Issue ID:

IS-0002722

Issue Name:

Minimum third-party and privacy standards were not executed resulting in inadequate information

security controls to prevent inappropriate access to customer information by internal or external parties.

Root Cause Explanation:

The root cause can be attributed to both various VEM and organizational changes occurring over the past few years, which over time has impacted clarity regarding the applicable ongoing

monitoring standards. Also, during the vendor onboarding process (2018) appropriate SaaS configuration was not performed.

Issue Rating:

Medium Repeat Issue: No

Status: Open Issue Target Date: October 31, 2024

Operating Division:

US Businesses

Risk Category:

8. Information Security

Risk Sub-Category:

8.1 Unauthorized Data Access

Root Cause Category:

Process