

FTC Safeguards Rule Compliance Checklist

- Written information security program created and regularly reviewed
- Qualified individual designated to oversee security program
- Completed risk assessment covering all areas of customer data
- Access controls in place based on role and business need
- Multi-factor authentication (MFA) enabled on all customer data systems
- Data encryption implemented at rest and in transit
- Ongoing employee cybersecurity awareness training program
- Monitoring tools deployed or annual penetration test completed
- Vendor contracts reviewed for data protection standards
- Written incident response plan developed and ready to implement
- Breach notification procedures in place for reporting within 30 days