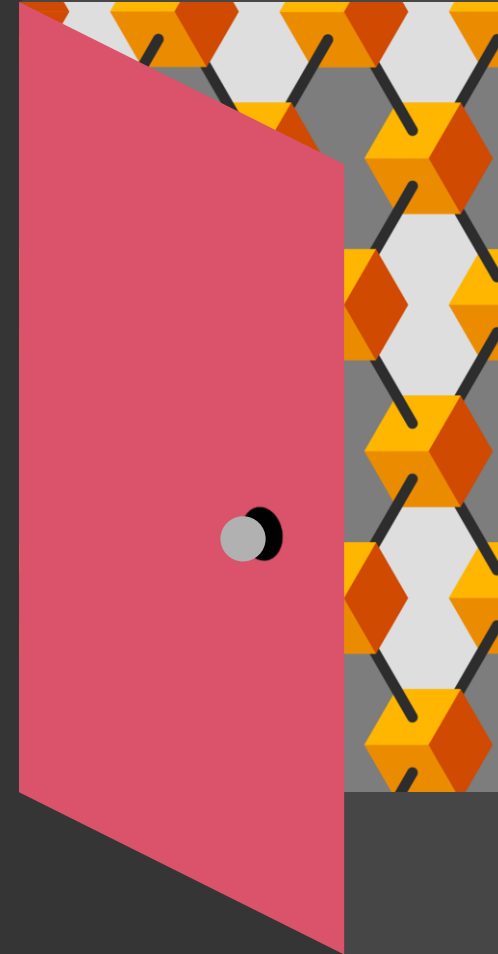


# NIS<sub>2</sub> PAM

---

Præsentation af Lukas Pavka and Kim Buchwald Mikkelsen, PwC DK



# Table of contents

Section	Page
Brief overview of NIS2	3
Main NIS2 requirements	4
Get ahead of the curve – Assess and plan	5
Risk based approach	8
Compliance & Security is a journey, not a destination	15
Open discussion	16





# The NIS2 Directive provides legal measures to boost the overall level of cyber security in the EU



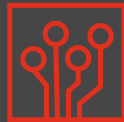
## Why? State of the cyber threat

NIS was created in response to the increased digitization of the society and increasing number of incidents that poses an immense threat to our critical infrastructure. NIS2 repeals and replaces the Network and Information Systems Directive (EU) 2016/1148 (NIS1), aiming to achieve a high common level of cybersecurity across the EU, with a focus on protecting critical infrastructure.



## What? Extended scope

NIS2 expands the definition of critical sectors in society and imposes significantly heightened cybersecurity requirements on businesses and public authorities associated with these sectors.



## Obligations

NIS2 will be implemented as executive orders (bekendtgørelser) nationally in Denmark, which makes it obligatory for organisations and authorities to be compliant to the law. NIS 2 introduces cyber risk management, incident reporting, and information-sharing obligations for specific organizations across various sectors.



## Opportunity

It brings obligations, but it also creates opportunities for getting security initiatives into the roadmap and get funding approved with more management attention nowadays for the compliance with the NIS2 and other recent regulations.

# Main NIS2 requirements

## NIS2 introduces stricter cybersecurity & risk management requirements

NIS2 Article 21 directs member states to ensure that essential and important entities manage risk by implementing robust systems, policies and best practices covering a wide range of cybersecurity measures and disciplines including:

- Risk analysis and information system security
- Incident handling and reporting
- Business continuity, such as backup management and disaster recovery
- Crisis management
- Supply chain security
- Systems acquisition, development and maintenance security
- Basic cyber hygiene practices and cybersecurity training
- Cryptography and encryption technologies
- Human resources security, access control policies and asset management
- Zero Trust access (multifactor authentication, continuous authentication)

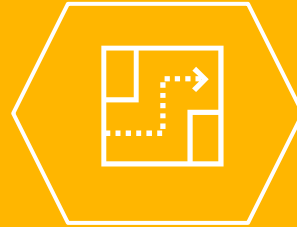
# Get ahead of the curve – Assess and plan

*“Organizations without a formal program will spend 40% more on IAM capabilities while achieving less than organizations with such programs.” – Gartner*



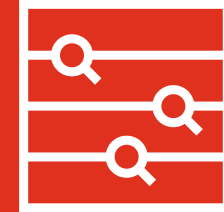
## Current state assessment

1. Conduct an As-Is assessment
2. Identify gaps against the requirements
3. Develop assessment methodology
4. Classify the gaps and map them to concrete parts of your organization
5. Develop an inventory and update it regularly with progress



