



## CYBERSECURITY

### [Model Rule for Securities Administrators Approved by NASAA](#)

The North American Securities Administrators Association (NASAA) this week approved an information security model rule package aimed at improving the cybersecurity posture of the 17,543 state-registered advisers.

The proposed model would require state-registered investment advisers to establish written cybersecurity policies and procedures designed to safeguard clients' records and information, and to deliver its privacy policy annually to clients. It provides investment advisers with a design structure for their data security policies and procedures. [Read more](#)

### [Law Firm Domain Names Spoofed to Launch Phishing Scams](#)

It is not unusual for lawyers to send emails to individuals and businesses they are about to sue to engage them before they do file suit to see if a settlement can be discussed or reached. The lawyer will reach out via email with a copy of the proposed Complaint, and tell the individual or business that they are about to be sued, that the Complaint is attached or in a link, and that if the individual does not respond within 7-10 days, the Complaint will be filed. [Read more](#)

## VIRTUAL CURRENCY

### [New FinCEN Cryptocurrency Guidance Clarifies Applicability of Anti-Money Laundering Regulations to Virtual Currency Business Models](#)

The Financial Crimes Enforcement Network (FinCEN) is the U.S. Treasury Department bureau charged with monitoring financial transactions in order to combat domestic and international money laundering, terrorist financing, and other financial crimes.

Under FinCEN's Bank Secrecy Act/Anti-Money Laundering regulations, money transmitters and other money service businesses are required to develop anti-money laundering/countering the financing of terrorism (AML/CFT) policies, including know your customer and suspicious activity reporting (SAR) procedures. [Read more](#)

## DATA SECURITY

### [The WhatsApp Hack – Practice Good Phone Hygiene and Update Your Apps](#)

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WhatsApp, the popular instant messaging app, announced a hack and the exposure of a security flaw this week. The flaw put malware onto users' phones, potentially exposing their otherwise encrypted data and messages. WhatsApp allows users to instant message and make phone calls throughout the world. The app features described on its website include simple, secure, and reliable messaging, and it is widely known for encrypting messages between users. [Read more](#)

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## NEW + NOW

### [Fully-Executed Contracts Are Preferred](#)

We have been involved in several situations lately with security incidents where we ask our clients for the final executed contract with the vendor that we believe caused the incident, but the contract that we receive has not been fully executed by both parties. Without getting into the legal implications of not having a fully executed contract in place between the parties, on a practical level it is always better to have a contract that has been signed by both parties when you are trying to use it to assert that the other party has not met its obligations under the contract or is responsible for costs associated with a security incident. [Read more](#)

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## PRIVACY TIP #191

### [Trying to Protect Your Medical Information—Let's Ask Questions About Data Security](#)

April 2019 was the worst month ever for reported data breaches since the Office for Civil Rights (OCR) began requiring covered entities and business associates to report them in 2010. This week's privacy tip discusses how to protect personal and patient medical information. [Read more](#)

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