



EASY TARGETS FOR THREAT ACTORS

- Usually have minimal security
- Difficult to detect a compromise
- Collect a trove of personal information, including location and audio



FORSEEABLE THREATS

- Massive cyberattacks including Distributed Denial of Service (DDOS) attacks
- Disruption to the business
- Physical damage to information systems



APPLICABLE LAWS

- IoT Cybersecurity Improvement Act applies to IoT devices used by the federal government
- Self-governance is encouraged



OTHER CONCERNS

- Sensitive personal information is subject to many discovery disputes
- Lawmakers and judiciary branches don't understand the technology

WHAT ABOUT THE STATES?

In 2019, CA and OR passed IoT laws requiring reasonable security, including:

- (a) a means for authentication from outside a local area network, including:
 - preprogrammed password that is unique for each connected device; or
 - a requirement that a user generates a new means of authentication before gaining first-time access; or
- (b) compliance with requirements of federal law or regulations that apply to security measures for connected devices.

IOT CYBERSECURITY IMPROVEMENT ACT

- Enacted Dec. 4, 2020.
- Mandates cybersecurity Standards and Guidelines for the acquisition and use of IoT devices capable of connecting to the Internet.
- While directly limited to those devices used by the federal government, also affects government contractors. Expected to have major spillover effect to private industry as well.
- National Institute of Standards and Technology (NIST) - SP800-213 – Issued November 2021.

ARMSTRONG TEASDALE'S PRIVACY AND DATA SECURITY TEAM



Jeffrey Schultz

ST. LOUIS | PARTNER

jschultz@atllp.com
314.259.4732



Scott Galt

ST. LOUIS | PARTNER

sgalt@atllp.com
314.259.4709



Romaine Marshall

SALT LAKE CITY | PARTNER

rmarshall@atllp.com
801.401.1604



Lucas Amodio

ST. LOUIS | SENIOR ASSOCIATE

lamodio@atllp.com
314.259.4722



Dustin Berger

DENVER | SENIOR ASSOCIATE

dberger@atllp.com
720.722.7197



Gabriela Baeza-Stout

ST. LOUIS | ASSOCIATE

gbaezastout@atllp.com
314.386.6871



Jared Keetch

SALT LAKE CITY | ASSOCIATE

jkeetch@atllp.com
801.401.1615



Casey Waughn

ST. LOUIS | ASSOCIATE

cwaughn@atllp.com
314.259.4766