Forecasting Data Breaches



Agenda

- What is probability
- Developing a model
- What is the model; what does it **teach**.
- What is the model-risk
- The most effective way to reduce data breach

What is Probability

How we sell security

What business wants to know

Risk = Impact x Probability

 $1,000,000 \times 0.5 = 500,000$

After controls are deployed

Residual-risk = Impact x Residual-probability

 $1,000,000 \times 0.0001 = 100$

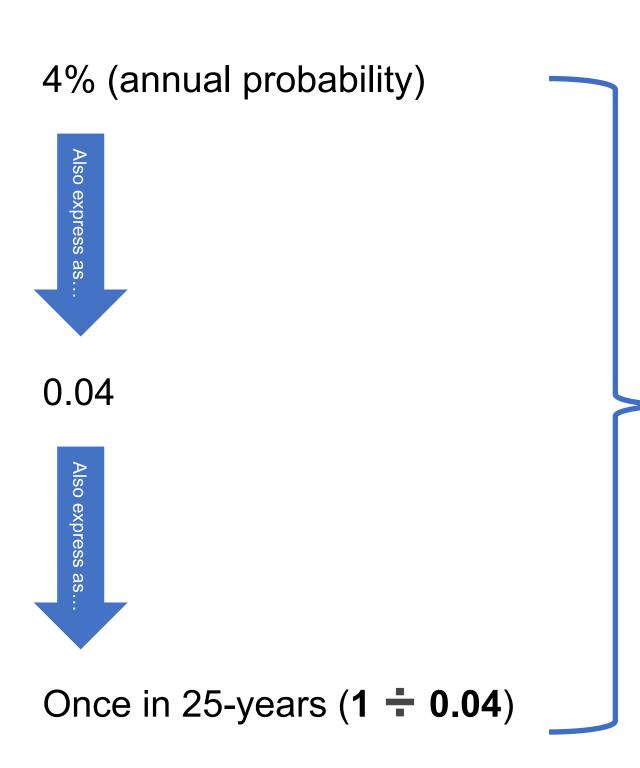
Enterprise residual-risk = Impact $x \sum Residual$ -probability

