

Red Flag Report

December 14, 2023

What is the Red Flag Report

 Fair and Accurate Credit Transactions Act of 2003 (FACTA) required reasonable procedures to identify "Red Flags" defined by the Federal Trade Commission as "a pattern, practice, or specific activity that indicates the possible existence of identity theft."

* <u>NEW BRA</u>



NBU implemented the Identity Theft Prevention Program to manage the following activities for "Red Flag" identification: Identify relevant Red Flags for new and existing covered accounts and incorporate those Red Flags into the program; Incorporate Red Flags already identified in existing NBU Policy into the program; Describe and establish appropriate responses to any Red Flags as detected to prevent and mitigate identity theft; and Update the Program periodically to assess changes in customer risk incidents, methods of risk identification or classification, supervisory oversight requirements, and training needs.

BU NEW BRAUNFELS

2

3

4

NBU implemented the Identity Theft Prevention Program to manage the following activities for "Red Flag" identification:

Identify relevant Red Flags for new and existing covered accounts and incorporate those Red Flags into the program;

Incorporate Red Flags already identified in existing NBU Policy into the program;

Describe and establish appropriate responses to any Red Flags as detected to prevent and mitigate identity theft; and

Update the Program periodically to assess changes in customer risk incidents, methods of risk identification or classification, supervisory oversight requirements, and training needs.

BU[®] NEW BRAUNFELS

NBU implemented the Identity Theft Prevention Program to manage the following activities for "Red Flag" identification:

Identify relevant Red Flags for new and existing covered accounts and incorporate those Red Flags into the program;

Incorporate Red Flags already identified in existing NBU Policy into the program;

Describe and establish appropriate responses to any Red Flags as detected to prevent and mitigate identity theft; and

Update the Program periodically to assess changes in customer risk incidents, methods of risk identification or classification, supervisory oversight requirements, and training needs.

BU[®] NEW BRAUNFELS

NBU implemented the Identity Theft Prevention Program to manage the following activities for "Red Flag" identification:

Identify relevant Red Flags for new and existing covered accounts and incorporate those Red Flags into the program;

Incorporate Red Flags already identified in existing NBU Policy into the program;

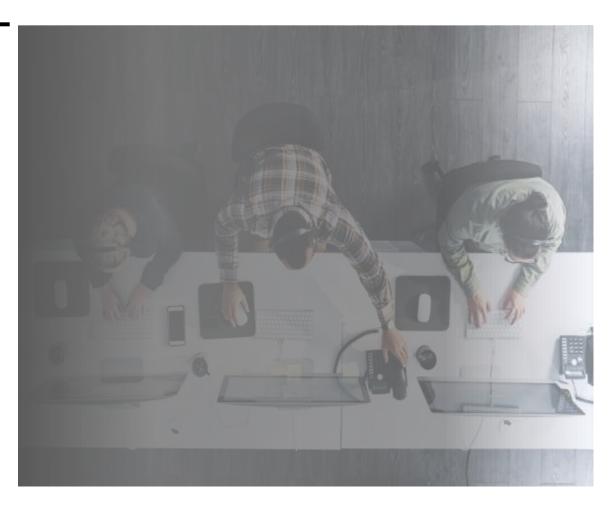
Describe and establish appropriate responses to any Red Flags as detected to prevent and mitigate identity theft; and

Update the Program periodically to assess changes in customer risk incidents, methods of risk identification or classification, supervisory oversight requirements, and training needs.

Incidents

NEW BR

- Event Date: January 3, 2023
- **Department:** Customer Service
- Event Type: Stolen Laptop
- <u>Event Resolution</u>: Notification to the New Braunfels Police Department and a case files was created



Endpoint Management Platform

Implementation of a modern platform to monitor and identify vulnerabilities for remediation.

Program Evaluations

Completion of two (2) program evaluations that will define a maturity path in the form of a multi-year roadmap.

Awareness Training

Successful completion of the mandatory annual cybersecurity awareness training with 100% employee and Board of Trustee participation.

Vulnerability Remediation

Redesign of vulnerability assessment and remediation program incorporating multiple technology teams using criteria to determine resolution factoring risk tolerance.

Endpoint Management Platform

Implementation of a modern platform to monitor and identify vulnerabilities for remediation.

Program Evaluations

Completion of two (2) program evaluations that will define a maturity path in the form of a multi-year roadmap.

Awareness Training

Successful completion of the mandatory annual cybersecurity awareness training with 100% employee and Board of Trustee participation.

Vulnerability Remediation

Redesign of vulnerability assessment and remediation program incorporating multiple technology teams using criteria to determine resolution factoring risk tolerance.

Endpoint Management Platform

Implementation of a modern platform to monitor and identify vulnerabilities for remediation.

