

#### **John Elliott**

Data Protection Officer @ Large European Airline | Author @ Pluralsight @withoufire



My name is ... John I am ... **ENTP** 

#### **ENTP**



- E Extroversion preferred to introversion: ENTPs gain energy through interactions with people or objects in the outside world.
- N Intuition preferred to sensing: ENTPs tend to be more abstract than concrete. They focus their attention on the big picture rather than the details first, and on future possibilities rather than immediate realities.
- T Thinking preferred to feeling: ENTPs tend to value objective criteria above personal preference. When making decisions, they generally give more weight to logic than to social considerations.
- P Perception preferred to judgment: ENTPs tend to withhold judgment and delay important decisions, preferring to "keep their options open" should circumstances change.

## I should be good at ...



- Innovation
- Original thoughts
- Invention
- Visionary things
- Being a Lawyer (!)

#### I'm not awesome at ...



- Following through with detailed plans
- Thinking of the needs of other people
- Single tasking
- Responding well to authority....

## Here's my thought





## Here's my thought





## **Starting Point**



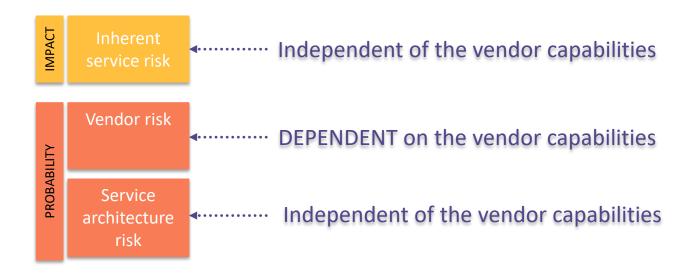
This has nothing to do with compliance

Which third parties are most likely to lose data

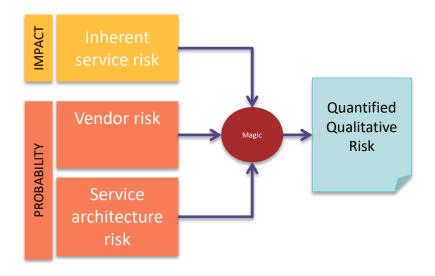
What can I do to minimize this risk

## Vendor / Supplier / 3<sup>rd</sup> Party risk is ...

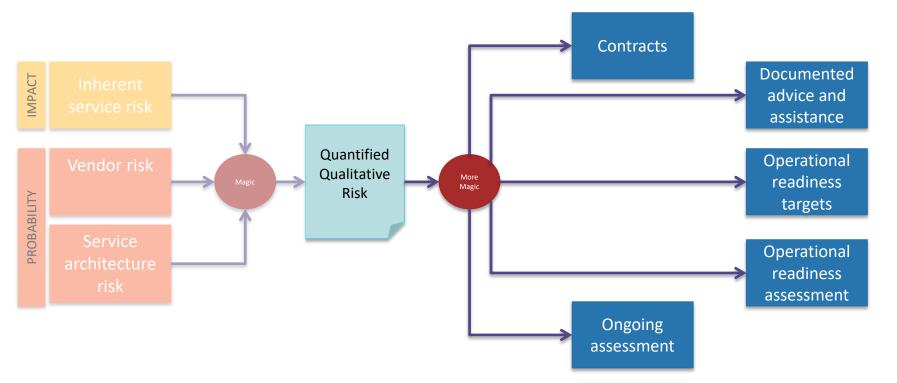














Inherent service risk

Vendor risk

Service architecture

There could be infinite variables here



There are less options here

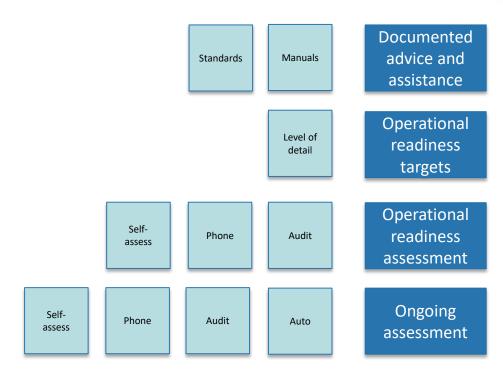
Documented advice and assistance

Operational readiness targets

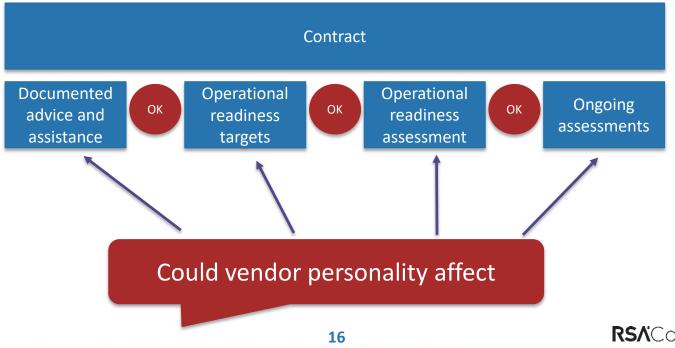
Operational readiness assessment

