

**KY3P®**

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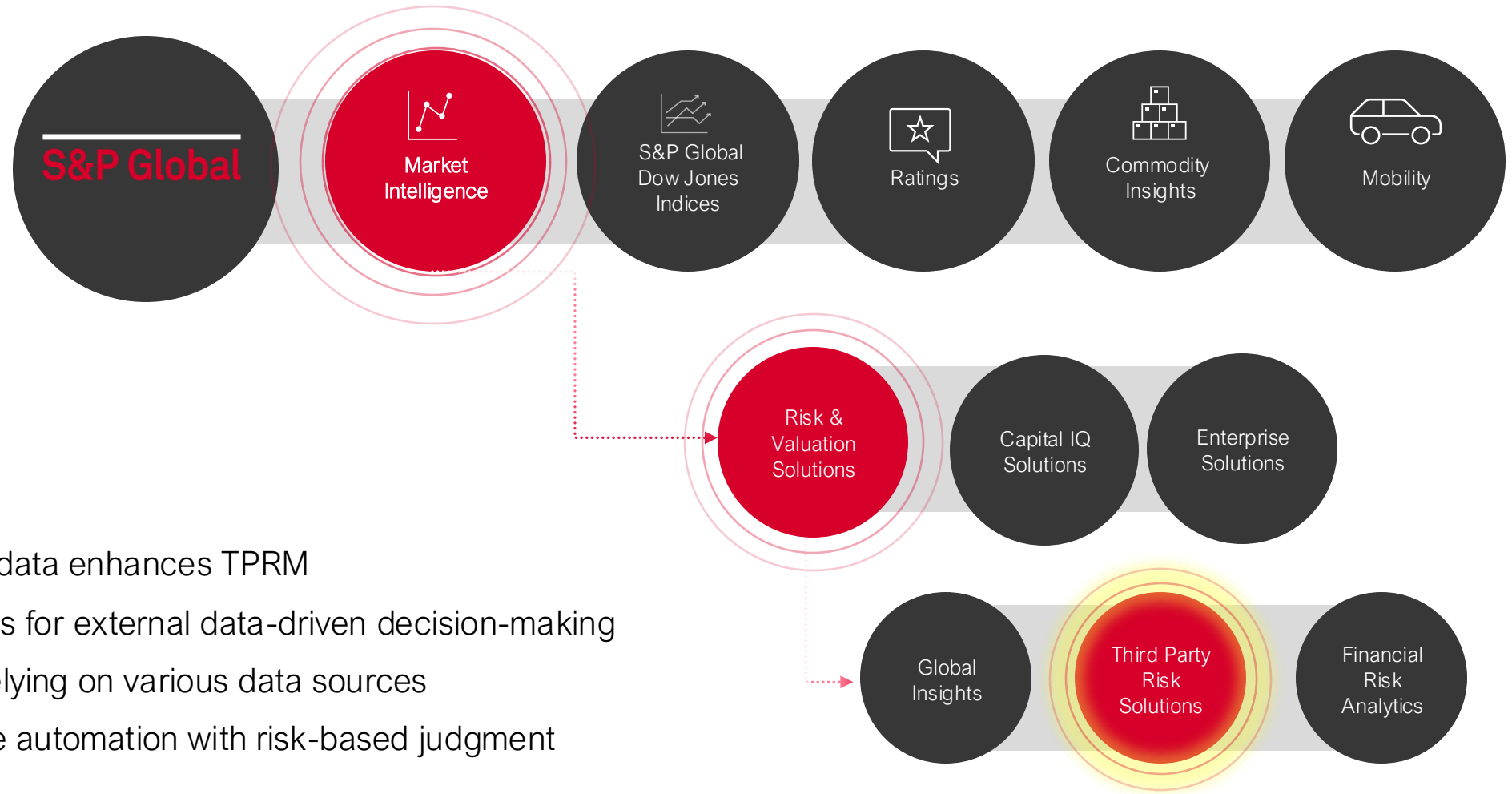
**S&P Global**

# Leveraging External Data for Compliant Third-Party Risk Management

March 2025

# S&P Global | Introduction and Objectives

*The growing complexity of third-party risk*

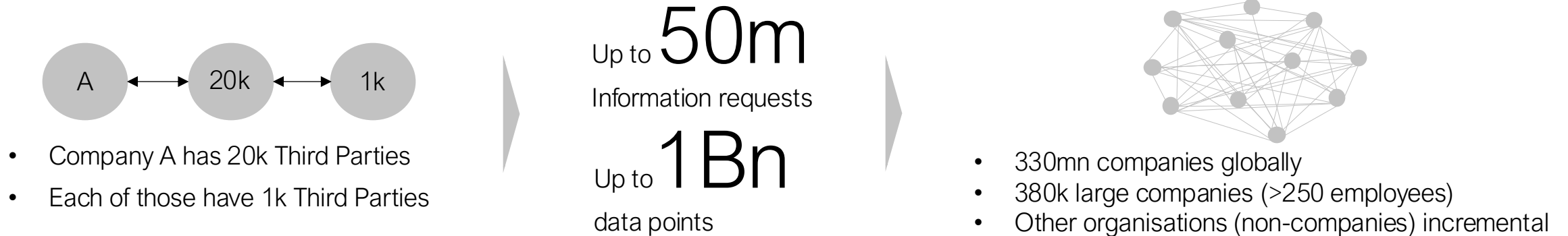


- Understand how big data enhances TPRM
- Explore best practices for external data-driven decision-making
- Identify key risks in relying on various data sources
- Learn how to balance automation with risk-based judgment

