



# Cybersecurity Program Proposal



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PRESENTED TO  
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# Business Objective



## Data Security

Protect essential assets and reduce risk



## Business Continuity

Ensure operational resilience for critical business functions



## Regulation Compliance

Comply with industry specific regulations

GDPR | HIPAA | CCPA | EU AU Act



## Increase Automation

Improve efficiency and decrease intensive process

# Security Plan Objectives



Data Security



Establish strong and resilient security posture that safeguards organization's assets, while enabling business growth



Regulation Compliance



**Protect Sensitive Data**



Business Continuity



**Mitigate Cyber Threats**



Increase Automation

**Foster Security-Conscious Culture**

**Enhance Security Posture**



# Risk Identified

## 01 Regulatory Compliance

Non-compliance to data protection laws and industry specific regulations

## 02 Third Party + Cloud

Security risks associated with third party vendors and cloud service providers

## 03 Asset Management

Security vulnerabilities and poor process of identifying, classifying, and protecting assets

## 04 Artificial Intelligence

Security risks from internal (model vulnerabilities) and external sources abusing the model



# Risk Assessment – High Priority

ID NO.	RISK or HAZARD DESCRIPTION	RESOURCES IMPACTED	PROBABILITY LEVEL	IMPACT LEVEL	PRIORITY VALUE
<b>Regulation Requirement</b>					
1	Data Privacy (regulatory non-compliance)	<ul style="list-style-type: none"> <li>- Financial Loss (fines, legal fees)</li> <li>- Company Reputation (customer trust/loyalty)</li> <li>- Customer Data (PHI and PII)</li> </ul>	High ▾	High ▾	9
2	Data Retention and Destruction (regulatory non-compliance)	<ul style="list-style-type: none"> <li>- Financial Loss (fines, legal fees)</li> <li>- Operational Efficiency</li> </ul>	High ▾	High ▾	9
<b>Third Party + Cloud</b>					
3	No vendor risk management	<ul style="list-style-type: none"> <li>- Company Reputation</li> <li>- Data (PHI and PII)</li> <li>- Financial Loss (legal fees, loss of business)</li> </ul>	High ▾	High ▾	9
4	Supply Chain Attack (Vendor Compromise)	<ul style="list-style-type: none"> <li>- Data (PHI and PII)</li> <li>- Operations</li> <li>- Financial Loss</li> </ul>	Medium ▾	High ▾	6
5	Supply Chain Disruption	<ul style="list-style-type: none"> <li>- Data (PHI and PII)</li> <li>- Operations</li> <li>- Financial Loss</li> </ul>	Medium ▾	High ▾	6
6	CSP Vulnerabilities (like misconfigurations)	<ul style="list-style-type: none"> <li>- Data (PHI and PII)</li> <li>- Technology (applications and systems)</li> </ul>	Medium ▾	High ▾	6
7	CSP Breach	<ul style="list-style-type: none"> <li>- Data (PHI and PII)</li> <li>- Technology (applications and systems)</li> <li>- Company Reputation</li> <li>- Financial Loss</li> </ul>	Medium ▾	High ▾	6

# Risk Assessment – High Priority

ID NO.	RISK or HAZARD DESCRIPTION	RESOURCES IMPACTED	PROBABILITY LEVEL	IMPACT LEVEL	PRIORITY VALUE
<b>AI</b>					
8	AI Fairness	- Financial Loss (fines, legal fees) - Company Reputation (customer trust/loyalty) - Operational Efficiency	Medium ▾	High ▾	6
9	Privacy Violations (AI)	- Regulatory Compliance - Company Reputation (customer trust/loyalty)	Medium ▾	High ▾	6
10	Model Bias (AI)	- Regulatory Compliance - Company Reputation (customer trust/loyalty) - AI Model Accuracy	Medium ▾	High ▾	6
11	Model Exploitation and Manipulation (AI)	- AI Model Accuracy - Company Reputation (customer trust)	Medium ▾	High ▾	6
<b>Asset Management</b>					
12	Lack of Structured Risk Management	- Data (PHI and PII) - Operations - Technology (applications and systems)	Medium ▾	High ▾	6
13	Legacy Applications/Systems	- Data (PHI and PII) - Operations - Company Reputation	Medium ▾	High ▾	6
14	Data Breach	- Financial Loss (fines, legal fees) - Company Reputation (customer trust/loyalty) - Customer Data (PHI and PII)	Medium ▾	High ▾	6
15	Data Loss	- Financial Loss (fines, legal fees) - Company Reputation (customer trust/loyalty) - Customer Data (PHI and PII)	Medium ▾	High ▾	6



