

Secure and Compliant Data Management in FinTech Applications

Prof. Lionel Briand, FNR PEARL Chair

UL 3X3 FinTech lecture series, February 10th, 2017

FinTech @ SnT Centre

- **SnT:** Luxembourg's center on ICT Security, reliability and Trust
- > **260** staff members
- **31** partners
- **FinTech:** One of SnT's priorities
- **Increasing momentum:** 5 FinTech partners, 7 projects, 2 laboratories



Alphonse Weicker Foundation



Software Verification and Validation @ SnT

- Group established in **2012** (FNR PEARL)
- **Focus:** Ensuring reliability and security of IT systems through automated, cost-effective V&V solutions, e.g., testing
- **ERC** Advanced Grant
- ~ 25 staff members
- Industry partnerships

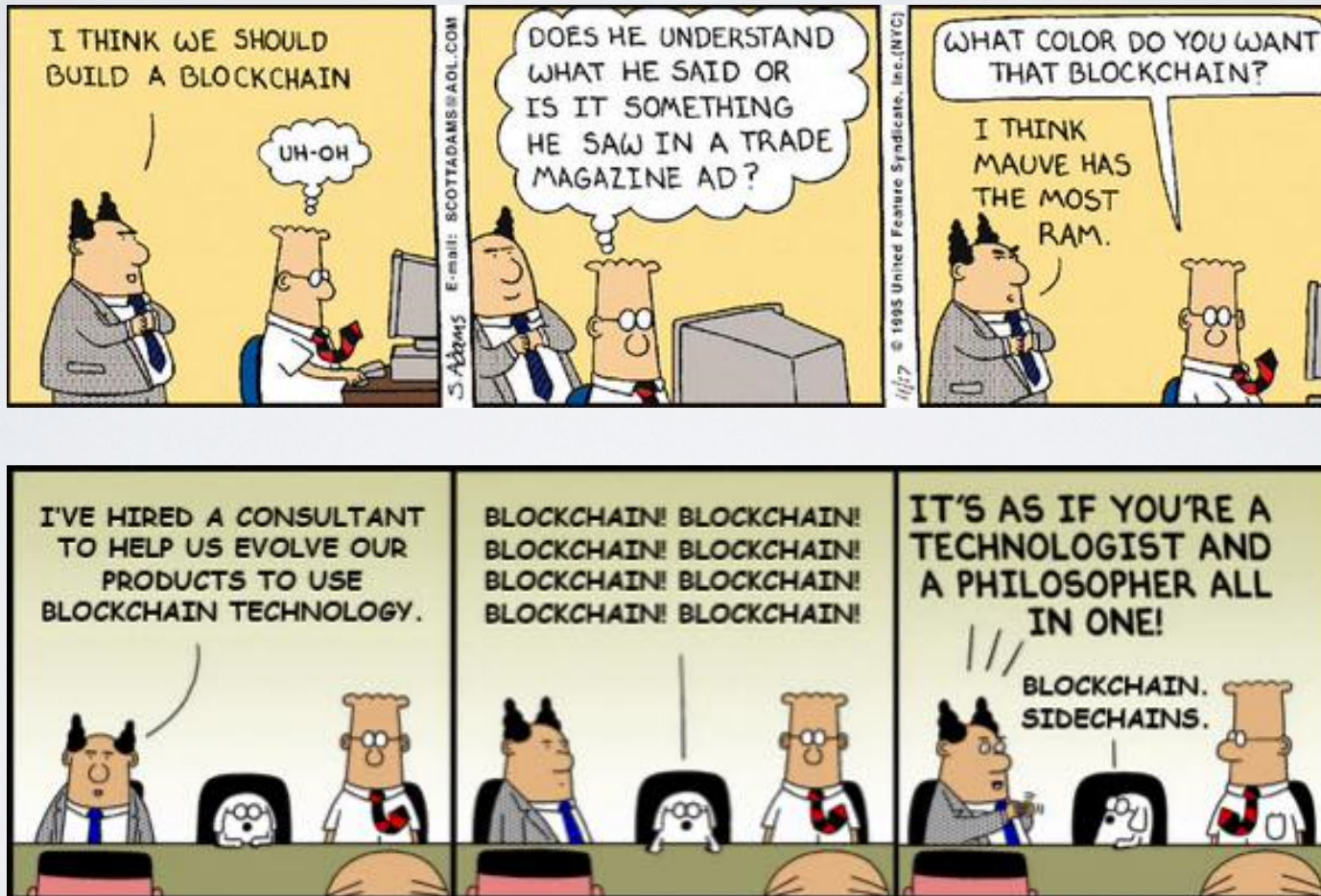


Objectives

- Create **awareness** about the challenges and **solutions** for ensuring secure and compliant data management in **FinTech applications**
- Motivate the need for **research and innovation**
- **Non-technical** presentation
- **Not** meant to be a **complete treatment** of the subject matter

FinTech

Not Just about the B Word



FinTech: State of Play

- **\$14.5 billion globally** in venture capital in 2015, from \$7.3 billion in 2014
- FinTech companies are **proliferating**
- Wide range of solutions that promise to **impact nearly everyone**
- Dramatically broaden the **reach, flexibility, and level of innovation** of financial services
- Key challenge: **Cybersecurity**
- **Risks:** Financial losses, undermine confidence, lower adoption

Cybersecurity: Risk Factors

- “All that matters is to get to market fast” mentality
- **Growing mismatch** between technology and regulations
- **Dilemma:** Consumer protection versus the agility of the innovation ecosystem

Cybersecurity: Risk Factors

- Reliance on **machine learning** and big data complicates the picture regarding cybersecurity – unintended biases in system behavior
- Many new “customers” with **little knowledge** of security risks
- **More interfaces** between traditional financial services and FinTech applications

Did I manage to worry you?

How Secure is our Data?

N.Y. / REGION

In Hours, Thieves Took \$4

04 Thieves Jam Up Smucker's Bank

MAR 14



Jam and jelly maker **Smucker's** last week shut its website because of a security breach. Closer examination of the attack suggests it was carried out by a group of hackers — including at least one credit card processor — that infiltrated some of the world's biggest

Bank

Mike Sn



(Photo: Sp

30 MasterCard, VISA Warn

MAR 12



VISA and **MasterCard** are alerting banks across the country

THE W

Home World U.S. Politics E



Car Insurers Find Tracking Devices Are a Tough Sell



Apple News Is a Rocky Start



TECH

CurrentC, Retailers' Tool Hacked

Email Addresses Taken During Pilot Project

Home > Data Protection > Data Breach

NEWS ANALYSIS

European Central Bank hacked



By **Brian Honan** | Follow

CSO | Jul 31, 2015 8:22 AM PT

RELATED TOPICS

Data Breach

1 COMMENT



INSIDER



The [European Central Bank](#) (the ECB) announced on [Thursday the 24th of July](#) that its website was the victim of a cyber-attack resulting in the security of the site being compromised. The attack resulted in a breach of the security for a database serving its public website. The database is

JPMorgan Chase Data Breach (2014)

- Compromised over **83** million accounts - **76** million households and **7** million small businesses
- Also, targeted **9** other major financial institutions alongside JPMorgan Chase



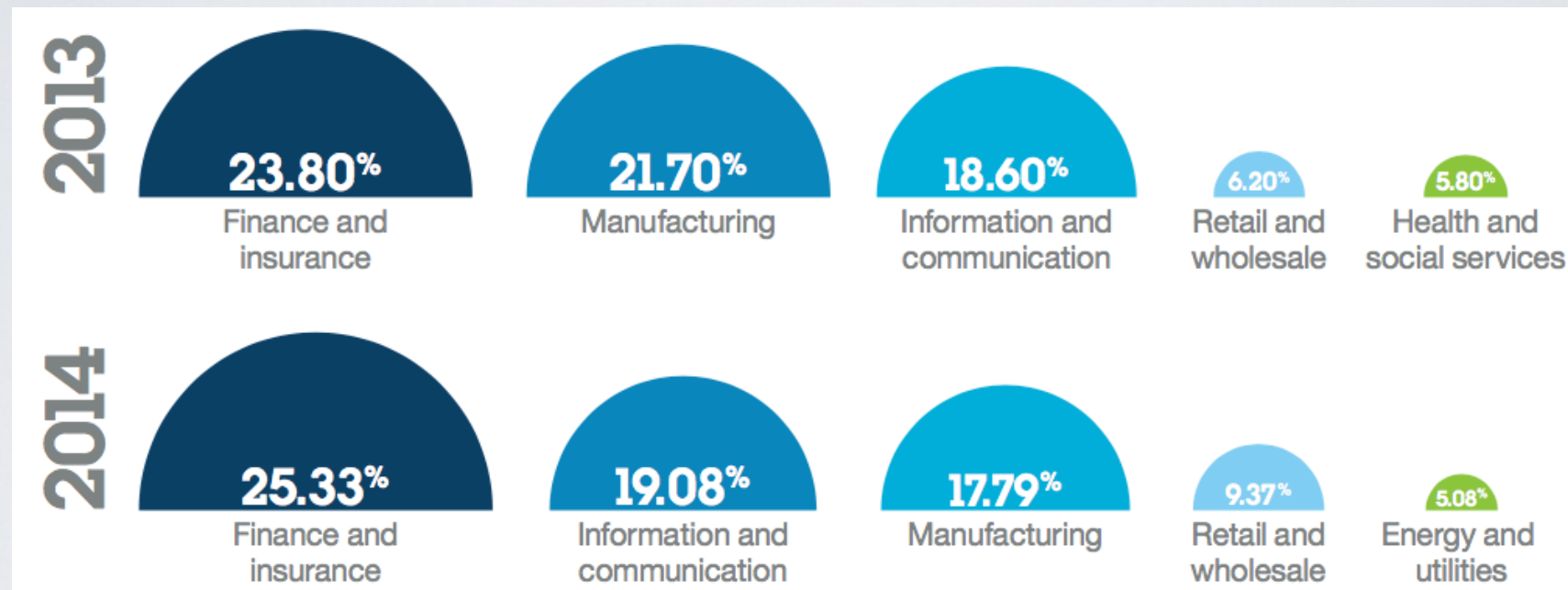
UK's Tesco Bank Hack in Nov 2016

- Biggest cyber attack in the history of British banking
- **£2.5 million** stolen from accounts of **9000** customers
- Approximately **40,000** Tesco Bank accounts were compromised
- The fine could be as much as **£2 billion** pounds under the GDPR rules.



