



Pragmatic Compliance

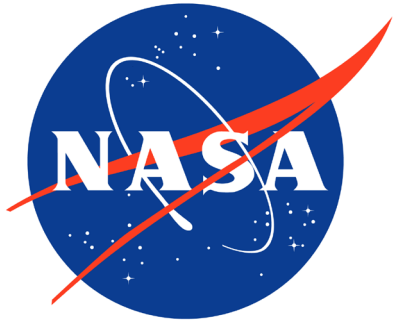
Rebecca (Becca) Allen Diamond, Director of Product, Zyston

ISC2 East Bay 2024 Fall Conference

November 8th, 2024



BLUELAVA
MANAGING THE BUSINESS OF SECURITY



ZYSTON
BEYOND THE ALERT



EY

Have our investments in GRC made us safer?

1. Compliance's Role in the Organization
2. The organization's approach to compliance
3. The compliance frameworks

Keep me off the
sh*t list

Have our investments in GRC made us safer?

Compliance's Role in the Organization



Embracing a culture of communication moves us closer.

Don't start with NO

- ✓ Understand the need and tell the business how they can do what they want to do
- ✓ Understand the business drivers and how your compliance program fits in
- ✓ Get away from FUD (Fear, Uncertainty, and Doubt) messaging

Have our investments in GRC made us safer?

Pragmatic

By Definition:

*Cambridge Dictionary online <https://dictionary.cambridge.org/us/dictionary/english/pragmatic>



“solving problems in a sensible way that suits the conditions that really exist now, rather than obeying fixed theories, ideas, or rules”*

The organization's approach to compliance

- Business Case
- Risk Case
- Negotiating with your Assesor
- Negotiating with your Business



Have our investments in GRC made us safer?

The organization's approach to compliance



Using risk-based decision-making moves us closer

There is no one “correct” approach

There will be multiple answers; You may not like any of them

Evaluate the resources available and realistically determine which approach is best

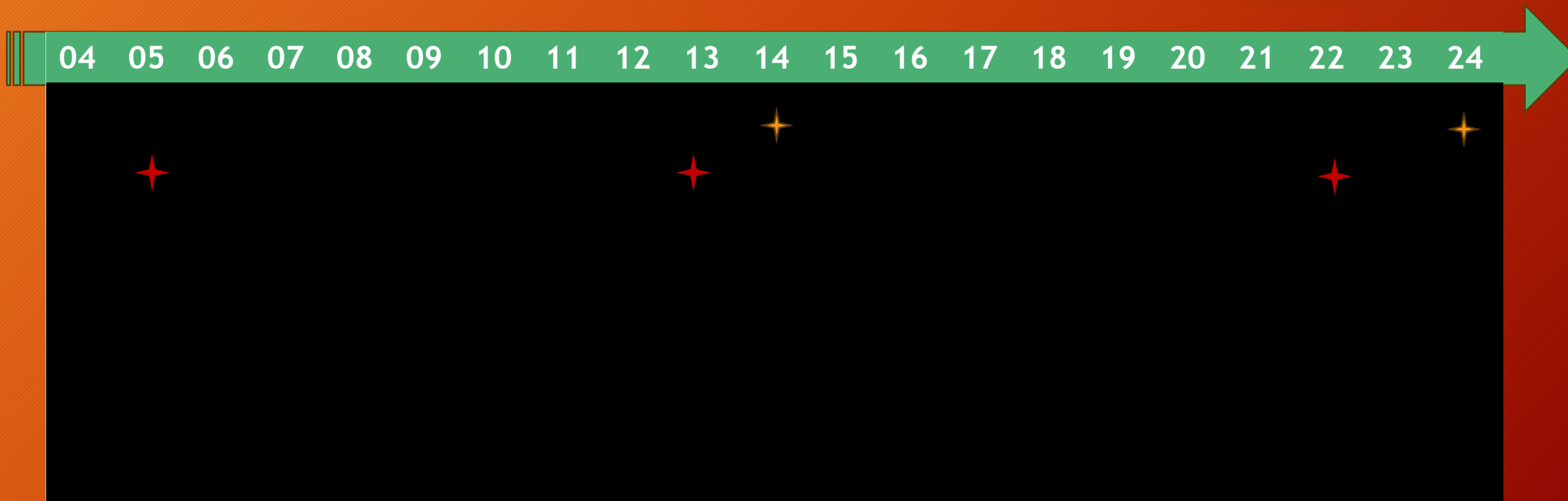
NIST Cybersecurity Framework (CSF)

