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# Considering the Cloud

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# Saltmarsh, Cleaveland & Gund

## ABOUT THE FIRM

Saltmarsh is one of the largest locally-owned CPA and business advisory firms in the Southeast, serving clients throughout the U.S. and worldwide from offices across Florida and in Nashville, Tennessee.

### SIZE OF FIRM



### AFFILIATIONS

SALTMARSH FINANCIAL ADVISORS, LLC



THE BDO ALLIANCE USA



### OFFICE LOCATIONS

5

**FLORIDA**  
Ft. Walton Beach  
Orlando  
Pensacola  
Tampa

**TENNESSEE**  
Nashville



**Saltmarsh**  
Saltmarsh, Cleaveland & Gund  
CERTIFIED PUBLIC ACCOUNTANTS AND CONSULTANTS

### SERVICES OFFERED

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### OUR CLIENTS

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# Considering the Cloud

Cloud adoption looks increasingly inevitable but it isn't automatic. We should see it is a significant pivot of enterprise that must be managed. In the process each of us will embrace new risks, shed old practices and develop new skills.

# What are Regulators Saying

- FFIEC Joint Statement on Security in a Cloud Environment- April 30, 2020

## **Two actions of note to review:**

- Capital One – Consent Order – August 5<sup>th</sup> 2020 - OCC
- First American Title – Cybersecurity Enforcement Action – July 22, 2020 – New York DFS

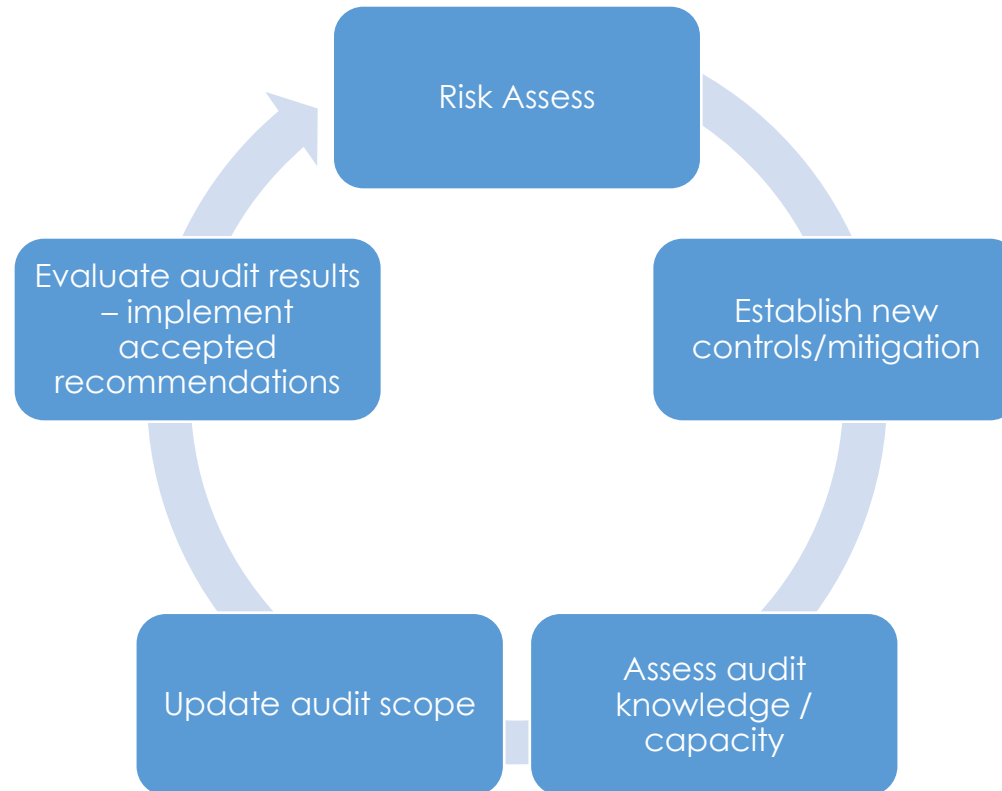
# How do I show my work? Lay the groundwork

BOD / Executive  
formulate financial  
institutions  
strategic plan

BOD sets a risk  
appetite

Build out an IT  
specific strategic  
plan

# How Do I Evaluate my Work? Risk Management Life Cycle



# Thoughts on Managing the Cloud?

- Outsource to vendor or manage internally? (Cloud skills gap could also exist with the vendor)
- Standard “out of the box” configurations may be user friendly but not necessarily security minded.
- Evaluation of vendor audit reports and measuring compliance with complimentary user entity controls “CUEC’s”
- Policy and procedure framework may fundamentally change. (Including your: Risk assessment, IT Policy, Information Security Program, Disaster Recovery BCP, Incident Response Plan)
- Audit risk and process may fundamentally change.
- Evaluate insurance coverages and protections.
- How will you confirm your data is destroyed?

# Disaster Recovery Perspectives?

- Evaluate single points of failure
- World class cloud solutions could still need a backup plan.
  - “We strive to keep the Services up and running; however, all online services suffer occasional disruptions and outages, and Microsoft is not liable for any disruption or loss you may suffer as a result. In the event of an outage, you may not be able to retrieve Your Content or Data that you’ve stored. We recommend that you regularly backup Your Content and Data that you store on the Services or store using Third-Party Apps and Services.”
- Recovery plans will rely on outside parties. Update and revise existing plans to encompass this eventuality.



# Real Applications for O365 (AKA Microsoft 365) and beyond.

- One of the most commonly utilized cloud services at our institutions.
- One of the most common services supported and managed by Saltmarsh MSP.

So we have learned some key points to share!

*Want more send us an Email for a list of configuration settings you should evaluate enabled/disabling.*

# Parting thoughts....

- Don't allow yourself to focus narrowly on the application. Consider if there may be a broader impact.
- Build your expertise, clearly evaluate your vendors expertise.
- Similarly evaluate risk/audit expertise and testing plan.
- Leave a trail by documenting key decision points.

# CONTACT



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