Some Statistics about Cybersecurity

Incident rates by industries



Source: IBM Security - data from worldwide organisations having between 1,000 and 5,000 employees

Financial Impact of Data Breaches

- Study of **383** companies in **12** countries
- **\$4** million is the average total cost of a data breach
- **29%** increase in total cost of data breach since 2013
- **\$158** is the average cost per lost or stolen record
- **15%** increase in per capita cost since 2013



2016 Cost of Data Breach Study: Global Analysis

Benchmark research sponsored by IBM
Independently conducted by Ponemon Institute LLC
June 2016



Ponemon Institute® Research Report

Are FinTech Applications Different?

- Most FinTech applications are **web applications or services**, possibly with a mobile front end – they are subject to the **same security challenges** as many other systems
- FinTech applications handle **sensitive data** and perform **business-critical operations**
- For now transactions are relatively limited, but **risk factors are even more acute** than in traditional financial services

These cryptocurrency institutions have suffered intrusions resulting in stolen financials, or shutdown of the product. Nearly all closed down afterward.

Nearly every attack could have been prevented:

- Social Engineering / Credential Reuse
- Account Takeover of Cloud Hosting
- Application Vulnerability

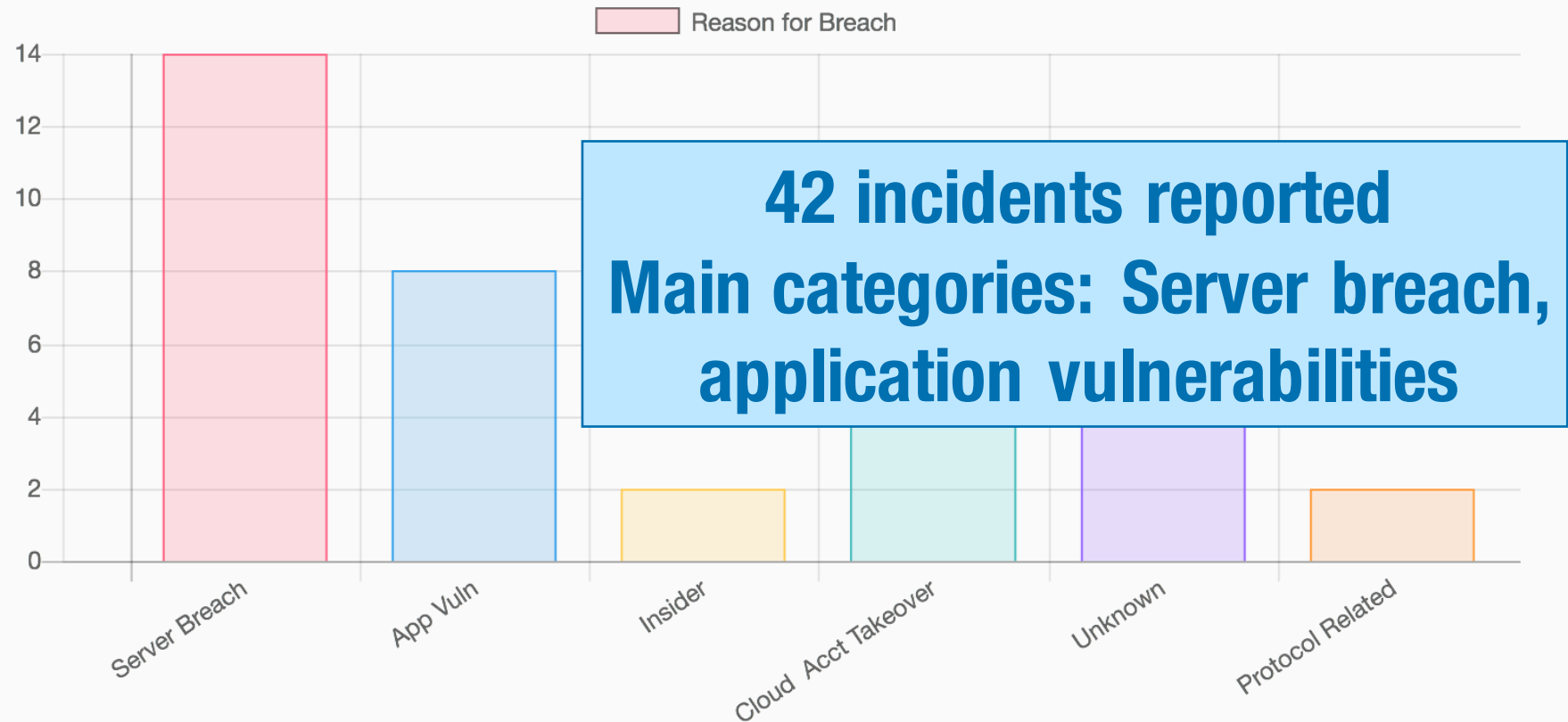
Each root cause is below, with a link to more information in the breach.



<https://magoo.github.io/Blockchain-Graveyard/>

ROOT CAUSE ESTIMATES

The data below is roughly gleaned from publicly available data about **42** incidents.



COINWALLET

Application vulnerability due to a lack of input sanitation, type unknown, though it does reference a “database call” which implies some form of database injection like `SQLi`.

Strangely, they claim that no coins were lost, though CoinWallet shut down anyway.

It is with great regret that we announce the closure of CoinWallet.co. Our decision to close is based on

Vulnerability: Database injection

Consequence: Data breach

Conclusion: “This incident prompted us to reassess the viability of running coinwallet.co and it was decided it is just not viable taking into consideration the risk, costs and time involved.”

Effective immediately, we have reset all passwords, deleted all API keys, and halted the entire app. Do not

This incident prompted us to reassess the viability of running coinwallet.co and it was decided it is just not viable taking into consideration the risk, costs and time involved.

Summary

- FinTech applications handle **sensitive user and corporate data**
- Data breaches can ruin a FinTech company's **reputation** and lead to significant **financial damages** and legal problems
- FinTech applications **must be secure** from a data management point of view
- Regulations are becoming **more stringent**, including the GDPR European legislation on data privacy

Secure data management cannot be ensured during development

- **Root causes**
 - **time to market pressures,**
 - **lack of disciplined programming,**
 - **third-party solutions (services, components).**

Consequences

- **Many applications have problems with**
 - **incomplete or improper security requirements,**
 - **inadequate security architecture,**
 - **implementation flaws,**
 - **lack of systematic and effective testing,**
 - **...**

Compliance with Standards and Regulations

Compliance

Regulations for FinTech **domains**

*microfinance, crowdfunding, cashless payment,
cryptocurrencies, ...*

Regulations & Standards for FinTech **IT Systems**

primarily concerned with data protection and privacy

Example from Payment Services

- **PSD2: Payment Services Directive (EU directive)**



- “In order to improve the efficiency of payments throughout the Union, **all payment orders** initiated by the payer and denominated in euro or the currency of a Member State whose currency is not the euro, including credit transfers and money remittances, **should be subject to a maximum 1-day execution time**. For all other payments, such as payments initiated by or through a payee, including direct debits and card payments, in the absence of an explicit agreement between the payment service provider and the payer setting a longer execution time, **the same 1-day execution time should apply**.”

Security and Privacy

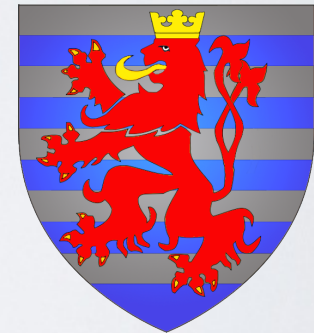
- **Security certification**

- On a voluntary basis
- Business advantage



- **Laws and regulations**

- Compliance is mandatory
- Luxembourg's implementation of EU Directive 95/46/EC
- General Data Protection Regulation (GDPR)



GDPR

- **Sweeping powers** for national data protection agencies
- Fines of up to 4% of annual turnover for major breaches
- **Major new requirements**, including:
 - Reporting major data breaches within 72h
 - Privacy by design
 - Client's right to be forgotten
- **Verified technical and organizational measures** necessary for demonstrating security



Industry Security Standards

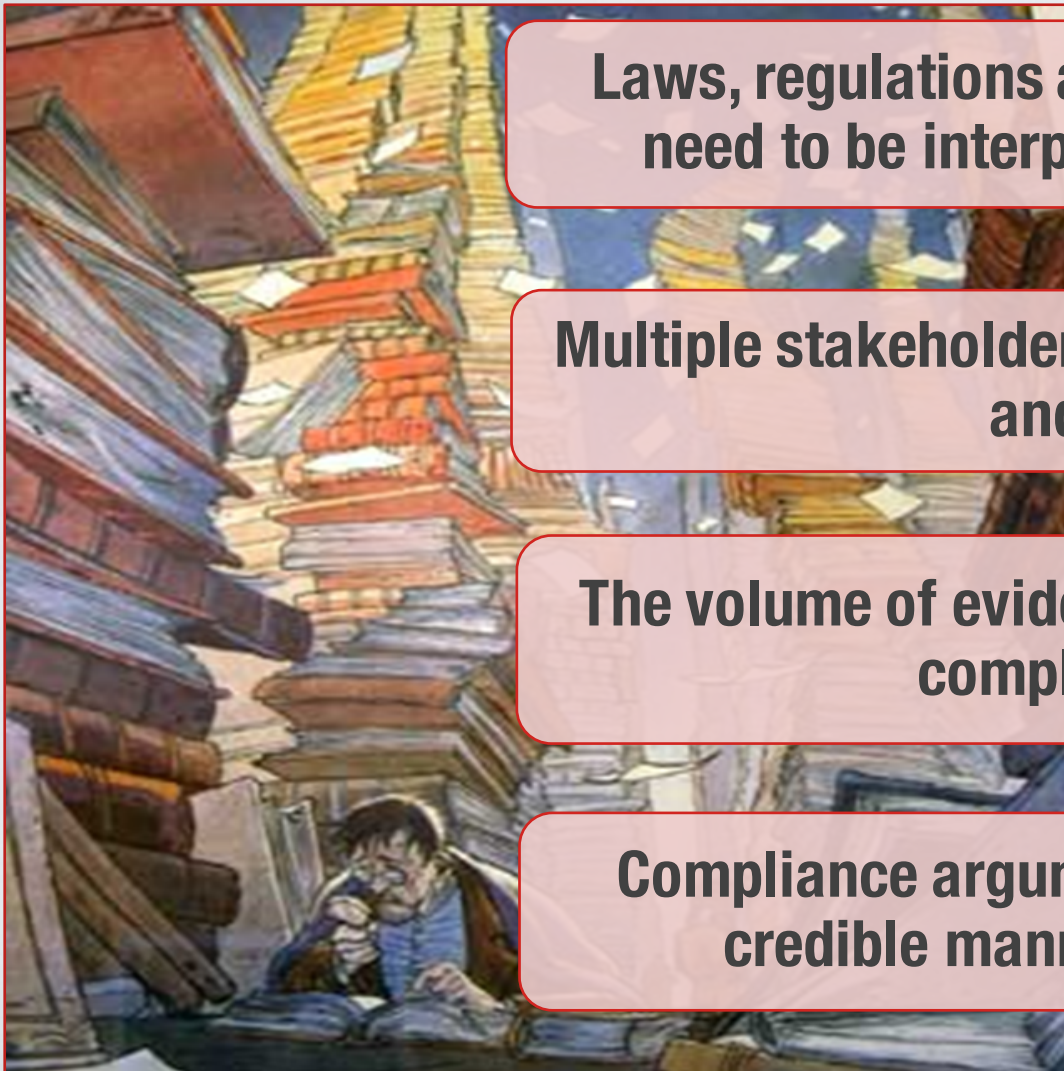
- Payment Card Industry Data Security Standard (**PCI DSS**)
- Proprietary information and security standard for organizations that handle **branded credit cards**
- Increase **control** on credit card data and reduce credit card **fraud**
- Annual validation of compliance by **Qualified Security Assessors**

