

Subject: MAC Committee – Security & Compliance

When: April 10, 2019

Committee Chair: Denise Pappu (Wells Fargo)

Attendees:

McCracken

- Kim Cooper (kim.cooper@mccrackenfs.com)
- Shari Hartwell-Cook (Shari.Hartwell-Cook@McCrackenFS.com)
- Karla Ferguson (Karla.Ferguson@McCrackenFS.com)
- Karen P
- Denise Ross
- VJ Bernier

VHDA

AMPF

Wells Fargo

Sterling Bank

Berkadia

Columbia

HomeStreet

Trimont

Red Capital

Key Bank

CBRE

Fannie Mae

Graystone

CapOne

Chase

Discussion Items / Meeting Minutes

- Denise R & VJ to join the call
 - Denise R & VJ want to understand topics
 - Infrastructure vs Application
 - Outline the different asks so they can pull right resources for topics
 - Topics from last calls
 - **Configuration Changes**
 - Failed login messages (Steve Armstrong – Chase)
 - Security policies are asking for generic messages vs showing login information
 - Coming from internal and external audits – needs to be generic
 - Will be in next release – there is a job/heat for this
 - CS and Portal needs to have same changes
- Connection Pool

- Connection pool is not ending within x minutes which is presenting incorrect dates/times for File Maintenance date/timing (Denice Doce)
- Existing job available
 - There is a temporary fix available. Long term fix underway. It is not going to pick up from connection pool id but pull from user. Next release should have fix.
- Can be an audit issue for file maintenance
- MFS needs to make a change to auto disconnect
 - Check with MFS on the job so all customers can take advantage
- Is there a way to show the user id in pools who the user is when they are signed onto Portal? Need better way to see who is signed into the Portal.
 - If assistance needed call ASP when in shared environment.
- Web application firewall
 - TLS1.2
 - Questions around configuration and how MFS is ensuring protection per security analyst requirements
 - VJ –
 - TLS1.2 – nested under firewall
 - Encryption standard
 - Forces browsers to use that
 - Load Balancers do have encryption
 - Web application firewalls
 - Code level updates recently done – allow turning on application rules for encryption. Base Rules.
 - Due dates for each customer is underway
 - Process to update is underway for a customer currently.
- Multi-factor authentication – this is a need by many companies. How can this be obtained and when? It will need to be per customer request.
 - Greystone, Trimont, Columbia, Chase
 - High business entailments – like approval for cash disbursements (Steve – Chase). Can it be at module level?
 - MFS working on this on Portal side. Looking at product to implement. Customers outside of ASP may need other work/discussions. Steve to reach out VJ.
 - Wiring projects underway will have this ability
- Other Portal security concerns:
 - Invalidate cookies when user logs out?
 - Security concerns
 - Invalidate session id when user logs out?
 - Accessibility from home locations vs work

- Firewall settings / IP restrictions
 - Work computer vs personal – multi-factor authentication plays into this
 - This can relate to how each customer's internal network team identifies IP restrictions (white list)
 - Denise Doce has these questions on their annual survey that can provide more details to the ask.
 - **Audit reporting**
 - SOC 2
 - Auditors are asking
 - Key/Columbia/Graystone, plus
 - Would like MFS to provide what the SOC2 will cost vs SOC1
 - MFS did a preliminary assessment
 - MFS would like to reduce number of vendor assessments if possible
 - SOC1 would still be needed
 - No timeline for SOC2
 - Report listing of disabled users (Disabled = Why, time, who, also ID status, who disabled the profile, the program that disabled the profile)
 - Custom report for Denise Doce now
 - Audit concern for all customers
 - Custom Report for users can be requested
 - Defined timeline for Medium Findings to be remediated from audits
 - Timeframes needed for findings
 - Companies are providing standards – would like to have better timeframes
 - Is there a way to “share” common items between companies that will not conflict with customer privacy?
 - Shared environments – penetration testing
 - Is that occurring? How/when can customers get results for auditors?
 - Penetration Testing – MFS had a meeting with customer. Results were loaded into MFS system to track. Summary report was sent out recently. MFS internal policy not to give it out detailed.
 - **Vulnerabilities**
 - Information Security Red Team
 - Question to MFS – so how is MFS managing for vulnerabilities for all customers? Do they have a database that houses the information for reporting?
 - MFS reporting/remediation tool. Reviewed monthly with Denise R for timing. Scanning managed by VJ monthly and reviewed with Denise R quarterly. Exception process followed. Policy available for customer to obtain.
 - Recommend Mirco join a roundtable discussion at conference to present the behind the scene process.

- Cyber Security / Cyber Resilience program
 - Proactive disciplines
 - Threat analytics
 - Advanced malware protection
 - DDoS protection
 - Reviewed annually and updated for emerging threats?
 - Integrated with Incident Response program?
 - Conduct cyber security exercise?
 - VJ – Team manages. More structure to be worked on with consultant. They (VJ and Mirco) are building a program and hope to be done later this year.
 - Move out as a separate topic
 - Other groupings
 - GDPR –
 - General Data Protector Regulation – Is MFS prepared or able to manage this? Who manages actual data will need to remove that data from Strategy per customer request.
 - Auditors are started to review/ask about this
 - Denise R – MFS has started work with GDPR, working with MFS contractual – is MFS in alignment. No different security changes. Just contract write-up change is needed.
- Open Discussion
 - Any new items?
 - ADA compliant
 - What are the changes needed per customer?
 - In the past when asked by customers, MFS did not make changes since Strategy was not consumer facing
 - Borrower Inquiry is not ADA Compliant at this time
 - Employee needs are now being looked at for ADA compliant
 - MFS would need to implement many changes – Sub-committee to be started for discussion after results of survey
 - MFS noted a lot of changes
 - MFS to reach out to customer base to as who needs to be ADA compliant

Tasks:

- MFS conference
 - Roundtable on Security/Config for infrastructure (VJ/Micro/others)
 - Configuration
 - Vulnerabilities
 - Cyber Security / Cyber Resilience
 - Audit Needs
 - Kim Cooper to send out survey to all customers asking about ADA compliance needs
 - Strategy needs – employee
 - Borrower Inquiry – customer facing
 - Who is interested in being on sub-committee to discuss needs/requirements?

Next Meeting – June 12th, 2019 @ 3pm ET --- Look out for new meeting planner!