



# Cyber Phenomenon Series

## The CISO and the Evolving Healthcare Landscape Information Security & Privacy Challenges and Recommendations

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# 1 Executive Summary

## 1.1 Purpose

In recent years, Phenomenati has been contracted to focus on information security, privacy, cyber resilience, (both pre- and post- breach) and enterprise risk management for a number of organizations across the broader Healthcare market sector – bio-medical research laboratories, contract research organizations (CROs)<sup>1</sup>, pharmaceutical manufacturers, healthcare network providers, and electronic healthcare record (EHR) exchanges. Across that broad set of experiences, some clear patterns have emerged which are documented herein.

This whitepaper examines cybersecurity, privacy, and operational resilience challenges across the broader Healthcare market sector, through the lens of five interconnected sub-domains or industries... Life Sciences, Biomedical, Pharmaceutical, Healthcare, and Enabling Markets & Cross-Cutting Fields... and outlines actionable recommendations to protect patient safety, safeguard intellectual property, and maintain public trust in a global, high-stakes ecosystem.

## 1.2 Key Findings

### 1. Top Cross-Industry Threats

- **Ransomware** disrupting patient care, research, and manufacturing.
- **IP Theft** targeting proprietary science, manufacturing processes, and AI models.
- **Supply Chain Exploitation** through third-party vulnerabilities and counterfeit insertion.
- **Regulatory Non-Compliance** from inconsistent data governance across jurisdictions.

### 2. Common Weaknesses

- Legacy **IT and OT systems** with limited patching capability.
- Inconsistent application of **Zero-Trust**<sup>2</sup> and **network segmentation**<sup>3</sup>.
- Underdeveloped **third-party risk management**<sup>4</sup> and contract enforcement.
- Gaps in **biosecurity** and ethics oversight for emerging biotechnologies.

### 3. Global Interdependence Creates Systemic Risk

- A breach or operational failure in one industry can trigger cascading impacts across others.
- Multi-party collaboration and global **supply chains** amplify exposure to cyber, privacy, and regulatory risks.

## 1.3 Strategic Recommendations

### 1. Embed Security-by-Design

- Integrate security and privacy controls into all R&D, manufacturing, and clinical workflows.
- Use **privacy-by-design**<sup>5</sup> and **data minimization**<sup>6</sup> principles for PHI, genomic, and research data.

### 2. Adopt Zero-Trust Architectures<sup>7</sup>

- **Segment** networks between clinical, administrative, and manufacturing environments.
- Apply **MFA**, least-privilege access, and continuous monitoring to all critical systems.

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<sup>1</sup> [https://en.wikipedia.org/wiki/Contract\\_research\\_organization](https://en.wikipedia.org/wiki/Contract_research_organization)

<sup>2</sup> [https://csrc.nist.gov/glossary/term/zero\\_trust\\_architecture](https://csrc.nist.gov/glossary/term/zero_trust_architecture)

<sup>3</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>4</sup> <https://www.gartner.com/en/legal-compliance/topics/third-party-risk-management-tpm>

<sup>5</sup> [https://en.wikipedia.org/wiki/Privacy\\_by\\_design](https://en.wikipedia.org/wiki/Privacy_by_design)

<sup>6</sup> [https://en.wikipedia.org/wiki/Data\\_minimization](https://en.wikipedia.org/wiki/Data_minimization)

<sup>7</sup> [https://csrc.nist.gov/glossary/term/zero\\_trust\\_architecture](https://csrc.nist.gov/glossary/term/zero_trust_architecture)



### 3. Strengthen Third-Party Risk Management<sup>8</sup>

- Vet all vendors, CROs, CDMOs<sup>9</sup>, and logistics partners for cybersecurity maturity.
- Include breach notification SLAs, data protection clauses, and audit rights in contracts.

### 4. Protect High-Value Intellectual Property

- Encrypt all proprietary designs, processes, and models in transit and at rest.
- Use **DLP**, **DRM**<sup>10</sup>, and **watermarking**<sup>11</sup> to safeguard digital assets.

### 5. Harden Operational Resilience

- Maintain and test business continuity, disaster recovery, and downtime procedures.
- Simulate ransomware and supply chain disruption scenarios.

### 6. Integrate Ethics, Compliance & Biosecurity

- Unify governance for ethical oversight, regulatory compliance, and biosafety/biosecurity.
- Align global projects to the strictest applicable standards.

## 1.4 Call to Action

Board-level commitment is required to prioritize sustained investment in cybersecurity, privacy, and operational resilience. Executives must view these not as simply *compliance* obligations but as **strategic enablers of innovation and market leadership**. Adopting the recommendations herein will reduce systemic **risk**, protect sensitive assets, and preserve public **trust**... ensuring that advances in life sciences and healthcare can proceed without compromising safety, security, or integrity.

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<sup>8</sup> <https://www.gartner.com/en/legal-compliance/topics/third-party-risk-management-tpm>

<sup>9</sup> [https://en.wikipedia.org/wiki/Contract\\_manufacturing\\_organization](https://en.wikipedia.org/wiki/Contract_manufacturing_organization)

<sup>10</sup> [https://en.wikipedia.org/wiki/Digital\\_rights\\_management](https://en.wikipedia.org/wiki/Digital_rights_management)

<sup>11</sup> [https://en.wikipedia.org/wiki/Digital\\_watermarking](https://en.wikipedia.org/wiki/Digital_watermarking)

## 2 Global Sector Introduction

In today's interconnected and data-driven world, the convergence of life sciences, biomedical research, pharmaceuticals, and healthcare with advanced information technologies has created unprecedented opportunities for innovation, efficiency, and patient benefit. At the same time, this transformation has exposed organizations across these "industry groups" (according to the Global Industry Classification System [GICS]<sup>12</sup>) to a growing set of information security and privacy challenges. Sensitive **research data, intellectual property, patient health information (PHI), clinical trial results, and supply chain details** have become **high-value targets** for cybercriminals, nation-state actors, and industrial espionage efforts. The stakes are exceptionally high: successful attacks can *halt research pipelines, compromise patient safety, cause regulatory violations, and inflict significant reputational and financial damage*.

Across all the industry groups covered in this whitepaper, stakeholders must navigate a complex **regulatory** environment spanning HIPAA<sup>13</sup>, GDPR<sup>14</sup>, CCPA<sup>15</sup>, PIPEDA<sup>16</sup>, and region-specific frameworks like the EU Clinical Trials Regulation<sup>17</sup>, China's Personal Information Protection Law (PIPL<sup>18</sup>), and Brazil's LGPD<sup>19</sup>. These requirements overlap with industry-specific **standards** such as **Good Clinical Practice (GCP)**<sup>20</sup>, **Good Manufacturing Practice (GMP)**<sup>21</sup>, **ISO 13485**<sup>22</sup>, and biosecurity **directives**. Failure to maintain **compliance** exposes organizations to legal **sanctions** while eroding stakeholder **trust**.

The modern **attack surface**<sup>23</sup> is expanding rapidly due to the digitization of laboratory processes, the proliferation of connected medical and research devices, reliance on cloud-based collaboration platforms, and increased use of artificial intelligence (AI) for diagnostics and drug discovery. The need for secure data handling now extends far beyond traditional IT environments into laboratory instrumentation<sup>24</sup>, telehealth platforms<sup>25</sup>, and operational technology (OT) systems controlling pharmaceutical production lines<sup>26</sup>. The risks are amplified by the globalization of R&D and manufacturing, requiring careful attention to **cross-border** data flows<sup>27</sup>, intellectual property protections, and data sovereignty<sup>28</sup> considerations.

This whitepaper examines the specific challenges, regulatory touchpoints, and strategic recommendations for securing information and preserving privacy across five critical domains or "industry groups" within the Healthcare Market Sector:

<sup>12</sup> <https://www.msci.com/indexes/index-resources/gics>

<sup>13</sup> <https://www.hhs.gov/hipaa/index.html>

<sup>14</sup> <https://gdpr-info.eu/>

<sup>15</sup> <https://oag.ca.gov/privacy/ccpa>

<sup>16</sup> <https://www.priv.gc.ca/en/privacy-topics/privacy-laws-in-canada/the-personal-information-protection-and-electronic-documents-act-pipeda/>

<sup>17</sup> [https://health.ec.europa.eu/medicinal-products/clinical-trials/clinical-trials-regulation-eu-no-5362014\\_en](https://health.ec.europa.eu/medicinal-products/clinical-trials/clinical-trials-regulation-eu-no-5362014_en)

<sup>18</sup> <https://personalinformationprotectionlaw.com/>

<sup>19</sup> <https://iapp.org/resources/article/brazilian-data-protection-law-lgpd-english-translation/>

<sup>20</sup> <https://www.fda.gov/about-fda/center-drug-evaluation-and-research-cder/good-clinical-practice>

<sup>21</sup> <https://www.fda.gov/drugs/pharmaceutical-quality-resources/current-good-manufacturing-practice-cgmp-regulations>

<sup>22</sup> <https://www.mastercontrol.com/library/quality/iso-13485/>

<sup>23</sup> [https://csrc.nist.gov/glossary/term/attack\\_surface](https://csrc.nist.gov/glossary/term/attack_surface)

<sup>24</sup> <https://www.mdpi.com/2624-800X/5/2/24>

<sup>25</sup> <https://pmc.ncbi.nlm.nih.gov/articles/PMC9860467/>

<sup>26</sup> <https://www.fortinet.com/solutions/industries/pharma/security-threats-to-pharma-industry>

<sup>27</sup> <https://pmc.ncbi.nlm.nih.gov/articles/PMC11668341/>

<sup>28</sup> <https://incountry.com/blog/essentials-and-challenges-of-healthcare-data-sovereignty-laws/>

- Life Sciences,
- Biomedical,
- Pharmaceutical,
- Healthcare, and
- Enabling Markets & Cross-Cutting Fields.

Each section includes a decomposition of the industry group into specific industries. Then each industry discussion includes an industry-specific challenge overview, deep dives into subdomain security and privacy concerns, and targeted recommendations for resilience. By combining a strong governance framework with advanced technical safeguards, organizations can both protect their data and uphold the ethical obligations inherent to the advancement of human health and well-being.

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## 3 Life Sciences Industry Group

The Life Sciences industry group encompasses a broad range of disciplines, from foundational bioengineering, and environmental science. Across these disciplines, information security and privacy risks arise from the sensitive nature of research data, the competitive value of intellectual property, and the collaborative nature of global scientific endeavors. Research data often involves proprietary methods, genetic information, and unpublished findings that could give competitors a significant advantage if exposed.

### 3.1 Industry Group-Specific Challenges

Unlike other industries, life sciences research frequently involves collaborations across universities, government laboratories, and private companies, often spanning multiple countries with divergent data protection laws. This global collaboration increases the complexity of compliance with data transfer restrictions and intellectual property protections. The industry also faces the challenge of balancing open scientific exchange with the need to safeguard proprietary or sensitive data, particularly in high-value domains like genomics and synthetic biology.

The digitization of laboratory workflows... ranging from cloud-based bioinformatics platforms<sup>29</sup> to remote instrumentation control<sup>30</sup>... has expanded the attack surface to include laboratory information management systems (LIMS)<sup>31</sup>, sequencing machines<sup>32</sup>, imaging systems<sup>33</sup>, and specialized software. These systems are often overlooked in organizational security strategies, despite holding valuable and sensitive datasets. Furthermore, nation-state threat actors have repeatedly targeted life sciences institutions<sup>34</sup> to gain access to research in fields like vaccine development, biomanufacturing processes, and agricultural biotechnology.

To address these challenges, life sciences organizations must implement robust **access control** policies, **segment** research networks<sup>35</sup>, **encrypt** data both in transit and at rest, and maintain **strict governance** over collaboration platforms. **Threat modeling**<sup>36</sup> for high-value projects should include **insider risk assessments**, **nation-state threat capabilities**, and **third-party supply chain risks**. Further, aligning with **frameworks** such as NIST Cybersecurity Framework (CSF)<sup>37</sup>, ISO/IEC 27001<sup>38</sup>, and industry-specific **standards** like ISO 20387<sup>39</sup> for biobanking<sup>40</sup> can provide the **governance** backbone needed for sustained resilience.

<sup>29</sup> <https://dromiclabs.com/cloud-computing-in-bioinformatics-a-game-changer-for-big-data-analysis/>

<sup>30</sup> <https://www.oracle.com/health/remote-patient-monitoring/>

<sup>31</sup> <https://thirdwaveanalytics.com/blog/what-is-a-lims-system/>

<sup>32</sup> [https://en.wikipedia.org/wiki/DNA\\_sequencer](https://en.wikipedia.org/wiki/DNA_sequencer)

<sup>33</sup> <https://www.sciencedirect.com/topics/engineering/imaging-systems>

<sup>34</sup> <https://gbhackers.com/nation-state-actors-target-healthcare-institutions/>

<sup>35</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>36</sup> [https://en.wikipedia.org/wiki/Threat\\_model](https://en.wikipedia.org/wiki/Threat_model)

<sup>37</sup> <https://www.nist.gov/cyberframework>

<sup>38</sup> <https://www.iso.org/standard/27001>

<sup>39</sup> <https://www.iso.org/standard/67888.html>

<sup>40</sup> <https://www.massgeneralbrigham.org/en/about/newsroom/articles/what-is-biobanking>

## 3.2 Biological Sciences

The Biological Sciences **industry**... comprised of **sub-industries** such as Molecular Biology, Cell Biology, Genetics & Genomics, Proteomics, Microbiology & Virology, and Evolutionary Biology... operates at the intersection of cutting-edge science and sensitive data. Organizations in these industries handle vast volumes of **proprietary research**, **patient health records**, **genomic information**, and **intellectual property**, making them prime targets for cyberattacks ranging from ransomware to state-sponsored espionage.

The industry's interconnected supply chains, reliance on cloud-based research platforms, and increasing use of AI-driven analytics further expand the attack surface. Challenges in information security and privacy include safeguarding highly regulated personal health data under frameworks like HIPAA and GDPR, preventing theft of trade secrets critical to competitive advantage, and ensuring operational continuity in the face of cyber incidents that could disrupt critical research or clinical trials. Building cyber resilience is complicated by the need to balance open scientific collaboration with robust access controls, manage legacy lab systems alongside modern IT infrastructure, and address the shortage of cybersecurity expertise tailored to the unique risks of life sciences environments.

The following sections dive deeper into specific challenges and recommendations for some of the **sub-industries** within this industry.

### 3.2.1 Molecular Biology

Molecular biology research focuses on understanding the molecular mechanisms of life, including DNA, RNA, protein synthesis, and regulatory pathways. Data generated in this field... such as genomic sequences, protein structures, and experimental results... holds immense scientific and commercial value.

#### 3.2.1.1 Challenges

Security challenges include the **protection of intellectual property** related to novel genetic constructs, **safeguarding sensitive data** derived from human samples, and **preventing unauthorized access** to high-performance computing clusters used for modeling and analysis. Further, molecular biology often involves the use of **shared laboratory environments** and **cloud-based analysis tools**, increasing the potential for data leakage.

A key privacy consideration in molecular biology is the potential re-identification of anonymized genetic data<sup>41</sup>. Even when personal identifiers are removed, advanced data analytics techniques can match genetic patterns with publicly available datasets, undermining privacy protections. This raises both **ethical** and **regulatory** concerns, particularly under frameworks like GDPR, which considers **genetic data** a **special category**<sup>42</sup> of personal data requiring heightened safeguards. In the United States, regulations such as the Genetic Information Nondiscrimination Act (GINA)<sup>43</sup> and HIPAA also play a role, though they have limitations in research contexts.

#### 3.2.1.2 Recommendations

To secure molecular biology data, organizations should implement **role-based access controls** with **fine-grained permissions**, ensuring that researchers can only access datasets relevant to their projects. **Encryption** should be applied to all data at rest and in transit, including intermediate datasets stored in cloud environments. Strong **authentication** mechanisms... such as **multifactor authentication (MFA)** tied to **institutional identity providers**... should be mandated for all access to sequencing and analysis platforms.

<sup>41</sup> <https://onlineethics.org/cases/big-data-life-sciences-collection/case-big-data-genetic-privacy-re-identification-anonymized>

<sup>42</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>43</sup> [https://en.wikipedia.org/wiki/Genetic\\_Information\\_Nondiscrimination\\_Act](https://en.wikipedia.org/wiki/Genetic_Information_Nondiscrimination_Act)

**Data governance policies** should explicitly address genetic data handling, including **retention** periods, **anonymization** standards, and protocols for **controlled data sharing**. Third-party platforms and bioinformatics<sup>44</sup> tools should undergo rigorous security reviews, with contractual clauses ensuring compliance with applicable data protection laws. Finally, organizations should conduct regular tabletop exercises simulating data breach scenarios involving genetic data, ensuring readiness to respond quickly and effectively to security incidents.

### 3.2.1.3 References

Relevant standards and guidance for molecular biology data protection include:

- **ISO/IEC 27001**<sup>45</sup> – Information Security Management Systems
- **ISO 20387**<sup>46</sup> – Biobanking – General Requirements
- **OECD Guidelines**<sup>47</sup> on Human Biobanks and Genetic Research Databases
- **NIST SP 800-53**<sup>48</sup> – Security and Privacy Controls for Information Systems and Organizations
- National Institutes of Health (NIH) Genomic Data Sharing Policy<sup>49</sup>

<sup>44</sup> <https://www.genomicseducation.hee.nhs.uk/education/core-concepts/what-is-bioinformatics/>

<sup>45</sup> <https://www.iso.org/standard/27001>

<sup>46</sup> <https://www.iso.org/standard/67888.html>

<sup>47</sup> <http://www.rett databasesnetwork.org/Guidelines%20databases.pdf>

<sup>48</sup> <https://csrc.nist.gov/pubs/sp/800/53/r5/upd1/final>

<sup>49</sup> <https://grants.nih.gov/policy-and-compliance/policy-topics/sharing-policies/gds/overview>

### 3.2.2 Cell Biology

Cell biology research focuses on the structure, function, and behavior of cells, which are the basic building blocks of life. *Sensitive* data in this field often includes **high-resolution imaging** of cell structures, **live-cell microscopy** videos, and experimental results from **advanced cell culture models**.

#### 3.2.2.1 Challenges

These datasets may contain **human-derived** samples subject to privacy regulations or proprietary cell line modifications that hold significant **intellectual property value**. Additionally, research labs often rely on **specialized imaging instruments** connected to networks, creating **vulnerabilities** if device firmware, embedded systems, or data transfer mechanisms are not secured.

Another layer of complexity is that cell biology research is *highly collaborative*, often involving **academic institutions**, **pharmaceutical companies**, and **government research agencies**. Data is frequently exchanged through shared cloud repositories or LIMS platforms, which, if improperly configured, can become sources of **unauthorized data exposure**. Malicious actors... ranging from competitors to nation-state entities... may target cell biology research to obtain proprietary methods for culturing specific cell lines, which can have significant therapeutic or biomanufacturing implications.

#### 3.2.2.2 Recommendations

To mitigate risks, laboratories engaged in cell biology research should **segment**<sup>50</sup> their imaging and analysis systems from broader enterprise networks, ideally creating **isolated research network zones**. Instrumentation should run on **secured firmware** versions with signed updates, and default credentials should be eliminated. For human-derived sample research, organizations must ensure compliance with applicable laws such as HIPAA in the U.S. and GDPR in the EU, incorporating robust **consent management** and **data minimization**<sup>51</sup> strategies.

Access to shared repositories should be governed by **strict identity verification procedures**, and data should be **encrypted** both in transit and at rest. **Audit logs** should track every access and modification event, with automated alerts for unusual activity patterns. Institutions should also implement **incident response protocols** *specific to* imaging and laboratory data loss, ensuring that breaches affecting experimental reproducibility or IP integrity are rapidly contained.

#### 3.2.2.3 References

- **ISO/IEC 27001** – Information Security Management Systems
- **ISO 15189**<sup>52</sup> – Medical laboratories – Requirements for quality and competence
- **FDA Guidance for Industry** – Data Integrity and Compliance with CGMP<sup>53</sup>
- **NIST SP 800-53**<sup>54</sup> – Security and Privacy Controls
- **OECD Principles and Guidelines**<sup>55</sup> for Access to Research Data from Public Funding

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<sup>50</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>51</sup> [https://en.wikipedia.org/wiki/Data\\_minimization](https://en.wikipedia.org/wiki/Data_minimization)

<sup>52</sup> <https://www.iso.org/standard/76677.html>

<sup>53</sup> <https://www.fda.gov/media/119267>

<sup>54</sup> <https://csrc.nist.gov/pubs/sp/800/53/r5/upd1/final>

<sup>55</sup> [https://www.oecd.org/en/publications/2007/04/oecd-principles-and-guidelines-for-access-to-research-data-from-public-funding\\_g1gh7fe5.html](https://www.oecd.org/en/publications/2007/04/oecd-principles-and-guidelines-for-access-to-research-data-from-public-funding_g1gh7fe5.html)



### 3.2.3 Genetics & Genomics

Genetics and genomics research deals with the study of genes, genetic variation, and the structure and function of entire genomes. The data produced... often in terabytes per project... is among the **most sensitive** and **personally identifiable biological data** available.

#### 3.2.3.1 Challenges

Even **anonymized** datasets can be **re-identified** when cross-referenced with public genealogy databases, a risk that has been demonstrated in multiple academic studies. This raises **substantial privacy risks** for research participants and their families, as genetic information is **immutable** and has implications for biological **relatives**.

From an information security standpoint, genomics research systems are **prime targets** for nation-state actors, organized crime, and corporate espionage due to the potential for **exploitation** in drug development, personalized medicine, and even bioengineering. The scale and complexity of genomic datasets require high-performance computing clusters or specialized cloud services, which must be configured with **strong data governance controls** to prevent accidental exposure.

#### 3.2.3.2 Recommendations

Organizations should implement **layered encryption strategies**, ensuring both storage-level and application-level encryption of genomic datasets. **Role-based access controls** must be enforced down to the dataset level, with **approval workflows** for any data export requests. **Informed consent** processes must explicitly address potential **re-identification risks** and data sharing practices, and participant **withdrawal** procedures should include **secure deletion** of identifiable records where feasible.

For cloud-based genomic analysis, institutions should require that vendors maintain compliance with both industry standards and region-specific privacy regulations, including data residency guarantees. Additionally, secure multi-party computation (SMPC)<sup>56</sup> and **homomorphic encryption** should be explored for privacy-preserving collaborative genomics research, enabling **computation on encrypted data** without exposing raw sequences.

#### 3.2.3.3 References

- **ISO 20387**<sup>57</sup> – Biobanking – General Requirements
- **NIH Genomic Data Sharing Policy**<sup>58</sup>
- **OECD Guidelines on Human Biobanks**<sup>59</sup>
- **GDPR** – Special Categories<sup>60</sup> of Personal Data
- **GINA**<sup>61</sup> – Genetic Information Nondiscrimination Act (U.S.)

<sup>56</sup> <https://medium.com/pytorch/what-is-secure-multi-party-computation-8c875fb36ca5>

<sup>57</sup> <https://www.iso.org/standard/67888.html>

<sup>58</sup> <https://grants.nih.gov/policy-and-compliance/policy-topics/sharing-policies/gds>

<sup>59</sup> <https://pubmed.ncbi.nlm.nih.gov/20443450/>

<sup>60</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>61</sup> <https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/statutes/genetic-information-nondiscrimination-act-of-2008/guidance>

### 3.2.4 Proteomics

Proteomics... the large-scale study of **proteins**... generates highly complex datasets from techniques like mass spectrometry, protein microarrays, and structural modeling. While not inherently as personally identifiable as genomic data, proteomics research often correlates protein expression patterns with specific diseases or treatment outcomes, meaning that datasets can still contain sensitive health-related information. The commercial value is also significant, as **protein biomarkers**<sup>62</sup> are critical in **diagnostics**, **drug development**, and **therapeutic monitoring**.

#### 3.2.4.1 Challenges

Proteomics datasets are typically large, intricate, and require advanced analytical *pipelines*<sup>63</sup>. This creates a dependency on shared computing resources or cloud-based processing services, introducing potential points of exposure if encryption and access controls are weak. Cyber threats include unauthorized data exfiltration, intellectual property theft, and tampering with raw data or analysis scripts... potentially compromising research validity.

#### 3.2.4.2 Recommendations

Researchers should deploy secure, version-controlled analysis pipelines to ensure data integrity and reproducibility. Raw proteomics data should be stored in **encrypted repositories**, with **checksum verification** on ingestion to **detect tampering**. Strong authentication should be implemented for all computational resources, and shared analysis environments should be **containerized** to **isolate** research projects.

Institutions should also adopt continuous monitoring solutions for research data repositories to detect **unusual access patterns**, especially for datasets linked to commercially valuable **biomarkers**. Clear intellectual property handling agreements between collaborating parties should outline ownership, publication rights, and security responsibilities.

#### 3.2.4.3 References

- **FAIR Principles for Scientific Data Management**<sup>64</sup> (Findable, Accessible, Interoperable, Reusable)
- **ISO/IEC 27001**<sup>65</sup> – Information Security Management Systems
- **NIST SP 800-171**<sup>66</sup> – Protecting Controlled Unclassified Information in Nonfederal Systems
- **FDA Guidance for Industry**<sup>67</sup> – Bioanalytical Method Validation

<sup>62</sup> <https://www.nautilus.bio/blog/what-are-protein-biomarkers/>

<sup>63</sup> <https://www.gartner.com/en/documents/3980172>

<sup>64</sup> <https://www.go-fair.org/fair-principles/>

<sup>65</sup> <https://www.iso.org/standard/27001>

<sup>66</sup> <https://csrc.nist.gov/pubs/sp/800/171/r2/upd1/final>

<sup>67</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/m10-bioanalytical-method-validation-and-study-sample-analysis>

### 3.2.5 Microbiology & Virology

Microbiology and virology research involves studying **microorganisms** such as *bacteria*, *fungi*, and *viruses*, often including **high-risk pathogens**. The data from these fields is not only scientifically sensitive but can also have direct implications for **public health**, **national security**, and **biodefense**.

