NVB Nederlandse Vereniging van Banken

National Infrastructure against Cybercrime
A public private partnership

Management of data breaches

Brussels, Oktober 23rd, 2009

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Netherlands Bankers' Association

- NVB = Nederlandse Vereniging van Banken
- Appr. 90 members (all banks)

Mission statement:

NVB strives towards a strong, healthy and internationally competitive banking industry in the Netherlands. Representing the common interests of the banking sector, it strives towards the effective operation of market forces whilst taking into account the interests of its interlocutors

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Agenda

1. Where are the risks in the e-channel
2. Dutch “National Infrastructure against cybercrime”
3. European initiative on information exchange
4. Incident reporting
5. Final remarks

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Risks on e-channels in NL

- E- channels
  - ATM and POS
  - Internet (banking and payments)

- NL statistics 2008
  - 1.7 billion POS transactions
  - 600 million ATM transactions
  - More then 50 % of the domestic payments are done via the Internet
  - iDEAL: 28 Million transactions

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Fraud statistics

- NVB published figures on skimming fraud 2008: 31 million Euro
- No statistics on e-banking fraud. (still) limited damage

Important:

- To exchange information on vulnerabilities, incidents and measures
- To know modus operandi of attacks

Information security is no issue for competition

Cybercrime Information Exchange

NICC = National Infrastructure (against) CyberCrime

Sponsored by Dpt. of Economic Affairs

Learning by doing

- Key factors:
- Trust
- Value

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Trust is key

- Trust and value grow together but need investment
- Flourishes in small groups, same members. It is personal
- Participation is voluntary, but not free of obligations
- Strict information sharing protocol (TLP) is important to build trust

Building trust takes time!

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Traffic light model

- Red: on going incidents, information with potential PI-damage, information from secret services
  - Verbal, not recorded during meetings
- Yellow: information that is meant for further distribution within the bank or the (ICT) service provider
  - Confidential, not top secret
  - Anonymised
  - Distributed via closed FI-ISAC list server
- Green: no rules for disclosure

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Key success factors

- The Network works
- Raising awareness (information)security, also on management level
- Added value for all participants
- Only successful if all participants contribute
- No contribution = no participation
- Voluntary but not without obligations
- Trust as foundation for information sharing
- Flywheel necessary to keep the network going. Permanent input of content is needed!

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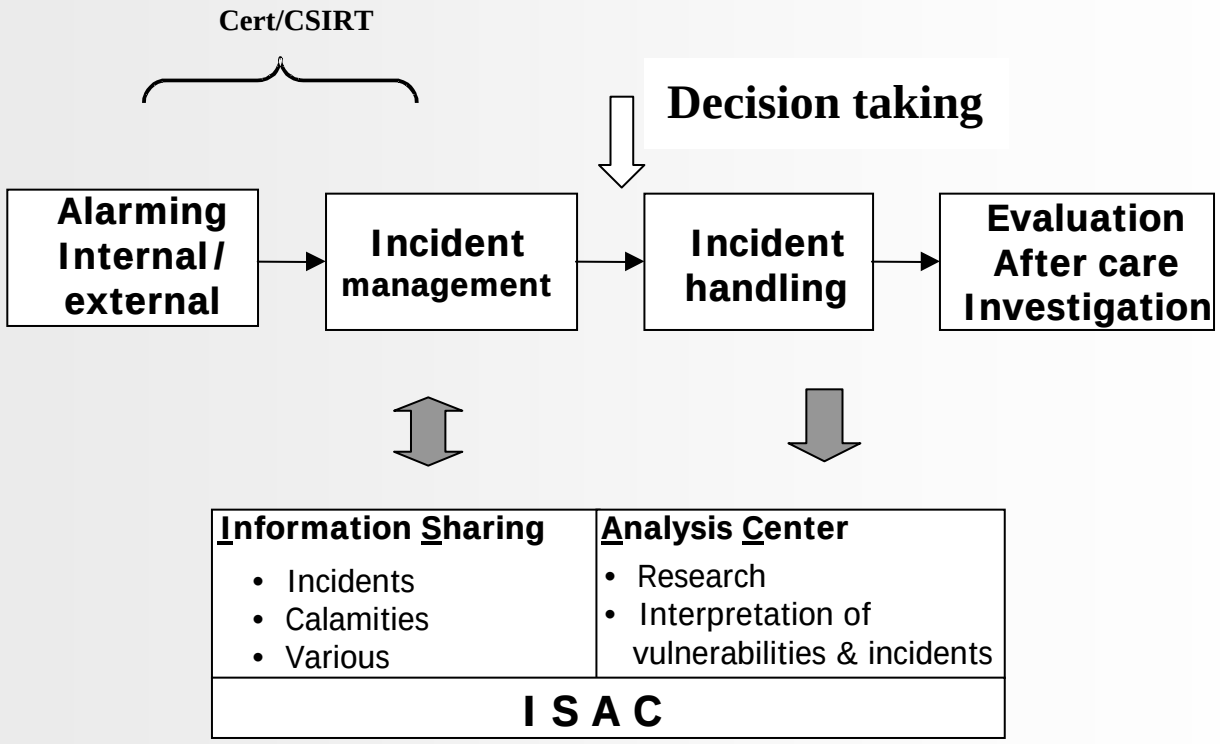
ISAC ≠ CERT



