Safeguarding Health Information
NIST/OCR Conference
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Federal Trade Commission

The views expressed are those of the speaker and not necessarily those of the FTC

START WITH SECURITY

LESSONS LEARNED FROM FTC CASES

START WITH SECURITY
A GUIDE FOR BUSINESS
FEDERAL TRADE COMMISSION | BUSINESS.FTC.GOV

1 Start with security.

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- Don’t collect personal information you don’t need.
- Hold on to information only as long as you have a legitimate business need.
- Don’t use personal information when it’s not necessary.

2 Control access to data sensibly.

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- Restrict access to sensitive data.
- Limit administrative access.

3 Require secure passwords and authentication.

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- Insist on complex and unique passwords.
- Store passwords securely.
- Guard against brute force attacks.
- Protect against authentication bypass.

4

Store sensitive personal information securely and protect it during transmission.

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- Keep sensitive information secure throughout its lifecycle.
- Use industry-tested and accepted methods.
- Ensure proper configuration.

5

Segment your network and monitor who's trying to get in and out.

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- Segment your network.
- Monitor activity on your network.

6

Secure remote access to your network.

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- Ensure endpoint security.
- Put sensible access limits in place.

7

Apply sound security practices when developing new products.

7 Control access to data sensibly.

- Train your engineers in secure coding.
- Follow platform guidelines for security.
- Verify that privacy and security features work.
- Test for common vulnerabilities.

8

Make sure your service providers implement reasonable security measures.

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- Put it in writing.
- Verify compliance.

9

Put procedures in place to keep your security current and address vulnerabilities that may arise.

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- Update and patch third-party software.
- Heed credible security warnings and move quickly to fix them.

10

Secure paper, physical media, and devices.

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- Securely store sensitive files.
- Protect devices that process personal information.
- Keep safety standards in place when data is en route.
- Dispose of sensitive data securely.

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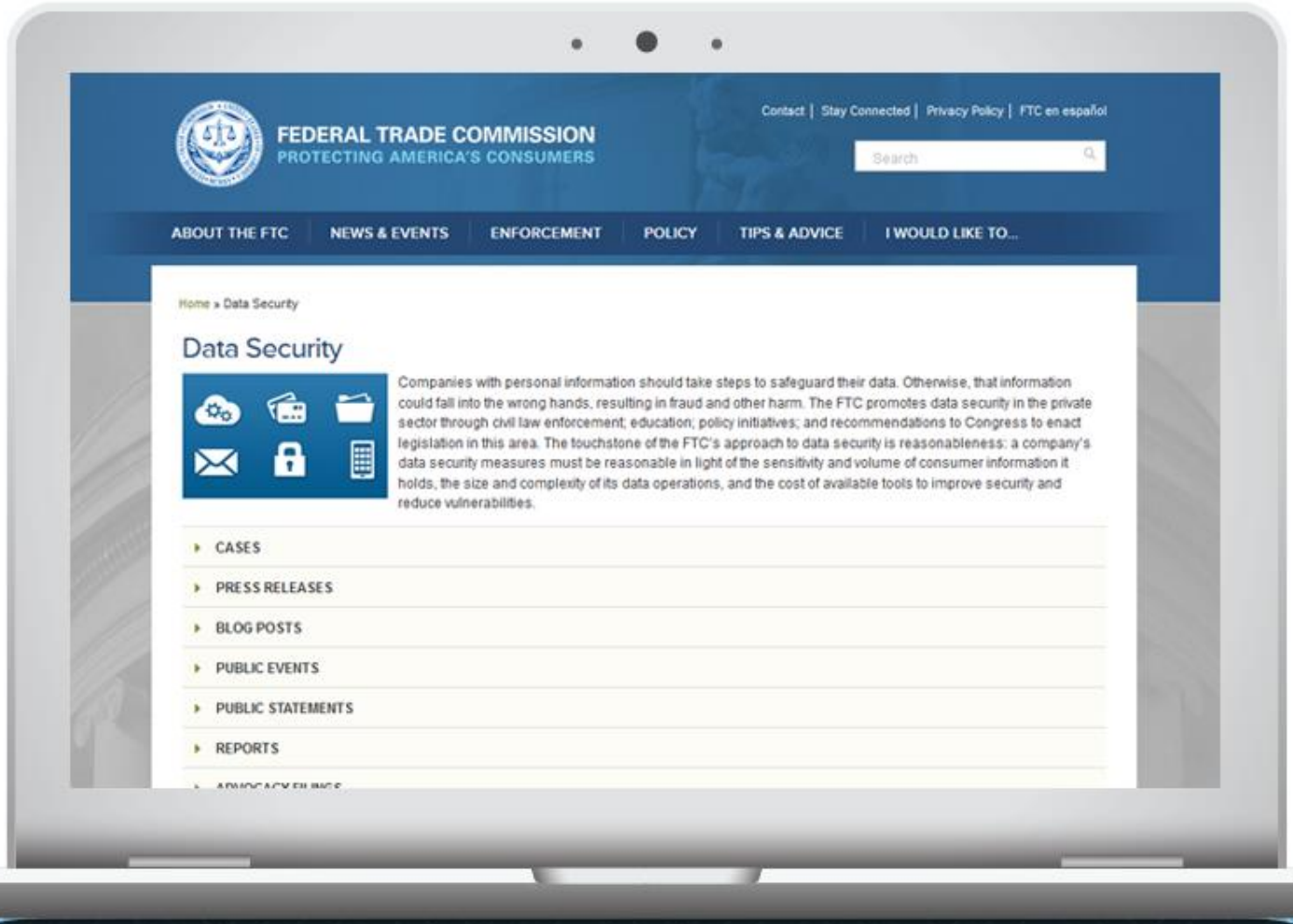

