Five keys to a more secure data environment
A holistic approach to data infrastructure security

Compliance professionals know better than anyone how compromised data can lead to financial and reputational risk. But security is a large, multifaceted endeavor, and it can be challenging to step back and see the full picture. Firms need to be equipped to handle a range of potential threats—from natural disasters and technological failures to cyber or real-world criminal activity. To do so requires a holistic approach to security infrastructure, with a clear understanding of the scope.

Whether you are reviewing a third-party provider’s security plan or your own, you should examine these five key categories together:

1. Physical safeguards
2. Network security
3. Application security
4. Capacity planning and reliability monitoring
5. Disaster recovery (DR) planning

Each of these factors is one part of a strong security infrastructure. Many firms have excellent safeguards in some areas, but allocate fewer resources to others. To identify and eliminate gaps that could put your own firm at risk, it’s important to understand the baseline security measures in each area.

Data infrastructure security at a glance:

**Physical safeguards**
- Data centers—both primary and disaster recovery centers—should be protected against natural disasters, sabotage, and power outages.

**Disaster recovery planning**
- If a disaster event incapacitates a firm’s primary data center, a secondary center with 100% redundancy can help provide seamless continuity and prevent data loss.

**Network security**
- Network configurations, encryption, antivirus software, intrusion detection, and regular testing help protect data from cyber attacks.

**Application security**
- Application security helps ensure your data is protected over the Internet for cloud-based solutions such as employee-monitoring software.

**Capacity planning and reliability monitoring**
- Even if firms can handle business needs today, it’s important to ensure that no lapses in service, security, or data reliability will occur as the business grows or new functionality is added.
Physical safeguards

Hackers and data breaches make for high-profile news stories, and while cybersecurity is imperative, it’s important not to overlook old-fashioned physical security. Without the right measures in place, data centers can easily be compromised—and all it takes is one break-in or power outage to disrupt business. Strong physical security can help keep business running as usual by accounting for these risks.

The most secure data centers feature strong perimeters, surveillance systems, and authentication-only access points.

At a minimum, a secure data center will have the following:

**Camera security**
Cameras should be located throughout the facility to monitor and record activity.

**Security personnel**
On-site staff provide additional protection against unauthorized entry 24 hours a day, 7 days a week.

**Unmarked building**
A low-profile building is a reduced target for criminal activity.

**Uninterruptible power supply (UPS) systems**
In the event of a power outage, UPS systems can provide 30 minutes of battery life under peak load—enough time to save files and prevent critical data loss.

**Generators**
Generators should have enough fuel stored to provide up to 48 hours of power in the event of a power outage. The data center should also have access to additional fuel, and cooling units should be in place to keep generators functioning properly.

**Third-party security auditing**
Physical security auditing by an independent firm can help identify gaps. SSAE 16 compliance can provide firms with recognized systems reporting.

**Stringent policies and procedures**
Policies limiting exposure of data to unauthorized people—such as those restricting visitor access and mobile devices—can help to maintain confidentiality.

**Regular reviews**
Physical safeguards should be reviewed regularly with the security, site, or operations manager.

---

What is SSAE 16 compliance?
The Statement on Standards for Attestation Engagement (SSAE) No. 16 is one of the current standards for reporting on service institutions. To become SSAE 16 compliant, data centers undergo a rigorous third-party audit to assess internal business procedures and IT controls.
Network Security

Similar to how physical barriers in a data center protect its servers, network configurations, encryption, antivirus software, and regular testing protect its data from digital attacks.

The financial services industry, in particular, is a common target for cyber criminals and “hacktivists.” In fact, the threat of cyber attacks in the financial services sector has been rising. It’s important to know that you have strong measures in place to guard against data breaches and denial-of-service (DoS) threats.

When you evaluate network security measures, look at the following:

Firewall protection and intrusion detection
Firewalls and intrusion detection systems provide protection and visibility necessary to minimize the threat of security breaches.

Ongoing third-party network penetration testing
Infrastructure penetration simulates an external hacking threat—uncovering vulnerabilities and gaps in the network. This testing can help gauge how vulnerable the network is to both external and internal threats.

