

Outline



Motivation

- References between Regulatory Documents and Company Policies
- Industry Partner Alyne GmbH
- Problem Statement
- **Proposed Solution**

Research Approach

- **Iterative Approach**
- Research Questions

Implementation

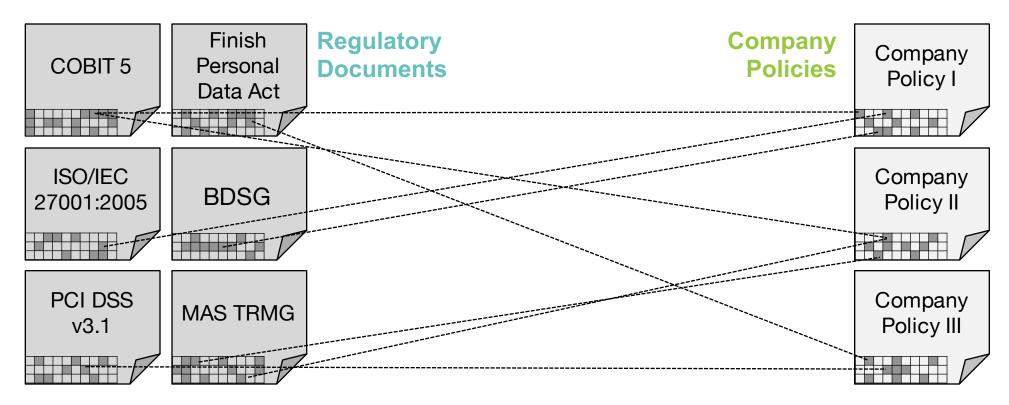
- Recommender System
- Management & Analysis GUI

Evaluations & Results

References between Company Policies and Regulatory Documents



Deriving company policies from regulatory documents is a legal requirement for companies → Implicit reference

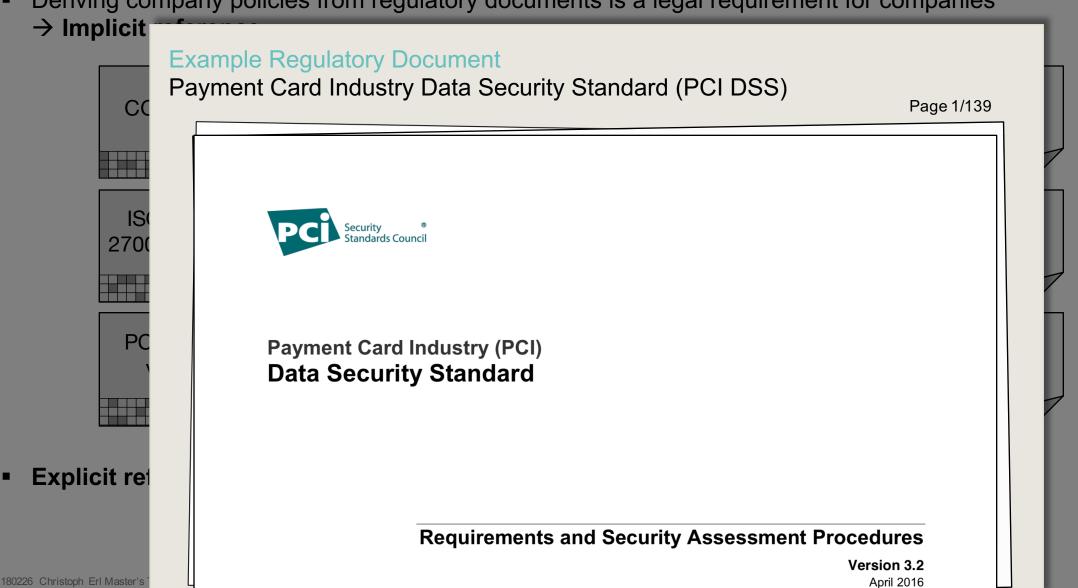


Explicit references are required for future audits or updates

References between Company Policies and Regulatory Documents



Deriving company policies from regulatory documents is a legal requirement for companies



References between Company Policies and Regulatory Documents



Deriving company policies from regulatory documents is a legal requirement for companies

→ Implicit

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Example Regulatory Document: PCI DSS

Payment Card Industry Data Security Standard

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new ones and modifying or deleting existing ones.



Requirement 8: Identify and authenticate access to system components

documented approval

Assigning a unique identification (ID) to each person with access ensures that each individual is uniquely accountable for their actions. When such accountability is in place, actions taken on critical data and systems are performed by, and can be traced to, known and authorized users and processes.

The effectiveness of a password is largely determined by the design and implementation of the authentication system—particularly, how frequently password attempts can be made by an attacker, and the security methods to protect user passwords at the point of entry, during transmission, and while in storage.

Note: These requirements are applicable for all accounts, including point-of-sale accounts, with administrative capabilities and all accounts used to view or access cardholder data or to access systems with cardholder data. This includes accounts used by vendors and other third parties (for example, for support or maintenance). These requirements do not apply to accounts used by consumers (e.g., cardholders).

However, Requirements 8.1.1, 8.2, 8.5, 8.2.3 through 8.2.5, and 8.1.6 through 8.1.8 are not intended to apply to user accounts within a point-of-sale payment application that only have access to one card number at a time in order to facilitate a single transaction (such as cashier accounts).

PCI DSS Requirements	Testing Procedures	Guidance
8.1 Define and implement policies and procedures to ensure proper user identification management for nonconsumer users and administrators on all system components as follows: 8.1.1 Assign all users a unique ID before allowing them to access system components or cardholder data.	8.1.a Review procedures and confirm they define processes for each of the items below at 8.1.1 through 8.1.8	By ensuring each user is uniquely identified—instead of using one ID for several employees—an organization can maintain individual responsibility for actions and an effective audit trail per employee. This will help speed issue resolution and containment when misuse or malicious intent occurs.
	8.1.b Verify that procedures are implemented for user identification management, by performing the following:	
	8.1.1 Interview administrative personnel to confirm that all users are assigned a unique ID for access to system components or cardholder data.	
8.1.2 Control addition, deletion, and modification of user IDs, credentials, and other identifier objects.	8.1.2 For a sample of privileged user IDs and general user IDs, examine associated authorizations and observe system settings to verify each user ID and privileged user ID has been implemented with only the privileges specified on the	To ensure that user accounts granted access to systems are all valid and recognized users, strong processes must manage all changes to user IDs an other authentication credentials, including adding the control of the

Explicit ref

References between Company Policies and Regulatory Documents



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Example Regulatory Document: PCI DSS

Payment Card Industry Data Security Standard

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PCI DSS Requirements	Testing Procedures	Guidance
8.2.5 Do not allow an individual to submit a new password/passphrase that is the same as any of the last four passwords/passphrases he or she has used.	8.2.5.a For a sample of system components, obtain and inspect system configuration settings to verify that password parameters are set to require that new passwords/passphrases cannot be the same as the four previously used passwords/passphrases.	If password history isn't maintained, the effectiveness of changing passwords is reduced, a previous passwords can be reused over and over. Requiring that passwords cannot be reused for a period of time reduces the likelihood that passwords
	8.2.5.b Additional testing procedure for service provider assessments only: Review internal processes and	that have been guessed or brute-forced will be used in the future.
	customer/user documentation to verify that new non-consumer customer user passwords/passphrase cannot be the same as the previous four passwords.	Note: Testing Procedure 8.2.5.b is an additional procedure that only applies if the entity being assessed is a service provider.
8.2.6 Set passwords/passphrases for first-time use and upon reset to a unique value for each user, and change immediately after the first use.	8.2.6 Examine password procedures and observe security personnel to verify that first-time passwords/passphrases for new users, and reset passwords/passphrases for existing users, are set to a unique value for each user and changed after first use.	If the same password is used for every new user, ar internal user, former employee, or malicious individual may know or easily discover this password, and use it to gain access to accounts.
8.3 Secure all individual non-console administrative access and all remote access to the CDE using multi-factor authentication.		Multi-factor authentication requires an individual to present a minimum of two separate forms of authentication (as described in Requirement 8.2), before access is granted.
Note: Multi-factor authentication requires that a minimum of two of the three authentication methods (see Requirement 8.2 for descriptions of authentication methods) be used for authentication. Using one factor twice (for example, using two separate		Multi-factor authentication provides additional assurance that the individual attempting to gain access is who they claim to be. With multi-factor authentication, an attacker would need to compromise at least two different authentication mechanisms, increasing the difficulty of compromise and thus reducing the risk.
passwords) is not considered multi-factor authentication.		Multi-factor authentication is not required at both the system-level and application-level for a particular system component. Multi-factor authentication can

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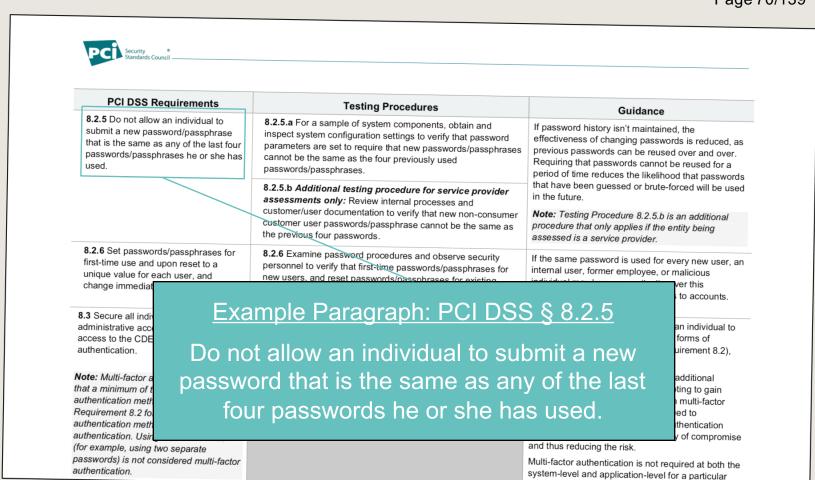
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Example Regulatory Document: PCI DSS

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system component Multi-factor authentication cor

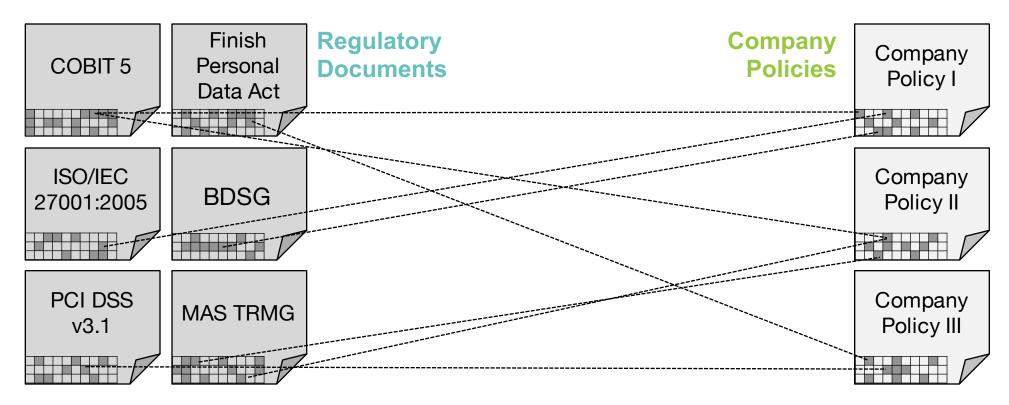


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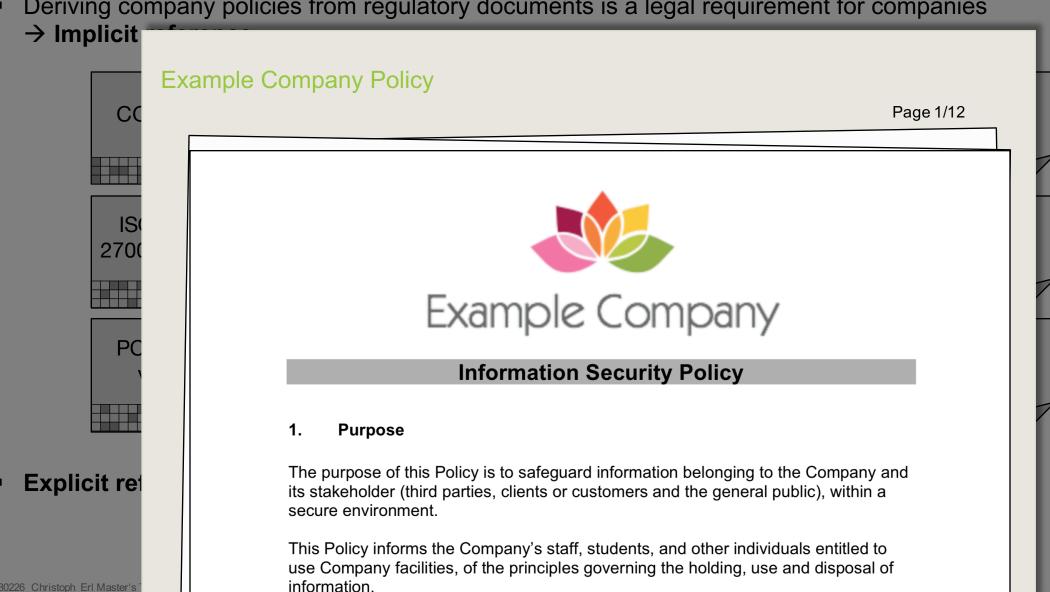


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References between Company Policies and Regulatory Documents