# S&P Global | The Challenge of Third-Party Risk Today

*Current approach to Third Party Risk Management is becoming unsustainable*

Sole reliance on bilateral data exchange becomes untenable as scale and scope increases



An inefficient model which struggles to deliver the required outcomes



- ✗ Lack of visibility of risk, risk of non-compliance
- ✗ Unable to provide quality answers to basic stakeholder questions e.g. Boards/regulators
- ✗ Resource intensive focus on data collection
- ✗ Difficult to report and derive insight
- ✗ Suppliers are overwhelmed and pushing back
- ✗ Admin heavy - inability to attract / retain talent

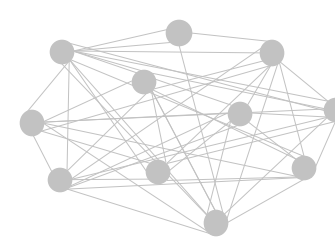
# S&P Global | What is Big Data in Third-Party Risk

*Big data in TPRM includes structured and unstructured sources*

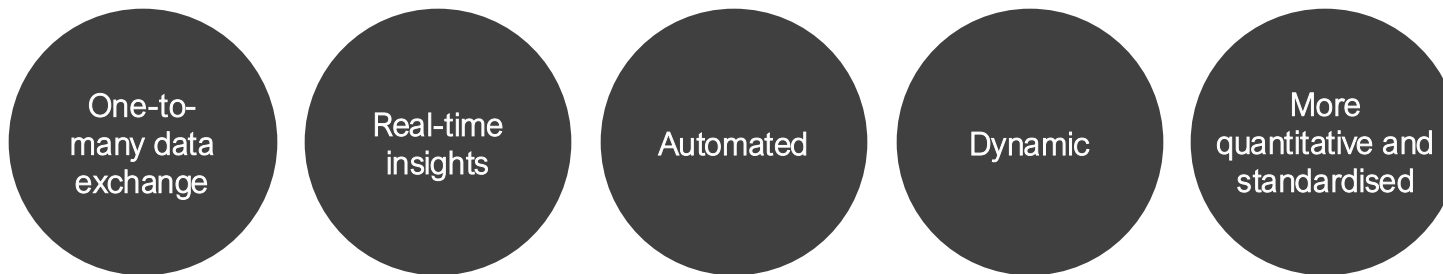
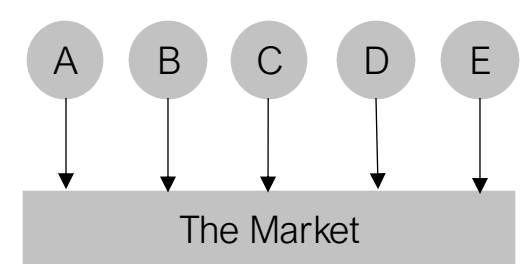
In the coming years, many facets of Third-Party Risk Management will pivot towards reliance on data, rules, and AI. Advancing technology and enhanced information quality will propel this transformation.

- **Internal:** Assessments, contract history, audit results
- **External Domain Specific:** Cybersecurity ratings, financial stability, ESG scores, negative news
- **External Broad Sourcing:** Location Risk, Macro-economic scenario modeling, cross-domain analytics.
- **Regulatory & Market:** Sanctions lists, compliance breaches

Risk data exchanged bi-laterally between companies



Company risk data available centrally as a one to many



- ✓ Enables clear reporting and insight and drives risk decision making
- ✓ Third parties are engaged and incentivised to contribute
- ✓ Resources focussed on response and mitigation
- ✓ Clarity to stakeholders e.g. Boards/regulators

# S&P Global | Big Data Insights

## *Supply Chain Risk*

Hold for S&P Global Research to be added before event

# S&P Global | How Big Data Enhances TPRM Programs

## Leveraging Data-Driven Insights for Smarter Risk Management



CYBER RISK  
INSTITUTE



Big data powers real-time risk monitoring, AI-driven assessments, and regulatory alignment, strengthening Resilience and general TPRM while optimizing supply chain oversight.