#### 3.2.5.1 Challenges

Genome sequences of **pathogenic** organisms, details on **virulence** factors, and laboratory methodologies for **culturing** or **modifying dangerous microbes** are considered **high-value targets for cyberespionage and potential misuse in bioterrorism**.

In addition to intentional threats, **unintentional data exposure** through **misconfigured** laboratory networks, **unsecured** research equipment, or **improperly handled** cloud repositories is a growing concern. Many microbiology and virology labs now use automated, *internet-connected sequencing systems*, *culture monitoring devices*, and *cloud-based data analytics platforms*, each of which can serve as an entry point for attackers if not properly secured. The dual-use nature of this research... where findings could be beneficial in vaccine development but harmful if misused... places an additional **ethical** and **regulatory** burden on institutions.

#### 3.2.5.2 Recommendations

Microbiology and virology research facilities should maintain both **physical** and **logical network segmentation**<sup>68</sup> for **high-containment laboratories** (BSL-3 and BSL-4<sup>69</sup>). All research systems should be placed on **isolated VLANs** with no direct internet access, using **controlled jump hosts** for any external communication. Data at rest must be **encrypted** with hardware security module (**HSM**)-**managed keys**, and all transmissions should use end-to-end encryption with authenticated sessions.

Institutions should also implement “**need-to-know**” access restrictions for sensitive pathogen data, with multi-factor authentication and **granular access logs**. Regular **red team exercises** can test both physical and cyber defenses, simulating attempts to obtain high-risk data. Finally, strict adherence to **biosecurity risk assessments**, combined with *compliance* with **international treaties and ethical frameworks**, should guide all research involving potentially dangerous microorganisms.

#### 3.2.5.3 References

- **WHO Laboratory Biosafety Manual**<sup>70</sup> (4th edition)
- **U.S. Federal Select Agent Program**<sup>71</sup>
- **OECD Best Practices for Biological Resource Centres**<sup>72</sup>
- **NIST SP 800-53 – Security and Privacy Controls**
- **Biological Weapons Convention (BWC)**<sup>73</sup> guidelines

<sup>68</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>69</sup> <https://www.cdc.gov/training/quicklearns/biosafety/>

<sup>70</sup> <https://www.who.int/publications/i/item/9789240011311>

<sup>71</sup> <https://www.selectagents.gov/>

<sup>72</sup> [https://www.oecd.org/en/publications/oecd-best-practice-guidelines-for-biological-resource-centres\\_9789264128767-en.html](https://www.oecd.org/en/publications/oecd-best-practice-guidelines-for-biological-resource-centres_9789264128767-en.html)

<sup>73</sup> <https://disarmament.unoda.org/biological-weapons/>

### 3.2.6 Evolutionary Biology

Evolutionary biology studies the **origins**, **changes**, and **diversification** of life over time, often using large-scale genetic, fossil, ecological, and computational datasets. While much of this research is not directly tied to individual personal information, modern evolutionary studies increasingly incorporate genomic data from living populations.

#### 3.2.6.1 Challenges

This integration can introduce **privacy concerns**... particularly for **indigenous** or **protected populations**... where misuse or unauthorized sharing of genetic data may result in **cultural harm** or **discrimination**.

There are also **intellectual property** and **ethical considerations** related to the discovery of novel genes, enzymes, or adaptive traits with potential commercial applications. When datasets cross national borders, they can trigger compliance obligations under agreements like the **Nagoya Protocol on Access and Benefit Sharing**<sup>74</sup>, which governs the use of genetic resources. Additionally, the collaborative and international nature of evolutionary biology research increases the risk of inadvertent data leakage through shared research infrastructure, poorly secured data transfer systems, or insufficiently vetted third-party collaborators.

#### 3.2.6.2 Recommendations

Research teams should implement **culturally sensitive data governance** practices, especially when working with genetic material from **indigenous populations** or **biodiversity hotspots**. Data use **agreements** should explicitly define **ownership**, **benefit-sharing** terms, and acceptable research **purposes**. For genomic datasets, **encryption** should be enforced at all stages, and storage should comply with regional **data residency** requirements.

Institutions should also ensure that **computational evolutionary models**, especially those run on public or multi-tenant cloud infrastructure, are executed in **secure, containerized** environments with **controlled data ingress** and **egress**. Collaboration platforms should support **secure file transfer**, **access logging**, and **rights management**. Where possible, datasets containing identifiable human genomic material should be **anonymized** or **pseudonymized**, with controlled **re-identification** only for authorized scientific purposes.

#### 3.2.6.3 References

- **Nagoya Protocol**<sup>75</sup> – Access to Genetic Resources and the Fair<sup>76</sup> and Equitable Sharing of Benefits
- **OECD Guidelines** for the Licensing of Genetic Inventions<sup>77</sup>
- **GDPR** – Special Categories<sup>78</sup> of Personal Data
- **NIST SP 800-171**<sup>79</sup> – Controlled Unclassified Information (CUI) protection
- **FAIR Data Principles**<sup>80</sup>

<sup>74</sup> <https://www.cbd.int/abs/default.shtml>

<sup>75</sup> *ibid.*

<sup>76</sup> <https://www.go-fair.org/fair-principles/>

<sup>77</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-the-licensing-of-genetic-inventions\\_9789264018273-en-fr.html](https://www.oecd.org/en/publications/oecd-guidelines-for-the-licensing-of-genetic-inventions_9789264018273-en-fr.html)

<sup>78</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>79</sup> <https://csrc.nist.gov/pubs/sp/800/171/r2/upd1/final>

<sup>80</sup> <https://www.go-fair.org/fair-principles/>

### 3.3 Biotechnology

The Biotechnology industry... spanning drug discovery, genetic engineering, molecular diagnostics, agricultural biotech, and synthetic biology... drives innovation through the manipulation and application of biological systems. Its work generates and relies on massive amounts of **sensitive data**, including **genomic sequences**, **proprietary research methodologies**, **clinical trial results**, and **regulated patient information**<sup>81</sup>. This high-value data makes biotechnology companies attractive targets for *cybercriminals*, *hacktivists*, and *state-sponsored actors* seeking intellectual property, competitive intelligence, or the ability to disrupt critical research.

Key challenges in information security and privacy include protecting sensitive health and genetic data under stringent regulations such as HIPAA, GDPR, and emerging genetic data protection laws<sup>82</sup>; securing collaborative research environments that often span multiple institutions and jurisdictions; and defending against ransomware<sup>83</sup> or data integrity attacks that could compromise safety, compliance, or scientific outcomes.

Cyber resilience is further tested by the sector's dependence on specialized lab systems and operational technology<sup>84</sup>, which are often not designed with security in mind, as well as the pressure to maintain rapid innovation cycles without sacrificing robust risk management.

The following sections dive deeper into specific challenges and recommendations for some of the sub-industries within this industry.

#### 3.3.1 Genetic Engineering

Genetic engineering<sup>85</sup>, which involves the direct manipulation of an organism's DNA using biotechnological tools, is a core capability in modern life sciences but comes with significant security and privacy implications.

##### 3.3.1.1 Challenges

On the scientific side, proprietary genetic engineering methodologies... such as novel CRISPR variants, advanced vector designs, or proprietary transformation techniques<sup>86</sup>... are valuable intellectual property that can be targeted by industrial espionage<sup>87</sup>. On the biosecurity side, there is the risk of genetic modification technologies being misused to create harmful pathogens or circumvent regulatory oversight.

Cloud-based laboratory information management systems (LIMS)<sup>88</sup>, gene synthesis ordering platforms<sup>89</sup>, and automated molecular biology equipment<sup>90</sup> increase the attack surface by integrating cyber-physical systems into traditionally closed laboratory workflows. A compromise of these systems could lead to unauthorized access to genetic designs, manipulation of experiments, or the ability to order synthetic DNA sequences corresponding to controlled or hazardous organisms. Regulatory frameworks, such as the **U.S. Federal Select Agent Regulations** and **voluntary gene synthesis screening guidelines**<sup>91</sup>, aim to address some risks but are not globally harmonized.

<sup>81</sup> <https://www.bio.org/what-biotechnology>

<sup>82</sup> <https://www.insideprivacy.com/health-privacy/multiple-states-enact-genetic-privacy-legislation-in-a-busy-start-to-2025/>

<sup>83</sup> <https://cybersniper.ai/2024/03/ransomware-and-biotech-mitigating-risks-and-ensuring-continuity/>

<sup>84</sup> <https://www.itsasap.com/ultimate-guide-managed-it-biotechnology>

<sup>85</sup> [https://en.wikipedia.org/wiki/Genetic\\_engineering](https://en.wikipedia.org/wiki/Genetic_engineering)

<sup>86</sup> <https://www.sciencedirect.com/science/article/pii/S2162253125000113>

<sup>87</sup> <https://debuglies.com/2024/12/27/espionage-genetic-technologies-and-international-tensions-the-case-of-gene-spector/>

<sup>88</sup> [https://en.wikipedia.org/wiki/Laboratory\\_information\\_management\\_system](https://en.wikipedia.org/wiki/Laboratory_information_management_system)

<sup>89</sup> <https://genesynthesisconsortium.org/>

<sup>90</sup> <https://www.americanlaboratory.com/914-Application-Notes/186166-Automated-Molecular-Biology/>

<sup>91</sup> <https://aspr.hhs.gov/S3/Documents/syndna-guidance.pdf>

### 3.3.1.2 Recommendations

Institutions engaged in genetic engineering should adopt **strict access controls** for both digital and physical lab environments. All genetic sequence data... especially those associated with *pathogenic* organisms... should be stored in **encrypted repositories** with tiered access based on role and project. Organizations should require that any synthetic DNA orders pass through **sequence screening processes** compliant with IGSC<sup>92</sup> or equivalent guidelines, and that suppliers maintain **auditable records** of all fulfilled requests.

Cybersecurity best practices must be embedded into all **bioinformatics pipelines**, ensuring that design software, data analysis platforms, and cloud storage services are **hardened against intrusion**. Routine **supply chain security** checks for laboratory software and hardware are also critical to avoid the introduction of compromised firmware or malicious code into experimental workflows. Finally, **cross-border** collaborations should include **contractual clauses** specifying data handling, IP rights, and the lawful use of genetic material to prevent unauthorized research activities.

### 3.3.1.3 References

- **U.S. HHS** Guidance on Synthetic Genomics<sup>93</sup>
- **International Gene Synthesis Consortium (IGSC)** Screening Framework<sup>94</sup>
- **ISO 20387:2018**<sup>95</sup> – Biobanking standards
- **Biosafety in Microbiological and Biomedical Laboratories (BMBL)**<sup>96</sup>
- **OECD** Best Practices in Biotechnology<sup>97</sup>

<sup>92</sup> <https://genesynthesisconsortium.org/wp-content/uploads/IGSC-Harmonized-Screening-Protocol-v3.0-1.pdf>

<sup>93</sup> <https://aspr.hhs.gov/S3/Documents/syndna-guidance.pdf>

<sup>94</sup> <https://genesynthesisconsortium.org/wp-content/uploads/IGSC-Harmonized-Screening-Protocol-v3.0-1.pdf>

<sup>95</sup> <https://www.iso.org/standard/67888.html>

<sup>96</sup> [https://www.cdc.gov/labs/pdf/SF\\_19\\_308133-A\\_BMBL6\\_00-BOOK-WEB-final-3.pdf](https://www.cdc.gov/labs/pdf/SF_19_308133-A_BMBL6_00-BOOK-WEB-final-3.pdf)

<sup>97</sup> <file:///C:/Users/scott/Downloads/biotech-update-issue-47-june-2025.pdf>

### 3.3.2 Synthetic Biology

Synthetic biology builds on genetic engineering by not only modifying existing organisms but also designing new biological systems and life forms from the ground up<sup>98</sup>. While this field holds enormous promise for medicine, energy, agriculture, and materials science, it also amplifies security risks.

#### 3.3.2.1 Challenges

The intentional creation of **novel organisms**, **metabolic pathways**, or **synthetic genomes** can pose serious **biosecurity hazards** if those organisms have unintended pathogenic potential or environmental impact.

A major concern in synthetic biology is that design files for synthetic genomes... often shared in collaborative repositories... can be exfiltrated, modified, or misused<sup>99</sup>. Since these designs are digital, the barrier to replication is far lower than for physical samples. The use of automated **lab robotics**, open-source **genetic design tools**, and cloud-hosted **genome assembly services** further complicates the ability to track, control, and secure sensitive work. Additionally, synthetic biology research often falls into **gray areas of regulation**, where existing biosafety laws may not adequately cover novel organisms with no natural analog.

#### 3.3.2.2 Recommendations

Synthetic biology programs should integrate **security-by-design** principles into every stage of the organism design and development process. This means embedding **biosecurity risk assessments** alongside biosafety reviews, and maintaining **detailed audit logs** of all sequence *design*, *synthesis*, and *modification* activities. Organizations should implement **network segmentation**<sup>100</sup> between *design workstations*, *lab robotics*, and *internet-connected services* to limit the potential for lateral movement by attackers.

To address the regulatory gray areas, institutions should voluntarily align with the *strictest* applicable biosafety and biosecurity guidelines, even when not legally required. In addition, synthetic biology researchers should participate in community-driven **responsible research codes of conduct** and leverage third-party sequence screening services for all novel constructs. Where international collaboration is necessary, **cross-border data transfer agreements** should define the jurisdictional boundaries and encryption requirements for transmitting genome design files.

#### 3.3.2.3 References

- **U.S. National Academies**<sup>101</sup> – Safeguarding the Bioeconomy
- **World Health Organization (WHO)**<sup>102</sup> – Guidance on Responsible Life Sciences Research
- **DARPA Safe Genes Program**<sup>103</sup>
- **NIST Cyber-Physical Systems Security Framework**<sup>104</sup>
- **OECD Biosecurity Recommendations**<sup>105</sup>

<sup>98</sup> <https://www.genome.gov/about-genomics/policy-issues/Synthetic-Biology>

<sup>99</sup> <https://www.sciencedirect.com/science/article/pii/S2589004223002420>

<sup>100</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>101</sup> <https://nap.nationalacademies.org/catalog/25525/safeguarding-the-bioeconomy>

<sup>102</sup> <https://www.who.int/activities/ensuring-responsible-use-of-life-sciences-research>

<sup>103</sup> <https://www.darpa.mil/research/programs/safe-genes>

<sup>104</sup> <https://www.nist.gov/publications/framework-cyber-physical-systems-volume-1-overview>

<sup>105</sup> <https://www.sciencedirect.com/science/article/pii/S0167779921000561>



### 3.3.3 CRISPR & Genome Editing

CRISPR-Cas systems have revolutionized genome editing by offering unprecedented precision, efficiency, and accessibility<sup>106</sup>. However, the same qualities that make CRISPR powerful in legitimate research also make it a *potential dual-use concern*.

#### 3.3.3.1 Challenges

The digital nature of CRISPR guide RNA designs and the relatively simple laboratory setup required for implementation lower the barrier to entry for both *legitimate* and *malicious* actors. Sensitive research... such as **germline editing**, **gene drives**, or editing in **high-consequence pathogens**... poses severe *security* and *ethical* risks if misused or leaked.

From an information security perspective, CRISPR research often involves **proprietary** guide sequence libraries<sup>107</sup>, **unpublished** target genome datasets, and **high-value intellectual property** related to delivery mechanisms (e.g., viral vectors, lipid nanoparticles<sup>108</sup>). These are prime *targets* for **cyber-espionage**, particularly in competitive biotech markets. Unauthorized access to such materials could enable reproduction of experimental results outside of regulated environments. Furthermore, because CRISPR research often involves collaboration across multiple institutions and cloud-hosted genomic analysis platforms, *vulnerabilities* in **data storage**, **transfer**, or **authentication** could expose sensitive assets.

#### 3.3.3.2 Recommendations

CRISPR programs should implement tiered **access control** for both **physical and digital assets**, with strict **separation** between **pre-clinical** guide design data and **downstream** experimental execution. **Data pipelines** for CRISPR target discovery and off-target effect analysis should be **encrypted** in transit and at rest, and should reside on **infrastructure certified** to handle sensitive biomedical data (e.g., HIPAA-compliant cloud services).

Institutions should require regular **security audits** for laboratory automation systems and cloud-hosted CRISPR analysis tools. Given the global nature of CRISPR collaborations, **research agreements** should **include clauses on jurisdictional compliance**, **secure transfer protocols**, and **clear ownership** of guide designs and results. Where possible, **red-team biosecurity exercises** should simulate **insider threats**, unauthorized sequence **exfiltration**, and **physical breaches** of gene editing labs to test readiness. Finally, organizations should actively engage in public and regulatory discourse on CRISPR governance to anticipate evolving compliance requirements.

#### 3.3.3.3 References

- **National Academies of Sciences, Engineering, and Medicine**<sup>109</sup> – Human Genome Editing Reports
- **NIH Guidelines**<sup>110</sup> for Research Involving Recombinant or Synthetic Nucleic Acid Molecules
- **WHO Expert Advisory Committee on Human Genome Editing**<sup>111</sup>
- **ISO/IEC 27001**<sup>112</sup> for Biomedical Data
- **OECD Biosecurity Guidelines**<sup>113</sup>

<sup>106</sup> <https://royalsocietypublishing.org/doi/10.1098/rstb.2018.0087>

<sup>107</sup> <https://www.takarabio.com/learning-centers/gene-function/gene-editing/genome-wide-screening/crispr-library-screening?srltid=AfmBOorKs9IIVDIBBAOWTBXvS5sqOSGdukGUAlh7hOHKQB53VzOzOpKk>

<sup>108</sup> <https://www.helixbiotech.com/post/lipid-nanoparticles-vs-viral-vectors-a-comparison-for-gene-therapy>

<sup>109</sup> <https://www.nationalacademies.org/our-work/human-gene-editing-initiative>

<sup>110</sup> [https://osp.od.nih.gov/wp-content/uploads/NIH\\_Guidelines.pdf](https://osp.od.nih.gov/wp-content/uploads/NIH_Guidelines.pdf)

<sup>111</sup> <https://www.who.int/publications/i/item/WHO-SCI-RFH-2019-02>

<sup>112</sup> <https://www.iso.org/standard/27001>

<sup>113</sup> <https://www.biosecuritycentral.org/resource/requirements-and-protocols/guidelines-on-biosecurity-for-brcs/>

### 3.3.4 Bioinformatics

Bioinformatics is the backbone of modern biotechnology, powering the storage, analysis, and interpretation of massive biological datasets<sup>114</sup>... including **genomic**, **proteomic**, and **metabolomic** data. While this enables transformative discoveries, it also creates a vast digital attack surface<sup>115</sup>.

#### 3.3.4.1 Challenges

The high-value nature of biomedical datasets makes them a prime target for **intellectual property theft**, **ransomware**, and even **nation-state espionage**.

Additionally, bioinformatics **pipelines** often depend on open-source tools and third-party cloud environments, which can introduce unvetted code or unmonitored infrastructure vulnerabilities.

Bioinformatics **workflows** typically involve large-scale data transfers between sequencing facilities, computational clusters, and storage archives. Without robust **encryption** and **authentication**, these transfers are vulnerable to **interception** or **tampering**.

**Data integrity** is also critical... corruption or **malicious** manipulation of bioinformatics datasets could compromise research findings, lead to incorrect medical conclusions, or sabotage competitive R&D projects.

Further, compliance with privacy laws such as **GDPR** and **HIPAA** is complex in bioinformatics, especially when datasets are aggregated from multiple jurisdictions with varying data protection requirements.

#### 3.3.4.2 Recommendations

Bioinformatics platforms should adopt **secure-by-design architectures**, including **encryption** at rest and in transit, multifactor **authentication**, and **zero-trust**<sup>116</sup> networking principles. **Software supply chains** for bioinformatics tools must be **monitored** for vulnerabilities and **integrity checked** prior to deployment. Cloud-hosted bioinformatics environments should offer **data residency controls** to ensure compliance with jurisdiction-specific privacy regulations.

Organizations should implement rigorous **backup** and **disaster recovery** plans for bioinformatics datasets, with **geographically distributed storage** to ensure resilience. **Access logs** for sensitive datasets must be **continuously monitored and analyzed** for anomalies, leveraging **AI-driven detection** systems where possible. Additionally, researchers should be trained in **secure coding** practices and the **responsible handling of biological data**, including **anonymization** and **pseudonymization** techniques to **reduce privacy risks** in human subject research.

#### 3.3.4.3 References

- **FAIR** Data Principles<sup>117</sup> (Findable, Accessible, Interoperable, Reusable)
- **GA4GH**<sup>118</sup> (Global Alliance for Genomics and Health) Security Recommendations
- **ISO 27017**<sup>119</sup> – Cloud Security for PII
- **NIST Cybersecurity Framework** for Genomics Data<sup>120</sup>
- **ENISA**<sup>121</sup> Report on Genomics and Health Data Security

<sup>114</sup> <https://www.genome.gov/genetics-glossary/Bioinformatics>

<sup>115</sup> <https://www.linkedin.com/pulse/new-attack-surface-when-dna-neural-nets-enter-your-threat-martins-fsyyf/>

<sup>116</sup> [https://csrc.nist.gov/glossary/term/zero\\_trust\\_architecture](https://csrc.nist.gov/glossary/term/zero_trust_architecture)

<sup>117</sup> <https://www.go-fair.org/fair-principles/>

<sup>118</sup> [https://www.ga4gh.org/work\\_stream/data-security/](https://www.ga4gh.org/work_stream/data-security/)

<sup>119</sup> <https://www.iso.org/standard/43757.html>

<sup>120</sup> <https://csrc.nist.gov/News/2023/cybersecurity-of-genomic-data-nist-ir-8432>

<sup>121</sup> <https://www.enisa.europa.eu/topics/cybersecurity-of-critical-sectors/health>

### 3.3.5 Agricultural Biotechnology

Agricultural biotechnology applies *molecular* and *genetic* tools to improve crop yield, resilience, nutritional content, and pest resistance<sup>122</sup>. These advancements are crucial for **global food security**, especially in the face of climate change and growing populations. However, the *digitization* of agricultural R&D introduces security and privacy challenges that mirror... and in some cases *exceed*... those in human biomedical research.

#### 3.3.5.1 Challenges

High-value genomic sequences of proprietary crop strains, digital models of genetic modifications, and supply chain data for seeds and agricultural inputs are **prime targets**<sup>123</sup> for *intellectual property theft*, *agro-terrorism*, and *competitive espionage*.

Unlike human biomedical data, *agricultural biotechnology* information often has **fewer explicit privacy protections** under law, meaning that security safeguards must be *contractually* and *operationally* driven rather than relying solely on regulation. The *distributed* nature of agricultural R&D<sup>124</sup>... spanning seed companies, academic research, contract labs, and government agencies... further **complicates data governance**. *Unauthorized* disclosure of genetically modified (GM) traits, pathogen resistance profiles, or novel gene constructs could **undermine years of research** investment and **disrupt market competitiveness**. Additionally, cyberattacks targeting smart agriculture IoT systems (e.g., precision irrigation, drone-assisted planting, sensor networks) can have **direct** and **immediate impacts** on food production, making them a potential target for politically motivated actors.

#### 3.3.5.2 Recommendations

Agricultural biotechnology programs should maintain **secure genomic repositories** with **strict access controls**, strong **encryption**, and **role-based permissions** to prevent unauthorized access to proprietary crop genetic sequences. **Research agreements** between collaborating entities must clearly define *data ownership*, *usage rights*, and *retention* policies, with explicit provisions for **digital security requirements**.

For IoT-enabled agricultural systems<sup>125</sup>, organizations should implement **end-to-end encryption** for *sensor* and *control communications*, along with **network segmentation**<sup>126</sup> to *isolate* operational systems from internet-facing networks. **Supply chain data** for seeds, fertilizers, and GM traits should be *monitored* for anomalies that may indicate **data tampering** or **theft**. Organizations should also participate in coordinated **vulnerability disclosure programs** for *smart* agriculture technologies, enabling researchers to report and remediate vulnerabilities before they can be exploited.

Finally, given the geopolitical and economic importance of agriculture<sup>127</sup>, agricultural biotechnology firms should engage in **threat intelligence sharing** with relevant government agencies and **industry-specific Information Sharing and Analysis Centers** (ISACs<sup>128</sup>). Proactive collaboration will help detect and mitigate emerging threats before they cause large-scale disruptions to food supply chains.

<sup>122</sup> <https://www.fda.gov/food/consumers/agricultural-biotechnology>

<sup>123</sup> <https://www.seedworld.com/us/2024/06/26/food-security-is-national-security/>

<sup>124</sup> <https://www.nature.com/articles/s41597-025-05331-y>

<sup>125</sup> <https://img1.wsimg.com/blobby/go/3ad13048-c1b5-4403-aff5-ab0dcf0c2e01/downloads/4b25c496-a069-45bc-8cdd-df1da3082d4d/The%20CISO%20and%20the%20Evolving%20IoT%20Landscape.pdf>

<sup>126</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>127</sup> <https://www.newtonim.com/uk-institutional/insights/blog/the-geopolitics-of-agriculture-and-food-2/#>

<sup>128</sup> <https://health-isac.org/>

### 3.3.5.3 References

- **FAO** – Biotechnology Applications in Agriculture<sup>129</sup>
- **OECD** – Safety and Security in Agricultural Biotechnology<sup>130</sup>
- **USDA APHIS** Regulations on Genetically Engineered Organisms<sup>131</sup>
- **ISO/TC 34**<sup>132</sup> – Food Products Standards for Traceability
- **NIST** Special Publication<sup>133</sup> on IoT Cybersecurity for Agriculture

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<sup>129</sup> <https://www.fao.org/biotechnology/en>

<sup>130</sup> <https://www.sciencedirect.com/science/article/pii/S0167779921000561>

<sup>131</sup> <https://www.aphis.usda.gov/biotechnology>

<sup>132</sup> <https://www.iso.org/committee/47858.html>

<sup>133</sup> [https://www.nist.gov/system/files/documents/2023/08/02/Recommendations%20-%20Agriculture%20NIST\\_IoT.pdf](https://www.nist.gov/system/files/documents/2023/08/02/Recommendations%20-%20Agriculture%20NIST_IoT.pdf)

### 3.4 Bioengineering

The Bioengineering industry... encompassing fields such as **biomedical** engineering, **tissue** engineering, **biomechanics**, biomedical **imaging** technology, **biomaterials**, **bionanotechnology**, and **medical device** innovation... merges biology with engineering principles to create solutions that enhance human health, environmental sustainability, and industrial processes<sup>134</sup>. Its breakthroughs often rely on the integration of advanced computing, AI, and connected devices with biological systems, generating sensitive datasets that include patient-specific medical records, device telemetry, proprietary designs, and experimental protocols.