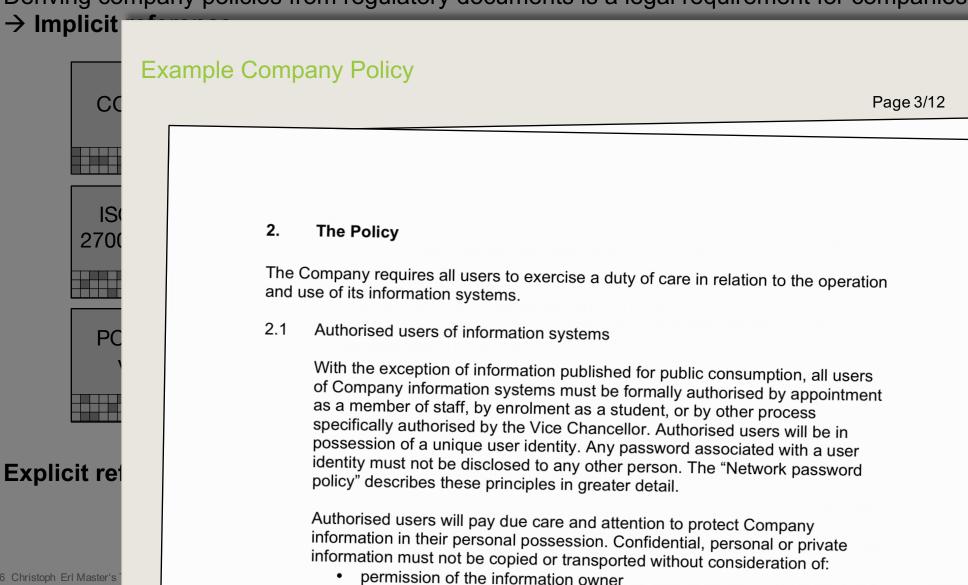
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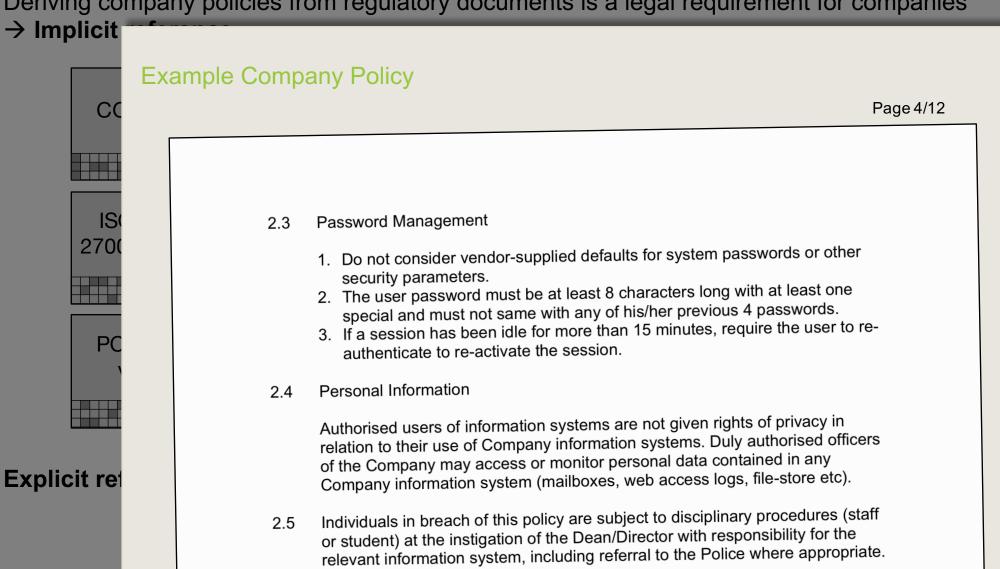
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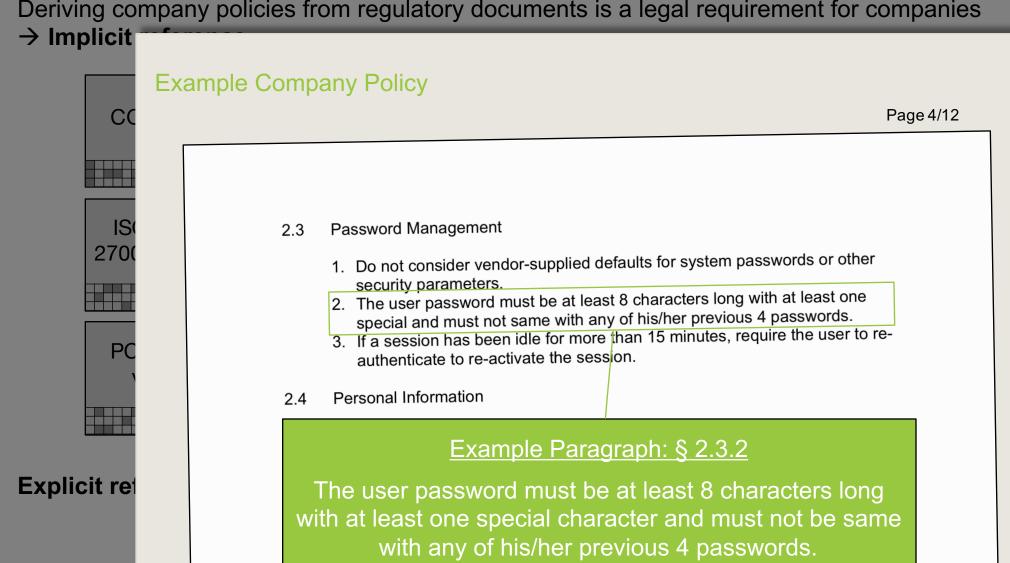


The Company will take legal action to ensure that its information systems are

References between Company Policies and Regulatory Documents



Deriving company policies from regulatory documents is a legal requirement for companies

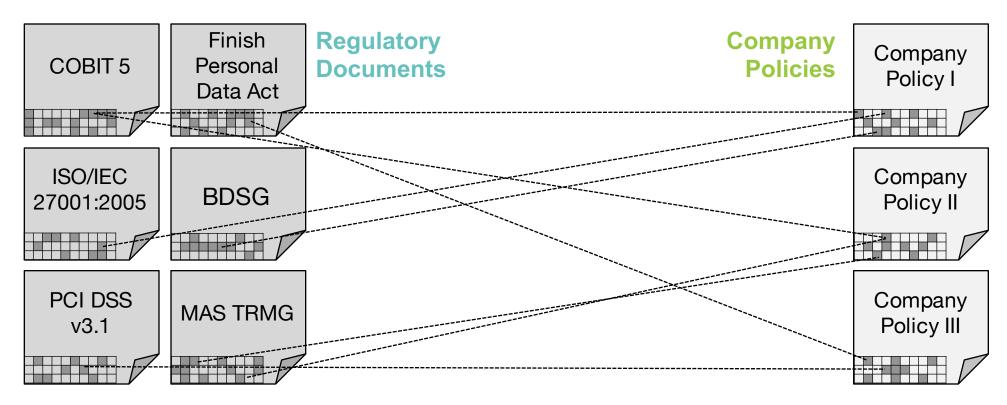


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References between Company Policies and Regulatory Documents



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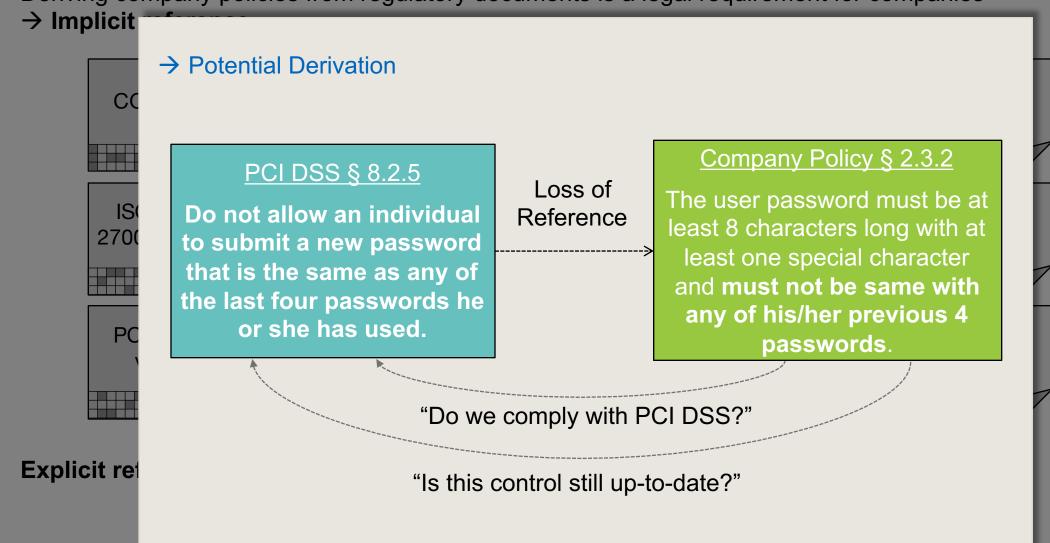


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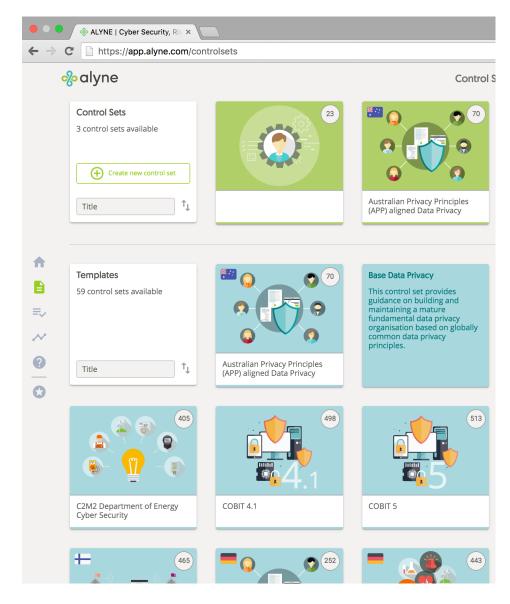
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Motivation Industry Partner Alyne GmbH



- RegTech Company
 - Launch in 2015
 - Software-as-a-Service (SAAS)
 - B2B

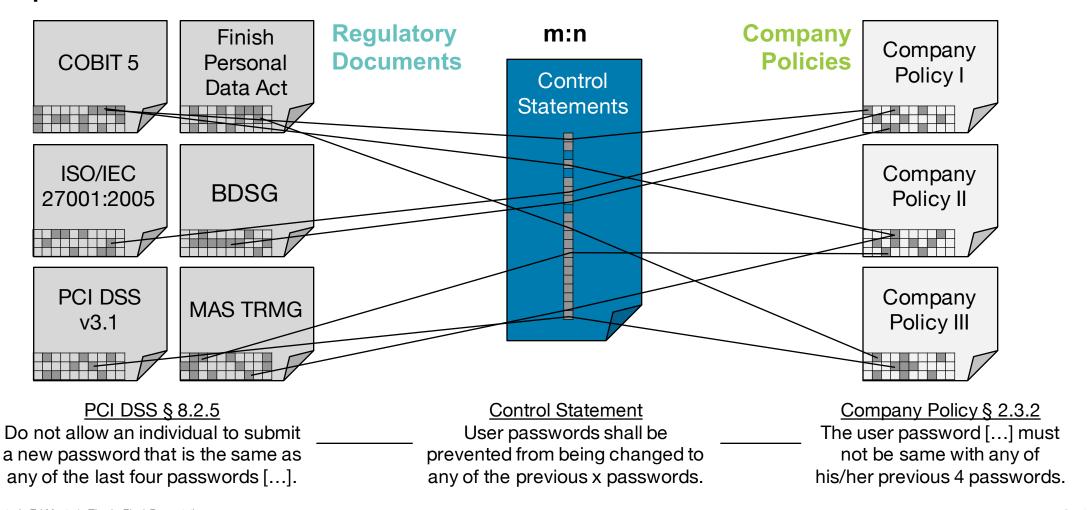
- Business Idea
 - Alyne delivers a software that supports organisations to manage their cyber security, risk management and compliance.
 - Generalized control statements serve as a glue between company policies and regulatory documents



Industry Partner Alyne GmbH – Control Statements



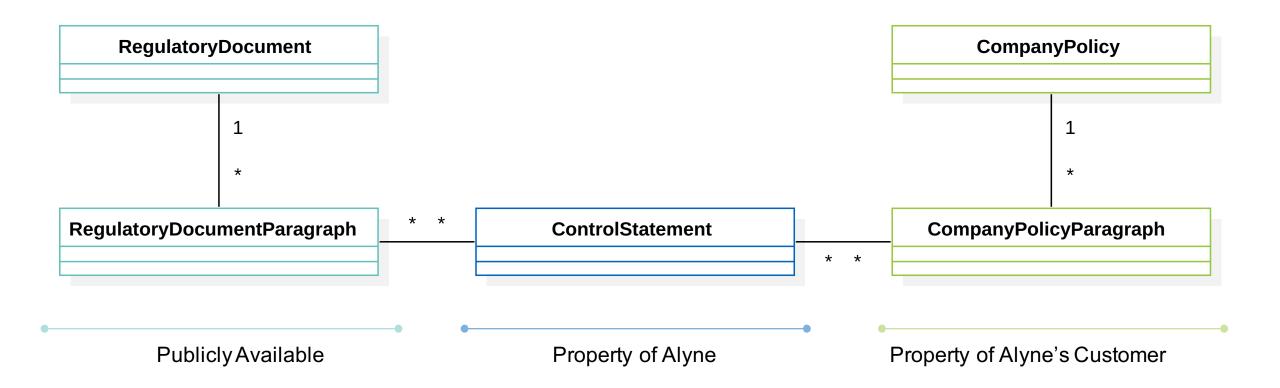
- Paragraphs from regulatory documents and company policies are linked by generalized, well defined control statements
 - → Explicit References



Motivation Industry Partner Alyne GmbH – Data Model



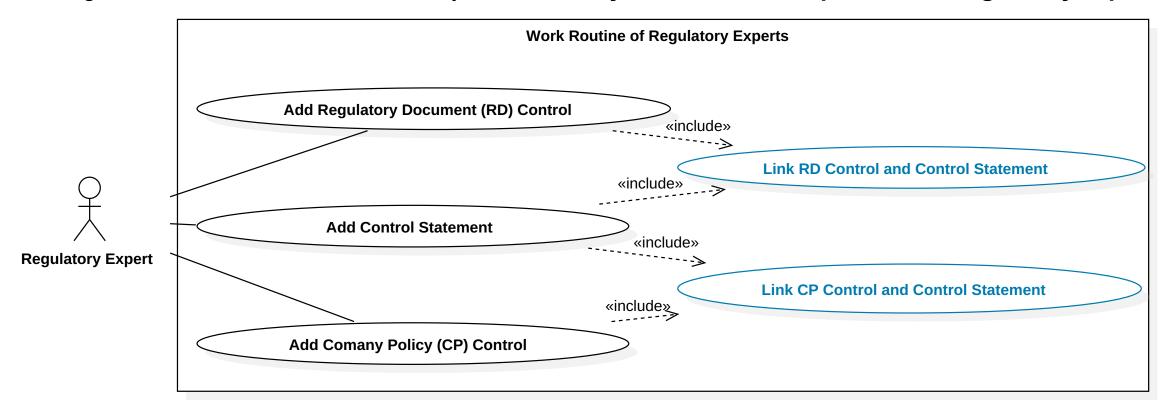
- Paragraphs from regulatory documents and company policies are linked by generalized, well defined control statements
 - → Explicit References



Motivation Problem Statement



Linking Controls to Control Statements by hand is a very labour intensive process for regulatory experts!



