

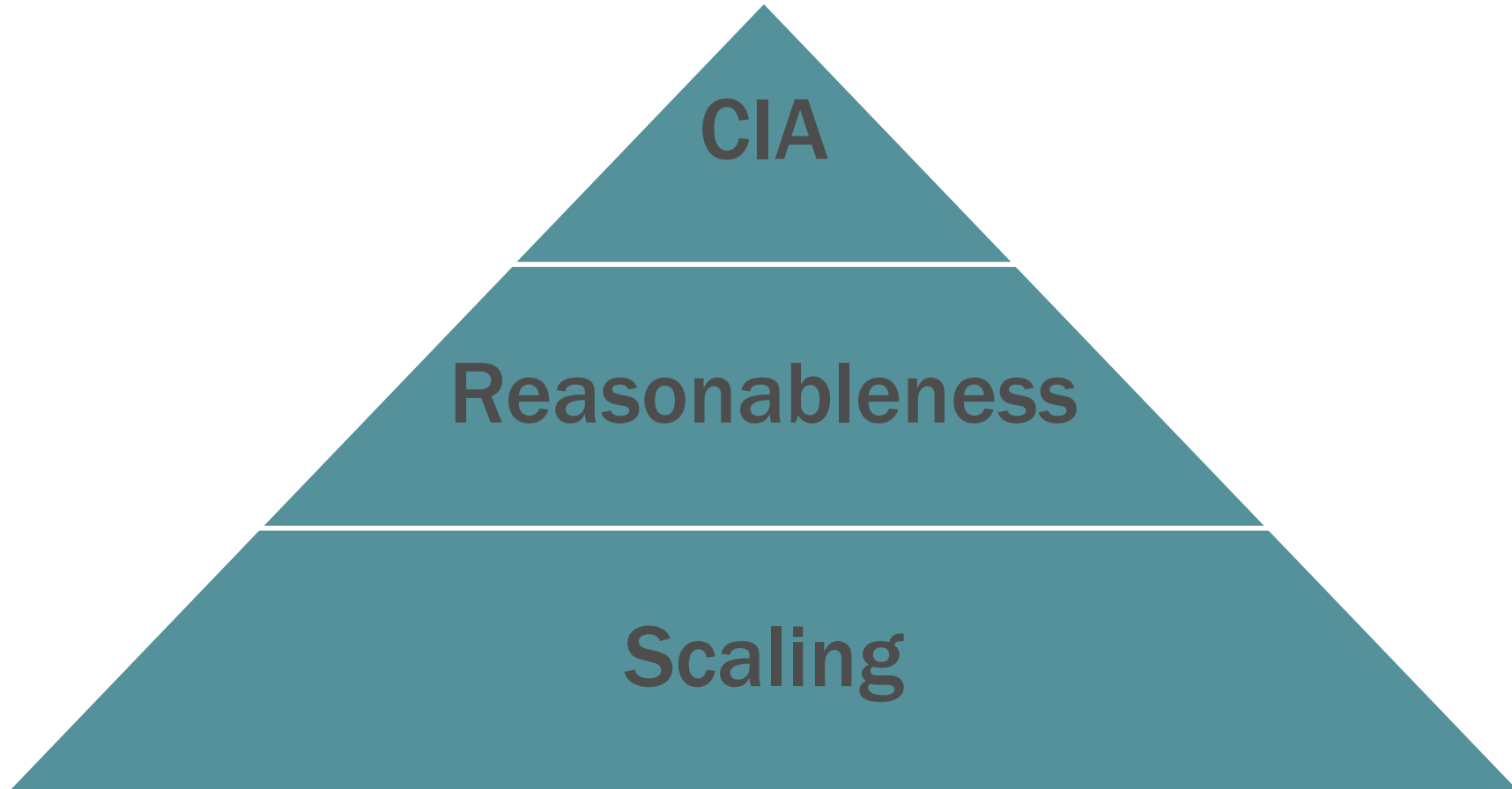
Seeing the Forest for the Trees

Three Common Threads



- **Three threads provide a broad picture of compliance obligations**
 - Common standards promulgated by laws and regulations
 - Common contractual standards (PCI DSS)
 - Common industry standards (CERT at Carnegie Mellon, and the International Standards Organization)

Three Common Threads



First Common Thread



- **CIA: Confidentiality, Integrity, and Availability**
- **CIA is a basic principle of information security**
 - Data must be held in confidence
 - Data must be protected against unauthorized modification
 - Data must be available for use when needed

Second Common Thread



- Acting “reasonably” or taking “appropriate” or “necessary” measures to protect data
- Businesses must do what is reasonable or necessary; perfection is not required
- EU, Australia, Canada, US, and many other countries

Third Common Thread



- **Scaling security measures scale with the nature of data and the risk presented**
- **Closely related to acting reasonably or doing what is necessary**
- **Security measures should reflect the sensitivity of the data and severity of the risk**
- **The greater the risk and sensitivity of data, the greater the effort to secure the data**

Questions & Contact Information



Michael R. Overly
Partner, CISA, CISSP, COP, CIPP,
ISSMP, CRISC
Foley & Lardner LLP
555 South Flower Street,
Suite 3500
Los Angeles, CA 90071
(213) 972-4500
moverly@foley.com