain Enterprise Risk Architecture
  - ✓ Apply a numerable asset-threat-vulnerability taxonomy
- Prioritize Information Assets by quantified potential exposure
  - ✓ FMEA system engineering techniques
  - ✓ Actual value vs probable value
  - ✓ Current (10Q) financial consequence & brand impact

### *Protect* high-impact Information Assets (and control signals)

- Protect the DNA from inside – *beyond simple encryption*
- Adopt a consequence-based Risk Triage policy – a crisis response “knee board”

## Identify high impact information assets

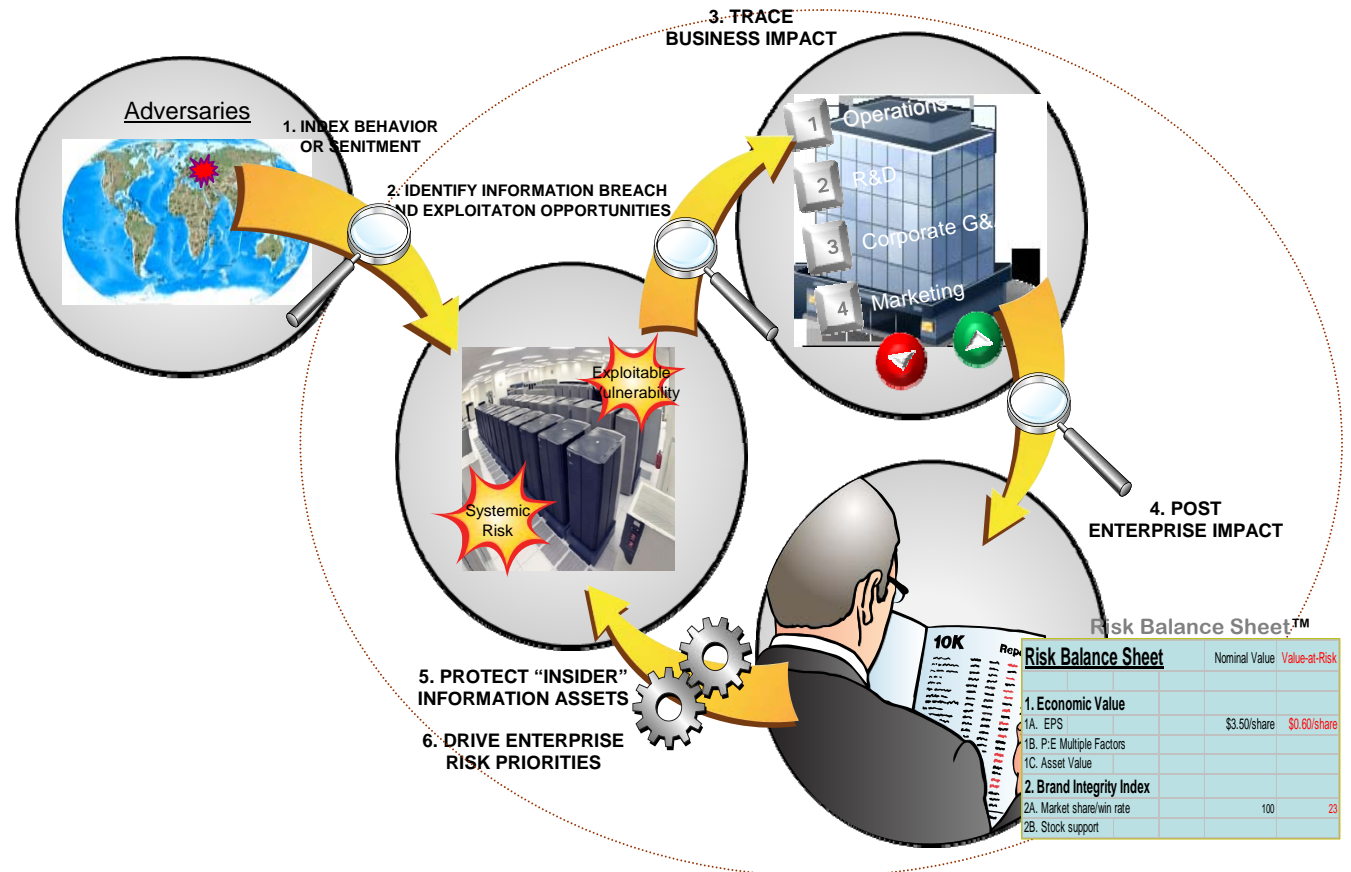
### “Discover” Enterprise Risk Architecture

Trace propagation of breach incidents “from stakeholder to wiring closet to board room”.