Problem Statement:

How can we support regulatory experts in their work routine, in particular, to link company policy controls and regulatory documents to control statements?

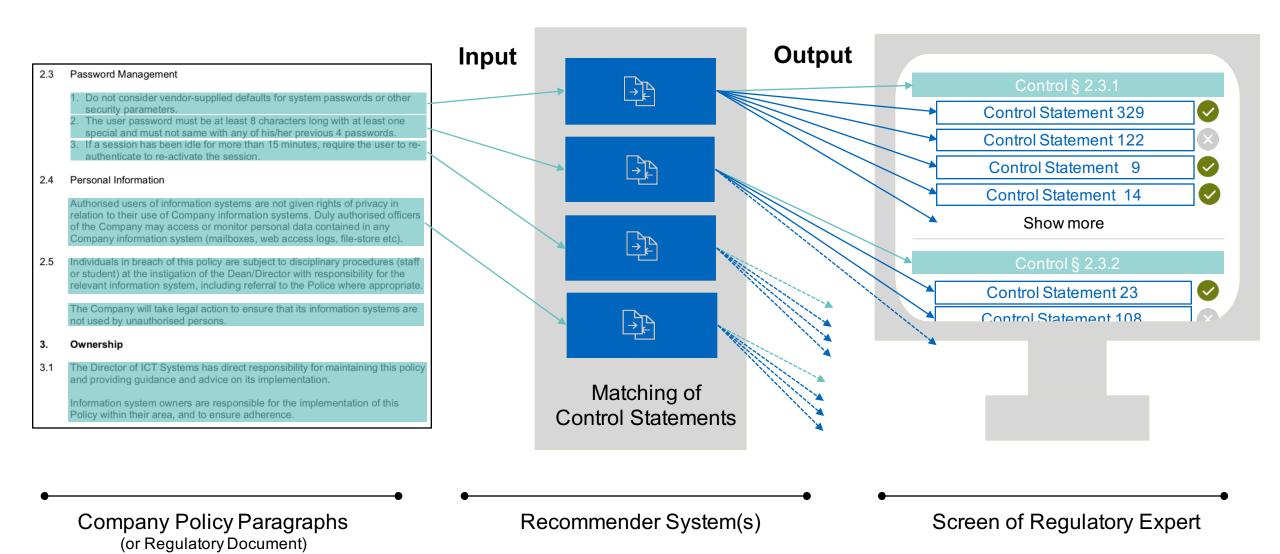


Proposed Solution:

- A recommender system suggests related control statements for a given input control using text similarity approaches.
- Whenever an expert intends to link a control, the system sorts the collection of 879 control statements according to their semantic similarities to the control whereby the more similar control statements appear at the top.

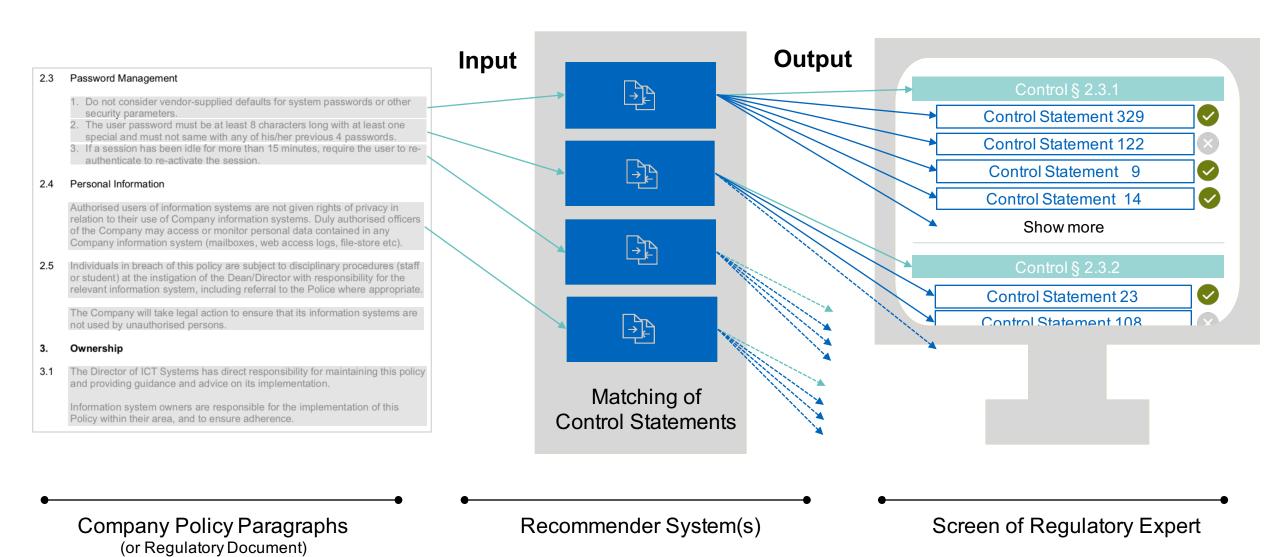
- The intended effect is that experts
 - do not need to check all control statements but only the top results (time savings) and
 - find control statements which they might have forgotten (improved data quality).





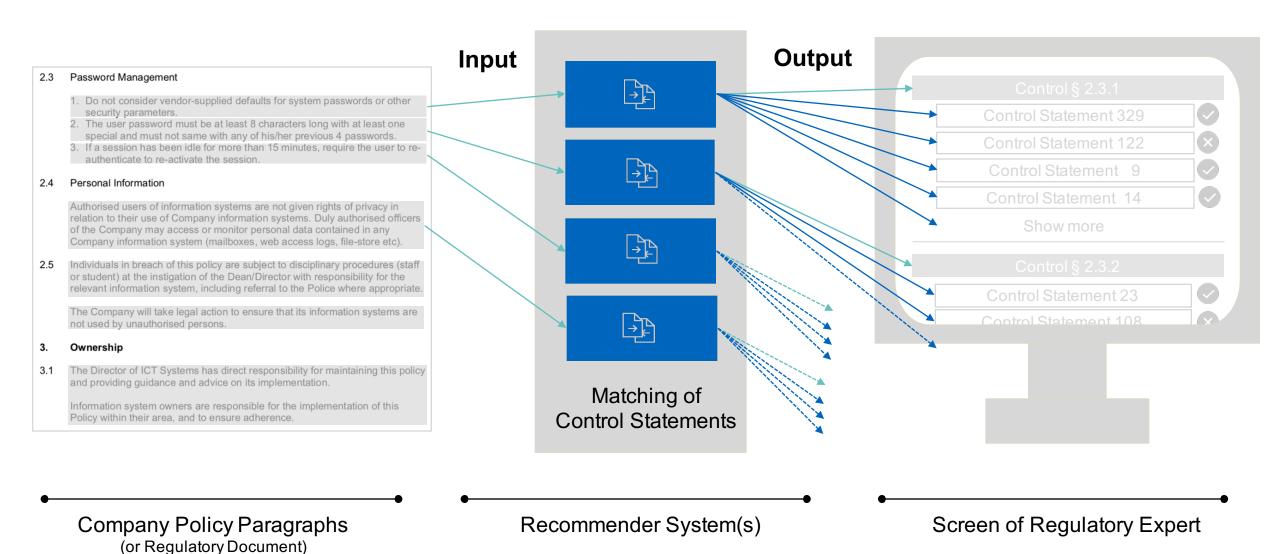
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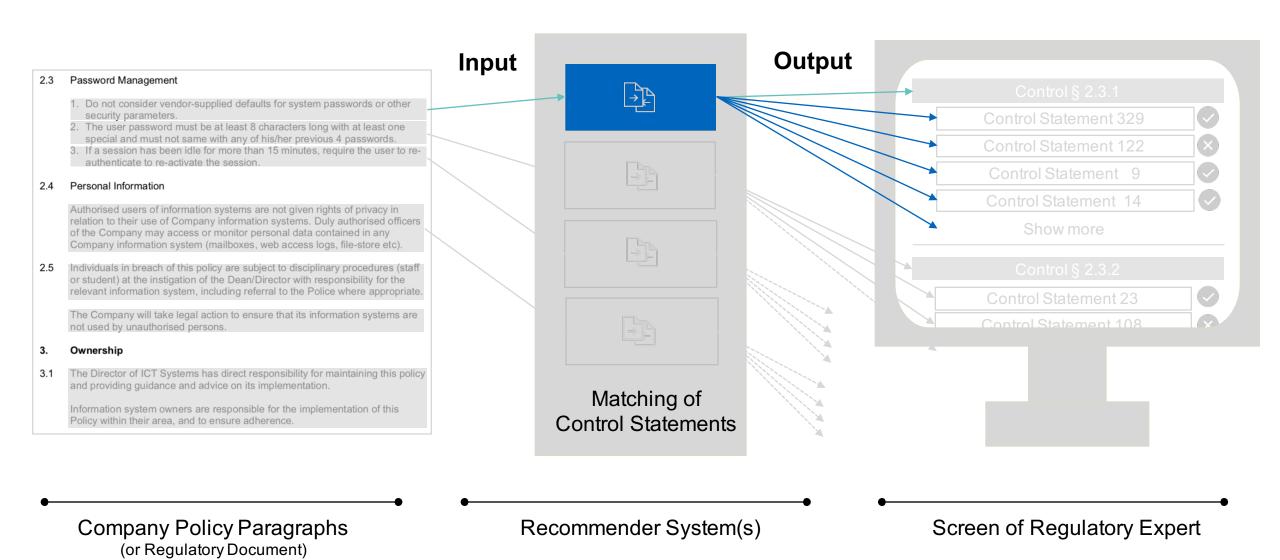
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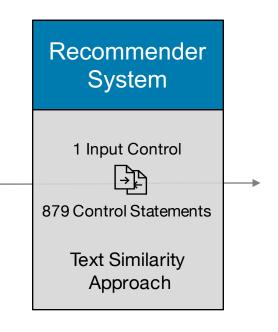




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Do not allow an individual to submit a new password that is the same as any of the last four passwords he/she has used.



User passwords shall be prevented from being changed to any of the previous 10 passwords.

Privileged account passwords shall be prevented from being changed to any of the previous 15 passwords.

879.Recovery from backup media shall be tested at least every year.

Output

Input



Do not allow an individual to submit a new password that is the same as any of the last four passwords he/she has used.

[0.1, 0.5, 0.2, ..., 0.9]

(accurately matching terms only)

(synonyms to some degree) |

Vector Representation

- TF-IDF or
- Word2Vec or
- Doc2Vec

Recommender

System

1 Input Control

879 Control Statements

Text Similarity

Approach

Similarity

Measure

Cosine

Similarity

1. User passwords shall be prevented from being changed to any of the previous 10 passwords.

[0.2, 0.6, 0.3, ..., 0.7]

→ Similarity: 95%

2. Privileged account passwords shall be prevented from being changed to any of the previous 15 passwords.

[0.4, 0.7, 0.2, ..., 0.8]

→ Similarity: 92%

:

- 879.Recovery from backup media shall be tested at least every year.

[0.8, 0.1, 0.4, ..., 0.2]

→ Similarity: 40%

Input

Output

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Implementation

- Recommender System
- Management & Analysis GUI

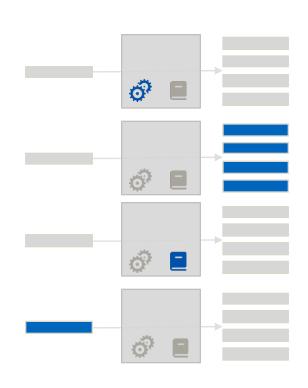
Evaluations & Results

Research Approach Research Questions



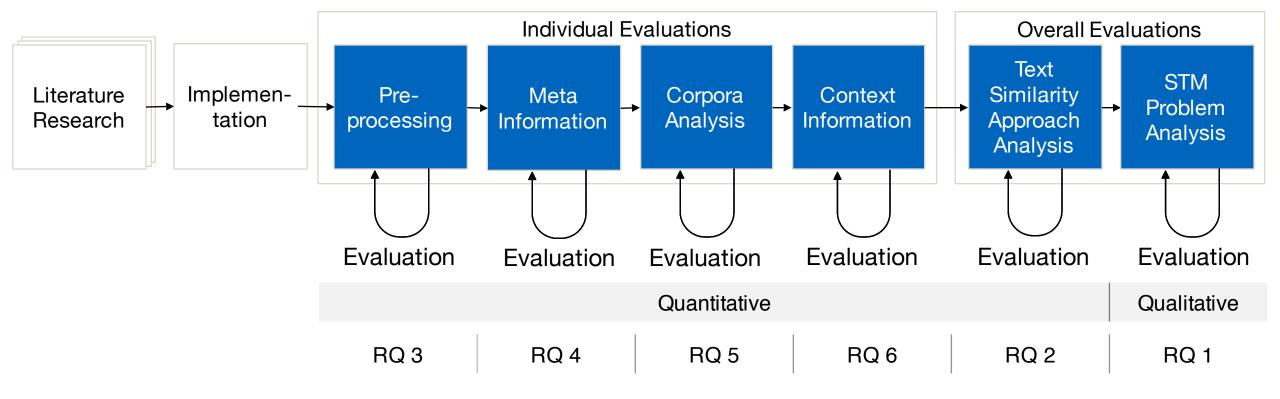
- To which degree does the text similarity approach solve the semantic text matching problem?
- What text similarity approach performs best TF-IDF, Word2Vec or Doc2Vec?