 $1,000,000 \times (0.0001+0.0003) = 400$

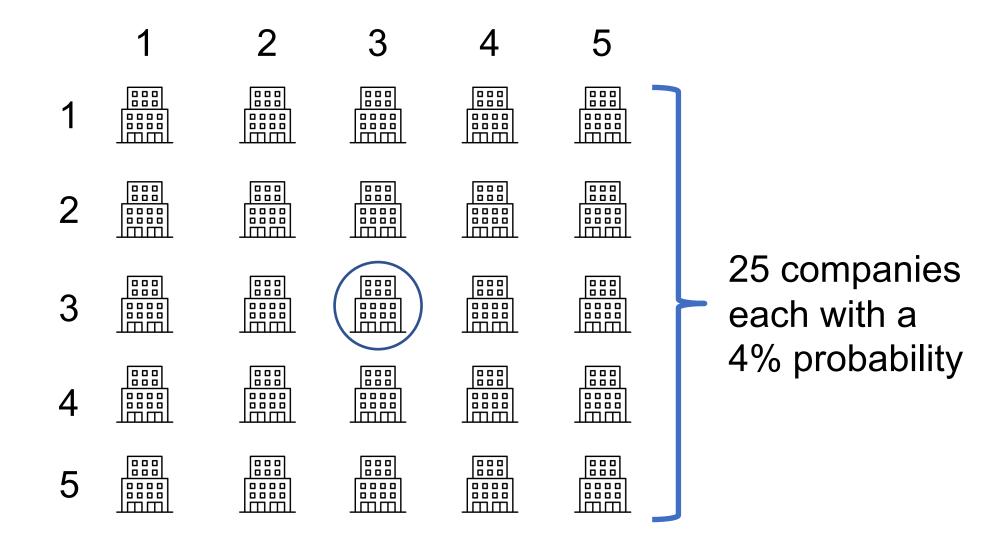
This talk

Another way the breach can happen, and a control has been deployed

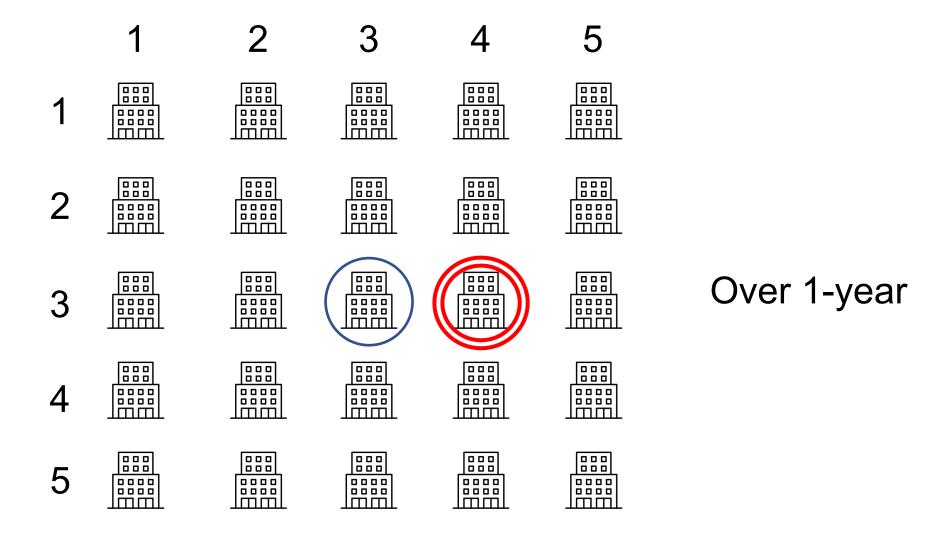
What is Probability



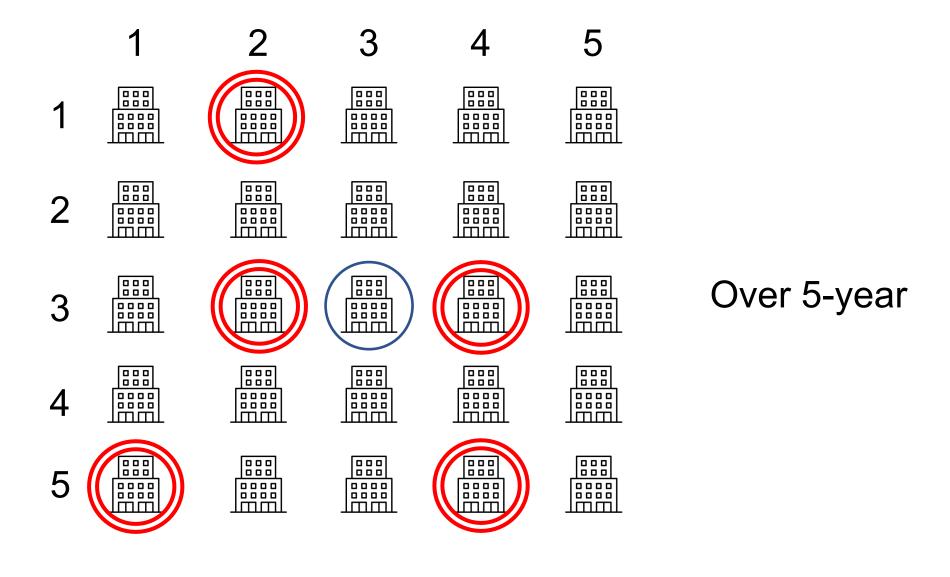
All indicate the same probability



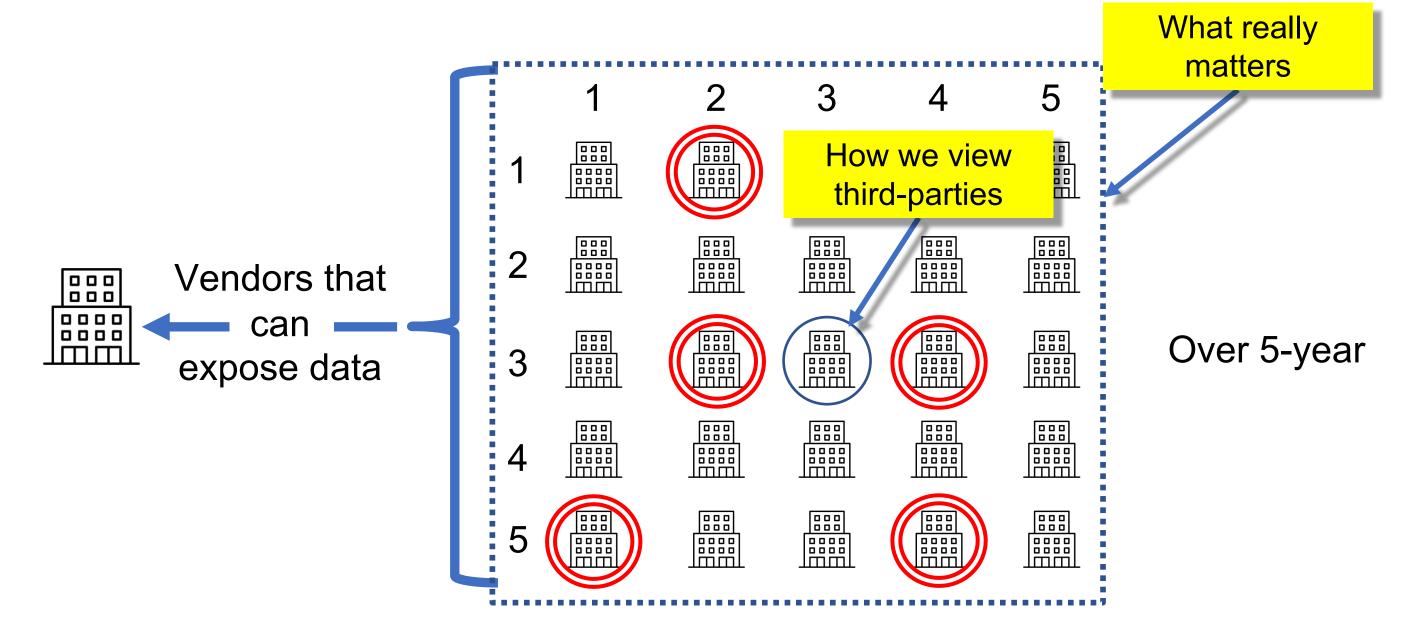














How to Develop a Model

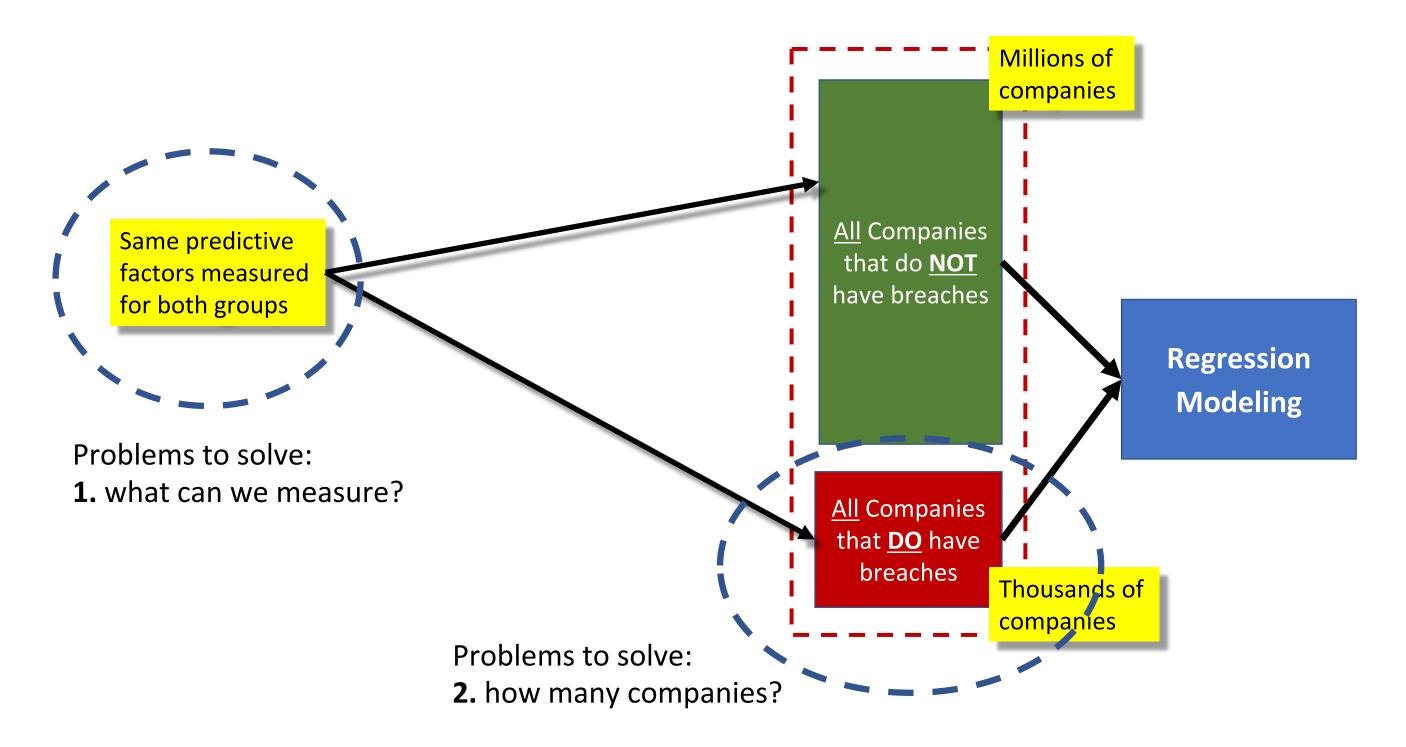
Finding the differences between all companies that did and did not experience data breach