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Operational framework ISACs

- 8 meetings a year
  - Open and closed sessions
- Max. 2 participants per member (senior IT security experts
- NICC guidelines
  - Proven effort
  - Non disclosure agreement
  - Traffic light model
- Information Exchange via e-mail, fact sheets and during meetings
- Additional services
  - Threat monitor, Malware monitoring service (CMIS++)

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FI-ISAC

FI-ISAC.NL

Members:

ABN AMRO	BNG
ING	Van Lanschot Bankiers
Fortis	Achmea Staalbankiers
Rabobank	Friesland Bank
SNS Reaal	

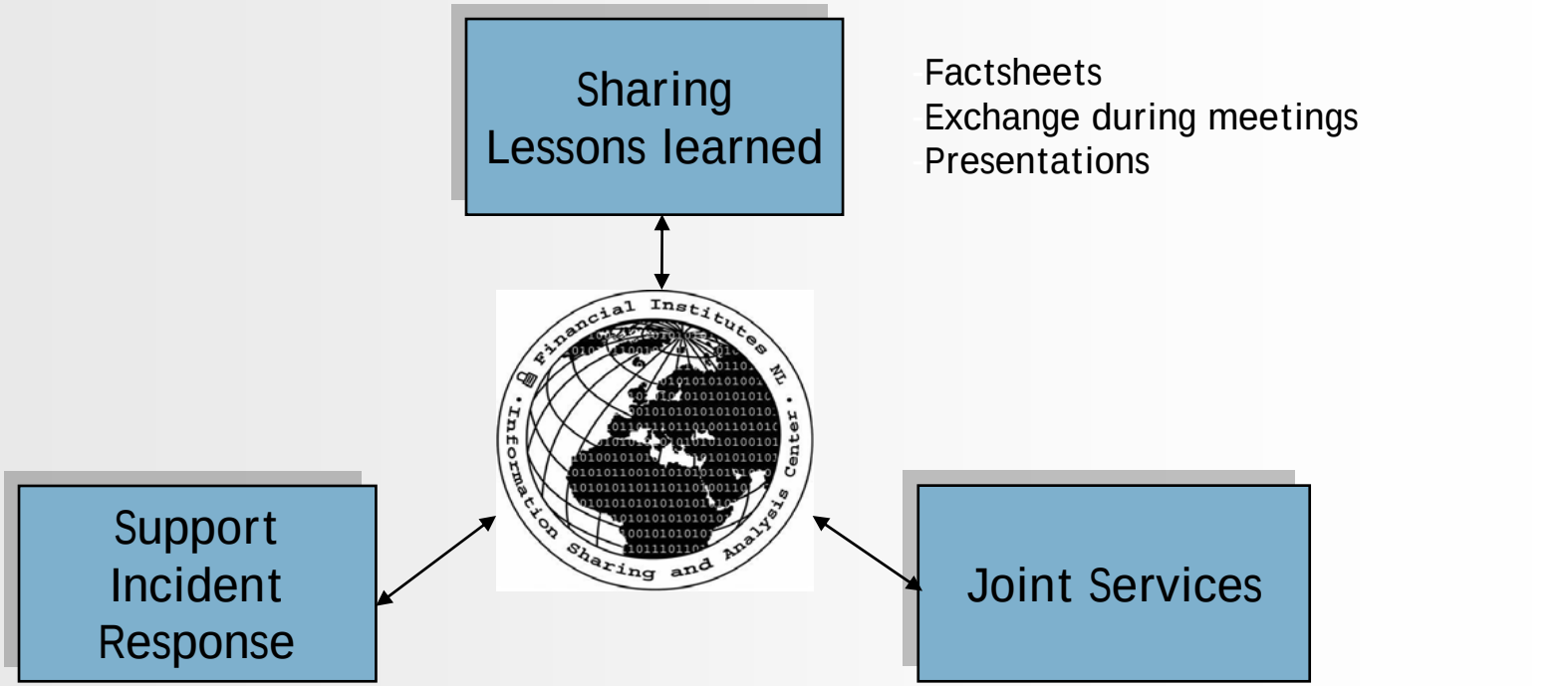
Financial Sector (core infrastructure):