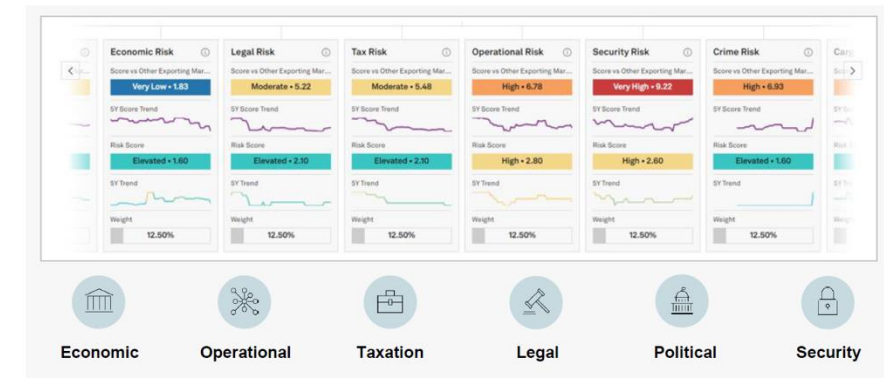
### Key Use Cases:

- ❖ **Private & Public Data Sharing & Benchmarking:** Leverage industry-wide insights to improve resilience and cyber risk assessments and enhance decision-making.
- ❖ **Vendor Profiling & Ratings:** Utilize external data for automated oversight, risk correlation, and third-party matching.
- ❖ **Automated Due Diligence & Monitoring:** Combine profile data with validated assessments to proactively identify risks and recommend mitigation strategies.
- ❖ **Streamlined TPRM Processes:** Optimize efficiency and cost-effectiveness, ensuring speed, quality, and a sharper competitive edge.
- ❖ **Supply Chain Optimization & Risk Management:** Enhance visibility across supplier networks, predict disruptions, and ensure business continuity.

### COUNTRY RISK AND ECONOMICS

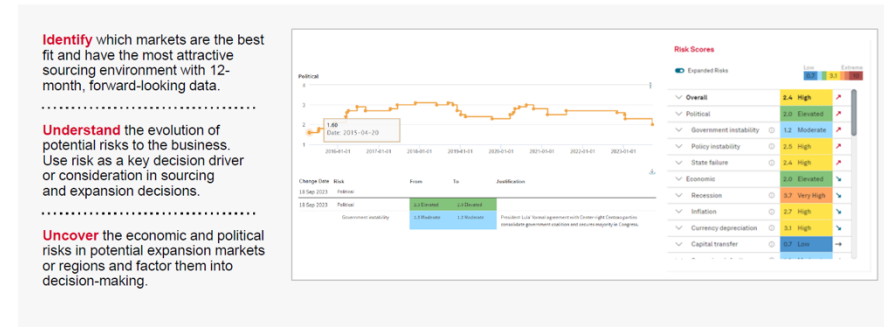
#### Country Risk Analytics

Robust methodology reveals the full global risk profile.



### COUNTRY RISK AND ECONOMICS

#### Country Risk Data





# S&P Global | Benefits of Big Data in TPRM

## *Leveraging Data-Driven Insights for Smarter Risk Management*

Big data enhances Third-Party Risk Management (TPRM) by improving risk visibility, accelerating decision-making, and optimizing compliance and cost efficiency.

### Key Benefits:

- ❖ **Improved Risk Visibility:** Real-time monitoring and alerts provide proactive risk identification.
- ❖ **Timely Decision-Making:** Automated risk scoring and AI-driven insights enable quicker, data-backed decisions.
- ❖ **Compliance & Audit Readiness:** Standardized, data-driven documentation ensures regulatory alignment and audit preparedness.
- ❖ **Cost Efficiency:** Reduces reliance on manual assessments, optimizing resources and lowering operational costs.
- ❖ **Supply Chain Resilience:** Predictive analytics help anticipate disruptions and strengthen third-party risk mitigation.



# S&P Global | Risk of Over-Reliance on External Data and Vendor Scores

*“Everybody wants scores, but nobody uses them”\**

While big data enhances Third-Party Risk Management (TPRM), overreliance on data and automated scoring can introduce challenges and risks that must be carefully managed.