# Solution – Policy and Procedures



## Access Control

- Enhance data confidentiality
- Reduce unauthorized access

Implementations include:  
MFA, PoLP, RBAC, IAM

## Data Protection

- Enhance data integrity
- Prevent data loss

Implementations include:  
Data Retention and Destruction,  
Data Encryption, Regular Audits

## Incident Response

- Faster incident detection
- Reduced downtime

Implementations include:  
Communication Procedures,  
Monitoring and Detection

## Risk Management

- Prioritize risk mitigation
- Proactively identify threat/risk

Implementations include:  
Risk Monitoring, Threat Modeling,  
Regular Assessments

## Vendor Management

- Reduced supply chain risks
- Secure third-party relationship

Implementations include:  
Vendor Assessment, Continuous  
Monitoring

## Security Awareness

- Improved security culture
- Reduce human error

Implementations include:  
Employee Training, Tabletop  
Exercise, Phishing Simulations





# Solution – Security Controls



## Network

- Enhance confidentiality
- Reduce risk of breach

Implementations include:  
IDS/IPS, NAC, Firewall

## Application

- Ensure data protection
- Protect from attacks

Implementations include:  
WAF, Input Validation, Output  
Encoding, PenTesting

## AI Model

- Privacy preservation
- Protect from attacks

Implementations include:  
Adversarial Training, Version Control,  
Fairness and Bias Testing

## Cloud

- Ensure data protection
- Maintain compliance

Implementations include:  
DLP, CSPM, Data Encryption





# Roadmap



# Milestones Year 1

**Risk Reduction: ~30%**

Unauthorized Access

Data Breaches

Network Attacks

Human Error

Q1

Implement IAM

Begin implementing RBAC and PoLP principles

Conduct security awareness training for all employees

Q2

Complete RBAC and PoLP principles

Implement data retention and destruction policies and procedures

Conduct phishing simulation exercise

Implement MFA for all user accounts

Q3

Implement data encryption for data at rest and in transit

Implement patch management to address vulnerabilities promptly

Q4

Deploy network security controls (firewalls, IDS/IPS)

Implement NAC

Conduct tabletop exercise to test incident response procedures

Establish communication procedures for an incident response

# Milestones Year 2

**Risk Reduction: ~40%**

Cloud Security Vulnerabilities  
Third-Party Risks  
AI Model Bias and Vulnerabilities  
Data Loss and Exposure  
Web Application Attacks

Q1

Deploy WAF to protect Web Application

Implement input validation and output encoding controls for applications

Conduct vulnerability assessment and penetration testing (VAPT)

Q2

Conduct security awareness training

Implement CSPM to monitor cloud security posture

Implement DLP

Establish regular AI fairness and bias testing

Q3

Implement AI model security controls (transparency, version control and adversarial training)

Implement regular risk assessment and monitoring process

Implement vendor risk management program (vendor assessments)

Q4

Develop and implement comprehensive incident response plan (IR) + business continuity and disaster recovery plan (BCDR)

Conduct full security audit to assess overall security posture

Conduct a compliance audit

# Milestones Year 3

**Risk Reduction: ~30%**

Regulatory Non-Compliance

Zero-Day Exploits

Advanced Persistent Threats

Ineffective Security Controls

Q1

Enhance incident response capabilities (improved monitoring and detection tools)

Conduct red team + blue team exercises to test security defenses

Q2

Implement advanced threat protection technologies, including Endpoint detection and response (EDR)

Conduct security awareness campaign focused on emerging threats

Q3

Review and update security policies and procedures based on evolving threats and regulations

Conduct security audit for implemented controls effectiveness

Q4

Conduct final security audit and review the overall security posture

Conduct a compliance audit

[illegible]