## Strategy and roadmap for closing the gaps

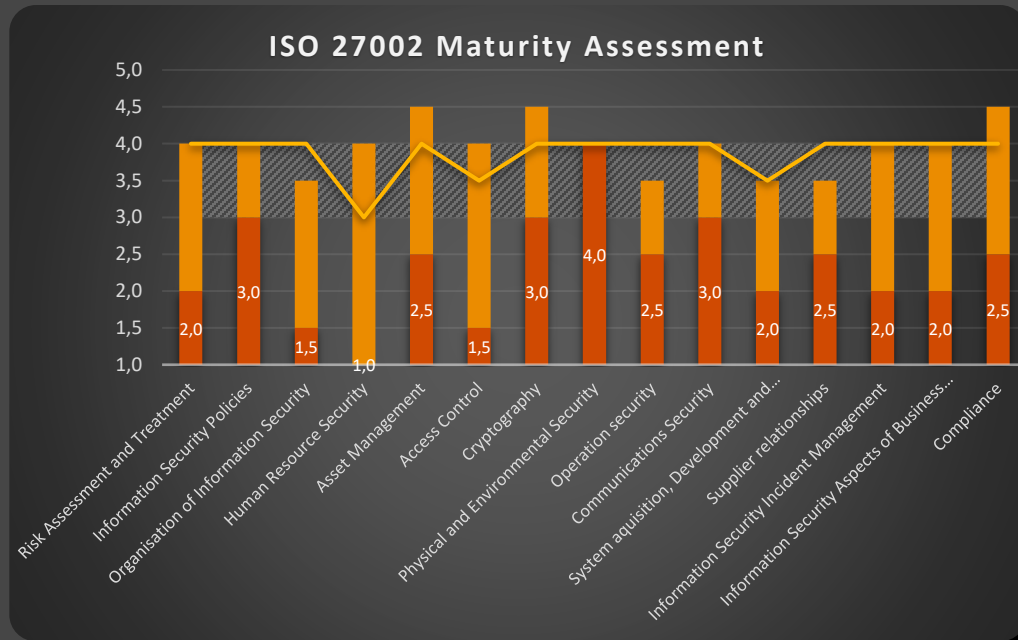
1. Analyze the identified gaps
2. Prioritize the findings based on risks, complexity to implement and importance against NIS2 requirements
3. Define the future state
4. Update Enterprise strategy
5. Gaps mitigation roadmap with timelines for each gap



## Continuous risk assessments

1. Define the process to continuously evaluate your risks
2. Regularly perform the assessments and document progression and new gaps identified
3. Document results of each iteration
4. Update Roadmap and Strategy accordingly

# Example assessment



ISO 27001 Clauses:		4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	A16	A17	A18
		Risk	Information security policies	Organisation of information security	Human resource security	Asset management	Access control	Cryptography	Physical and environmental security	Operations security	Communications security	System acquisition, development and maintenance	Supplier relationships	Information security incident management	Information security aspects of business continuity management	Compliance
NIS2 ref.	NIS 2 directive															
Art 11.5	Requirements, technical capabilities and tasks of CSIRTS			X												
Art 20.1	Management approval of cybersecurity risk-management measures	X		X												
Art 20.2	Training and education of management				X											
Art 21.2(a).1	Policies on risk analysis and i	X														
Art 21.2(a).2	Information system security policies		X													
Art 21.2(b)	Incident handling													X		
Art 21.2(c).1	Business continuity														X	
Art 21.2(c).2	Backup management									X						
Art 21.2(c).3	Disaster recovery/crisis management														X	
Art 21.2(d)	Supply Chain Security												X			
Art 21.2(e).1	Network security (acquisition, development and maintenance)										X					
Art 21.2(e).2	Network security (vulnerability handling and disclosure)									X						
Art 21.2(f)	Policies and procedures to assess the effectiveness of cybersecurity risk ma	X	X													
Art 21.2(g)	Basic cyber hygiene practices and cybersecurity training				X											
Art 21.2(h)	Policies and procedures regarding the use of cryptography							X								
Art 21.2(i).1	Human resource security				X											
Art 21.2(i).2	Access control policies						X									
Art 21.2(i).3	Asset management					X										
Art 21.2(j).1	Multi-factor authentication or continuous authentication solutions						X									
Art 21.2(j).2	Secured voice, video and text communications										X					
Art 21.2(j).3	Secured emergency communications systems within the entity, where appropriate														X	
Art 23.1	Report incident to competent authority/CSIRT			X												
Art 32.2	Supervision and enforcement measures in relation to essential entities															X
Art 33.2	Supervision and enforcement measures in relation to important entities															X
Para 58	The manufacturer or provider of ICT products or services should also put in place the necessary procedures to receive vulnerability information from									X						
Para 77	Responsibility of promoting and implementing cybersecurity risk management	X														
Para 79	Physical security								X							
Para 82	Cyber risk management measures should be proportionate to risk exposure	X														
Para 85	its relationship with its suppliers, such as providers of data storage and processing services or managed security services and software editors, is	X											X	X		