Types of PII Data Breaches

Incident	Description	Examples
Malicious Outsider	Any attack by someone <u>unknown</u> to the company, that exposes PII data	 Phishing attack Entry through an unpatched vulnerability in DMZ Malware
Malicious Insider	Any PII theft by someone known to the company, including employees, ex-employees and vendors	 Unauthorized data access PII theft by employee exiting company PII theft from a call center
Accident	Any kind of accident within the company, or by company vendors, that exposes PII data	 Email/mail PII data to wrong person or company Placing SSN on an envelope Deploy new software that allows unauthorized access Failing to erase the disk of a discarded computer
Lost or Stolen	Any kind of lost or stolen device that exposes PII data	 Laptop or thumb drive stolen from a car, house or offices Magnetic tape that is lost in transit Computer or backup drive lost track of in an office move A misplaced thumb drive with PII data

How to predict data breach

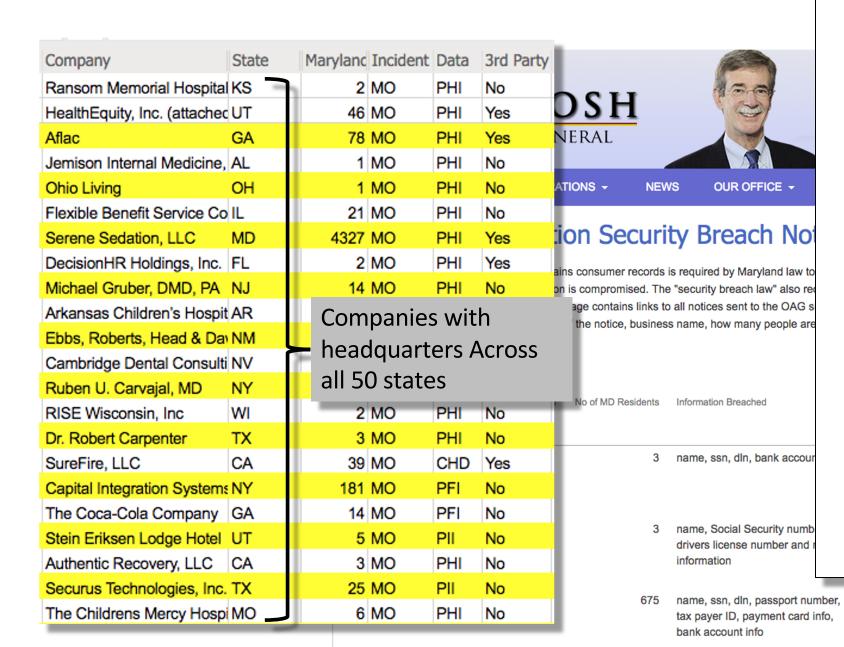
Model <u>all</u> breach and <u>all</u> no-breach companies



How we solved problem 2

How many data breaches are there?

Sources of Data Breaches





1275 Drummers Lane, Suite 302

Wayne, PA 19087

Paul McGurkin Jr. Office: 267-930-4798

267-930-4771 Email: pmcgurkin@mullen.law

August 31, 2018

VIA E-MAIL & U.S. MAIL

Office of the Attorney General Attn: Security Breach Notification 200 St. Paul Place

Baltimore, MD 21202

E-Mail: idtheft@oag.state.md.us

Re: Notice of Data Security Incident

Dear Attorney General Healey:

We represent Movement Mortgage LLC ("Movement"), 8024 Calvin Hall Road, Indian Land, SC 29707, and are writing to notify you of a recent incident that may affect the security of the personal information of six hundred and seventy-five (675) Maryland residents. Movement's response to this incident is ongoing, and this notice will be supplemented with any new significant facts learned subsequent to its submission. By providing this notice, Movement does not waive any rights or defenses regarding the applicability of Maryland law, the applicability of the Maryland data incident notification statute, or personal jurisdiction.

Nature of the Data Security Incident

Earlier this year Movement discovered that several employee email accounts were sending phishing emails. Movement quickly launched an investigation, with the assistance of a third party forensic investigator, to understand the nature and scope of the event and determine whether any sensitive data was at risk. The forensic investigator confirmed that numerous employee email ere subject to unauthorized access between October 9, 2017 and March 20, 2018. A

unauthorized access to employee email accounts

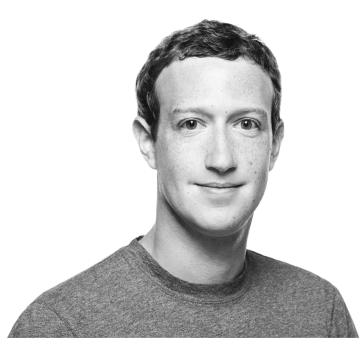
Maryland Data Breaches can be Accurately Predicted

	Breaches Re	ported to Maryland					eported to Maryland		
State	Observed	Predicted	GDP	Maryland	State	Observed	Predicted	GDP	Maryland
AK	5	-3	51,479	4,273	MS	2	3	109,375	1,018
AL	10	8	211,196	780	MT	3	-1	47,079	1,947
AR	3	4	122,704	1,050	NC	22	21	540,497	437
AZ	7	9	326,446	2,277	NE	3	3	119,588	1,153
CA	99	97	2,797,601	2,625	NJ	27	26	602,069	179
CO	15	10	345,233	1,663	NM	1	1	94,211	1,861
СТ	8	13	264,510	253	NV	1	2	158,302	2,408
DC	17	12	72,461	38	NY	58	62	1,606,601	188
DE	4	13	135,768	74	ОН	28	25	645,747	413
FL	32	35	976,386	744	OK	3	5	188,632	1,319
GA	23	21	563,608	664	OR	10	4	227,155	2,808
IA	5	6	183,930	1,020	PA	40	34	756,269	101
ID	4	-1	72,294	2,379	RI	4	5	59,306	372
IL	45	30	822,540	702	SC	7	9	221,690	570
IN	15	14	352,273	579	TN	15	13	349,569	703
KS	9	4	159,108	1,254	TX	55	57	1,645,136	1,416
KY	5	8	202,175	610	UT	9	3	164,917	2,086
LA	2	8	235,960	1,126	VA	30	24	510,586	147
MA	21	22	542,979	412	VT	2	3	32,545	478
MD	67	65	399,538	0	WA	7	15	524,323	2,764
MI	11	19	508,905	628	WI	13	12	321,373	789
MN	13	12	350,179	1,109	WV	2	5	74,047	365
MO	9	10	303,763	1,060					