This **convergence** of physical and digital domains exposes the industry to unique cybersecurity risks, including **theft** of intellectual property, **manipulation** of biomedical device data, and **disruption** of critical manufacturing or clinical operations. **Privacy** concerns are heightened by the handling of highly regulated personal health information and emerging biometric identifiers, while **cyber resilience** is challenged by the need to secure **embedded** systems, protect **complex** supply chains, and ensure the **integrity of safety-critical devices** that may be deployed directly in patient care. The sector must balance rapid innovation and interdisciplinary collaboration with rigorous information security and risk management to safeguard both scientific progress and public trust.

The following sections dive deeper into specific challenges and recommendations for some of the sub-industries within this industry.

#### 3.4.1 Tissue Engineering

Tissue engineering<sup>135</sup> combines biology, engineering, and materials science to develop **functional substitutes** for damaged tissues and organs. The field involves sensitive and highly valuable data, including: **patient**-derived cell line information, proprietary biomaterials **formulations**, 3D bioprinting **blueprints**, and scaffold **fabrication** processes.

##### 3.4.1.1 Challenges

These assets carry **dual risks**: **theft** of intellectual property, which can undermine competitive advantage, and **exposure** of personal health information (PHI) that may be embedded in donor cell datasets.

Cybersecurity threats in tissue engineering are compounded by the need for extensive **interdisciplinary collaboration**. Academic researchers, contract manufacturing facilities, clinical trial teams, and regulatory reviewers often **share data** across multiple networks and platforms, increasing the **attack surface**. Vulnerabilities can arise from unsecured lab equipment (e.g., bioprinters connected to the internet for remote monitoring), insufficient encryption of imaging data, or compromised file transfer methods for CAD/CAM tissue design files. Additionally, some tissue engineering systems are **connected to operational technology (OT)** environments for automated manufacturing... making them susceptible to both traditional IT attacks and industrial control system (ICS) threats.

##### 3.4.1.2 Recommendations

Organizations engaged in tissue engineering should implement **segmented network** environments<sup>136</sup>, isolating **research** systems from **production manufacturing** controls and **internet-facing** networks. Sensitive design files and experimental data should be stored in **encrypted repositories**, with **multifactor authentication (MFA)** required for all access. **File integrity monitoring** should be deployed to detect any unauthorized modifications to scaffold or tissue blueprints.

**Collaboration platforms** must be **vetted for compliance** with both information security and **regulatory** requirements... especially in **cross-border** research projects where PHI or donor genetic data is involved. **Data sharing agreements** should define **administrative safeguards** such as **retention**, **destruction**, and **breach notification**

<sup>134</sup> <https://www.sciencedirect.com/topics/engineering/biomedical-engineering>

<sup>135</sup> [https://en.wikipedia.org/wiki/Tissue\\_engineering](https://en.wikipedia.org/wiki/Tissue_engineering)

<sup>136</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

procedures, and incorporate **technical safeguards** such as *secure file transfer protocols (SFTP)* or *zero-trust network access (ZTNA)*<sup>137</sup>.

To counter industrial espionage risks, tissue engineering organizations should join industry-specific information-sharing programs such as the **Bioeconomy Information Sharing and Analysis Center (BIO-ISAC)**<sup>138</sup>. Additionally, organizations should conduct red-team simulations targeting both cyber and physical aspects of their operations, ensuring resilience against advanced persistent threats (APTs) that may combine cyber intrusion with theft of physical prototypes or biomaterial samples.

#### 3.4.1.3 References

- **NIH**<sup>139</sup> – Regenerative Medicine and Tissue Engineering Initiatives
- **ISO 10993**<sup>140</sup> – Biological Evaluation of Medical Devices
- **NIST SP 800-171**<sup>141</sup> – Protecting Controlled Unclassified Information in Nonfederal Systems
- **FDA Guidance**<sup>142</sup> on Human Cells, Tissues, and Cellular/Tissue-Based Products (HCT/PS)
- **IEEE Standards**<sup>143</sup> on Bioprinting and Medical Device Interoperability

<sup>137</sup> <https://www.techtarget.com/searchnetworking/tip/The-basics-of-zero-trust-network-access-explained>

<sup>138</sup> <https://www.isac.bio/>

<sup>139</sup> <https://www.nidcr.nih.gov/grants-funding/grant-programs/tissue-engineering-regenerative-medicine>

<sup>140</sup> <https://www.iso.org/standard/68936.html>

<sup>141</sup> <https://csrc.nist.gov/pubs/sp/800/171/r2/upd1/final>

<sup>142</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/regulation-human-cells-tissues-and-cellular-and-tissue-based-products-hctps-small-entity-compliance>

<sup>143</sup> <https://standards.ieee.org/wp-content/uploads/import/documents/other/ehealth.pdf>



### 3.4.2 Biomechanics

Biomechanics<sup>144</sup> applies principles of **mechanical engineering**, **physics**, and **materials science** to understand and enhance the *function* of biological systems. This field spans **prosthetics design**, **orthopedic implants**, **rehabilitation robotics**, and **sports performance optimization**. *Sensitive data* in biomechanics research can include **proprietary** CAD models for medical devices, force-distribution **analysis** for implantable components, gait and motion capture **datasets**, and **patient-specific** anatomical **models** derived from MRI or CT imaging.

#### 3.4.2.1 Challenges

Because biomechanics frequently requires integrating **experimental data** from motion labs, imaging centers, and manufacturing partners, the field's IT footprint can be *distributed* and *complex*. Risks include **interception** of unencrypted imaging data during transfer, **compromise** of computational simulations stored in cloud environments, and **insider threats** from individuals with authorized access to *prototype designs*. Internet-connected laboratory equipment, such as robotic testing rigs, may also present vulnerabilities if security patches and authentication mechanisms are not rigorously applied. Additionally, biomechanics **research** often *intersects* with regulated medical **device development**, meaning organizations face *dual compliance demands* under both engineering safety standards and healthcare privacy frameworks such as HIPAA and GDPR.

#### 3.4.2.2 Recommendations

Organizations should adopt **secure product lifecycle management (PLM)** systems to track biomechanics **project data** from concept through production, ensuring **role-based access control** and version integrity checks. For highly sensitive design and simulation files, **encryption** should be enforced both at rest and in transit, with **access logged** and regularly **audited**. Biomechanics research teams should also implement **endpoint detection and response (EDR)** tools on all systems used for device modeling or data processing, to detect potential compromise early.

Cross-institutional biomechanics collaborations should leverage **federated identity management**<sup>145</sup> solutions to grant secure access without creating unmanaged local accounts. Where biomechanics research *overlaps* with regulated medical device development, organizations should integrate **cybersecurity risk assessment** directly into product **safety reviews**, aligning with both **ISO 14971**<sup>146</sup> (Risk Management for Medical Devices) and applicable privacy requirements.

Finally, to protect against **industrial espionage** and **counterfeiting** of device designs, biomechanics organizations should apply **watermarking**<sup>147</sup> or **digital rights management (DRM)**<sup>148</sup> to shared CAD models. Partnerships with supply chain entities, such as contract manufacturers producing prototype components... should include robust vendor **risk assessments** and **contractual obligations** for securing all shared intellectual property.

#### 3.4.2.3 References

- **ISO 13485**<sup>149</sup> – Medical Devices Quality Management Systems
- **IEC 60601**<sup>150</sup> – Medical Electrical Equipment Safety Standards
- **FDA Guidance for Industry** – Applying Human Factors and Usability Engineering to Medical Devices<sup>151</sup>

<sup>144</sup> <https://biomechanist.net/what-is-biomechanics/>

<sup>145</sup> [https://en.wikipedia.org/wiki/Federated\\_identity](https://en.wikipedia.org/wiki/Federated_identity)

<sup>146</sup> <https://www.iso.org/standard/72704.html>

<sup>147</sup> [https://en.wikipedia.org/wiki/Digital\\_watermarking](https://en.wikipedia.org/wiki/Digital_watermarking)

<sup>148</sup> [https://en.wikipedia.org/wiki/Digital\\_rights\\_management](https://en.wikipedia.org/wiki/Digital_rights_management)

<sup>149</sup> <https://www.iso.org/standard/59752.html>

<sup>150</sup> <https://www.iso.org/standard/65529.html>

<sup>151</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/applying-human-factors-and-usability-engineering-medical-devices>



- NIST Cybersecurity Framework (CSF)<sup>152</sup>
- HIPAA Security Rule<sup>153</sup>
- GDPR Article 32 (Security of Processing)

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<sup>152</sup> <https://www.nist.gov/cyberframework>

<sup>153</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

### 3.4.3 Biomedical Imaging Technology

Biomedical imaging technology encompasses modalities such as MRI, CT, PET, ultrasound, optical coherence tomography, and emerging molecular imaging techniques. These systems generate large volumes of sensitive patient data, including identifiable medical images, which fall squarely under protected health information (PHI) in jurisdictions like the U.S. (HIPAA) and the EU (GDPR). Beyond patient privacy, these systems also store and process proprietary imaging algorithms, AI-based diagnostic models, and specialized acquisition protocols that are valuable intellectual property for manufacturers and research institutions.

#### 3.4.3.1 Challenges

The attack surface is broad: imaging modalities are increasingly network-connected for remote diagnostics, cloud storage, and AI-assisted interpretation. Vulnerabilities may arise from outdated device firmware, insecure **DICOM (Digital Imaging and Communications in Medicine)**<sup>154</sup> protocol configurations, or unencrypted transmission of imaging data. The DICOM standard<sup>155</sup>, while widely adopted, historically lacked native encryption and authentication, making it susceptible to interception or manipulation if not paired with secure transport layers. Additionally, imaging systems often run on embedded or legacy operating systems that are difficult to patch without disrupting clinical operations... leaving them exposed to known exploits.

#### 3.4.3.2 Recommendations

Healthcare and research organizations should ensure that all biomedical imaging devices are included in asset inventories with documented firmware and operating system versions, patch history, and network topology. Network segmentation<sup>156</sup> should isolate imaging systems from general IT networks, with firewall rules restricting inbound and outbound connections to only those essential for operations. Imaging data transfers should use TLS-secured DICOM connections or equivalent encrypted channels, with mutual authentication to verify endpoints.

For AI-assisted imaging workflows, model training and inference environments must be hardened with strict access controls and audit trails. Proprietary imaging algorithms should be encrypted at rest and in motion, with **secure development lifecycle (SDLC)**<sup>157</sup> processes applied to any in-house software. Vendors should be contractually required to provide timely security patches and vulnerability disclosures, and organizations should integrate these into their broader medical device patch management program.

Finally, biomedical imaging teams should participate in coordinated vulnerability disclosure programs and relevant ISACs (e.g., Health-ISAC<sup>158</sup>) to stay informed of emerging threats targeting imaging modalities. Regular penetration testing... including DICOM network security assessments... will help validate that controls are functioning as intended and identify gaps before they are exploited.

#### 3.4.3.3 References

- **DICOM**<sup>159</sup> Standard Security Profiles<sup>160</sup>
- **NEMA**<sup>161</sup> Cybersecurity Technical Report for Medical Imaging Devices

<sup>154</sup> <https://dicom.nema.org>

<sup>155</sup> <https://www.dicomstandard.org>

<sup>156</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>157</sup> <https://www.eccouncil.org/cybersecurity-exchange/application-security/what-are-the-five-phases-of-the-secure-software-development-life-cycle/>

<sup>158</sup> <https://health-isac.org/>

<sup>159</sup> <https://dicom.nema.org>

<sup>160</sup> [https://dicom.nema.org/medical/dicom/current/output/chtml/part02/sect\\_7.6.html](https://dicom.nema.org/medical/dicom/current/output/chtml/part02/sect_7.6.html)

<sup>161</sup> <https://www.nema.org>

- **ISO/IEC 27001**<sup>162</sup> – Information Security Management Systems
- **NIST SP 1800-24**<sup>163</sup> – Securing Picture Archiving and Communication Systems (PACS)
- **FDA Guidance**<sup>164</sup> on the Content of Premarket Submissions for Management of Cybersecurity in Medical Devices

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<sup>162</sup> <https://www.iso.org/standard/27001>

<sup>163</sup> <https://csrc.nist.gov/pubs/sp/1800/24/ipd>

<sup>164</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cybersecurity-medical-devices-quality-system-considerations-and-content-premarket-submissions>

## 3.5 Environmental & Ecological Life Sciences

The Environmental & Ecological Life Sciences industry... covering disciplines such as environmental biology, ecology, conservation science, climate research, and biodiversity monitoring... focuses on understanding and protecting natural ecosystems while addressing global challenges like climate change, habitat loss, and species decline.

Organizations in this industry often operate large-scale research programs involving environmental sensors, satellite imaging, GIS mapping, and genomic biodiversity data, much of which is sensitive due to its links to endangered species locations, natural resource reserves, or proprietary environmental impact assessments. These datasets can be targeted by cybercriminals, activists, or state-sponsored actors seeking to manipulate scientific findings, disrupt conservation efforts, or gain economic advantage through resource exploitation.

Key information security and privacy challenges include safeguarding sensitive geospatial data, maintaining integrity in long-term environmental datasets, securing IoT-based field equipment deployed in remote or hostile environments, and protecting collaborative research networks that span international jurisdictions.

Cyber resilience is further tested by the industry's reliance on open data-sharing frameworks, decentralized research teams, and legacy monitoring infrastructure, all of which must be secured without undermining scientific collaboration or public engagement.

The following sections dive deeper into specific challenges and recommendations for some of the sub-industries within this industry.

### 3.5.1 Marine Biology

Marine Biology research produces diverse datasets... satellite oceanographic imagery, acoustic recordings, DNA barcoding of marine species, and ecological survey data. These datasets are valuable for conservation planning, fisheries management, and climate change modeling. However, they can also be exploited for illegal fishing, environmental exploitation, or competitive advantage in resource mapping (e.g., seabed mining locations). Sensitive geolocation data of endangered species, if exposed, can directly endanger conservation efforts by facilitating poaching or habitat disturbance.

#### 3.5.1.1 Challenges

Marine biology projects often rely on remote sensing platforms, autonomous underwater vehicles (AUVs), and IoT-enabled buoys for data collection. These systems are frequently deployed in remote environments and connect via satellite or long-range radio, which may lack modern encryption. Without secure telemetry and data storage, there is a risk of interception, manipulation, or destruction of data before it reaches research facilities. Additionally, marine biology datasets are often shared internationally, raising data sovereignty and intellectual property concerns across jurisdictions.

#### 3.5.1.2 Recommendations

Marine biology research programs should classify and protect sensitive geospatial datasets, especially those involving endangered species habitats, using encryption and controlled distribution. Telemetry systems on AUVs and sensor platforms should implement end-to-end encryption and authenticated communication protocols to prevent interception or spoofing.

International data-sharing agreements should define acceptable uses, storage requirements, and access restrictions for shared datasets. Organizations should also implement **network segmentation**<sup>165</sup> for shore-based receiving stations and perform routine vulnerability assessments of field-deployed devices. Leveraging blockchain or

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<sup>165</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

distributed ledger technology for data provenance can enhance trust in multi-party collaborations by ensuring data integrity and authenticity from point of collection to final analysis.

### 3.5.1.3 References

- **UNESCO** Oceanographic Data Exchange Policy<sup>166</sup>
- **FAO Code of Conduct** for Responsible Fisheries<sup>167</sup>
- **ISO/TC 8**<sup>168</sup> – Ships and Marine Technology Standards
- **NIST IoT Cybersecurity Guidelines**<sup>169</sup>
- **Convention on Biological Diversity (CBD)**<sup>170</sup> – Marine Biodiversity Protocols

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<sup>166</sup> <https://iode.org/>

<sup>167</sup> <https://www.fao.org/responsible-fishing/resources/detail/en/c/1316854/>

<sup>168</sup> <https://www.iso.org/committee/45776.html>

<sup>169</sup> <https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-213.pdf>

<sup>170</sup> <https://www.cbd.int/doc/legal/cbd-en.pdf>

### 3.5.2 Environmental Microbiology

Environmental microbiology studies microorganisms in soil, water, and other ecosystems, often generating genetic sequence data and environmental health assessments. These datasets can inform environmental remediation, pollution tracking, and climate adaptation strategies. However, as with biomedical microbiology, there are biosecurity concerns if datasets include genomic sequences of harmful organisms or antibiotic resistance genes that could be exploited.

#### 3.5.2.1 Challenges

IoT-enabled environmental sensors and remote lab stations collecting microbial data are increasingly network-connected, making them vulnerable to cyber intrusion. Interception or tampering could alter environmental risk assessments or disrupt monitoring programs. **Cross-border** collaborations add further complexity, as microbial samples or data may be subject to biodiversity treaties like the **Nagoya Protocol**<sup>171</sup>, requiring secure handling and equitable benefit-sharing.

#### 3.5.2.2 Recommendations

Secure storage and controlled access to microbial genomic data are essential, with encryption and multi-factor authentication applied to all research platforms. Field-deployed devices should use hardened firmware and support secure communication channels to prevent man-in-the-middle attacks.

Data governance policies should integrate biosecurity review for any genetic information related to potentially harmful organisms, and compliance mechanisms should be in place for biodiversity-related regulations. Researchers should implement checksum verification for environmental datasets and maintain audit trails for sample collection, processing, and sharing activities.

#### 3.5.2.3 References

- **Nagoya Protocol**<sup>172</sup> on Access and Benefit Sharing
- **ISO/IEC 27001**<sup>173</sup> – Information Security Management Systems
- **WHO** Biosafety Guidelines<sup>174</sup>
- **NIST SP 800-53**<sup>175</sup> – Security and Privacy Controls
- **OECD** Biosecurity Principles<sup>176</sup>

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<sup>171</sup> <https://www.cbd.int/abs/default.shtml>

<sup>172</sup> <https://www.cbd.int/abs/default.shtml>

<sup>173</sup> <https://www.iso.org/standard/27001>

<sup>174</sup> <https://www.who.int/publications/i/item/9789240011311>

<sup>175</sup> <https://csrc.nist.gov/pubs/sp/800/53/r5/upd1/final>

<sup>176</sup> <https://www.oecd.org/en/about/programmes/oecd-programme-on-chemical-safety-and-biosafety.html>

### 3.5.3 Conservation Biology

Conservation biology focuses on protecting species, habitats, and ecosystems. The security and privacy risks here are tied to sensitive ecological data... species population locations, breeding site coordinates, anti-poaching patrol routes... which can be exploited by illegal loggers, miners, and poachers if exposed. The use of drones, camera traps, and satellite imaging has enhanced data collection but has also expanded the attack surface for environmental monitoring systems.

#### 3.5.3.1 Challenges

Cloud-based platforms now store vast archives of high-resolution imagery and tracking data. Weak access controls or poor configuration can lead to unintended public exposure of critical conservation intelligence. Additionally, NGOs and research institutions often operate with limited cybersecurity budgets, making them soft targets for motivated adversaries, including those seeking to undermine environmental enforcement or policy advocacy.

#### 3.5.3.2 Recommendations

Conservation organizations should adopt a “classified data” approach for sensitive species location information, restricting dissemination even within conservation networks. Field devices (e.g., GPS trackers, drones) should be configured to encrypt stored and transmitted data, with access keys rotated regularly.

Cloud-based conservation data repositories must have clearly defined access tiers and default privacy settings locked down. Organizations should participate in **threat intelligence sharing** specific to environmental protection and **train** staff in **operational security (OPSEC)** to prevent accidental disclosure of sensitive field data. Partner agreements should require that all collaborating entities maintain equivalent security standards to prevent weakest-link exploitation.

#### 3.5.3.3 References

- **CITES** – Convention on International Trade in Endangered Species<sup>177</sup>
- **IUCN Guidelines** for Conservation Data Management<sup>178</sup>
- **ISO 19115**<sup>179</sup> – Geographic Information Metadata
- **FAIR Principles**<sup>180</sup> for Environmental Data
- **NIST Cybersecurity Framework (CSF)**<sup>181</sup>

<sup>177</sup> <https://cites.org/eng/disc/what.php>

<sup>178</sup> <https://www.iucnredlist.org/resources/redlistguidelines>

<sup>179</sup> <https://www.iso.org/standard/53798.html>

<sup>180</sup> <https://www.go-fair.org/fair-principles/>

<sup>181</sup> <https://www.nist.gov/cyberframework>



## 3.6 Life Sciences Industry Group-Specific Recommendations

There are some fundamental information security, privacy, and cyber resilience concepts which apply across most of the Life Sciences Industry. The following sections describe 5 or 6 of these concepts which would provide a solid foundation for risk management within any organization operating within this industry.

### 3.6.1 Strengthen Governance & Compliance Across All Subdomains

Life sciences organizations must implement formalized information security governance frameworks, aligning with globally recognized standards such as **ISO/IEC 27001**<sup>182</sup>, the **NIST Cybersecurity Framework (CSF)**<sup>183</sup>, and industry-specific guidelines like **ISO 20387**<sup>184</sup> for **biobanking**. Governance should integrate risk management, data classification, and compliance tracking for diverse regulatory landscapes including **GDPR**, **HIPAA**, **Nagoya Protocol**<sup>185</sup>, and biosecurity treaties. A single cross-functional governance committee... spanning research, legal, compliance, and IT... should oversee data security and privacy policies across biological sciences, biotechnology, bioengineering, and environmental research.

### 3.6.2 Secure High-Value Research Data and Intellectual Property

Proprietary genetic sequences, bioinformatics models, laboratory imaging datasets, and experimental blueprints represent critical intellectual property. All such assets should be encrypted in transit and at rest, stored in secure repositories with **role-based access controls** and **multi-factor authentication**. Implement **data loss prevention (DLP)** technologies to detect and block unauthorized sharing. For **cross-border** collaborations, establish robust contractual data transfer agreements that define encryption standards, data residency requirements, and **breach notification** protocols.

### 3.6.3 Harden Laboratory & Field Research Systems

Research infrastructure... including connected lab equipment, imaging systems, IoT sensors, drones, and automated bioprinters... should be inventoried, **segmented** on secure VLANs<sup>186</sup>, and patched promptly using vendor-signed updates. Access to lab instruments must be authenticated and logged, with session monitoring for anomalous activity. Field-deployed devices for environmental and ecological research should use **end-to-end encrypted telemetry** and integrity checks (e.g., cryptographic hashes) for incoming datasets.

### 3.6.4 Address Biosecurity & Ethical Risks Proactively

Life sciences research often involves dual-use data and methods. Establish **biosecurity review boards** to evaluate projects for potential misuse risks, such as genome editing in pathogens or high-risk synthetic biology constructs. Adopt voluntary adherence to global codes of conduct... such as those from the **World Health Organization** and **OECD**... to address gaps where national regulations lag behind technological capabilities. Embed ethical and cultural sensitivity considerations into genetic resource usage, especially for indigenous or ecologically sensitive datasets.

### 3.6.5 Enhance Collaboration Security in Multinational Research

Global research partnerships are a hallmark of life sciences innovation but introduce complex security and privacy risks. All collaborative platforms (LIMS, ELNs, bioinformatics pipelines) must support **federated identity management**<sup>187</sup>, fine-grained access control, and auditable logs. Sensitive datasets should be shared through secure,

<sup>182</sup> <https://www.iso.org/standard/27001>

<sup>183</sup> <https://www.nist.gov/cyberframework>

<sup>184</sup> <https://www.iso.org/standard/67888.html>

<sup>185</sup> <https://www.cbd.int/abs/default.shtml>

<sup>186</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>187</sup> [https://en.wikipedia.org/wiki/Federated\\_identity](https://en.wikipedia.org/wiki/Federated_identity)

access-controlled channels with **watermarking**<sup>188</sup> or usage tracking. When possible, employ **privacy-preserving computation techniques** (e.g., secure multi-party computation, homomorphic encryption) to enable collaborative analysis without exposing raw sensitive data.

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<sup>188</sup> [https://en.wikipedia.org/wiki/Digital\\_watermarking](https://en.wikipedia.org/wiki/Digital_watermarking)

## 4 Biomedical Industry Group

The biomedical industry spans the continuum from early-stage medical research to the engineering and deployment of sophisticated diagnostics, devices, and regenerative medicine solutions. While its mission is to improve health outcomes and save lives, the industry's growing reliance on interconnected systems, cloud-based research platforms, and international collaborations has expanded its exposure to cyber and privacy risks. Biomedical organizations hold a unique blend of assets: patient data from clinical trials, intellectual property tied to breakthrough devices or therapies, and operational technology that directly supports life-critical functions. Each of these carries different but equally severe implications if compromised.

### 4.1 Industry Group-Specific Challenges

One of the industry's defining challenges is the **integration of patient data into the research and development lifecycle**. Translational medicine, preclinical work, and clinical trials require the collection, storage, and processing of sensitive health information. This data is not only valuable for its scientific and commercial implications but is also subject to stringent privacy laws such as **HIPAA**, **GDPR**, **PIPEDA**, and regional equivalents. Breaches can trigger regulatory investigations, jeopardize trial integrity, and erode public trust.

Biomedical engineering introduces additional complexity. Medical devices... whether diagnostic, therapeutic, or assistive... often combine embedded software, wireless connectivity, and remote monitoring. Vulnerabilities in these devices can be exploited not just to steal data but to alter functionality, potentially endangering patients. The **FDA**, **ISO 13485**<sup>189</sup>, and other regulators have responded with stronger device cybersecurity requirements, but ensuring compliance across diverse product lines and international markets remains a significant operational challenge.