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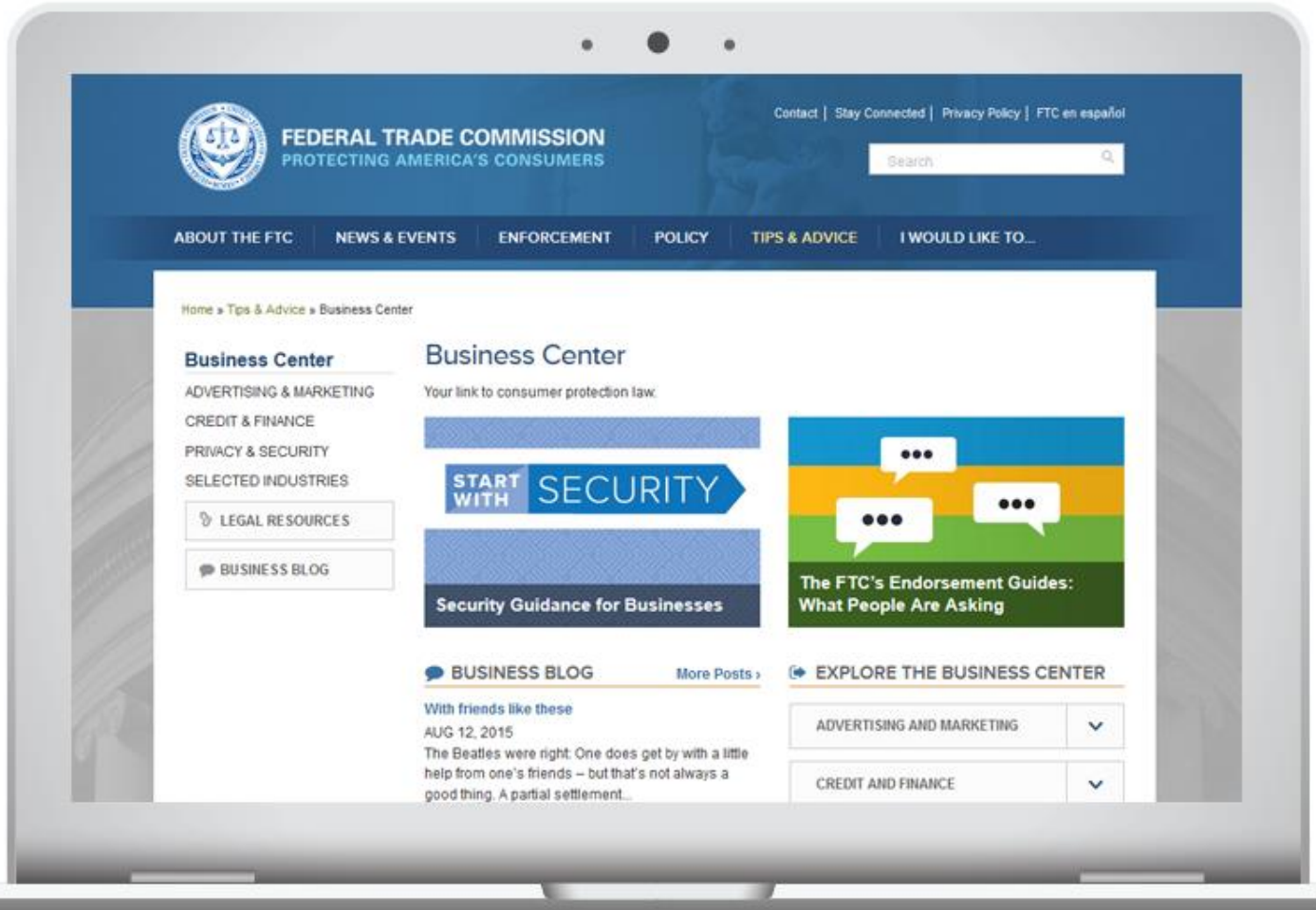