Total US Data Breaches can now be Accurately Predicted

	Breaches Re	ported to Maryland	600	Distance to		Breaches Reported to Maryland		Distance to
State	Observed	Predicted	GDP	Maryland	State	Observed Predicted	GDP	Maryland
AK	5	52	51,479	0	MS	Cot distance	109,375	0
AL	10	58	211,196	0	MT	Set distance to zero	47,079	0
AR	3	55	122,704	0	NC	44 10	540,497	0
AZ	7	62	326,446	0	NE	3 55	119,538	0
CA	99	151	2,797,601	0	NJ	27 <mark>72</mark>	602,069	0
CO	15	63	345,233	0	NM	1 54	94,211	0
СТ	8	60	264,510	0	NV	1 56	158,302	0
DC	17	53	72,461	0	NY	58 <mark>108</mark>	1,606,601	0
DE	4	55	135,768	Forecast total	OH	28 74	645,747	0
FL	32	86	976,386	breaches for	OK	3 <mark>57</mark>	188,632	0
GA	23	71	563,608	state	OR	10 <mark>59</mark>	227,155	0
IA	5	57	183,930	0	P.4	40 <mark>78</mark>	756,269	0
ID	4	53	72,294	0	RI	4 53	59,306	0
IL	45	80	822,540	0	SC	7 59	221,690	0
IN	15	63	352,273	0	TN	15 63	349,569	0
KS	9	56	159,108	0	TX	55 <mark>110</mark>	1,645,136	0
KY	5	58	202,17 <mark>5</mark>	0	ПТ	9 57	164,917	0
LA	2	59	235,96	Total brea	choc:	2057	510,586	0
MA	21	70	542,97	TOtal Diea	ches.	2937	32,545	0
MD	67	65	399,53	Papartad	to Mar	yland: 771	524,323	0
MI	11	69	508,90	reported	to ivial	ylaliu. III	321,373	0
MN	13	63	350,17 <mark>9</mark>	0	WV	2 53	74,047	0
MO	9	61	303,763	0				







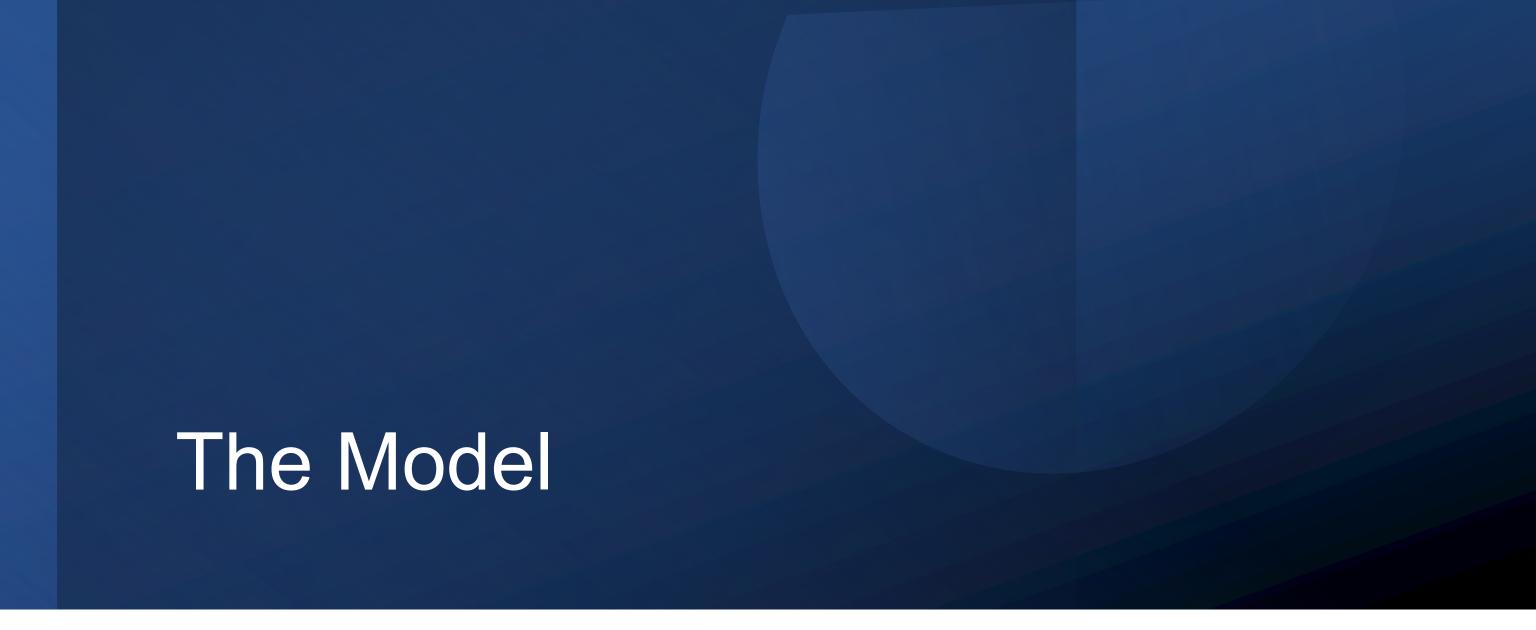
Poll 1

If Russia required reporting of PII data breaches, would you expect:

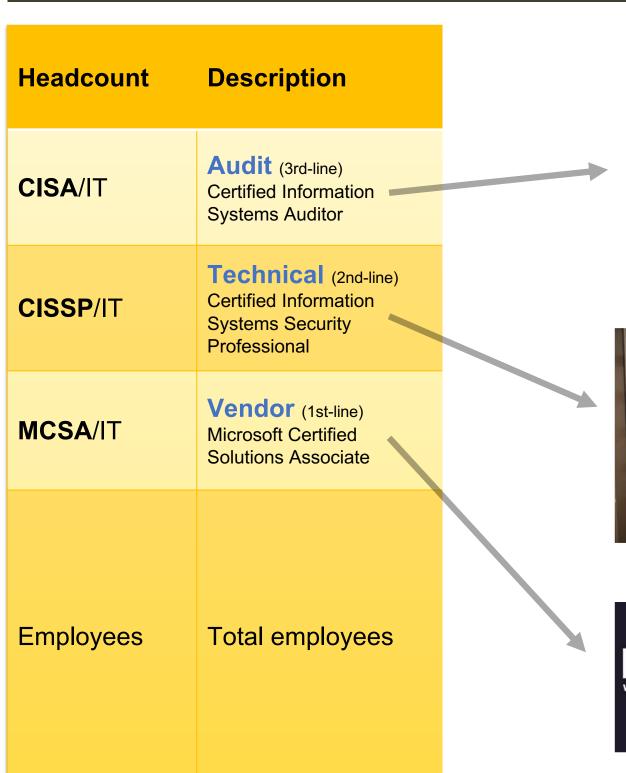
- A. A similar number of data breaches as California, because Russia develops a lot of high technology
- B. A similar number of data breaches as Texas because both Russia and Texas have oil economies
- C. A similar number of data breaches as Texas because Texas GDP is \$1.6T and Russia GDP was \$1.7T

The Answer is C: Russia and Texas have similar GDP

	Breaches Reported to Maryland		CDD	Distance to			eported to Maryland	600	Distance to
State	Observed Pr	edicted	GDP	Maryland	State	Observed	Predicted	GDP	Maryland
AK	5 -3		51,479	4,273	M:	5 2	3	109,375	1,018
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MN	13 12		350,179	1,109	W	7 2	5	74,047	365
MO	9 10		303,763	1,060					



Headcounts can predict data breach





AUDITOR

People side of cybersecurity



Technical side of cybersecurity



Vendor side of cybersecurity (consider also AWS, CISCO, etc.)



