

Who is FINRA?

- · Financial Industry Regulatory Authority.
- Our Mission: "Investor Protection—Market Integrity."
- We are a private sector not-for-profit organization authorized by Congress to protect America's investors.
- · We do this by:
 - Writing and enforcing rules that govern the activities of 3,800 broker-dealers with 634,000 brokers.
 - · Examining firms for compliance with those rules.
 - Fostering market transparency.
 - Educating investors.

And most significant to this discussion:

 FINRA uses big data and data science technologies to detect and analyze fraud, market manipulation, and insider trading across US capital markets.

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FINRA Technology

Innovating

to protect investors and ensure market integrity





Market reconstruction containing

TRILLIONS

of nodes and edges



Up to 75 BILLION BUY events per day SELL





4 years **ARCHIVAL** storage



Session takeaways

- · Learn to be realistic in your risk assessment of using the cloud.
- · Learn about Amazon Web Services and its foundational security controls and practices relevant to safeguarding your big data workloads.
- See how FINRA securely enables our data scientists, and other big data projects, in AWS by achieving a balance between productivity and security.

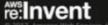




Data science needs Data discovery and exploration.

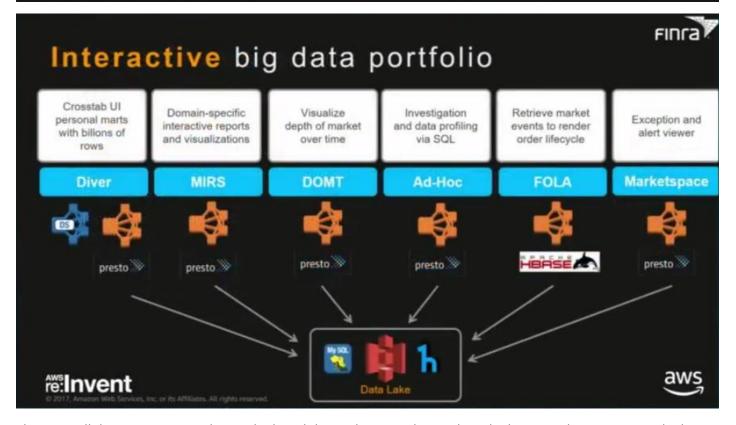
- Bring disparate sources of data together.
- · Semantic understanding of the data sets.
- Ease of use: Enable users without having to understand underlying data infrastructure.
- Safeguard information with a high degree of security and least privileges access.
- Model migration from research to prototype to production.
- Avoid time spent on environment administration.





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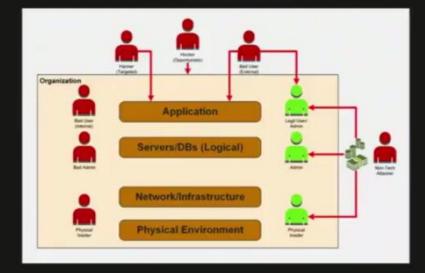




These are all the query engines that we built and the applications that we have built on top the engines. We built our own data lake (~25 Petabytes) using S3, we also have our OSS data catalog called Herd that helps store the metadata about our data including all previous data history. We generally use Presto (and HBase) to query the data lake from the many apps we build.



Threat sources: Private data center



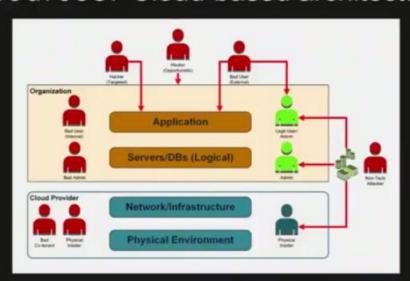
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There are security needs for big data.

Threat sources: Cloud-based architecture



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Evaluating the risk

Key factors

Compare risk of alternatives

- · Cloud vs. legacy data center
 - The "idealized zero-risk scenario" is unrealistic.
 - · Legacy data centers have risk!

Evaluate risk in context

- · "Cloud" risks get the most press.
- · Many existing risks are unchanged by adoption of cloud.
- Many existing risks are significantly "riskier" than new "cloud" risks.
- The "unknown" creates a powerful perception of risk.