Finally, the biomedical industry is uniquely dependent on **multi-party collaboration**. Universities, hospitals, CROs, CDMOs<sup>190</sup>, and technology vendors work together across borders, often sharing large datasets and connecting research environments through APIs and data exchange platforms. Without robust vendor risk management, these integrations can become the weak link in an otherwise well-defended enterprise. The increasing use of AI in diagnostics, digital health applications, and personalized medicine further complicates the threat landscape by introducing algorithmic transparency, bias, and data lineage concerns into the security and privacy conversation.

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<sup>189</sup> <https://www.iso.org/standard/59752.html>

<sup>190</sup> [https://en.wikipedia.org/wiki/Contract\\_manufacturing\\_organization](https://en.wikipedia.org/wiki/Contract_manufacturing_organization)

## 4.2 Medical Research & Development

The Medical Research and Development (R&D) industry... encompassing academic institutions, private laboratories, clinical research organizations, and pharmaceutical R&D divisions... drives innovation in diagnostics, therapeutics, vaccines, and medical technologies through rigorous scientific investigation, translation medicine, preclinical research, and clinical trials.

This work produces and depends on vast stores of sensitive data, including patient health records, genomic information, trial results, proprietary formulas, and pre-market product designs. The sector is a prime target for cyber adversaries seeking to steal intellectual property, manipulate research outcomes, or disrupt time-critical development pipelines, especially during public health crises.

Key information security and privacy challenges include protecting regulated health data under laws such as HIPAA and GDPR, securing multi-site and **cross-border** research collaborations, ensuring data integrity in both clinical and preclinical phases, and defending specialized laboratory systems that often lack modern security controls.

Cyber resilience is further complicated by the need to maintain uninterrupted research operations, safeguard against supply chain vulnerabilities, and protect digital assets while meeting aggressive innovation timelines that leave little margin for protracted security interventions.

The following sections dive deeper into specific challenges and recommendations for some of the sub-industries within this industry.

### 4.2.1 Translational Medicine

Translational Medicine *bridges the gap* between *laboratory discoveries* and their *application in clinical settings*. It integrates basic science findings with patient-oriented research to accelerate the development of new diagnostics, therapies, and preventive strategies.

#### 4.2.1.1 Challenges

The security and privacy challenges here are multifaceted: translational research often involves merging preclinical datasets (animal models, in vitro experiments) with sensitive human clinical data, creating rich, high-value datasets that are both scientifically essential and privacy-sensitive.

Large-scale collaborations across universities, hospitals, biopharma companies, and government agencies add complexity. Data moves between diverse IT environments with different security postures, increasing the potential for exposure. Research systems may include laboratory information management systems (LIMS), biostatistics servers, genomic data repositories, and clinical trial management systems (CTMS), each of which can be targeted to steal intellectual property or breach protected health information (PHI). Cyberattacks in this space can undermine regulatory submissions, disrupt trial timelines, and erode investor confidence.

Another persistent challenge is compliance across jurisdictions. Translational projects may need to navigate **HIPAA** and **HITECH** in the United States, **GDPR** in the European Union, and other national regulations for medical data, all while adhering to good clinical practice (GCP)<sup>191</sup> and data integrity requirements from the **FDA**, **EMA**, and **ICH**. Differing interpretations of “personal data” and varied requirements for **anonymization** or **pseudonymization** complicate **cross-border** sharing of patient-derived data.

#### 4.2.1.2 Recommendations

Translational medicine programs should adopt an **end-to-end data governance framework** that treats security and privacy as integral to the research lifecycle. This includes:

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<sup>191</sup> [https://database.ich.org/sites/default/files/E6\\_R2\\_Addendum.pdf](https://database.ich.org/sites/default/files/E6_R2_Addendum.pdf)

- **Data Classification & Segmentation:** Identify and label datasets by sensitivity and regulatory requirement, separating PHI from preclinical data when possible.
- **Controlled Collaboration Platforms:** Use secure research platforms with **federated identity management**<sup>192</sup> and role-based access, ensuring collaborators see only what's necessary for their role.
- **Encryption & Authentication:** Enforce encryption in transit and at rest, and require multi-factor authentication for all systems containing sensitive or regulated data.
- **Regulatory Alignment:** Maintain compliance mappings for each jurisdiction involved, with built-in workflows for obtaining consent, documenting data provenance, and ensuring legal **cross-border** transfers.
- **Vendor Risk Management:** Assess CROs, cloud providers, and analytics vendors for compliance readiness and cybersecurity maturity, with contracts mandating breach reporting and security controls.

Regular security audits, penetration testing of research systems, and incident response exercises tailored to research workflows should be standard. To balance security with the industry's need for rapid innovation, organizations should employ **privacy-preserving computation techniques**... such as homomorphic encryption or secure multiparty computation... allowing collaborative analysis without exposing underlying PHI.

#### 4.2.1.3 References

- **ICH E6 (R2)**<sup>193</sup> – Good Clinical Practice Guidelines
- **FDA** Guidance on Electronic Source Data in Clinical Investigations<sup>194</sup>
- **EMA** Reflection Papers<sup>195</sup> discussing Data Integrity
- **HIPAA** Privacy<sup>196</sup> and Security<sup>197</sup> Rules
- **GDPR – Articles 5**<sup>198</sup>, **9**<sup>199</sup>, and **32**<sup>200</sup> on data protection principles, processing of health data, and security measures

<sup>192</sup> [https://en.wikipedia.org/wiki/Federated\\_identity](https://en.wikipedia.org/wiki/Federated_identity)

<sup>193</sup> [https://database.ich.org/sites/default/files/E6\\_R2\\_Addendum.pdf](https://database.ich.org/sites/default/files/E6_R2_Addendum.pdf)

<sup>194</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/electronic-source-data-clinical-investigations>

<sup>195</sup> [https://www.ema.europa.eu/en/documents/regulatory-procedural-guideline/guideline-computerised-systems-and-electronic-data-clinical-trials\\_en.pdf](https://www.ema.europa.eu/en/documents/regulatory-procedural-guideline/guideline-computerised-systems-and-electronic-data-clinical-trials_en.pdf)

<sup>196</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>197</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>198</sup> <https://gdpr-info.eu/art-5-gdpr/>

<sup>199</sup> <https://gdpr.eu/article-9-processing-special-categories-of-personal-data-prohibited/>

<sup>200</sup> <https://gdpr-info.eu/art-32-gdpr/>

## 4.2.2 Preclinical Research

Preclinical Research **bridges** the **conceptual stage** of drug or device development and **first-in-human trials**. It involves laboratory experiments, in vitro studies, and in vivo animal models to evaluate efficacy, pharmacokinetics, toxicity, and safety. These projects generate sensitive datasets that include proprietary formulations, molecular targets, high-throughput screening results, and animal study data... all of which are valuable intellectual property and potential targets for corporate espionage or nation-state theft.

### 4.2.2.1 Challenges

Cybersecurity risks include unauthorized access to lab automation systems, robotic screening platforms, and analytical instruments that are increasingly integrated with networked Laboratory Information Management Systems (LIMS) or Electronic Lab Notebooks (ELNs). Data integrity is also critical: manipulated preclinical data could lead to flawed go/no-go decisions, misinformed regulatory submissions, or dangerous downstream effects in clinical trials. Intellectual property leakage at this stage is particularly damaging, as it can occur before patents are filed, leaving innovations legally unprotected.

Globalized research adds another layer of complexity. CROs, academic collaborators, and technology vendors often span multiple jurisdictions, meaning that preclinical data handling must meet the most stringent applicable standards. While personal health data may be limited in this stage, privacy laws still apply when using human-derived cell lines or genetic material. Compliance with biosecurity protocols... especially for work with potentially hazardous compounds or organisms... is essential to prevent misuse.

### 4.2.2.2 Recommendations

Preclinical research programs should adopt a **segmented network architecture**<sup>201</sup> that isolates laboratory systems from corporate IT networks, with controlled gateways for data transfer. All LIMS and ELN platforms must be configured with role-based access controls, strong authentication, and encrypted storage for sensitive datasets. Critical instruments should run on hardened firmware, and vendor-supplied patches must be applied promptly after security testing.

To protect intellectual property, organizations should maintain a “patent-first” strategy for major innovations, coupled with secure **digital rights management (DRM)**<sup>202</sup> for any shared design files or research outputs. When outsourcing to CROs, contracts must mandate adherence to GLP, security standards, and prompt breach reporting. Supply chain vetting is equally important... laboratory reagents, animal models, and specialized software should be sourced from verified, reputable suppliers to reduce the risk of embedded compromise.

Finally, preclinical teams should conduct regular data integrity audits, using hash-based verification and audit trails to ensure that results have not been altered. Security awareness training should be tailored to lab personnel, covering cyber hygiene, physical access controls, and procedures for reporting anomalies. This combination of technical, procedural, and contractual controls ensures that preclinical work advances securely toward the clinical trial stage without compromising scientific validity or competitive advantage.

### 4.2.2.3 References

- **OECD** Principles of Good Laboratory Practice (GLP)<sup>203</sup>
- **FDA** Guidance for Industry<sup>204</sup> – Good Laboratory Practice Regulations

<sup>201</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>202</sup> [https://en.wikipedia.org/wiki/Digital\\_rights\\_management](https://en.wikipedia.org/wiki/Digital_rights_management)

<sup>203</sup> [https://www.oecd.org/en/publications/1998/01/oecd-principles-on-good-laboratory-practice\\_g1gh32e8.html](https://www.oecd.org/en/publications/1998/01/oecd-principles-on-good-laboratory-practice_g1gh32e8.html)

<sup>204</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/good-laboratory-practice-regulations-management-briefings-post-conference-report-aug-1979>

- **ISO/IEC 27001**<sup>205</sup> – Information Security Management Systems
- **NIST SP 800-171**<sup>206</sup> – Protecting Controlled Unclassified Information
- **OECD Biosecurity Guidelines**<sup>207</sup>

### 4.2.3 Clinical Trials (Phase I–IV)

Clinical trials are a cornerstone of biomedical innovation, moving candidate therapies and devices from preclinical promise to validated clinical use. Across all phases—Phase I (safety), Phase II (efficacy), Phase III (comparative effectiveness), and Phase IV (post-market surveillance)—security and privacy risks are especially acute because these studies involve real patient participants, sensitive health data, and critical endpoints that inform regulatory approval.

#### 4.2.3.1 Challenges

Trial datasets typically include PHI, genetic information, lab results, imaging data, and detailed medical histories, making them prime targets for both cybercriminals and nation-state actors seeking high-value data.

The complexity of modern trials heightens the threat surface. Multi-site studies involve hospitals, clinics, CROs, electronic data capture (EDC) systems, wearable health devices, and laboratory networks. Each integration point represents a potential vulnerability. Cloud-based trial management platforms and remote monitoring tools improve efficiency but also introduce the risk of data breaches if improperly configured or secured. Cyber incidents in the clinical trial phase can lead to data integrity issues, regulatory delays, loss of participant trust, and even trial suspension.

Global trials also face regulatory and jurisdictional challenges. Data collected in the EU may fall under **GDPR**, while data from U.S. sites is subject to **HIPAA**, and data from certain APAC regions may be governed by country-specific laws such as Japan’s Act on the Protection of Personal Information (APPI) or Singapore’s PDPA. Ensuring compliant **cross-border** transfer, harmonized consent processes, and consistent security controls across all jurisdictions is a complex operational undertaking.

#### 4.2.3.2 Recommendations

Clinical trial sponsors and CROs should adopt **risk-based quality management systems** that integrate security and privacy controls into the trial lifecycle from protocol development through post-trial data archiving. Key measures include:

- **Role-Based Access & Authentication:** Limit access to trial data to authorized study personnel, enforce multi-factor authentication, and review access logs regularly.
- **Data Encryption & Integrity:** Encrypt PHI and trial data both in transit and at rest; implement digital signatures or hash-based verification to ensure datasets remain unaltered.
- **Secure EDC & Monitoring Platforms:** Validate and secure EDC systems against OWASP vulnerabilities, and require vendors to maintain documented compliance with GCP and applicable data protection laws.
- **Wearable Device Security:** For trials using connected health devices, ensure that firmware is signed, communications are encrypted, and patient-facing apps are penetration-tested.
- **Vendor Risk & Compliance Oversight:** Include clear contractual obligations for CROs, labs, and data processors regarding **breach notification**, incident response, and audit rights.

<sup>205</sup> <https://www.iso.org/standard/27001>

<sup>206</sup> <https://csrc.nist.gov/pubs/sp/800/171/r2/upd1/final>

<sup>207</sup> <https://www.oecd.org/en/about/programmes/oecd-programme-on-chemical-safety-and-biosafety.html>

Sponsors should also maintain a comprehensive **incident response plan**<sup>208</sup> *tailored* to trial operations, conduct **periodic table-top simulations** involving site coordinators and data managers, and ensure that participant communication plans are in place in case of a breach. Where possible, trial designs should incorporate **privacy-by-design**<sup>209</sup> methodologies, *minimizing* identifiable data collection while still meeting scientific and regulatory requirements.

#### 4.2.3.3 References

- **ICH E6 (R2)**<sup>210</sup> Good Clinical Practice (GCP) Guidelines
- **FDA** Guidance on Electronic Records and Signatures (21 CFR Part 11)<sup>211</sup>
- **EMA** Reflection Paper on Risk-Based Quality Management in Clinical Trials<sup>212</sup>
- **HIPAA** Security<sup>213</sup> and Privacy<sup>214</sup> Rules
- **GDPR** – Special Categories<sup>215</sup> Data Protections

<sup>208</sup> [https://www.cisa.gov/sites/default/files/publications/Incident-Response-Plan-Basics\\_508c.pdf](https://www.cisa.gov/sites/default/files/publications/Incident-Response-Plan-Basics_508c.pdf)

<sup>209</sup> [https://en.wikipedia.org/wiki/Privacy\\_by\\_design](https://en.wikipedia.org/wiki/Privacy_by_design)

<sup>210</sup> [https://database.ich.org/sites/default/files/E6\\_R2\\_Addendum.pdf](https://database.ich.org/sites/default/files/E6_R2_Addendum.pdf)

<sup>211</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/part-11-electronic-records-electronic-signatures-scope-and-application>

<sup>212</sup> [https://media.tghn.org/articles/EMA\\_-\\_paper\\_on\\_risk\\_quality\\_management\\_of\\_trials.pdf](https://media.tghn.org/articles/EMA_-_paper_on_risk_quality_management_of_trials.pdf)

<sup>213</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>214</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>215</sup> <https://gdpr-info.eu/art-9-gdpr/>



## 4.3 Biomedical Engineering

The Biomedical Engineering industry... spanning the design and development of medical devices, diagnostic equipment, prosthetics, implantable systems, and healthcare-related software... integrates engineering principles with medical science to improve patient care and clinical outcomes. Its innovations often involve connected or network-enabled technologies, generating sensitive data such as patient medical records, biometric identifiers, device telemetry, and proprietary engineering designs.

This convergence of biological data and operational technology makes the sector a high-value target for cybercriminals and nation-state actors aiming to steal intellectual property, compromise patient safety, or disrupt critical healthcare infrastructure.

Information security and privacy challenges include protecting regulated health data under HIPAA, GDPR, and other frameworks; securing embedded systems and firmware from tampering; and mitigating vulnerabilities in supply chains and manufacturing processes.

Cyber resilience is further strained by the need to ensure the continuous, safe operation of life-sustaining devices, defend against ransomware or remote exploitation, and balance rapid innovation with rigorous compliance and risk management to preserve both patient trust and technological integrity.

The following sections dive deeper into specific challenges and recommendations for some of the sub-industries within this industry.

### 4.3.1 Medical Devices

Medical Devices range from standalone diagnostic equipment to complex, networked therapeutic systems. Increasingly, these devices are software-driven, connect wirelessly or via the internet, and exchange sensitive patient data with hospital networks and cloud-based management platforms. The convergence of IT and operational technology (OT) in this domain creates dual risk: a cyberattack can compromise both data confidentiality and the safety or effectiveness of the device itself.

#### 4.3.1.1 Challenges

Attackers may exploit unpatched vulnerabilities in device firmware, intercept unencrypted communications, or gain unauthorized access through weak authentication schemes. Devices with embedded operating systems... often outdated due to long product lifecycles... can harbor known vulnerabilities for years. Regulatory agencies such as the **FDA** and the **European Medicines Agency (EMA)** have issued updated guidance for medical device cybersecurity, but inconsistent implementation and varying maturity levels across manufacturers leave gaps that adversaries can exploit.

Connected devices used in home healthcare add another layer of complexity: they operate in uncontrolled network environments, are often managed by patients or caregivers with limited technical expertise, and may be integrated with consumer-grade routers or IoT devices. This increases the risk of device compromise through local network vulnerabilities.

#### 4.3.1.2 Recommendations

Medical device manufacturers and healthcare organizations should embed cybersecurity requirements into device design from the outset... **security-by-design**... and maintain vulnerability management programs throughout the product lifecycle. Devices should implement secure boot, signed firmware updates, and encrypted communications. Strong, unique authentication credentials must replace any hardcoded or default passwords.

Healthcare delivery organizations should maintain an asset inventory of all connected devices, **segment** them from other IT networks<sup>216</sup>, and use **intrusion detection/prevention systems (IDS/IPS)** tuned for medical device traffic. **Incident response plans** must include device-specific recovery steps, including procedures for safely removing compromised devices from service.

For home-use devices, manufacturers should develop user-friendly security controls and update mechanisms, provide clear instructions on safe network integration, and ensure remote support is available to address security issues. All parties should participate in coordinated vulnerability disclosure programs to address security flaws rapidly and transparently.

#### 4.3.1.3 References

- **FDA Guidance**<sup>217</sup> on Content of Premarket Submissions for Management of Cybersecurity in Medical Devices
- **ISO 14971**<sup>218</sup> – Risk Management for Medical Devices
- **IEC 62304**<sup>219</sup> – Software Lifecycle Processes for Medical Device Software
- **IMDRF Cybersecurity Principles for Medical Devices**<sup>220</sup>
  - From the International Medical Device Regulators Forum (IMDRF)
- **NIST SP 1800-8**<sup>221</sup> – Securing Wireless Infusion Pumps

### 4.3.2 Prosthetics & Orthotics

Prosthetics and orthotics design has evolved dramatically with the integration of *advanced materials*, *biomechanical modeling*, *robotics*, and *embedded sensor systems*. Modern devices may include **Bluetooth** or **Wi-Fi connectivity** for tuning and diagnostics, **onboard microprocessors** running proprietary **control algorithms**, and **integration with mobile apps** or **cloud platforms** for performance tracking. These advances create new cybersecurity and privacy risks... *unauthorized* access could reveal sensitive biometric data, allow remote tampering with device settings, or compromise the intellectual property embedded in control systems.

#### 4.3.2.1 Challenges

Supply chain *complexity* is a notable challenge. Prosthetics and orthotics often involve multiple vendors providing hardware components, firmware, CAD/CAM design files, and clinical fitting data. Weak security in any part of this chain can lead to design theft, data leakage, or insertion of compromised components. Additionally, clinical fitting and usage data... often containing **patient health records**, gait patterns, and mobility metrics... fall under regulations such as **HIPAA** and **GDPR**. This means that security failures can have both safety and legal consequences.

#### 4.3.2.2 Recommendations

Manufacturers should adopt a **secure development lifecycle (SDLC)**<sup>222</sup> for **embedded device** software, including **threat modeling** for connectivity features and encryption for all stored/transmitted data. Firmware updates should

<sup>216</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>217</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cybersecurity-medical-devices-quality-system-considerations-and-content-premarket-submissions>

<sup>218</sup> <https://www.iso.org/standard/72704.html>

<sup>219</sup> <https://www.iso.org/standard/38421.html>

<sup>220</sup> <https://www.imdrf.org/documents/principles-and-practices-medical-device-cybersecurity>

<sup>221</sup> <https://csrc.nist.gov/pubs/sp/1800/8/final>

<sup>222</sup> <https://www.eccouncil.org/cybersecurity-exchange/application-security/what-are-the-five-phases-of-the-secure-software-development-life-cycle/>

be signed, tested, and delivered over secure channels. Unique device identifiers (UDIs) and tamper-evident seals can help prevent substitution with counterfeit components.

Clinics and rehabilitation centers deploying these devices should ensure that patient fitting data is transmitted over encrypted channels and stored in secure, access-controlled systems. Mobile apps associated with prosthetic or orthotic devices must undergo penetration testing and comply with app store privacy/security requirements.

Finally, partnerships with component suppliers should include contractual security clauses and vendor audits. Participation in industry-wide coordinated vulnerability disclosure programs will allow for rapid identification and mitigation of vulnerabilities affecting multiple device models or manufacturers.

#### 4.3.2.3 *References*

- **ISO 13485**<sup>223</sup> – Medical Devices Quality Management Systems
- **ISO 10328**<sup>224</sup> – Structural Testing of Lower-Limb Prostheses
- **FDA** Guidance for Industry – Postmarket Management of Cybersecurity in Medical Devices<sup>225</sup>
- **IEC 62443**<sup>226</sup> – Industrial Automation and Control Systems Security
- **NIST Cybersecurity Framework (CSF)**<sup>227</sup>

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<sup>223</sup> <https://www.iso.org/standard/59752.html>

<sup>224</sup> <https://www.iso.org/standard/70205.html>

<sup>225</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/postmarket-management-cybersecurity-medical-devices>

<sup>226</sup> <https://www.iso.org/standards-and-publications/iso-standards/iso-iec-62443-series-of-standards>

<sup>227</sup> <https://www.nist.gov/cyberframework>

### 4.3.3 Implantable Devices

Implantable devices... including cardiac pacemakers, neurostimulators, insulin pumps, cochlear implants, and drug delivery systems... are **among the most sensitive** biomedical technologies from a security and safety standpoint.

#### 4.3.3.1 Challenges

These devices often contain wireless communication capabilities for monitoring and configuration, which, if compromised, could lead to patient harm or death. Vulnerabilities can arise from insecure firmware, insufficient authentication protocols, and unencrypted data exchanges between the device, external programmers, and cloud platforms.

The challenge is compounded by long device lifespans, which may exceed the period during which vendors provide security updates. Many devices in use today run on legacy hardware or software stacks that cannot be easily patched without surgical intervention. Additionally, the supply chain for implantable devices is complex, involving multiple component vendors, contract manufacturers, and software developers... each introducing potential weaknesses that adversaries can exploit. Beyond safety risks, these devices often store PHI, meaning a compromise can result in both a data breach and a clinical incident.

#### 4.3.3.2 Recommendations

Manufacturers should embed **security-by-design** principles during development, implementing secure boot, digitally signed firmware, encrypted storage, and mutual authentication for all communications. They should also provide over-the-air update mechanisms with cryptographic integrity checks, ensuring security patches can be delivered without invasive procedures.

Healthcare organizations should inventory all implantable devices in use, **segment**<sup>228</sup> their associated monitoring systems on secured networks, and monitor for anomalous communication patterns. Device programmers should be locked down to authorized personnel, with strong authentication and audit logging enabled.

Finally, both manufacturers and healthcare providers should participate in **coordinated vulnerability disclosure programs** to identify and remediate risks promptly. Post-market surveillance should include ongoing security risk assessment, and recall or advisory procedures must be ready to activate in the event of critical vulnerabilities. Clear, patient-friendly communication protocols should be in place to explain security updates or safety advisories.

#### 4.3.3.3 References

- **FDA** Guidance on Postmarket Management of Cybersecurity in Medical Devices<sup>229</sup>
- **ISO 14971**<sup>230</sup> – Risk Management for Medical Devices
- **IEC 62443**<sup>231</sup> – Security for Industrial Automation and Control Systems
- **NIST SP 800-53**<sup>232</sup> – Security and Privacy Controls
- **IMDRF** Cybersecurity Guidance for Medical Devices<sup>233</sup>

<sup>228</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>229</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/postmarket-management-cybersecurity-medical-devices>

<sup>230</sup> <https://www.iso.org/standard/72704.html>

<sup>231</sup> <https://www.iso.org/standards-and-publications/isa-standards/isa-iec-62443-series-of-standards>

<sup>232</sup> <https://csrc.nist.gov/pubs/sp/800/53/r5/upd1/final>

<sup>233</sup> <https://www.imdrf.org/documents/principles-and-practices-medical-device-cybersecurity>

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#### 4.3.4 Surgical Robotics

Surgical robotics platforms, such as robotic-assisted laparoscopic systems, have become integral to advanced surgical procedures, enabling precision, minimally invasive techniques, and improved patient outcomes. However, their complexity and high degree of connectivity create unique cybersecurity and privacy risks.

##### 4.3.4.1 Challenges

Surgical robots are often integrated into hospital IT networks, connected to imaging systems, and sometimes offer remote operation or diagnostics. A compromise in these systems could disrupt procedures, cause patient harm, or expose sensitive patient and procedural data.

These platforms are highly specialized, combining mechanical subsystems, real-time control software, AI-assisted navigation, and network interfaces. Any vulnerabilities in firmware, control protocols, or operating systems can be exploited by malicious actors. Threat scenarios range from denial-of-service attacks during surgery to the unauthorized capture of high-definition intraoperative images or videos, which may include PHI. Furthermore, because surgical robots represent multi-million-dollar capital investments with long operational lifespans, many remain in service for years with legacy software stacks that may no longer receive timely security patches.

##### 4.3.4.2 Recommendations

Manufacturers should embed **secure development practices** into the lifecycle of surgical robotics systems, including **code review**, **penetration testing**, and **threat modeling** for both IT and OT components. Control software should implement **secure boot processes**, **signed firmware**, and **encrypted** communication between operator consoles, robotic arms, and ancillary systems. Any **remote support** capabilities should be gated by **strong multifactor authentication** and **logged for auditing** purposes.