# IAM and PAM directly enhances an organizations ability to comply with the following ISO2700x controls

## Introduction to ISO2700x

The use-case of ISO 2700X in relation to Identity and Access Management (IAM) and Privileged Access Management (PAM) is to provide a structured framework and guidelines for organizations to establish robust security controls, risk management processes, and continuous improvement practices to ensure the confidentiality, integrity, and availability of information assets related to identity and access management, including privileged accounts and access rights. It helps implementing the information security controls based on internationally recognized best practices

ISO 27002:2022 5.3 - Segregation of Duties

ISO 27002:2022 5.15 - Access Control

ISO 27002:2022 5.16 - Identity management

ISO 27002:2022 5.17 - Authentication information

ISO 27002:2022 5.18 - Access rights

ISO 27002:2022 8.2 - Privileged Access rights

ISO 27002:2022 8.3 - Information Access restrictions

ISO 27002:2022 8.5 - Secure authentication

ISO 27002:2022 8.15 - Logging

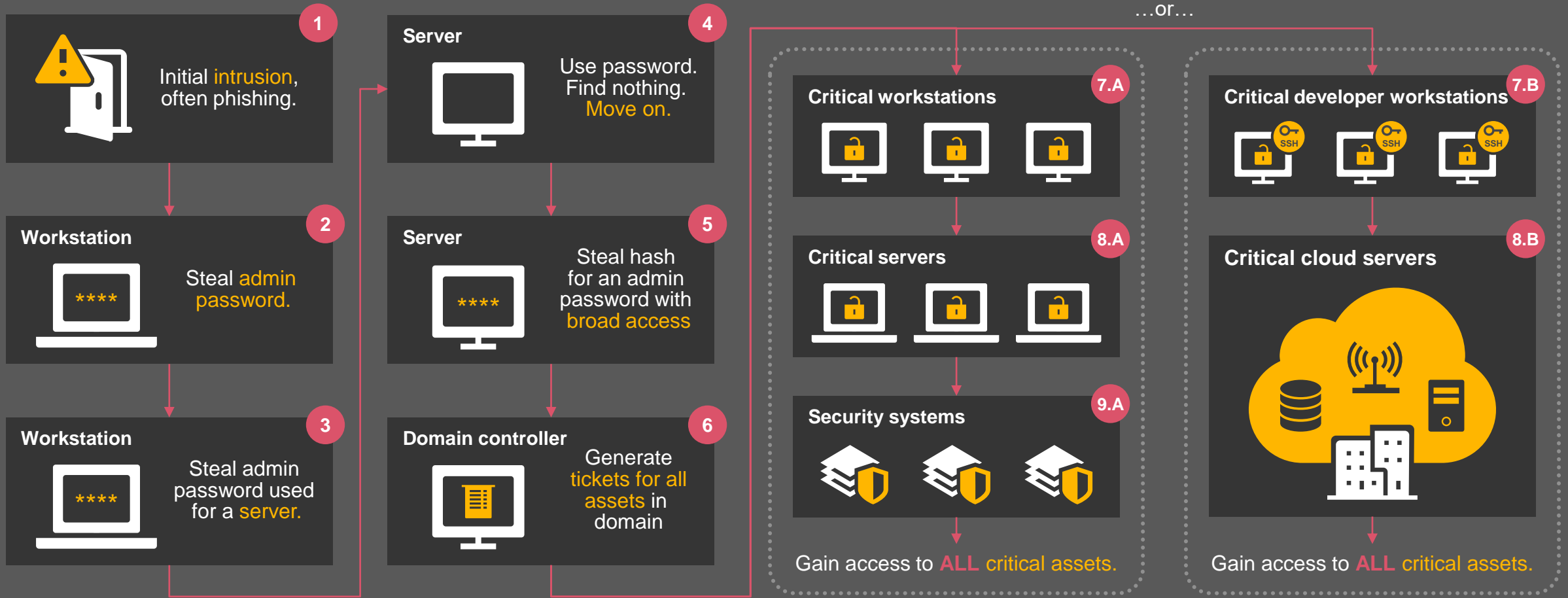
**IAM & IGA** – supporting most of the above policies, including segregation of duties, access control, access rights and identity management in general

**PAM** - supporting most of the above policies, including Information Access restrictions, secure authentication and logging

**Endpoint privilege management** - supporting segregation of duties, access control and information access restrictions, protect against ransomware and allow effective detection and reporting capabilities