		Effect				
Headcount	Description		Small Breach	Large Breach		
CISA/IT	Audit (3rd-line) Certified Information Systems Auditor	bility sk)	Strong but Saturates	Very strong, does NOT saturate		
CISSP/IT	Technical (2nd-line) Certified Information Systems Security Professional	Decrease Probability (decreased risk)	Strong but Saturates	Very strong, does NOT saturate		
MCSA/IT	Vendor (1st-line) Microsoft Certified Solutions Associate	Decr	Modest and saturates			
Employees	Total employees	Increase Probability (increased risk)	Moderate	Moderate		

		Effect			
Headcount	Description		Small Breach	Large Breach	
CISA/IT	Audit (3rd-line) Certified Information Systems Auditor	billity sk)	Strong but, diminishing return	Very strong, no diminishing return	
CISSP/IT	Technical (2nd-line) Certified Information Systems Security Professional	rease Probability ecreased risk)	Strong but, diminishing return	Very strong, no diminishing return	
MCSA/IT	Vendor (1st-line) Microsoft Certified Solutions Associate	p)	Modest and diminishing return	Weak	
Employees	Total employees	Increase Probability (increased risk)	Moderate	Moderate	

Equal Effectiveness

Other observations

- RHCE (Red Hat Certified Engineer) a Linux certification <u>increases</u> <u>probability</u> for data breach and is also in the model.
- Many other certifications were tried and found to be predictive by themselves, but did not increase the accuracy when combined with CISSP.
- Counting employees with certifications was better than simply a count of people in cybersecurity.



VivoSecurity

An analogy: predicting family size Best (most accurate) model





An analogy: predicting family size Best (most accurate) model





Certification-Handicapping

Predicting which company is best, without the direct use of the model

Take a picture of this with your phone



Measure	Decrease Probability (Decrease Risk)				
IVICASUIC	Small Breach	Large Breach			
CISA/IT	Strongly	Very Strongly			
CISSP/IT	Strongly	Very Strongly			
MCSA/IT	Moderate	Weak			



Take a picture of this with your phone



Measure	Increase Probability (Increase Risk)			
Weasure	Small Breach	Large Breach		
Employees	Moderate	Moderate		
RHCE/IT	Modest	Weak		



Poll 2: According to the model, which has the lowest probability for a data breach?

Note: all of these banks are very good!

L	1
	•

Headcount	Measure
82K	Employees
22	RHCE
204	CISSP
181	CISA
90	MCSA
7.5K	IT





B

Headcount	Measure
89K	Employees
20	RHCE
333	CISSP
275	CISA
95	MCSA
7.5K	IT





C

Headcount	Measure
49K	Employees
21	RHCE
181	CISSP
157	CISA
74	MCSA
4.5K	IT





The answer is: BMO (C)

Breach sizes

Annual probabilities

1	Δ	\
•	,	•

Headcount	Measure
82K	Employees
22	RHCE
204	CISSP
181	CISA
90	MCSA
7.5K	IT



	1+	10+	100+	1/+	10K±	Years l	oetween l	oreaches	100M+
Probability	26%	26%	25%	20%	8.2%	3.0%	0.84%	0.075%	0.011%
Years	3.8	3.8	4.0	5.0	12	33	119	1333	9091

B

Headcount	Measure
89K	Employees
20	RHCE
333	CISSP
275	CISA
95	MCSA
7.5K	IT



	1+	10+	100+	1K+	10K+	100K+	1M+	10M+	100M+
Probability	22%	22%	20%	15%	4.5%	1.4%	0.30%	0.019%	0.0022%
Years	4.5	4.5	5.0	6.7	22	71	333	5263	45455

C

Headcount	Measure
49K	Employees
21	RHCE
181	CISSP
157	CISA
74	MCSA
4.5K	IT



	1+	10+	100+	1K+	10K+	100K+	1M+	10M+	100M+
Probability	12%	12%	12%	8.3%	2.7%	0.83%	0.19%	0.012%	0.0015%
Years	8.3	8.3	8.3	12	37	120	526	8333	66667

The answer is: BMO (C)