Cybersecurity is only one dimension of risk

· Operational, legal, and opportunity risks as well



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Shared responsibility model plus

Security "ABOVE" the cloud

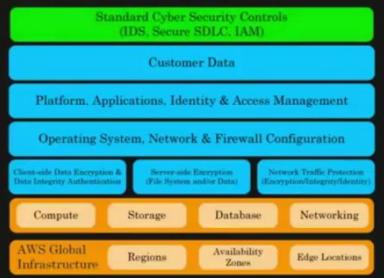
 All the security controls you're already using.

Security "IN" the cloud

 Controls to supplement Cloud Service Provider (CSP) controls.

Security "OF" the cloud

 CSP provides these controls.
 Customer due diligence through third-party risk management.







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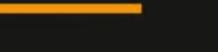
Foundational security controls

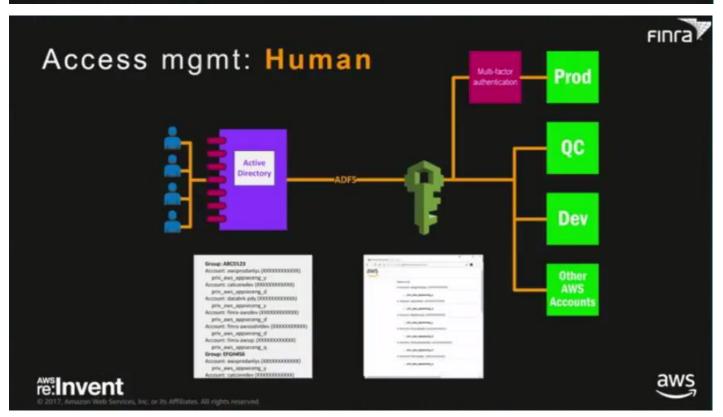
- · AWS security best practices
- Access management
 - Authentication
 - Authorization/Separation of Duties (SoD)
 - · Policy enforcement and oversight
- · Logging/monitoring/alerting/UEBA
 - Controls for Economic DoS
- · Network architecture
- · Encryption and Key Management (KMS)
- Governance

