## 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