College Sample Pty Ltd

Cyber Security Assessment focused on secure handling of PII and Sensitive College Data and ensuring Compliance.

Audience: Board/C Suite/Senior Management





Briefing Intent

- This sample is indicative of the report which you'll receive at the end of an assessment.
- This redacted report is from assessments done on a number of Colleges and Organisations.
- The report provides clarity around the type of user behaviour, data movement and cyber risks that you can expect to be covered during the assessment.



Assessment Scope

The scope of GuardWare Assessment is to assess customer's current security processes and controls (ISMS) based on the following criteria:

- 1. Ability to securely handle sensitive data namely PII information in line with the requirements of Australian Privacy Principals and NDB Scheme.
- 2. Ability to securely handle commercially sensitive data in line with ISO/IEC 27001, ACSC Essential 8 and ACSC Information Security Manual (ISM) recommendations.
- 3. Assess current state of IT Security Governance in line with cyber security controls and the ability to handle a data breach.

Note: Physical security of office environment and equipment is out of scope for this project.



Executive Summary

College faces considerable risk of a Data Breach.

Assessment showcased risky handling of PII data.

The assessment has shown that the College lacks data monitoring controls and faces the risk of losing sensitive IP either due to human error or malicious intent.

During the assessment 2 suspicious activities regarding College IP were also detected which need urgent action.

College lacks full implementation of ACSC ES8 controls. Two of the controls being detected as failing.

The College doesn't have any IT Security Governance processes in place. This further increases the risk of data loss and breach.

College is advised to take immediate actions to rectify the current state of cyber security. A list of recommendations based on their priority is provided at the end of this document.

Monitoring done from 26th Nov to 13th Dec 2022 158 users monitored on 146 devices

ISMS Evaluation Criteria	Implementation level	Risk Level (High, Medium, Low)
Ability to securely handle sensitive data namely PII information in line with the requirements of Australian Privacy Principals and NDB Scheme.	20%	High
Ability to securely handle commercially sensitive data in line with ISO/IEC 27001, ACSC Essential 8 and ACSC Information Security Manual (ISM) recommendations.	20%	High
Assess current state of IT Security Governance in line with cyber security controls and the ability to handle a privacy breach.	20%	High

16 High risk actions detected which require urgent attention

detected

4 Medium risk actions

2 suspicious activities detected – Need urgent action

Non-Compliance to ES8 and when handling PII data

Page 4



Risk Summary



IT Governance Summary

Na		Implemented/Partial/	Risk Level
No	IT Governance Aspect	Not Implemented	No Risk, Low, Medium, High)
1	Information security policies	Not Implemented	High
2	Organisation of information security	Partial	Medium
3	Ensuring responsible use of information assets	Partial	High
4	Control Access of data (Access control)	Partial	medium
5	Ensuring data is secure when stored. (Data at rest)	Partial	Low
6	Monitoring Movement of Data (Data Egress Monitoring)	Not Implemented	High
7	Supply chain security	Not Implemented	High
7	Information security incident management	Partial	High

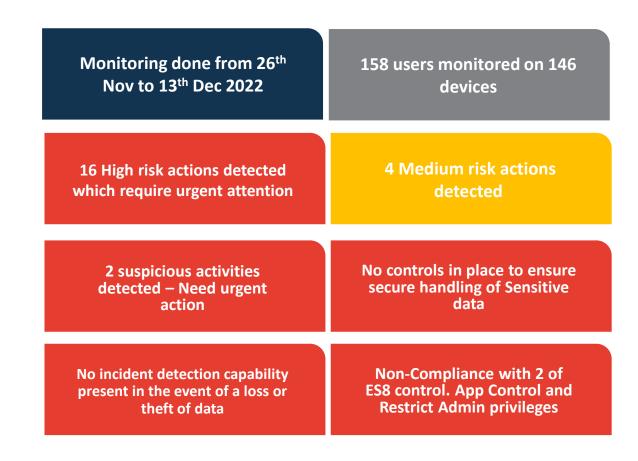
Page 6



Data Handling Risk Summary

Monitoring Parameters:

- Only customer owned devices were covered.
- The following types of data were monitored:
 - Sensitive PII data covering TFN, Credit Card, Mobile numbers, Account numbers, Medicare Numbers, Name and Address.
 - Generic College IP Documents
 - General files of any type including source code, images, zip etc
- Monitoring USE CASES included those recommended under ACSC ISM around Insider Threats and Secure handling of PII Data