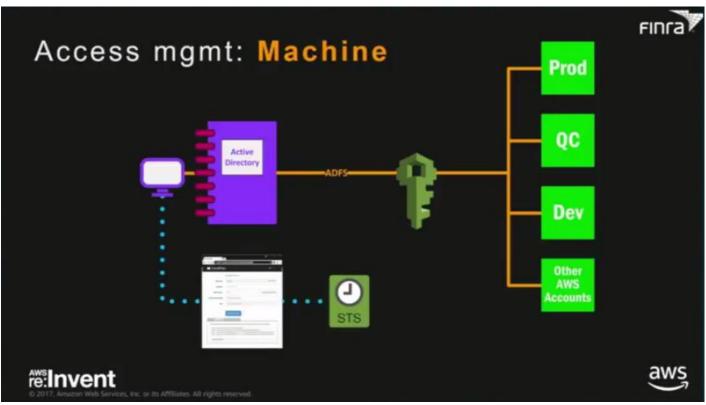


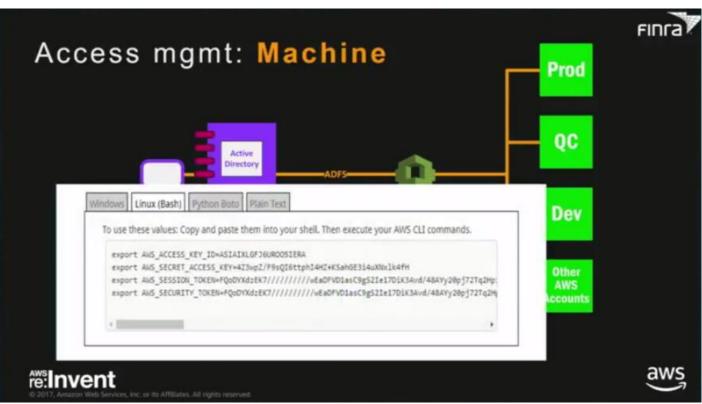


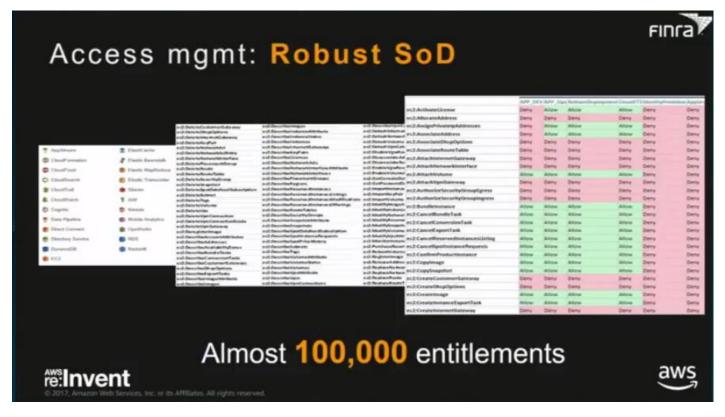
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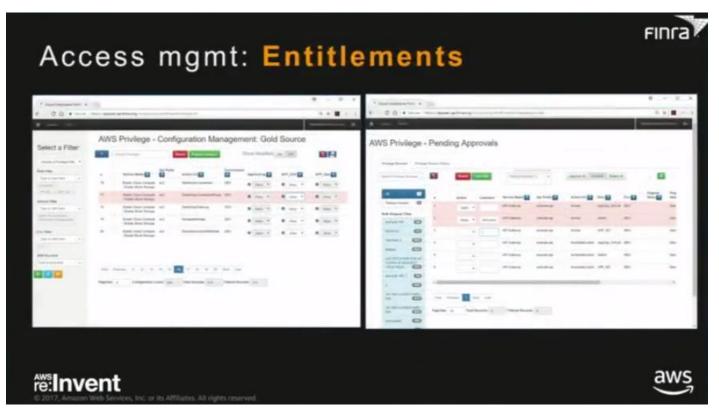


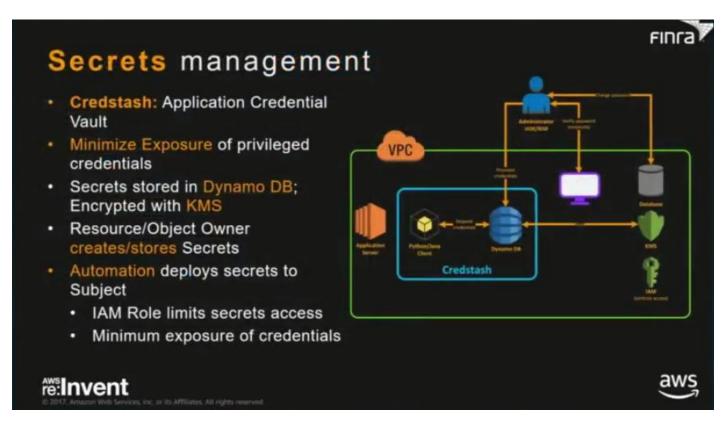




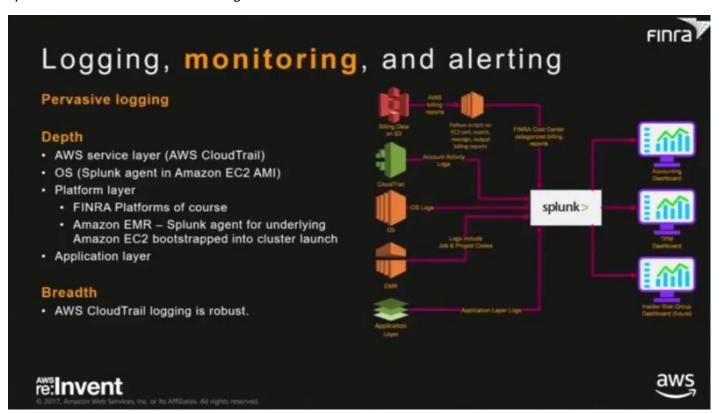


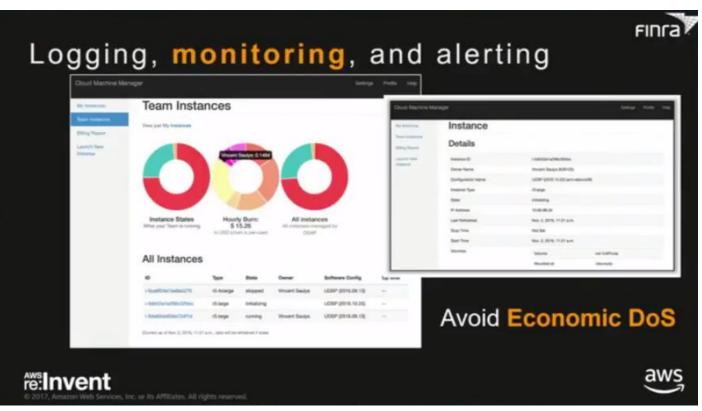
We have access granted by roles per environment. No IAM role has Delete role on Production assets like S3 buckets or EC2 instances. We follow the principle of least entitlement where an individual is given the minimum set of role entitlements that they need to get the job done.