- Which preprocessing technologies have a positive impact on the matching results?
- Does the addition of meta information to control statements improve the results?
- What are good corpora to train Word2Vec and Doc2Vec?
- Can chapter or paragraph context help to improve the results?



Research Approach Iterative Approach





Quantitative Evaluation: Rank-Position-Score (RPS, average rank)

1000 ground truth items from 10 regulatory documents

Qualitative Evaluation: Feedback sheet

RP	Control Statement Id	
2	Control_Statement_Id_00033 Control_Statement_Id_00544 Control_Statement_Id_00056 Control_Statement_Id_00612 (and 875 more)	RPS = (1+3)/2 = 2

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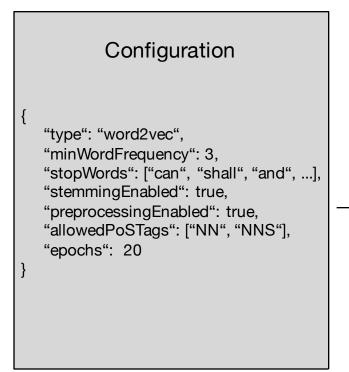
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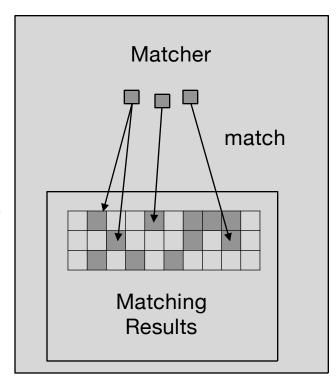
Implementation Recommender System



- Core functionality: Match a text passage against a collection of other text passages using text similarity approaches (TF-IDF, Word2Vec, Doc2Vec)
- Framework DeepLearning4Java (DL4J)







evaluate

```
Ground Truth

[{

    "identifier": "ISO 31000:2009 4.3.5",
    "input": "The organization should
    allocate appropriate resources for
    risk management: ...",
    "output": [
        "The Chief Risk Officer shall be
        responsible for the appropriate
        management of risks ...",
        "..."

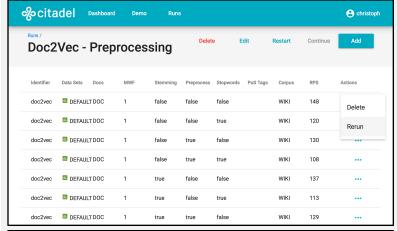
]

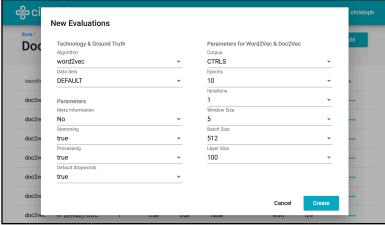
},
{
    ....
}
```

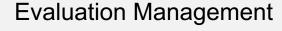
Implementation

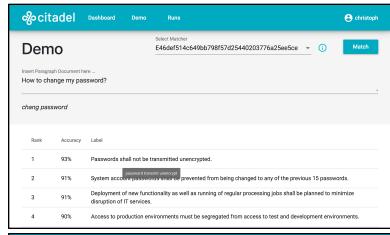
Management & Analysis GUI

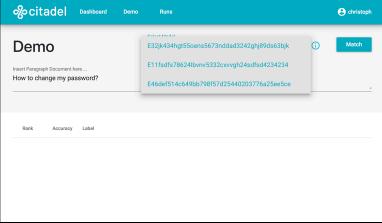




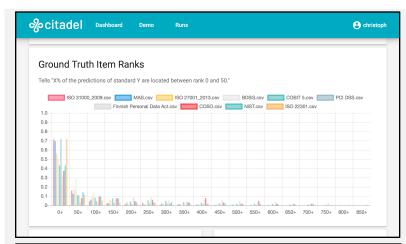


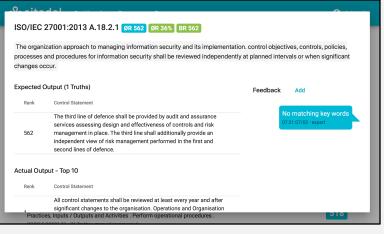






Evaluation Analysis – Demo





Evaluation Analysis – Evaluation Details & Feedback

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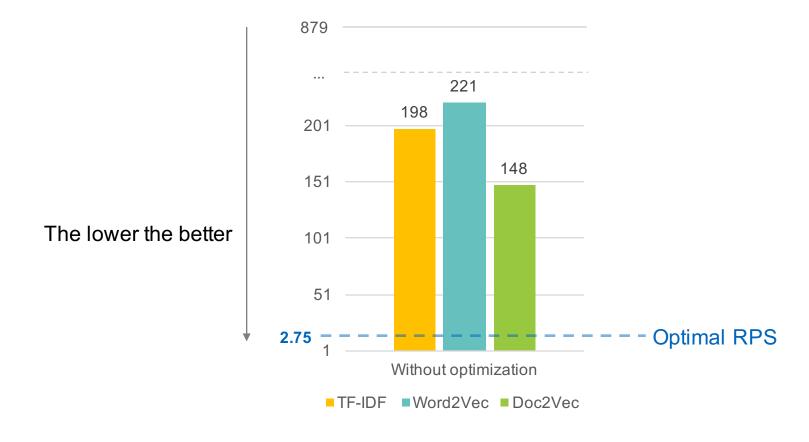
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Evaluations & Results

Evaluations & Results Initial Evaluation



- Quantitative Evaluation without any optimizations
- Optimal Average Rank (RPS) is 2.75 → Allows fully automation, but unrealistic

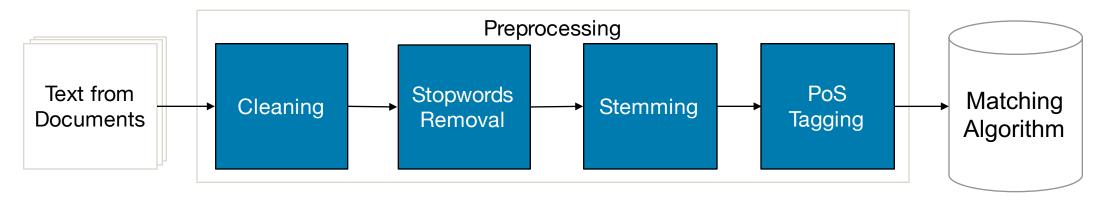


Evaluations & Results

RQ 3: Impact of Preprocessing Technologies on Matching Results



Examine of a selection of state-of-the-art preprocessing technologies



Example

User passwords shall be prevented from being changed to any of the previous 10 passwords.

Cleaning user passwords shall be prevented from being changed to any of the previous passwords

Stopwords R. user passwords prevented changed previous passwords

Stemming user password prevent chang previous password

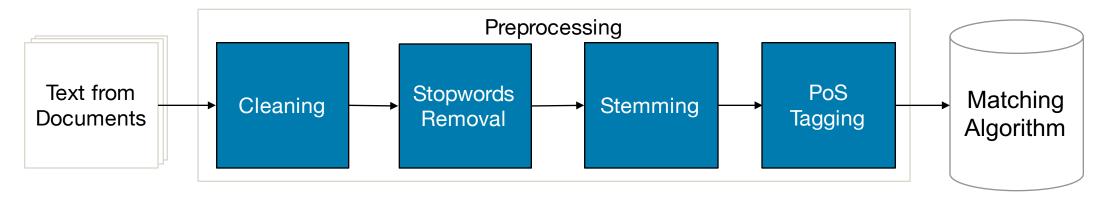
PoS Tagging user password password (only nouns)

Evaluations & Results

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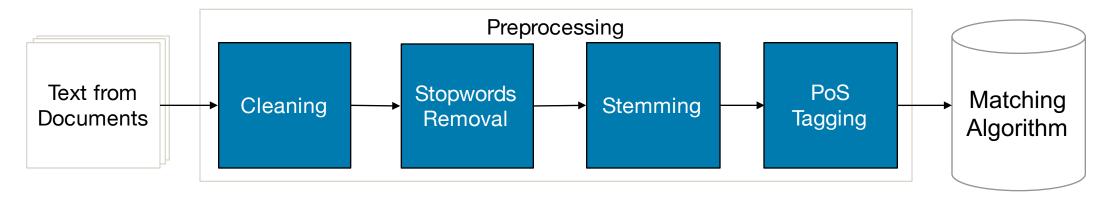
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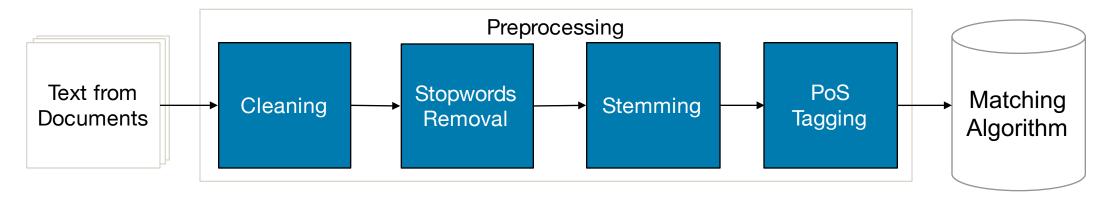
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RQ 3: Impact of Preprocessing Technologies on Matching Results



Examine of a selection of state-of-the-art preprocessing technologies



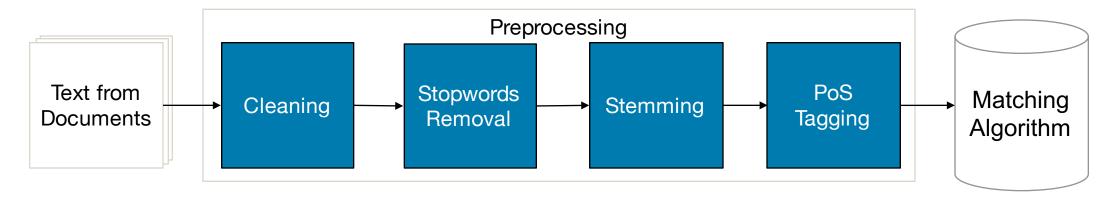
Example

	User passwords shall be prevented from being changed to any of the previous 10 passwords.
Cleaning	user passwords shall be prevented from being changed to any of the previous passwords
Stopwords R.	user passwords prevented changed previous passwords
Stemming	user password prevent chang previous password
PoS Tagging	user password password (only nouns)

RQ 3: Impact of Preprocessing Technologies on Matching Results



Examine of a selection of state-of-the-art preprocessing technologies



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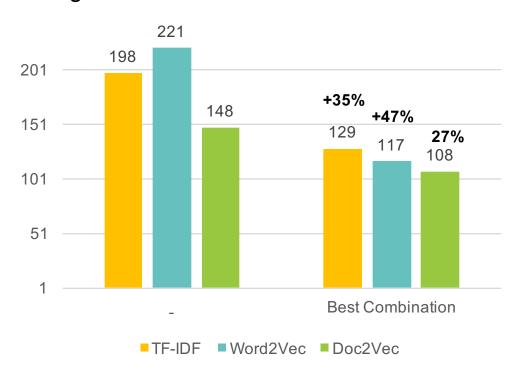
PoS Tagging user password password (only nouns)

RQ 3: Impact of Preprocessing Technologies on Matching Results



Results

- **Best Combination**
 - TF-IDF: Cleaning, stopwords removal, stemming
 - Word2Vec, Doc2Vec: Cleaning, stopwords removal, no stemming
- PoS Tagging had negative impact on results



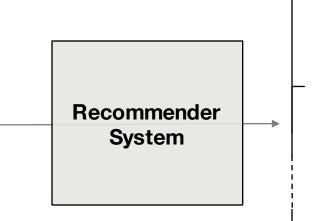
RQ 4: Addition of Meta Information to Control Statements



- Control statements are linked with meta information such as topic, subtopic, title and tags.
 - → Add information to control statements and examine the impact on matching results

Example

Do not allow an individual to submit a new password that is the same as any of the last four passwords he/she has used



1. User passwords shall be prevented from being changed to any of the previous 10 passwords.

Password History, Access Management, ...

Privileged account passwords shall be prevented from being changed to any of the previous 15 passwords. Password History, Access

Management, ...