Hospitals deploying surgical robotics should maintain them on **segmented networks**<sup>234</sup>, isolated from general hospital traffic, and restrict inbound/outbound communications to only essential services. A rigorous **patch and vulnerability management process** must be established in partnership with the manufacturer, including **clear SLAs** for addressing critical security flaws.

**Incident response planning** should incorporate surgical **contingency procedures** to allow rapid manual takeover in the event of a robotic system failure. **Staff training** should cover not just operation but also cybersecurity awareness, including recognizing signs of anomalous system behavior. Finally, organizations should **periodically review** system **logs**, conduct **tabletop exercises**, and participate in industry **threat intelligence sharing** programs such as **Health-ISAC**<sup>235</sup> to stay ahead of emerging risks.

##### 4.3.4.3 References

- **FDA** Guidance on Premarket and Postmarket Cybersecurity in Medical Devices<sup>236</sup>
- **ISO 14971**<sup>237</sup> – Medical Device Risk Management
- **IEC 62443**<sup>238</sup> – Security for Industrial Automation and Control Systems
- **NIST SP 800-53**<sup>239</sup> – Security and Privacy Controls

<sup>234</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>235</sup> <https://health-isac.org/>

<sup>236</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/postmarket-management-cybersecurity-medical-devices>

<sup>237</sup> <https://www.iso.org/standard/72704.html>

<sup>238</sup> <https://www.iso.org/standards-and-publications/isa-standards/isa-iec-62443-series-of-standards>

<sup>239</sup> <https://csrc.nist.gov/pubs/sp/800/53/r5/upd1/final>

- Association for the Advancement of Medical Instrumentation (AAMI) TIR57 – Principles for Medical Device Security

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## 4.4 Diagnostics

The Diagnostics industry... covering laboratory testing, imaging technologies, point-of-care devices, molecular diagnostics, and emerging AI-driven diagnostic platforms... plays a critical role in detecting, monitoring, and preventing disease. Its operations generate and process highly sensitive data, including patient health records, genomic information, diagnostic images, and proprietary testing methodologies, making it a prime target for cyberattacks aimed at stealing personal health information, manipulating results, or disrupting clinical services.

Key information security and privacy challenges include safeguarding regulated data under frameworks such as HIPAA, GDPR, and evolving genetic data protection laws; securing interconnected diagnostic equipment and laboratory information systems that may be vulnerable to exploitation; and ensuring the accuracy and integrity of test results in both centralized and decentralized testing environments.

Cyber resilience is further tested by the industry's reliance on complex supply chains, integration with hospital and healthcare IT networks, and the need to maintain uninterrupted operations where delays or inaccuracies could directly affect patient outcomes.

The following sections dive deeper into specific challenges and recommendations for some of the sub-industries within this industry.

### 4.4.1 In Vitro Diagnostics (IVD)

**In vitro diagnostics (IVD)**<sup>240</sup> encompass tests performed on blood, tissue, and other samples to detect diseases, monitor health, or guide treatment decisions. They range from simple rapid tests to complex molecular assays involving PCR, next-generation sequencing (NGS), and high-throughput automated analyzers.

#### 4.4.1.1 Challenges

The security and privacy challenges in IVD stem from the handling of sensitive patient samples and the generation of diagnostic data that is both **medically sensitive** and **commercially valuable**.

IVD systems increasingly incorporate network connectivity for transmitting results **to laboratory information systems (LIS), electronic health records (EHR), and cloud-based analytics platforms**. Without strong safeguards, these connections can be exploited to *intercept, alter, or exfiltrate* diagnostic results. Furthermore, molecular IVDs often generate **genomic data**, which falls under **special protections** in regulations like **GDPR** and **HIPAA**, and may be subject to additional *ethical* considerations. Malicious alteration of test results could have life-threatening consequences, making data integrity a critical concern.

The IVD supply chain also presents **vulnerabilities**. *Reagents, assay kits, and embedded firmware* in analyzers can be **tampered** with, either for **sabotage** or to introduce subtle variations that could skew results. **Counterfeit or compromised components** entering the diagnostic supply chain can **erode trust**, delay treatment, and cause regulatory violations.

#### 4.4.1.2 Recommendations

IVD manufacturers should integrate cybersecurity controls into both hardware and software design. This includes **secure boot processes, digitally signed firmware updates, encryption** of all patient data at rest and in transit, and **role-based access** to analyzer control interfaces. Data integrity measures, such as cryptographic **hashing** and **immutable audit logs**, should be in place to detect unauthorized alterations to results.

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<sup>240</sup> <https://www.fda.gov/medical-devices/products-and-medical-procedures/in-vitro-diagnostics>



Clinical laboratories should **segment** diagnostic instruments onto dedicated, secured **network segments**<sup>241</sup> and monitor them with **intrusion detection** tuned for laboratory traffic. All **LIS** and **EHR integrations** must use secure APIs with *mutual authentication* and *encrypted* transport. Supply chain risk management processes should verify the authenticity of all reagents, kits, and device components, with supplier security assessments conducted regularly.

Finally, organizations should establish clear **incident response protocols** for diagnostic systems, including procedures for retesting in the event of suspected data compromise. **Training** for lab personnel should include **awareness** of both cybersecurity risks and data privacy *obligations* to ensure that security is treated as a core element of diagnostic quality.

#### 4.4.1.3 References

- **ISO 13485**<sup>242</sup> – Quality Management Systems for Medical Devices
- **ISO 15189**<sup>243</sup> – Medical Laboratories – Requirements for Quality and Competence
- **FDA** Guidance for Industry – Cybersecurity in In-Vitro Diagnostic Devices<sup>244</sup>
- **GDPR** – Special Category<sup>245</sup> Data Protections
- **NIST SP 800-53**<sup>246</sup> – Security and Privacy Controls

### 4.4.2 Imaging Diagnostics (MRI, CT, PET, Ultrasound)

Imaging diagnostics platforms... ranging from high-resolution **MRI** and **CT** scanners to **PET** and **ultrasound** devices... are critical for accurate diagnosis, treatment planning, and disease monitoring. These systems produce *large volumes* of **highly sensitive patient data**, including **identifiable medical images**, associated **metadata**, and sometimes **biometric markers**. Given their integration with hospital networks, **Picture Archiving and Communication Systems (PACS)**, and increasingly with AI-based image analysis services, they present a broad and high-value attack surface.

#### 4.4.2.1 Challenges

*Vulnerabilities* can arise from multiple sources: **outdated device firmware**, insecure **DICOM**<sup>247</sup> configurations, **unencrypted transmission** of imaging data, and **weak authentication** for **remote access** or **tele-radiology**. **PACS servers**, if improperly configured, have been exposed on the internet in past breaches, leaving millions of images accessible without authentication. *Imaging devices* also often operate on embedded or legacy OS platforms that are challenging to patch without disrupting clinical workflows, increasing the risk window for known exploits.

There is also a **risk to data integrity**: *malicious alteration* of imaging datasets could mislead diagnostic interpretations, impacting patient care. This risk is heightened when **AI algorithms** are introduced, as attacks on training datasets or inference models could bias diagnostic outcomes. Additionally, the interoperability demands of imaging systems... connecting across radiology, oncology, surgery, and external specialists... expand the number of integration points that must be secured.

<sup>241</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>242</sup> <https://www.iso.org/standard/59752.html>

<sup>243</sup> <https://www.iso.org/standard/56115.html>

<sup>244</sup> <https://dcndx.com/insights/fda-cybersecurity-guidance-ivd-devices-medical/>

<sup>245</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>246</sup> <https://csrc.nist.gov/pubs/sp/800/53/r5/upd1/final>

<sup>247</sup> <https://dicom.nema.org>

#### 4.4.2.2 Recommendations

Healthcare organizations should maintain a complete **asset inventory** of imaging devices, including **software/firmware versions**, network **configurations**, and **patch status**. Imaging networks should be **segmented**<sup>248</sup> from other clinical and administrative systems, and PACS servers should be isolated with strict firewall rules and secure VPN access for remote users. All imaging data transfers should be encrypted using TLS, and **DICOM** communications should be configured with mutual authentication.

Manufacturers should provide digitally signed firmware updates and timely vulnerability disclosures, with hospital IT teams integrating these into routine maintenance cycles. AI-assisted imaging workflows should include model validation against adversarial manipulation and maintain secure, version-controlled model repositories.

PACS and imaging archives should implement robust access logging and anomaly detection, triggering alerts for unusual access patterns. Organizations should conduct periodic penetration testing of imaging workflows, including simulated compromise of imaging modalities, to validate the resilience of both IT and OT components in the diagnostic chain.

#### 4.4.2.3 References

- **DICOM**<sup>249</sup> Standard Security Profiles<sup>250</sup>
- **NEMA**<sup>251</sup> Cybersecurity Technical Report for Medical Imaging Devices
- **ISO/IEC 27001**<sup>252</sup> – Information Security Management Systems
- **NIST SP 1800-24**<sup>253</sup> – Securing PACS
- **FDA** Guidance on Cybersecurity for Medical Devices<sup>254</sup>

<sup>248</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>249</sup> <https://dicom.nema.org>

<sup>250</sup> [https://dicom.nema.org/medical/dicom/current/output/chtml/part02/sect\\_7.6.html](https://dicom.nema.org/medical/dicom/current/output/chtml/part02/sect_7.6.html)

<sup>251</sup> <https://www.nema.org>

<sup>252</sup> <https://www.iso.org/standard/27001>

<sup>253</sup> <https://csrc.nist.gov/pubs/sp/1800/24/ipd>

<sup>254</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cybersecurity-medical-devices-quality-system-considerations-and-content-premarket-submissions>

### 4.4.3 Point-of-Care Diagnostics

Point-of-care (POC) diagnostics are designed to bring testing capabilities directly to the patient's bedside, a clinic, or other decentralized settings... offering rapid results that can guide immediate clinical decisions. These systems range from handheld analyzers and portable ultrasound units to rapid antigen tests and compact molecular diagnostic platforms. While their convenience and speed are invaluable, their deployment in non-traditional environments creates distinct security and privacy risks.

#### 4.4.3.1 Challenges

POC devices often connect to hospital information systems (HIS), electronic health records (EHR), or laboratory information systems (LIS) over wireless or mobile networks, including public cellular services. Without robust encryption and endpoint authentication, transmitted test results and patient identifiers can be intercepted or altered. Many devices are designed for ease of use and may lack strong user authentication, making them vulnerable to unauthorized access... especially in high-traffic care settings.

The portability of POC devices introduces additional challenges. Devices can be lost, stolen, or accessed by unauthorized personnel in community clinics or mobile healthcare units. In resource-limited environments, devices may be shared across multiple facilities, with inconsistent security configurations and no centralized update mechanism. The supply chain for consumables and cartridges also presents tampering risks that could compromise result accuracy or patient safety.

#### 4.4.3.2 Recommendations

Manufacturers should integrate **security-by-design** into POC platforms, including strong user authentication, encrypted data storage and transmission, and secure firmware update mechanisms. Devices should maintain local audit logs of test activities, with regular synchronization to secure central systems for monitoring and anomaly detection.

Healthcare organizations deploying POC devices must establish a standardized provisioning process, applying consistent network configurations, security policies, and update schedules. Device inventories should track asset location, firmware versions, and security status. In mobile or field environments, physical security measures... such as locking storage cases or secure docking stations... should be employed.

Finally, all personnel using POC diagnostics should receive training in both operational and cybersecurity procedures, including how to recognize tampering or unauthorized device access. Clear incident reporting protocols should be established so that any suspected compromise can be investigated quickly, and affected test results can be validated or repeated to ensure patient safety.

#### 4.4.3.3 References

- **ISO 22870**<sup>255</sup> – Point-of-Care Testing (POCT) – Requirements for Quality and Competence
- **ISO 15189**<sup>256</sup> – Medical Laboratories – Requirements for Quality and Competence
- **FDA** Guidance on Cybersecurity for Medical Devices<sup>257</sup> and POC Testing Platforms
- **GDPR** – Special Category<sup>258</sup> Data Protections
- **NIST SP 800-53**<sup>259</sup> – Security and Privacy Controls

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<sup>256</sup> <https://www.iso.org/standard/76677.html>

<sup>257</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cybersecurity-medical-devices-quality-system-considerations-and-content-premarket-submissions>

<sup>258</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>259</sup> <https://csrc.nist.gov/pubs/sp/800/53/r5/upd1/final>

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#### 4.4.4 Wearable Health Monitoring

Wearable health monitoring devices... such as continuous glucose monitors, smartwatches with ECG capabilities, ambulatory blood pressure monitors, and fitness trackers with clinical-grade sensors... are increasingly used for continuous patient monitoring and real-time diagnostics. These devices collect vast amounts of sensitive physiological data, often combined with location, activity, and lifestyle metrics. The result is a uniquely detailed profile of an individual's health status and daily life, making these devices highly attractive to attackers for identity theft, blackmail, or commercial exploitation.

##### 4.4.4.1 Challenges

Many wearable devices connect to smartphones, cloud platforms, or healthcare provider portals via Bluetooth, Wi-Fi, or cellular connections. Insecure pairing processes, outdated firmware, or unencrypted communications can be exploited to intercept data or inject malicious commands. Some wearable devices are part of regulated medical systems, while others fall into a consumer wellness category... creating inconsistent regulatory oversight and varied cybersecurity maturity levels among manufacturers.

Another challenge lies in the long-term retention and secondary use of wearable health data. Aggregated datasets are valuable for research and product development, but if anonymization is weak, individuals can be re-identified... especially when health metrics are combined with other personal datasets. Inadequate consent mechanisms or opaque privacy policies can also create regulatory and reputational risks.

##### 4.4.4.2 Recommendations

Manufacturers of wearable health devices should implement **secure-by-design** practices, including strong encryption for data at rest and in transit, secure Bluetooth pairing protocols, digitally signed firmware updates, and tamper resistance in hardware. **Privacy-by-design** principles<sup>260</sup> must also be integrated, ensuring that users have clear, informed consent over how their health data is collected, stored, and shared.

Healthcare organizations and research institutions using wearable devices for patient monitoring should establish secure provisioning processes, including device identity verification and consistent configuration management. Data collected from wearables should be ingested into secure, access-controlled environments with audit logging and real-time anomaly detection for unusual activity patterns.

Finally, policies for secondary use of wearable health data must include robust anonymization or pseudonymization techniques, and users should be given meaningful opt-in/opt-out choices. Collaboration with regulators and participation in industry standards bodies will help ensure that wearable health monitoring technologies evolve in a secure and privacy-conscious manner, maintaining both clinical value and patient trust.

##### 4.4.4.3 References

- **ISO/IEEE 11073**<sup>261</sup> – Personal Health Device Communication Standards
- **ISO 14971**<sup>262</sup> – Risk Management for Medical Devices
- **GDPR** – Special Category<sup>263</sup> Data Protections
- **HIPAA** Privacy<sup>264</sup> and Security<sup>265</sup> Rules
- **NIST SP 800-53**<sup>266</sup> – Security and Privacy Controls

<sup>260</sup> [https://en.wikipedia.org/wiki/Privacy\\_by\\_design](https://en.wikipedia.org/wiki/Privacy_by_design)

<sup>261</sup> <https://www.iso.org/standard/77338.html>

<sup>262</sup> <https://www.iso.org/standard/72704.html>

<sup>263</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>264</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>265</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>266</sup> <https://csrc.nist.gov/pubs/sp/800/53/r5/upd1/final>

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## 4.5 Regenerative Medicine

The Regenerative Medicine industry... encompassing stem cell therapy, tissue engineering, gene editing, and advanced biologics... focuses on repairing, replacing, or regenerating human cells, tissues, and organs to restore normal function and treat previously incurable conditions. This cutting-edge field generates vast amounts of sensitive and high-value data, including patient-specific genetic profiles, proprietary cell line information, clinical trial results, and complex manufacturing protocols for living therapies.

Such assets make the industry a target for cybercriminals, competitors, and state-sponsored actors seeking intellectual property theft, data manipulation, or operational disruption. Information security and privacy challenges include protecting regulated health and genomic data under HIPAA, GDPR, and emerging genetic privacy laws; securing specialized laboratory systems and biomanufacturing platforms often not designed with cybersecurity in mind; and maintaining data integrity across multi-institutional research collaborations.

Cyber resilience is further strained by the need to safeguard cryogenic storage and other critical infrastructure, defend against ransomware and supply chain attacks, and ensure continuous compliance and operational reliability in an environment where any disruption can have direct and irreversible consequences for patient health.

The following sections dive deeper into specific challenges and recommendations for some of the sub-industries within this industry.

### 4.5.1 Stem Cell Research

Stem cell research sits at the intersection of cutting-edge science and sensitive ethical considerations. It involves the collection, manipulation, and differentiation of pluripotent or multipotent cells into specific tissue types for therapeutic use. These processes generate multiple categories of sensitive data: donor/patient health information, genetic profiles, proprietary differentiation protocols, and experimental outcomes. The high commercial and therapeutic value of this data makes it a prime target for theft, while the presence of PHI and genetic data introduces strict privacy obligations under laws such as **HIPAA**, **GDPR**, and local biomedical research regulations.

#### 4.5.1.1 Challenges

Security risks are amplified by the complexity of research environments. Stem cell laboratories often integrate automated cell culture systems, high-throughput screening platforms, and specialized imaging tools... many of which are connected to laboratory networks and, increasingly, to cloud-based analytics. Vulnerabilities in these systems can lead to unauthorized access, data exfiltration, or manipulation of results that could invalidate research or compromise clinical safety. The global nature of stem cell research also introduces jurisdictional complexities, especially around **cross-border** transfer of biological samples and associated data.

Ethical and reputational risks are equally critical. Public scrutiny of stem cell research... especially when it involves embryonic stem cells... means that any breach or misuse of data can have disproportionate reputational consequences. Even inadvertent disclosure of sensitive project details can result in loss of funding, regulatory sanctions, and public backlash.

#### 4.5.1.2 Recommendations

Organizations conducting stem cell research should implement **end-to-end encryption** for all sensitive data, both in transit and at rest, and adopt **role-based access controls** that limit researcher access to only the datasets necessary for their specific responsibilities. Access to automated culture systems and laboratory instruments should require multifactor authentication, with full activity logging.

Data governance frameworks must account for both privacy and biosecurity, incorporating donor consent processes, retention limits, and anonymization/pseudonymization standards for genetic and health data. Secure **digital rights**

**management (DRM)**<sup>267</sup> tools can protect proprietary differentiation protocols and research findings from unauthorized copying or sharing.

When collaborating internationally, institutions should ensure that all partners adhere to equivalent security and privacy standards, backed by formal data transfer agreements. Physical samples should be tracked with secure chain-of-custody procedures, and shipping arrangements should incorporate tamper-evident packaging and GPS-enabled monitoring when appropriate. Regular risk assessments, penetration testing, and tabletop exercises should be conducted to validate readiness against both cyber and physical threats.

#### 4.5.1.3 References

- International Society for Stem Cell Research (**ISSCR**) Guidelines<sup>268</sup>
- **OECD** Best Practices for Biological Resource Centres<sup>269</sup>
- **ISO 20387**<sup>270</sup> – Biobanking – General Requirements
- **HIPAA** Privacy<sup>271</sup> and Security<sup>272</sup> Rules
- **GDPR** – Special Category<sup>273</sup> Data Protections

<sup>267</sup> [https://en.wikipedia.org/wiki/Digital\\_rights\\_management](https://en.wikipedia.org/wiki/Digital_rights_management)

<sup>268</sup> <https://www.isscr.org/guidelines>

<sup>269</sup> [https://www.oecd.org/en/publications/oecd-best-practice-guidelines-for-biological-resource-centres\\_9789264128767-en.html](https://www.oecd.org/en/publications/oecd-best-practice-guidelines-for-biological-resource-centres_9789264128767-en.html)

<sup>270</sup> <https://www.iso.org/standard/67888.html>

<sup>271</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>272</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>273</sup> <https://gdpr-info.eu/art-9-gdpr/>



## 4.5.2 Regenerative Tissue Therapies

Regenerative tissue therapies aim to restore or replace damaged tissues through engineered constructs, bioactive scaffolds, and cellular therapies. These projects require handling of sensitive patient health data, genetic and histological profiles, and proprietary biomaterials formulations. The combination of high commercial value and regulatory oversight makes this an attractive target for cyberattacks, IP theft, and industrial espionage.

### 4.5.2.1 Challenges

The technologies involved—such as 3D bioprinting, scaffold fabrication systems, and automated cell seeding platforms—often connect to lab networks or cloud services for design sharing, process monitoring, and remote control. Without strong **network segmentation**<sup>274</sup> and **encryption**, these systems can be compromised, allowing unauthorized access to production parameters or patient-specific models. Additionally, regulatory compliance for regenerative tissue therapies often spans **FDA’s HCT/P regulations**, **Good Tissue Practice (GTP)** requirements, and **ISO 10993**<sup>275</sup> biocompatibility standards, creating a complex environment for aligning security, quality, and safety controls.

Given the reliance on multi-party collaboration—between research labs, manufacturing facilities, and clinical partners—data must move securely through multiple environments with varying cybersecurity maturity levels. Breaches can cause irreparable harm by leaking proprietary methods, compromising patient safety, or invalidating regulatory submissions.

### 4.5.2.2 Recommendations

Organizations should adopt a **secure product lifecycle approach** for regenerative tissue therapies, covering design, testing, production, and post-market surveillance. Networked fabrication and bioprinting systems must be placed in **segmented**<sup>276</sup>, access-controlled environments, with all control commands and design files **encrypted** in transit and at rest.

Data governance should include granular access controls to patient records, scaffold designs, and production logs, along with immutable audit trails for all data modifications. Collaboration agreements with manufacturing and clinical partners should specify encryption standards, **breach notification** procedures, and periodic security audits.

Physical samples, from tissue scaffolds to patient-derived biomaterials, must be tracked using chain-of-custody protocols and stored in secure, access-controlled facilities. Finally, organizations should integrate cybersecurity drills into broader quality and compliance training, ensuring that staff can recognize and respond to both physical and digital threats to regenerative therapy workflows.

### 4.5.2.3 References

- **FDA** – Guidance<sup>277</sup> for Human Cells, Tissues, and Cellular and Tissue-Based Products (HCT/Ps)
- **ISO 10993**<sup>278</sup> – Biological Evaluation of Medical Devices
- **ISO 13485**<sup>279</sup> – Quality Management Systems for Medical Devices
- **NIST Cybersecurity Framework (CSF)**<sup>280</sup>

<sup>274</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>275</sup> <https://www.iso.org/standard/68936.html>

<sup>276</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>277</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/regulatory-considerations-human-cells-tissues-and-cellular-and-tissue-based-products-minimal>

<sup>278</sup> <https://www.iso.org/standard/68936.html>

<sup>279</sup> <https://www.iso.org/standard/59752.html>

<sup>280</sup> <https://www.nist.gov/cyberframework>

- **OECD Best Practices for Biological Resource Centres**<sup>281</sup>

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<sup>281</sup> [https://www.oecd.org/en/publications/oecd-best-practice-guidelines-for-biological-resource-centres\\_9789264128767-en.html](https://www.oecd.org/en/publications/oecd-best-practice-guidelines-for-biological-resource-centres_9789264128767-en.html)

### 4.5.3 Organ-on-a-Chip

Organ-on-a-chip technology uses microfluidic devices lined with living human cells to simulate the physiological functions of organs and tissues. These platforms are critical for drug testing, disease modeling, and toxicity assessment, reducing reliance on animal models. The security and privacy risks associated with organ-on-a-chip research stem from both the sensitive biological data generated and the proprietary engineering that underpins device fabrication, fluidic system design, and cell culture protocols.

#### 4.5.3.1 Challenges

Data from organ-on-a-chip studies often includes high-resolution imaging, genetic or proteomic readouts from cultured cells, and detailed records of cell sourcing. When human-derived cells are used, especially from patient donors, the data may fall under strict privacy regulations such as **GDPR** and **HIPAA**. Furthermore, the designs and control systems for these chips... often produced using custom CAD files and software... are valuable intellectual property that can be targeted for industrial espionage.

Many organ-on-a-chip systems are connected to networked analytical instruments or cloud-based monitoring platforms to control experimental conditions and collect longitudinal data. This connectivity introduces the potential for unauthorized access, alteration of experimental conditions, or exfiltration of data. If device control parameters were maliciously altered, it could compromise research integrity or damage expensive prototypes.

#### 4.5.3.2 Recommendations

Organ-on-a-chip research environments should implement **network segmentation**<sup>282</sup> for all connected lab devices, with encrypted channels for data transmission to analytical systems or cloud services. Control systems should use secure authentication, digitally signed firmware/software, and logging of all parameter changes for forensic analysis.

Proprietary design files and experimental protocols should be stored in encrypted repositories with strict role-based access, and backed by **digital rights management (DRM)**<sup>283</sup> controls to prevent unauthorized copying or distribution. Where human-derived materials are used, data governance frameworks must include explicit consent management, anonymization or pseudonymization of biological data, and compliance with jurisdiction-specific privacy laws.

Collaboration with external research institutions or commercial partners should be supported by formal agreements detailing data protection requirements, intellectual property handling, and **breach notification** obligations. Regular penetration testing of both IT and operational technology (OT) systems... alongside continuous staff training... will help ensure that the cutting-edge potential of organ-on-a-chip platforms is realized without compromising security, privacy, or research integrity.

#### 4.5.3.3 References

- **OECD Best Practices for Biological Resource Centres**<sup>284</sup>
- **ISO 13485**<sup>285</sup> – Medical Devices Quality Management Systems
- **ISO 20387**<sup>286</sup> – Biobanking – General Requirements
- **HIPAA Privacy**<sup>287</sup> and **Security**<sup>288</sup> Rules

<sup>282</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>283</sup> [https://en.wikipedia.org/wiki/Digital\\_rights\\_management](https://en.wikipedia.org/wiki/Digital_rights_management)

<sup>284</sup> [https://www.oecd.org/en/publications/oecd-best-practice-guidelines-for-biological-resource-centres\\_9789264128767-en.html](https://www.oecd.org/en/publications/oecd-best-practice-guidelines-for-biological-resource-centres_9789264128767-en.html)

<sup>285</sup> <https://www.iso.org/standard/59752.html>

<sup>286</sup> <https://www.iso.org/standard/67888.html>

<sup>287</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>288</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

- **NIST SP 800-53<sup>289</sup>** – Security and Privacy Controls

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<sup>289</sup> <https://csrc.nist.gov/pubs/sp/800/53/r5/upd1/final>

## 4.6 Biomedical Industry Group-Specific Recommendations

There are some fundamental information security, privacy, and cyber resilience concepts which apply across most of the Biomedical Industry. The following sections describe 5 or 6 of these concepts which would provide a solid foundation for risk management within any organization operating within this industry.

