



Third Party Security Risk Mitigation Agent & Agency Relationships

Purpose

An assessment of the information privacy and security risks arising out of Citizens' agent and agency relationships. The objective is to identify and evaluate risks associated with non-public personal information (NPI) relating to Citizens transactions that is either accessible by agents using Citizens' systems or that agents store on their own systems. The assessment will include an evaluation of and recommendations for improving Citizens' strategy to minimize risks arising from Citizens' agent and agency relationships.

Status

- The agency and agent appointment agreements are being updated to incorporate recommendations.*
 - They were presented at the January Agent Roundtable and to Florida's top five agent associations for feedback.
 - Updated agreements are scheduled to be submitted to the Board of Governors (BOG) at the March 16, 2016 meeting. The BOG materials will include the following:
 - Presentation with overview of project history, current status, and a high-level communication and education plan
 - Agency and Agent Appointment Agreements (Exhibit 1: Information Security requirements)
- Completed review to determine the need to collect items of protected information for recommendation 5.

Next Steps

- Develop communication and education program to cover the new requirements in the agreements, mandatory cyber education and CSR credentialing – all recommendations
- Develop Self-Assessment Strategy – recommendations 6, 7 & 8
- Implement Producer Management Platform (PMP) in April 2016 – recommendation 2

*Recommendations shown on next slide

Recommendations

Recommendations	
<i>Priority Actions Citizens Should Require Agents and Agencies to Take</i>	
1	Adopt additional revisions to Agent Appointment Agreement and Agency Agreement to enhance privacy and security obligations and indemnity obligations
2	Require individual passwords for each agent and other staff who access Citizens' systems
3	Tighten procedures for prompt action when user leaves an agency
4	Require agencies to institute remote access controls to their internal IT systems (recommend)
5	Continue ongoing review of need to collect items of protected information
<i>Due Diligence Procedures</i>	
6	Require agency principals to learn how their IT systems operate –accomplish thru self-assessment
7	Require agencies to respond to a self-assessment questionnaire and security due diligence review at Citizens' request
8	Develop risk-based criteria for requesting a due diligence review –accomplish thru self-assessment
<i>Measures Citizens Should Consider Recommending to Agents/Agencies</i>	
9	Written Information Security Program –Requirement in agreement/part of education platform
10	Cyber liability insurance coverage –Part of education platform
11	Confidentiality agreements for agency personnel –Requirement in agreement/part of education platform
12	Incident Response Plan –Part of education platform
13	Third Party Access Policy –Part of education platform
<i>Education and Training Citizens for Agents and Agencies</i>	
14	Enhance existing training for agents and agency principals in security threats, appropriate safeguards and incident response
15	Continue to encourage agencies to develop staff training programs and provide assistance as appropriate

Most of the recommendations were accepted and are scheduled to be implemented. A few of the recommended “requirements” in the agency/agent appointment agreements will be recommendations or accomplished through training.