- Quantify Financial Consequences
- Measure evolving stakeholder sentiment

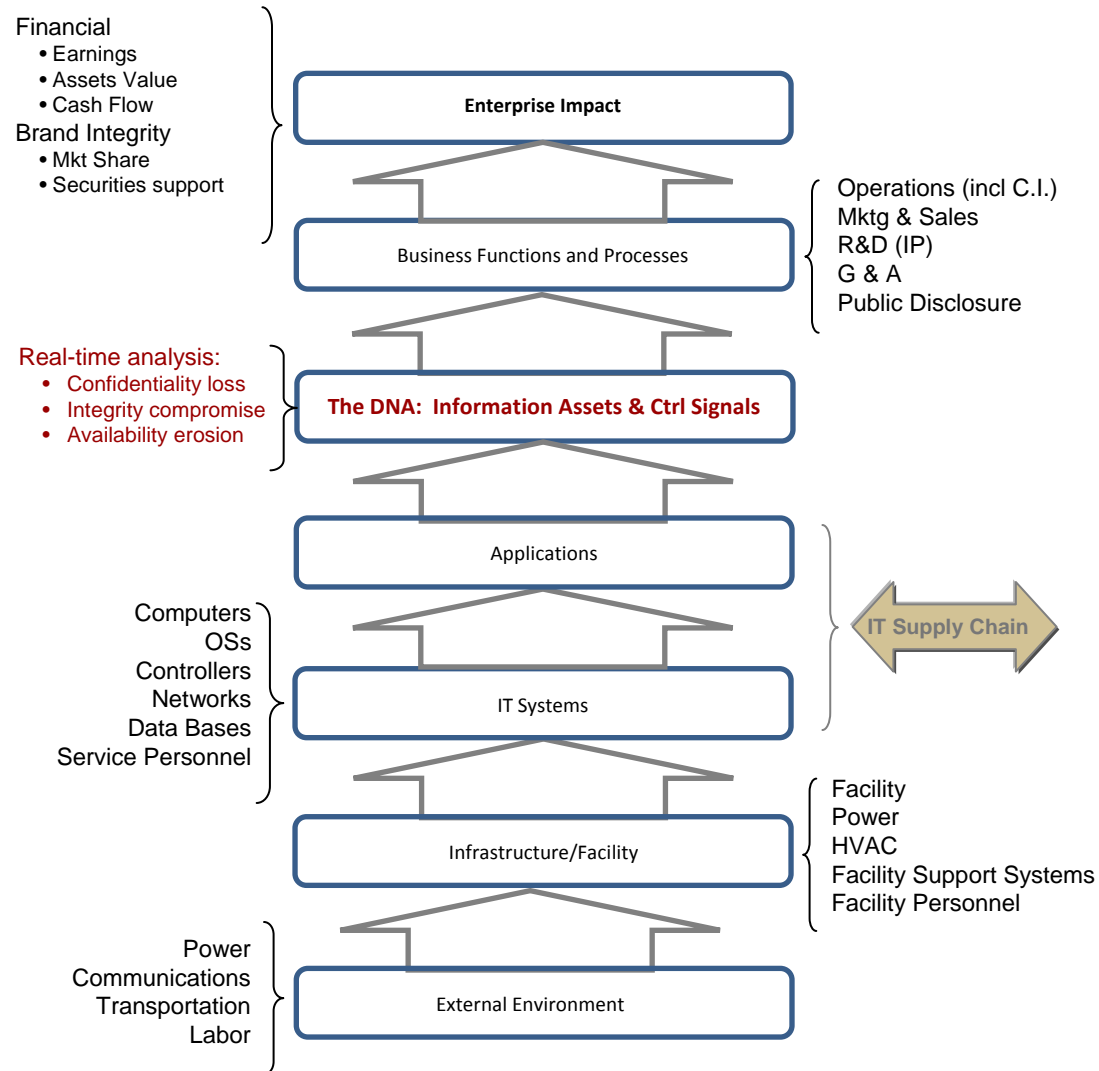
Drive expenditures from a risk balance sheet

- commensurate with Financial and Brand (Political) Exposure





## A simple Enterprise *Risk* Architecture line of sight



## Protection from inside – beyond simple encryption

### Render high-impact corporate information (DNA) near-tamperproof

- Protect from within so that **WHEN** it is found, it cannot be compromised
- Encryption is part of a complete solution

#### Encryption

- Hides/un-hides data, but the original data are not altered

- Data are either completely hidden or *completely revealed*

- All data are affected and *nothing sensitive is removed*

#### Data Masking

- Alters data to permanently “remove” data or parts of data that are not to be revealed (that is, private or sensitive)

- Due to implications and the arrangement of the data, often **large amounts of data must be masked**

- Large amounts of data affected which *substantially reduces value for testing*

#### Information Obfuscation

- Alters permanently the “information” content that the data represents

- **Generally only major relationships need to be altered**

- **Generally a small fraction of the data is affected resulting in much less processing**

## Future Preparation

### **Short term:** Adopt a Risk Triage policy

- Many attacks rely on saturation
- Prioritize and focus resources on high-impact incidents

### **Long term:** Re-arrange coupling of critical information (and control signal) processing “islands”

- Apply resilient interconnection architectures
  - ✓ Public networks
  - ✓ Highly controlled access (guards and information diodes)
  - ✓ Air gaps
- Apply DHS Safety Act designated information protection

## Educate Executives, Fiduciaries, Board Members

**Become aware of enterprise implications of cyber risk**

**Imbed cyber risk in Enterprise Risk Policy**

- Identify and Protect High-impact Information Assets
- Allocate resources commensurate with exposure
- Demonstrate due care

**Know when you're done!**



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