74

4.5K

MCSA

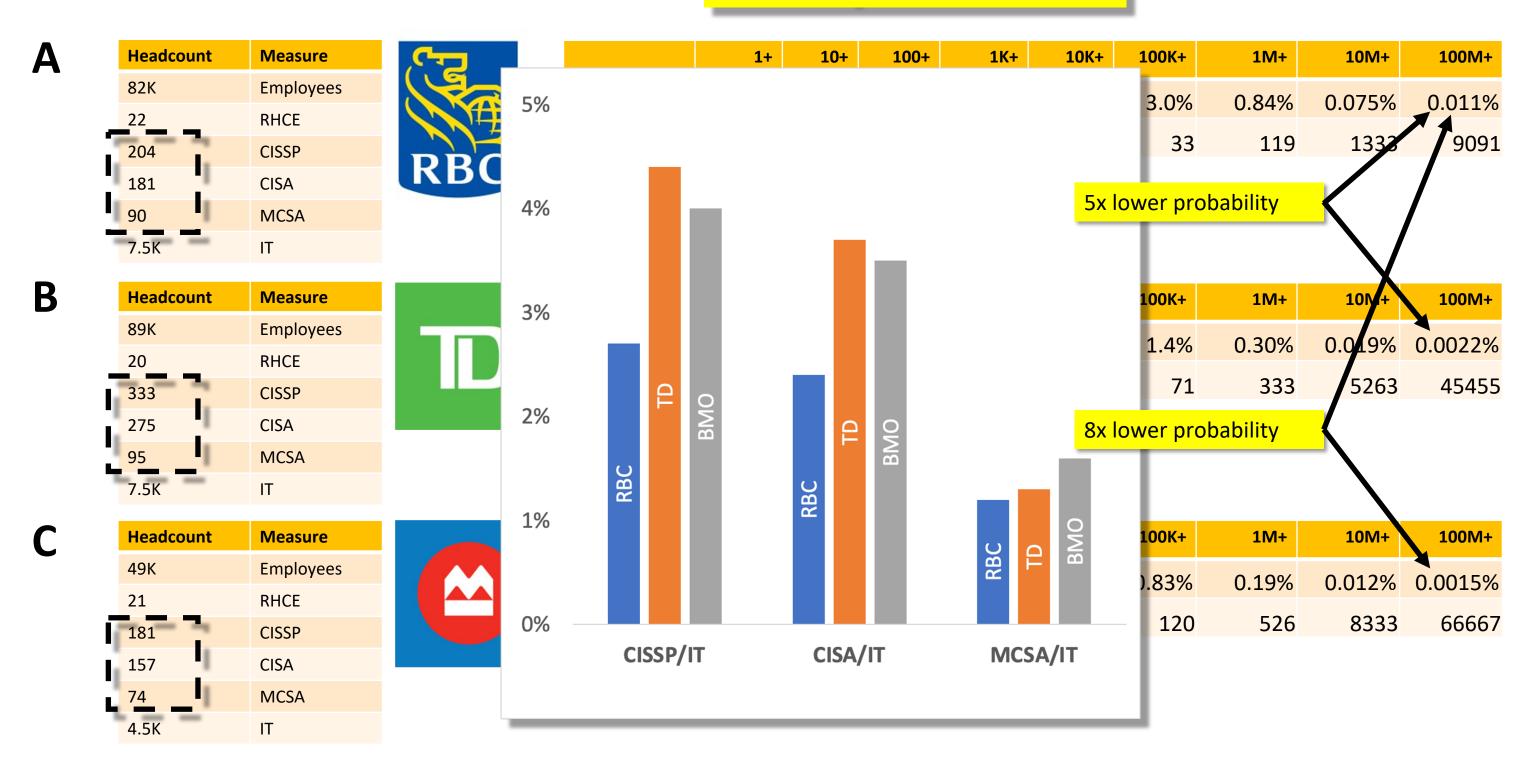
ΙT

				_					small da	ata brea	ches		
Α	Headcount	Measure	رتی		1+	10+	100+	1K+	10K+	100K+	1M+	10M+	100M+
	82K	Employees		Probability	26%	26%	25%	20%	8.2%	3.0%	0.84%	0.075%	0.011%
	22	RHCE	为生	Years	3.8	3.8	4.0	5.0		33	119	1333	9091
	204	CISSP	RBC	rears -	3.0	3.0	4.0	3.0	12	33	119	1333	9091
	181	CISA	MDC										
	90	MCSA											
	7.5K	IT											
D	Handarunt.	B.0			_				1011				
В	Headcount	Measure	24		1+	10+	100+	1K+	10K+	100K+	1M+	10M+	100M+
	89K	Employees		Probability	22%	22%	20%	15%	4.5%	1.4%	0.30%	0.019%	0.0022%
	20	RHCE		Years		4 5	г 0	6.7	22	71	222	F262	45455
	333	CISSP		rears	4.5	4.5	5.0	6.7	22	/ 1	333	5263	45455
	275	CISA											
	95	MCSA											
	7.5K	IT							Smaller	compan	ies can m	ore	
	Headcount	Measure			1+	10+	100+				nall breac		100M+
						10+	100+	INT					TOOIVIT
	49K	Employees		Probability	12%	12%	12%	8.3%	2.7%	0.83%	0.19%	0.012%	0.0015%
	21	RHCE		Years	8.3	8.3	8.3	12	37	120	526	8333	66667
	181	CISSP		10010	0.5			12	57	120	320	0333	00007
	157	CISA							•				

Large companies have

The answer is: BMO (C)

Probability for large data breach is very sensitive to CISSP and CISA and there is no diminishing return.



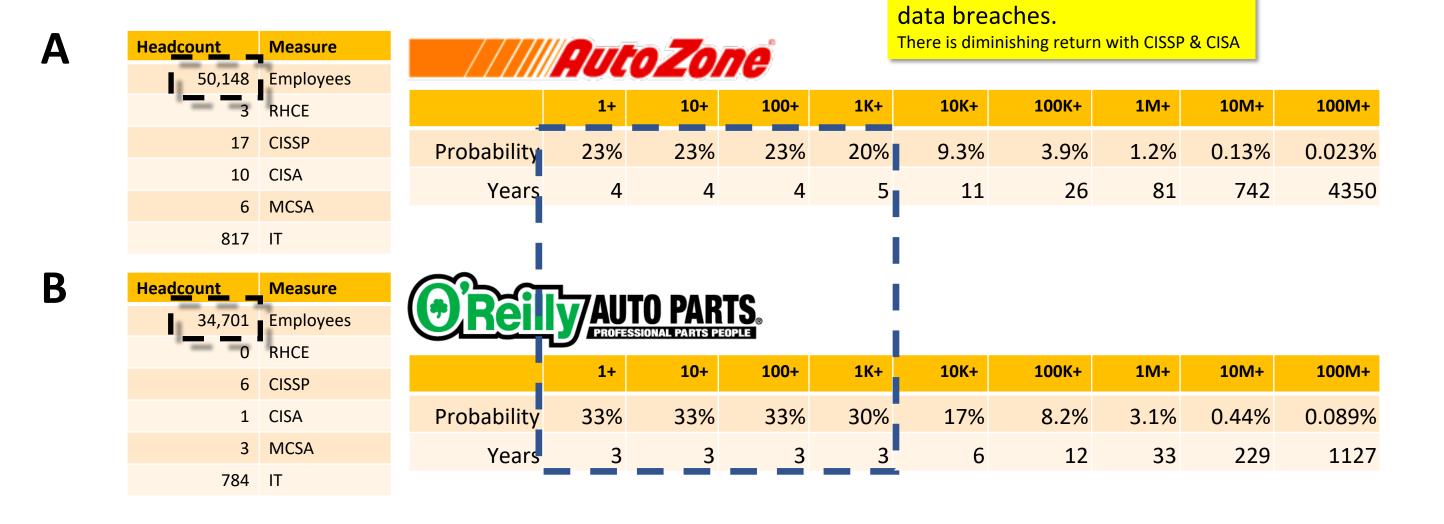
Poll 3: According to the model, which has the lowest probability for a data breach?

Α	Headcount	Measure	Outo Zono
	50,148	Employees	HULUZUIIG
	3	RHCE	
	17	CISSP	
	10	CISA	
	6	MCSA	
	817	IT	

_		
В	Headcount	Measure
	34,701	Employees
	0	RHCE
	6	CISSP
	1	CISA
	3	MCSA
	784	IT



