



# GLOBAL MARINE INSURANCE AGENCY<sup>SM</sup>

Division of Specialty Program Group, LLC

## MARINE DEALER COMPLIANCE CHECKLIST

### Written Risk Assessment

The risk assessment must be written and must include specific criteria as spelled out in the regulation.

### Appointment of a Qualified Individual

The Final Rule requires marine dealers to designate “a qualified individual responsible for overseeing and implementing your information security program and enforcing your information security program.” The qualified individual does not need to be a Chief Information Security Officer.

### Access Controls

Dealers must place access controls on information systems, including controls to authenticate and permit access only to authorized individuals to protect against the unauthorized acquisition of customer information and to review such access controls periodically

### Data and Systems Inventory

Dealers must “identify and manage the data, personnel, devices, systems, and facilities that enable [the dealer] to achieve business purposes in accordance with their relative importance to risk objectives and [the dealer’s] risk strategy.

### Data Encryption

The Final Rule requires dealers to “encrypt all customer information, both in transit over external networks and at rest.”



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### System Development Practices and Assess Externally Developed Applications

Dealers must adopt secure practices for in-house transmitting, assessing, or storing customer information and require dealers to develop procedures for evaluating, assessing or testing the security of external applications dealers utilize to transmit access or store customer information.”

### Multi-Factor Authentication (MFA or 2FA)

Dealers and service providers that house or access dealership data or systems must “implement multi-factor authentication for any individual accessing any information system unless your “Qualified Individual” has approved in writing the use of reasonably equivalent or more secure access controls.”

### Data Disposal / Destruction Procedures

Except for certain exceptions, Dealers must develop, implement, and maintain procedures for securely disposing customer information, however stored. The information must be disposed of “no later than two years after the last date the information is used in connection with the provision of a product or service to the customer to which it relates unless such information is necessary for business operations or other legitimate business purposes, is otherwise required to be retained by law or regulation, or where targeted disposal is not reasonably feasible due to how the information is maintained

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