Antivirus software
Antivirus software should be active on all servers.

Security patches
Security patches help ensure systems always operate on the most current version of a software application. For software to stay up to date, these patches should be applied whenever necessary.

Encryption
All back-end file transfers should be encrypted using the latest industry standards.

Application security

Application security is an extension of network security, which has become increasingly important as more and more software applications become available over the Internet. The applications can include cloud-based compliance and employee-monitoring software.

When evaluating application security, look for the following standards:

Secure Sockets Layer (SSL) encryption
All data transferred between a user’s browser and employee-monitoring software should be protected using SSL encryption.

Regular data scans
Data scans should be conducted at least once a week to help monitor for any unknown hacking situations.

Database encryption
Firms’ sensitive personal information should be encrypted in their databases.

Application architecture
Applications should be built using industry-leading technology standards.

Single sign-on (SSO)
With an SSO authentication process, user access to multiple applications is granted via the firm’s corporate directory. This process eliminates the need to authenticate separately for each application, which reduces the need for multiple IDs and passwords.

Third-party application penetration testing
Application penetration tests simulate an internal hacking situation where intruders have some privileges or inside information about the system, but are attempting to go beyond the activities for which they’ve been authorized.
Capacity planning and reliability monitoring

Capacity planning is a vital part of security. Even if a firm has the capacity to handle today’s business needs, planning is necessary to ensure that client service can continue at the same level, and that data can keep flowing as the business and client base grow.

But scalability alone is not a guarantee that data will remain reliable after growth. In order to ensure reliability as systems evolve, firms must conduct regular monitoring and testing—especially as they add new functions or applications.

Consider the following reliability standards:

Site access
Websites should be accessible 365 days per year, 24 hours a day—regardless of access point or traffic load.

Performance testing
Before launching any new function, performance testing can assess whether the system can accommodate the new features and increased load.

Reliability monitoring
Devices should be consistently monitored to help diagnose problems before they happen. Reliability monitoring can also help to quickly identify errors, so they can be repaired swiftly. Real-time dashboard tools can help analyze the overall health of critical websites.

Device redundancy
Redundancy for every device in a network helps ensure that if one device goes down, the system can continue to function.

Disaster recovery planning

No one can predict when disaster will strike—but everyone can take measures to prepare. Natural disasters, technological breakdowns, and crime all pose threats to the security of your data and that of your clients, making a DR plan essential to any compliance program.

In the event your primary data site is incapacitated, a secondary site can help provide seamless continuity and prevent data loss.

A DR site should always be ready to assume all critical functions of the primary site. For that reason, all the same security measures in place for the primary site—physical, network, application, capacity—should also be implemented in the DR environment.

As a best practice, the back-up data center should have the following:

Secure, low-risk location
DR sites should be located in a geographic region unlikely to be affected by natural disasters, and far from the primary site. The same physical security measures that apply to the primary site should also apply to the DR site.

Server parity
A DR site should be equipped with the same number of servers as the primary site, which can help ensure 100% performance continuity in a failover event.

Regular data back-up
The site is ready to assume primary function at any time—which means data should be frequently and regularly backed up from the primary site to the DR site.

Reliability testing
Any testing conducted at the primary site should also be conducted at the DR site to ensure reliability.

Business continuity plans (BCPs)

A DR plan is a vital component of keeping a firm’s technology environment secure and its data flowing in the event of an emergency. In addition, a detailed BCP can help ensure critical resources are available and able to continue working in the event that access to the primary office or working facility is limited. BCPs should be tested annually.
Vetting a third-party provider? What you should ask.*

The best way to evaluate a current or potential third-party provider’s data security and reliability is to arm yourself with information. Start by asking questions that can uncover strengths or weaknesses in each of the five key data security categories:

**Physical safeguards**
- What type of physical security is in place for your data center and your business?
- Do you have video surveillance throughout your data centers?
- Do you have on-site security personnel to protect against unauthorized entry 24/7?
- Are your data centers located in unmarked, nondescript buildings?
- In the event of a power outage, do you have an uninterruptable power supply (UPS) system that can provide battery life for a period of time?
- Do your data centers have generators that can provide additional power in the event of a power outage?
- Do you use an independent, third-party auditing firm to help test and identify security gaps?
- Do you have stringent policies and procedures in place to limit exposure of data to unauthorized people?
- Do you conduct regular reviews of physical safeguards?

