

## What Financial Firms Need to Know

### The Big Picture

The SEC's revamped Regulation S-P redefines data privacy expectations across financial services. The rule expands from a compliance requirement to a demand for ongoing, enterprise-wide accountability and board engagement in managing data risk.

### 4 Key Takeaways for Financial Institutions

#### 1 Governance, Not Just Privacy

Reg S-P now elevates data protection to a board and enterprise-risk issue. Firms must demonstrate evidence-based compliance and coordination among cybersecurity, privacy, compliance, and risk teams.

**⚡ Action:** Review board charters and oversight structures to ensure digital risk (cyber, AI, data) is explicitly governed.

**How RadarFirst Helps:** Automates incident documentation and provides an auditable trail for regulators and boards.

#### 2 New Breach Notification Rules

The rule introduces mandatory customer notifications with strict timelines, including a 72-hour notice window for service providers. “Unreasonable delay” is no longer acceptable.

**⚡ Action:** Test and update incident-response playbooks. Define who determines materiality and trigger notifications.

**How RadarFirst Helps:** Decision-support workflows help teams determine breach impact and notify customers within required timeframes.

#### 3 Vendor Oversight Is Critical

Third-party service providers are now firmly in scope. Outsourcing does not transfer risk.

**⚡ Action:** Revisit contracts for breach-notification clauses, risk-rank suppliers, and include key vendors in tabletop exercises.

**How RadarFirst Helps:** Enables centralized visibility into vendor risk and shared data obligations.

#### 4 Continuous Risk Assessment & Documentation

The SEC expects continuous, evidence-based compliance and not static policies.

**⚡ Action:** Implement a recurring risk-assessment cycle that tests data controls, validates safeguards, and documents every action taken.

**How RadarFirst Helps:** Provides ongoing compliance evidence and automates record-keeping to satisfy regulators.