

Compliance Audit III: GLBA / IS regulations.

Triac Compliance, LLC.

Schedule

Although this review may be conducted at any point during the year, we frequently conduct it during the third quarter of the year.

Area(s) of Review

This review addresses compliance with regulations in respect to privacy of consumers' nonpublic personal information in accordance with:

- Privacy of Consumer Financial Information (12 CFR 364)
- Title V of The Gramm-Leach Bliley Act (GLBA)

Scope of Review

The scope of the review is modified to meet the needs of each client. Typically, however, it includes the following:

- Review of institutions adherence to both the technical and non-technical requirements imposed by the GLBA.
- Review and evaluate the adequacy of administrative, technical and physical safeguards as they relate to the banks privacy policy.
- Review of consumer disclosures and third party (opt-out) notifications.
- Evaluation of programs for monitoring and controlling Information Systems (IS) risk.
- Review efforts to provide adequate policy instructions and ability to enforce such policies.
- Review controls regarding access to secure areas and facilities, as well as machines and equipment.
- Review policies and management regarding information disposal.
- Review of internal audits and their effectiveness.

The completed audit will yield vulnerability analysis and assessment which will be used to determine if policy, as well as administrative, technical and physical safeguards are appropriate to the size and complexity of the institution, and are adequate for the nature and scope of its activities.

Additionally our auditors will conduct the following reviews in accordance with Interagency Guidelines Establishing Information Security Standards:

- Review of business continuity plan and disaster recovery preparedness.
- Review vendor management programs.
- Assure service providers meet IGEISS objectives.

Fee

Depending on the needs of the institution, this review typically requires two to four days. For a specific fee proposal for your institution, please contact Frank Young, Partner/Chief Auditor, at 888-388-7422 or frankyoung@triaccompliance.com.

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