**Network security**
- What type of firewalls are in place to protect data?
- Do you have an intrusion detection system in place to give visibility to potential data security breaches?
- What type of infrastructure penetration testing is in place to gauge threats posed by both outsiders and those with inside information about the system?
- Is antivirus software active on all servers?
- Are security patches in place to help ensure systems always operate on the most current version of a software application?
- Are back-end file transfers encrypted using the latest industry standards?

**Application security**
- Are data transfers between a user’s browser and the application protected using SSL encryption?
- How do you test new functionality prior to launch?
- What controls are in place for deployment?
- Do you perform ongoing scanning for vulnerabilities? If so, how frequently?
- How do you protect the firm’s sensitive personal information?
- Do you allow for a single-sign-on (SSO) authentication process?
- Is application penetration testing used to simulate internal hacking situations? If so, how frequently is it conducted?
Capacity planning and reliability monitoring

- What is your capacity to grow within the next ___ years?
- What is your capacity planning process?
- How do you test new functionality prior to launch?
- Do you have real-time threshold monitoring?
- What measures are in place to help eliminate single points of failure?

Disaster recovery planning

- Do you have a disaster recovery (DR) plan in place?
- How often is the plan tested, and what were the results?
- What is the scope of the recovery test?
- Do you have a secondary site/back-up data center?
- Is your back-up data center in a geographic region that is unlikely to be affected by natural disaster?
- Is your DR site equipped with the same number of servers as the primary site to help ensure 100% performance continuity?
- Is your back-up data center backed up regularly and ready to assume primary function at any time?
- Does your DR site contain the same security measures as your primary site to help ensure data security?

Business continuity plans

- Do you test your business continuity plan, and what is the frequency?
- What does the test cover? (i.e., pandemic, loss of building, etc.)
- What are the key elements of your incidence response plan?
- Have you invoked your business continuity plan in the last 12 months?

Data loss prevention

- Does the firm have a process to manage IT assets?
- Can data be downloaded onto laptops?
- What is your Information Security Policy?
- Do you conduct periodic risk assessment on your vendors?
- Does the firm leverage industry standards for Distributed Denial of Service (DDoS), intrusion detection network?

*The above is not an extensive list of due diligence questions. Each situation will require different levels of due diligence.*
Compliance Solutions

At Compliance Solutions, the security of your data comes first. To help keep our clients’ data secure, we conduct regular third-party penetration testing and weekly security scans, as well as annual business continuity and DR testing. We also employ a structured software development life cycle and code reviews to ensure integrity and security in our software. Our production servers are hosted by Rackspace, a global leader in managed security.

In addition, we’ve recently made significant technology investments to guard our clients’ data on even greater levels. Some of the most recent upgrades to our system include:

• Enhanced firewall that provides an industry strength Layer 7 protection to the application platform
• Increased primary production site capacity
• Increased DR site capacity—our DR site offers 100% capacity
• Enhanced monitoring of infrastructure and application components to better evaluate the overall health of our system
• Redundancy throughout every layer of technology to provide for transparent failover and recovery

These investments, along with those we will continue to make in the future, are all part of our commitment to data security and reliability for our clients—one more way we help them protect their employees and their reputation.

About Compliance Solutions
Taking ownership of compliance means staying ahead of the regulatory landscape, seeing the big picture, and maintaining control. But it doesn’t mean doing it on your own. Compliance Solutions’ employee-monitoring offer includes Schwab Designated Brokerage Services, Schwab Compliance Technologies™ cloud-based employee-monitoring software, and a wide range of financial products and services for employees. These solutions can help you proactively manage compliance, promote a positive employee experience, build long-term value across your business, and instill trust with clients.

Learn more
Interested in learning more about Compliance Solutions? Contact us today.

877-456-0777
schwab.com/compliancesolutions