OWASP

- Open Web Application Security Project (OWASP)
- Share relevant software security information and **good practices**
- <https://www.owasp.org/>

T10	OWASP Top 10 Application Security Risks – 2013
A1 – Injection	Injection flaws, such as SQL, OS, and LDAP injection occur when untrusted data is sent to an interpreter as part of a command or query. The attacker's hostile data can trick the interpreter into executing unintended commands or accessing data without proper authorization.
A2 – Broken Authentication and Session Management	Application functions related to authentication and session management are often not implemented correctly, allowing attackers to compromise passwords, keys, or session tokens, or to exploit other implementation flaws to assume other users' identities.

Compliance is Complex and Expensive



Laws, regulations and standards are textual. They need to be interpreted and adapted to context

Multiple stakeholders are involved in the compliance and auditing chain

The volume of evidence required for demonstrating compliance is very large

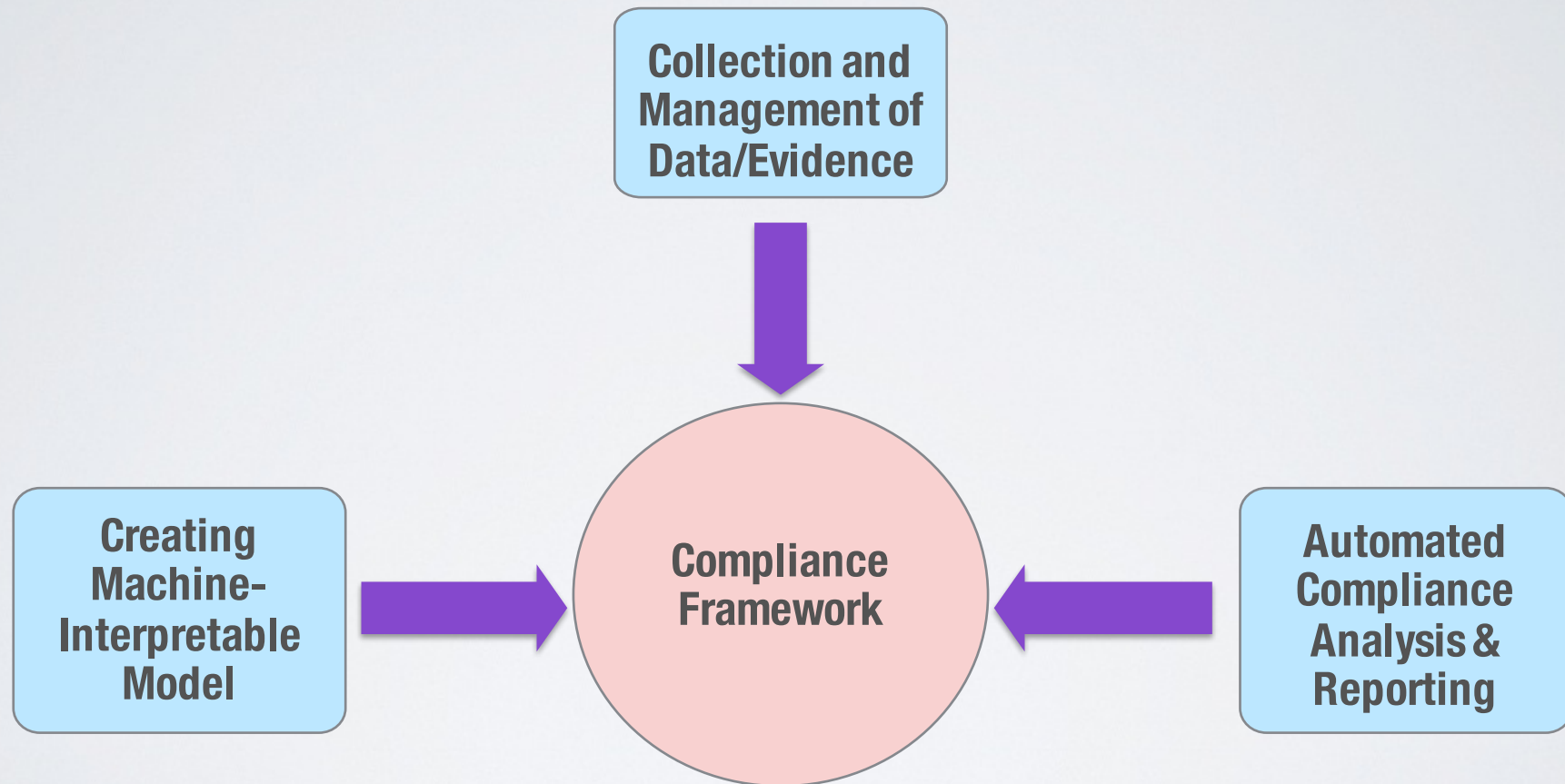
Compliance arguments need to be assessed in a credible manner and based on evidence

What can we do?

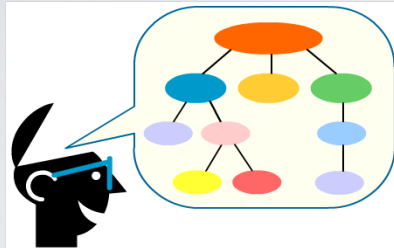
Compliance to Safety Standards

- **Safety-critical systems** have been subject to safety certification for several decades
- **Rigorous compliance assessment** is common practice for safety
- The level of rigor is very likely to extend to data protection and privacy in future years
- Existing work on safety certification can be a **major source of experience and inspiration**

