

FTC Actions Highlight Focus On Cos.' Cybersecurity Efficacy

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On Dec. 14, the Federal Trade Commission hosted an open meeting featuring a staff presentation on cybersecurity.

Alex Gaynor, the FTC's deputy chief technology officer, discussed the implications of the FTC's approach to data security enforcement over the past year, specifically highlighting four security best practices.

He noted that the FTC's latest orders signaled an important new focus on addressing flaws in the nuts and bolts of companies' cyber programs that leave user and employee data vulnerable in an increasingly digital economy.

The presentation gives important context by reviewing the FTC's enforcement actions over the course of 2022 and in light of broader federal government trendlines as stipulated in President Joe Biden's Executive Order No. 14028 on improving the nation's cybersecurity.

This review indicates the FTC is exerting heightened focus on assessing certain technical security safeguards, the absence of which can create exploitable gaps that undermine appropriate management of data.

The FTC's emphasis on certain core technical measures is instructive for all companies, regardless of size or industry, in order to minimize cyber risk and regulatory scrutiny.

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Gibson Dunn lawyers are available to assist in addressing any questions you may have about these developments. Please contact the Gibson Dunn lawyer with whom you usually work, the authors, or any member of the firm's Privacy, Cybersecurity & Data Innovation practice group:

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