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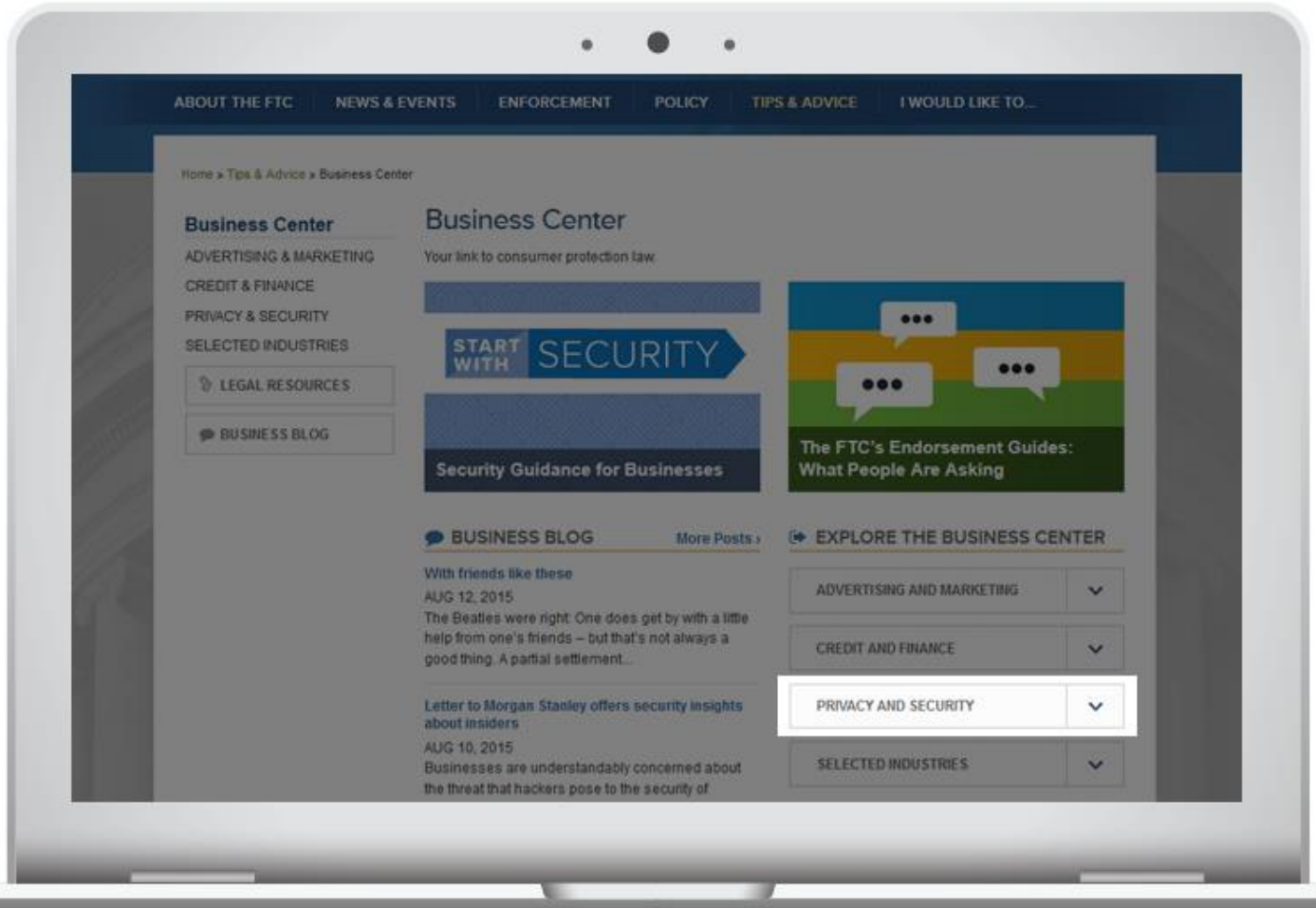