Solution Components

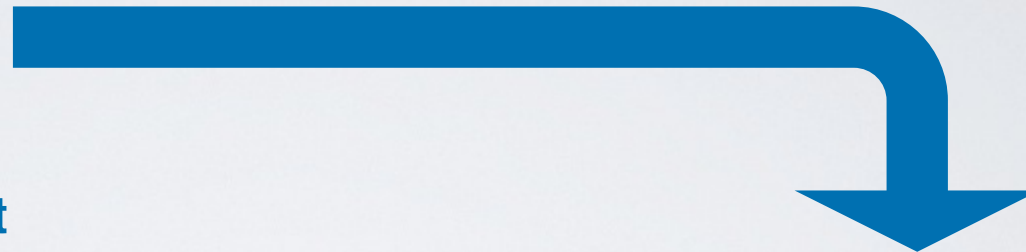


Example Model

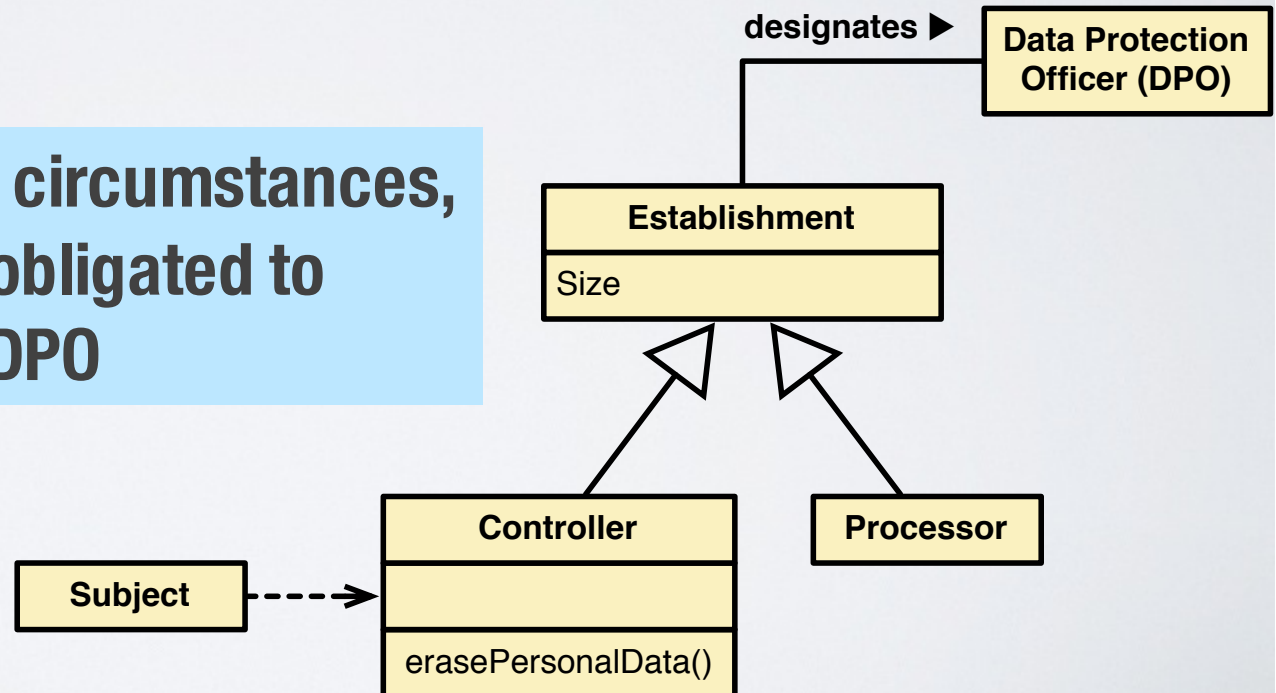


Subject Matter Expert

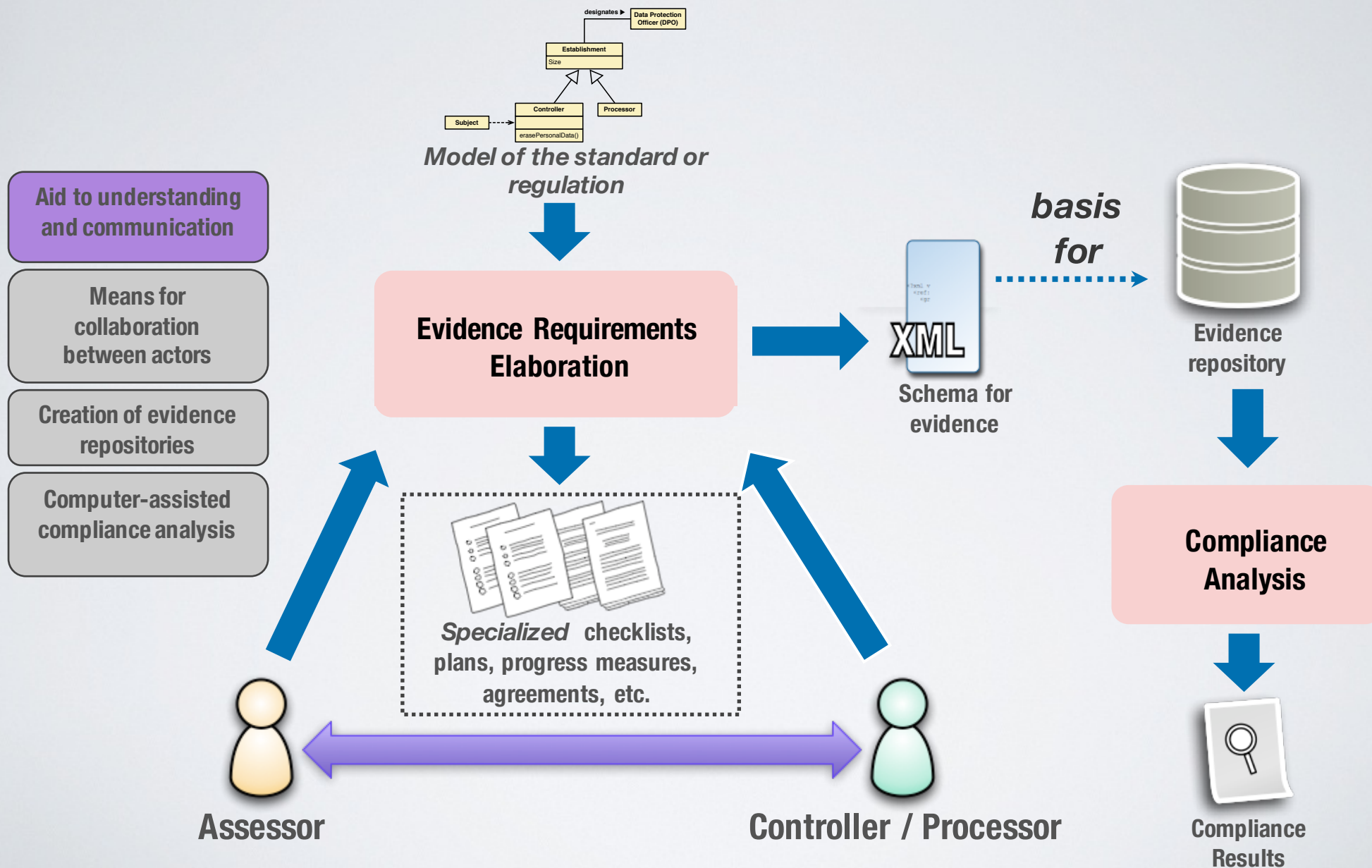
GDPR Interpretation



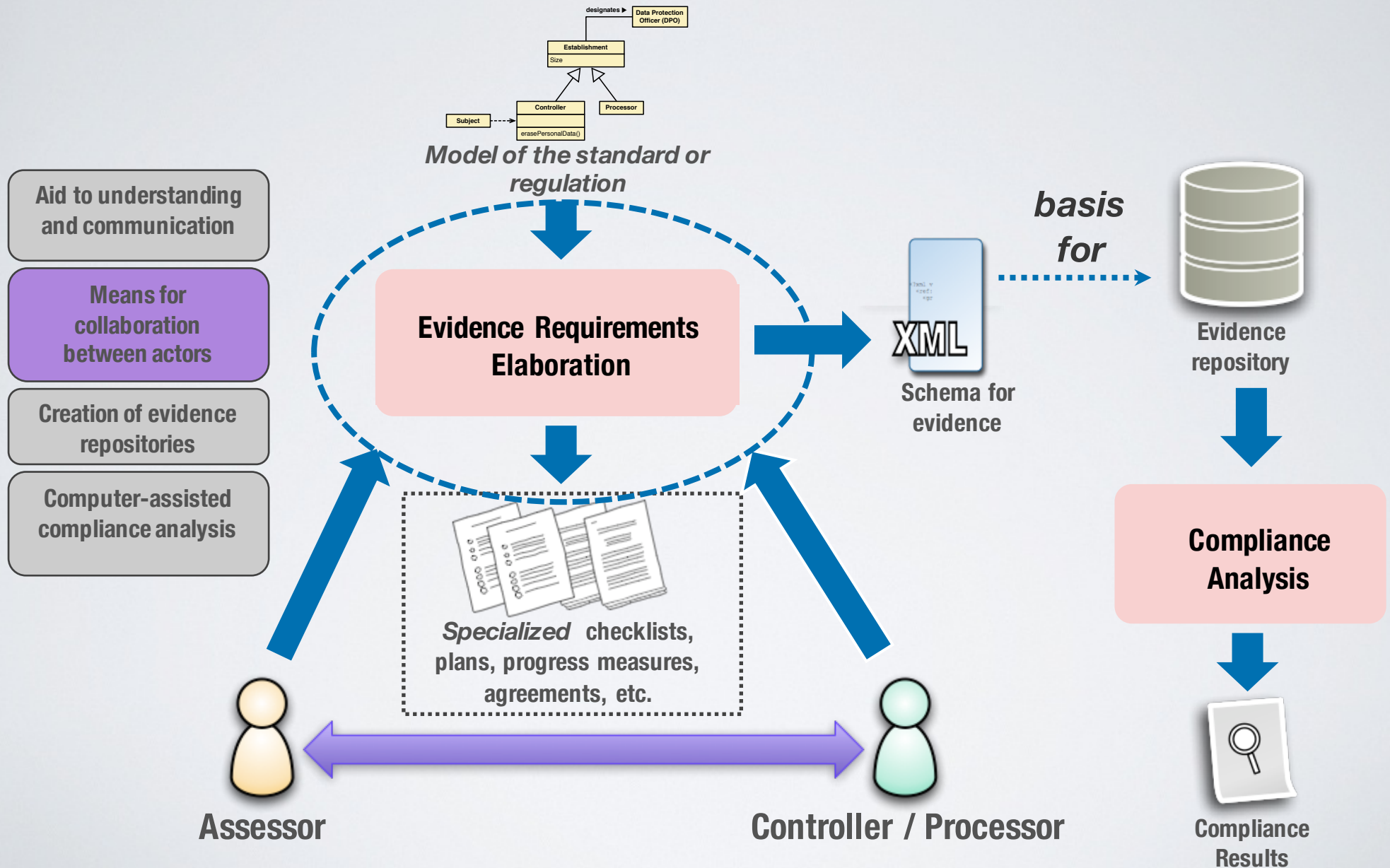
Constraint: Under certain circumstances, an establishment is obligated to designate a DPO



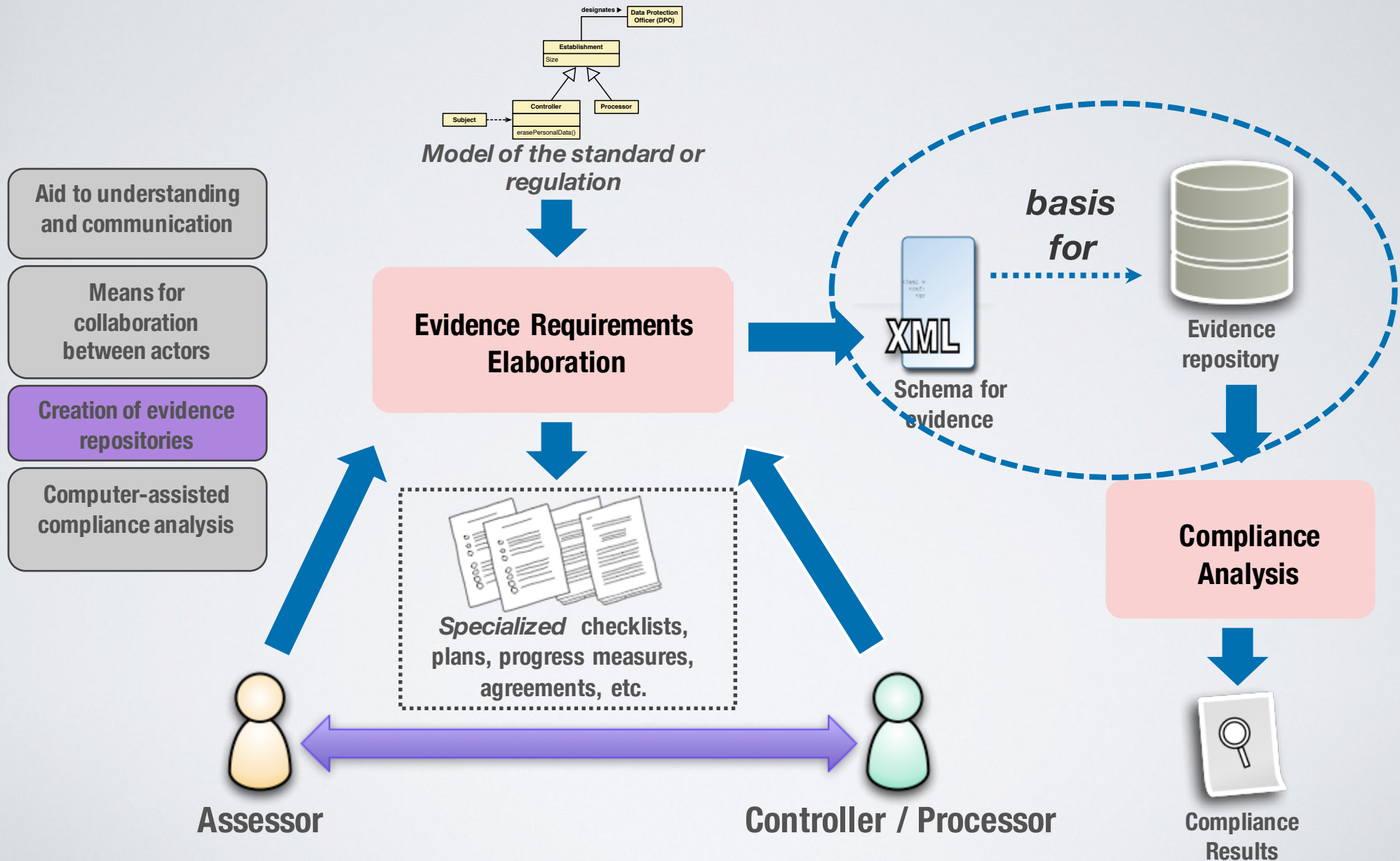
Learning from the Safety Critical Domain