## Key Risks:

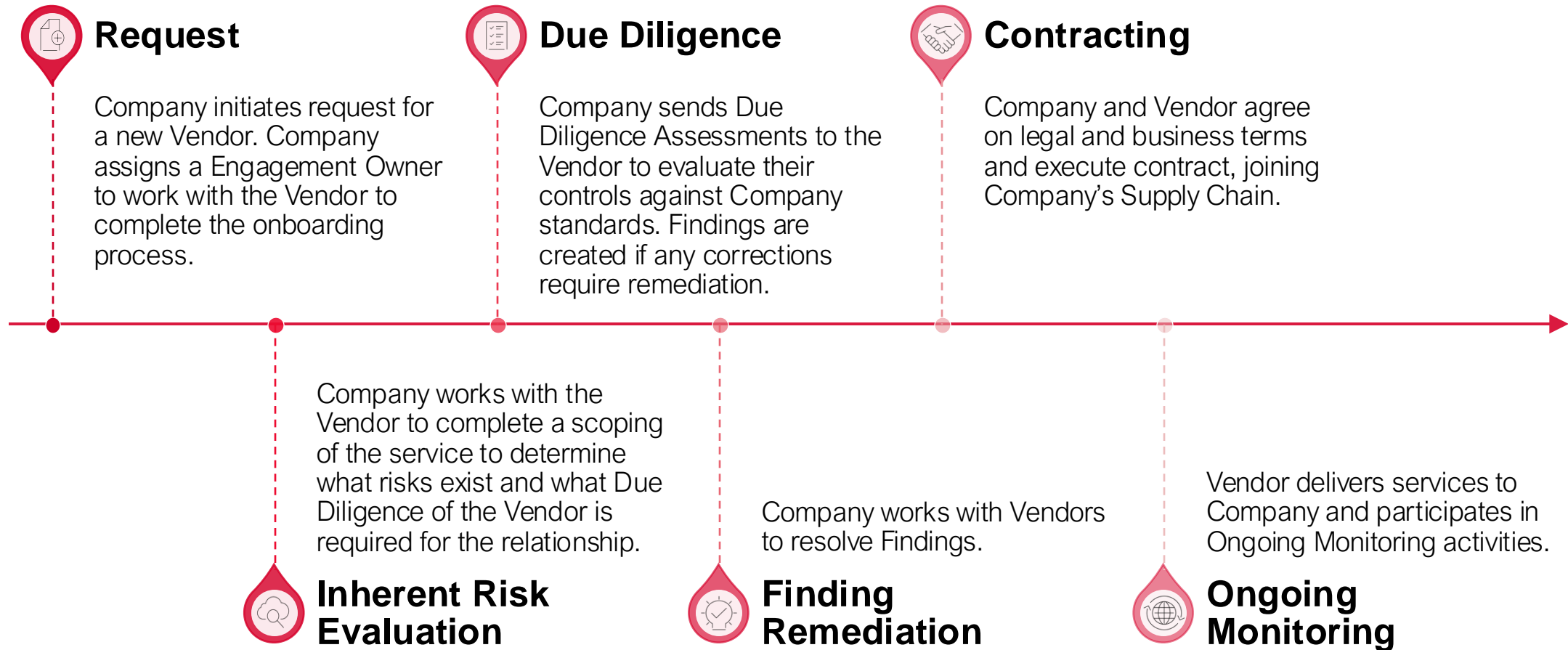
- ♦ **Data Quality Challenges:** Not all sources are equally reliable, and outdated or incomplete data can skew assessments.
- ♦ **Unclear Modeled vs. Validated Data:** Relying on vendor-provided data without recognizing it may be modeled (not independently validated) can introduce blind spots and misinformed risk decisions.
- ♦ **False Positives/Negatives:** Algorithmic risk scoring isn't always accurate, leading to misclassified risks.
- ♦ **Regulatory Misalignment:** Compliance expectations vary across jurisdictions, requiring tailored risk frameworks.
- ♦ **Risk Decision Trade-Offs:** Determining the right weight for each data source is critical to ensuring balanced, defensible decisions.