879.Recovery from backup media shall be tested at least every year. Data Lifecycle

RQ 4: Addition of Meta Information to Control Statements



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Example

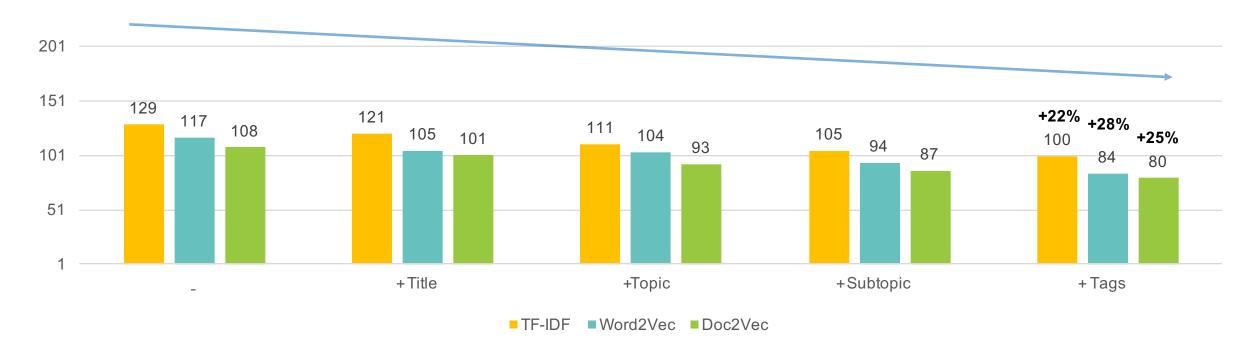
```
"id":
            "Control Statement Id 00033",
"topic": "Password Management",
"subTopic": "Password History",
"title": "User Password History Length",
"statement": "User passwords shall be prevented from being
  changed to any of the previous 10 passwords."
"tags":
            [ "Password History", "Access Management", ... ]
```

RQ 4: Addition of Meta Information to Control Statements



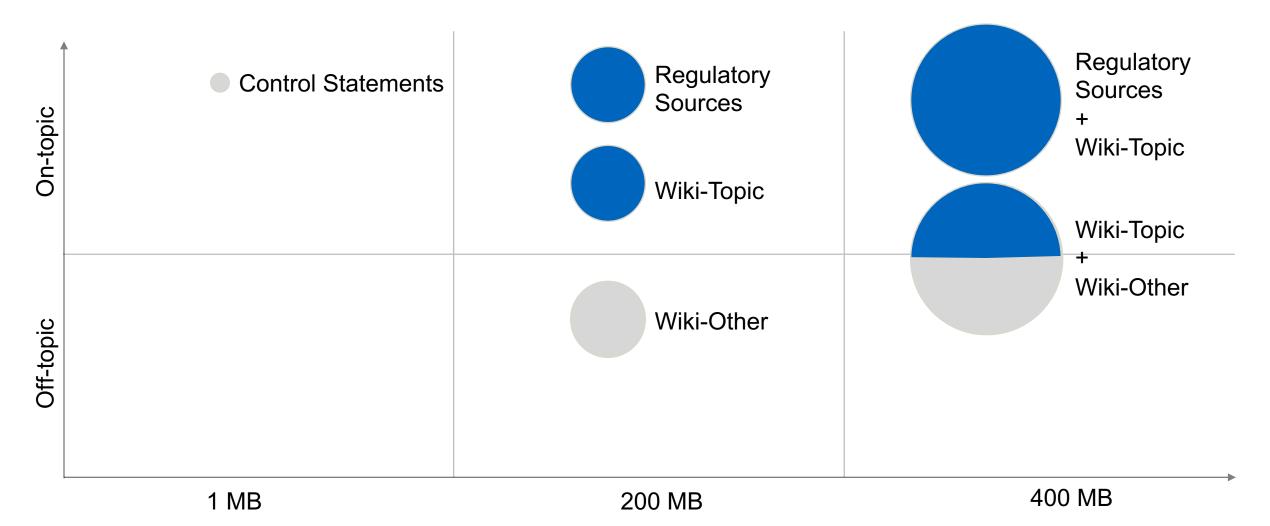
Results

- "The more meta information, the better the results"
- A deterioration could not be stated with available meta information.
 - General information that are not sufficiently disjunct to other control statements might worsen the RPS



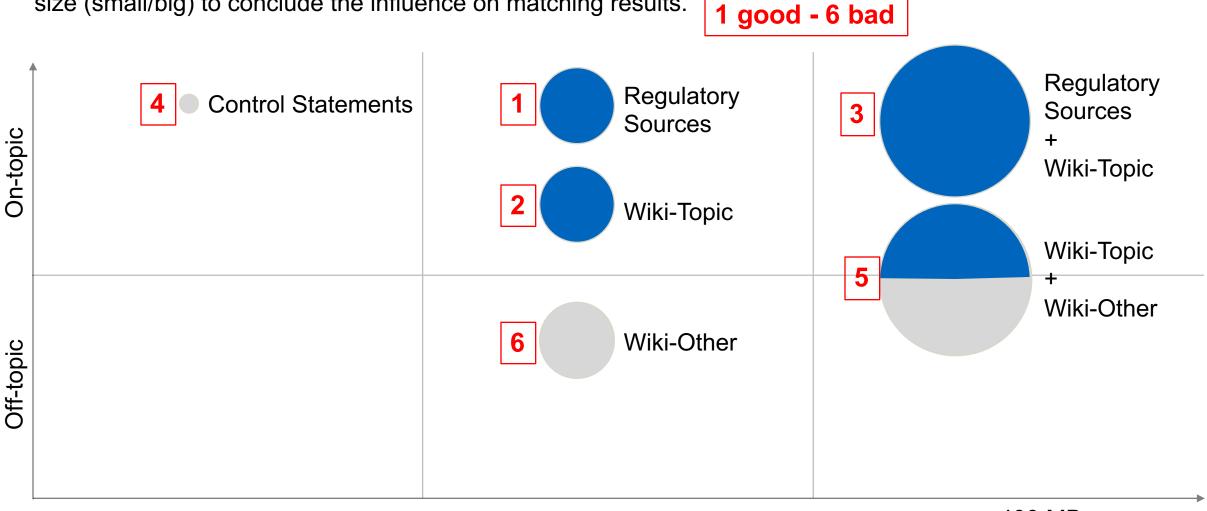


We investigate several corpora that differ in characteristics regarding content type (off-topic/on-topic) and size (small/big) to conclude the influence on matching results.





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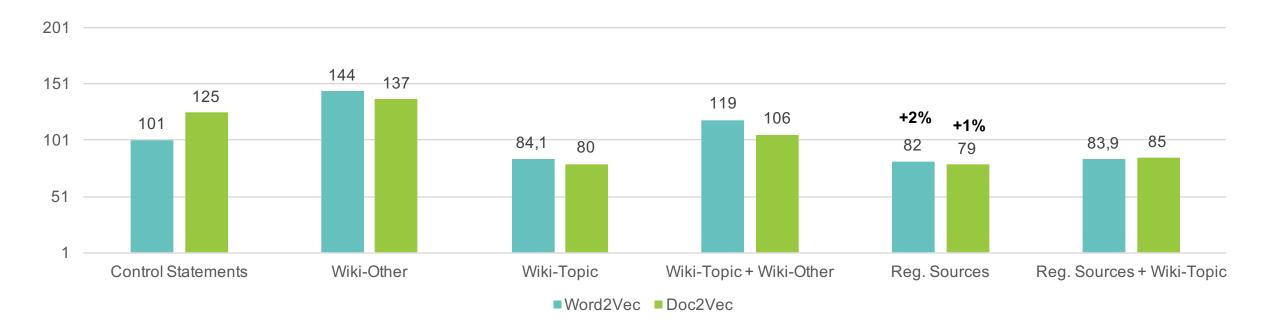


1 MB 200 MB 400 MB



Results

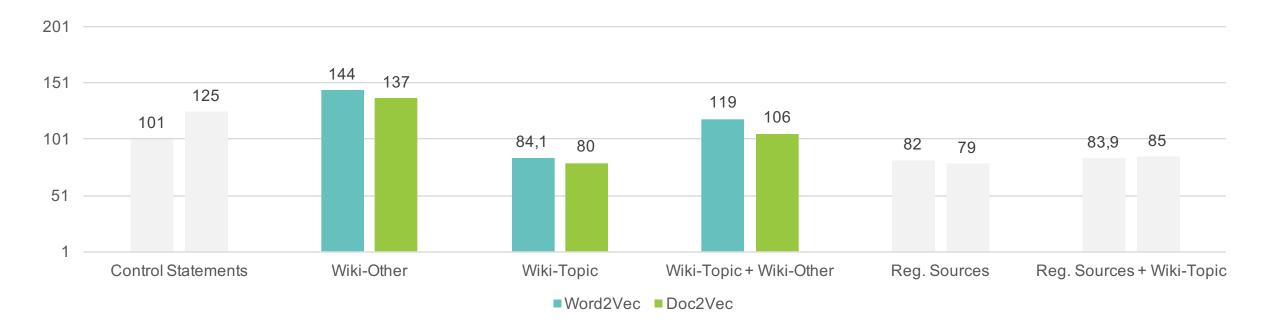
- On-topic corpus + off-topic corpus → slight improvements
 On-topic corpus + off-topic corpus → substantial deterioration
- Combination of on-topic corpus does not necessarily lead to better results





Results

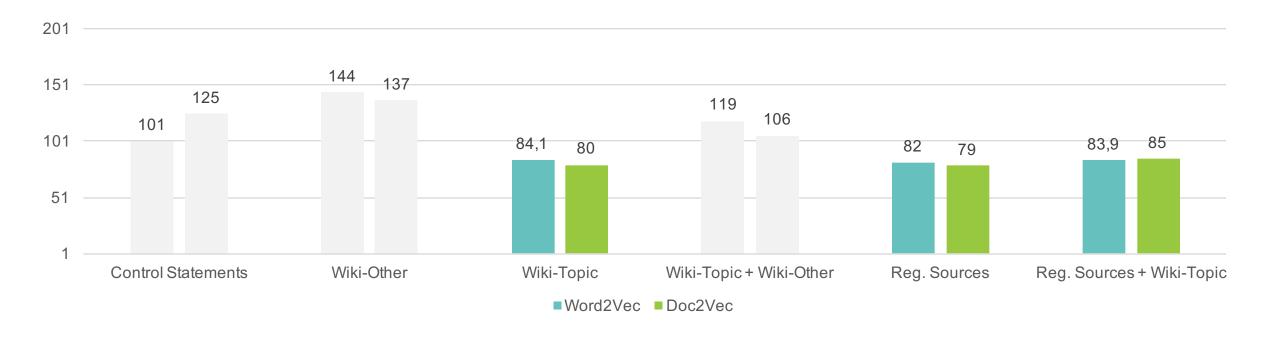
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Results

- On-topic corpus + off-topic corpus → slight improvements
 On-topic corpus + off-topic corpus → substantial deterioration
- Combination of on-topic corpus does not necessarily lead to better results



RQ 6: Addition of Context Information to Input Controls

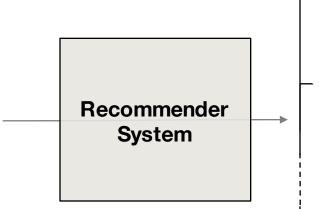


- Paragraph context of input controls, like section titles, often contains key words that might support the matching process.
 - → Extract context information and examine its impact

Evaluation

Do not allow an individual to submit a new password that is the same as any of the last four passwords he/she has used.

Implement strong access control measures



- User passwords shall be prevented from being changed to any of the previous 10 passwords. Password History, Access Management, ...
- Privileged account passwords shall be prevented from being changed to any of the previous 15 passwords. Password History, Access Management, ...

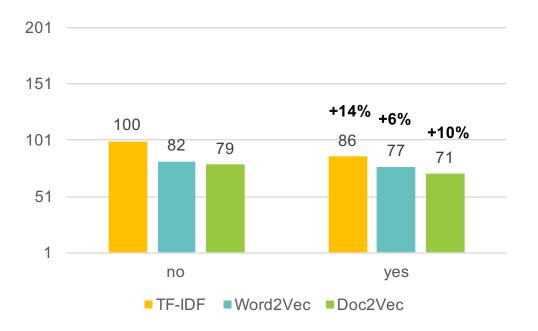
879.Recovery from backup media shall be tested at least every year. Data Lifecycle

RQ 6: Addition of Context Information to Input Controls



Results

Improvements for all approaches

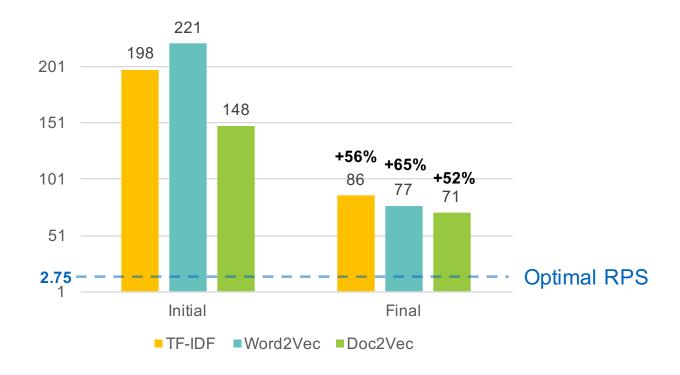


RQ 2: What text similarity approach performs best?



Results

- Doc2Vec performed best with an average rank of 71
- All in all, good and balanced performance of all approaches



171103 Matthes English Master Slide Deck (wide) © sebis

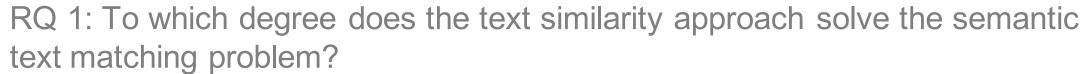
RQ 1: To which degree does the text similarity approach solve the semantic text matching problem?



- Expert interview with 4 experts using feedback sheet
 - Inspection of matching results of best recommender system (Doc2Vec, average rank 71)
 - Focus on the 209 worst matchings (outliers) to see future improvement potential

Questions

- For each of the 209 items: Are there reoccurring patterns?
- All in all, is the recommender system ready for productive use?





For each of the 209 matchings results: Are there reoccurring patterns?

- **Abbreviations**
 - → Use the document's list of abbreviation, if available, or any online service
- Short input
 - → Extract more context information of input controls
 - Special Case: Enumeration
- Missing synonyms
 - → Enrich meta information of control statements
- Imbalance in depth of content between input control and control statement (general > specific)
 - → Match Input with Controls that are already linked with control statements



RQ 1: To which degree does the text similarity approach solve the semantic text matching problem?