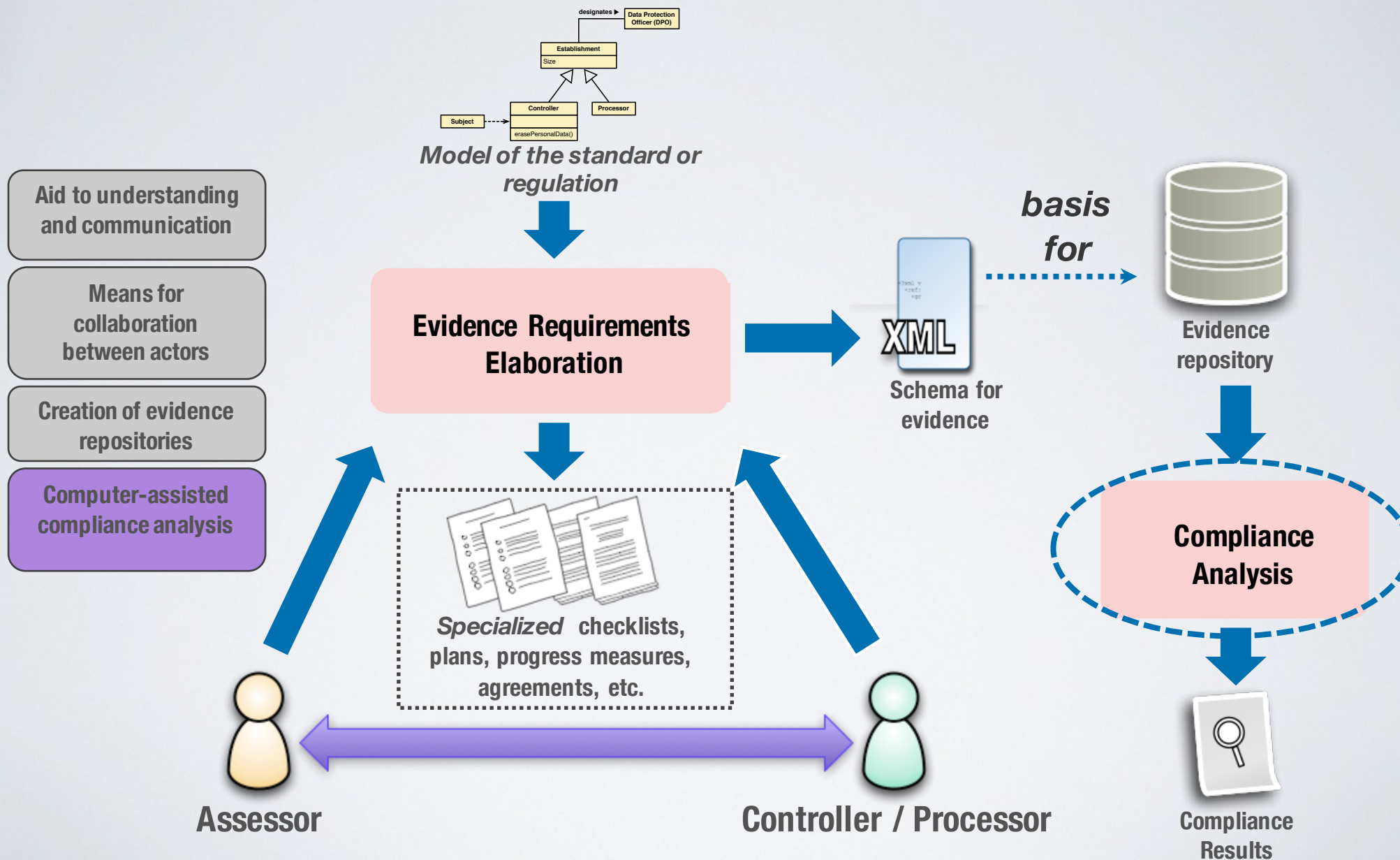
Learning from the Safety Critical Domain