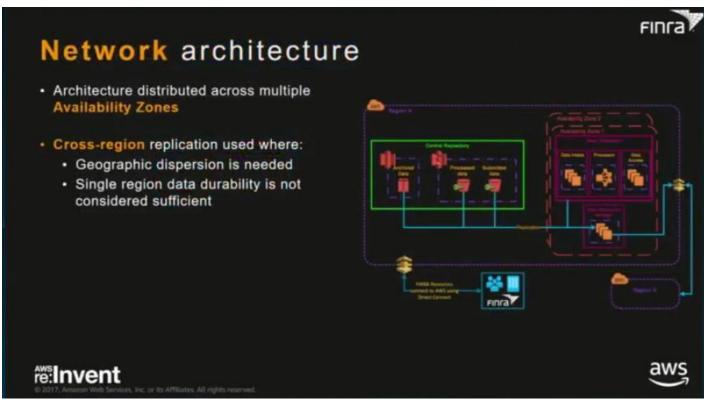




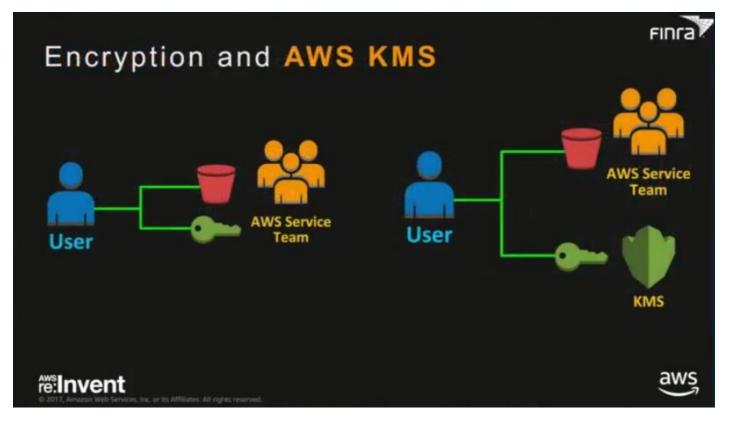
We use an OSS application credential vault called Credstash that implements KMS encryption of the secrets and stores them in DynamoDB. The resource (DB admin) creates the secrets and passwords, they store it in Credstash, automation on the user's system (Python or Java client) pulls those secrets at deploy time without human intervention, the target system is IAM role restricted for seeing the credentials.



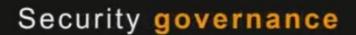




This is a sample deployment architecture we use at FINRA, we use up to 4 AZs.



We use SSL in-transit encryption with all the AWS service endpoints we have, we also use encryption at rest and S3 and KMS encryption.



Security controls must comply and enhance the organization's overall governance policies.

FINRA Cybersecurity has a uniform process for creating and updating governance policies and standards.

FINRA Cybersecurity governance policies and standards are approved and monitored by

- Cloud Compliance Working Group (CCWG)
- Infrastructure Security Posture Review
- · Information Security Steering Committee







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Securing the services—Amazon EC2

AMI updates

- · Created at least monthly
 - Plus out-of-cycle for critical security patches
- Start: Latest Amazon AMI
- Harden: Remove unneeded packages, update remaining packages (security patches) [Yum], apply compliance modules [Puppet]
- Extend: Install common tools (AWS CLI, Puppet agent, Splunk agent, Trend Micro agent, etc.);
- Snapshot new AMI.

