January 13th, 2024

Security Audit Conducted by: Charles S. Duverglas

Botium Toys

Controls and compliance checklist

Boxed checked "Yes" indicates proper requirements are met. "No" indicates revision and swift correction is to be carried out. Please alert stockholders and properly authorized individuals immediately.

Yes	No	Control
☐	☑	Least Privilege
☐	☑	Disaster recovery plans
☐	☑	Password policies
☐	☑	Separation of duties
☑	☐	Firewall
☐	☑	Intrusion detection system (IDS)
☐	☑	Backups
☑	☐	Antivirus software
☐	☑	Manual monitoring, maintenance, and intervention for legacy systems
☐	☑	Encryption
☐	☑	Password management system
☑	☐	Locks (offices, storefront, warehouse)
☑	☐	Closed-circuit television (CCTV) surveillance
☑	☐	Fire detection/prevention (fire alarm, sprinkler system, etc.)

Compliance checklist

Payment Card Industry Data Security Standard (PCI DSS)

Yes	No	Best practice
☐	☑	Only authorized users have access to customers' credit card information.
☑	☑	Credit card information is stored, accepted, processed, and transmitted internally, in a secure environment.
☐	☑	Implement data encryption procedures to better secure credit card transaction touchpoints and data.
☐	☑	Adopt secure password management policies.

General Data Protection Regulation (GDPR)

Yes	No	Best practice
☐	☑	E.U. customers' data is kept private/secured.
☑	☐	There is a plan in place to notify E.U. customers within 72 hours if their data is compromised/there is a breach.
☐	☑	Ensure data is properly classified and inventoried.
☐	☑	Enforce privacy policies, procedures, and processes to properly document and maintain data.

System and Organizations Controls (SOC type 1, SOC type 2)

Yes	No	Best practice
☐	☑	User access policies are established.

☐	☑	Sensitive data (PII/SPII) is confidential/private.
☑	☐	Data integrity ensures the data is consistent, complete, accurate, and has been validated.
☐	☑	Data is available to individuals authorized to access it.

Risk description

At present, there exists a deficiency in asset management within our organization. Furthermore, it has come to our attention that Botium Toys lacks certain essential controls, potentially rendering it non-compliant with both U.S. and international regulations and standards.

Control best practices

The first of the five functions of the NIST CSF is Identify. Botium Toys will need to dedicate resources to identify assets so they can appropriately manage them. Additionally, they will need to classify existing assets and determine the impact of the loss of existing assets, including systems, on business continuity.

Risk score

On a scale of 1 to 10, the risk score is 8, which is fairly high. This is due to a lack of controls and adherence to compliance best practices.

Additional comments

The risk posed to assets or potential fines imposed by governing bodies is deemed to be significant, primarily due to Botium Toys' inadequate implementation of necessary controls and failure to fully comply with compliance regulations aimed at safeguarding critical data. Review the following bullet points for specific details:

- Currently, all Botium Toys employees have access to internally stored data and may be able to access cardholder data and customers' PII/SPII.
- Encryption is not currently used to ensure the confidentiality of customers' credit card information that is accepted, processed, transmitted, and stored locally in the company's internal database.

- Access controls pertaining to least privilege and separation of duties have not been implemented.
- The IT department has ensured availability and integrated controls to ensure data integrity.
- The IT department has a firewall that blocks traffic based on an appropriately defined set of security rules.
- Antivirus software is installed and monitored regularly by the IT department.
- The IT department has not installed an intrusion detection system (IDS).
- There are no disaster recovery plans currently in place, and the company does not have backups of critical data.
- The IT department has established a plan to notify E.U. customers within 72 hours if there is a security breach. Additionally, privacy policies, procedures, and processes have been developed and are enforced among IT department members/other employees, to properly document and maintain data.
- Although a password policy exists, its requirements are nominal and not in line with current minimum password complexity requirements (e.g., at least eight characters, a combination of letters, and at least one number; special characters).
- There is no centralized password management system that enforces the password policy's minimum requirements, which sometimes affects productivity when employees/vendors submit a ticket to the IT department to recover or reset a password.
- While legacy systems are monitored and maintained, there is no regular schedule in place for these tasks, and intervention methods are unclear.
- The store's physical location, which includes Botium Toys' main offices, storefront, and warehouse of products, has sufficient locks, up-to-date closed-circuit television (CCTV) surveillance, as well as functioning fire detection and prevention systems.