Page 7



Use Cases	Technical Control Implemented/Partial/Not Implemented/Failed Control	Risk Level (No Risk, Low, Medium, High)
PII and Sensitive College IP transferred using external storage media		
High use of unencrypted USBs. 44 users detected using unencrypted USBs to transfer data.	Technical control not implemented	High
High transfer rate. 8 users transferred over 1000 files.	Technical control not implemented	High
Outside of normal business hours. High rate of transfers detected outside of normal working hours.	Technical control not implemented	High
Transfer of Potential Sensitive Data.		
Top 8 users detected transferring 1000s of design related files.	Technical control not implemented	High
Several users transferred files containing potential sensitive data		
Visibility of transfers. Visibility of sensitive data transferred using external media	Technical control not implemented	High
Suspicious User Activities		
Suspicious User Activity – User1 - Use of personal emails to send corporate data		
 User detected using his personal email to send highly sensitive Intellectual Property marked data to unauthorized 3rd parties. 	Technical control not implemented	High
Suspicious User Activity – User2 – Data copied by user about to leave the organisation.		
 User copied 1000s of design files also printed his CV during the same time. There is evidence he has visited job sites (Indeed) and applied for related engineering jobs around the same time when he copied the files. The files have been copied on unencrypted USBs which most likely are personal. He is also seen accessing and uploading files to personal Google Drive. He belongs to the Engineering User Group. 	Technical control not implemented	High

Page 8 www.guardware.com.au



Use Cases	Technical Control Implemented/Partial/Not Implemented/Failed Control	Risk Level (No Risk, Low, Medium, High)
Corporate Email Analysis – PII Data forwarded by staff to personal emails.		
Customer data forwarded to personal emails by staff. Email detected being forwarded to user own personal email.	Technical control not implemented	Medium
Visibility of email forwards. Visibility of what files have been forwarded by users to personal and free emails to ensure they are accounted for.	Technical control not implemented	High
Use of Personal Emails		
Use of Personal emails detected. Personal emails have been used to send data.	Technical control not implemented	High
Visibility of Personal Email Use. Visibility is required to ensure College data is not being sent out via personal emails.	Technical control not implemented	High
Use of Non-Organisational Unauthorised Applications		
Technical Control Circumvented. The users seem to have found a way to install non-organisational applications.		
Non-Compliance of 2 of the ES8 Controls. 1. Restrict administrative privileges 2. Application control	Failed Technical Control	High
Visibility of Application Use. Visibility of what applications are being used by users.	Technical control not implemented	High
PII data transfers using Cloud Applications and non-organizational websites		
Risky Transfer Application Use. 6 users detected using Dropbox or Google Drive to transfer files. Transfers include potentially sensitive data.	Failed Technical Control	High
Risky website Use.19 users detected using Facebook and potentially transferring data.	Technical control not implemented	High
Visibility of transfers. Visibility of sensitive data transferred using APPs and encrypted websites.	Technical control not implemented	High

Page 9 www.guardware.com.au



Use Cases	Technical Control Implemented/Partial/Not Implemented/Failed Control	Risk Level (No Risk, Low, Medium, High)
Printing of PII Data		
Printing of potential sensitive data. Printing of sensitive data was observed.	Technical control not implemented	Medium
Printing use personal Printers. As users are allowed to work from home there is risk of files being printed using home printers.	Technical control not implemented	Medium
Visibility of Printing. Visibility of what files have been printed either via organisational or personal printers to ensure they are accounted for.	Technical control not implemented	Medium
Access of information		
Authorised Access of sensitive Information. Ensuring authorised users can access files	Implemented	No Risk
Access Visibility. Visibility of who is accessing what files	Implemented	No Risk

Page 10 www.guardware.com.au



Trusted Insider Program monitoring suggestion as per ACSC ISM

Trusted insider program

As a trusted insider's system access and knowledge of business processes often makes them harder to detect, establishing and maintaining a trusted insider program can assist an organisation to detect and respond to trusted insider threats before they occur, or limit damage if they do occur. In doing so, an organisation will likely obtain the most benefit by logging and analysing the following user activities:

- 1. excessive copying or modification of files
- unauthorised or excessive use of removable media
- connecting devices capable of data storage to systems
- 4. unusual system usage outside of normal business hours
- 5. excessive data access or printing compared to their peers
- 6. data transfers to unauthorised cloud services or webmail
- 7. use of unauthorised Virtual Private Networks, file transfer applications or anonymity networks.