Security Groups

- · Goals:
 - · Narrowly crafted (microsegmentation),
 - · Policy of least privilege,
 - · Separation of Duties
- Challenges: Many groups to manage!
- Solution: FINRA Portus

Strictly Limited Access

- Goal: No access to production.
- Reality: Occasional prod access may be needed
- Modified Goals: Temporary, just-in-time access
 - · Restricted by IAM Role, AWS Tag
 - · Approved and Logged
- · Solution: FINRA Gatekeeper



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Security group mgmt: Portus

FINRA-developed Centralized Security Groups Management tool for Developers and the FINRA Cyber & Information Security Department

- Cyber & Information Security DEFINE security policies
- Developers SELF MANAGE AGS security groups
- Maximizes FLEXIBILITY for developers
- SIMPLIFIES administration for InfoSec

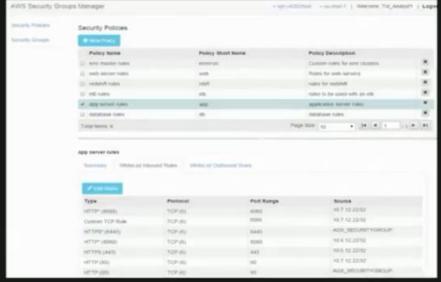








Portus dashboard

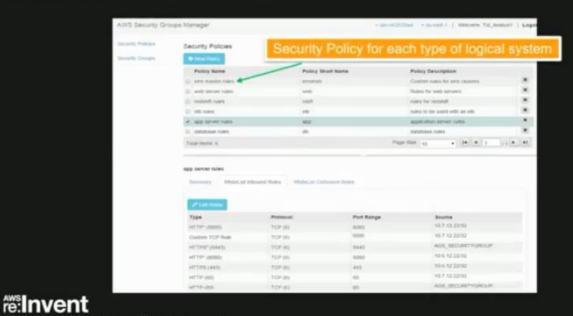


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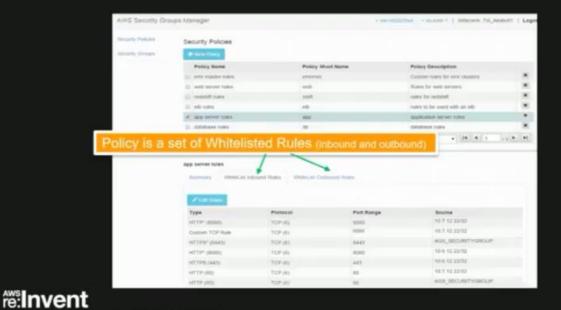
Portus dashboard



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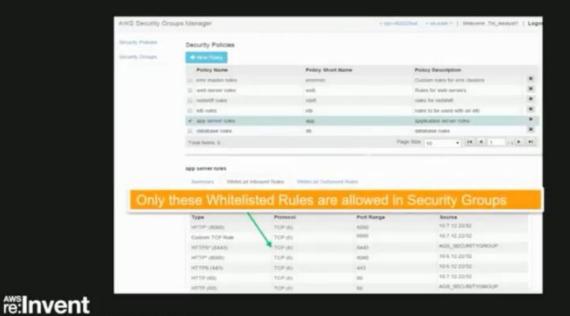
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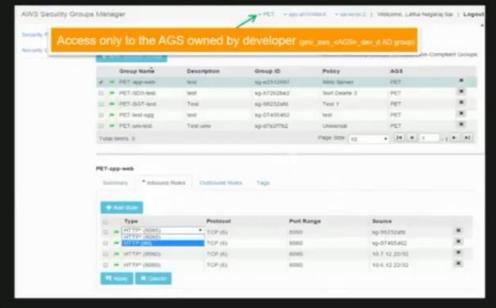
Portus dashboard







Portus developer dashboard



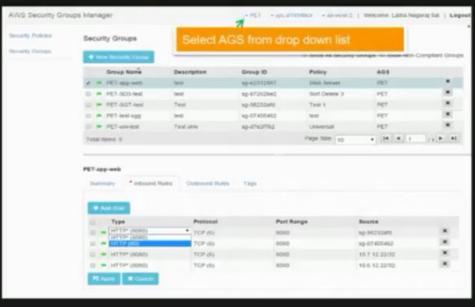


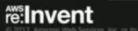
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Portus developer dashboard

