AGIO SEC CYBERSECURITY GOVERNANCE PROGRAM

Over 80% of Registered Investment Advisors rank cybersecurity as their top compliance challenge – and have done so for the past 5 years. Why? Because while the need for cybersecurity is growing, your resources are not. But investors and your C-Suite aren't interested in excuses; they want to know what you're doing about cybersecurity right now. Meanwhile, the SEC continues to track the situation, first issuing the 28-item OCIE Risk Alert in 2014, followed by subsequent Guidance Updates in following years. Then enter regulation like GDPR, and it becomes abundantly clear the United States will be forced to follow suite with its own regulatory mandate in the future.

These are all problems internal IT and security teams face on a daily basis. We have a solution. The Agio SEC Cybersecurity Governance Program.

THE PROGRAM

Our 24-month program is a proactive, methodical approach to cybersecurity, under the direction of a CISO, that aligns with best practices and SEC Risk Alerts to drive you toward a 360° robust and compliant cybersecurity posture. We offer high impact assessments to evaluate the maturity of your firm's information security program, prioritize recommended corrective actions, deliver key policy documents, conduct comprehensive testing of your security technologies and processes, systematically test and train your end-users to be secure, along with monthly CISO-led updates and discussion for overall program guidance and oversight. That's a mouthful – so is our program – and you'll want to be armed with it when regulators and investors come knocking on your door, asking "what about cybersecurity?"

WHAT YOU GET

We begin specifically by evaluating your firm's information security program, policies, workflows, security architecture, and user awareness. These functional areas are then measured against the NIST Cybersecurity

Framework and the 28 areas of interest from the SEC OCIE Risk Alert. Consider the first six months of the Agio SEC Cybersecurity Governance Program as an intense boot camp, where we provide you with deliverables to help you respond to investors and the SEC Risk Alert. The remaining 18 months is training and conditioning, helping your firm develop tier one cybersecurity habits.

Your program in its entirety includes the following:

- Security Risk Assessment
  - With SEC Mock Audit
  - Based on NIST framework
- Penetration Testing
- Policy Review & Development
- Social Engineering Testing: Phishing, Pretexting, USB Drive Baiting, Physical Office Security, etc.
- Incident Response Testing (Tabletop Exercises)
- Security Awareness Training (Seminar Format)
- Security Architecture Review
- Audit Assistance
- Proactive Monitoring
- Monthly Security Strategy Review Calls

SEC Mock Audit Deep Dive

One of the most critical elements of our program is our SEC Mock Audit. It provides you the most definitive depiction of how your firm will perform should the SEC choose to audit you with regards to your cybersecurity efforts. Here's our process:

Step 1: We review and assess your firm against the SEC's six areas of focus:

1. Governance and Risk Management
2. Access Rights and Controls
3. Data Loss Prevention
4. Vendor Management
5. Training
6. Incident Response (IR)

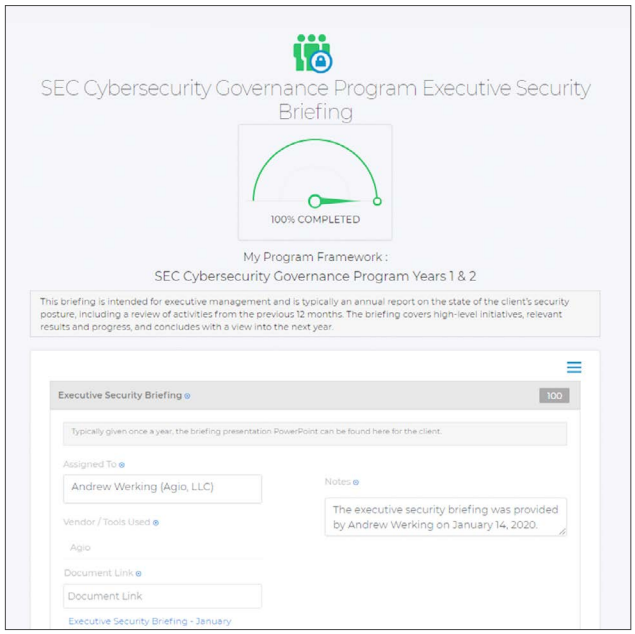
Step 2: We evaluate you against the eight control categories identified in all cybersecurity best practices:

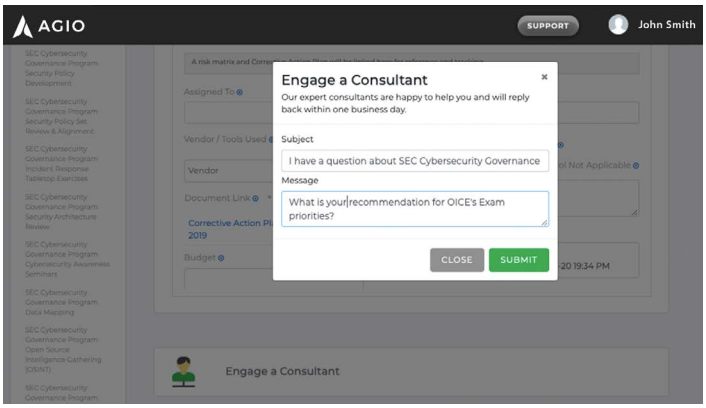
1. Network Security
2. Data Protection
3. Access Control
4. System Development, Acquisition, and Maintenance
5. Malicious Code
6. System Hardening

7. Security Testing and Monitoring
8. Security Policy

Step 3: We cross-reference your dual-results against the SEC's multiple Risk Alerts to paint a clear picture of where your firm stands with regards to the SEC's expectations.

Your Real-Time Portal





CISO GUIDANCE & OVERSIGHT

Since the inception of the Agio SEC Cybersecurity Governance Program, other providers have rolled out copycat programs, however none of them offer a program led by an experienced Cybersecurity Information Security Officer (CISO). We do. Each one of our clients receives a virtual CISO to lead and oversee their program. This means forward-thinking guidance, monthly check-ins, long-term discussions on the direction of your firm, and advice on short-term decisions and tactical execution required to get you from point A to point B. This also means you have access to your vCISO at any time, especially when it comes to sitting in on board meetings, investor calls, or regulatory inquiries – something we do on a regular basis to ensure our clients are buttoned up for all of their stakeholders.

PROJECT MANAGEMENT

Cybersecurity preparedness demands a month-in, month-out commitment to habitual activities that fortify your environment. In addition to your vCISO, and to ensure you stay on track, our service includes a committed Project Manager to oversee your program in its entirety. This means you have someone recording and documenting all of the meetings, activities, and improvements we make together to your environment over those two years. Our clients find this particularly useful when managing requests from investors and regulatory bodies.

Bottom line, there's nothing we haven't thought of when it comes to your Agio SEC Cybersecurity Governance Program, and to ensure we don't lose sight of the future, we continuously monitor compliance shifts in the landscape, new and emerging threats, as well as overall bad actor behavioral trends; all of which we use to tweak and adjust your program in real-time so you can rest easy knowing your governance is as strong as it will ever be. Join us.

WHY AGIO?

#OneAgio

When you select Agio, you're investing in a relationship with everyone who's a part of this firm. Our teams operate in a symbiotic relationship, based on deposits and withdrawals, that creates a vehicle for delivering more than just service. We deliver an experience that reaffirms to our clients we've got them covered. From clean, concise implementations; to consistent support backed by automation and tools that work the way they're supposed to; to value-add reporting; to accurate, timely invoicing; and content on the latest IT and cybersecurity trends, we bring the full breadth and depth of our talent to bear. We deliver #OneAgio.

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