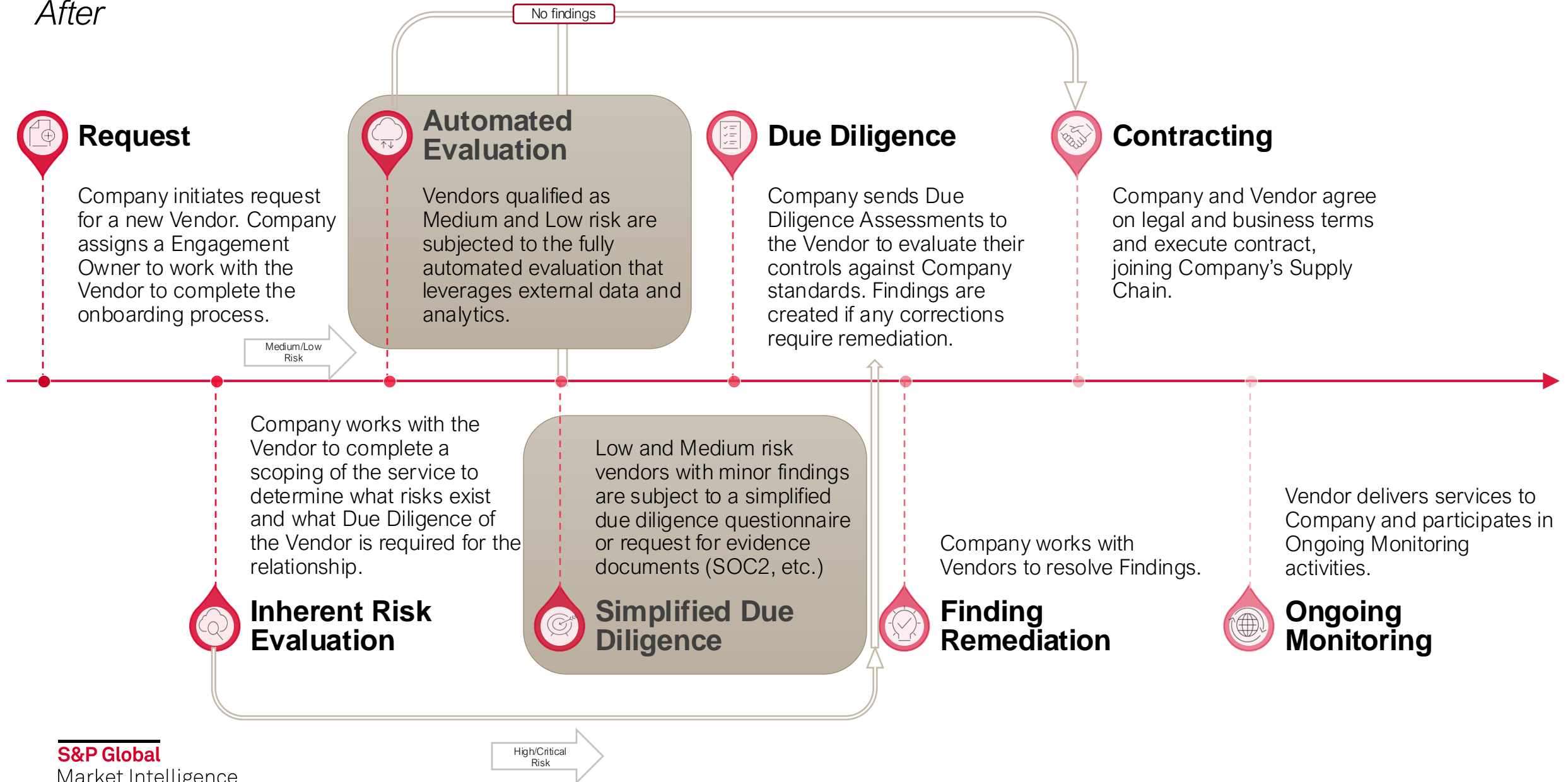
# S&P Global | Case Study – Data-Driven TPRM in Action

## Before




# S&P Global | Case Study – Data-Driven TPRM in Action


After





# Real-Life Applicability for External Data Usage

 *“We get the data, but how do we know when it’s enough to skip a full assessment?”*

 *“I trust continuous monitoring for alerts, but how do I turn that into a decision?”*

 *“I have a SOC 2, a DDQ, and a risk rating—but how do I justify that is enough to onboard this vendor.”*

 *“Leadership wants faster onboarding, but I don’t want to cut corners on due diligence.”*

 *“We’ve invested in external data, but it’s hard to show how it reduces our effort.”*

# S&P Global | Best Practices for Using External Data in your Assurance Program

Maximizing Data-Driven Insights for Effective Risk Management



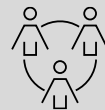
## Define data reliability levels

- Weigh internal vs. external sources (e.g., self-assessments vs. independent audits)



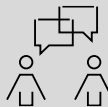
## Develop a Data Reliance Framework

- How much trust to place on each data type?



## Combine human judgment with AI-driven insights

- Automated scoring should inform, not replace, expert analysis



## Establish governance for risk-based decisions

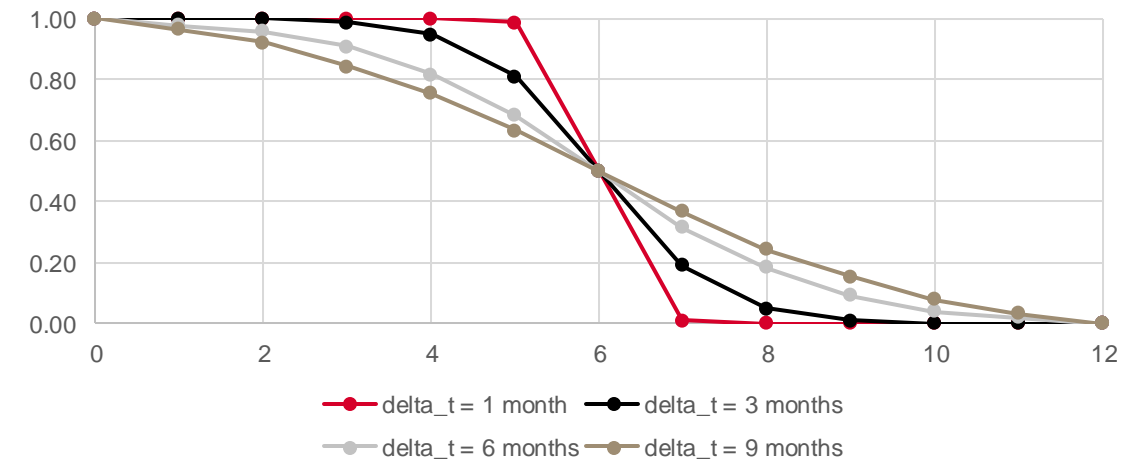
- Ensure transparency in risk calculations