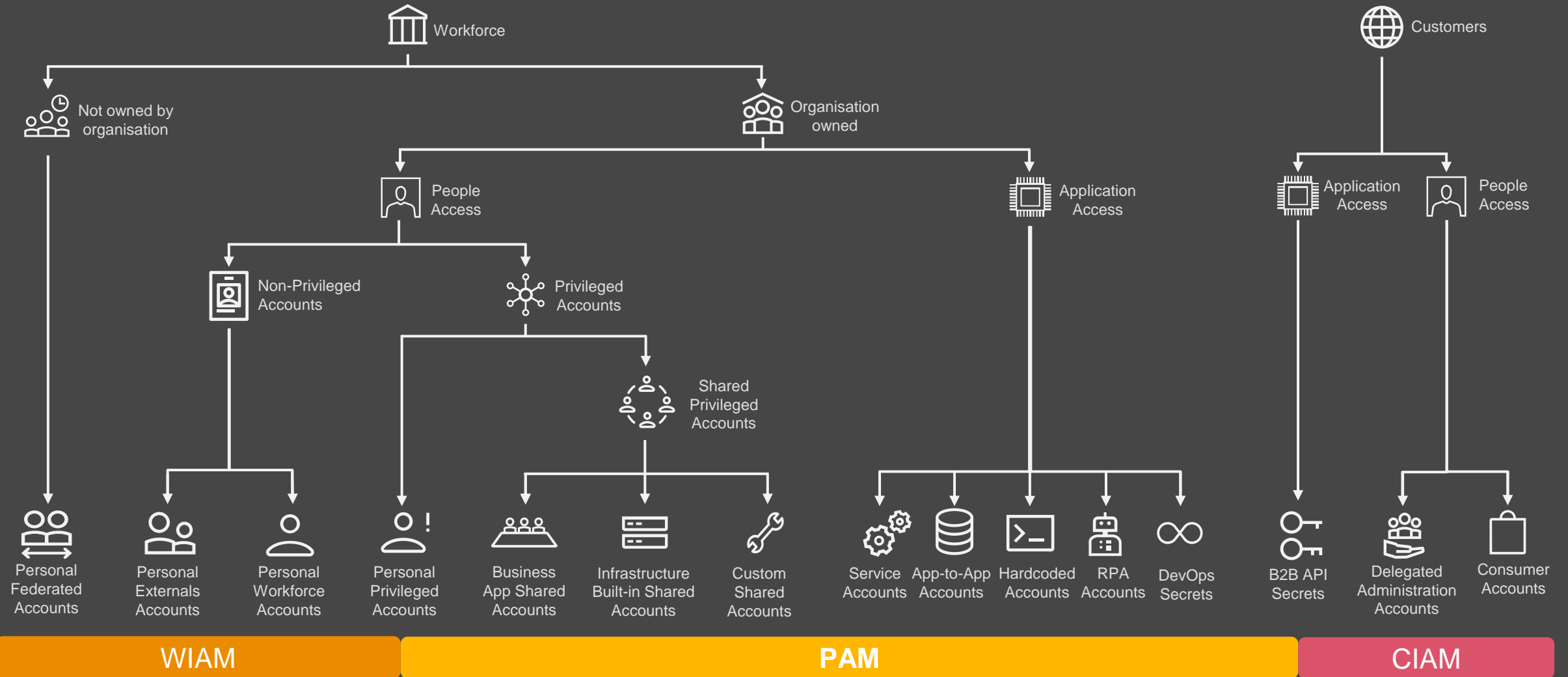


# The privilege pathway to the domain controller and beyond to the cloud



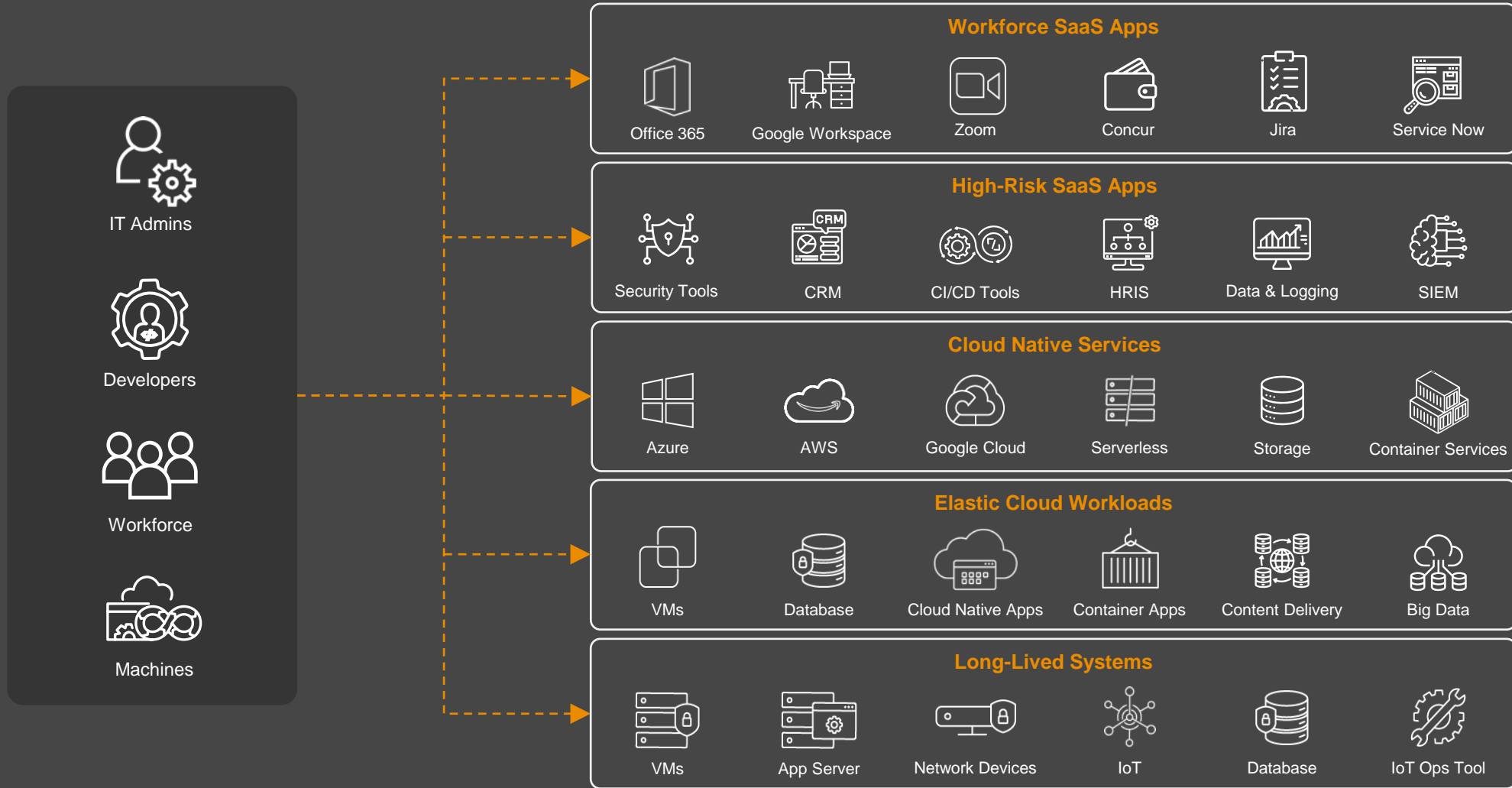


# Identities across organization



# Identities across Environments

