



FTC Safeguards Rule Checklist

- Designate a Qualified Individual to implement and supervise your information security program
- Conduct an initial risk assessment
- Design and implement safeguards to control the risks identified
- Implement and periodically review access controls
- Encrypt customer information at rest and in-transit
- Implement multifactor authentication for anyone accessing customer information
- Dispose of customer information securely
- Anticipate and evaluate changes to your information system or network
- Maintain a log of authorized users' activity and monitor for unauthorized access
- Implement a program to educate staff on data security and privacy rules
- Select, retain, and monitor qualified service providers
- Create a written response plan designed to assist in promptly responding to and recovering from a breach
- Keep your information security program current
- Require the Qualified Individual to report to the Board of Directors annually