**Score Adjustments:** Handling quality, conflicts, and timeliness of data

**Source Confidence:** Impact of 4th party data, positive vs. negative modifiers

**Scope Consistency:** Example: Aligning audit reports and network scans (Apples vs. Oranges)

Example: Assigning and scaling information value between  $[0, 1]$   $t = 0$  &  $t = \text{max}$  based on timeliness



# S&P Global | Best Practices for Using External Data in your Assurance Program

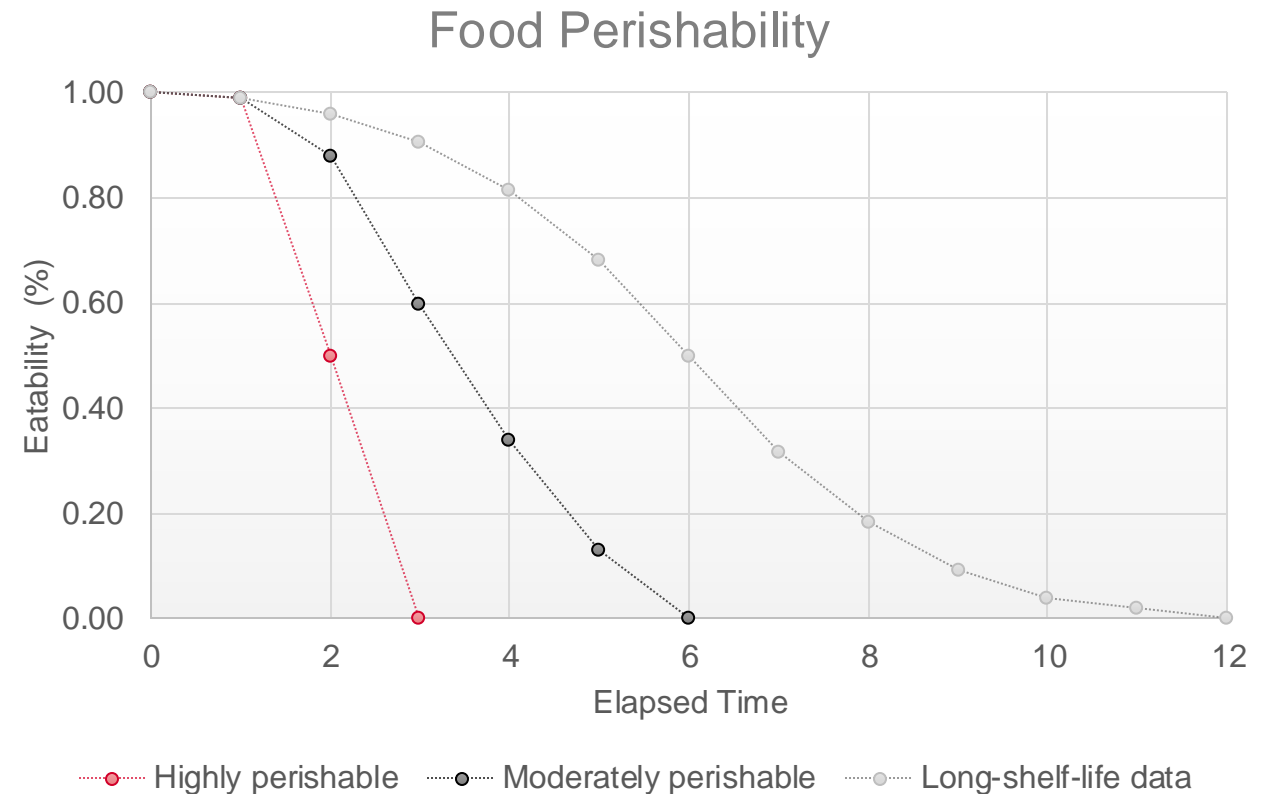
## *Understanding Data Shelf Life: Ensuring Timely & Reliable Insights*

### Analogy

Just like different supermarket products have varying expiration dates, different types of supplier assurance data have different 'shelf lives' when it comes to usefulness and reliability.

### Variables

- ❖ Highly perishable (dairy, fruits) → Needs immediate use (e.g., real-time risk scores, cyber alerts).
- ❖ Moderately perishable (bread, eggs) → Requires periodic validation (e.g., compliance checks, operational metrics).
- ❖ Long shelf life (canned goods, pasta) → Stays valid longer - needs occasional review (e.g., P&P, foundational risk assessments).





# S&P Global | Best Practices for Using External Data in your Assurance Program

## Step 1: Mapping Data Sources to Internal Requirements

### Objective:



Organizations must align third-party risk data sources with their internal risk assessment frameworks. This ensures that each data type contributes appropriately to risk evaluations, enabling better decision-making.

#### Consider:

- Assess Internal Expertise – Do we have the skills and resources to map third-party data to our risk framework?
- Evaluate Vendor Mapping – Has the data provider already mapped sources to key risk categories, or do we need to do it?
- Validate Accuracy & Fit – Does the mapped data align with our internal assessment methodology and risk priorities?

