

Privacy & Data Protection Risk Assessment

- Ensuring Compliance with GLBA, CCPA, and NIST Privacy Framework
- By: Gerria LeSure | GRC Consultant
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Understanding Privacy Risks in Insurance

Objective: Conduct a privacy & security risk assessment for State Farm.

Industry Focus:
Insurance (Auto,
Home, Life,
Business).

Regulations Applied:

GLBA (Gramm-Leach-Bliley Act) - CCPA (California Consumer Privacy Act)

- NIST Privacy Framework

The Business Impact of Privacy & Security Risks

Why This Matters for State Farm:

- Legal Fines & Compliance Violations: GLBA fines up to \$100,000 per violation.

- Data Breaches Affect Reputation: Insurance companies lose customer trust after breaches.

- Operational Downtime: Cybersecurity incidents cause service disruption & revenue loss.

Regulatory Compliance & Security Standards

- Framework | Key Requirement |
 Impact on State Farm
- GLBA | Protects consumer financial data | Enforce data encryption & access control
- CCPA | Consumers can request, delete, and opt-out of data sharing | Implement opt-out mechanisms & privacy requests
- NIST Privacy Framework | Best practices for data governance & security | Strengthen incident response & vendor security



Identified Data Protection & Security Gaps

- Top Privacy & Security Risks at State Farm:
- No encryption for sensitive customer data (GLBA violation).
- Employees have excessive access to PII.
- Third-party vendors handling PII aren't regularly audited.
- No structured incident response plan for data breaches.
- Lack of automated customer opt-out mechanism (CCPA violation).

Privacy Risk Prioritization – Likelihood & Impact



RISK | LIKELIHOOD (1-5) | IMPACT (1-5) | OVERALL RISK | RISK LEVEL



UNENCRYPTED CUSTOMER DATA | 5 | 5 | 25 | CRITICAL



EXCESSIVE EMPLOYEE PII ACCESS | 4 | 4 | 16 | HIGH



LACK OF VENDOR SECURITY AUDITS | 5 | 4 | 20 | HIGH



NO DATA BREACH RESPONSE PLAN | 5 | 5 | 25 | CRITICAL

How State Farm Can Improve Data Privacy & Compliance

Recommendations:

- Encrypt sensitive customer data (GLBA compliance).
- Limit access to PII using Role-Based Access Control (RBAC).
- Conduct vendor security audits annually.
- Develop a Data Breach Response Plan (NIST 800-61).
- Implement an automated opt-out mechanism for customers (CCPA compliance).

Final Recommendations & Roadmap to Compliance

- Key Takeaways:
- State Farm must strengthen privacy controls to remain GLBA & CCPA compliant.
- Implementing encryption, access controls, and vendor audits is critical.
- Next Steps:
- Encrypt all customer data.
- Limit employee data access (RBAC).
- - Develop a structured incident response plan.

References & Compliance Guides

- Additional Resources & Documentation:
- GLBA Compliance Guide: https://github.com/GerriaLeSure/Privacy-Data-Protection-Assessment/blob/main/Compliance_Guide s/GLBA_Guide.pdf
- CCPA Compliance Guide: https://github.com/GerriaLeSure/Privacy-Data-Protection-Assessment/blob/main/Compliance_Guide s/CCPA Guide.pdf
- For more details, visit the full report in the GitHub repository.