Technology Policy Process

## Year 2 Timeline

		Q1			Q2			Q3			Q4		
Application Security	WAF												
	Input Validation + Output Encoding												
Security Training	Security Awareness Training												
Data Protection	DLP												
AI Security	Regular AI Fairness and Bias Testing												
	AI Model Security Controls												
Risk Management	VAPT												
	CSPM												
	Regular Risk Assessment + Monitoring												
	Vender Risk Management Program												
	Compliance Audit												
	Security Audit												
Incident Response and Business Continuity	IR Plan												
	BCDR Plan												



## Year 3 Timeline

		Q1	Q2	Q3	Q4
Incident Response and Business Continuity	IR Plan	■	■		
	BCDR Plan	■	■		
Network Security and Infrastructure	Red Team + Blue Team Exercise		■		
	Enhance Incident Response	■	■	■	
	Advanced Threat Protection			■	■
Security Training	Security Awareness Campaign			■	■
Compliance Audit	Security Policies/Procedures			■	■
	Security Audit				■
	Compliance Audit				■
	Final Security Audit				■

# Anticipated Challenges

Challenge	Mitigation Strategies
Technical Complexity	<ul style="list-style-type: none"><li>- Ensure compatibility between tools</li><li>- Conduct small scale to test new technologies before full deployment</li><li>- Hire external consultants such as security experts/consultants</li></ul>
Regulatory Compliance	<ul style="list-style-type: none"><li>- Stay updated on regulatory changes and adjust as needed</li><li>- Engage with legal and compliance experts</li><li>- Conduct regular audits to assess compliance</li></ul>
Emerging Threats	<ul style="list-style-type: none"><li>- Stay informed and updated on latest security trends/threats</li><li>- Conduct regular security assessments</li></ul>
Employees Resistance to Change	<ul style="list-style-type: none"><li>- Clear communication behind change reasons</li><li>- Provide training to help employees understand security measures</li><li>- Roll out changes gradually to minimize disruption</li></ul>



# Feedback Loop

## Security Committee Meetings (Quarterly)

Ensure security measures are held to standard and decisions are made in timely manner

## Metrics and KPI Reviews (Quarterly/Annually)

Assess the overall progress the security program in a timely manner

## Security audits and assessments (Biannual)

Assess effectiveness of security controls and measure compliance

## External Security Assessments (Annually)

Validate effectiveness of internal security controls and assess security posture from a different perspective

# KPIs

Security Posture		Security Awareness		Operational Efficiency		Incident Response + Business Continuity	
Quarterly							
Vulnerability Assessment	Measure the number of critical vulnerabilities	Phishing Simulation Success Rate	The percentage of employees who click on phishing links	Security Tools Utilization	Measure the usage and effectiveness of security tools	Mean Time To Detect (MTTD)	Measure time taken to detect a security incident
				Risk Mitigation Effectiveness	Measure the percentage of identified risks that are mitigated or transferred	Mean Time To Respond (MTTR)	Measure efficiency of incident response team in resolving incidents alerts
Annual							
Compliance Adherence	Measure compliance with relevant regulations and industry standards	Employee Security Behavior	Measures employee adherence to security policies and procedures	Budget Utilization	Measure efficiency of budget allocation	Disaster Recovery Time Objective (RTO)	Measure time taken to restore critical systems and services after a disaster
				VAPT Findings	The amount and severity of vulnerabilities identified	Disaster Recovery Point Objective (RPO)	Measure the amount of data loss tolerated

# Budget and Resources Allocation

## Software ~ \$3M

For needed software and licensing fees for security software, tools, and platforms

## Hardware ~ \$1.5M

For purchasing and maintenance of security hardware, including servers, network devices, and security applications