Control: ISM-1625; Revision: 1; Updated: Dec-22; Applicability: All; Essential Eight: N/A A trusted insider program is developed, implemented and maintained.

Control: ISM-1626; Revision: 0; Updated: Nov-20; Applicability: All; Essential Eight: N/A
Legal advice is sought regarding the development and implementation of a trusted insider program.

Reference: ACSC Information Security Manual.



Mapping to Trusted Insider USE CASEs as per ACSC ISM

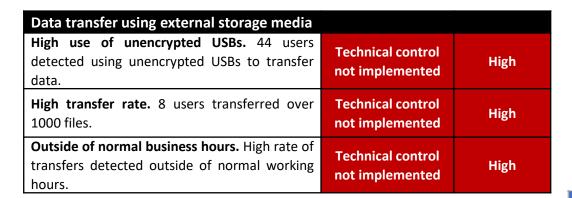
Recommended Use Cases Under ISM	Detected/Not Detected/Not Tested
excessive copying or modification of files	Detected
unauthorised or excessive use of removable media	Detected
connecting devices capable of data storage to systems	Detected
unusual system usage outside of normal business hours	Detected
excessive data access or printing compared to their peers	Detected
data transfers to unauthorised cloud services or webmail	Detected
use of unauthorised Virtual Private Networks, file transfer applications or anonymity networks.	Detected



Storage Media Analysis

Covers all types of media including phone sync.





The use of USBs may be for legitimate reasons but there are significant risks involved.

Risk. Loss of phone or USBs is a common source of data breach and should be monitored and accounted for.

Risk. Potential Insider risk. Non-compliant with Trusted Insider Program monitoring requirements as per the ISM.

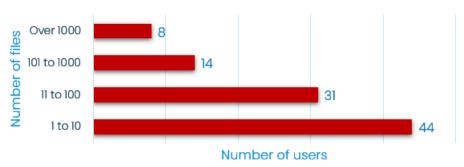
Risk. Compromise of sensitive corporate information. There should be a valid NEED for transferring sensitive corporate information and there should be appropriate visibility to ensure Insider Threat Management and Incident Response in case of loss.

Risk. Use of unencrypted USBs can easily lead to Data loss



Non-Working Day

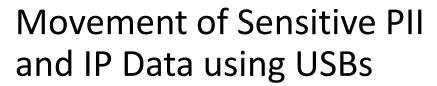
Number of users transferring files to USBs

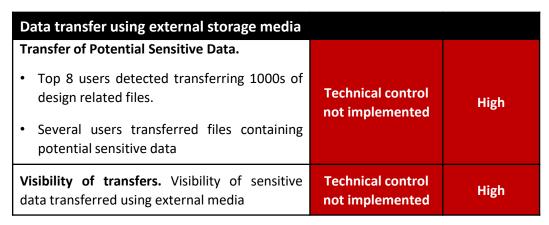


User Name	Ψ.	User Group	Ŧ	Total Events 🔻
xxxxx	Cı	ıstomer Group	_	26256
xxxxx	Cu	ıstomer Group		5221
xxxxx	Cı	ıstomer Group		<u>4212</u>
xxxxx	Cı	ıstomer Group		<u>3362</u>
xxxxx	Cı	ıstomer Group		<u>2326</u>
xxxxx	Cı	ıstomer Group		2125
xxxxx	Cı	ıstomer Group		<u>1782</u>
xxxxx	Cu	ıstomer Group		<u>1506</u>
xxxxx	Cı	ıstomer Group		9
xxxxx	Cu	ıstomer Group		<u>5</u>
xxxxx	Cı	ıstomer Group		4
xxxxx	Cı	ıstomer Group		<u>3</u>
xxxxx	Cı	ıstomer Group		<u>2</u>
xxxxx	Cı	ıstomer Group		2

nour	Working Day	Non-working Day
0:00 - 1:00	0	0
L:00 - 2:00	0	0
2:00 - 3:00	0	0
3:00 - 4:00	0	0
1:00 - 5:00	0	0
5:00 - 6:00	0	0
5:00 - 7:00	0	0
7:00 - 8:00	0	0
3:00 - 9:00	562	0
9:00 - 10:00	41	320
l0:00 - 11:00	10	8798
l1:00 - 12:00	2	331
L2:00 - 13:00	2221	4444
L3:00 - 14:00	14	2144
L4:00 - 15:00	5312	0
L5:00 - 16:00	18620	0
L6:00 - 17:00	421	0
L7:00 - 18:00	2904	0
L8:00 - 19:00	7563	0
L9:00 - 20:00	33111	0
20:00 - 21:00	7	0
21:00 - 22:00	5	0
22:00 - 23:00	2	0
23:00 - 24:00	2	0