Ongoing assessment









## 3-axis of supplier personalities



Knowledge

Able to execute

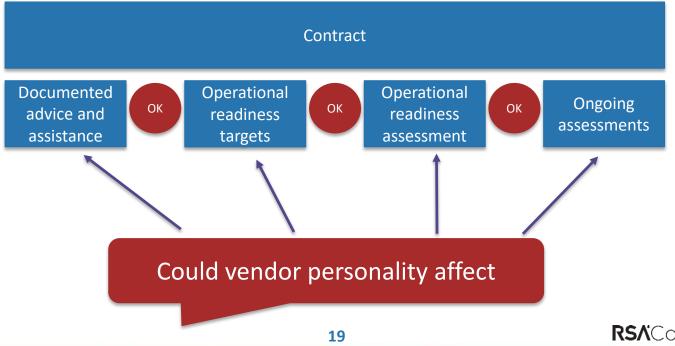
Intent to execute

Ignorant	Know
Unable	Able
Negative	Positive

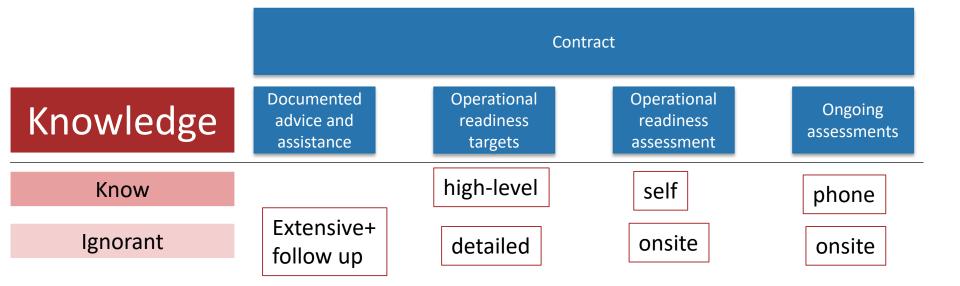


Knowledge	Ability	Intent		
Know	Able	Positive	KAP:	Dream supplier
Know	Able	Negative	KAN:	Deceivers
Know	Unable	Positive	KUP:	Frustrators
Know	Unable	Negative	KUN:	Theorists
Ignorant	Able	Positive	IAP:	<b>Dunning Krugers</b>
Ignorant	Able	Negative	IAN:	Bureaucrats
Ignorant	Unable	Positive	IUP:	Puppies
Ignorant	Unable	Negative	IUN:	Freddie Krugers



















Know	Able	Intend
Know	Able	Positive
Know	Able	Negative
Know	Unable	Positive
Know	Unable	Negative

Docs & assist	OR Targets	OR Assess	Ongoing
		Self	Self
	Detailed	Onsite	Onsite
		Onsite	Phone
	Detailed	Onsite	Continuous



Know	Able	Intend
Know	Able	Positive
Know	Able	Negative
Know	Unable	Positive
Know	Unable	Negative
gnorant	Able	Positive
gnorant	Able	$N_{\text{egative}}$
gnorant	Unable	Positive
gnorant	Unable	Negative

Docs & assist	OR Targets	OR Assess	Ongoing
		Self	Self
	Detailed	Onsite	Onsite
		Onsite	Phone
	Detailed	Onsite	Continuous
		Phone	Self
Extensive+ follow up	Detailed	Onsite	Onsite
	Detailed	Onsite	Phone
		Onsite	Continuous



Know	Able	Intend
Know	Able	Positive
Know	Able	$N_{\text{egative}}$
Know	Unable	Positive
Know	Unable	$N_{\text{egative}}$
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	Detailed	Onsite	Continuous
		Phone	Self
Extensive+ follow up	Detailed	Onsite	Onsite
		Onsite	Phone
		Onsite	Continuous



Know						
Know						
Know						
Know						
Remember, this is just a mode Continuous						
gnorant			,			
gnorant						
gnorant						
gnorant						



# SO HOW CAN YOU ASSESS A VENDOR'S PERSONALITY?

## Sniff test





## External Ratings (also sniff test)









But beware of ...