### 4.6.1 Integrate Security into the R&D Lifecycle

Biomedical innovation... from early-stage research through clinical deployment... should adopt **security-by-design** and **privacy-by-design** principles<sup>290</sup>. This means embedding **threat modeling**, access control planning, and compliance requirements into each phase of medical research, device development, diagnostics, and regenerative medicine. Aligning with **NIST Cybersecurity Framework (CSF)**<sup>291</sup>, **ISO/IEC 27001**<sup>292</sup>, and domain-specific standards like **ISO 13485**<sup>293</sup> ensures that both regulatory compliance and proactive risk mitigation are addressed.

### 4.6.2 Protect Patient Data and Clinical Trial Integrity

Sensitive patient data is present in translational medicine, preclinical human-derived materials, and all phases of clinical trials. Organizations should encrypt data at rest and in transit, implement **role-based access controls**, and maintain immutable audit logs to detect tampering. Trials should employ secure electronic data capture (EDC) systems, validated against **ICH GCP**<sup>294</sup> (International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use [ICH] Guideline for Good Clinical Practice [GCP]) and relevant privacy laws, and apply privacy-preserving analytics for multi-site collaborations.

### 4.6.3 Secure Biomedical Engineering and Device Ecosystems

Network-connected medical devices, prosthetics, implantables, and surgical robotics require layered defenses. This includes **secure boot**, **signed firmware**, **encrypted** communications, **network segmentation**<sup>295</sup>, and continuous **vulnerability monitoring**. Device manufacturers should provide timely **security patches** and maintain post-market surveillance programs per **FDA** and **IMDRF**<sup>296</sup> guidelines, while healthcare organizations must integrate these devices into security operations with dedicated **incident response plans**.

### 4.6.4 Harden Diagnostic Platforms and Data Pipelines

IVDs, imaging systems, point-of-care devices, and wearables must be protected from both cyber and supply chain threats. Recommended measures include encrypted results transmission, secure device provisioning, anomaly detection for diagnostic workflows, and strict control of reagent and component sourcing. Imaging networks and PACS should be isolated from general IT traffic, with encrypted **DICOM**<sup>297</sup> transfers and multi-factor authentication for teleradiology.

### 4.6.5 Establish Robust Collaboration and Vendor Risk Management

Biomedical research and clinical operations involve CROs, CDMOs<sup>298</sup>, universities, and technology vendors. Contracts must mandate adherence to equivalent security controls, including **breach notification** SLAs, encryption standards,

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<sup>290</sup> [https://en.wikipedia.org/wiki/Privacy\\_by\\_design](https://en.wikipedia.org/wiki/Privacy_by_design)

<sup>291</sup> <https://www.nist.gov/cyberframework>

<sup>292</sup> <https://www.iso.org/standard/27001>

<sup>293</sup> <https://www.iso.org/standard/59752.html>

<sup>294</sup> [https://database.ich.org/sites/default/files/E6\\_R2\\_Addendum.pdf](https://database.ich.org/sites/default/files/E6_R2_Addendum.pdf)

<sup>295</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>296</sup> <https://www.imdrf.org/documents/principles-and-practices-medical-device-cybersecurity>

<sup>297</sup> <https://dicom.nema.org>

<sup>298</sup> [https://en.wikipedia.org/wiki/Contract\\_manufacturing\\_organization](https://en.wikipedia.org/wiki/Contract_manufacturing_organization)

and compliance verification. Secure collaboration platforms with **federated identity management**<sup>299</sup> and granular data-sharing permissions can reduce exposure in complex multi-party environments.

#### 4.6.6 Address Biosecurity, Ethics, and Public Trust

Stem cell research, regenerative tissue therapies, and organ-on-a-chip technologies carry both scientific promise and public scrutiny. Governance frameworks should include biosecurity review boards, ethical oversight, and culturally sensitive consent processes. Transparent communication and public engagement can help maintain trust, particularly in areas with heightened ethical sensitivity.

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<sup>299</sup> [https://en.wikipedia.org/wiki/Federated\\_identity](https://en.wikipedia.org/wiki/Federated_identity)

## 5 Pharmaceutical Industry Group

The pharmaceutical industry operates at the intersection of high-value intellectual property, global regulatory oversight, and complex supply chains. From early-stage discovery through manufacturing and distribution, security and privacy risks are amplified by the scale of collaboration, the sensitivity of proprietary research, and the impact of operational disruption on patient health. The stakes are especially high: a breach can compromise years of R&D investment, derail regulatory approvals, and affect the global availability of life-saving therapies.

### 5.1 Industry Group-Specific Challenges

**Intellectual property (IP) protection** is a primary concern. Novel molecular entities, biologics, vaccines, and gene or cell therapies represent significant financial and strategic investments. These assets are prime targets for nation-state actors seeking competitive advantage, organized crime syndicates aiming to produce counterfeits, and competitors looking to shortcut R&D cycles. Data theft at the preclinical or clinical stage can undermine market exclusivity and future revenue streams.

**Regulatory compliance** presents another challenge. Pharmaceutical organizations must navigate overlapping regimes including **FDA** and **EMA** drug approval frameworks, **ICH** quality guidelines, and data protection laws like **GDPR** and **HIPAA** when handling patient trial data. The complexity increases in multi-country trials or multinational manufacturing networks, where local laws governing data storage, transfer, and access may conflict with corporate standards.

**Supply chain integrity** is a critical vulnerability. The pharmaceutical supply chain includes raw material suppliers, contract development and manufacturing organizations (CDMOs<sup>300</sup>), contract research organizations (CROs)<sup>301</sup>, packaging companies, logistics providers, and distribution partners. Each represents a potential point of infiltration, whether through cyberattack, counterfeit product insertion, or operational disruption such as ransomware.

Finally, **manufacturing and operational technology (OT) security** is an increasing concern. Modern pharmaceutical production lines are highly automated, using industrial control systems (ICS) and manufacturing execution systems (MES) that are often connected to corporate IT networks. A successful attack on these systems can halt production, corrupt batch records, or cause quality deviations that lead to costly recalls.

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<sup>300</sup> [https://en.wikipedia.org/wiki/Contract\\_manufacturing\\_organization](https://en.wikipedia.org/wiki/Contract_manufacturing_organization)

<sup>301</sup> [https://en.wikipedia.org/wiki/Contract\\_research\\_organization](https://en.wikipedia.org/wiki/Contract_research_organization)

## 5.2 Drug Discovery & Development

The Drug Discovery & Development industry... spanning early-stage compound research, preclinical testing, clinical trials, and regulatory approval... drives the creation of new medicines through a combination of advanced chemistry, biology, data analytics, and high-performance computing. The process generates and relies on highly sensitive data, including proprietary compound libraries, genomic datasets, clinical trial results, and regulatory submissions, all of which are attractive targets for cybercriminals and state-sponsored actors seeking competitive advantage or disruption.

Key information security and privacy challenges include safeguarding regulated patient data under frameworks like HIPAA and GDPR, protecting valuable intellectual property from industrial espionage, and ensuring the integrity of scientific data that underpins safety and efficacy claims.

Cyber resilience is further complicated by the sector's reliance on globally distributed research teams, extensive third-party collaborations, and specialized laboratory and manufacturing systems that may not have robust security controls. Any compromise in data integrity, confidentiality, or availability can delay development timelines, jeopardize regulatory compliance, and directly impact patient access to life-saving therapies.

The following sections dive deeper into specific challenges and recommendations for some of the sub-industries within this industry.

### 5.2.1 Small Molecule Therapeutics

Small molecule therapeutics remain the backbone of modern pharmacology, representing a significant portion of global prescription and over-the-counter medicines. Discovery and development involve extensive computational chemistry, high-throughput screening, medicinal chemistry optimization, and preclinical testing. The **intellectual property** generated... including chemical structures, synthesis pathways, and pharmacological data... is among the **most valuable** and **targeted** assets in the pharmaceutical industry.

#### 5.2.1.1 Challenges

Cyber threats range from direct theft of proprietary compound libraries and lead candidate data to manipulation of results in cheminformatics or in silico modeling systems. These attacks can be launched by competitors, organized crime syndicates, or nation-state actors seeking to accelerate their own drug pipelines. Research data often moves between in-house teams, CROs, academic collaborators, and cloud-based platforms for computational modeling... each connection representing a potential weak point.

Manufacturing considerations also create vulnerabilities. Once a compound is validated, process development for large-scale synthesis involves sensitive batch recipes, supplier lists, and detailed SOPs that could be exploited for counterfeit production or supply chain disruption. Because small molecules often have relatively straightforward synthesis pathways compared to biologics, stolen IP can be reproduced illicitly with fewer barriers.

#### 5.2.1.2 Recommendations

Pharmaceutical companies should maintain **segmented**<sup>302</sup> **research networks** for computational chemistry, cheminformatics, and laboratory automation, with controlled gateways to external collaborators. All compound library and lead candidate data should be encrypted in transit and at rest, with fine-grained access control and detailed audit logging.

Vendor and CRO relationships should be governed by contracts mandating adherence to company security policies, **breach notification** requirements, and data destruction procedures at project end. Cloud services used for molecular

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<sup>302</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)



modeling must be vetted for compliance with applicable data protection standards and configured for least-privilege access.

For manufacturing readiness, protect process development data through strict supply chain vetting, encryption of digital recipes, and **digital watermarking**<sup>303</sup> to trace unauthorized reproduction. Regular security assessments, red-team simulations, and continuous threat intelligence monitoring... especially for dark web activity... will help identify and mitigate targeted attacks before they impact market exclusivity or patient safety.

#### 5.2.1.3 References

- **ICH Q8 (R2)**<sup>304</sup> – Pharmaceutical Development Guidelines
- **ICH Q9**<sup>305</sup> – Quality Risk Management
- **ICH Q10**<sup>306</sup> – Pharmaceutical Quality System
- **ISO/IEC 27001**<sup>307</sup> – Information Security Management Systems
- **NIST SP 800-171**<sup>308</sup> – Protecting Controlled Unclassified Information

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<sup>303</sup> [https://en.wikipedia.org/wiki/Digital\\_watermarking](https://en.wikipedia.org/wiki/Digital_watermarking)

<sup>304</sup> <https://www.ema.europa.eu/en/ich-q8-r2-pharmaceutical-development-scientific-guideline>

<sup>305</sup> <https://www.ema.europa.eu/en/ich-q9-quality-risk-management-scientific-guideline>

<sup>306</sup> <https://www.ema.europa.eu/en/ich-q10-pharmaceutical-quality-system-scientific-guideline>

<sup>307</sup> <https://www.iso.org/standard/27001>

<sup>308</sup> <https://csrc.nist.gov/pubs/sp/800/171/r2/upd1/final>

## 5.2.2 Biologics & Biosimilars

Biologics are complex, large-molecule therapeutics derived from living cells, including monoclonal antibodies, recombinant proteins, and vaccines. Biosimilars are highly similar versions of approved biologics, developed after the original product's patent expiry. Because of their complexity, biologics development generates vast amounts of sensitive data... cell line development records, upstream and downstream process parameters, formulation details, and proprietary analytical characterization methods.

### 5.2.2.1 Challenges

These assets are among the most valuable in the pharmaceutical industry and are prime targets for cyber espionage and IP theft, often by actors seeking to shortcut the costly and time-consuming biologics development process. The attack surface includes process development systems, manufacturing execution systems (MES), laboratory information management systems (LIMS), and data historians that record batch production data. Given the complexity of biologics, unauthorized changes to process parameters could undermine product quality, cause regulatory violations, and jeopardize patient safety.

Biosimilar development presents additional risks because it often requires reverse-engineering the originator's product. This increases competitive sensitivity and the likelihood of targeted attacks by commercial rivals or nation-state actors. Further, the production of both biologics and biosimilars relies on global supply chains for cell culture media, reagents, and single-use bioreactor systems, which can be targeted for disruption or counterfeit infiltration.

### 5.2.2.2 Recommendations

Organizations developing biologics and biosimilars should implement **segregated, access-controlled environments** for cell line data, process parameters, and analytical results. Encryption must be applied end-to-end, with granular role-based access and multi-factor authentication for all systems containing proprietary process data.

Manufacturing environments should be **segmented**<sup>309</sup> from corporate IT networks, and MES/SCADA systems should be hardened against known vulnerabilities. Detailed change control procedures must be in place to ensure that any adjustments to process parameters are authorized, documented, and reviewed.

Vendor and supplier vetting is critical, with contractual security requirements, regular audits, and supply chain monitoring to detect anomalies. Finally, organizations should monitor threat intelligence channels for indicators of targeted interest in their biologics portfolio and conduct regular red-team exercises simulating theft of process data or disruption of manufacturing.

### 5.2.2.3 References

- **ICH Q5A–Q5E**<sup>310</sup> – Quality of Biotechnological Products
- **ICH Q6B**<sup>311</sup> – Specifications for Biotechnological/Biological Products
- **FDA** Guidance for Industry – Quality Considerations for Biosimilars<sup>312</sup>
- **ISO/IEC 27001**<sup>313</sup> – Information Security Management Systems

<sup>309</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>310</sup> <https://www.ema.europa.eu/en/ich-q5e-biotechnological-biological-products-subject-changes-their-manufacturing-process-comparability-biotechnological-biological-products-scientific-guideline>

<sup>311</sup> <https://www.ema.europa.eu/en/ich-q6b-specifications-test-procedures-acceptance-criteria-biotechnological-biological-products-scientific-guideline>

<sup>312</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/quality-considerations-demonstrating-biosimilarity-therapeutic-protein-product-reference-product>

<sup>313</sup> <https://www.iso.org/standard/27001>

- NIST Cybersecurity Framework (CSF)<sup>314</sup>

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<sup>314</sup> <https://www.nist.gov/cyberframework>

### 5.2.3 Vaccines

Vaccine development is one of the most strategically sensitive areas of pharmaceutical R&D. The intellectual property includes proprietary antigen designs, adjuvant formulations, delivery vectors, manufacturing processes, and clinical trial data. Because vaccines can be vital to national and global health responses, they are also high-priority targets for nation-state cyber-espionage, as demonstrated by multiple documented attempts to breach vaccine research programs during the COVID-19 pandemic.

#### 5.2.3.1 Challenges

Security threats extend across the vaccine lifecycle. In the research phase, theft or manipulation of genomic data and immunogenicity results could derail candidate development. During clinical trials, patient data and trial protocols are vulnerable to breaches that could compromise regulatory submissions. In manufacturing, industrial control systems (ICS) and manufacturing execution systems (MES) are potential targets for disruption or sabotage... any contamination or deviation in process parameters can invalidate batches and impact public health.

Distribution adds yet another layer of risk. Cold chain logistics for vaccines are highly temperature-sensitive, and IoT-enabled temperature monitoring systems can be exploited to falsify readings, potentially leading to spoilage or unsafe product release. Counterfeit vaccines entering the supply chain can undermine public trust and create serious health hazards.

#### 5.2.3.2 Recommendations

Vaccine research programs should implement strict **segmentation**<sup>315</sup> between R&D environments, clinical trial systems, and manufacturing networks. All **sensitive research data** should be **encrypted** end-to-end, with **multifactor authentication** and **role-based access** to control exposure.

Manufacturing systems should use **secure remote access** methods for vendor support, with **full logging** and periodic **access reviews**. Cold chain monitoring devices must have **secure firmware**, **encrypted telemetry**, and **tamper detection**. Distribution partners should be vetted through **robust vendor risk assessments**, with *contractual clauses* requiring adherence to security and quality standards.

Threat intelligence sharing with global health agencies, industry ISACs<sup>316</sup>, and government cybersecurity centers is critical to identifying emerging threats. **Incident response plans** should be tested regularly, including simulations of targeted attacks on manufacturing, logistics, or trial data. This proactive approach ensures vaccine programs are resilient not only to technical threats but also to the geopolitical and criminal targeting they inevitably attract.

#### 5.2.3.3 References

- **WHO** Guidelines<sup>317</sup> on the Quality, Safety and Efficacy of Vaccines
- **FDA** Guidance for Industry<sup>318</sup> – Emergency Use Authorization for Vaccines
- **ICH Q5A–Q5E**<sup>319</sup> – Biotechnological Products Quality Guidelines
- **NIST Cybersecurity Framework (CSF)**<sup>320</sup>
- **ISO 13485**<sup>321</sup> – Medical Devices Quality Management Systems (applied to vaccine delivery devices)

<sup>315</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>316</sup> <https://health-isac.org/>

<sup>317</sup> <https://www.who.int/publications/m/item/plasmid-dna-vaccines-annex-2-trs-no-1028>

<sup>318</sup> <https://www.fda.gov/vaccines-blood-biologics/vaccines/emergency-use-authorization-vaccines-explained>

<sup>319</sup> <https://www.ema.europa.eu/en/ich-q5e-biotechnological-biological-products-subject-changes-their-manufacturing-process-comparability-biotechnological-biological-products-scientific-guideline>

<sup>320</sup> <https://www.nist.gov/cyberframework>

<sup>321</sup> <https://www.iso.org/standard/59752.html>

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## 5.2.4 Gene Therapies

Gene therapy development involves the delivery of genetic material... often via viral or non-viral vectors... into a patient's cells to treat or prevent disease. The associated data assets are extraordinarily sensitive: proprietary vector designs, genomic sequences, delivery mechanisms, and preclinical and clinical safety data. These assets represent high-value intellectual property and are attractive targets for nation-state espionage, corporate theft, or cybercriminal exploitation.

### 5.2.4.1 Challenges

The development process for gene therapies is highly collaborative, involving partnerships between academic institutions, biotech companies, contract manufacturing organizations (CMOs), and clinical research sites. This distributed environment increases the number of systems, networks, and endpoints that must be secured. Any compromise in vector design files or production parameters could lead to loss of IP, regulatory setbacks, or even patient safety risks if altered vectors are inadvertently produced or tested.

Gene therapy manufacturing is particularly vulnerable due to its reliance on advanced bioprocessing techniques, including viral vector production in specialized cell lines. These processes are complex, difficult to replicate, and require exact adherence to parameters... making them both highly valuable and highly susceptible to sabotage or manipulation. Regulatory compliance adds another layer of complexity, with strict controls under **FDA** and **EMA** gene therapy guidelines, as well as requirements for the handling of genetic data under **GDPR** and **HIPAA**.

### 5.2.4.2 Recommendations

Organizations developing gene therapies should adopt a **zero-trust**<sup>322</sup> **security model**, with strict **segmentation**<sup>323</sup> between research, manufacturing, and clinical data environments. All vector design files and genomic datasets should be encrypted with hardware-backed key management, and access should require multifactor authentication with granular, role-based permissions.

Manufacturing systems... especially those used for viral vector production... must be segregated from corporate networks and internet access, with all process parameters monitored for anomalies. Vendor contracts for CMOs should mandate equivalent security measures, regular security audits, and incident reporting obligations.

All collaboration platforms should use secure file transfer protocols and include logging for every access, modification, or download of sensitive design data. Finally, regular red-team exercises should simulate targeted attacks on both IP repositories and manufacturing systems, testing the organization's ability to detect, respond, and recover without disruption to critical development timelines.

### 5.2.4.3 References

- **FDA** Guidance for Industry – Human Gene Therapy for Rare Diseases<sup>324</sup>
- **ICH Q5A–Q5E**<sup>325</sup> – Quality of Biotechnological Products Guidelines
- **ISO 20387**<sup>326</sup> – Biobanking – General Requirements
- **NIST Cybersecurity Framework (CSF)**<sup>327</sup>

<sup>322</sup> [https://csrc.nist.gov/glossary/term/zero\\_trust\\_architecture](https://csrc.nist.gov/glossary/term/zero_trust_architecture)

<sup>323</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>324</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/human-gene-therapy-rare-diseases>

<sup>325</sup> <https://www.ema.europa.eu/en/ich-q5e-biotechnological-biological-products-subject-changes-their-manufacturing-process-comparability-biotechnological-biological-products-scientific-guideline>

<sup>326</sup> <https://www.iso.org/standard/67888.html>

<sup>327</sup> <https://www.nist.gov/cyberframework>

- **OECD** Best Practices for Biological Resource Centres<sup>328</sup>

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<sup>328</sup> [https://www.oecd.org/en/publications/oecd-best-practice-guidelines-for-biological-resource-centres\\_9789264128767-en.html](https://www.oecd.org/en/publications/oecd-best-practice-guidelines-for-biological-resource-centres_9789264128767-en.html)

## 5.2.5 Cell Therapies

Cell therapy development involves collecting, engineering, and reintroducing live cells into a patient to treat or cure disease. This includes autologous therapies (patient's own cells) and allogeneic therapies (donor cells). The associated risks are considerable: in addition to the clinical and safety complexities, the development process generates highly sensitive data such as donor/patient genetic profiles, cell engineering protocols, and manufacturing batch records. The data's dual nature... combining PHI with proprietary scientific processes... makes it both a privacy and IP protection priority.

### 5.2.5.1 Challenges

The manufacturing of cell therapies is complex, involving specialized cleanroom environments, cell culture systems, gene editing technologies (such as CRISPR), and cold chain logistics for cell transport. Each of these components can be a cyber or supply chain attack vector. Disruption of manufacturing execution systems (MES) or alterations to cell culture parameters could compromise therapy efficacy and safety, leading to regulatory non-compliance and potential patient harm.

Collaboration across multiple entities... collection centers, manufacturing facilities, clinical sites, and contract development and manufacturing organizations (CDMOs<sup>329</sup>)... means that sensitive data and physical samples travel across numerous systems and jurisdictions. This increases exposure to risks like unauthorized data access, sample misrouting, and non-compliant **cross-border** transfer of biological material.

### 5.2.5.2 Recommendations

Cell therapy programs should implement **secure chain-of-custody protocols** for both physical samples and digital data. This includes tamper-evident packaging, GPS-enabled transport monitoring, and blockchain-based tracking for transparency and integrity assurance.

All manufacturing and processing environments should be **segmented**<sup>330</sup> from corporate IT networks, with MES and laboratory systems protected by strict access controls, multi-factor authentication, and encryption for all sensitive files. Access to donor/patient PHI must be on a need-to-know basis, with anonymization or pseudonymization applied where possible to reduce privacy exposure.

Collaboration agreements with CDMOs<sup>331</sup> and clinical partners should mandate equivalent cybersecurity standards, regular security audits, and **breach notification** SLAs. Staff across the cell therapy value chain... from collection to infusion... should be trained in security awareness and handling procedures for both data and biological material.

### 5.2.5.3 References

- **FDA** Guidance for Industry – Chemistry, Manufacturing, and Control (CMC) Information for Human Gene Therapy INDs<sup>332</sup>
- **ICH Q5A–Q5E**<sup>333</sup> – Quality of Biotechnological Products
- **ISO 20387**<sup>334</sup> – Biobanking – General Requirements

<sup>329</sup> [https://en.wikipedia.org/wiki/Contract\\_manufacturing\\_organization](https://en.wikipedia.org/wiki/Contract_manufacturing_organization)

<sup>330</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>331</sup> [https://en.wikipedia.org/wiki/Contract\\_manufacturing\\_organization](https://en.wikipedia.org/wiki/Contract_manufacturing_organization)

<sup>332</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/chemistry-manufacturing-and-control-cmc-information-human-gene-therapy-investigational-new-drug>

<sup>333</sup> <https://www.ema.europa.eu/en/ich-q5e-biotechnological-biological-products-subject-changes-their-manufacturing-process-comparability-biotechnological-biological-products-scientific-guideline>

<sup>334</sup> <https://www.iso.org/standard/67888.html>



- **NIST Cybersecurity Framework (CSF)**<sup>335</sup>
- **OECD Best Practices for Biological Resource Centres**<sup>336</sup>

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<sup>335</sup> <https://www.nist.gov/cyberframework>

<sup>336</sup> [https://www.oecd.org/en/publications/oecd-best-practice-guidelines-for-biological-resource-centres\\_9789264128767-en.html](https://www.oecd.org/en/publications/oecd-best-practice-guidelines-for-biological-resource-centres_9789264128767-en.html)

## 5.3 Therapeutic Areas

The Therapeutics industry... encompassing the development, manufacturing, and delivery of treatments such as small-molecule drugs, biologics, gene therapies, and personalized medicines... aims to prevent, manage, or cure disease across a wide range of medical conditions. Its operations depend on vast stores of sensitive information, including proprietary formulation data, clinical trial results, patient health records, and genomic profiles, making it a prime target for cybercriminals, competitors, and state-sponsored actors seeking to steal intellectual property, manipulate data, or disrupt production.

Information security and privacy challenges include protecting regulated health and genetic data under HIPAA, GDPR, and emerging genomic data laws; securing complex supply chains that span multiple geographies; and ensuring the integrity of scientific data that underpins regulatory submissions and product safety.

Cyber resilience is further tested by the industry's reliance on specialized manufacturing systems, globally distributed research and production networks, and the need to maintain uninterrupted operations in a sector where delays or disruptions can have direct consequences for patient health and public trust.

The following sections dive deeper into specific challenges and recommendations for some of the sub-industries within this industry.

### 5.3.1 Oncology

Oncology research and development spans molecular target discovery, biomarker validation, drug design, clinical trials, and post-market surveillance. The complexity of cancer biology means oncology programs generate diverse and sensitive datasets... tumor genomic profiles, immunotherapy target maps, clinical imaging, patient outcome data, and proprietary combination therapy protocols. These data assets are highly sought after, both for their competitive value and their potential to guide illicit drug development by rival organizations or nation-state programs.