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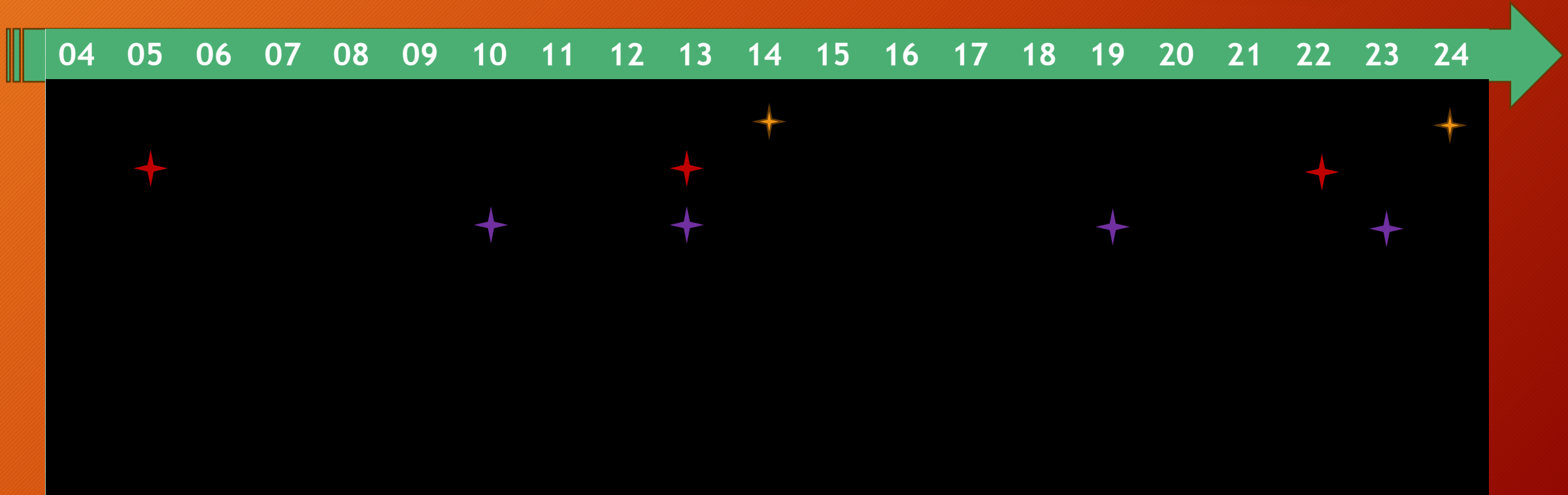
<https://www.nist.gov/cyberframework/history-and-creation-framework>

ISO/IEC 27001/27002



<https://www.nist.gov/cyberframework/history-and-creation-framework>

Cloud Security Alliance CCM (Cloud Controls Matrix)



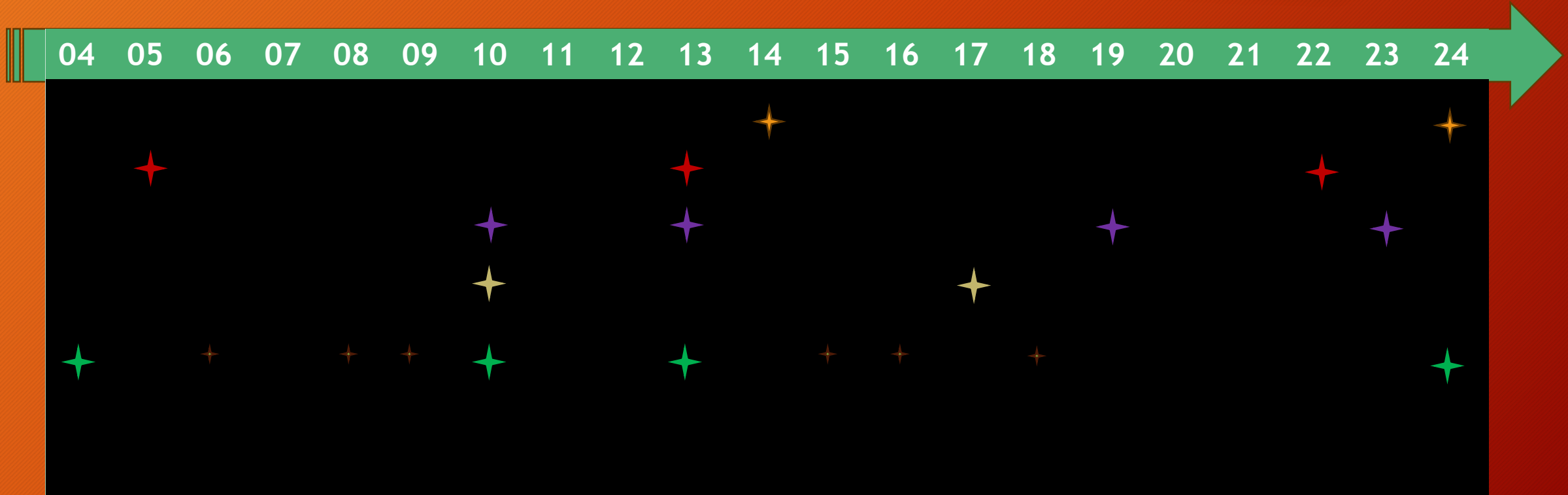
<https://cloudsecurityalliance.org/research/artifacts?page=3&term=cloud-controls-matrix>