Know

Able

Negative

## **Ask Open Questions**



Make the vendor think

Demonstrate knowledge, ability or intent

Force deceitful declarations

Can not be completed by sales



Q. What do you see as the top three cyber threats to your business?



Q. How do you gain short-, mediumand long-term threat intelligence?



Q. What formal and informal informal information sharing networks are you members of?



Q. How many days of professional resource have been used in penetration testing and 'red team' tests or other similar assurance exercises in the past twelve months?



...What do you plan to do differently next year?



Q. How many people have more than 50% of their role allocated to cyber/information security responsibilities?



...Do you think this is enough?



Q. How many person-days have you estimated would it take a malicious external attacker to breach your defenses and gain privileged access to critical systems?



...How quickly would you detect this type of intrusion into your network?



...How many intrusions have you detected in the past twelve months?



Q. What are the RPO, RQO and RTO for the systems that support the service you provide to us?



... When you last did a test what RTO, RPO and RQO did you achieve?



Q. Have you formally appointed a Data Protection Officer (DPO)?

If so, who is this.



... If so, who is this ...



... and what are their qualifications ...



Q. What processes do you have in place to respond to Data Subjects who request their data in accordance with GDPR Article 15?



Q. How will you detect a 'Personal Data Breach'?

### What's interesting?



Non-answers

We have ISO27001 and our CISO is awesome answers

Long answers

### What's interesting?



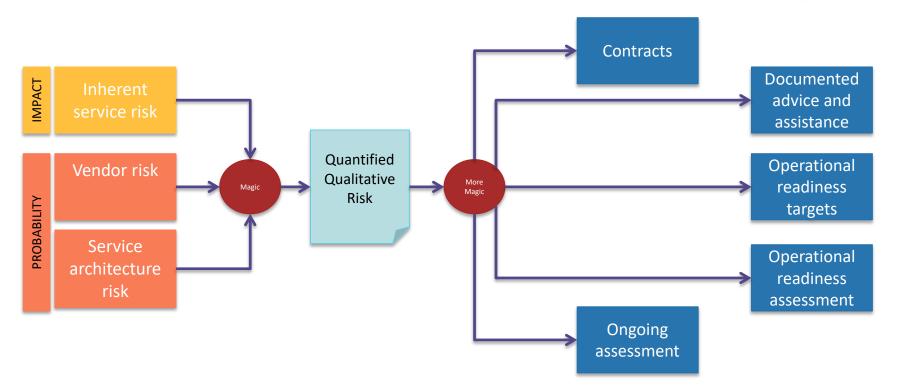
This is far too confidential

Everything is outsourced to XXX

No one asked us this before

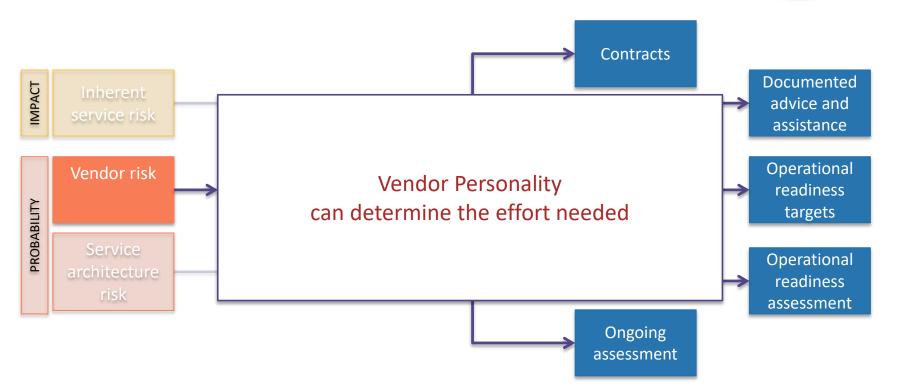
# Summary ...





# Summary ...





#### Taking this back to the office



- Isolate the levers (approaches) you use to gain supplier assurance
  - Do you use operational readiness targets
- Can you save resources by profiling suppliers?
  - This exercise is not free
- Would it save compliance-related activities?
- Try a sample questionnaire on some suppliers





### **QUESTIONS**

Or @withoutfire