





ChoicePoint















Allstate.







Data Security Breaches























United States Department of the Treasury

Internal Revenue Service



KAISER PERMANENTE











Top 10 US Customer Data Loss Incidents

Company / Organization	Number of affected customers	Date of initial disclosure
CardSystems	40 million	June 17
Citigroup	3.9 million	June 6
DSW Shoe Warehouse	1.4 million	March 8
Bank of America	1.2 million	February 25
Time Warner	600,000	May 2
LexisNexis	310,000	March 9
Ameritrade	200,000	April 19
Polo Ralph Lauren	180,000	April 14
ChoicePoint	145,000	February 15
Boston College	120,000	March 17
Source: InformationWeek; public disclosures by companies		

Incidents Reported between 02/05 and 08/06

256 Data Breaches 90,722,452 Customers Impacted



Surveys Conducted (Ponemon Institute)



23 million U.S. adults

"We regret to inform you that your data was compromised or lost"

- > 20% terminated their accounts
- Another 40% are thinking about it.



\$6.3 million average per-incident cost



40 % blamed on outsourcers, contractors, consultants, business partners



Surveys Conducted (Ponemon Institute)

Per incident...

- \$5 million (direct costs)
- •legal services
- notification letters
- •telecommunications costs
- product discounts
- increased staffing

- **\$7.5** million (opportunity costs)
 - •customer loss
 - increased difficulty recruiting new customers
 - + \$1.3 million (indirect costs)
 - Lost employee productivity



\$4.1 million lost business per incident in 2007 On average \$140 (per lost record)

From "Lost Customer Information: What Does a Data Breach Cost Companies?"



Penalties are Significant



If you use a credit card or have applied for credit, your personal information is in the ChoicePoint system!

- "The Federal Trade Commission hit data broker ChoicePoint Inc. with the <u>largest civil penalty</u> in the agency's history for allowing sensitive customer information to get into the hands of con artists.
- The commission levied a \$10-million penalty on top of \$5 million in restitution a total that amounts to more than 10% of the company's 2005 profit."

Los Angeles Times, January 27, 2006 – ChoicePoint is Fined for Data Breach



The world is watching!

- "Privacy Rights Clearinghouse"
 - 236,808,763 records containing sensitive personal information involved in breaches since January 2005
 - 233 incidents in 2008 (as of 8/25/08)
 - http://www.privacyrights.org/ar/ChronDataBreaches.htm
- Risk of exposure can cause significant damage
 - Lawsuits, Reputation, Loss of Customers, etc.



Reaction

- Forced Internal data procedural audits
- Regulatory Compliance
 - Sarbanes-Oxley Act
 - PCI
 - United States Gramm-Leach-Bliley Act
 - Health Insurance Portability and Accountability Act (HIPAA)
 - Australia Privacy Amendment Act of 2000
 - European Union Personal Data Protection Directive
 - Hong Kong Personal Data (Privacy) Ordinance of 1995
 - New Zealand Privacy Act of 1993
 - ETC ...
- Over 50% of companies now have a Data Privacy Officer



Most Common Data Security Loss



Ponemon Institute
"Data Security Tracking Study"

"Gartner research found that <u>70</u> percent of security incidents incurring actual losses are <u>inside jobs</u>.

This speaks to a growing industry-wide understanding that <u>outside hackers are no longer the main threat to data security.</u>

LabRat Magazine, May 2005
"Preventing Confidential Internal Data Leaks"



The Quality Conundrum

 Resources, risk and deadlines are often in conflict

How long do I have?





Time

Cost

Resource

Risk



Secure Approaches

Don't test, just put it in production.

Test lightly, carefully in production.

Encrypt data at the source.

Challenging to implement, support and test

Secure but dangerous!

Let's be serious please.

What does that say?

- Create a test/staging environment with copies of production data
 - Locked down, clean-room approach
 - Extremely limiting and inefficient for testing efforts
 - Does not address need to expose systems externally
- Create a test/staging environment with <u>de-identified test data</u>
 - Best option for obscuring personal information
 - Addresses need to expose systems externally



Why is test data hard to secure?

