

Smarter Vendor Risk Management

A Step-by-Step Framework for BFSI



PHASE 1

IDENTIFY RISK

Classify vendors
before access



PHASE 2

ASSESS SMART

Evaluate security
before onboarding



PHASE 3

LOCK IT DOWN

Strengthen contracts
& access controls



PHASE 4

CONTROL ACCESS

Enforce least privilege
from day one



PHASE 5

MONITOR ALWAYS

Continuously watch,
detect & respond



PHASE 6

ANNUAL REVIEW CHECKLIST

Review, reassess &
strengthen continuously

Phase 1

Classify Before You Assess

Not all vendors carry the same risk. Tier them first.

TIER 1 - CRITICAL

- Access to core banking, payment systems, or customer PII

Examples :

Core banking software vendors,
payment gateways, cloud providers

Requires :

Full security assessment + contractual
controls + continuous monitoring

TIER 2 - SIGNIFICANT

- Access to internal systems but not core infrastructure

Examples :

HR software, CRM platforms,
third-party analytics

Requires :

Questionnaire-based assessment
+ annual review

TIER 3 - LOW RISK

- No direct system access

Examples :

Office supply vendors, facility
management

Requires :

Basic due diligence only

GREEN:
Low

Phase 2

Pre-Onboarding Security Assessment

Before a Tier 1 or Tier 2 vendor gets access - run this :

- **Security Questionnaire** - covering data handling, access controls, incident history, certifications (ISO 27001, SOC 2)
- **Document Review** - request latest pen test reports, audit findings, and remediation evidence
- **Compliance Verification** - confirm alignment with RBI outsourcing guidelines and DORA requirements
- **Reference Checks** - speak to other financial sector clients if possible

Phase 3

Lock It Into the Contract

Every Tier 1 and Tier 2 vendor contract must include :

- **Data Protection Clauses** - how customer data is stored, processed, and deleted
- **Incident Notification SLA** - vendor must notify you within 24-48 hours of a breach
- **Right to Audit** - your team can assess vendor security posture at any time
- **Sub-contractor Disclosure** - vendor must declare and seek approval for any sub-processors
- **Exit & Data Return Clause** - clear process for data retrieval and deletion on contract end

Phase 4

Control Access

Vendor access must be strictly governed :

From Day One

- **Least Privilege Principle** - grant only the access needed for the specific engagement
- **Time-Bound Access** - set expiry dates on all vendor credentials
- **MFA Enforcement** - mandatory for all third-party access without exception
- **Dedicated Vendor Accounts** - never share internal staff credentials with vendors
- **Access Logging** - every vendor action on your systems must be logged and reviewable

Phase 5

Monitor. Don't Just Trust.

Onboarding is not the finish line. It's the starting line.

- **Real-Time Access Monitoring** - flag unusual vendor access patterns immediately
- **Threat Intelligence Feeds** - monitor if your vendors appear in breach databases or dark web listings
- **Performance & Incident Tracking** - log every security incident involving vendor systems
- **Change Notification Requirements** - vendors must inform you of significant changes to their infrastructure or personnel

Phase 6

The Annual Review Checklist

- Re-run security questionnaire - has anything changed?
- Review access logs - is granted access still appropriate?
- Request updated certifications and audit reports
- Reassess vendor tier - has their risk profile changed?
- Review contract - do clauses still meet current RBI / DORA requirements?
- Confirm incident history - any breaches or near-misses in the past 12 months?

Don't Wait for a Vendor Breach to Test Your Framework

Third-party risk maturity is measured
before an incident – not after.



BOOK A MEETING