



The Federal Trade Commission (FTC) updated GLBA in 2003 with the first Safeguards Rule. Those requirements were updated again in 2021 and must be met now.

Basically, the FTC Safeguards Rule “requires covered companies to develop, implement, and maintain an information security program with administrative, technical, and physical safeguards designed to protect customer information.”

Duffy Compliance is your partner for all your compliance needs, including meeting the FTC Safeguard Rule. To that end, we have put together a short checklist that covers the [requirements from the FTC.](#)

Identify your Qualified Individual.

- This can be a person internal to your organization.
- It can also be an outside consultant or company.

Conduct a risk assessment.

- Define your potential threat actors.
- Define your potential threat events.
- Calculate your organizational risk.

Control access.

- Implement multi-factor authentication for anyone accessing customer information.
- Maintain a log of authorized users' activity.

Protect your data.

- Periodic inventory of your data (where it's collected, stored, and/or transmitted).
- Encrypt customer information.
- Implement multi-factor authentication for anyone accessing customer information.
- Dispose of customer information securely.

Protect your information system and network.

- Regularly monitor and test effectiveness of safeguards.
- Evaluate current and potential changes to your information system or network.
- Monitor your service providers, including periodically assessing their security practices and suitability for your organization.
- Keep your information security program current.
- Create a written incident response plan.

Need Help?

Reach out to us at 301-865-0345 or www.DuffyCompliance.com/contact.