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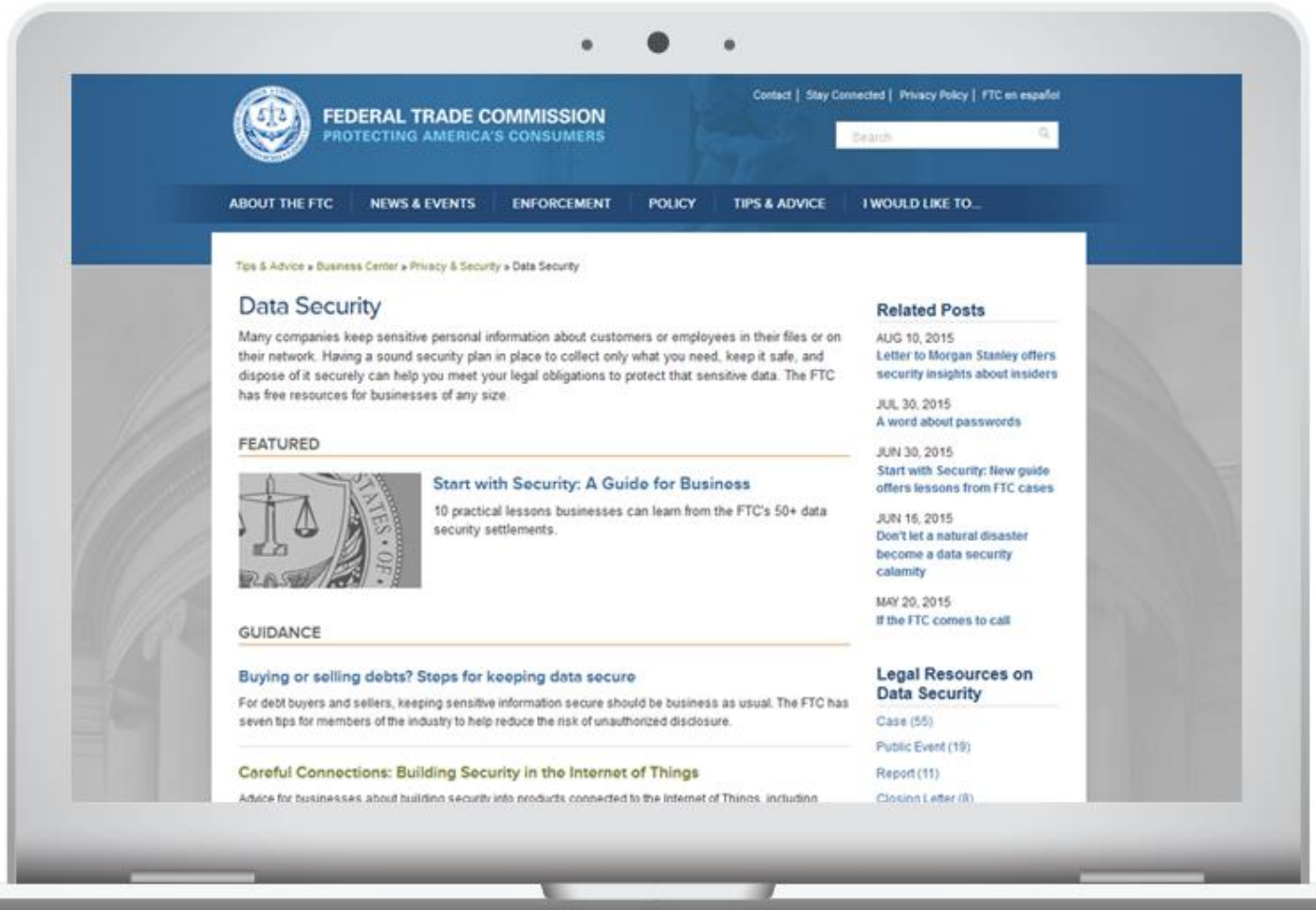

