



## The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth  
Securities Division

### **SURVEY REGARDING CYBERSECURITY PRACTICES OF MASSACHUSETTS REGISTERED INVESTMENT ADVISERS**

#### **Instructions/Glossary**

For purposes of this survey, the terms “*you*”, “*your*” or “*firm*” mean the recipient’s Massachusetts-registered investment adviser firm. For purposes of this survey, the term “*related person*” includes any and all of the firm’s officers, partners, directors, employees, or any person performing similar functions.

*You* may complete the survey by hand-writing the responses on the pages enclosed or by using a word processor to create a document containing responses to the Division’s questions.

#### **Identifying Information**

Firm Name: \_\_\_\_\_ (required)

Firm CRD Number: \_\_\_\_\_ (required)

My firm has its principal office and place of business in Massachusetts.    Y    N (circle one)

#### **Questions**

(1) Does your firm require authentication to access electronic data storage devices?

Yes                                       No – Proceed to question (3)

(2) What forms of authentication are required?

- Single factor authentication (ID/ Password)
- Dual factor authentication (Key FOBS, secure IDs)
- Adaptive factor authentication (Challenge questions)
- Biometric authentication
- Other authentication, identify: \_\_\_\_\_

- (3) Does your firm allow remote access to servers or workstations via a virtual private network (VPN) or similar technology?
- Yes  No
- (4) Does your firm inventory all electronic data storage devices?
- Yes  No
- (5) Does your firm utilize laptop or tablet computers, or other portable electronic devices?
- Yes  No – Proceed to question (5)
- (6) Is the encryption software installed on all laptop or tablet computers, or other portable electronic devices?
- Yes  No
- (7) Identify the encryption software vendor: \_\_\_\_\_
- (8) Does your firm utilize antivirus software?
- Yes  No – Proceed to question (7)
- (9) Identify the antivirus software vendor: \_\_\_\_\_
- (10) Is the antivirus software installed on all fixed workstations and portable electronic devices?
- Yes  No
- (11) How often are updates downloaded to the antivirus software?
- Weekly  Monthly  Quarterly  Annually
- Other Specify: \_\_\_\_\_
- (12) Does your firm utilize on-line or remote backup of electronic files?
- Yes  No
- (13) Identify the on-line or remote backup vendor: \_\_\_\_\_

- (14) Describe the process employed for disposal of hard drive or electronic data storage devices: \_\_\_\_\_
- (15) Who is responsible for the maintenance of your information technology systems?
- Employees  External vendors
- (16) Has your firm entered into confidentiality agreements with external service providers accessing your firm's information technology systems?
- Yes  No
- (17) Has your firm assessed third party service providers (i.e., custodians, sub-advisers, etc.) compliance with information technology security?
- Yes  No
- (18) Has your firm created and implemented a written information security program in compliance with 201 MASS. CODE REGS. 17.00 ("Standards for the Protection of Personal Information of Residents of the Commonwealth")?
- Yes  No
- (19) During your firm's most recent fiscal year, what percentage of your firm's operating budget was dedicated to, or consumed by, information technology security?
- < 1%  1-3%  3-5%  > 5%
- (20) Does your firm maintain any insurance coverage for cybersecurity?
- Yes  No
- (21) Does your firm contact clients via e-mail or other electronic messaging?
- Yes  No
- (22) Does your firm use any procedures to authenticate instructions received from clients via e-mail or other electronic messaging?
- Yes  No
- (23) If new regulations or procedures are implemented by the Division to enhance cybersecurity, what financial impact do you anticipate these having on your firm?
- None  Minimal  Moderate  Significant