Levels of maturity:

- 1. Expert works (almost) exclusively with recommender system Effect: Significant time savings
- 2. Expert works with recommender system (50%) but also traditional method (50%) Effect: Medium time savings
- Expert uses recommender system only as cross-check and reassurance Effect: Improved data quality
- 4. No productive applicability yet



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Evaluations & Results Summary



- Preprocessing
 - Balanced the performance of the text similarity approaches
 - PoS Tagging has a negative impact on results
 - Stemming great effect on TF-IDF, but can have negative effect on Word2Vec and Doc2Vec
- A larger corpus does not necessarily lead to better results
 - → Corpus quality has a decisive influence on the matching quality
- Extending control statements or input controls by additional information (meta or context information) leads to great improvements, especially for shorter controls or statements
- Doc2Vec performs best, Word2Vec and TF-IDF also with good results
- Already ready for productive use:
 - cross-check and reassurance → improve data quality
 (already identified a number of cases where the manual initial mapping had errors)
 - But high number of outliers

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TLTT sebis

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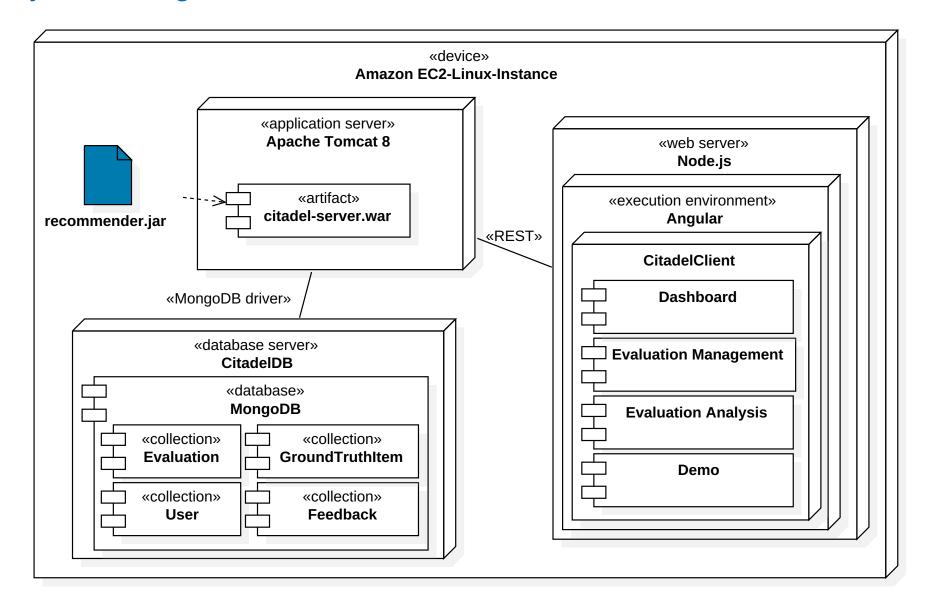
Boltzmannstraße 3 85748 Garching bei München