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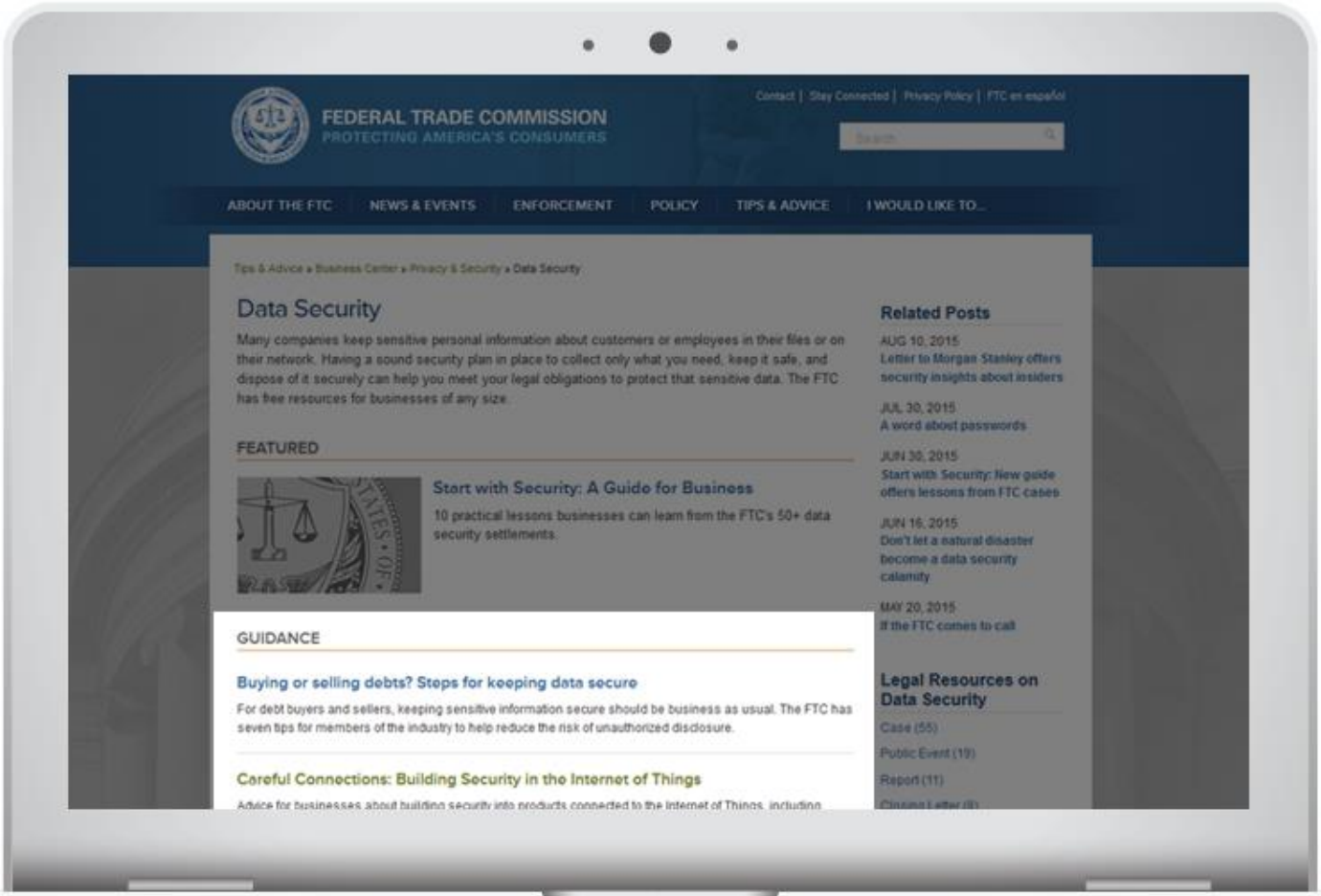