AICPA SSAE 18 SOC 2 Type II



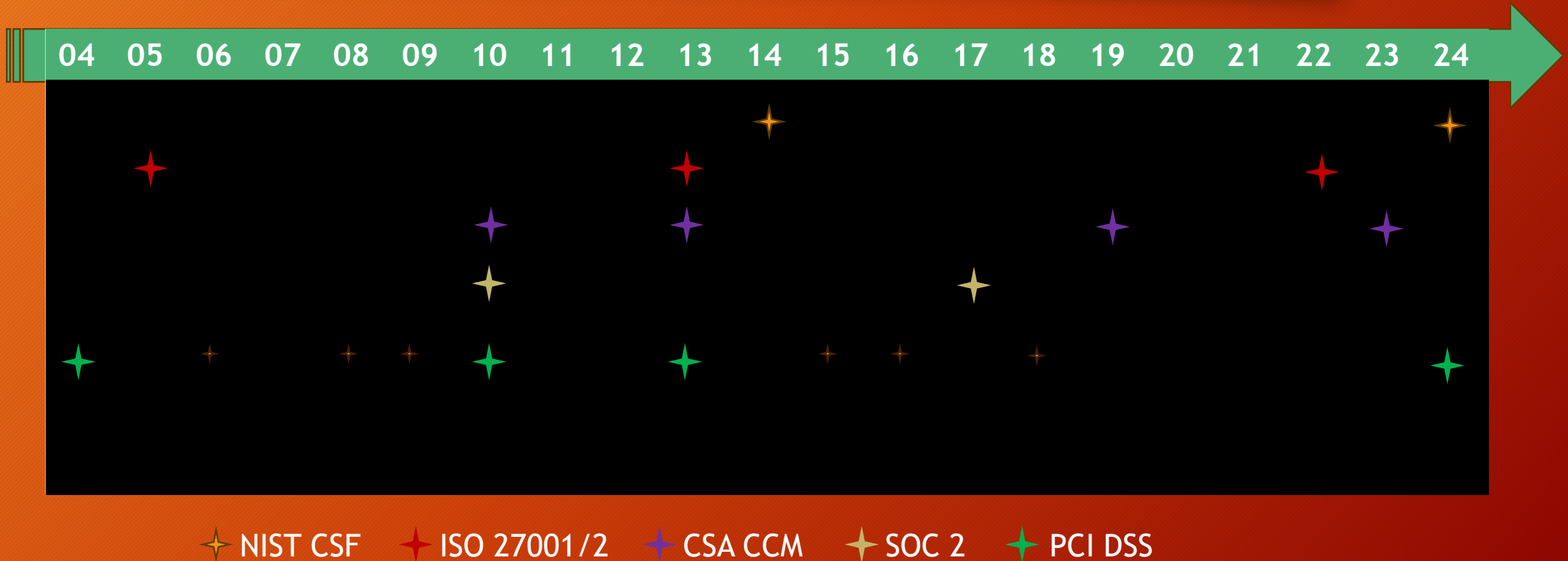
<https://secureframe.com/hub/soc-2/history>

Payment Card Industry PCI DSS



https://en.wikipedia.org/wiki/Payment_Card_Industry_Data_Security_Standard

Framework Modification Timeline



★ NIST CSF

★ ISO 27001/2

★ CSA CCM

★ SOC 2

★ PCI DSS

Have our investments in GRC made us safer?

The compliance frameworks are not licensed to drive



A culture of focusing on control intent moves us closer.

Frameworks are not updated at the same pace as technology advancements

Look beyond the narrow view of just the words that make up the control

Dig deep into the control intent and how it applies to your environments

Pragmatic Compliance Makes Us Safer

- ✓ Embrace a culture of communication
- ✓ Use risk-based decision-making
- ✓ Focus on control intent

Thank you