## Training ~ \$1M

For training for awareness and security best practices for employees

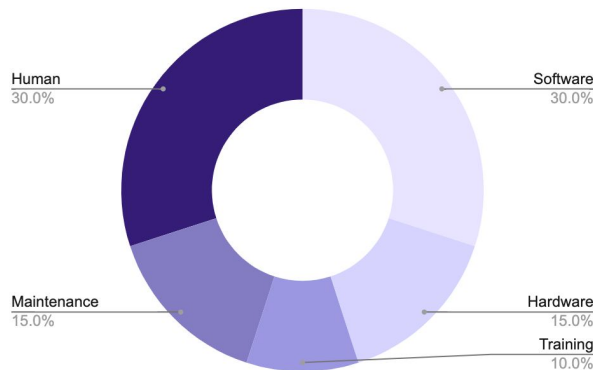
## Maintenance ~ \$1.5M

For ongoing maintenance including security consulting services, and operational costs

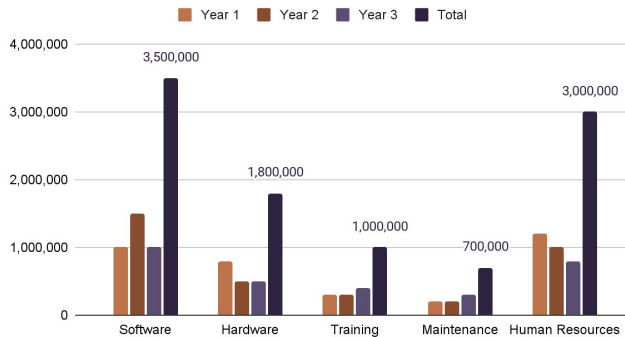
## Human Resources ~ \$3M

For employment of security team and external experts such as auditors, consultants, and pentesters

Resource Allocation



Resource Allocation



# Internal VS External Budget

## Internal ~ \$7.5M (75%)

For employment and maintenance of security team

## External ~ \$2.5M (15%)

For external security consultants, penetration testing services, and other specialized experts

### Year 1

High allocation to internal resources to build core security team and invest in initial training while leveraging external resources for specialized expertise.

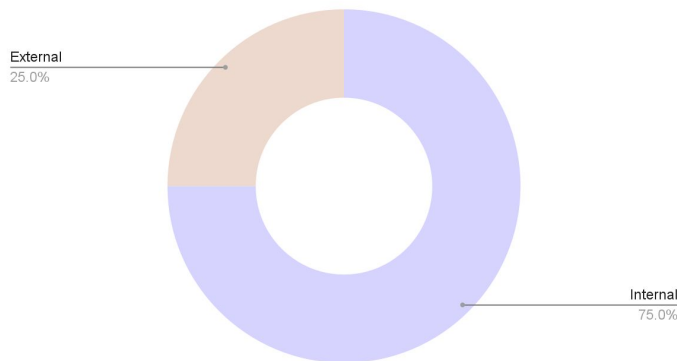
### Year 2

Lower allocation to internal resources needed due to investing in advanced security technology and using external resources for specialized expertise and consulting services.

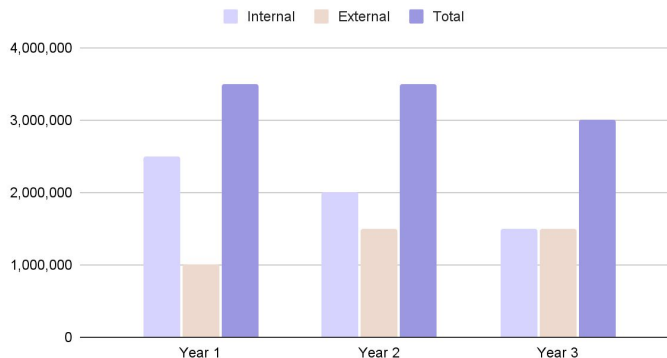
### Year 3

Balance between internal and external resources due to organization effectively managing security programs in place and being able to mitigate risks while leveraging external resources for ongoing assessments and emerging technologies

Internal VS External Resources



Internal and External



# Conclusion

This security program outlines a comprehensive approach to enhancing Lemonade's security posture.

By meeting these security objectives, Lemonade will be able to protect its critical assets, maintain regulatory compliance, and support its business growth.

## Objective Alignment

- Protect sensitive data
- Adherence to industry regulations/standards
- Comprehensive incident response and business continuity plan
- Foster security-conscious culture
- Enhance security posture
- Mitigate cyber threats
- Continuous improvement