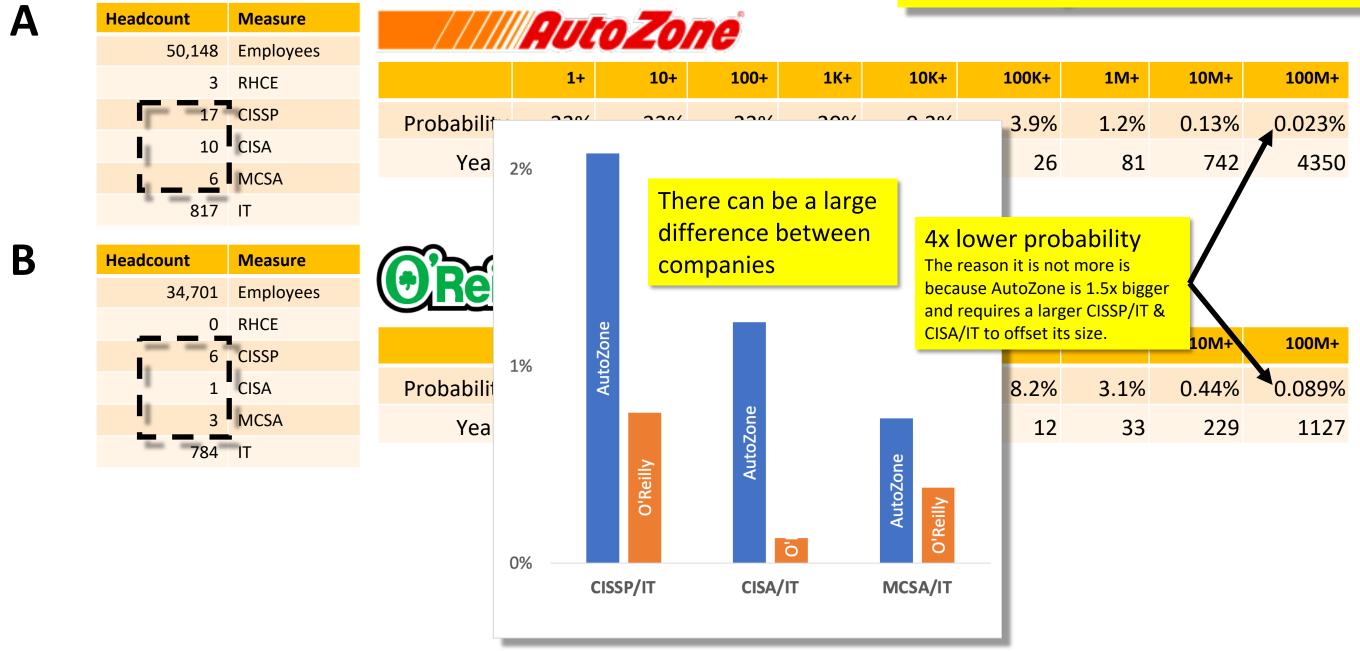
The answer is: AutoZone (A)



Large companies have small

The answer is: AutoZone (A)

Probability for large data breach is very sensitive to CISSP/IT and CISA/IT and there is no diminishing return.





The risk from using a model to make business decisions

There are standards



Office of the Superintendent of

Bureau du surintendant des

Guideline

Subject: Enterprise-Wide Model Risk Management for Deposit-Taking

Institutions

Category: Sound Business and Financial Practices

E-23 **Date: September 2017** No:

This Guideline outlines OSFI's expectations around institutions' establishment of sound policies and practices for an enterprise-wide model risk management framework. It applies to banks, bank holding companies, federally regulated trust and loan companies and cooperative retail associations, and collectively referred to as 'institutions'.



BOARD OF GOVERNORS

FEDERAL RESERVE SYSTEM

WASHINGTON, D.C. 20551



TO THE OFFICER IN CHARGE OF SUPERVISION AT EACH FEDERAL RESERVE BANK

SUBJECT: Guidance on Model Risk Management

The Federal Reserve and Office of the Comptroller of the Currency (OCC) are issuing the attached Supervisory Guidance on Model Risk Management, which is intended for use by banking organizations and supervisors as they assess organizations' management of model risk. This guidance should be applied as appropriate to all banking organizations supervised by the Federal Reserve, taking into account each organization's size, nature, and complexity, as well as the extent and sophistication of its use of models (as defined and discussed below).

Two ways to test

During model development

- Jackknife
- Benchmarking
- lift chart

A larger bank will have a model validation team to evaluate this before a model can be used.

After development

 Back testing: apply to vendors and compare forecast with data breach history

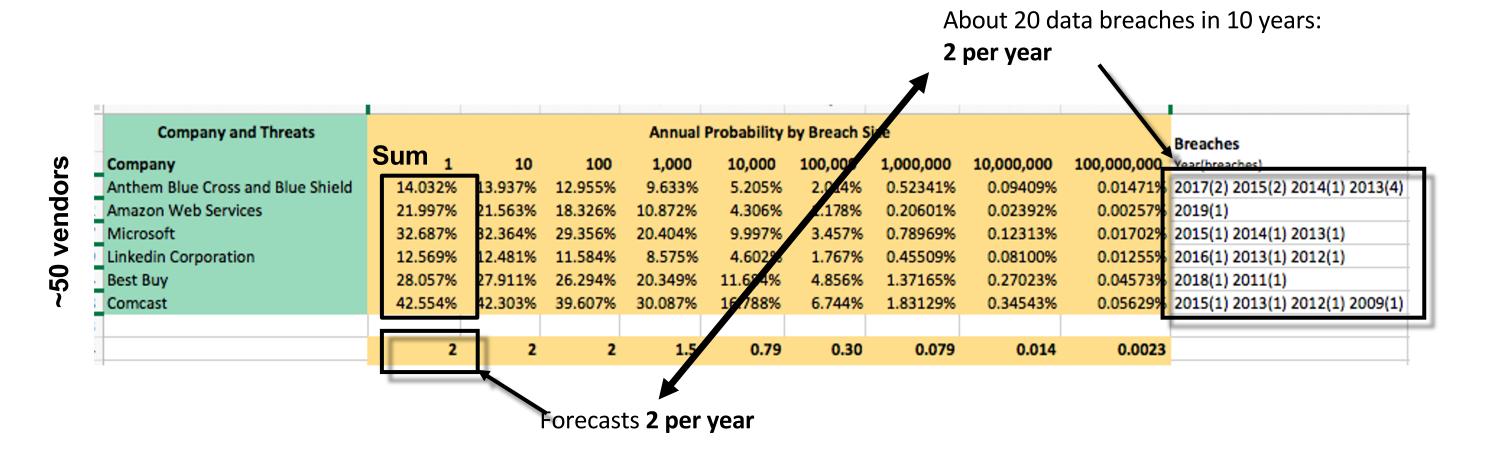
Q model validation model validation Unsave 603 results Experience: 2010 - 2014 (4 yrs 6 mos) · TD · Senior Manager - Mode... 6 shared connections Associate Vice President - Non-Retail Model Validation · TD Save Toronto, Ontario, Canada 6 years 11 months in role | 13 years 9 months in company About: I have worked in TD's Model Validation (MV) group for...see more Experience: 2014 - 2016 (1 yr 9 mos) · TD Risk Management · Senior. 4 shared connections Senior Manager, Advanced Analytics (Quants) - Model Validation · TD Toronto, Ontario, Canada 2 months in role | 2 months in company Experience: 2021 - 2022 (1 yr 3 mos) · RBC Capital Markets · Senior...

TD Bank has 603 people in

Note: that data breaches are rare events. A forecasting model cannot be test on a single company.