Learning from the Safety Critical Domain



Learning from the Safety Critical Domain



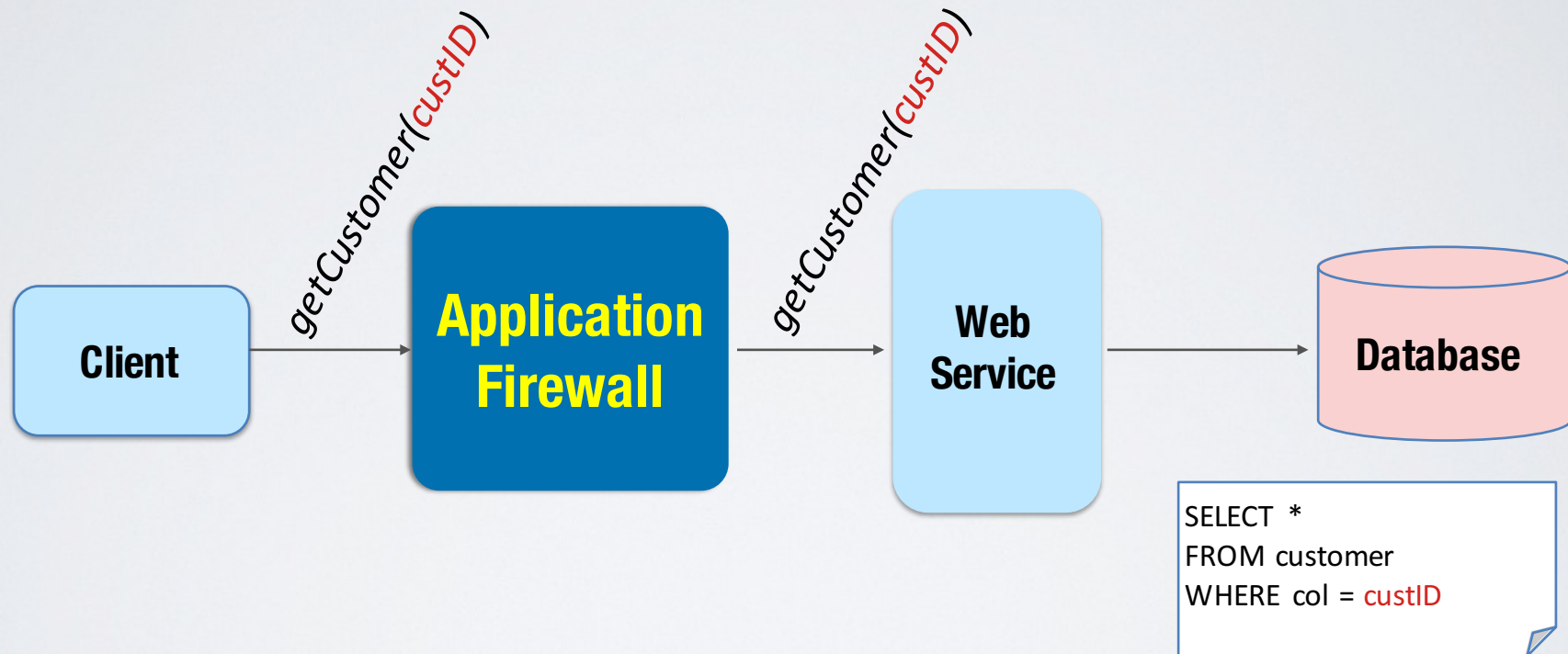
Penetration Testing

Penetration Testing

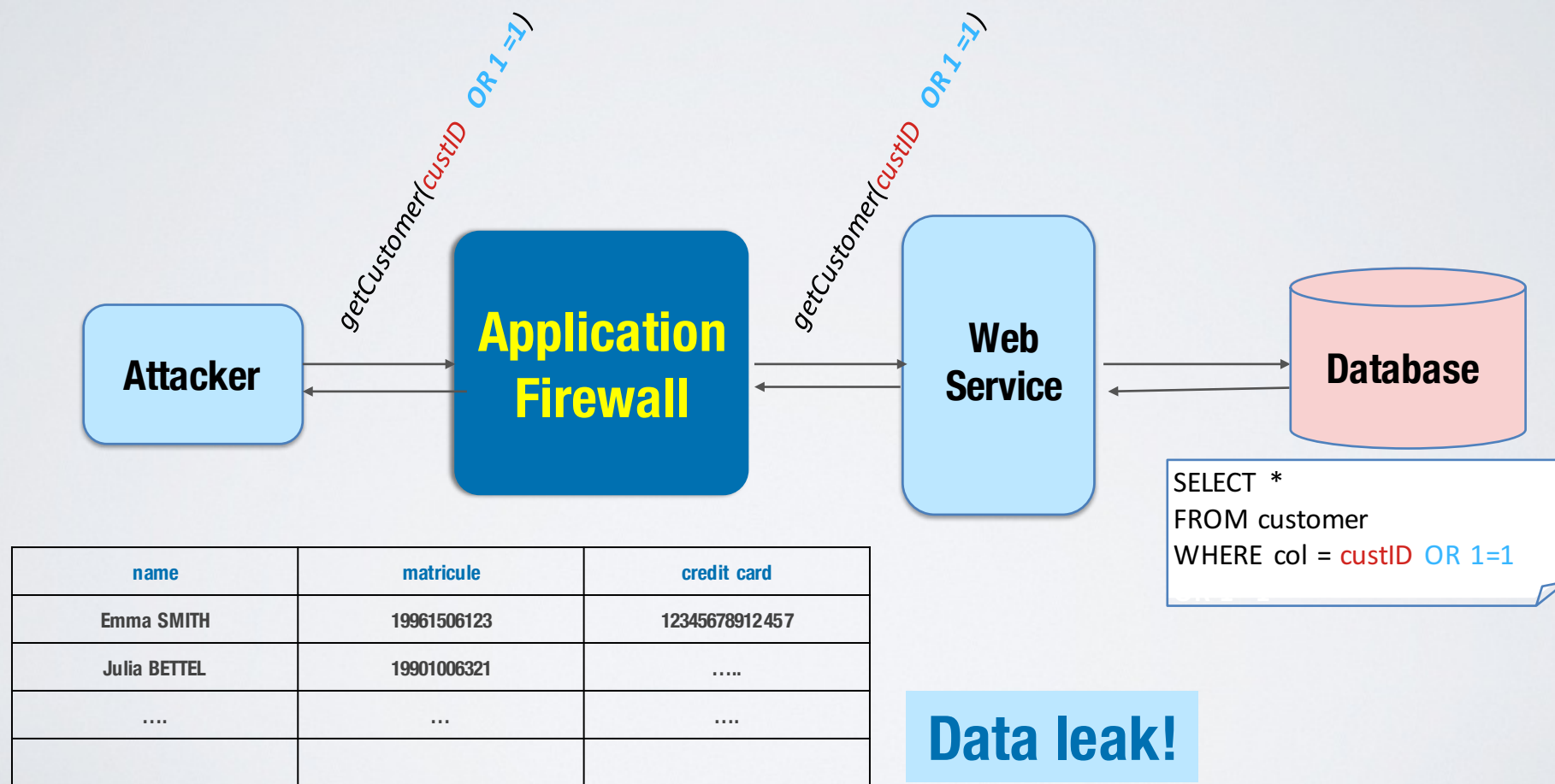
- A penetration test is an **attack** on a system to find **vulnerabilities** that an attacker could **exploit**
- The intention is to find security weaknesses, leading to **illegal access to functionality and data.**



Penetration Testing: SQL Injection



Penetration Testing: SQL Injection

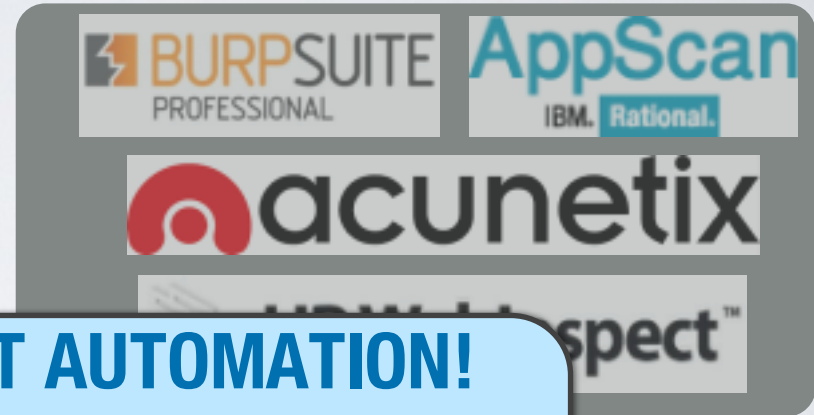


State of the Practice



Security
Con

+

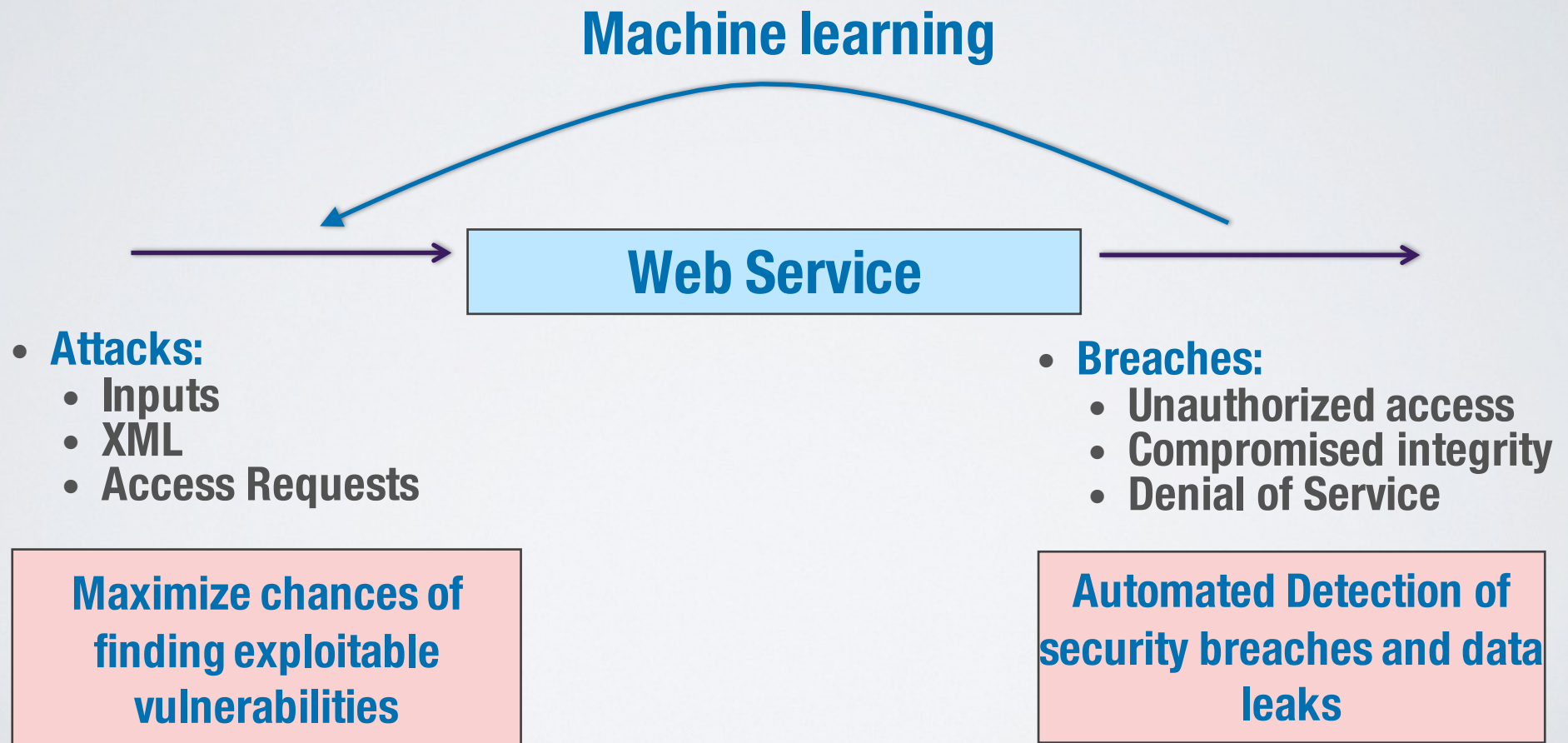


WE NEED BETTER TEST AUTOMATION!

**Solution: Automated testing based on
machine learning and optimization**

- Effort-in
- Effectiveness depends on the competence of the consultants
- Tools: Many false alarms and missed vulnerabilities
- Does not scale

Automated Penetration Testing



Protocol Verification

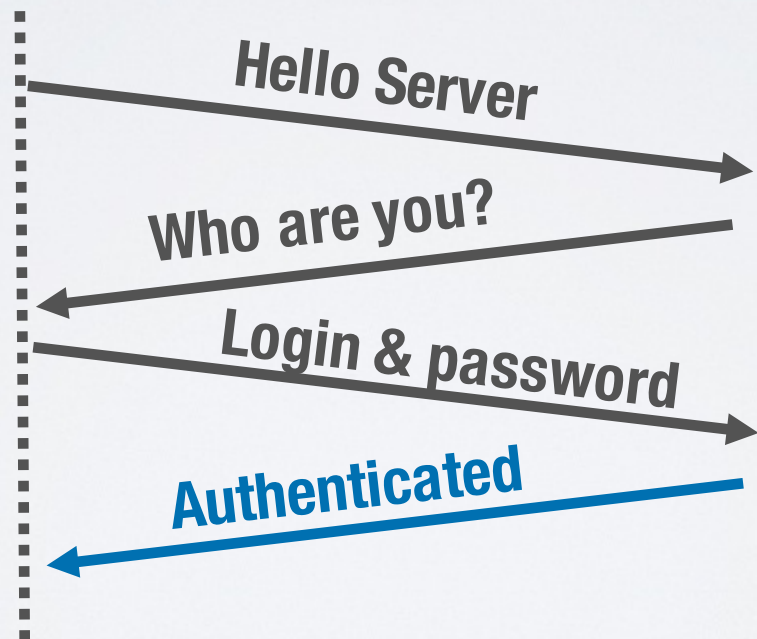
Protocols

Example: Password Authentication Protocol (PAP)