NVB (NL Bankers' Association)	DNB (not as supervisor)
Equens	Currence

Government:

KLPD	GOVCERT.NL
AIVD	NICC

3 pillars


Sharing
Lessons learned
Factsheets
Exchange during meetings
Presentations
Financial Institutes NL
Information Sharing and Analysis Center
Support
Incident
Response
Joint Services
Notice-and-Takedown
AUSCert listserver
Cybercrime monitor and Investigation Service ++
Information Threat Monitor

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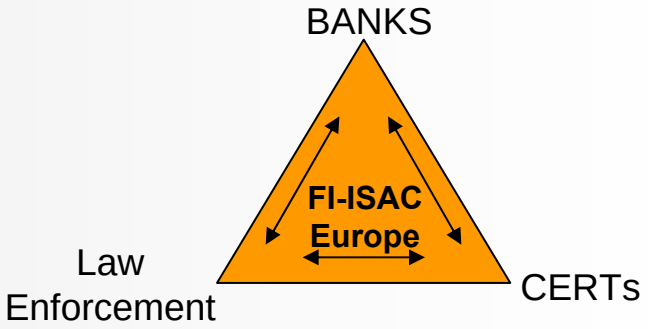
Expanding the FI-ISAC IE outreach

- Towards a European FI-ISAC
  - November 2008 first meeting in Hungary
  - 20-21 April 2nd meeting in Amsterdam
  - 3rd meeting November 9 and 10 (in Bern)
  - Sponsored by ENISA (up to now)
  - Model more or less the same as in NL
    - However situation varies per country
    - Politics play a role and of course the level of trust….
  - Main question: who wil co-ordinate/facilitate this European initiative?



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Incident reporting

Banks report incidents to the Dutch Central Bank

Structure

- Initial report shortly after incident occurs
- Intermediate reporting (in case of large scale incidents)
- Post mortum report (after finalisation of incidents)

Criteria per bank what to report.

Process is bank specific

Stakeholder / Events Map

Bank or Stakeholder Losses

→ Financial

→ Data

→ Information

→ Privacy

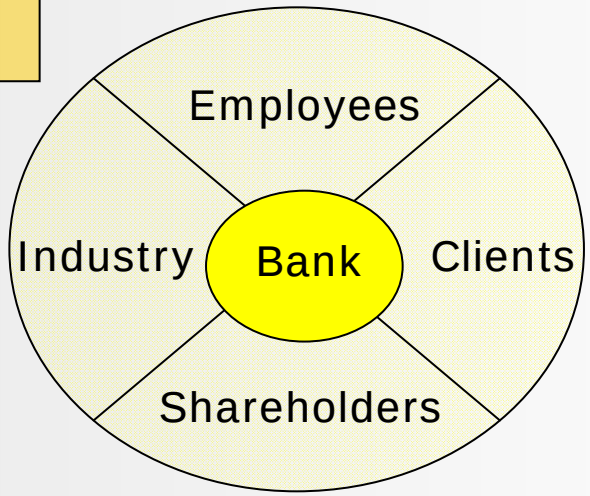
(Prolonged) Lack of Accessibility / Availability

→ Information

→ Liquidity

→ Systems

- Clearing
- Securities Settlement
- Payments (SWIFT,ATMs...)