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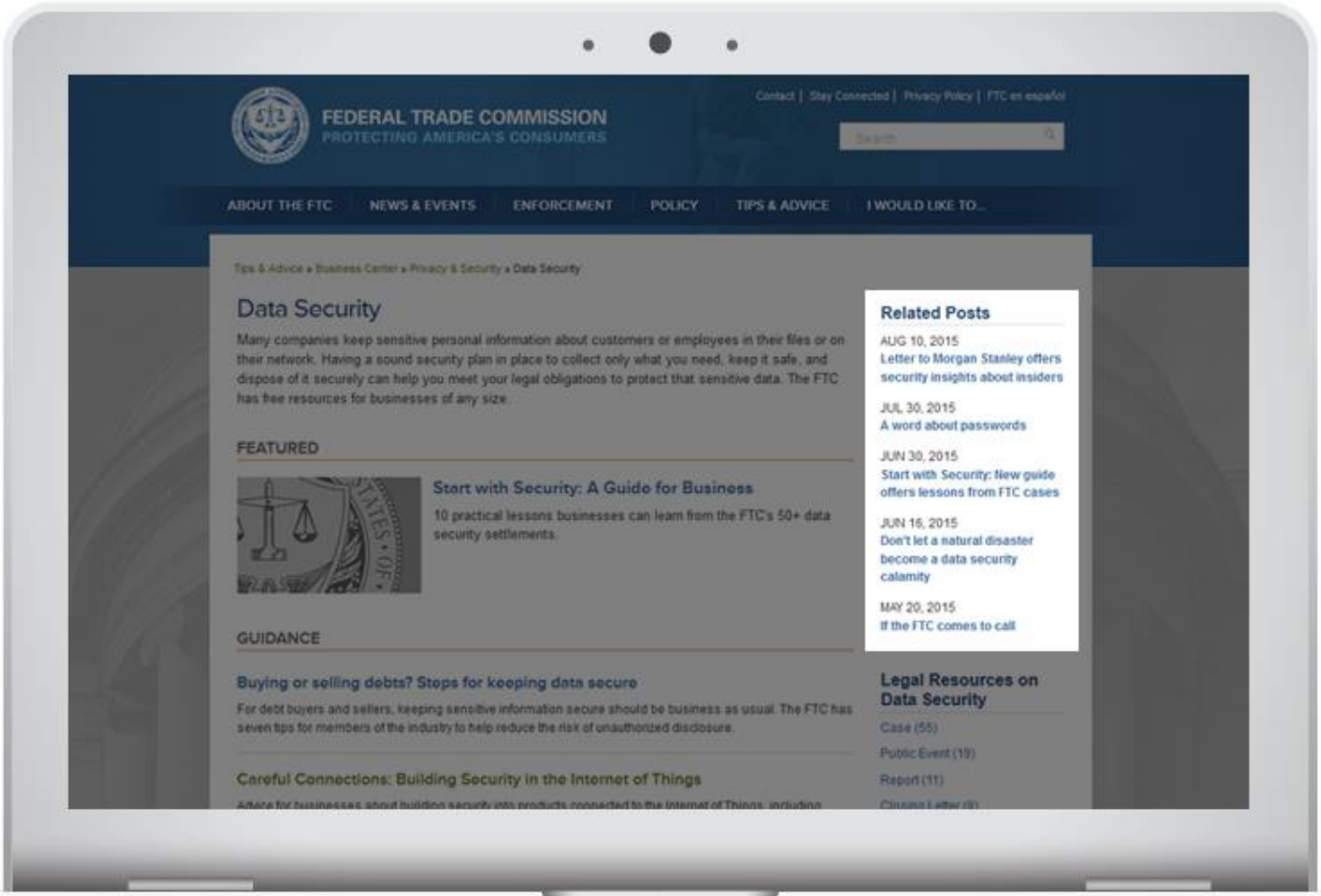