Christoph.erl@tum.de wwwmatthes.in.tum.de

BACKUP SLIDES

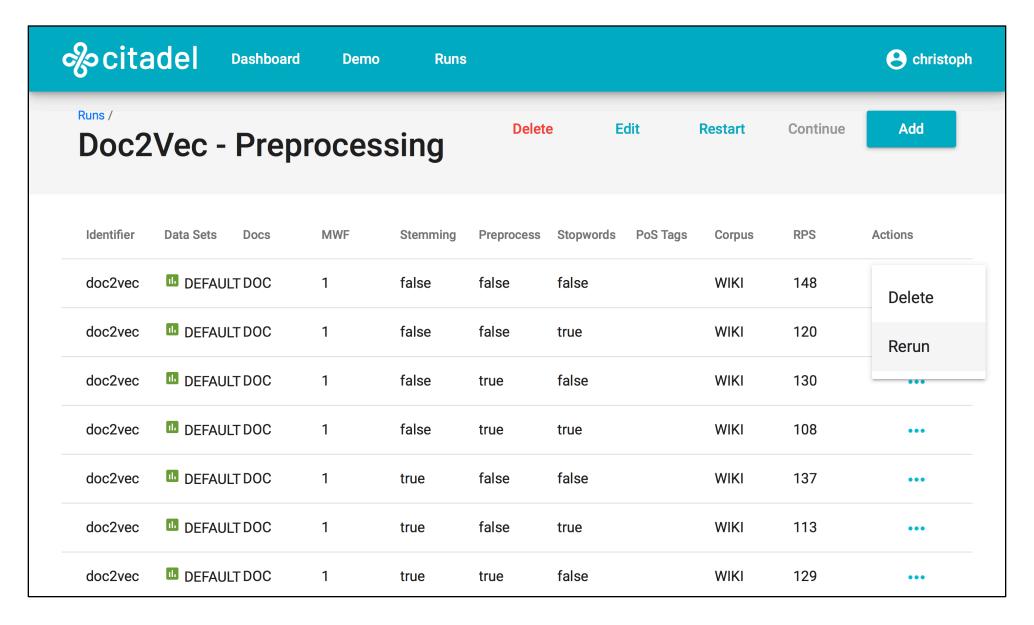
GUI: Deployment Diagram





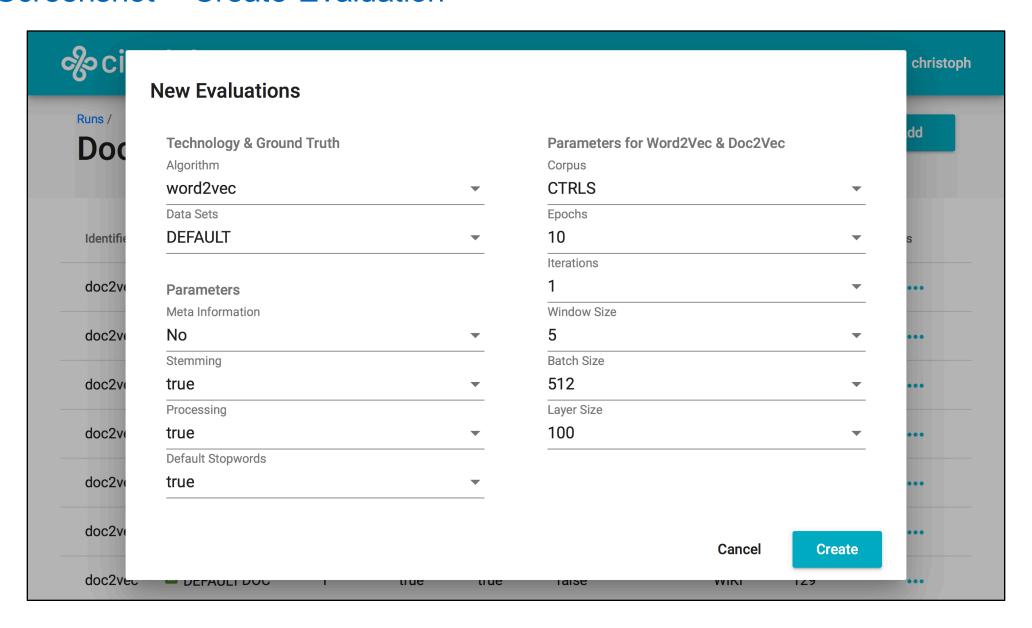
GUI: Screenshot – Evaluations





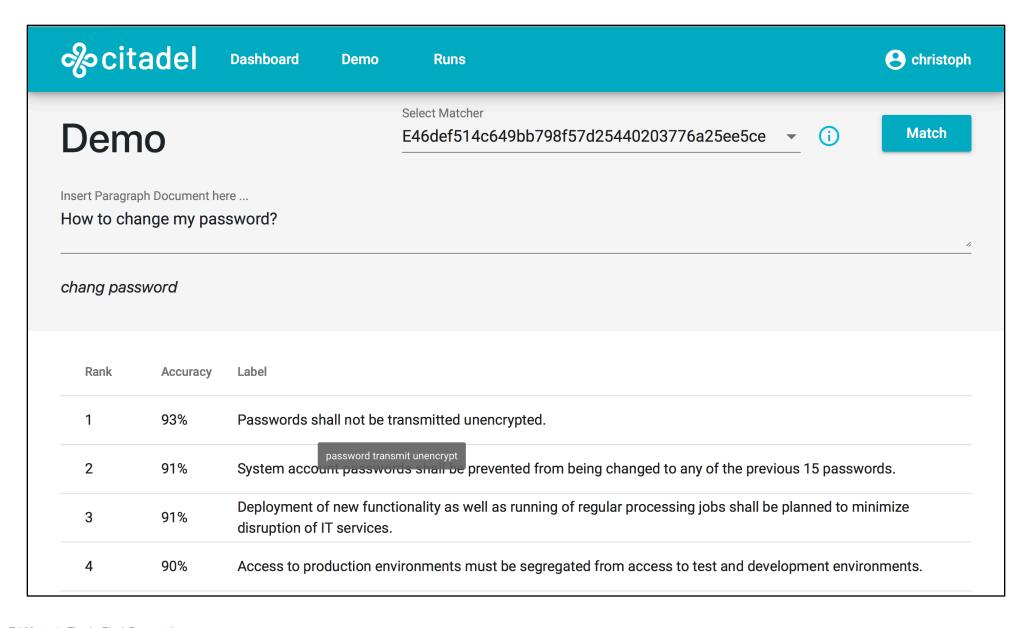
GUI: Screenshot - Create Evaluation





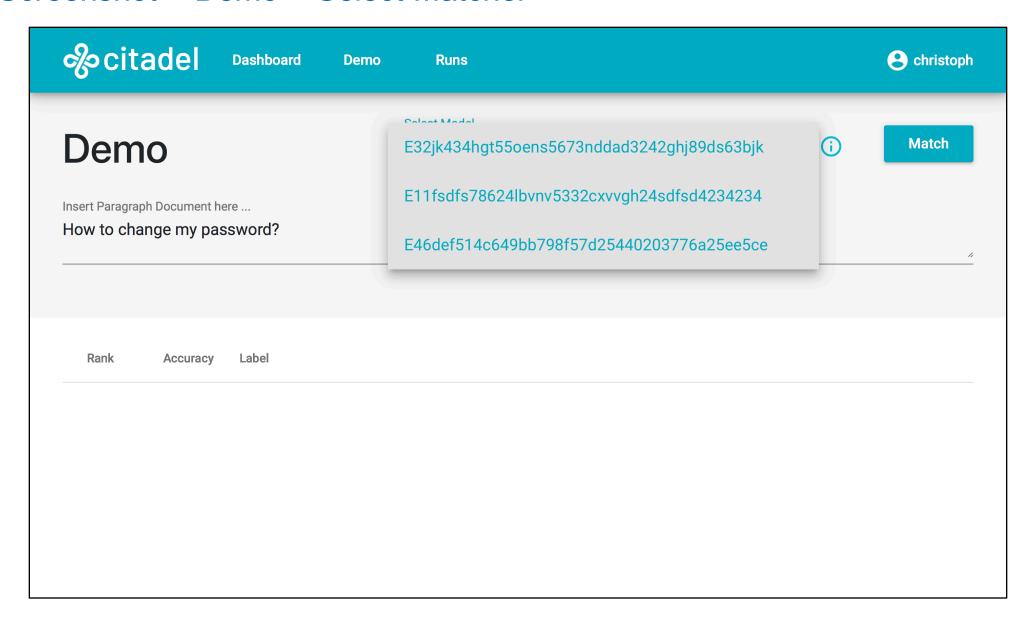
GUI: Screenshot – Demo





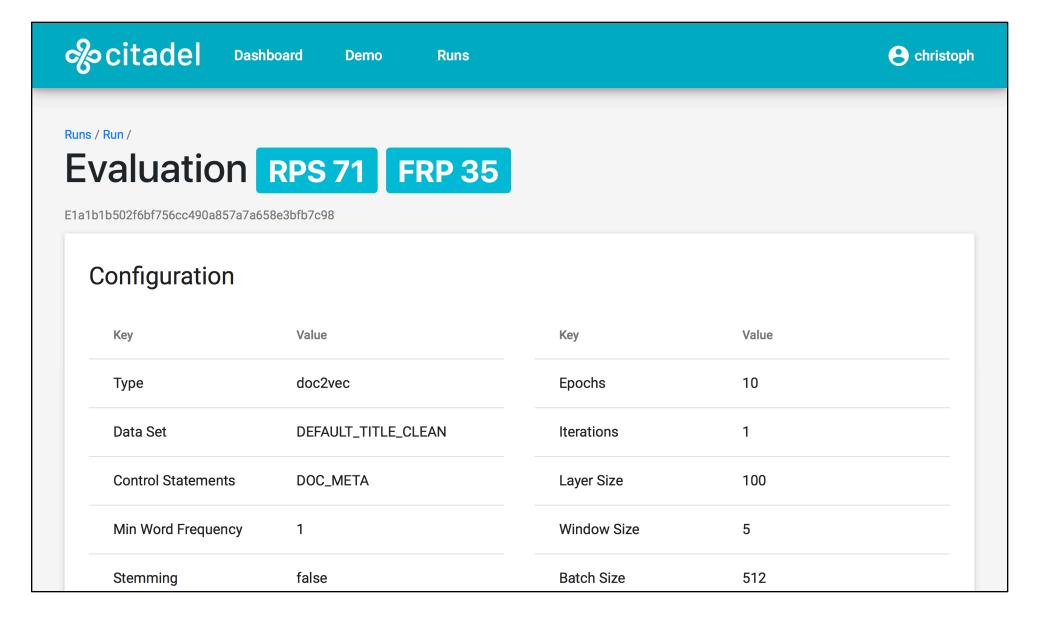
GUI: Screenshot – Demo – Select Matcher





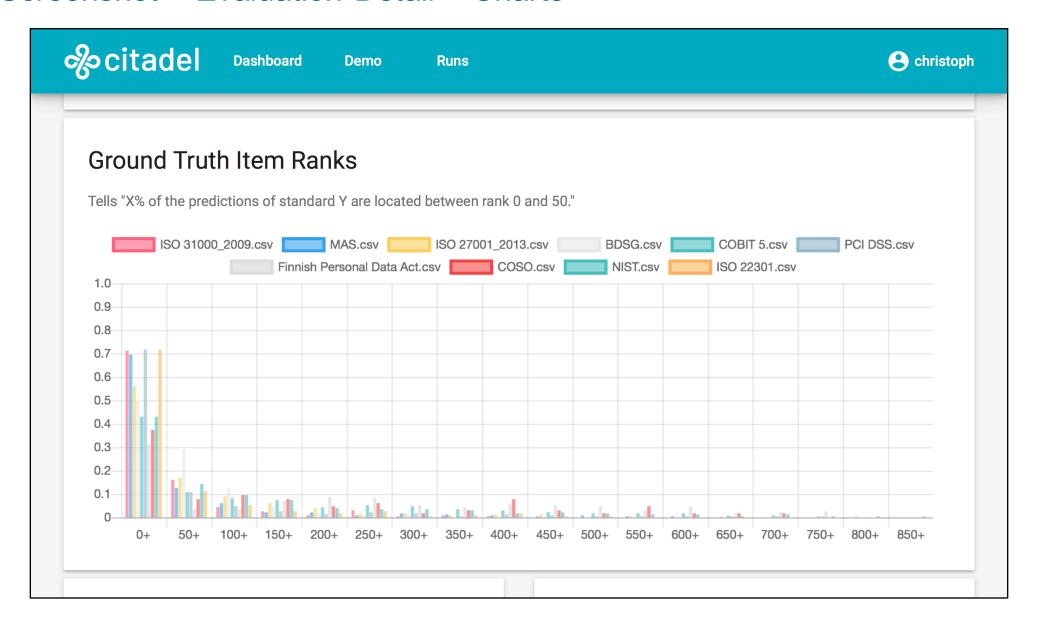
GUI: Screenshot - Evaluation Detail





GUI: Screenshot – Evaluation Detail – Charts





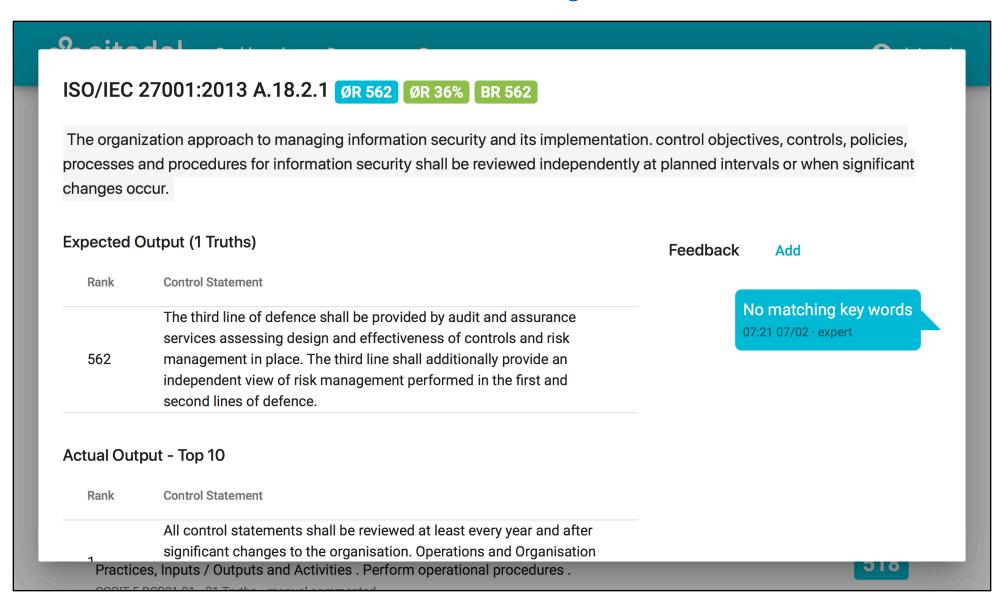
GUI: Screenshot – Evaluation Detail – Matching Results



%citadel Dashboard Demo Runs	e christoph
Ground Truth Items	
Item	Rank ↓
Rules for the acceptable use of information and of assets associated with information and information processing facilities shall be identified, documented and implemented Asset management . Responsibility for assets . Acceptable use of assets ISO/IEC 27001:2013 A.8.1.3 • 7 Truths • manuel commented.	749
Implement incident response procedures in the event unauthorized wireless access points are detected. Examine the organization incident response plan (Requirement . to verify it defines and requires a response in the event that an unauthorized wireless access point is detected . Interview responsible personnel and / or inspect recent wireless scans and related responses to verify action is taken when unauthorized wireless access points are found . For example: In the case of a single standalone retail kiosk in a shopping mall, where all communication components are contained within tamper-resistant and tamper-evident casings, performing a detailed physical inspection of the kiosk itself may be sufficient to provide assurance that a rogue wireless access point has not been attached or installed . However, in an environment with multiple nodes (such as in a large retail store, call center, server room or data center), detailed physical inspection is difficult . In this case, multiple methods may be combined to meet the requirement, such as performing physical system inspections in conjunction with the results of a wireless analyzer Regularly monitor and test networks . Regularly test security systems and processes .	617
PCI DSS v3.1 11.1.2 • 2 Truths • manuel commented. Event detection information is communicated to appropriate parties. Detectet . Detection Processes	616

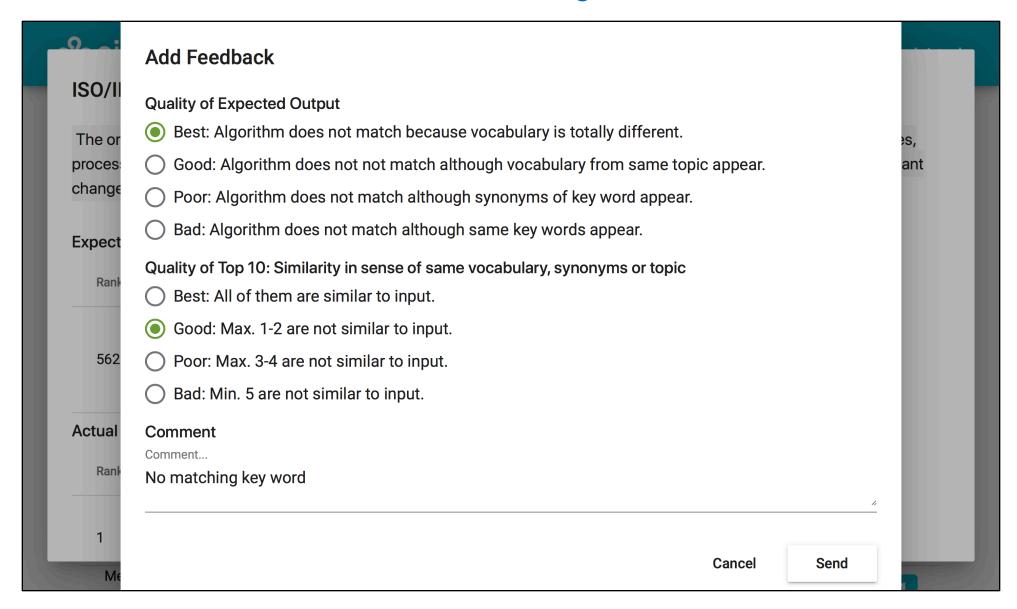
GUI: Screenshot – Evaluation Detail – Matching Result





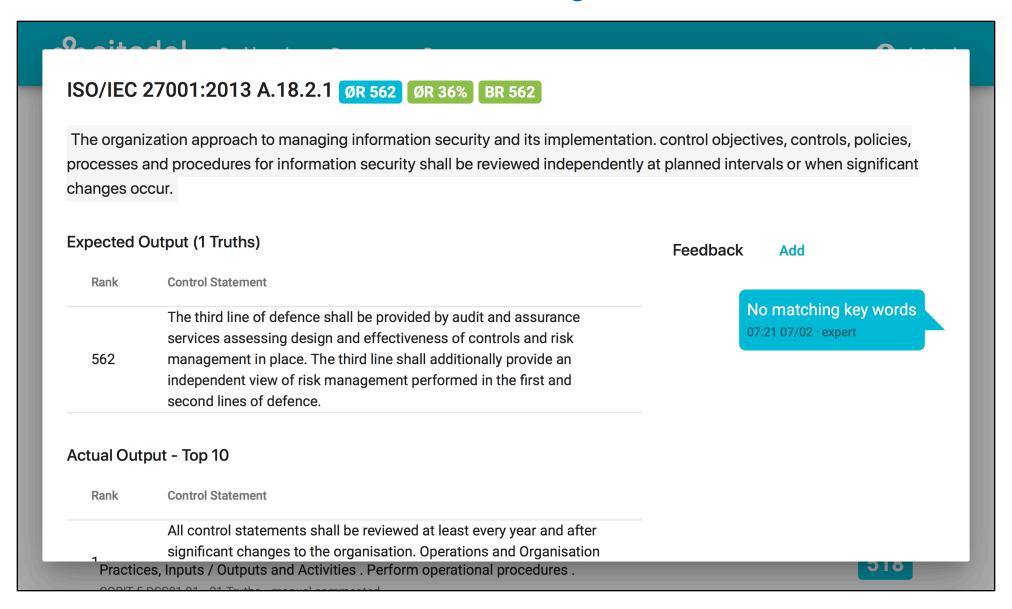
GUI: Screenshot – Evaluation Detail – Matching Result Feedback





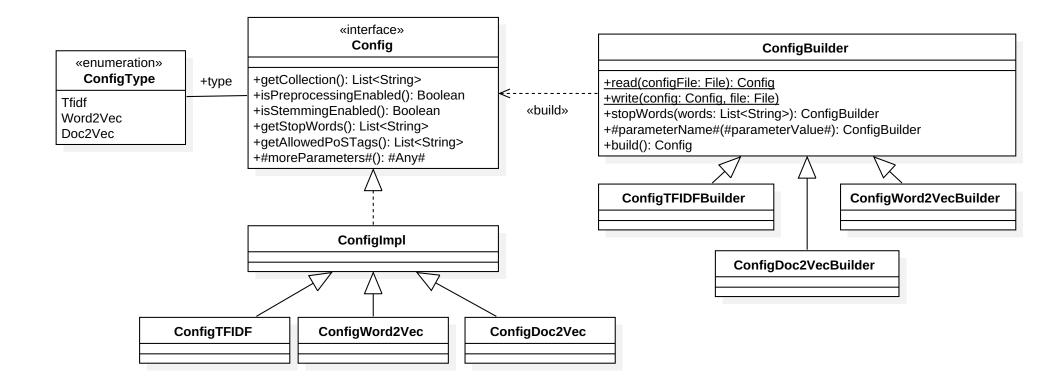
GUI: Screenshot – Evaluation Detail – Matching Result