Access beyond normal application interfaces is needed for testing and support purposes

- Need to look "under the covers"
- Need to directly manipulate test data
- Need to share data with developers or application vendor





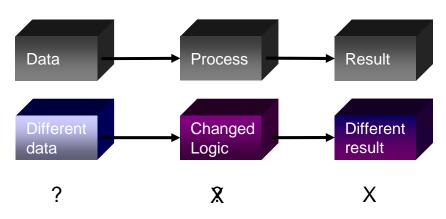
Test Data Strategy

Address data privacy concerns

De-Identify your test data

Remove the data variable from regression testing:

- Known starting point(s) for test data
- Protect test data for easy reuse
- Manage test data as part of the test pack





Test Data

Often the bane of good, secure regression testing

How

- ... much time is spent creating/maintaining it?
- ... often is bad data the core cause of testing issues?
- ... is the data reset to known states?
- ... does delays in refreshing impact cycle time of tests?
- ... is data management tied to testing automation?
- ... is it secured, scrambled?

Who

- ... creates/manages/shares the data?
- ... has access? QA? Dev? DBA's?
 - Full data detail in all its glory?
 - Common source of breaches

How long do I have?
How much do I test?
How much risk am I willing to take?



How to get my Test Data





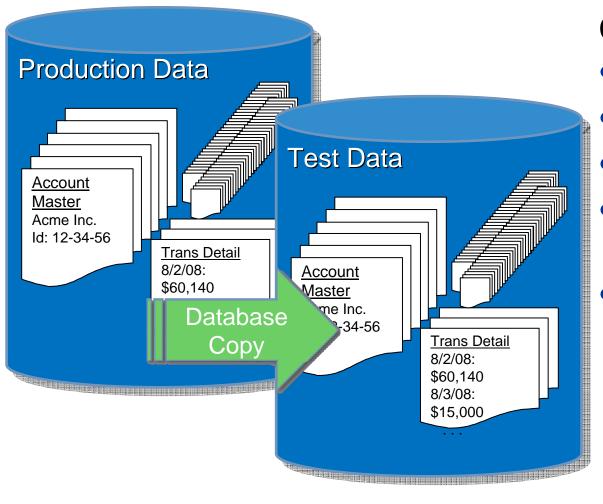
Test in Production

 To heck with Test Data and Test Environments, just put it in production and hope for the best.





Copy Production Data



Can be ...

- Too much
- No data privacy
- Difficult to "reset"
- Can hinder test coverage
- Most common

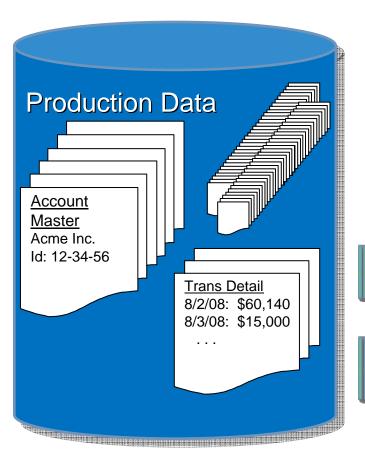


Generate Test Data

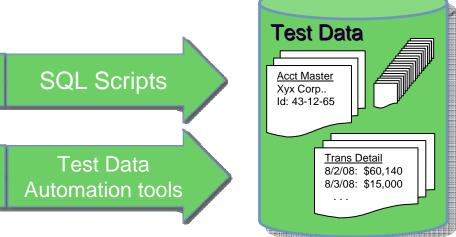
Can be ... Incomplete Not real world Difficult to "reset" Not enough **Test Data Account** Master Acme Inc. 2-34-56. Ad hoc, manual Trans Detail 8/2/08: \$60,140 8/3/08: \$15,000 **Automated Testers Testers**



Extract from Production



- Build and maintain SQL scripts
- Use test data automation tools
- Reuse extraction criteria against changed production data
- Apply scrambling to de-identify