New identities, new environments, new attack methods



# Risk based approach

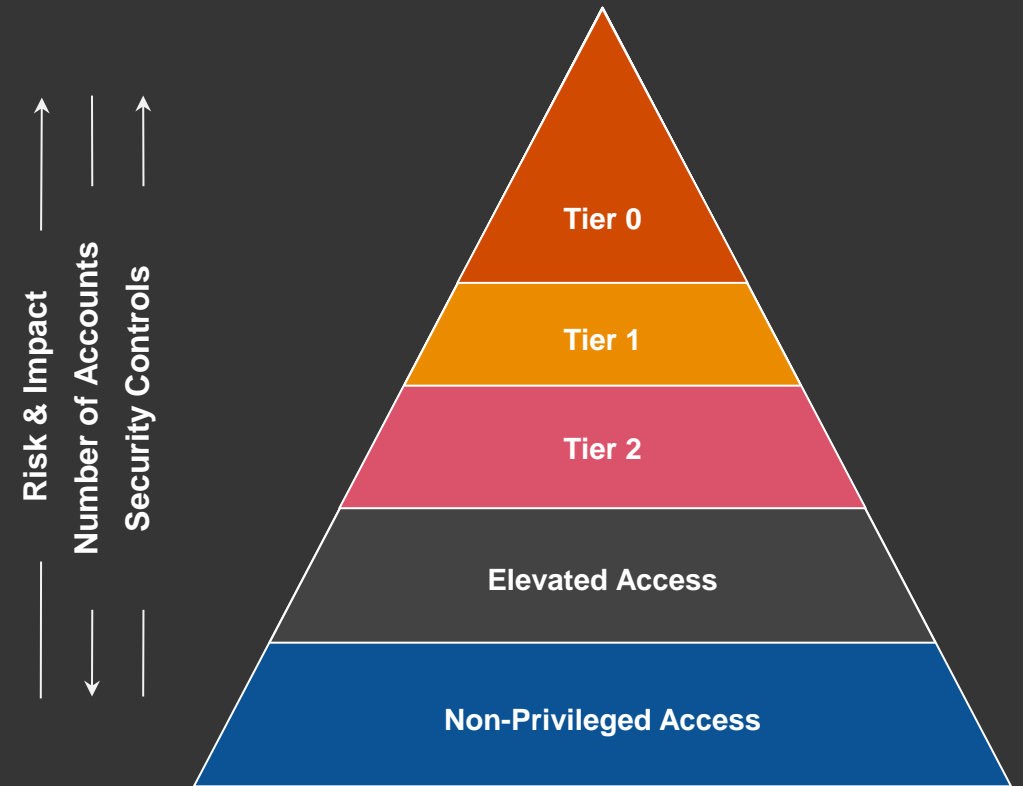
Almost every attack starts by taking over the identity of an account within the breached organization.