#### 5.3.1.1 Challenges

Oncology trials often involve global multi-center studies with adaptive trial designs and heavy reliance on biomarker-driven patient stratification. This creates an expansive data ecosystem integrating genomic laboratories, imaging centers, electronic data capture (EDC) systems, and clinical trial management systems (CTMS). Each integration point increases exposure to risks of cyber intrusion, data manipulation, or inadvertent disclosure of protected health information (PHI) under **HIPAA**, **GDPR**, and other regulatory frameworks.

Emerging oncology modalities... such as CAR-T therapies, bispecific antibodies, and personalized neoantigen vaccines... add manufacturing complexities and unique IP protection challenges. The transition from small, specialized manufacturing runs to commercial scale for these advanced therapies can expose process parameters, supplier details, and patient-specific manufacturing data to targeted attacks. Any compromise in these areas can delay treatment delivery or undermine regulatory compliance.

#### 5.3.1.2 Recommendations

Oncology programs should adopt a **data lifecycle security model**, covering all phases from discovery to post-market monitoring. Genomic and biomarker datasets should be encrypted in transit and at rest, with strict access controls, multi-factor authentication, and usage logging. Integration between CTMS, EDC, and laboratory systems should occur through secure APIs with mutual authentication.

For manufacturing of personalized oncology therapies, secure chain-of-custody protocols for both biological materials and digital manufacturing instructions are essential. Cold chain monitoring for patient-specific products must be encrypted and tamper-evident. Vendor agreements with manufacturing and logistics partners should mandate equivalent cybersecurity and quality standards.

Finally, oncology teams should participate in coordinated threat intelligence sharing with industry ISACs<sup>337</sup> and health cybersecurity agencies to stay ahead of targeted attacks. Periodic red-team exercises simulating both IP theft and operational disruption scenarios will help identify vulnerabilities before they are exploited.

#### 5.3.1.3 References

- **ICH E6 (R2)**<sup>338</sup> – Good Clinical Practice Guidelines
- **FDA** Guidance for Industry – Clinical Trial Endpoints for the Approval of Cancer Drugs and Biologics<sup>339</sup>
- **GDPR** – Special Category<sup>340</sup> Data Protections
- **ISO/IEC 27001**<sup>341</sup> – Information Security Management Systems
- **NIST Cybersecurity Framework (CSF)**<sup>342</sup>

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<sup>337</sup> <https://health-isac.org/>

<sup>338</sup> [https://database.ich.org/sites/default/files/E6\\_R2\\_Addendum.pdf](https://database.ich.org/sites/default/files/E6_R2_Addendum.pdf)

<sup>339</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/clinical-trial-endpoints-approval-cancer-drugs-and-biologics>

<sup>340</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>341</sup> <https://www.iso.org/standard/27001>

<sup>342</sup> <https://www.nist.gov/cyberframework>

### 5.3.2 Cardiology

Cardiology R&D covers a wide range of interventions... small molecule drugs for hypertension, biologics for heart failure, implantable cardiac devices, catheter-based interventions, and regenerative therapies for myocardial repair. The data generated across discovery, development, and post-market monitoring includes patient imaging (echocardiograms, MRIs, CT angiograms), continuous telemetry from wearable and implantable devices, genomic and biomarker data, and proprietary device engineering specifications. This mix of PHI and valuable IP presents significant security and privacy risks.

#### 5.3.2.1 Challenges

Cardiology clinical trials often involve complex, longitudinal studies with high volumes of real-time patient monitoring data. This data is frequently transmitted over public or semi-public networks, such as cellular or Wi-Fi connections from remote monitoring devices. Insecure transmission, weak authentication, or poor encryption practices can lead to interception or tampering of clinical data streams.

Additionally, cardiovascular device manufacturing and catheter lab infrastructure are critical dependencies. A cyberattack that disrupts supply chains, halts production, or compromises manufacturing execution systems could delay therapy availability. Device recalls related to security flaws... such as pacemaker or defibrillator vulnerabilities... can have direct patient safety impacts and severe reputational damage.

#### 5.3.2.2 Recommendations

Cardiology research programs should ensure that all telemetry from wearables and implantables uses encrypted, authenticated communication protocols, with multi-factor authentication for access to monitoring dashboards. Cloud platforms storing cardiovascular trial data must be configured for least-privilege access and subject to continuous logging and monitoring for anomalous activity.

Manufacturers should implement **secure-by-design** principles for all cardiac devices, including secure boot, signed firmware updates, and cryptographic key management. Hospitals and research centers deploying these devices should maintain **network segmentation**<sup>343</sup>, isolating implantable devices and catheter lab equipment from general IT networks.

Vendor and CRO agreements should include rigorous security requirements and **breach notification** obligations. Finally, organizations should participate in industry-wide threat intelligence programs, such as Health-ISAC<sup>344</sup>, to stay ahead of emerging threats targeting cardiac research, manufacturing, and patient care systems.

#### 5.3.2.3 References

- **ISO 14708**<sup>345</sup> – Implants for Surgery – Active Implantable Medical Devices
- **ISO/IEC 27001**<sup>346</sup> – Information Security Management Systems
- **FDA Guidance** – Cybersecurity in Medical Devices<sup>347</sup>
- **HIPAA Security**<sup>348</sup> and Privacy<sup>349</sup> Rules

<sup>343</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>344</sup> <https://health-isac.org/>

<sup>345</sup> <https://www.iso.org/standard/52804.html>

<sup>346</sup> <https://www.iso.org/standard/27001>

<sup>347</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cybersecurity-medical-devices-quality-system-considerations-and-content-premarket-submissions>

<sup>348</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>349</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

- **NIST SP 800-53<sup>350</sup>** – Security and Privacy Controls

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<sup>350</sup> <https://csrc.nist.gov/pubs/sp/800/53/r5/upd1/final>

### 5.3.3 Neurology

Neurology R&D addresses disorders of the brain, spinal cord, and peripheral nervous system, including Alzheimer's disease, Parkinson's disease, multiple sclerosis, epilepsy, and rare neurodegenerative conditions. Research in this field produces a broad range of sensitive data types... functional MRI (fMRI) scans, EEG recordings, cerebrospinal fluid biomarkers, genetic profiles, and detailed neuropsychological test results. Because neurological conditions often require long-term monitoring, datasets may span decades, making them attractive for **longitudinal analysis** but also for targeted IP theft or PHI breaches.

#### 5.3.3.1 Challenges

Neurological trials frequently use digital health tools and connected devices such as wearables, home EEG monitors, and cognitive testing apps. These increase the risk surface, particularly if devices lack encryption, use insecure APIs, or transmit data over public networks. Additionally, the integration of AI and machine learning models into neurology research introduces risks of dataset poisoning, adversarial attacks on diagnostic algorithms, and model theft.

The complexity of neurological disorders often demands multinational, multi-institutional research collaborations. This amplifies the challenge of complying with jurisdiction-specific privacy laws (GDPR, HIPAA, PIPEDA) and harmonizing security practices across diverse organizations. Any data breach in this area could have profound ethical and reputational consequences, particularly in rare disease research where participants may be more easily re-identified.

#### 5.3.3.2 Recommendations

Neurology programs should classify and segregate sensitive datasets, ensuring encryption at rest and in transit, with multifactor authentication for all systems storing imaging and neurological test results. AI models and digital diagnostic tools should be stored in controlled repositories with strict access permissions and integrity checks to guard against manipulation or theft.

Device and app vendors must be vetted for compliance with applicable data protection laws and cybersecurity best practices. For home-monitoring devices, use secure communication protocols, digitally signed firmware updates, and tamper detection. Cloud environments hosting neurology research data should implement robust key management and anomaly detection to identify suspicious access patterns.

In multinational collaborations, establish formal data-sharing agreements that mandate encryption standards, secure transfer protocols, and unified **breach notification** processes. Finally, incorporate adversarial resilience testing into AI-based diagnostic systems to ensure they remain robust against intentional data manipulation and emerging cyber threats.

#### 5.3.3.3 References

- **ICH E6 (R2)**<sup>351</sup> – Good Clinical Practice
- **ISO/IEC 27001**<sup>352</sup> – Information Security Management Systems
- **HIPAA Security**<sup>353</sup> and **Privacy**<sup>354</sup> Rules
- **GDPR** – Special Category<sup>355</sup> Data Protections

<sup>351</sup> [https://database.ich.org/sites/default/files/E6\\_R2\\_Addendum.pdf](https://database.ich.org/sites/default/files/E6_R2_Addendum.pdf)

<sup>352</sup> <https://www.iso.org/standard/27001>

<sup>353</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>354</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>355</sup> <https://gdpr-info.eu/art-9-gdpr/>

- **FDA** Guidance on Digital Health Technologies for Remote Data Acquisition in Clinical Investigations<sup>356</sup>

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<sup>356</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/digital-health-technologies-remote-data-acquisition-clinical-investigations>

### 5.3.4 Infectious Diseases

Infectious disease research and drug development is highly sensitive due to its public health impact and geopolitical relevance. Programs in this field focus on bacterial, viral, fungal, and parasitic pathogens, often including high-consequence agents such as novel influenzas, coronaviruses, or antibiotic-resistant bacteria. Data generated includes genomic sequences of pathogens, vaccine candidates, clinical trial results, and epidemiological models... information that can be exploited for both beneficial and malicious purposes.

#### 5.3.4.1 Challenges

Because infectious disease research often overlaps with public health surveillance, data may be collected from multiple countries, requiring navigation of international regulations and treaties, such as the **Nagoya Protocol**<sup>357</sup> and **International Health Regulations (IHR)**<sup>358</sup>. The global scope of this work also increases exposure to targeted cyber-espionage from nation-states seeking to accelerate domestic countermeasure programs or disrupt competitors' efforts. During active outbreaks, timelines are compressed, and the urgency to share data can lead to security shortcuts, making systems and datasets more vulnerable.

Manufacturing and supply chain integrity are critical in this therapeutic area, particularly for vaccines, antivirals, and antibiotics. Cold chain infrastructure, sterile production lines, and distribution logistics can be targeted to cause public health disruption or introduce counterfeit products. IoT-enabled environmental monitoring systems, if compromised, could report false compliance data or mask production anomalies.

#### 5.3.4.2 Recommendations

Infectious disease programs should **segment**<sup>359</sup> pathogen genomic data repositories from other research systems, enforcing end-to-end encryption and multifactor authentication for all access. Data sharing with external collaborators should use secure, authenticated transfer channels, with logging and auditing for all downloads or changes.

Manufacturing systems for vaccines and therapeutics should integrate **tamper detection, anomaly monitoring**, and **strict change control** for process parameters. **Cold chain monitoring** devices (such as *data loggers, wireless sensors, and time-temperature indicators*) must be secured with **signed firmware, encrypted telemetry**, and regular **integrity checks**.

**Incident response plans** should include **outbreak-specific contingencies**, accounting for the **heightened targeting risk** during public health emergencies. Participation in trusted **threat intelligence networks**, including government and health ISACs<sup>360</sup>, is essential for early detection of campaigns against infectious disease research and manufacturing.

#### 5.3.4.3 References

- **WHO** International Health Regulations (IHR)<sup>361</sup>
- **FDA** Guidance for Industry – Development of Drugs for Treatment or Prevention of Infectious Diseases<sup>362</sup>
- **ICH Q5A–Q5E**<sup>363</sup> – Biotechnological Product Quality Guidelines

<sup>357</sup> <https://www.cbd.int/abs/default.shtml>

<sup>358</sup> <https://www.who.int/health-topics/international-health-regulations>

<sup>359</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>360</sup> <https://health-isac.org/>

<sup>361</sup> <https://www.who.int/health-topics/international-health-regulations>

<sup>362</sup> <https://www.fda.gov/about-fda/center-drug-evaluation-and-research-cder/office-infectious-diseases-research-activities>

<sup>363</sup> <https://www.ema.europa.eu/en/ich-q5e-biotechnological-biological-products-subject-changes-their-manufacturing-process-comparability-biotechnological-biological-products-scientific-guideline>



- **ISO 20387**<sup>364</sup> – Biobanking – General Requirements
- **NIST Cybersecurity Framework (CSF)**<sup>365</sup>

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<sup>364</sup> <https://www.iso.org/standard/67888.html>

<sup>365</sup> <https://www.nist.gov/cyberframework>

### 5.3.5 Autoimmune & Inflammatory Diseases

Autoimmune and inflammatory disease research targets conditions such as rheumatoid arthritis, lupus, inflammatory bowel disease, psoriasis, and multiple sclerosis. These programs generate high-value datasets including immunological biomarkers, genomic and proteomic profiles, and proprietary therapeutic mechanisms like biologics, small molecules, or cell therapies that modulate immune pathways. Because many autoimmune treatments involve immunosuppressive agents or highly targeted biologics, the associated R&D data is an attractive target for theft by competitors and nation-state actors.

#### 5.3.5.1 Challenges

Clinical trials in this therapeutic area often require complex longitudinal monitoring, capturing detailed patient histories, laboratory results, and imaging over months or years. The integration of diverse data sources... EHR extracts, laboratory information systems (LIS), wearable health monitors, and specialty lab analytics... creates numerous potential vulnerabilities if not tightly controlled. Additionally, because autoimmune diseases frequently require personalized treatment regimens, research datasets can be especially identifying, raising heightened privacy concerns under **HIPAA** and **GDPR**.

The supply chain for autoimmune therapeutics is also a concern. Many biologics require cold chain distribution, making logistics systems a potential target for tampering or disruption. Counterfeit versions of high-value biologics can enter supply chains, eroding patient trust and endangering health. Cyberattacks on manufacturing execution systems (MES) could alter formulation parameters, leading to compromised product quality.

#### 5.3.5.2 Recommendations

R&D programs should classify and segregate sensitive autoimmune research data, ensuring encryption at rest and in transit, with granular role-based access to datasets. Integration points between EHRs, LIS, and research platforms must be secured with mutual authentication, encrypted APIs, and detailed audit logging.

Manufacturers should embed tamper detection and secure telemetry in cold chain monitoring systems. Supply chain partners must be vetted for both quality assurance and cybersecurity maturity, with contractual requirements for reporting any suspected security incidents.

Clinical trial platforms should adopt **privacy-by-design**<sup>366</sup> methodologies, using pseudonymization where feasible and ensuring participant consent includes explicit information on data sharing, retention, and **cross-border** transfer. Finally, participation in healthcare-specific threat intelligence networks can help organizations detect emerging campaigns targeting autoimmune and inflammatory disease research or product supply chains.

#### 5.3.5.3 References

- **ICH E6 (R2)**<sup>367</sup> – Good Clinical Practice Guidelines
- **FDA** Guidance for Industry – Clinical Trials in Autoimmune Disease<sup>368</sup>
- **GDPR** – Special Category<sup>369</sup> Data Protections
- **ISO/IEC 27001**<sup>370</sup> – Information Security Management Systems
- **NIST Cybersecurity Framework (CSF)**<sup>371</sup>

<sup>366</sup> [https://en.wikipedia.org/wiki/Privacy\\_by\\_design](https://en.wikipedia.org/wiki/Privacy_by_design)

<sup>367</sup> [https://database.ich.org/sites/default/files/E6\\_R2\\_Addendum.pdf](https://database.ich.org/sites/default/files/E6_R2_Addendum.pdf)

<sup>368</sup> <https://www.niaid.nih.gov/diseases-conditions/autoimmune-disease-research>

<sup>369</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>370</sup> <https://www.iso.org/standard/27001>

<sup>371</sup> <https://www.nist.gov/cyberframework>

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### 5.3.6 Rare Diseases & Orphan Drugs

Rare disease and orphan drug development focuses on conditions affecting small patient populations, often fewer than 200,000 individuals in the U.S. or meeting similar thresholds in other jurisdictions. The scarcity of cases makes data both uniquely valuable and uniquely identifiable... particularly when genomic, phenotypic, and clinical histories are combined. Because many rare disease patients participate in multiple studies over time, re-identification risks are higher, even when data is pseudonymized.

#### 5.3.6.1 Challenges

These programs typically involve highly specialized research methodologies, unique manufacturing processes for ultra-small batches, and complex supply chains for rare active ingredients or biologics. Intellectual property... whether in the form of genetic targets, disease models, or proprietary delivery mechanisms... is at heightened risk of targeted theft. Further, manufacturing disruptions have disproportionate impacts: a single incident could eliminate global supply for months or years.

International collaborations are common in rare disease research, often requiring data to cross multiple regulatory boundaries (e.g., **HIPAA**, **GDPR**, Japan's APPI, Canada's PIPEDA). This increases complexity in securing consent, ensuring lawful transfers, and maintaining uniform security controls across diverse partners.

#### 5.3.6.2 Recommendations

Organizations developing orphan drugs should implement **privacy-by-design**<sup>372</sup> practices from the earliest stages of data collection, emphasizing robust de-identification and limiting the collection of identifiable information to only what is essential. Secure, federated data-sharing platforms can help enable collaboration without centralizing sensitive datasets.

Manufacturing sites must be equipped with advanced intrusion detection, secure MES/SCADA systems, and contingency plans to rapidly shift production in the event of a disruption. Given the fragility of supply chains in this space, supplier risk assessments and contractual cybersecurity requirements for raw material providers are essential.

When engaging in multi-jurisdictional research, legal and compliance teams should ensure that all **cross-border** transfers of rare disease data comply with local and international **regulations**, backed by **encryption**, **secure transfer** protocols, and standardized **breach notification** processes. Participation in rare disease-specific research networks and ISACs<sup>373</sup> can also help identify emerging threats targeting this specialized and high-value therapeutic area.

#### 5.3.6.3 References

- **FDA Orphan Drug Act**<sup>374</sup>
- **EMA Regulation (EC) No 141/2000**<sup>375</sup> on Orphan Medicinal Products
- **ICH E6 (R2)**<sup>376</sup> – Good Clinical Practice
- **GDPR** – Special Category<sup>377</sup> Data Protections
- **ISO/IEC 27001**<sup>378</sup> – Information Security Management Systems

<sup>372</sup> [https://en.wikipedia.org/wiki/Privacy\\_by\\_design](https://en.wikipedia.org/wiki/Privacy_by_design)

<sup>373</sup> <https://health-isac.org/>

<sup>374</sup> <https://www.fda.gov/industry/designating-orphan-product-drugs-and-biological-products/orphan-drug-act-relevant-excerpts>

<sup>375</sup> <https://eur-lex.europa.eu/eli/reg/2000/141/oj/eng>

<sup>376</sup> [https://database.ich.org/sites/default/files/E6\\_R2\\_Addendum.pdf](https://database.ich.org/sites/default/files/E6_R2_Addendum.pdf)

<sup>377</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>378</sup> <https://www.iso.org/standard/27001>

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## 5.4 Manufacturing & Supply Chain

The Pharmaceutical Manufacturing & Supply Chain industry... covering the production, packaging, distribution, and logistics of drugs, biologics, and vaccines... plays a critical role in ensuring that safe and effective medicines reach patients worldwide. Its operations rely on highly interconnected systems, including enterprise resource planning (ERP) platforms, industrial control systems, cold chain monitoring, and supplier networks, all of which handle sensitive data such as proprietary formulations, batch records, and regulated patient or clinical trial information. This makes the sector a prime target for cyberattacks, industrial espionage, and supply chain disruptions.

Key challenges in information security and privacy include safeguarding intellectual property, maintaining compliance with regulations like HIPAA, GDPR, and FDA requirements, and protecting sensitive operational and health data from unauthorized access or manipulation.

Cyber resilience is further complicated by the complexity and globalization of the supply chain, the integration of legacy manufacturing systems with modern IT infrastructure, and the need to ensure continuous production and distribution, where any disruption can have significant public health and economic consequences.

The following sections dive deeper into specific challenges and recommendations for some of the sub-industries within this industry.

### 5.4.1 API (Active Pharmaceutical Ingredient) Manufacturing

API manufacturing is the foundation of pharmaceutical production, encompassing the synthesis, fermentation, or extraction of the chemical or biological components that form the active part of a drug. These processes are highly valuable trade secrets involving precise formulations, process parameters, raw material specifications, and quality control methodologies. Because APIs underpin both small-molecule drugs and complex biologics, they are among the most targeted assets for industrial espionage and counterfeit production.

#### 5.4.1.1 Challenges

API facilities rely heavily on process automation, including Manufacturing Execution Systems (MES), Supervisory Control and Data Acquisition (SCADA) platforms, and Distributed Control Systems (DCS). These operational technology (OT) environments are increasingly connected to corporate IT networks for efficiency and reporting, creating potential pathways for cyberattacks. Unauthorized manipulation of process parameters could lead to substandard or dangerous APIs, triggering costly recalls, regulatory sanctions, or patient safety incidents.

Supply chain vulnerabilities add another dimension of risk. API production often involves a global network of raw material suppliers, contract manufacturers, and logistics providers. Counterfeit or adulterated materials can be introduced at multiple points if supplier vetting and security controls are weak. Geopolitical tensions, natural disasters, or targeted ransomware attacks on critical suppliers can also disrupt API availability, impacting downstream manufacturing and drug supply.

#### 5.4.1.2 Recommendations

API manufacturing sites should implement **network segmentation**<sup>379</sup> between OT and IT environments, with firewalls, intrusion detection, and role-based access controls for all process systems. Regular vulnerability assessments and penetration testing should be conducted to identify and remediate weaknesses in MES, SCADA, and DCS environments.

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<sup>379</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

Process data and batch records should be encrypted and stored with immutable logging to detect unauthorized changes. All suppliers should undergo rigorous risk assessments covering both quality and cybersecurity maturity, with contractual requirements for incident reporting and adherence to GMP security standards.

Contingency planning should include identifying alternate suppliers, maintaining safety stock for critical raw materials, and conducting periodic supply chain stress tests. Finally, participation in industry-specific threat intelligence sharing... such as with Health-ISAC<sup>380</sup> or national CERTs... can help API manufacturers anticipate and respond to emerging threats targeting pharmaceutical production.

#### 5.4.1.3 References

- **ICH Q7**<sup>381</sup> – Good Manufacturing Practice Guide for Active Pharmaceutical Ingredients
- **ICH Q9**<sup>382</sup> – Quality Risk Management
- **ISO 28000**<sup>383</sup> – Specification for Security Management Systems for the Supply Chain
- **NIST Cybersecurity Framework (CSF)**<sup>384</sup>
- **FDA Data Integrity and Compliance Guidance**<sup>385</sup>

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<sup>380</sup> <https://health-isac.org/>

<sup>381</sup> <https://database.ich.org/sites/default/files/Q7%20Guideline.pdf>

<sup>382</sup> <https://www.ema.europa.eu/en/ich-q9-quality-risk-management-scientific-guideline>

<sup>383</sup> <https://www.iso.org/standard/79612.html>

<sup>384</sup> <https://www.nist.gov/cyberframework>

<sup>385</sup> <https://www.fda.gov/files/drugs/published/Data-Integrity-and-Compliance-With-Current-Good-Manufacturing-Practice-Guidance-for-Industry.pdf>

## 5.4.2 Formulation Development

Formulation development translates an API into a final drug product, combining it with excipients and determining dosage form, delivery mechanism, and stability profile. This process involves proprietary knowledge about ingredient ratios, manufacturing methods, stability testing data, and bioavailability optimization... all of which are high-value trade secrets. Theft of formulation IP can enable competitors or counterfeiters to reproduce products without the significant investment required for original R&D.

### 5.4.2.1 Challenges

Formulation work also requires extensive analytical testing to ensure safety, efficacy, and consistency. These tests generate sensitive datasets that, if altered, could compromise regulatory submissions or lead to unsafe products reaching patients. Cyber risks include unauthorized access to formulation design systems, manipulation of analytical instrument data, or theft of stability and shelf-life studies. Because formulation data is often shared between R&D, pilot plants, and contract manufacturing organizations (CMOs), each transfer increases exposure.

Counterfeit infiltration is a persistent concern. Sophisticated counterfeiters can exploit leaked formulation details to create products that visually match the authentic drug but fail to deliver the correct therapeutic effect. This risk is compounded by the global distribution of manufacturing activities, making secure coordination across multiple facilities a necessity.

### 5.4.2.2 Recommendations

Formulation development environments should be isolated from general corporate networks, with role-based access to design files, process documentation, and testing results. All formulation data... particularly stability and bioavailability results... should be encrypted in storage and during transmission. Audit trails must be immutable and reviewed regularly for anomalies.

Data exchange with CMOs and analytical laboratories should use secure, authenticated channels, with contractual clauses specifying encryption standards, **breach notification** requirements, and destruction protocols for project data after completion. Counterfeit prevention programs should integrate **digital watermarking**<sup>386</sup> or molecular tagging into finished product batches, enabling verification in the market.

Finally, organizations should perform regular security assessments and **threat modeling** specific to formulation workflows. These exercises should consider both cyber intrusion and insider threats, ensuring that the confidentiality, integrity, and availability of formulation data are maintained throughout the product lifecycle.

### 5.4.2.3 References

- **ICH Q8 (R2)**<sup>387</sup> – Pharmaceutical Development Guidelines
- **ICH Q9**<sup>388</sup> – Quality Risk Management
- **ISO 9001**<sup>389</sup> – Quality Management Systems
- **NIST Cybersecurity Framework (CSF)**<sup>390</sup>
- **FDA Data Integrity and Compliance Guidance**<sup>391</sup>

<sup>386</sup> [https://en.wikipedia.org/wiki/Digital\\_watermarking](https://en.wikipedia.org/wiki/Digital_watermarking)

<sup>387</sup> <https://www.ema.europa.eu/en/ich-q8-r2-pharmaceutical-development-scientific-guideline>

<sup>388</sup> <https://www.ema.europa.eu/en/ich-q9-quality-risk-management-scientific-guideline>

<sup>389</sup> <https://www.iso.org/standard/62085.html>

<sup>390</sup> <https://www.nist.gov/cyberframework>

<sup>391</sup> <https://www.fda.gov/files/drugs/published/Data-Integrity-and-Compliance-With-Current-Good-Manufacturing-Practice-Guidance-for-Industry.pdf>



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### 5.4.3 Packaging & Distribution

Packaging and distribution are the final stages in the pharmaceutical supply chain, but they carry high stakes for security, safety, and regulatory compliance. Packaging lines handle serialized identifiers, tamper-evident features, and product labeling... all of which are critical to preventing counterfeiting and diversion. If compromised, these systems can allow counterfeit drugs to enter legitimate channels, eroding patient trust and potentially causing harm.