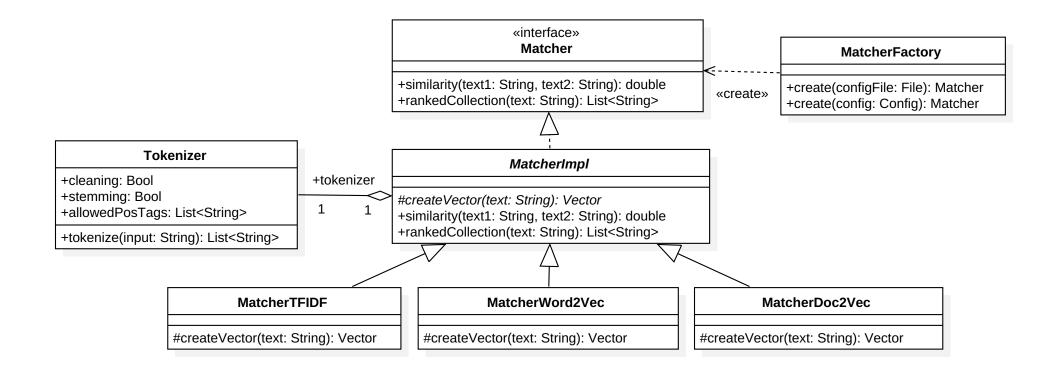
Recommender System: Configuration





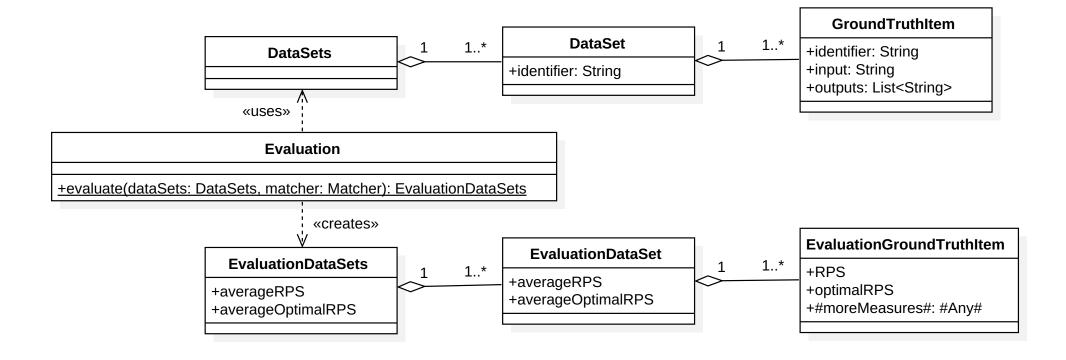
Recommender System: Matcher





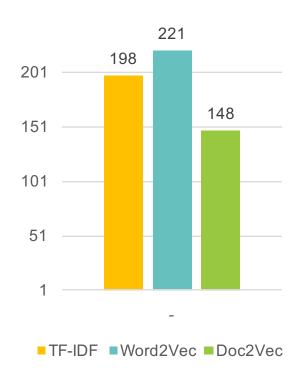
Recommender System: Evaluation





Evaluation & Results Initial Evaluation

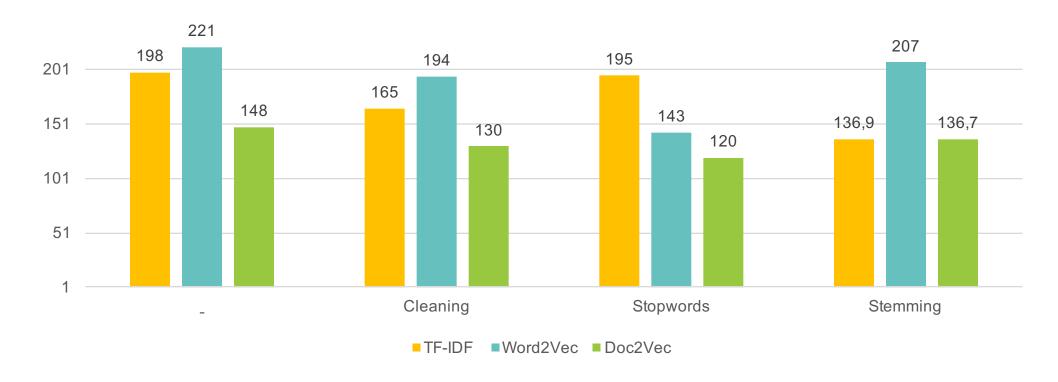




72

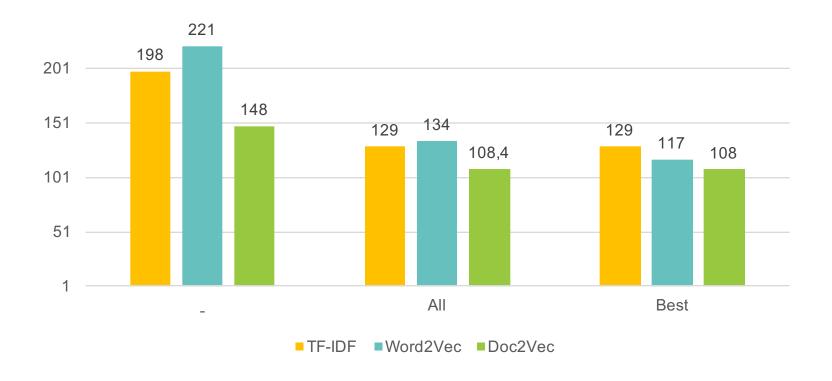
Preprocessing – Separate Application





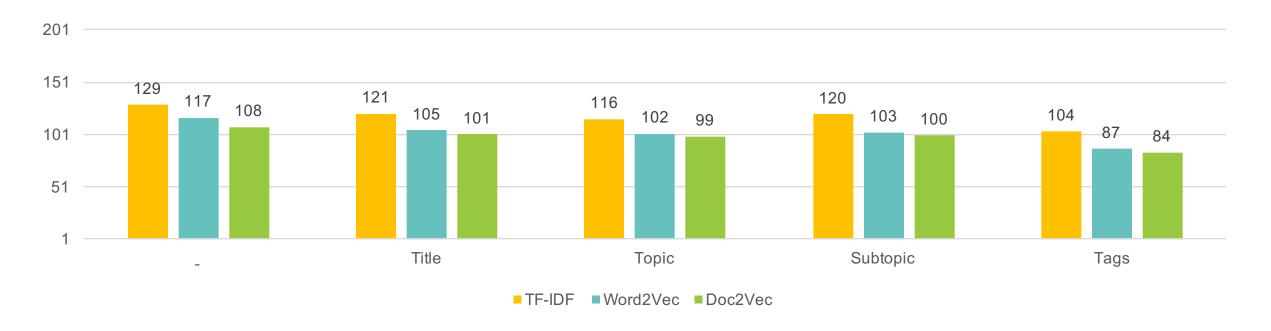
Preprocessing – Combined Application





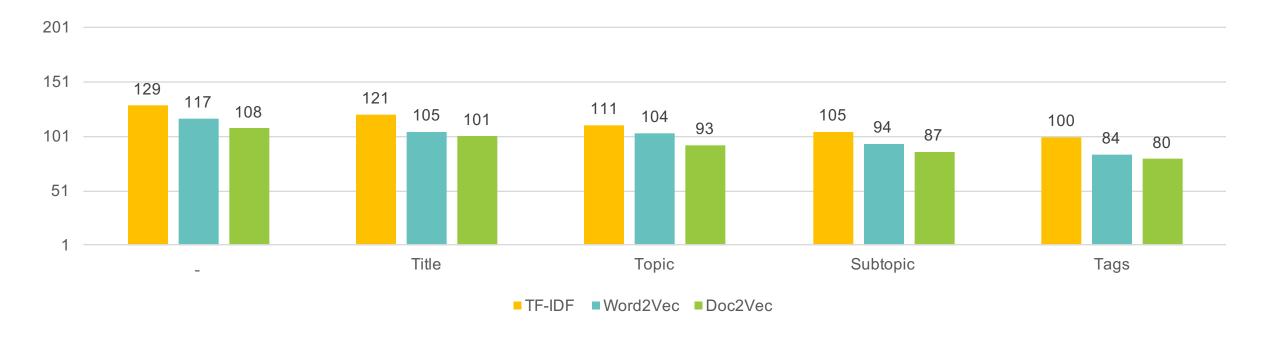
Addition of Meta Information – Separate Addition





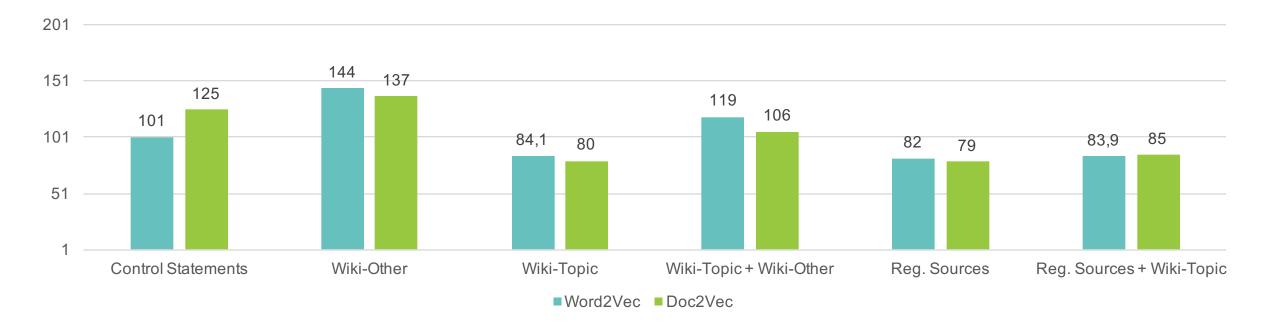
Addition of Meta Information – Combined Addition





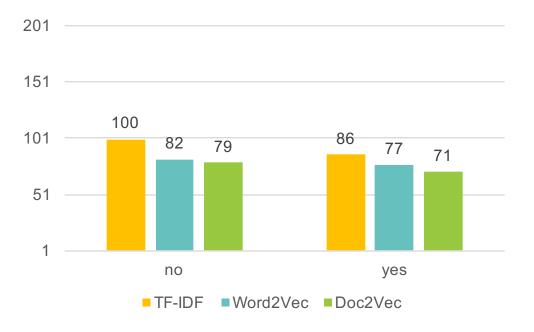
Evaluation & Results Corpora Analysis





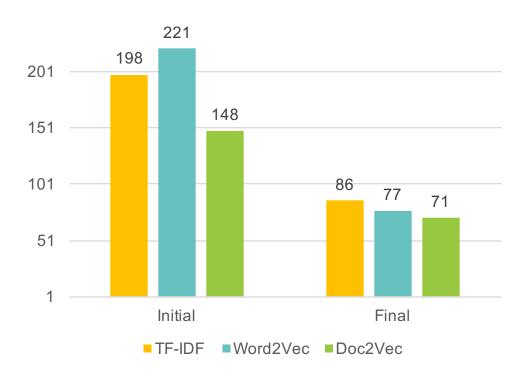
Evaluation & Results Addition of Context Information





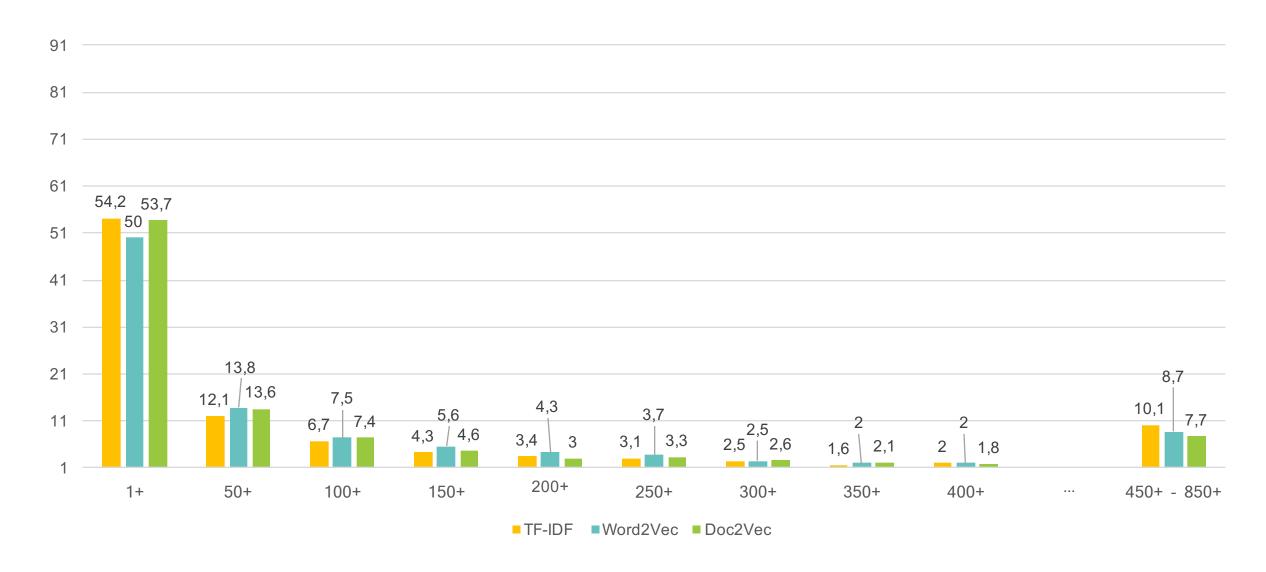
Evaluation & Results Final Evaluation





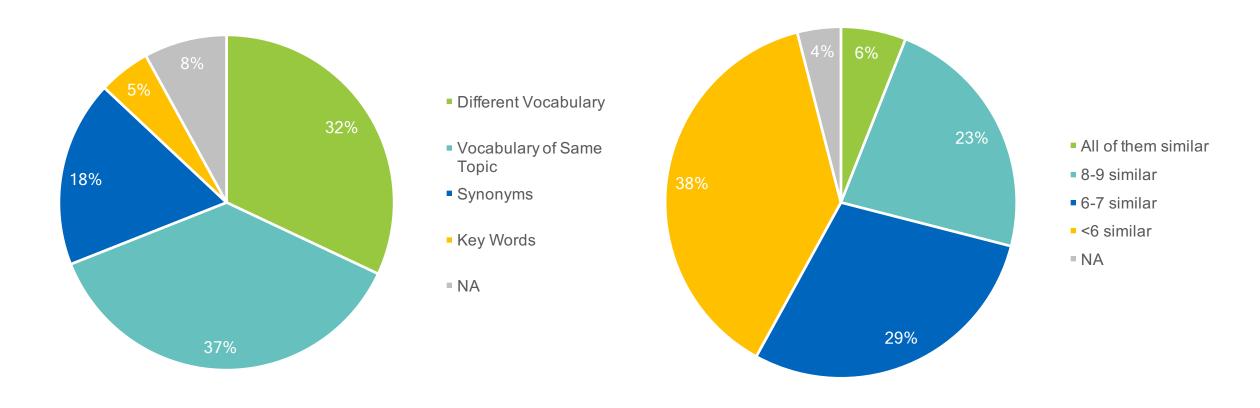
Evaluation & Results Final Evaluation





Evaluation & Results Outlier Analysis





Code Text To Vector



```
input : Text text, TFIDFVocabCache cache
  output: Vector[] vector

1  words ← Tokenize(text)

2  vector ← InitialiseVector(Count(cache))

3  for word in words do

4  | get cache index for word, calculate TF-IDF value and put value to vector

5  index ← IndexOf(word,cache)

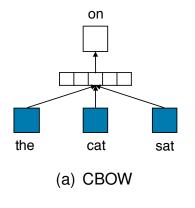
6  | vector[index] ← CalculateTFIDF(word)

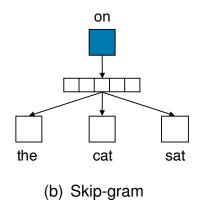
7  end
```

Word2Vec, Doc2Vec

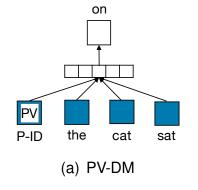


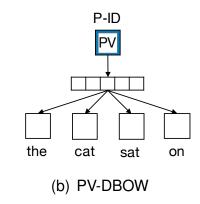
Word2Vec





Doc2Vec





Ground Truth



Regulatoy Document	#Paragraphs	Ø Words/Paragraphs
BDSG ²	24	362.88
COBIT ³ 5 2012	191	32.02
COSO ⁴ 2013	16	18.94
Finish Personal Data Act 523/1999	29	164.24
ISO 22301:2012	37	122.46
ISO 27001:2005	133	24.86
ISO 31000:2009	46	95.17
MAS-TRMG ⁵ 21	268	52.00
NIST ⁶ C2M2 Cyber Security Framework v1.1	95	9.02
PCI DSS ⁷ v3.1	161	170.16
All Ground Truths	1000	74.30
All Control Statements		21.55