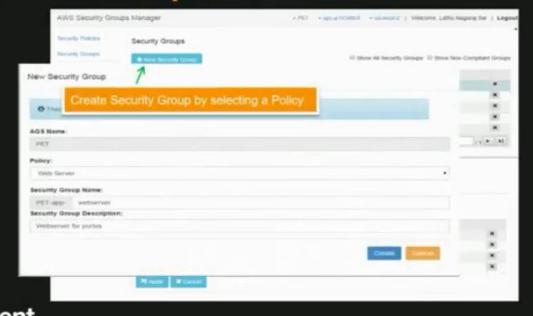




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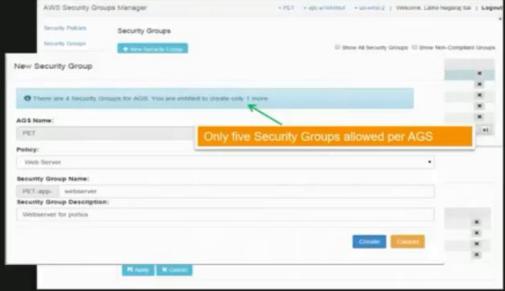
Portus developer dashboard





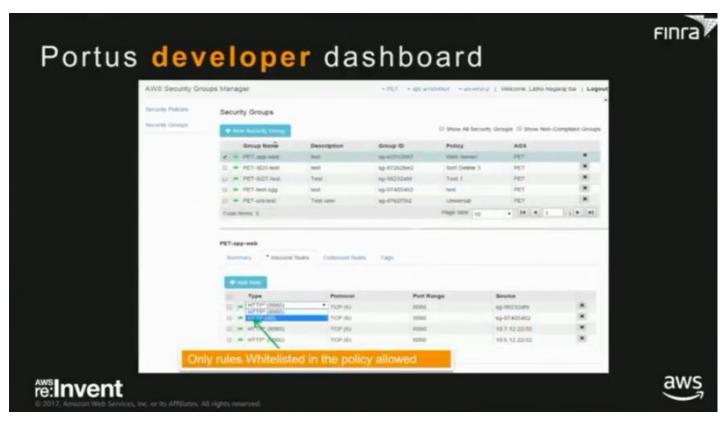
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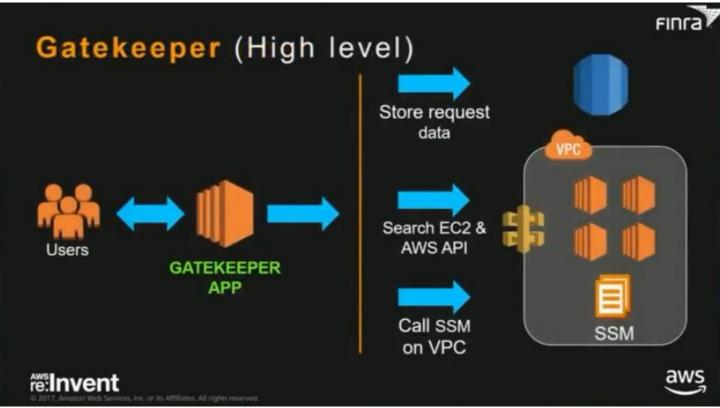
Portus developer dashboard



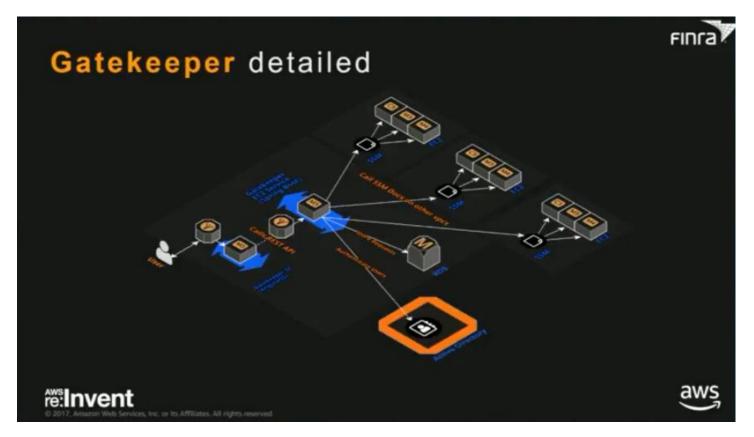
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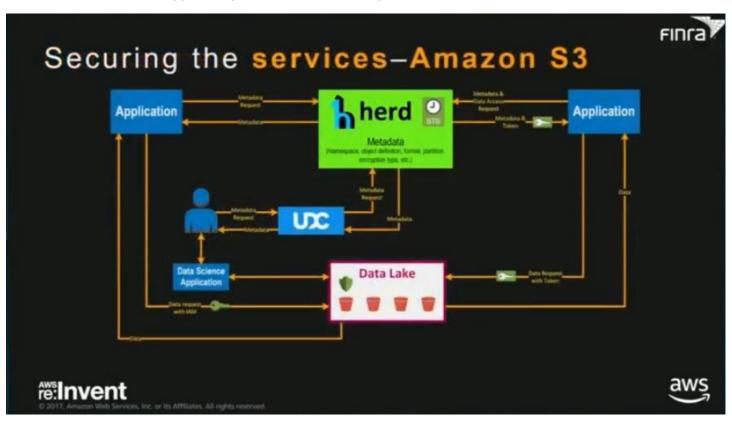