Working Day





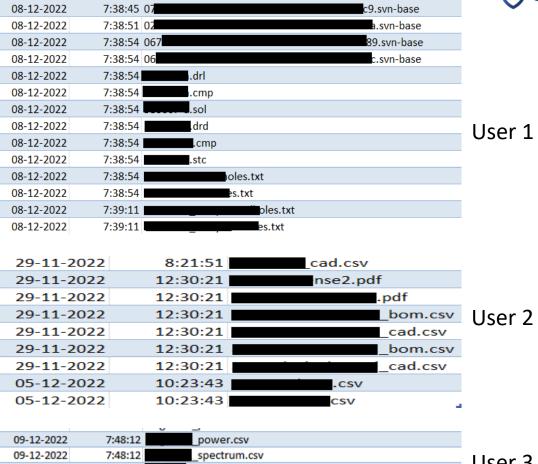
Risk. Without the ability to monitor what is transferred, the College will not even know if data is lost or stolen and will not be able to perform Incident management.

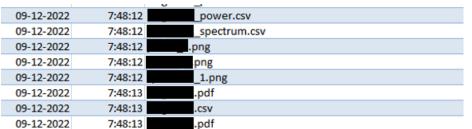
Risk. Potential Insider risk. Non-compliant with Trusted Insider Program monitoring requirements as per the ISM.

Risk. Compromise of sensitive corporate information. There should be a valid NEED for transferring sensitive corporate information and there should be appropriate visibility to ensure Insider Threat Management and Incident Response in case of loss.

Risk. Use of unencrypted USBs can easily lead to Data loss







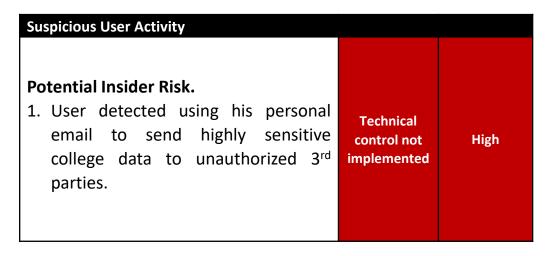
User 3



Suspicious User Activity

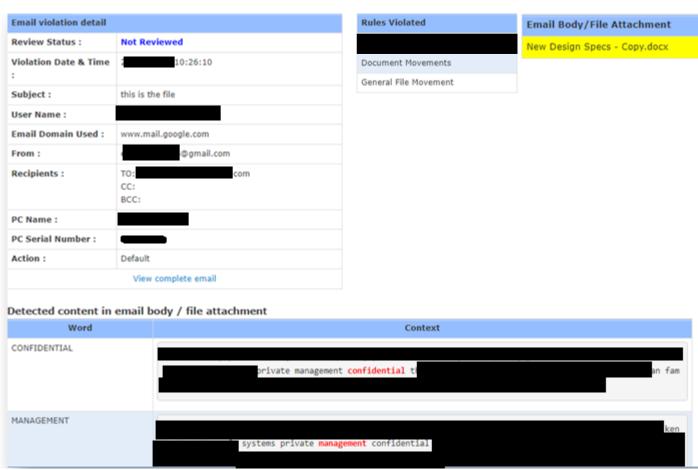
Suspicious User Activity – User1 - **Use of personal emails to send corporate data**





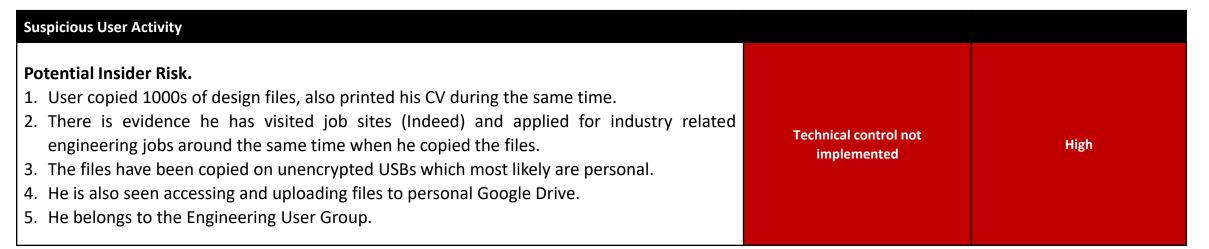
Use of personal emails is a common occurrence in organisations but needs to be monitored as can lead data leak.