Having automated streamlined IAM processes is a key to protect your assets and to allow efficient work for your employees and to be compliant with all regulatory and audit requirements

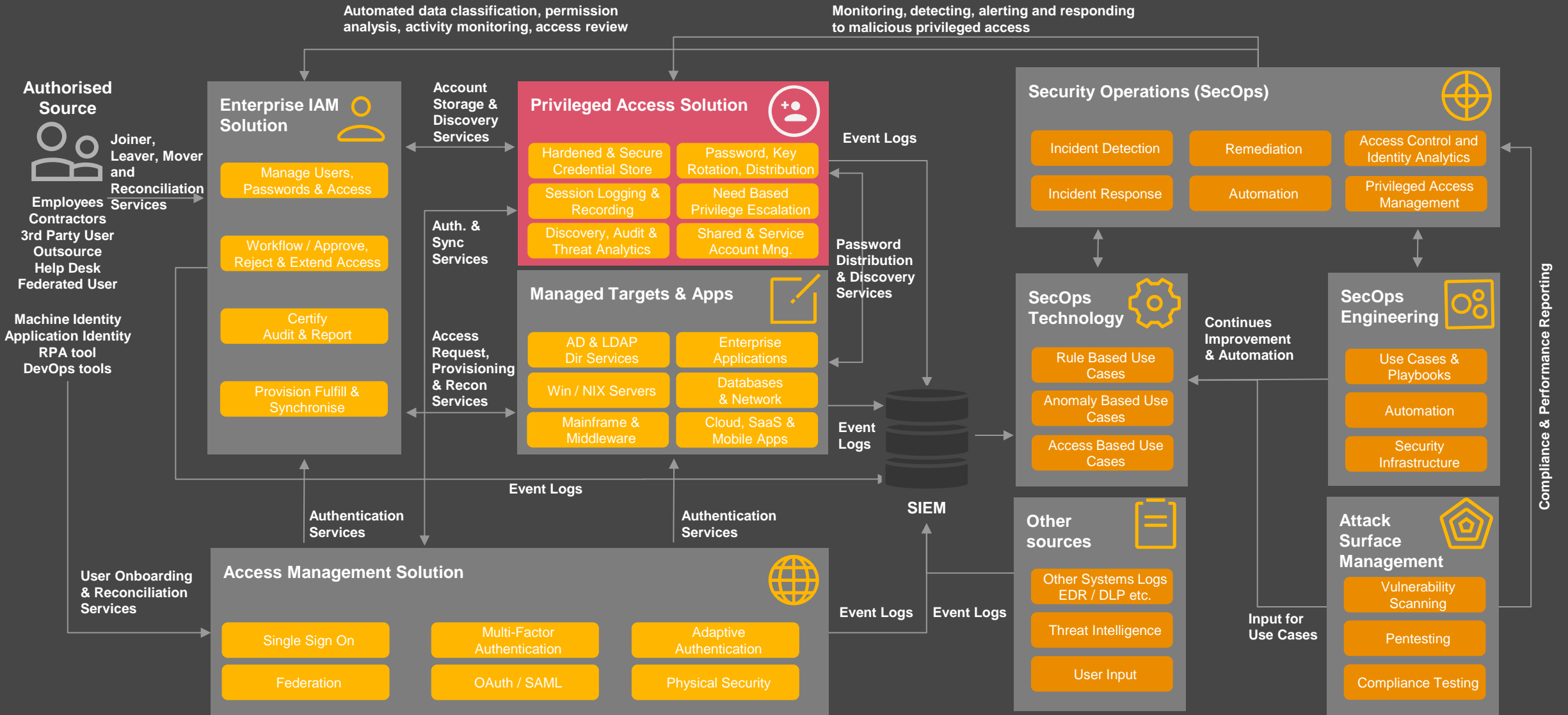
## Before enforcing controls

Below are some key considerations to be made before enforcing controls:

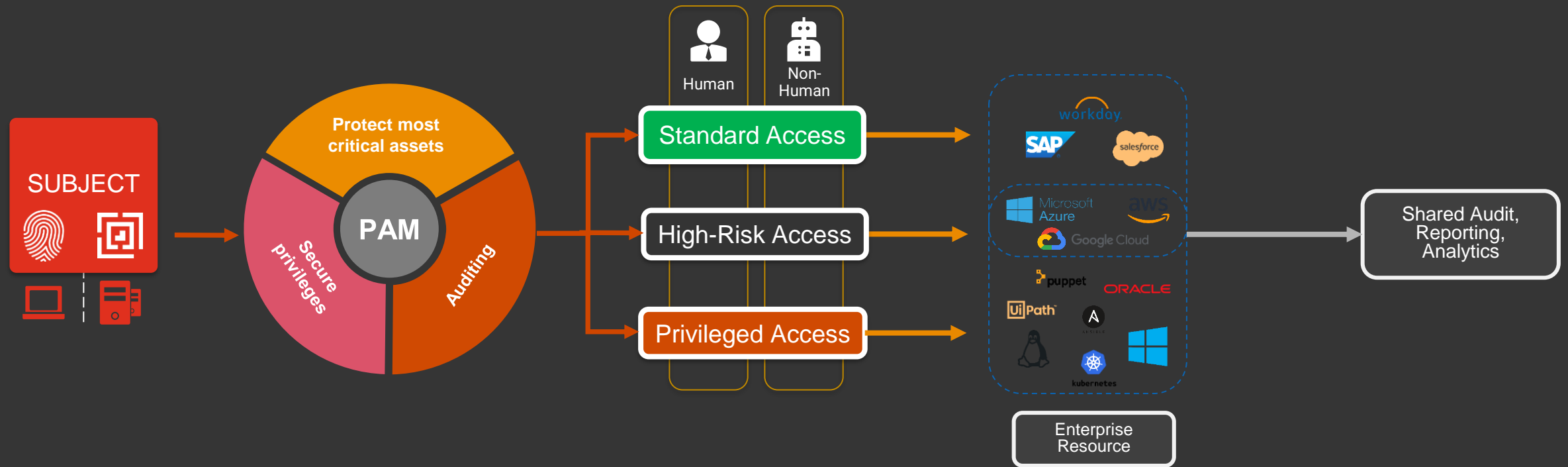
- Discovery of privileged access
- Identification of tiers based on tiering matrix
- Hygiene Exercise on accounts
- Updating the controls model to meet the standards
- Finalizing the tools for enforcing controls
- Setting up necessary integrations to allow enforcement



# Integrated Identity Security



# Identity security enabling zero trust



## STRONG ADAPTIVE VERIFICATION

- Establish Device Trust
- Adaptive Multi-Factor Authentication
- Adaptive Single-Sign On
- Endpoint Privilege Protection

## CREDENTIAL & AUTHENTICATION PROTECTION

- Protect Authentication Tokens
- Protect Credential Caches
- Manage Local Admin Credential

## CONTINUOUS APPROVAL AND AUTHORIZATION

- Identity Provisioning
- Approval Processes
- Life Cycle Management
- Automated Provisioning

## SECURED, LEAST PRIVILEGE ACCESS

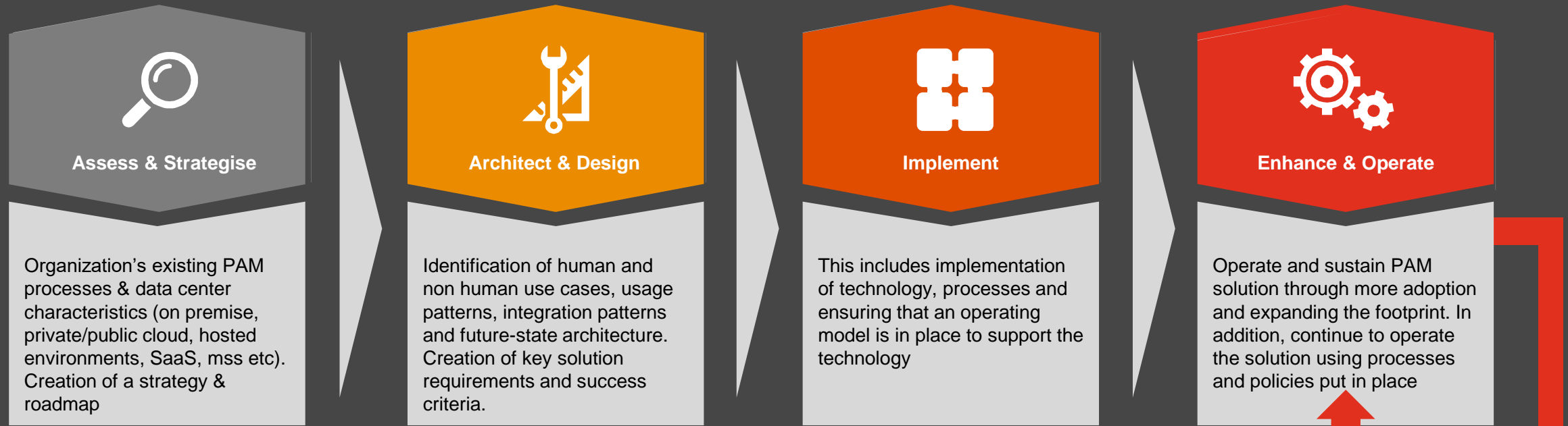
- Just in Time Access
- Just Enough Privileges
- Brokered Admin Access
- Credential Management