Gatekeeper is another system that we built that allows that Just in time, limited production environment access to an EC2 instance.



This further minimizes the opportunity for credentials to be exposed.



The Herd system helps us to manage access to the information to the data lake in S3, it uses metadata about the data like namespace, object definition, format, partition, encryption type, etc.



Securing big data services-Amazon EMR

- AWS::EMR::SecurityConfiguration
- · At-rest encryption
 - Local volumes (LUKS), HDFS encryption
- · In-transit encryption
 - Inter-node: Spark/Presto/Hive (TLS). HBase in 2018?
 - EMR-S3: EMRFS/TLS

- Logging–Splunk agent in bootstrap:
 - JobCode ID, project code logged
- Access Controls
 - No access to underlying cluster. (App layer AuthN/AuthZ)
 - Gatekeeper for admin access (rare)





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Securing the architecture

Data sanitization

- One-way hash/tokenization
 Preserves ability to associate related records by the sensitive data element, search on tokenized values
- Format-preserving encryption
 Preserves ability to associate related records, some limited ability to operate on data (search, sort, categorize)
- · Generalization, subsetting
- · De-identification
 - · Be wary of re-identification strategies

Limit Credential Exposure

- · IAM Role-based access is ideal
- Secrets Management (Credstash)

Make Security Easy

- Internal mirrors of external resources preserves isolation
- Empower users, managers with utilization/cost information, necessary entitlements to provide oversight.







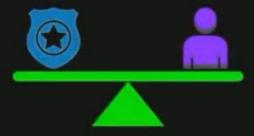
Striking a balance

Security

- The same security policies apply to all systems within the organization.
- Risks must be identified and mitigated.
- Sufficient controls need to be in place to protect the work being done.

Productivity

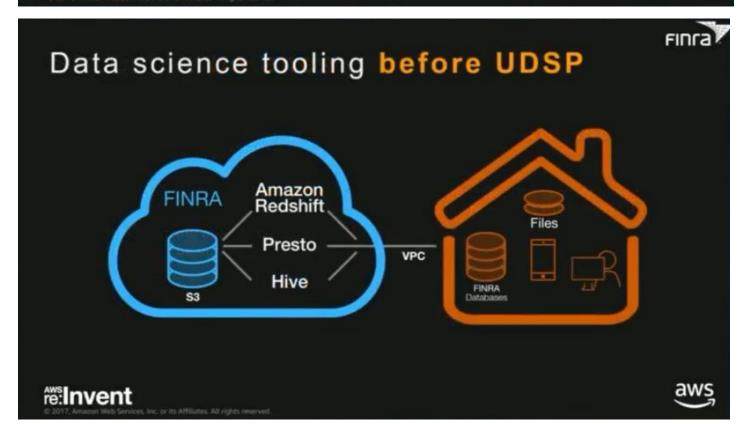
- Security should not get in the way of getting the work done.
- When possible, use security tools to make doing the right thing the easiest thing.



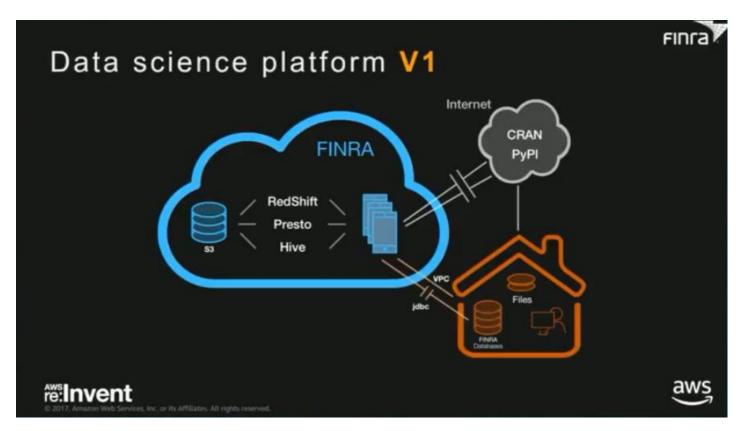
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We moved all our data into S3 and provide access to it through the various SQL engines like Redshift, Presto, Hive, and added access to on-premise data in databases and files via the VPC.



