

Is Your Firm Reg S-P Ready?

Score Yourself in 5 Minutes.

Check every control your firm has fully in place, total your checkmarks, and read your readiness score below. 18 controls, drawn straight from the SEC's amended Regulation S-P and what examiners now ask to see.

As of June 3, 2026, every SEC-registered adviser must maintain a written incident response program, notify affected clients within 30 days of a breach, and oversee the vendors that touch client data. Examiners now ask for evidence, not intentions. Most firms find their gaps during an exam. This checklist helps you find them first.

GOVERNANCE & WRITTEN POLICIES

- ☐ Written information security program (WISP) documented and reviewed annually
- ☐ Written incident response program covering detect, contain, and recover steps
- ☐ Current risk assessment of client data and systems on file

PROTECTING CLIENT DATA

- ☐ MFA enforced on email, custodian, CRM, and portfolio systems
- ☐ Client data encrypted at rest and in transit
- ☐ Least-privilege access with a documented offboarding process

DETECTION & RECOVERY

- ☐ 24/7 monitoring with managed detection and response (EDR / MDR)
- ☐ Endpoint protection active on every firm device
- ☐ Backups tested and isolated, with a documented recovery plan

BREACH NOTIFICATION (REG S-P)

- ☐ 30-day client breach-notification procedure ready to execute
- ☐ Response roles defined for clients, regulators, and law enforcement
- ☐ Incident response plan tested by tabletop in the last 12 months

VENDOR & THIRD-PARTY OVERSIGHT

- ☐ Annual due diligence on custodian, CRM, IT, and cloud vendors
- ☐ Contracts require vendor breach notice within 72 hours
- ☐ Vendor access to your systems reviewed quarterly

PEOPLE & RECORDKEEPING

- ☐ Ongoing security awareness training plus phishing simulations
- ☐ Secure data-disposal process for drives, paper, and devices
- ☐ Compliance evidence retained and exam-ready (policies, logs, notices)

Total Your Score

16-18 EXAM-READY

Strong posture. Keep your evidence current and tested.

11-15 GAPS TO CLOSE

Fixable exposure. Close gaps before your next SEC exam.

0-10 AT RISK

Material Reg S-P exposure. Prioritize remediation now.

See where your gaps are, and how to close them.

30 MIN • NO COST • NO COMMITMENT

Book a 30-minute consult. Walk through your checklist results with a TorchLight advisor and leave with a clear, prioritized view of what stands between your firm and an exam-ready Reg S-P posture.

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BOOK A MEETING →