Program Evaluations

Completion of two (2) program evaluations that will define a maturity path in the form of a multi-year roadmap. Successful completion of the mandatory annual cyber- security awareness training with 100% employee and Board of Trustee participation.

Awareness

Training

Vulnerability Remediation

Redesign of vulnerability assessment and remediation program incorporating multiple technology teams using criteria to determine resolution factoring risk tolerance.

Endpoint Management Platform

Implementation of a modern platform to monitor and identify vulnerabilities for remediation.

BU NEW BRAUNFELS

Program Evaluations

Completion of two (2) program evaluations that will define a maturity path in the form of a multi-year roadmap.

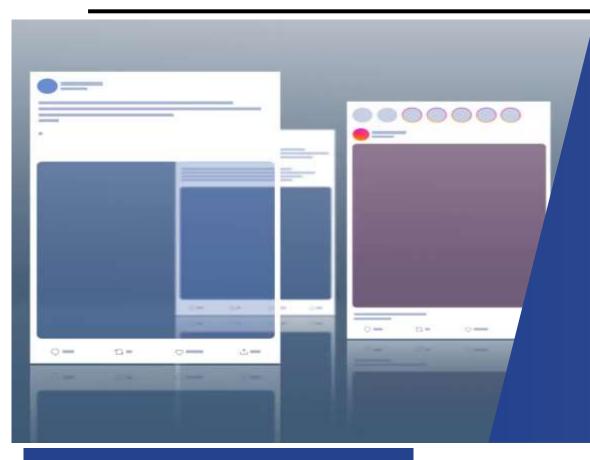
Awareness Training

Successful completion of the mandatory annual cybersecurity awareness training with 100% employee and Board of Trustee participation.

Vulnerability Remediation

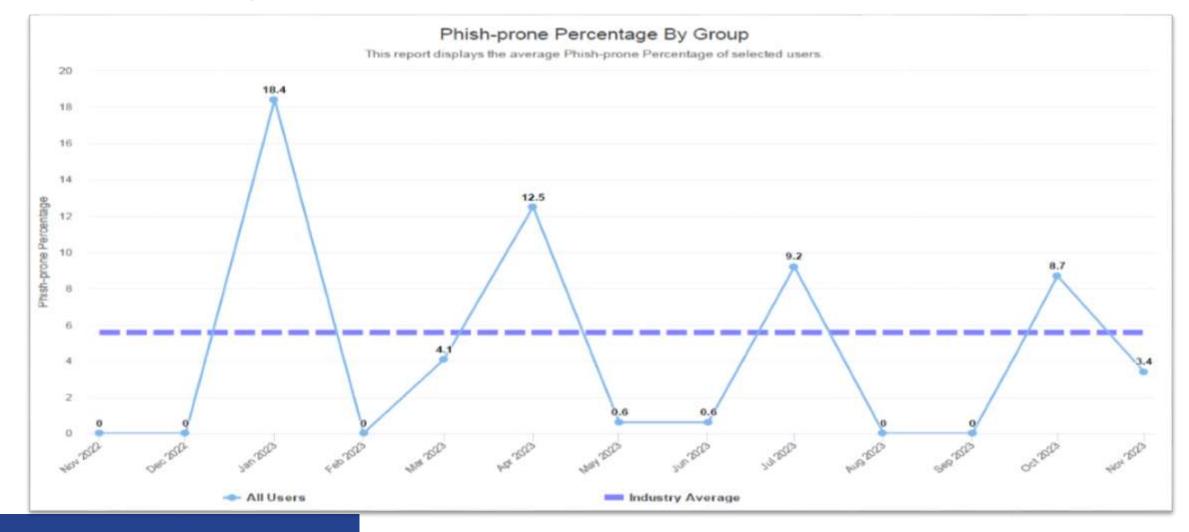
Redesign of vulnerability assessment and remediation program incorporating multiple technology teams using criteria to determine resolution factoring risk tolerance.

Phishing Simulations

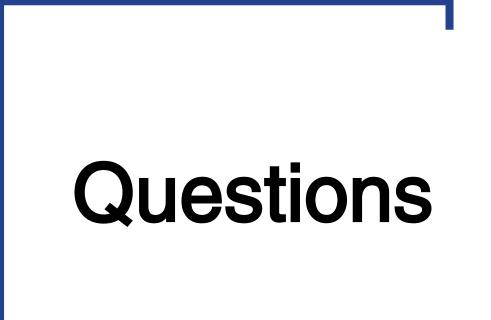


- Phishing campaign vs phishing simulation
- Monthly cadence of simulated attacks
- NBU Click Rate is 4.75% compared to national utility average of 5.6%
- Decrease of 6% compared to 2021

Phishing Simulations



BU UTILITIES







Red Flag Report

December 14, 2023