

# Is your Car Dealership in compliance with the recently released Federal Trade Commission Safeguards Updates?



Review the series of questions to assess your compliance with the new **FTC Safeguards Rules:**



Have we developed a plan to keep customer information safe, and have we designated one or more employees to coordinate the plan?



Are we implementing physical safeguards to keep customer information safe, such as securely storing paper files and computer equipment and limiting physical access to areas where customer information is stored?



Are we implementing technical safeguards to keep customer information safe, such as using antivirus software, firewalls, and encryption, and limiting employee access to customer information on a need-to-know basis?



Have we established employee training programs to teach our team how to keep customer information safe, including ongoing training on the importance of safeguarding customer information and our dealership's information security policies and procedures?



Are we implementing vendor management programs to identify and evaluate the risks associated with sharing customer information with vendors, only sharing customer information with vendors that have policies and procedures in place to protect it, and contractually requiring vendors to comply with our dealership's information security policies and procedures?



Have we established incident response plans to respond to incidents involving the unauthorized access or loss of customer information, including assigning specific roles and responsibilities to employees and training them on how to recognize and respond to incidents?



Are we conducting regular risk assessments to identify internal and external risks to customer information, reviewing and updating our plan to keep customer information safe based on the results of the risk assessment, and documenting the risk assessment and the changes made to our plan?



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