Client



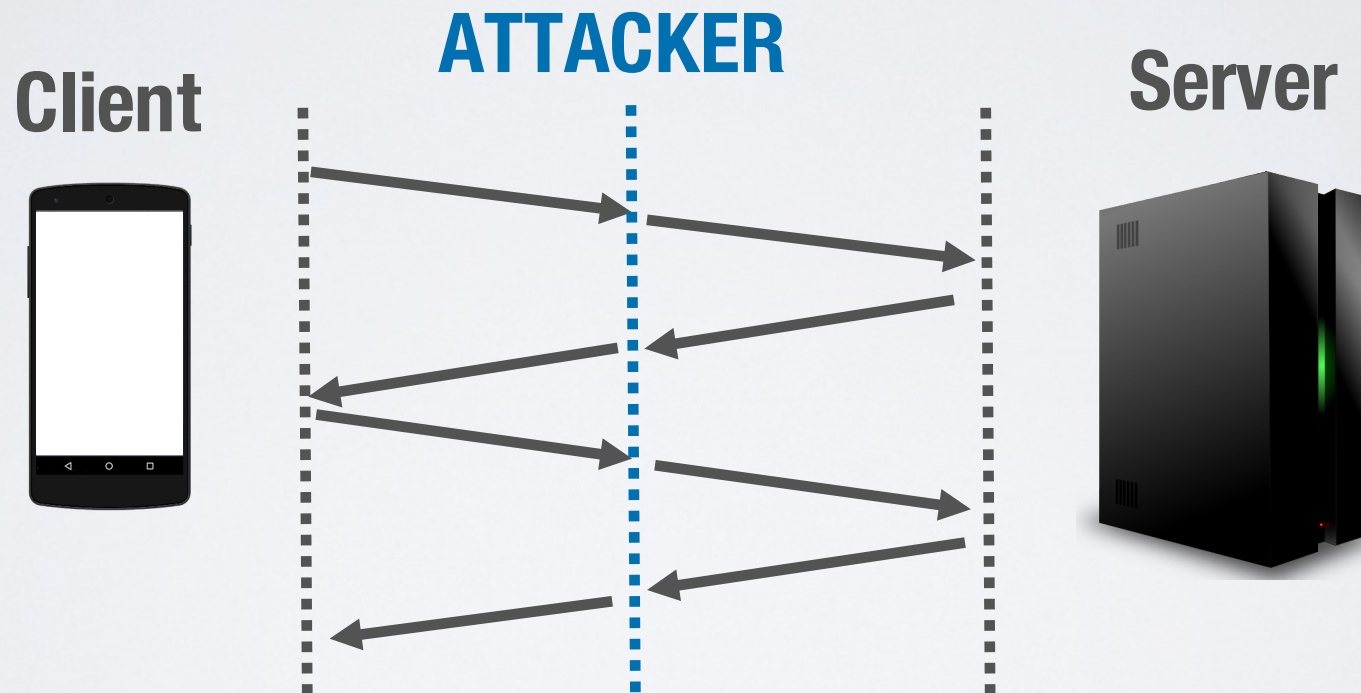
Server



Security Property: the server authenticates only the right client

Protocols

Example: Password Authentication Protocol (PAP)



Security Property Violation: the server authenticates the attacker

Modeling and Verification

Model

```

sequenceDiagram
    participant S as SP
    participant C as C
    participant U as UI
    participant I as IDP
    participant A as AuthN_C
    participant R as Resource

    Note over S,C,U,I,A,R: Actor ch_CSP : SP = httpRequest(get_ep_uri(UI), nil_req_header, nil_body);
    S->>C: SP ->C: httpresponse(code_30x,ep_agent(IDP),Abaq,nil_body);
    Note over S,C,U,I,A,R: Actor ch_CSP : IDP = httpRequest(get_ep_agent(IDP),Abaq,nil_body);
    S->>U: userlogin;
    Note over S,C,U,I,A,R: IDP ->C: httpresponse(code_200,nil_ep_nil_res_header,Authnform(AmySP,Wsp));
    S->>A: AmySP : httprequest(post_ep_agent(AmySP),nil_req_header,AmySP);
    Note over S,C,U,I,A,R: AmySP ->C: httpresponse(code_200,nil_ep_nil_res_header,Resource);

}

entity IDP() {
    -
}

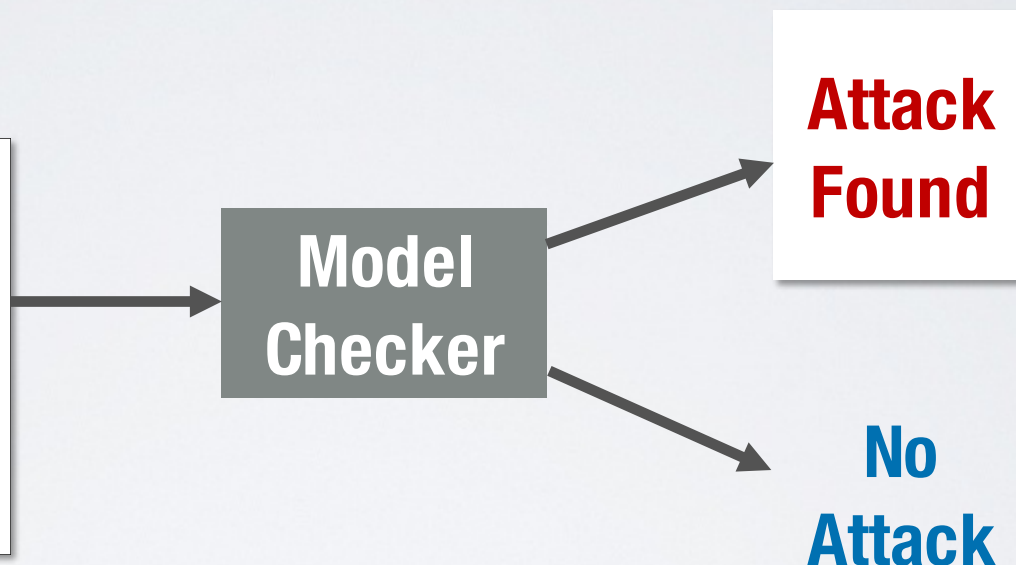
entity SP() {
    body
        ch_CSP : Actor = httpRequest(get_ep_uri(UI), nil_req_header, nil_body);
        ID := fresh();
        Actor ch_SP2C : C = httpresponse(code_30x,ep_agent(IDP),httpbinding(authrequest(Actor,IDP,ID),UI),nil_body);
        ch_C2SP : Actor = httprequest(post_ep_agent(Actor),nil_req_header,postbinding(signedauthresponse(inv(pk(IDP),nil_Agent_IDP,C,ID),UI)));
        Resource := fresh();
        Actor ch_SP2C : C = httpresponse(code_200,nil_ep_nil_res_header,Resource);
        SP_authN_C_on_uri(UI) := URI;
    }
}

goals
    SP_authN_C_on_uri(C) <-> SP;

body
    new Session(ch_C2SP_s1,ch_SP2C_s1,ch_ID2C_s1,ch_C2ID_s1,u1,c,s,p,idp);
    new Session(ch_C2I_s2,ch_I2C_s2,ch_ID2C_s2,ch_C2ID_s2,u1,c,i,idp);
end

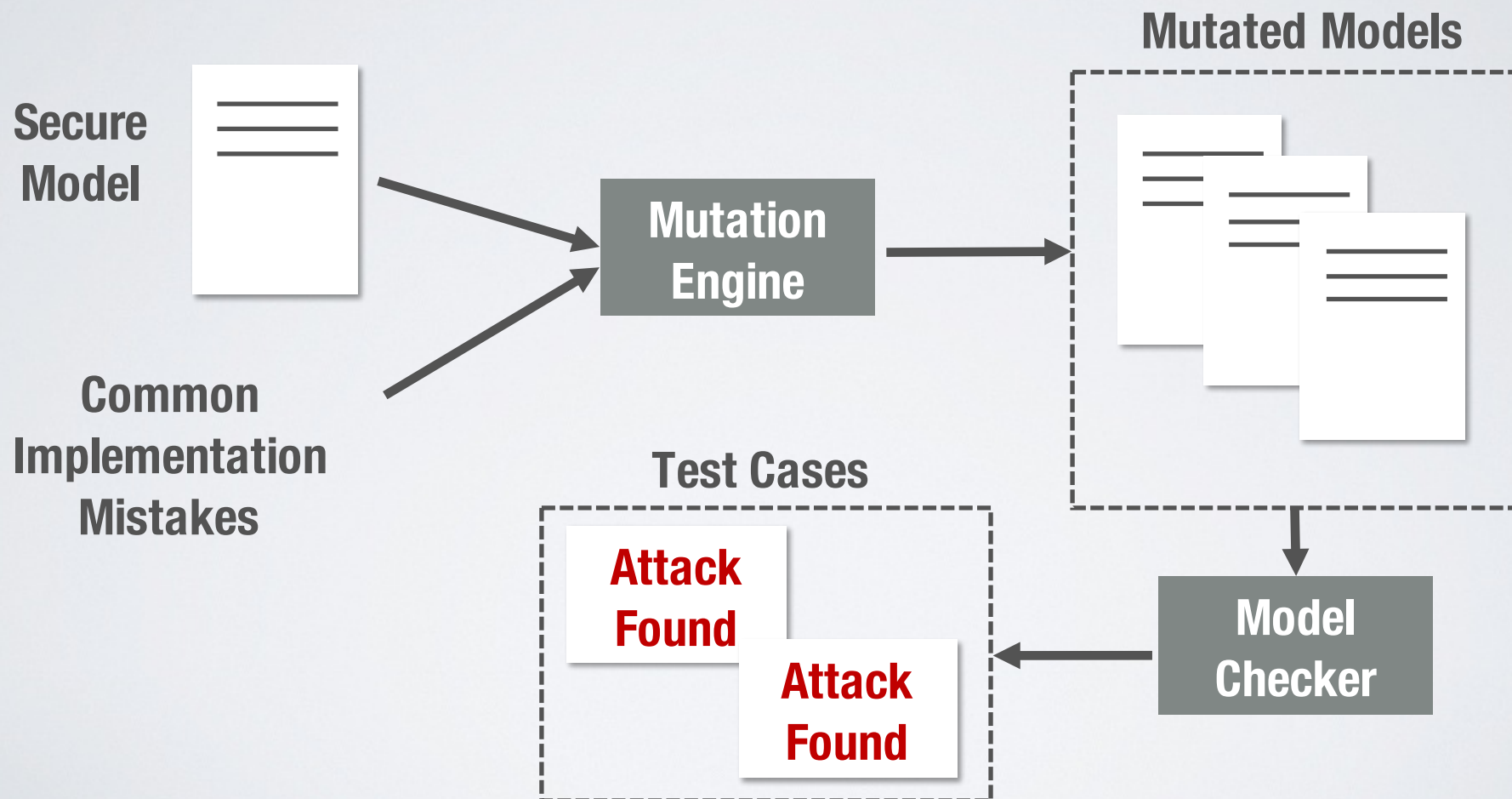
```

HTTP messages and security properties



The model checker is used to identify logical flaws in the protocol design

Testing the Protocol Implementation



Automated Compliance Analysis

Run-time Verification

**“A technique that verifies,
after the system is put in **operation and is
executing**, the behavior observed in the
system with respect to **given properties**”**

Example property I

Message order and response time: “After every successful completion of a payment, if the payer does not cancel it **within 60 seconds**, the recipient will receive a confirmation message **after at least 70 seconds** but **not later than 120 seconds**”