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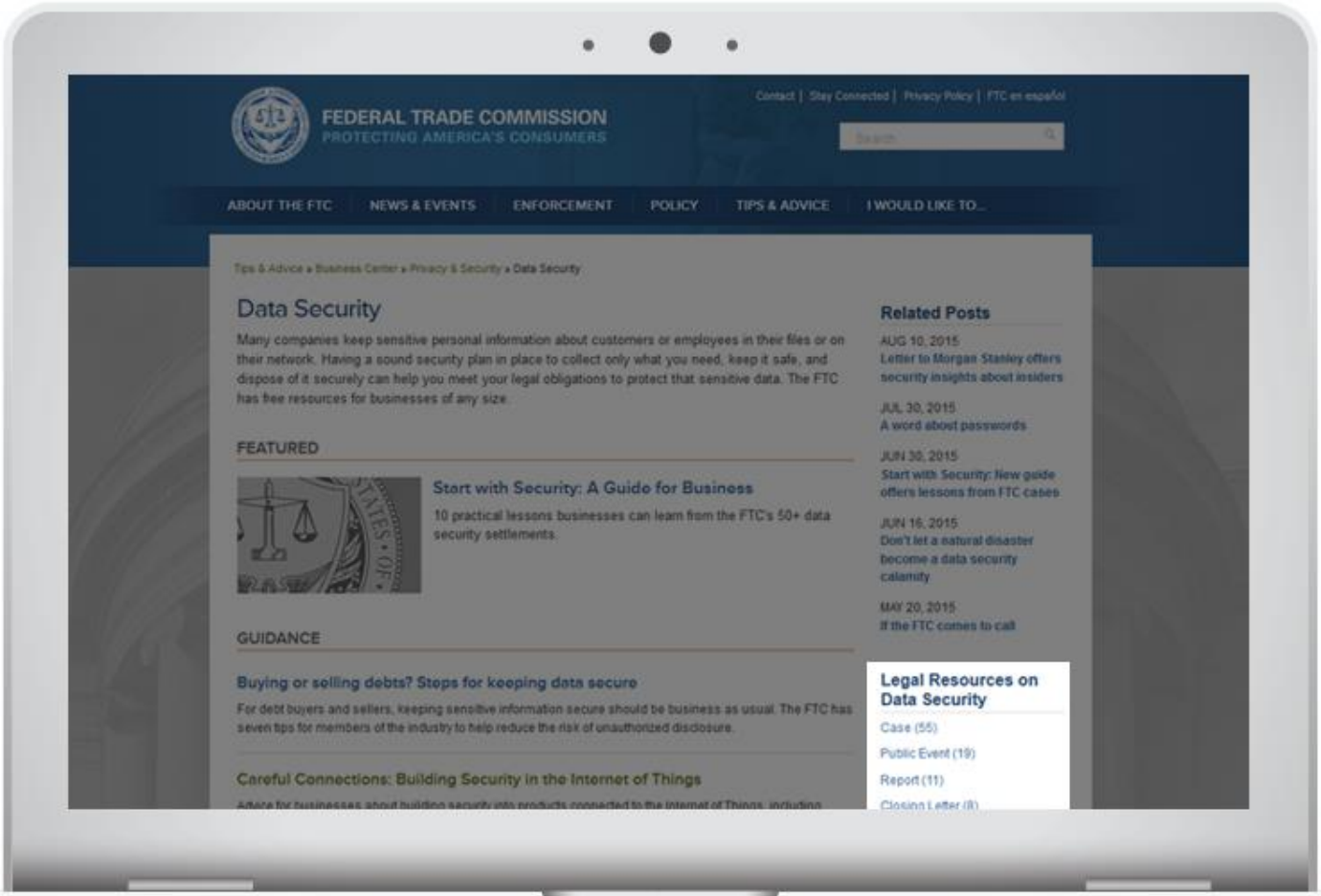

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