Smaller, more manageable data environment



Extraction from Production

If Production data available, the best option

Smaller, more manageable

- Multiple copies QA, Dev, Support
- Retain versions, save with releases

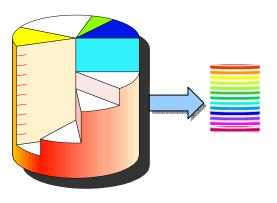
Extract variations

- Can be re-extracted to include new data
- Different extractions to support different tests

Seed your test data

- Max records, fraction or percentage of file
- Sample important field combinations

Leverage for extract process for customer environments May require scrambling to secure privacy





Data Warping & Scrambling

- Warp Date/Time in test data
 - Simulate key processing dates
 - End of month
 - End of year
 - Extend value of test data
- Scramble / De-identify sensitive data
 - Vertical and logical scrambling
 - Masking
 - Selective generation
- Maintain referential integrity
 - Ensure scrambling and warping are applied consistently



b1	t2	g3
p1	g2	b3
t1	b2	рЗ
g1	p2	t3

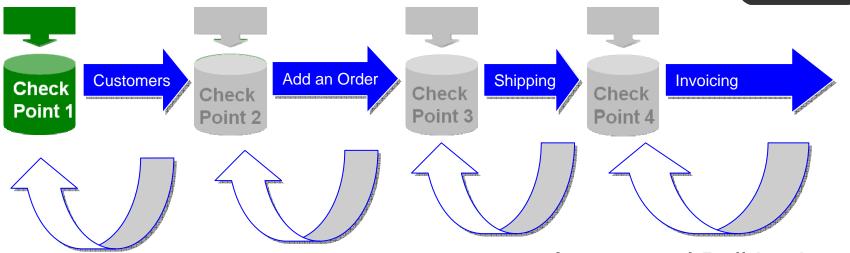


Protect Good Test Data

- Maintain pristine copy of data via checkpoints & rollbacks
 - Reduce need for new copies
 - Repeatability of tests using the exact same data
 - Reset to checkpoints within automated scripts

Incremental Check Points

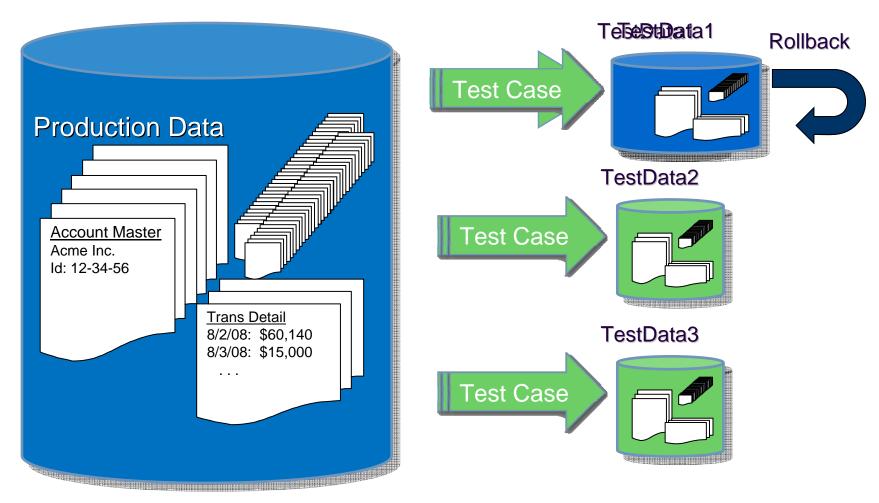




Incremental Roll-back



Testing Environment Management





Importance of Test Data

- Test data is invaluable if it
 - Is <u>available</u> not <u>inaccessible</u> expedite the process of testing
 - Is <u>representative</u> not <u>repetitive</u> reduce the scope of testing
 - Is manageable not large disk space can be a scarce
 - Is malleable not rigid adjust dates to test past or future
 - Is <u>easily refreshed</u> not <u>reliant on DBA's</u> be master of own timeline
- Securing test data is critical so that it
 - Has <u>integrity</u> not <u>inconsistent</u> don't introduce defects
 - Is <u>de-identified</u> not <u>recognizable</u> open testing to more people
 - Is valid not real share test scenarios



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- Database Transaction Visibility