## CONTINUOUSLY MONITOR AND ATTEST

- Session Recording
- Activity Audit
- Threat Analytics

# People, Process & Technology (PPT)

While technology is a critical factor in any PAM program, the **people and processes** supporting the technology should be considered equally as important and must be **taken into consideration in every phase of the process** in order to create a sustainable and cost effective PAM service.



## PEOPLE

- Organisation and team structure
- Target Operating Model
- Roles & Responsibilities
- Operational Runbook Review
- Communications

## PROCESSES

- Policies
- PAM Controls
- Process guides
- Operational effectiveness
- Training material

## TECHNOLOGY

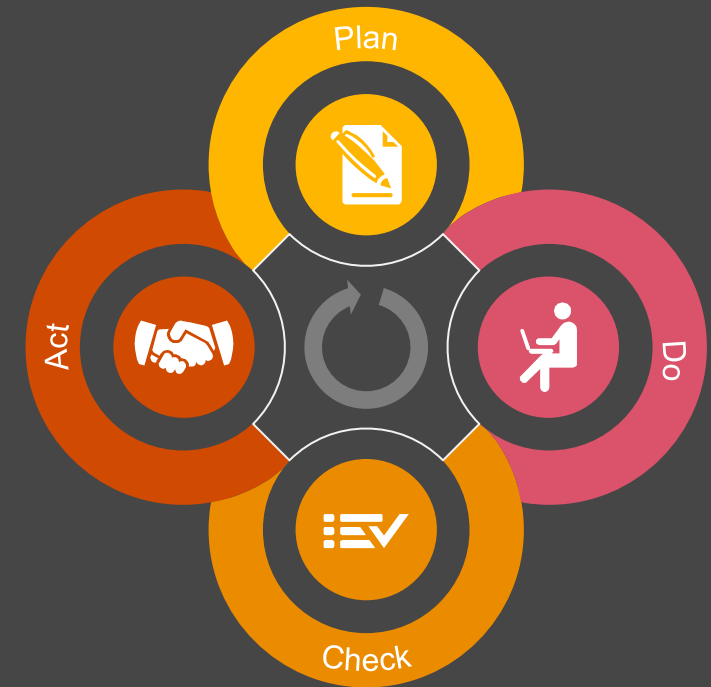
- Tool sets used for managing privileged access
- Key technology use cases & usage patterns
- Privileged access account types
- Monitoring, Audit and Recording tool set

# Execute towards the plan

## Compliance & Security is a journey, not a destination

Today's threat landscape is ever changing, and organizations also evolve over time and thus the compliance and security cannot be a one-time goal

- Understand the impact and requirements on your organization
- Be concrete with your milestones and timelines, to execute roadmap efficiently
- Set up regular checkpoints for verifying the path you are on is still leading towards NIS2 compliance
- Define metrics to help you continuously measure and identify further potential gaps or issues along the way
- Perform regular user educations in the areas of security, especially in regards to NIS2 requirements
- Test your strategies and implemented processes regularly
  - Especially the ITDR, backup, emergency and DR processes



# Open discussion





# Thank you!

[www.pwc.dk](http://www.pwc.dk)

Success skaber vi sammen...

This publication has been prepared for general guidance on matters of interest only, and does not constitute professional advice. You should not act upon the information contained in this publication without obtaining specific professional advice. No representation or warranty (express or implied) is given as to the accuracy or completeness of the information contained in this publication, and, to the extent permitted by law, PricewaterhouseCoopers Statsautoriseret Revisionspartnerselskab, its members, employees and agents do not accept or assume any liability, responsibility or duty of care for any consequences of you or anyone else acting, or refraining to act, in reliance on the information contained in this publication or for any decision based on it.

© 2025 PricewaterhouseCoopers Statsautoriseret Revisionspartnerselskab. All rights reserved. In this document, "PwC" refers to PricewaterhouseCoopers Statsautoriseret Revisionspartnerselskab which is a member firm of PricewaterhouseCoopers International Limited, each member firm of which is a separate legal entity.