Risk: Use of personal emails to exfiltrate data out is consistently reported as one of the keyways data is lost or stolen in organisations and needs to be monitored.





Suspicious User Activity – User2 – Data copied by user about to leave the organisation.



Risk. Rapid and frequent transfer of large amounts of College data, the fact that the user is reviewing his CV and is applying for jobs are all tell-tale signs of a potential insider threat in progress.

Risk. The user has personal Dropbox installed meaning he has circumvented College policy.

Print Event List for XXXXX using printer Canon-X53Series							
	Jser Name	User Group Name	PC Nam	File Name	Event Date	Event Time	File Path
XXXXX			LAP2u82	my cv 2022.docx	02-12-2022	13:40:55	c:\users\XXXX\Downloads\my cv 2022.doc

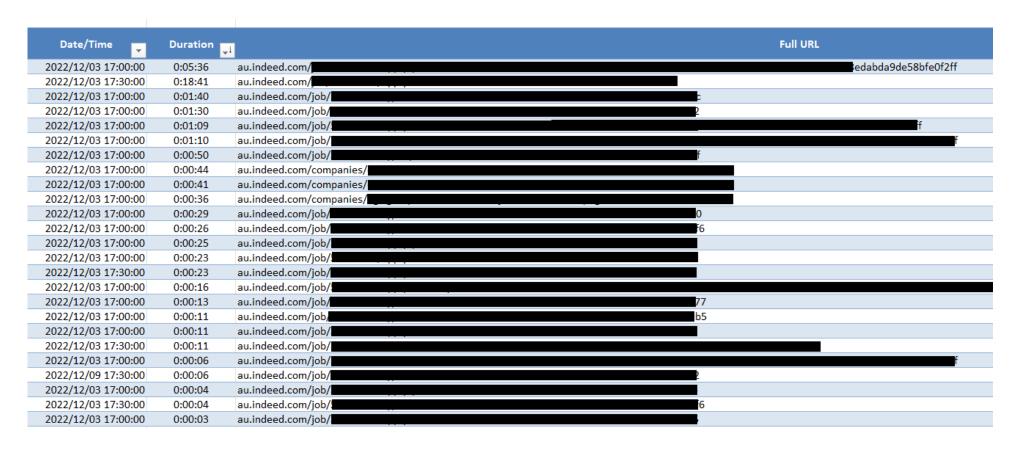
Data copied to 2 distinct unencrypted USBs. Early Morning and on Weekend.

Serial Number	▼	Insertion Date/Time	Removeal Date/Time	Number Files
	531455422	2022-12-18 22:20:16	2022-12-18 00:00:00	<u>9685</u>
	531455422	2022-12-18 09:47:04	2022-12-18 10:20:16	<u>6622</u>
	931222212	2022-12-25 08:31:19	2022-12-25 09:47:04	<u>15633</u>
	931222212	2022-12-25 19:35:33	2022-12-25 20:31:19	<u>8952</u> .



Suspicious User Activity- User 1

Applying for Jobs on Indeed.com the next day.



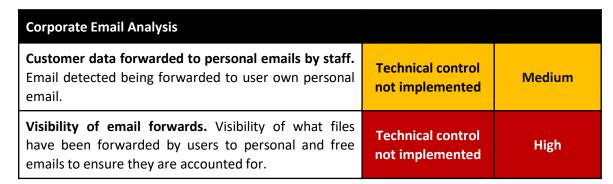


Email Analysis

Covers both Corporate and Personal Email transactions.

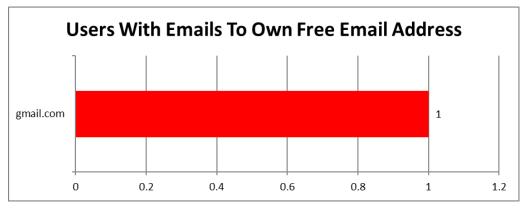


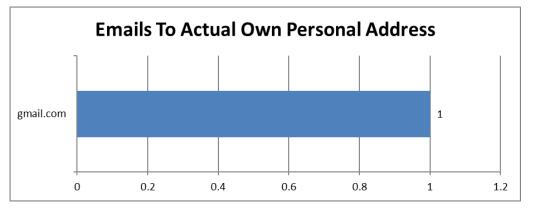
Customer data forwarded to personal emails

