

IN THE LAST YEAR, HAS YOUR AGENCY'S...

Staff size grown to more than 9 employees including independent contractors?

AND

NYS gross annual revenue grown to \$5 million or more in each of your last 3 fiscal years?

AND

Total assets grown to \$10 million or more?

If the answer to **all 3** is **“YES,”** then your agency is no longer eligible for the limited exemption under New York’s Cybersecurity Requirements for Financial Services Companies regulation. Within 6 months of the end of your fiscal year, you must:

- Appoint a Chief Information Security Officer or hire a contractor to act as one
- Implement network penetration testing and vulnerability assessments
- Maintain systems to reconstruct material financial transactions
- Maintain “audit trails” to enable you to detect and respond to serious network breaches
- Implement procedures for securely developing your own mobile applications (if any) or for evaluating a contractor who does it for you
- Hire cybersecurity staff or contractors and keep them trained and their knowledge updated
- Implement multi-factor authentication
- Train staff on cybersecurity practices and monitor their adherence to them
- Encrypt private data
- Create a cyber incident response plan

Visit www.biginny.org/cyber for more information and resources to help you comply.