

Protecting Client Data: Is My Firm At Risk?

Does your firm maintain sensitive personal data* (e.g., social security numbers, financial data, etc.) for clients?	Yes 🗖	No 🗖
If the sensitive personal data is maintained in paper format, such as audit papers or tax returns, do you allow employees to take this information out of your office?	Yes 🗖	No 🗖
Is any of the sensitive personal data maintained in electronic format?	Yes 🗖	No 🗖
Does your firm maintain sensitive personal data on file servers that are connected to the Internet?	Yes 🗖	No 🗖
Do staff members copy sensitive personal data to laptop hard drives or memory sticks that are allowed to leave the office?	Yes 🗖	No 🗖
Do you have an e-mail system that allows anyone in your firm to transfer any document stored on your internal network to anyone outside your firm?	Yes 🗖	No 🗖
Do you allow wireless connections to your network?	Yes 🗖	No 🗖
Does your firm allow employees to access network resources using remote access technologies or a virtual private network (VPN)?	Yes 🗖	No 🗖
Do you send client data files to outsourcing companies?	Yes 🗖	No 🗖
Do your employees allow vendors to provide technical support by remotely connecting to your firm's computers?	Yes 🗖	No 🗖
Are your employees allowed to send client data files to your vendor's technical support representatives using unsecured e-mail?	Yes 🗖	No 🗖

If you answered "Yes" to any or all of these questions, your firm is a risk of exposing your clients' sensitive personal data. This exposure may cost your firm a significant amount of money and permanently tarnish your firm's reputation. The following is a series of questions that will help assess if you have implemented policies and procedures that will protect your clients' data.

* As defined by the AICPA Generally Accepted Privacy Principles (GAPP) – see http://www.aicpa.org/privacy

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Mitigating Your Risk

Does your office have an alarm system?	Yes 🗖	No 🗖
Are your network servers located in a restricted area?	Yes 🗖	No 🗖
Are you using a firewall to protect your network?	Yes 🗖	No 🗖
Does your firm have a Data Protection Policy?	Yes 🗖	No 🗖
Do you require strong passwords to access network resources?	Yes 🗖	No 🗖
Do you use two-factor authentication on your network?	Yes 🗖	No 🗖
Are you using encryption technology to protect the information stored on your laptop hard drives and memory sticks?	Yes 🗖	No 🗖
Do you use locking cables to secure your laptop computers?	Yes 🗖	No 🗖
Does your firm use secured email or a client portal to securely exchange data files with clients?	Yes 🗖	No 🗖
Is your firm familiar with your responsibilities under California Senate Bill 1386 or the 31 other state security breach notification laws?	Yes 🗖	No 🗖
Has your firm developed an incident response plan that would be followed in case of the loss of sensitive client data?	Yes 🗖	No 🗖
Does your firm use any technology to track a stolen laptop?	Yes 🗖	No 🗖
Have you installed software that can remotely erase a laptop hard drive in case it is lost or stolen?	Yes 🗖	No 🗖
Do your employees receive training with regard to the firm's data protection policies and procedures?	Yes 🗖	No 🗖

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