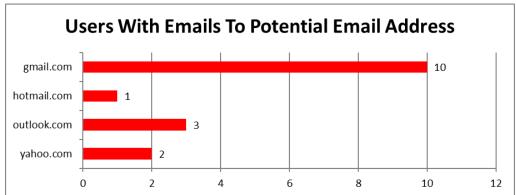


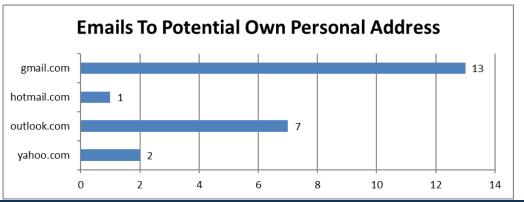
Forwarding emails to personal and other free emails is a common cause of leakage and non-compliance

Risk: Forwarding corporate information to personal emails leads to information creep. The action needs to be checked in the event sensitive information is forwarded to free emails.









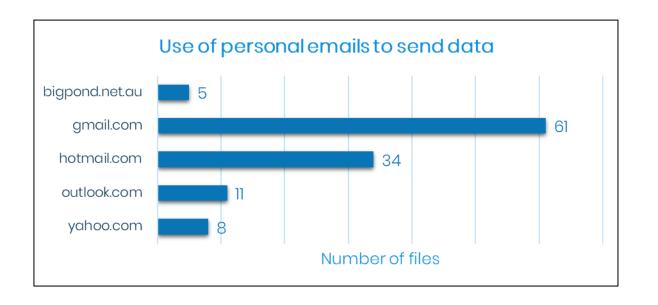


Use of personal emails to send data

Use of Personal Emails					
Use of Personal emails to send corporate data detected. Personal emails have been used to send corporate data.	Technical control not implemented	High			
Visibility of Personal Email Use. Visibility is required to ensure College data is not being sent out via personal emails.	Technical control not implemented	High			

Use of personal emails is a common occurrence in organisations but needs to be monitored as can lead to data leaks.

Risk: Use of personal emails to exfiltrate data out is consistently reported as one of the key ways data is lost or stolen in organisations and needs to be monitored.





Use of Non-Organisational Unauthorised Applications

Non-Compliance of 2 of the ES8 Controls.

- 1. Restrict administrative privileges
- 2. Application control



Installation and Use of Non-organisational applications

Data transfer using non-corporate applications					
Technical Control Circumvented. The users seem to have found a way to install non-organisational applications. Non-Compliance of 2 of the ES8 Controls. 1. Restrict administrative privileges 2. Application control	Failed Technical Control	High			
Visibility of Application Use. Visibility of what applications are being used by users.	Technical control not implemented	High			

The use of personal applications without proper authorization and vetting may be for legitimate reasons, but there are significant risks involved.

Risk. Standard users should not have admin rights to install applications. It can result in malware infection and highlights that the current controls are failing to implement 2 of the ES8 Controls.

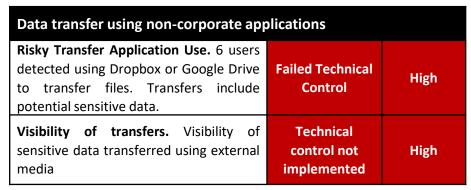
- 1. Restrict administrative privileges
- 2. Application control.

Software Name	Vendor	¥	Number of PCs with Software Present	Number of PCs with Software Usage	Total Usage Duration
MESSENGER.EXE	Facebook Inc.		<u>5</u>	3	1:15:00
TELEGRAM.EXE	Telegram		<u>5</u>	2	0:41:40
WHATSAPP.EXE	WhatsApp		<u>6</u>	2	0:17:30
FILEZILLA.EXE	FileZilla Project		<u>1</u>	1	0:08:41
DROPBOX.EXE	Dropbox, Inc.		<u>8</u>		
OPERA.EXE	Opera Software		<u>2</u>		

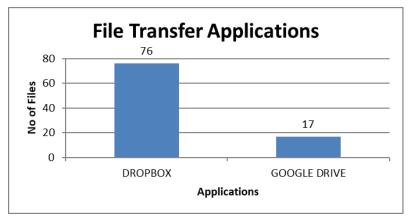


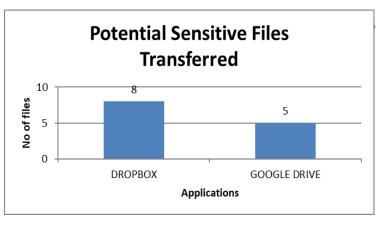
Data transfer using Non-Corporate Data sharing Apps and Websites

PII data transfers using Cloud Applications



The use of personal cloud services and applications may be for





User Name	User Group	Total Events
хххххх	Client Group	<u>34443</u>
ххххх	Client Group	<u>1722</u>
ххххх	Client Group	1428
хххххх	Client Group	<u>17</u>

Risk. Unauthorized access by former staff members. Information stored in personal cloud account remains with its user after he leaves a College and therefore can result in a breach as per NDB Scheme.

