

AUTO DEALERSHIP COMPLIANCE

Blackswan Provides Scalable, Affordable & Effective Cybersecurity for Dealerships of All Sizes

OVERVIEW – FTC RULE CHANGE

Recent changes to the Federal Trade Commission (FTC) Safeguards Rule make protecting sensitive customer information by auto dealerships more critical than ever. The revised Rule provides specific guidance for businesses and requires companies covered by the Rule to implement important security measures to keep customer data secure. According to Section 314.1(b), dealerships are considered financial institutions if they're engaged in financial activity or incidental to such financial activity, requiring dealerships to explain their information-sharing practices to their customers and to safeguard sensitive data.

The FTC announced an update to the Standards for Safeguarding Customer Information under the Gramm-Leach-Bliley Act (GLBA) on October 27, 2021. This GLBA change went into effect December 9, 2021, with full compliance required by June 9, 2023.

These new standards will have a significant influence on dealership operations, as well as monetary penalties, such as fines and the inability to process credit cards, if dealers are not in compliance by the deadline. This new revision applies to all dealers and requires documented risk assessment, incident response plan, and yearly report to a board of directors.

IS YOUR DEALERSHIP PREPARED?

The new FTC Safeguards can feel overwhelming – Blackswan's goal is to provide dealerships with key personnel, strategic guidance, implementation, and infrastructure to successfully improve their cybersecurity posture to meet or exceed FTC compliance.

24x7x365 MDR OF YOUR ENVIRONMENT (MONITORING/DETECTION/RESPONSE)

Blackswan's MDR is a scalable managed security service capable of monitoring your entire technology environment 24 hours a day. We work with your team to fill in capability, bandwidth, and resource gaps.

- 24/7/365 Staffed Security Operations Center (SOC)
- Eyes-on-Glass Expert Monitoring, Detection, and Response
- Breach Response and Forensics Support
- Vulnerability Management
- Data Recovery and Investigative Support
- Threat Intelligence

CHIEF INFORMATION SECURITY OFFICER AS A SERVICE (vCISO)

Dealers must appoint a qualified individual – Chief Information Security Officer (CISO) to supervise data security. Blackswan's vCISO program provides information security consulting in support of your ongoing information security, IT risk, and IT compliance initiatives.

We work closely with you to provide consulting and advisory support to current information security requirements and projects in addition to consulting to improve performance from the current cybersecurity program. Blackswan works with dealerships to evaluate and establish cybersecurity program baselines, which are fundamental to being able to effectively build a sustainable cybersecurity program.



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INFORMATION RISK ASSESSMENT AND POLICY & PROGRAM DEVELOPMENT

Blackswan Cybersecurity provides a thorough evaluation of potential risks associated with compromised member data. This includes physical, administrative, and technical security standards and guidelines, including e-commerce solutions that are provided to your members. Included with this service is a customized Information Security Policy & Program ready for executive review and board approval. Programs can be structured on an as-needed basis or in partnership with Blackswan for ongoing Infosec Compliance assistance.

WHY BLACKSWAN CYBERSECURITY?

Most organizations lack the in-house expert guidance and IT staff required to adequately bring a dealership into compliance with the new Safeguard Rules. Nor do they have adequate personnel for the Rules' 24x7x365 monitoring, analysis, and response requirement. Blackswan's team has extensive experience helping organizations achieve compliance in various industries and have served in leadership roles ranging from Partner in KPMG's Information Risk Management Practice to executive positions at other "Big Four" firms and publicly traded companies to Corporate Board appointments.

CYBER SERVICES ALIGNED WITH FTC, GENERAL MOTORS & STAR

Cybersecurity Requirements & Objectives	FTC Safeguards Rule Deadline 6/08/23	GM Cyber & Star Guidelines	Blackswan Dealership Bundle
Implement Information Security Program to Safeguard Customer data and a framework for Governance & Compliance	✗	✗	✓
Designate "Qualified Individual"	✗		✓
Perform Annual Risk Assessment	✗	✗	✓
Access Controls, MFA, & Encryption Controls	✗		✓
Implement Unified Threat Management		✗	✓
Endpoint & Email Protection		✗	✓
Systems Inventory & Secure Deployment	✗	✗	✓
Customer Data Disposal Procedures	✗		✓
Change Management	✗	✗	✓
Patch Management Procedures		✗	✓
Continuous 24x7 Monitoring and Response (SIEM)	✗	✗	✓
File Integrity Management & Monitoring		✗	✓
Network Vulnerability & Penetration Testing	✗	✗	✓
Incident Response Plan	✗	✗	✓
Security Awareness Training	✗	✗	✓
Annual Management Reporting	✗		✓

PREPARE. COMPLY. MONITOR & DETECT. RESPOND.

