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Geolocation Process supports HR, Legal, IT, Security and Procurement Objectives



Susanne Senoff, Chief Information Security Officer, PROS

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About PROS

PROS helps companies outperform with an AI-powered, real-time platform that optimizes both B2B and B2C omnichannel commerce.

- Real-Time Pricing Engine
- Personalized, Market-Relevant Offers
- Configure, Price and Quote



4.1T

Transactions Processed
Trailing 12 Months



7.7M

Transactions Per Minute



99.97%

Platform Uptime



70+

Countries with Customers

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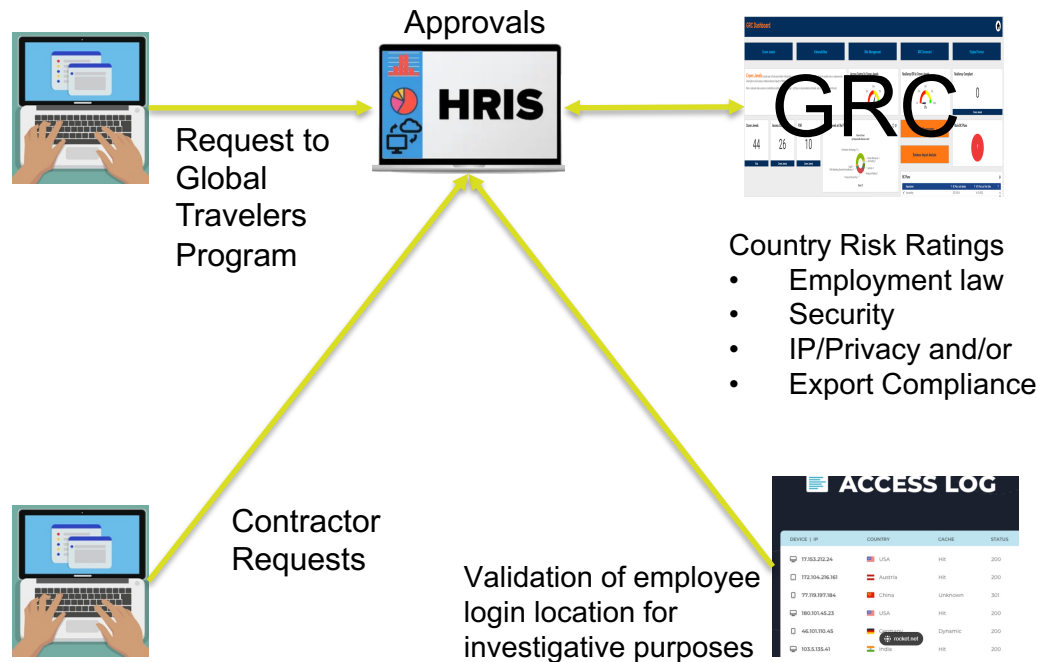
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Business Need

- **PROS Global Travelers Program** allows employees to work from *almost* anywhere worldwide for up to 90 days in a rolling 12-month period with People Team approval.
 - Although a program with defined parameters and criteria was in place, **approvals for Security and Legal were documented separately**, indicating a disconnect in the process.
 - The People Team and Security were **working independently to implement conditional access** with restrictions for high-risk countries.
 - **Procurement was not engaged with Security** for contractors or companies.

Geolocation Process



What does Success look like?

- Assured adherence to tax law
- Investigations and discipline into employees violating program
- Ease of use and consistency for employees
- Conditional access for critical and high-risk countries
- Travelers receive security awareness tips before leaving.
- Travelers don't take company equipment where they shouldn't.
- Contractors are vetted for geolocation before joining.
- Used for other purposes, including defining new entities.

Country Risk Ratings

The Overall Risk is determined by the highest risk rating for Security, Privacy, Employment, Regulatory (Export Compliance or IP) risks.

Country: Indonesia | Region: ASIA (EX. NEAR EAST) | Overall Risk Rating: High Risk

Navigation: About | Restrictions | Risk Ratings | Requests and Exceptions | Customers and Vendors | Procedures

Risk Ratings

Security Risk: Medium Risk | Privacy Risk: Low Risk | Export Compliance Risk: Low Risk | Regulatory Risk IP Laws: Low Risk | Regulatory Risk Employment Laws: High Risk

GCI Security Risk Factor: 95

Top Ten Attacker Source: Yes

Additional Guidance

SECURITY: Indonesia is a Medium Security Risk with a very high GCI score (95). It is only ranked Medium instead of Low because it is included in the Top Ten Attacker list of countries from which cyber attacks are launched. It has a High Risk rating because of the employment laws in Indonesia, so approval will be required from HR.

PRIVACY: Indonesia has adopted an overarching framework for personal data protection through the enactment of Law No. 27 of 2022 concerning Personal Data Protection ("PDP Law") since 17 October 2022. Data controllers, data processors and relevant parties that process personal data are given a two (2) year transition period following the enactment of the PDP Law, thus up to 17

Here are some helpful links when researching countries.

PRIVACY
[CNIL Reference Map](#)
[DLA Piper Data Protection Reference Map](#)
[Export Control Info](#)

Rating	Security Criteria	Employment Law	Privacy, IP, and Export Compliance
Critical	Country Group E file (doc.gov)	Based upon tax implications, restrictiveness of employment laws, and consequences	Determined by Legal based upon amount of restrictions for doing business in the countries and degree to which the country would own IP
High	Country Groups D-1 and D-5		
Medium	Cybersecurity Global Index https://www.itu.int/en/ITU-D/Cybersecurity/Pages/global-cybersecurity-index.aspx which measures the commitment of countries to cybersecurity at a global level. 85 or lower		
Low	86+		

Exception Process

Approvals are required by the relevant department depending upon what factor drives the risk rating, e.g. Security rates High, follow security approval matrix.

Risk Rating	Security	Employment	Legal (IP, Export Compliance, Privacy)	Business
Critical	Assumed denial; CISO and potentially CFO agreement required	HR Director	Deputy GC	SVP or above
High	CISO	HR Director	Deputy GC	VP or above
Medium	Security Director	HR Director	Deputy GC	Director
Low	No approval	No approval	No approval	No approval

Request, justification and approval are tracked in GRC system and by HR as a policy exception request. Exceptions can only be approved for one year and must be reviewed and re-approved at least annually. Each case is considered individually.

Key Takeaways and Lessons Learned

- **Don't boil the ocean – Start.**
 - Set up the process and start. You can add data as it is needed.
 - ChatGPT can provide initial responses for exceptions and for user awareness tips.
- **Be consistent.**
 - Established criteria is important, particularly for monitoring.
- **Perfection is not the goal.**
 - Establish a framework that identifies where we need to investigate more closely to ensure that risk is owned at the appropriate level is.

Recognition

- **Susanne Senoff** – Security, CISO
- **Christine Lambden** – Security, Privacy
- **Natasha Taylor** – People Team
- **Kristen Cook** – People Team
- **Nikki Brewer** – People Team, Chief People Officer
- **Mujeeb Nazeer** – IT
- **Jennifer Zuber-Garrison** – Procurement
- **Dewayne Walker** – Procurement
- **Tara Callanan** – Legal
- **Damian Olthoff** – Legal, General Counsel

THANK YOU

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