Impaired Liquidity / Solvency

Breaches of Laws / Regulations / Security

(incl. Sustainability)

Industry Impact & Reputation

Escalation Grid

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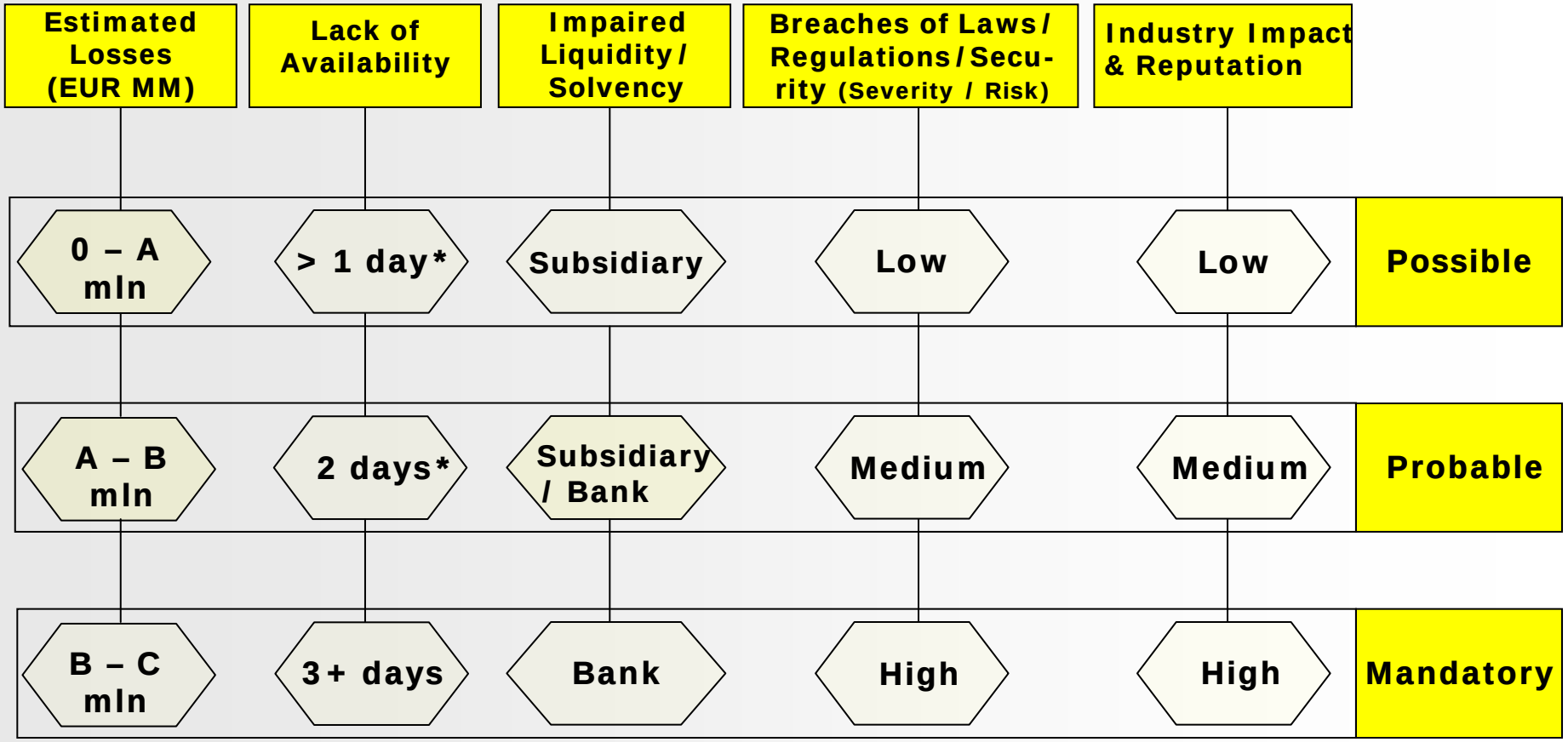

- **NOTE: If one category = Mandatory Escalate!**
- (Day(s) = Working days)

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Question answered (?)

- With regard to managing data breaches, what are the agreed practices, “standardised” approaches, and “templates” used?
- What actors are involved?
- What is there specific responsibility?
- How and what information is shared?

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End of presentation