Risk. Applications like Dropbox, OneDrive, and Google Drive sync files to any device where a user is logged into these applications. This may include their personal devices or, even worse, those of a different College, which could result in the loss of sensitive information.

29-11-2022	14:03:28 DROPBOX	1231212.docx
29-11-2022	14:03:28 DROPBOX	1-product comparison-latest- jun 2018 copy.xlsx
29-11-2022	14:03:28 DROPBOX	1-product comparison-latest- jun 2018.xlsx
29-11-2022	14:03:29 DROPBOX	1231212_00.docx
29-11-2022	14:03:29 DROPBOX	1231212_00_11.docx
29-11-2022	14:03:29 DROPBOX	amex2222_3.xls
29-11-2022	14:03:29 DROPBOX	az-100.docx
29-11-2022	14:03:30 DROPBOX	capture.png
29-11-2022	14:03:30 DROPBOX	claim - copy.xls
29-11-2022	14:03:43 DROPBOX	client4.4.0.10 - lc-temora.msi
29-11-2022	14:03:56 DROPBOX	contract form.doc
29-11-2022	14:03:56 DROPBOX	creditcard.docx
29-11-2022	14:03:57 DROPBOX	customer info.xlsx
29-11-2022	14:03:57 DROPBOX	customer_info.docx
29-11-2022	14:03:58 DROPBOX	customer_offer letter.docx

Page 26 www.guardware.com.au



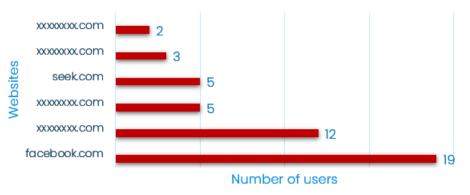
Data transfer using Non-organisational websites

Data transfer using non-corporate applications			
Risky website Use. 19 users detected using Facebook and potentially transferring data.	Technical control not implemented	High	
Visibility of transfers. Visibility of sensitive data transferred using APPs and encrypted websites.	Technical control not implemented	High	

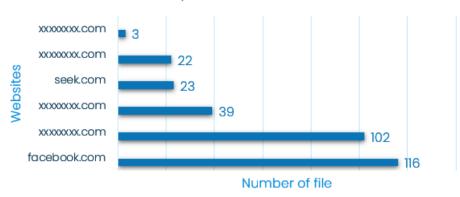
Transferring of files to non-corporate websites may be for legitimate reasons, but there are significant risks involved.

Risk. Can result in a breach if sensitive or PII data is uploaded to non-corporate websites either accidentally or due to malicious intent.

Number of users who transferred to top 6 noncorporate domains



Number of files transferred to top 6 noncorporate domains





Printing Analysis

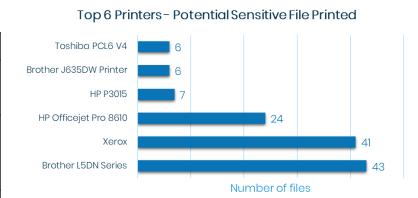


Printing of PII Information

Printing of Sensitive Data		
Printing of potential sensitive data. Printing of sensitive data was observed.	Technical control not implemented	Medium
Printing use personal Printers. As users are allowed to work from home there is risk of files being printed using home printers.	Technical control not implemented	Medium
Visibility of Printing. Visibility of what files have been printed either via organisational or personal printers to ensure they are accounted for.	Technical control not implemented	Medium

The use of these printers may be for legitimate reasons but can result in a breach.

Risk. According to ACSC Loss of printed information is a common occurrence leading to a data breach. As such printing of material needs to be monitored and controlled. Users should be made responsible for the security of printed materials. All printing events need to be monitored.