Back Testing

Cumulative forecast matches the past



CISA is the low hanging fruit

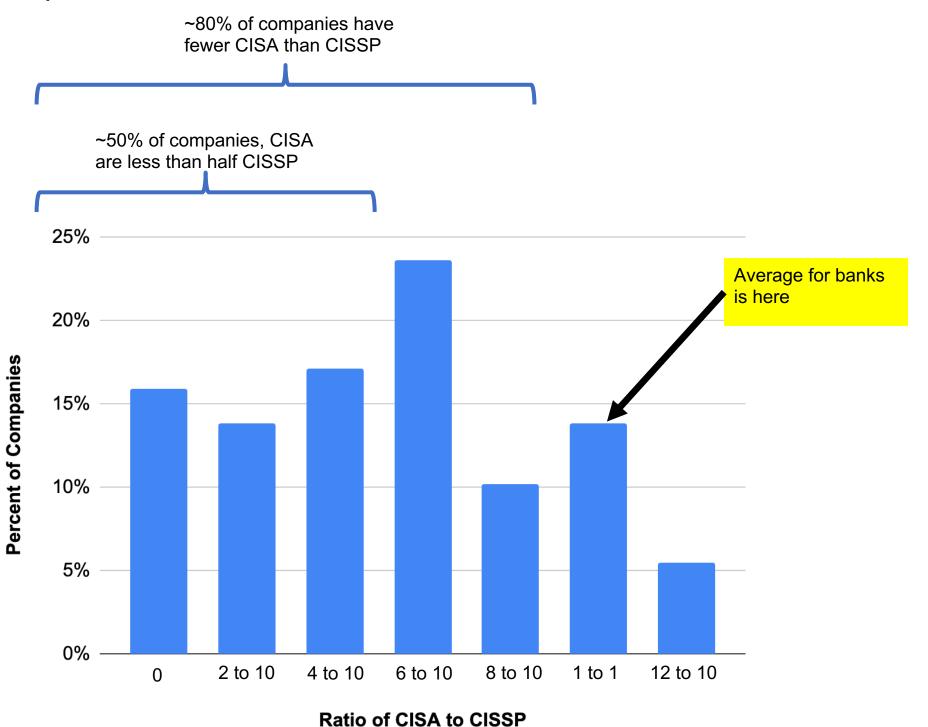
Hiring more CISA is the most effective way to reduce data breaches

		Effect					
Headcount	Description	Diminishing	Small Breach	Large Breach			
CISA/IT	Audit (3rd-line) Certified Information Systems Auditor	return (sk)	Strong but, diminishing return	Very strong, no diminishing return			
CISSP/IT	Technical (2nd-line) Certified Information Systems Security Professional	ease Probability creased risk)	Strong but, diminishing return	Very strong, no diminishing return			
MCSA/IT	Vendor (1st-line) Microsoft Certified Solutions Associate	p)	Modest and diminishing return	Weak			
Employees	Total employees	Increased Probability (increased risk)	Moderate	Moderate			

Equal Effectiveness

Ratio of 3rd-line of defense (CISA) to 2nd-line of defense (CISSP)

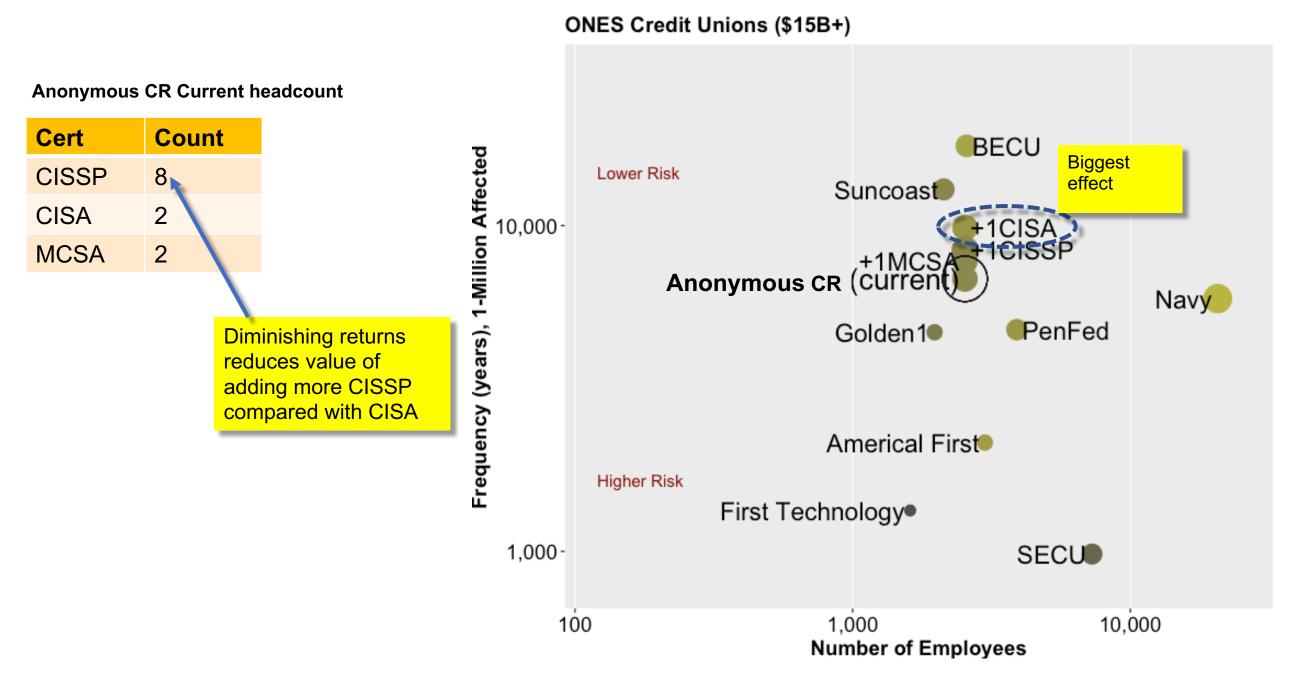
Analysis of 1,500 companies





Sensitivity Analysis

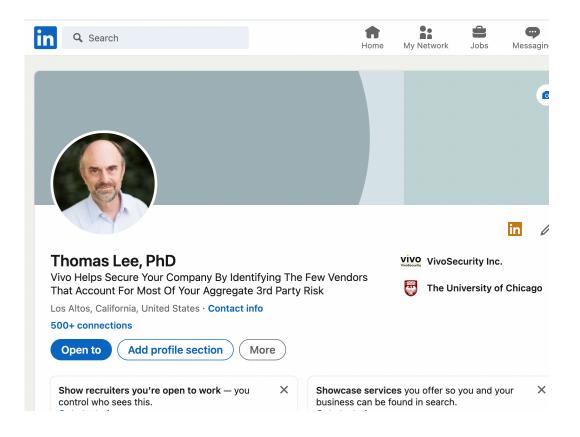
Increasing CISA-headcount has the biggest effect





Linkup with me

Tell me how you interpret results from modeling



Send me an email

Tell me how you interpret results from modeling

ThomasL@VivoSecurity.com