### Steps



- ❖ Identify Key Risk Categories and Map Data Sources to internal TPRM Requirements:
  - ❖ Cybersecurity Risk (SOC Reports, Continuous Monitoring)
  - ❖ Operational Risk (Assessments, Incident Reports)
  - ❖ Regulatory Compliance (DDQs, Audit Findings)
- ❖ Define Internal Requirements & Weightings
  - ❖ Set decay rates for each data source based on frequency and relevance.
  - ❖ Assign ceilings (maximum contribution) to ensure balance.

### Example



ID	Framework Alignment	Control Objective	SOC Mapping	ISO 27001	DDQ Mapping	Assessment Mapping	Continuous Monitoring Source
1.03	CRP/PA-03.01: Based on the risk level of a user access or a specific transaction, the organization defines and implements authentication requirements, which may include multi-factor or out-of-band authentication, and may adopt other real-time risk prevention or mitigation tactics.	The organization mandates the use of multifactor authentication (MFA) for all internet-facing applications, systems, and data within the scope of its security framework to ensure secure access and reduce the risk of unauthorized entry.	COE.1: The entity implements logical access security software, infrastructure, and architectures over protected information assets to protect them from security events to meet the entity's objectives.	A.8.3: Secure authentication technologies and procedures shall be implemented based on information access restrictions and the topic-specific policy on access control.	ISO 15504, ISO 172, 80548, 1005194	LAP25: As an organizational level, does your company mandate the use of multifactor authentication for internet-facing applications, systems, and data that fall within the scope of your security framework?	Provider X, PRTRE, S.1

Source	Risk Category	Decay Rate	Ceiling (%)	Primary Use Case
SOC Reports	Cyber, Operational	Moderate	85-90%	Evidence of security controls
Continuous Monitoring	Cyber	Fast	20-50%	Real-time alerts on changes
Risk Assessments	Operational, Compliance	Slow	100%	Comprehensive risk evaluation
Self-Attested DDQs	Compliance	Moderate	50-95%	Vendor-provided insights

# S&P Global | Best Practices for Using External Data in your Assurance Program

## Step 2: Mapping Data Sources to Internal Requirements (Ex: SOC Report) -- Sigmoidal Model

### Objective:



Analyze SOC reports from multiple suppliers to assess their reliability over time.

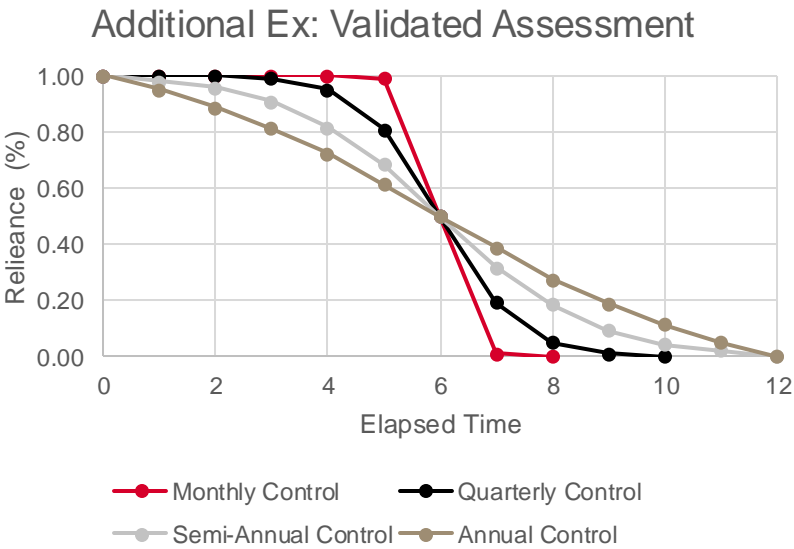
*Note: This approach can be applied to any data source mapped in Step 1.*

### Steps



- ❖ SOC reports degrade in influence as they age.
- ❖ Apply logistic decay function to adjust scores.
- ❖ Compare age-based adjusted scores.

Vendor	Vendor Inherent Risk	SOC Report Age (Months)	Decay Factor	Adjusted Score (%)	Ceiling (%)
Vendor A	Low	2	0.9	81	85
Vendor B	Medium	6	0.7	56	88
Vendor C	High	12	0.5	42.5	90
Vendor D	Low	18	0.3	22.5	85



### Key Insights



- ❖ Inherent risk determines the SOC Report ceiling (%):
  - ❖ Low Risk vendors are capped at 85% reliance.
  - ❖ Medium Risk vendors at 88%.
  - ❖ High Risk vendors at 90%.
- ❖ Recent SOC reports (2-6 months) retain significant weight.
- ❖ Older reports (12+ months) contribute far less to risk assessment.
- ❖ Using decay-adjusted scoring ensures reliance on fresh, relevant data.

$$f(x) = \frac{1}{1 + e^{-x}}$$

# S&P Global | Best Practices for Using External Data in your Assurance Program

Scenario 1: All Risk Levels Reach Theoretical 100% Reliance

## Objective:



To demonstrate how risk level affects total reliance score and how reliance shifts across data sources.