Printer Name Total E	vents
\\rbcmon02\ -Office	<u>25</u>
\\RBCPRN01\ -Office	<u>22</u>
\\rbcprn01\ Office	<u>19</u>
\\RBCPRN01\ -Office	<u>12</u>
D-Accounts	<u>6</u>
Microsoft Print to PDF	<u>5</u>
\\rbcmon02\ -Office2	<u>5</u>
\\rbcprn01\ -Office	<u>5</u>
Microsoft Print to PDF	6 5 5 4 3 3 2 2 2 2 2 2 2 1 1 1 1 1 1 1
\\rbcprn01\ -Manager Office	<u>3</u>
Canon TS3300 series	<u>3</u>
OneNote for Windows 10	<u>2</u>
Adobe PDF	<u>2</u>
\\RBCPRN01\ -Office	<u>2</u>
I Block Lv2 Toshiba	<u>2</u>
-Admin	<u>2</u>
HP8A771D (HP Officejet Pro 6830)	<u>2</u>
\\rbcprn01\ -Office	<u>1</u>
Adobe PDF	1
HPBBF063 (HP OfficeJet Pro 8710)	<u>1</u>
\\RBCPRN01\ -Office	1
	<u>1</u>
HP000756 (HP Officejet 6600)	1
Brother HL-1110 series	<u>1</u>
Adobe PDF	1
Brother MFC-L3750CDW series Printer	<u>1</u>
\\RBCPRN01\ -Office	1
\\rbcprn01\ -Office	1
Canon MG6200 series Printer XPS	1

Page 29 www.guardware.com.au



Access of files



Access of files

Access of information		
Authorised Access of sensitive Information. Ensuring authorised users can access files	Implemented	No Risk
Access Visibility. Visibility of who is accessing what files	Implemented	No Risk

The College has visibility and means to validate if authorised users are accessing sensitive data.

DLP File Access Incidents by Rule Name		
Rule Name	▼ mber of ▼	Number of Files 🔻
	<u>79</u>	<u>1086</u>
Document Access	<u>146</u>	<u>19567</u> .



Page 31 www.guardware.com.au



Recommendation to Reduce Risk

High Priority

The College's users are exhibiting several risky behaviours when dealing with College data. These are putting College IP at serious risk and can easily result in a Breach. There is a need to monitor and control these activities.

Implement a User activity Monitoring, Data Egress/leak Monitoring solution which can monitor and alert "sensitive data" in the following use cases:

- Access of sensitive files
- Transfer using corporate channels like emails and cloud.
- Transfer using any personal online sources like free emails, cloud, and web uploads.
- o Transfers using encrypted personal chats like WhatsApp.
- o Data shared out directly from cloud shares.
- Printed using corporate and personal printers.
- Transfer using offline sources like USBs, phone sync etc.
- Locate laptops containing Sensitive PII data
- Monitor and control syncing of data using wireless methods like Bluetooth and Mobile Sync apps.
- Ability to monitor when user's circumvent College policy.
- Monitor use of unauthorized College applications.
- Monitor access of risky websites.
- o Ability to monitor 24/7 even not connected to corporate network or offline.



Recommendation to Reduce Risk

High Priority

• Implement a staff awareness program around the identified risks. The OAIC's **Guide to Securing Personal Information** sets out expectations that Entities should ensure they foster a privacy and security aware culture, such as through staff training and awareness exercises.

High Priority

- The College is recommended to complete their IT Security Policy. It is recommended that the IT Security policy covers the following areas:
 - Privacy Policy
 - Acceptable Use Policy
 - Authentical Policy
 - Password Policy
 - MFA Policy
 - Access control and Authorisation Policy
 - Data Protection Policy
 - Data classification
 - Asset register
 - Protection of assets
 - Communication and Data Transfer Policy
 - Email Policy
 - Chat
 - Media transfer
 - Other communication mechanisms.
 - Mobile Device Protection and Management Policy
 - Mobile device management
 - Mobile device encryption

- Configuration and Vulnerability Management
 - Patching (which will include OS, and applications)
 - Application Control
 - User application hardening
 - MACRO management
 - AV configuration
- o IT equipment Purchase, Deployment and Disposal Policy
- Clean Desk Policy
- Business Continuity Policy
 - Business Continuity Plan.
 - Backup and recovery strategy
- Supplier Management Policy
- User education and awareness policy
- Data Breach Response Plan



Recommendation to Reduce Risk

High Priority

- College should aim to meet a minimum maturity of level 1 for ACSC essential 8 controls. The following essential 8 controls are considered of higher importance:
 - Application control
 - Patch applications
 - Patch Operating System
 - Restrict administrative privileges

Medium Priority

- The following essential 8 controls are considered of medium importance:
 - Backup
 - Configure Microsoft Office macro settings
 - User application hardening

GuardWare offers products designed to keep your data safe and can help implement the recommendations in this report.



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