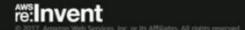
We now move the compute into the cloud by providing EC2 instances with the SQL engines for querying and working with the S3 data using some Python libraries.

Security & productivity collide

Users were fine if they only needed what the system provided. Users, unfortunately, may NEED to add packages/libraries.

How did one add new packages/libraries with V1?

- · The official way
- 1. Put in a request to Technology
- 2. Technology downloads, builds, and bundles into next release
- 3. Available when a release deploys
- · The unofficial way
- 1. Download package to local machine
- 2. Upload to cloud
- 3. Build and install to instance





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What went wrong?

Needs driven by technology

- · IT: Reduce costs
- · Users: Need more compute

Secure but inflexible

- · Local machines were more flexible
- · Install any package and experiment

Data availability

· On-premises databases not reachable

Setup still required

· Driver configuration to connect to databases

Technology in the way

· Technology required to install any new package



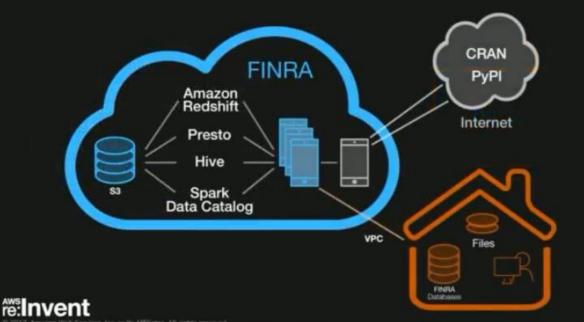


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Universal Data Science Platform







What went right?

Completely self service, no Technology administration

Users select UDSP version and machine capacity

Users associated to groups

- Users manage their instances
- AWS billing tags and machine selection choices to group

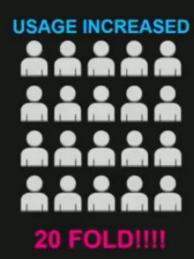
Create, stop, terminate (delete)

Managers can administer their teams' instances

Dashboard to monitor resource usage

· Stop instances from the dashboard

Reports for historical usage





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Recap

- Be realistic in your risk assessment. The security risks in using your own data center are equal to or more than going to the cloud.
- Use of strong foundational cloud security controls is paramount.
- AWS provides controls which, when properly applied, balance productivity and security.









Related FINRA presentations

2017 re:INVENT

SID326 - AWS Security State of the Union

Steve Schmidt, chief information security officer of AWS, addresses the current state of security in the cloud. As part of this presentation, John Brady (CISO of FINRA) shares the FINRA journey to the cloud. Wednesday, Nov 29, 12:15 p.m. – 1:15 p.m. MGM, Level 3, Premier Ballroom 316

FSV307 - Capital Markets Discovery: How FINRA Runs Trade Analytics and Surveillance on AWS

The FINRA analytics platform unlocks the value in capital markets data by accelerating trade analytics and providing a foundation for machine learning at scale. Monday, Nov 27, 10:45 a.m. – 11:45 a.m. Venetian, Level 5, Palazzo P

ENT328 - FINRA's Managed Data Lake: Next-Gen Analytics in the Cloud

The Financial Impact Regulatory Authority (FINRA) Technology Group has changed its customers' relationships with data by creating a managed data lake Thursday, Nov 30, 1 p.m. – 2 p.m. MGM, Level 3, Premier Ballroom 319

DEV335 - Manage Infrastructure Securely at Scale and Eliminate Operational Risks

Managing AWS and hybrid environments securely and safely while having actionable insights is an operational priority and business driver for all customers. Thursday, Nov 30, 4 p.m. – 4 p.m. Venetian, Level 2, Venetian E

2016 re:INVENT

BDM203: Building a Secure Data Science Platform on AWS





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