## Key Takeaways



- ❖ All risk levels can reach a theoretical 100% reliance when data is well-distributed across sources. SME judgement should be a “tie-breaker”
- ❖ High Risk suppliers depend more on SOC reports & assessments.
- ❖ Low Risk suppliers rely more on continuous data & DDQs.

Supplier Risk Level	Δt SOC Report	Δt Continuous Data	Δt Assessment	Δt Self-Attested DDQ	Assessment Score (%)	SOC Report Score (%)	Continuous Data Score (%)	Self-Attested DDQ Score (%)	Total Reliance (%)
High Risk	3 months	<1 month	6 months	2 months	25	75	20	10	100
Medium Risk	6 months	1 month	9 months	3 months	10	55	25	10	100
Low Risk	9 months	2 months	12 months	4 months	5	40	30	25	100

# S&P Global | Best Practices for Using External Data in your Assurance Program

## Scenario 2: Exceeding and Falling Short of Reliance Thresholds

### Objective:



To demonstrate how risk level affects total reliance score and how reliance shifts across data sources.

### Key Takeaways



- ❖ Low Risk supplier exceeds theoretical 100% reliance (110%) due to strong continuous data and DDQ scores. Consider reducing effort.
- ❖ High Risk supplier remains at theoretical 100%, with balanced reliance on SOC reports and assessments.
- ❖ Medium Risk supplier falls short at 55%, as older SOC reports and assessments reduce its weight. Direct due diligence may be necessary.

Supplier Risk Level	Δt SOC Report	Δt Continuous Data	Δt Assessment	Δt Self-Attested DDQ	Assessment Score (%)	SOC Report Score (%)	Continuous Data Score (%)	Self-Attested DDQ Score (%)	Total Reliance (%)
High Risk	3 months	<1 month	6 months	2 months	30	60	10	10	100
Medium Risk	9 months	3 months	12 months	5 months	5	30	15	5	55
Low Risk	6 months	1 month	9 months	3 months	15	50	25	20	110

# S&P Global | Best Practices for Using External Data in your Assurance Program

## Control Level Example

**Composite “Scoring”:** ID.AM-02: Inventories of software, services, and systems managed by the organization are maintained

### 1 Map Sources to Control

Control Objective (CYBER)	Quality	Quality Details	Timeliness	Confidence Level
ID.AM-02: Inventories of software, services, and systems managed by the organization are maintained	Audit Certification with Report (Non-Qualified) (55)	CC6.1 - The entity implements logical access security software, infrastructure, and architectures over protected information assets to protect them from security events to meet the entity's objectives. NO EXCEPTIONS	6-12 months (50)	105

### 2 Determine Confidence Levels of Data Sources

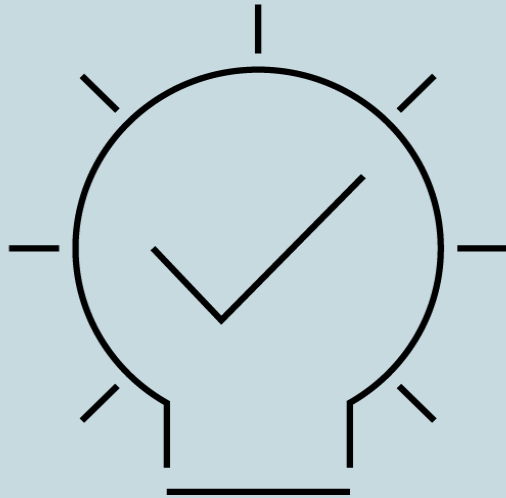
Data Source	Quality	Timelines	Density	Confidence Levels
ISO 27001 Audit Certification	Audit Certification (20)	6-12 months (50)	N/A	70
SOC 2 Type II Audit Certification with Report (Non-Qualified)	Audit Certification with Report (Non-Qualified) (55)	6-12 months (50)	N/A	105
Best Practice Questionnaire v5.1	Best Practice Questionnaire with Artifacts (45)	0-6 months (75)	N/A	120

### 3 Determine Confidence Level at the Control Level

Control Objective (CYBER)	Quality	Quality Details	Timeliness	Confidence Level
ID.AM-02: Inventories of software, services, and systems managed by the organization are maintained	Best Practice Questionnaire with Artifacts (45)	TAM02 - Does your organization maintain an asset inventory of physical devices, hardware, software, business applications, and information systems (including cloud systems)? YES	0-6 months (75)	120



# S&P Global | Key Takeaways



- Big data is a powerful tool, but risk decisions must be strategic
- Best practice: Use a mix of internal, external, and independent sources
- Avoid over-reliance on automated scores—human oversight is key
- Build a structured framework for weighing data in risk decisions

# Thank you