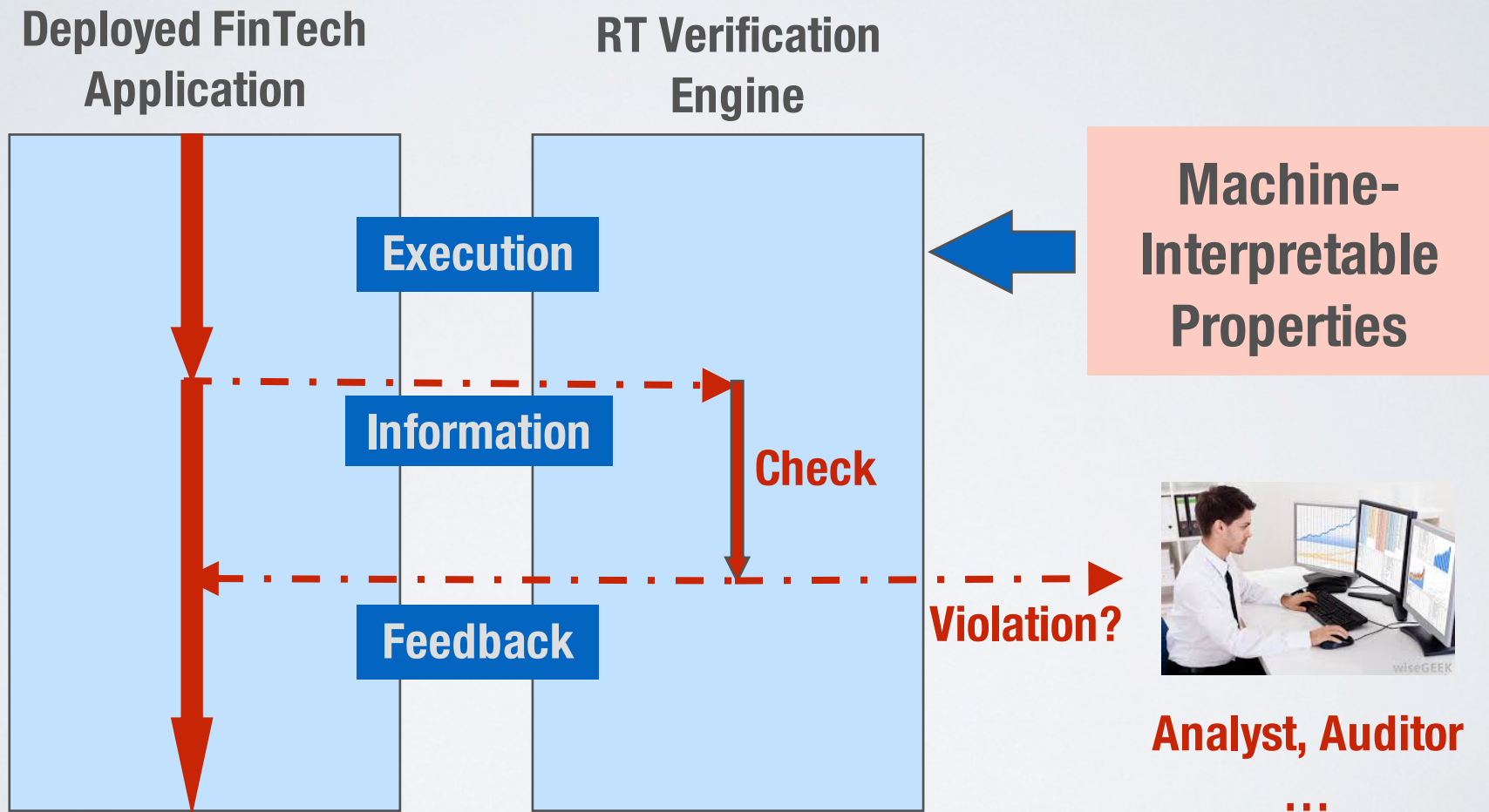
Example property II

- **Access control:** “An employee with the **role ‘junior financial analyst’** can access the ‘Derivatives Trading’ application only upon **delegation** from an employee with role **‘specialist financial analyst’** and within two hours from the delegation”

Category of Properties

- **Regulatory business rules**
- **Access control and data privacy**
- **Provisions from standards and best practices**
- **Service-level agreements**

Automation



Solutions

```
 $\phi ::= \chi \mid \neg\phi \mid \phi \wedge \phi \mid ((\text{forall} \mid \text{exists}) \text{id in var}; \phi) \mid \text{Becomes}(\chi) \mid$   
 $\text{Until}(\phi, \phi) \mid \text{Between}(\phi, \phi, K) \mid \text{Within}(\phi, K) \mid \text{InFuture}(\phi, K)$   
 $\chi ::= \psi \text{ relop } \psi \mid \neg\chi \mid \chi \wedge \chi \mid \text{onEvent}(\mu)$   
 $\psi ::= \text{var} \mid \psi \text{ arop } \psi \mid \text{const} \mid \text{past}(\psi, \text{onEvent}(\mu), n) \mid \text{count}(\chi, K) \mid$   
 $\text{count}(\chi, \text{onEvent}(\mu), K) \mid \text{fun}(\psi, K) \mid \text{fun}(\psi, \text{onEvent}(\mu), K) \mid \text{elapsed}(\text{onEvent}(\mu))$   
 $\text{relop} ::= < \mid \leq \mid = \mid \geq \mid >$   
 $\text{arop} ::= + \mid - \mid \times \mid \div$   
 $\text{fun} ::= \text{sum} \mid \text{avg} \mid \text{min} \mid \text{max} \mid \dots$ 
```



**Language to express
properties**

**Algorithm to
check them
based on data**

**Run-time
Architecture to
collect data**

Security Audits

Security Audits: Definition

Source code analysis to identify, locate, and fix potential security & privacy issues

The background of the slide is a blurred image of code snippets. Visible text includes 'getConnection()', 'statement.execute()', and 'set.next()'.

**Manual auditing is
infeasible!**

Commercial Tools



- Many false alarms
- Miss some vulnerabilities
- Overhead for security audit teams

Vulnerability Verification

Code



Program
analysis

Security Slice



Symbolic
execution

Condition



Constraint
solving

Feasible?

no



yes



Few false
alarms

Vulnerability Prediction

Code



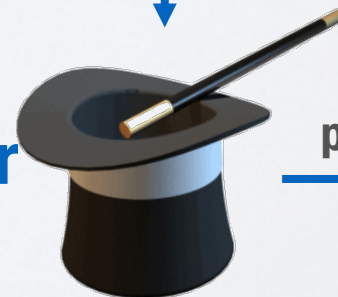
Program analysis

Code characteristics



Machine learning

Vulnerability predictor

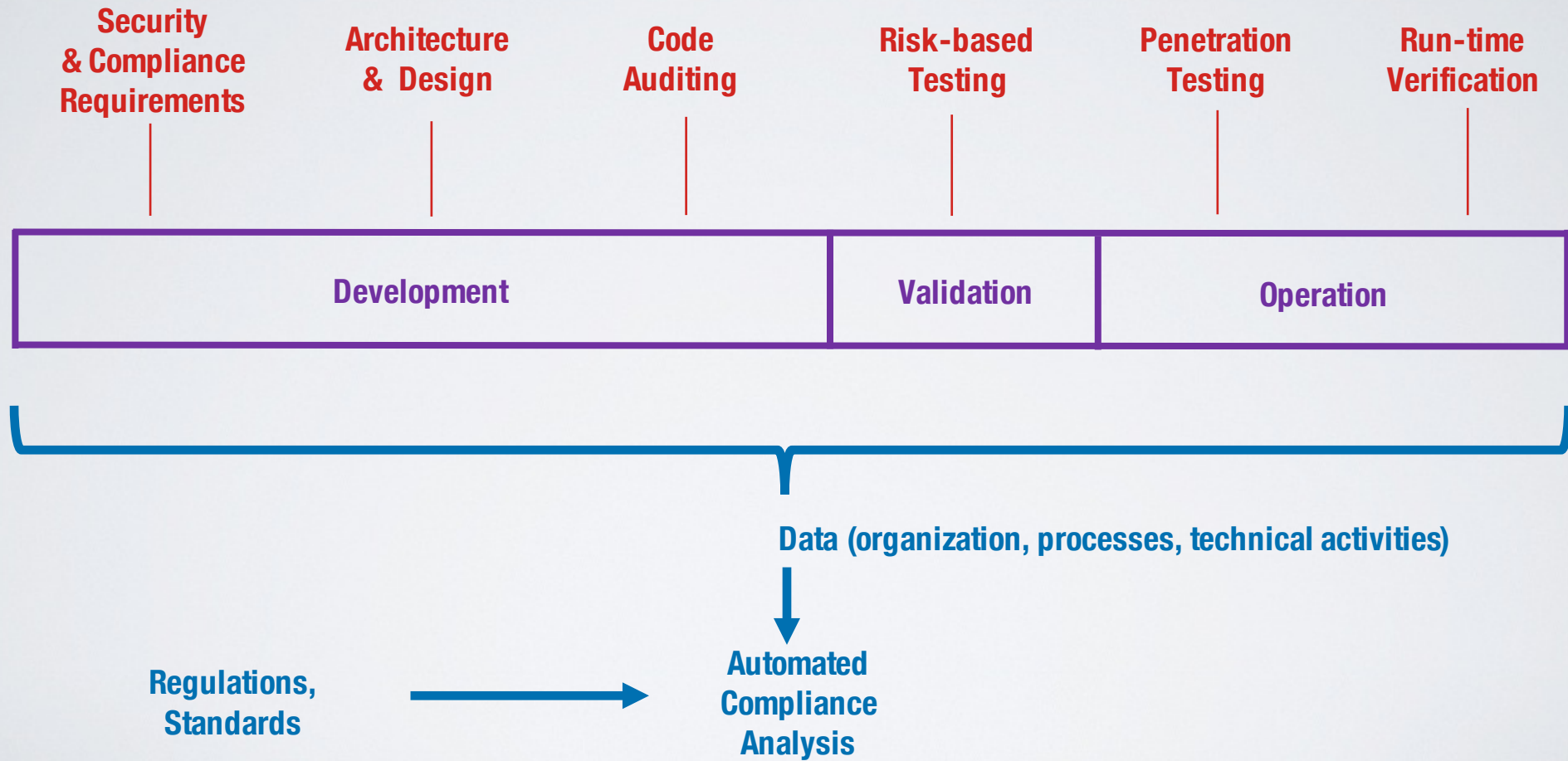


predicts



How does one get sufficient assurance about security data management and compliance with regulations?

Overall Solution



Additional Contacts

- **Mike Sabetzadeh, Ph.D.:** Regulatory compliance, security requirements
- **Domenico Bianculli, Ph.D.:** Source code auditing, run-time monitoring and verification
- **Annibale Panichella, Ph.D.:** Automated security testing
- **Karl Johannessson:** Project partnerships

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