#### 5.4.3.1 Challenges

The packaging process is highly automated and depends on integrated IT and OT systems to manage serialization data, track production batches, and verify quality control. Cyberattacks targeting these systems could alter serialization records, disable anti-counterfeiting measures, or disrupt packaging line operations. Because serialization data must often be exchanged with national or regional verification systems (such as the EU Falsified Medicines Directive's EMVS<sup>392</sup>), vulnerabilities in these data transfers can be exploited to bypass safety controls.

Distribution introduces additional risks. Pharmaceuticals are transported globally through complex logistics networks involving multiple carriers, warehouses, and customs checkpoints. Cold chain monitoring systems... especially for biologics, vaccines, and temperature-sensitive drugs... are increasingly IoT-enabled, making them susceptible to cyber tampering. Altered temperature logs can mask spoilage or justify fraudulent insurance claims. In addition, theft and diversion risks remain high, especially in regions with weaker law enforcement or supply chain oversight.

#### 5.4.3.2 Recommendations

Packaging facilities should maintain **segmented**<sup>393</sup> and **access-controlled networks** for serialization and line-control systems, with regular patching and penetration testing of connected equipment. Serialization data should be encrypted in transit and at rest, with digital signatures to verify authenticity before integration into verification databases.

Distribution partners should be subject to rigorous vetting, including physical security audits, cybersecurity capability assessments, and contractual breach reporting obligations. Cold chain monitoring devices must use secure firmware, encrypted telemetry, and tamper alerts, with redundancy in temperature monitoring to detect manipulation.

Organizations should participate in global track-and-trace initiatives and leverage **real-time logistics visibility platforms** to identify **anomalies** in shipment routes or environmental conditions. **Incident response plans** must account for product recalls, counterfeit interdiction, and communication protocols with regulators and customers in the event of a compromise.

#### 5.4.3.3 References

- **ISO 28000**<sup>394</sup> – Specification for Security Management Systems for the Supply Chain
- **GS1 Standards** – Serialization and Traceability<sup>395</sup>
- **EU Falsified Medicines Directive (FMD)**<sup>396</sup>
- **U.S. Drug Supply Chain Security Act (DSCSA)**<sup>397</sup>
- **NIST Cybersecurity Framework (CSF)**<sup>398</sup>

<sup>392</sup> [https://health.ec.europa.eu/medicinal-products/falsified-medicines\\_en](https://health.ec.europa.eu/medicinal-products/falsified-medicines_en)

<sup>393</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>394</sup> <https://www.iso.org/standard/79612.html>

<sup>395</sup> <https://www.gs1.org/standards/gs1-global-traceability-standard/current-standard>

<sup>396</sup> [https://health.ec.europa.eu/medicinal-products/falsified-medicines\\_en](https://health.ec.europa.eu/medicinal-products/falsified-medicines_en)

<sup>397</sup> <https://www.fda.gov/drugs/drug-supply-chain-integrity/drug-supply-chain-security-act-dscsa>

<sup>398</sup> <https://www.nist.gov/cyberframework>

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#### 5.4.4 Cold Chain Logistics

Cold chain logistics are critical for transporting temperature-sensitive pharmaceuticals such as biologics, vaccines, and certain small-molecule formulations. Maintaining specific temperature ranges throughout storage and transport is essential for product efficacy and patient safety. Failures in cold chain integrity... whether from equipment malfunction, human error, or deliberate sabotage... can lead to costly losses, recalls, and reputational damage.

##### 5.4.4.1 Challenges

The widespread adoption of IoT-enabled temperature monitoring systems introduces new attack vectors. These systems transmit environmental data over wireless or cellular networks, which can be intercepted, altered, or spoofed if not properly secured. A cyberattack could falsify temperature logs, conceal actual temperature excursions, or trigger false alarms to disrupt supply chain operations. Additionally, GPS-based shipment tracking, if compromised, could reveal sensitive information about shipment routes and schedules, enabling theft or diversion.

Cold chain logistics rely heavily on third-party carriers, freight forwarders, and distribution hubs, many of which have varying levels of physical and cybersecurity maturity. This increases the risk that a weak link in the supply chain can be exploited to compromise the product or its data. Regulatory frameworks such as the **EU GDP (Good Distribution Practice)**<sup>399</sup> and the **U.S. DSCSA (Drug Supply Chain Security Act)**<sup>400</sup> impose strict requirements on monitoring and documentation, but compliance does not automatically equal security.

##### 5.4.4.2 Recommendations

All cold chain monitoring devices should implement **secure firmware**, digitally signed updates, and encryption for both telemetry and control channels. Redundant monitoring (e.g., independent data loggers) should be used to validate IoT data and detect anomalies. Shipment route and status data should be access-controlled, with geofencing alerts for unauthorized route deviations.

Third-party logistics providers must be vetted for both compliance with GDP/DSCSA and cybersecurity capability. Contracts should include **breach notification** clauses, data handling requirements, and incident response coordination procedures. Where feasible, blockchain-based track-and-trace solutions can provide immutable shipment records that enhance trust between partners.

Finally, organizations should conduct **cold chain stress tests**... both operational and cybersecurity simulations... to evaluate how systems and personnel respond to temperature excursions, equipment failures, or targeted cyberattacks. Regular training for logistics personnel should cover both compliance requirements and security awareness, ensuring that the cold chain remains unbroken from manufacturing to patient delivery.

##### 5.4.4.3 References

- **EU Guidelines on Good Distribution Practice (GDP)**<sup>401</sup> of Medicinal Products for Human Use
- **U.S. Drug Supply Chain Security Act (DSCSA)**<sup>402</sup>
- **ISO 28000**<sup>403</sup> – Security Management Systems for the Supply Chain
- **NIST Cybersecurity Framework (CSF)**<sup>404</sup>

<sup>399</sup> <https://www.ema.europa.eu/en/human-regulatory-overview/post-authorisation/compliance-post-authorisation/good-distribution-practice>

<sup>400</sup> <https://www.fda.gov/drugs/drug-supply-chain-integrity/drug-supply-chain-security-act-dscsa>

<sup>401</sup> <https://www.ema.europa.eu/en/human-regulatory-overview/post-authorisation/compliance-post-authorisation/good-distribution-practice>

<sup>402</sup> <https://www.fda.gov/drugs/drug-supply-chain-integrity/drug-supply-chain-security-act-dscsa>

<sup>403</sup> <https://www.iso.org/standard/79612.html>

<sup>404</sup> <https://www.nist.gov/cyberframework>

- **GS1 Standards for Track and Trace**<sup>405</sup>

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<sup>405</sup> <https://www.gs1.org/standards/gs1-global-traceability-standard/current-standard>

## 5.5 Regulatory & Compliance

The Pharmaceutical Regulatory & Compliance industry... encompassing the agencies, departments, and consultancies that oversee drug safety, efficacy, and legal adherence... ensures that pharmaceutical products meet stringent national and international standards throughout development, manufacturing, and distribution. This sector manages highly sensitive data, including clinical trial submissions, adverse event reports, manufacturing records, and proprietary regulatory filings, making it a target for cybercriminals, competitors, and nation-state actors seeking intellectual property or to manipulate regulatory outcomes.

Key information security and privacy challenges include safeguarding patient health data under HIPAA, GDPR, and other regional regulations, protecting confidential company filings, and ensuring secure communication and data exchange between multiple stakeholders, including global regulators and pharmaceutical firms.

Cyber resilience is further tested by the need to maintain continuous access to regulatory databases, defend against ransomware or supply chain attacks that could delay approvals, and ensure the integrity and authenticity of records in an environment where compromised data can have significant public health, legal, and financial repercussions.

The following sections dive deeper into specific challenges and recommendations for some of the sub-industries within this industry.

### 5.5.1 FDA, EMA, and Other Regulatory Frameworks

Pharmaceutical companies operate under a dense web of national and international regulatory frameworks that govern every stage of drug development, manufacturing, distribution, and post-market surveillance. In the U.S., the **Food and Drug Administration (FDA)** enforces requirements through processes like Investigational New Drug (IND) applications, New Drug Applications (NDAs), and Biologics License Applications (BLAs). In the EU, the **European Medicines Agency (EMA)** coordinates scientific evaluation, safety monitoring, and compliance for all member states.

#### 5.5.1.1 Challenges

Beyond these, many countries maintain their own regulatory authorities... such as Japan's PMDA, Canada's Health Canada, Australia's TGA, and China's NMPA... each with unique submission formats, inspection protocols, and security expectations. Multinational trials and global supply chains must therefore meet the most stringent applicable standards while managing differences in regulatory timelines, electronic submission systems, and data retention rules.

From a security and privacy standpoint, regulatory compliance requires that companies maintain the integrity, confidentiality, and traceability of all data submitted to authorities. This includes clinical trial data, manufacturing records, and pharmacovigilance reports. Cyberattacks targeting regulatory submission systems can delay approvals, damage trust, or result in the dissemination of sensitive proprietary data. Data integrity violations... whether through malicious tampering or poor internal controls... can lead to severe enforcement actions, including warning letters, consent decrees, or product recalls.

#### 5.5.1.2 Recommendations

Pharmaceutical companies should implement validated electronic systems for data capture, storage, and submission, ensuring they comply with **21 CFR Part 11**<sup>406</sup> requirements for electronic records and signatures. Role-based access control, multifactor authentication, and immutable audit trails must be enforced across all regulatory submission systems.

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<sup>406</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/part-11-electronic-records-electronic-signatures-scope-and-application>

A global **regulatory compliance governance program** should harmonize processes across regions, ensuring that security controls meet or exceed the requirements of the strictest applicable jurisdiction. Submission systems should be **segmented**<sup>407</sup> from general IT networks, with encryption applied to all regulatory data in transit and at rest.

**Incident response plans** must include procedures for **notifying regulators** in the event of a breach affecting submission data or manufacturing compliance. Regular **mock audits** and **inspections** should be conducted to validate readiness, identify gaps, and strengthen both compliance and cybersecurity posture. Finally, active participation in **regulatory science initiatives** and **industry working groups** can help companies anticipate evolving requirements and integrate them proactively into their compliance programs.

#### 5.5.1.3 References

- **FDA 21 CFR Parts 11**<sup>408</sup>, **210**<sup>409</sup>, **211**<sup>410</sup>, **600**<sup>411</sup> – Electronic Records, GMP for Drugs and Biologics
- **EMA EudraLex Volume 4**<sup>412</sup> – GMP Guidelines
- **ICH Q8–Q10**<sup>413</sup> – Pharmaceutical Development, Quality Risk Management, and Quality Systems
- **ISO 9001**<sup>414</sup> – Quality Management Systems
- **NIST SP 800-53**<sup>415</sup> – Security and Privacy Controls

<sup>407</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>408</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/part-11-electronic-records-electronic-signatures-scope-and-application>

<sup>409</sup> <https://www.fda.gov/drugs/pharmaceutical-quality-resources/current-good-manufacturing-practice-cgmp-regulations>

<sup>410</sup> <https://www.fda.gov/drugs/pharmaceutical-quality-resources/current-good-manufacturing-practice-cgmp-regulations>

<sup>411</sup> <https://www.ecfr.gov/current/title-21/chapter-I/subchapter-F/part-600>

<sup>412</sup> [https://health.ec.europa.eu/latest-updates/eudralex-volume-4-eu-guidelines-good-manufacturing-practice-medicinal-products-human-and-veterinary-2022-02-21\\_en](https://health.ec.europa.eu/latest-updates/eudralex-volume-4-eu-guidelines-good-manufacturing-practice-medicinal-products-human-and-veterinary-2022-02-21_en)

<sup>413</sup> [https://database.ich.org/sites/default/files/Q8\\_Q9\\_Q10\\_Q%26As\\_R4\\_Points\\_to\\_Consider\\_0.pdf](https://database.ich.org/sites/default/files/Q8_Q9_Q10_Q%26As_R4_Points_to_Consider_0.pdf)

<sup>414</sup> <https://www.iso.org/standard/62085.html>

<sup>415</sup> <https://csrc.nist.gov/pubs/sp/800/53/r5/upd1/final>

## 5.5.2 Good Manufacturing Practice (GMP)

Good Manufacturing Practice (GMP) regulations are designed to ensure that pharmaceuticals are consistently produced and controlled to quality standards appropriate for their intended use. These requirements apply globally, with the **U.S. FDA**, **EU EMA**<sup>416</sup>, **WHO**, and national agencies enforcing their own GMP frameworks. Noncompliance can result in warning letters, consent decrees, recalls, or bans on product import/export.

### 5.5.2.1 Challenges

From a cybersecurity and privacy perspective, GMP compliance depends on the integrity, availability, and security of manufacturing data and systems. Batch records, electronic production logs, and quality control data must be protected against unauthorized access or alteration. Manufacturing Execution Systems (MES) and Laboratory Information Management Systems (LIMS), which hold these records, are increasingly networked and can be targeted for sabotage, falsification of data, or IP theft.

Another challenge is supplier compliance. GMP extends to all contract manufacturers, raw material providers, and critical component suppliers. Weak security practices at any point in the supply chain can compromise the entire GMP program. Additionally, aligning GMP documentation and audit readiness across multinational facilities, each with potentially different IT environments, increases complexity and risk.

### 5.5.2.2 Recommendations

Organizations should implement **validated, access-controlled electronic systems** for recording GMP-critical data, with immutable audit trails and real-time monitoring for anomalous changes. All GMP-related IT and OT systems should be included in vulnerability management and patch cycles, with clear change control protocols for updates.

Manufacturing environments should use **network segmentation**<sup>417</sup> to isolate production equipment from corporate and external networks, with encryption applied to all GMP-related data transfers. Supplier qualification processes must include cybersecurity capability assessments, with contractual requirements for compliance and breach reporting.

Routine internal GMP audits should incorporate cybersecurity checks, ensuring that both regulatory and security requirements are met. Finally, training programs for GMP compliance should include modules on information security and data integrity, reinforcing the shared responsibility between quality and IT functions.

### 5.5.2.3 References

- **FDA 21 CFR Parts 210**<sup>418</sup> & **211**<sup>419</sup> – Current Good Manufacturing Practice for Drugs
- **EU EudraLex Volume 4**<sup>420</sup> – GMP Guidelines
- **WHO** GMP Guidelines<sup>421</sup>
- **ICH Q7** – GMP for Active Pharmaceutical Ingredient<sup>422</sup>

<sup>416</sup> [https://health.ec.europa.eu/latest-updates/eudralex-volume-4-eu-guidelines-good-manufacturing-practice-medicinal-products-human-and-veterinary-2022-02-21\\_en](https://health.ec.europa.eu/latest-updates/eudralex-volume-4-eu-guidelines-good-manufacturing-practice-medicinal-products-human-and-veterinary-2022-02-21_en)

<sup>417</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>418</sup> <https://www.fda.gov/drugs/pharmaceutical-quality-resources/current-good-manufacturing-practice-cgmp-regulations>

<sup>419</sup> <https://www.fda.gov/drugs/pharmaceutical-quality-resources/current-good-manufacturing-practice-cgmp-regulations>

<sup>420</sup> [https://health.ec.europa.eu/latest-updates/eudralex-volume-4-eu-guidelines-good-manufacturing-practice-medicinal-products-human-and-veterinary-2022-02-21\\_en](https://health.ec.europa.eu/latest-updates/eudralex-volume-4-eu-guidelines-good-manufacturing-practice-medicinal-products-human-and-veterinary-2022-02-21_en)

<sup>421</sup> <https://www.who.int/teams/health-product-policy-and-standards/standards-and-specifications/norms-and-standards/gmp>

<sup>422</sup> <https://database.ich.org/sites/default/files/Q7%20Guideline.pdf>



- **ISO 9001<sup>423</sup>** – Quality Management Systems

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<sup>423</sup> <https://www.iso.org/standard/62085.html>

### 5.5.3 Pharmacovigilance

Pharmacovigilance (PV) is the ongoing process of monitoring the safety of pharmaceutical products after they enter the market, with the goal of identifying, assessing, and preventing adverse drug reactions (ADRs) or other drug-related problems. The process involves collecting, processing, and analyzing safety data from healthcare providers, patients, regulatory agencies, and literature sources. This data often includes PHI, detailed medical histories, and other sensitive information... making it subject to stringent privacy and security regulations under **HIPAA**, **GDPR**, and local equivalents.

#### 5.5.3.1 Challenges

Cybersecurity risks include unauthorized access to PV databases, manipulation of ADR data to conceal safety issues, and targeted attacks on regulatory reporting systems. Because PV operations often rely on global safety databases and electronic transmission to regulators (e.g., through E2B(R3) standards), attackers have multiple entry points to exploit. Furthermore, the timeliness and accuracy of PV reporting are critical for regulatory compliance; any system outage or data integrity issue can trigger regulatory actions or public health consequences.

Outsourced PV operations... such as contract safety organizations handling case processing... introduce additional risks. Inconsistent security practices, unsecured file transfers, or unvetted subcontractors can lead to breaches. Further, global operations must coordinate across varying data retention rules, report formats, and submission requirements for authorities such as the FDA, EMA, MHRA, and PMDA.

#### 5.5.3.2 Recommendations

PV systems should be built on **secure, validated platforms** with encrypted databases, strict role-based access, and multifactor authentication for all users. Data in transit between PV systems and regulators should be encrypted, digitally signed, and transmitted through secure channels that meet or exceed **E2B(R3)** specifications.

Third-party PV providers must undergo rigorous vendor risk management, including security assessments, contractual **breach notification** requirements, and clear policies for subcontractor oversight. Where possible, anonymization or pseudonymization should be applied to case data to reduce privacy exposure during analysis.

Organizations should establish redundancy and disaster recovery capabilities to ensure continuous PV reporting even during cyber incidents or infrastructure failures. Regular audits and mock inspections should validate that PV processes meet both security and regulatory expectations, while participation in safety data-sharing initiatives with industry peers and regulators can help detect emerging safety signals more rapidly.

#### 5.5.3.3 References

- **ICH E2E** – Pharmacovigilance Planning<sup>424</sup>
- **ICH E2B(R3)**<sup>425</sup> – Electronic Transmission of Individual Case Safety Reports
- **FDA 21 CFR Part 314**<sup>426</sup> & **600**<sup>427</sup> – Postmarketing Reporting of Adverse Drug Experiences
- **EU GVP**<sup>428</sup> (Good Pharmacovigilance Practices) Modules
- **ISO/IEC 27001**<sup>429</sup> – Information Security Management Systems

<sup>424</sup> [https://database.ich.org/sites/default/files/E2E\\_Guideline.pdf](https://database.ich.org/sites/default/files/E2E_Guideline.pdf)

<sup>425</sup> <https://ich.org/page/e2br3-individual-case-safety-report-icsr-specification-and-related-files>

<sup>426</sup> <https://www.ecfr.gov/current/title-21/chapter-I/subchapter-D/part-314?toc=1>

<sup>427</sup> <https://www.ecfr.gov/current/title-21/chapter-I/subchapter-F/part-600>

<sup>428</sup> <https://www.ema.europa.eu/en/human-regulatory-overview/post-authorisation/pharmacovigilance-post-authorisation/good-pharmacovigilance-practices-gvp>

<sup>429</sup> <https://www.iso.org/standard/27001>

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## 5.6 Pharmaceutical Industry Group-Specific Recommendations

There are some fundamental information security, privacy, and cyber resilience concepts which apply across most of the Pharmaceutical Industry. The following sections describe 5 or 6 of these concepts which would provide a solid foundation for risk management within any organization operating within this industry.

### 5.6.1 Embed Security-by-Design Across the Drug Lifecycle

Pharmaceutical companies must integrate security and privacy controls into every phase of the product lifecycle... from early discovery through post-market pharmacovigilance. This means applying **threat modeling**, **risk-based access controls**, and **immutable audit trails** across R&D environments, manufacturing execution systems (MES), and regulatory submission workflows.

### 5.6.2 Protect High-Value Intellectual Property and Clinical Data

Small molecule, biologics, vaccine, gene, and cell therapy programs generate proprietary assets that are highly attractive to cyber-espionage and insider threats. All design files, genomic data, and process parameters should be encrypted at rest and in transit, with **role-based permissions**, **multi-factor authentication**, and **continuous monitoring**. Cloud services used for molecular modeling or collaboration must be vetted for compliance and configured to least-privilege standards.

### 5.6.3 Harden Manufacturing and Supply Chain Systems

Manufacturing OT environments... including SCADA, MES, and DCS... must be **segmented**<sup>430</sup> from corporate IT networks and equipped with intrusion detection tuned for industrial protocols. Supplier and CMO qualification should include **cybersecurity maturity assessments**, contractual **breach notification** SLAs, and regular audits. Serialization, cold chain monitoring, and distribution systems should be protected with secure firmware, encrypted telemetry, and real-time anomaly detection.

### 5.6.4 Ensure Regulatory Compliance Without Security Trade-offs

Compliance with **FDA**, **EMA**, **ICH**, and other frameworks must be paired with robust data integrity controls to prevent tampering or unauthorized access. Submission platforms and GMP/LIMS environments should be validated against applicable regulatory requirements, with **encryption**, **secure authentication**, and **immutable audit logs**. Regulatory mock audits should include cybersecurity readiness evaluations.

### 5.6.5 Strengthen Collaboration and Third-Party Risk Management

Pharmaceutical R&D and manufacturing are inherently collaborative. Secure, **federated identity management**<sup>431</sup> and encrypted data exchange protocols must be standard for all CROs, CMOs, and research partners. Contracts should clearly define security obligations, data ownership, and **breach notification** procedures.

### 5.6.6 Enhance Pharmacovigilance Resilience and Data Integrity

PV systems must operate on secure, validated platforms that encrypt all safety data and enforce strict access control. Disaster recovery capabilities are essential to maintain continuous adverse event reporting. Outsourced PV partners should be regularly audited for both compliance and security performance.

<sup>430</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>431</sup> [https://en.wikipedia.org/wiki/Federated\\_identity](https://en.wikipedia.org/wiki/Federated_identity)

## 6 Healthcare Industry Group

The Healthcare industry, while *narrower* by definition than the broader Healthcare “Sector” (the scope for this entire paper), is still an expansive and highly interdependent ecosystem, encompassing hospitals, health systems, primary and specialty care providers, public health agencies, and a growing array of digital health services. It handles some of the most sensitive and regulated data of any industry... Protected Health Information (PHI)... while operating in environments where safety, privacy, and operational continuity are equally critical. Any security incident can have direct, life-threatening consequences for patients, making resilience a top priority.

### 6.1 Industry Group-Specific Challenges

**Cybersecurity threats** are intensified by the diversity of systems in use, from legacy medical devices and electronic health record (EHR) platforms to cloud-hosted telehealth portals and AI-enabled diagnostic tools. Many healthcare organizations operate on constrained budgets, resulting in outdated infrastructure, incomplete patching, and insufficient **segmentation** between clinical, administrative, and public-facing networks. Ransomware, phishing, and insider threats remain the leading attack vectors, often exploiting these systemic weaknesses.

**Privacy challenges** extend beyond basic compliance with **HIPAA**, **GDPR**, and other regional laws. Healthcare organizations must manage complex data-sharing arrangements with insurers, research partners, technology vendors, and public health authorities. The expansion of telehealth and mobile health applications has blurred the lines between regulated medical data and consumer health data, often creating compliance gaps and unclear accountability for data stewardship.

**Operational continuity risks** are also acute. Hospitals and health systems depend on uninterrupted access to EHRs, imaging systems, laboratory networks, and medication administration records. A cyberattack that disables these systems can delay treatment, disrupt surgeries, or compromise emergency response capabilities. Additionally, the supply chain for critical medical equipment, pharmaceuticals, and personal protective equipment (PPE) remains vulnerable to both physical and cyber disruption, as demonstrated during the COVID-19 pandemic.

To address these challenges, healthcare organizations must adopt integrated governance approaches that combine cybersecurity, privacy, and operational risk management into a unified framework. This includes aligning with **NIST Cybersecurity Framework (CSF)**<sup>432</sup> guidelines, industry-specific best practices from **Health-ISAC**<sup>433</sup>, and medical device security guidance from the **FDA** and **IEC 80001**<sup>434</sup> standards.

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<sup>432</sup> <https://www.nist.gov/cyberframework>

<sup>433</sup> <https://health-isac.org/>

<sup>434</sup> <https://www.iso.org/standard/72026.html>

## 6.2 Healthcare Delivery

The Healthcare Delivery industry... encompassing hospitals, clinics, outpatient centers, telemedicine providers, and integrated care networks... focuses on providing direct patient care, managing clinical workflows, and coordinating health services across diverse populations. This sector generates and handles vast amounts of sensitive information, including electronic health records (EHRs), diagnostic results, treatment plans, and billing data, making it a prime target for cybercriminals, ransomware attackers, and insider threats.

Key information security and privacy challenges include protecting regulated patient data under HIPAA, GDPR, and other regional privacy frameworks, securing interconnected medical devices and health IT systems, and managing access across a wide range of users and care settings.

Cyber resilience is further strained by the need to maintain uninterrupted clinical operations, ensure the integrity and availability of critical patient information, and safeguard complex supply chains and telehealth platforms, where any disruption or compromise can directly impact patient safety, trust, and healthcare outcomes.

The following sections dive deeper into specific challenges and recommendations for some of the sub-industries within this industry.

### 6.2.1 Hospitals & Health Systems

Hospitals and integrated health systems operate some of the most complex technology environments in any industry, balancing patient care delivery, research, administration, and regulatory compliance. The technology stack includes electronic health record (EHR) platforms, picture archiving and communication systems (PACS), laboratory information systems (LIS), connected medical devices, and an expanding array of cloud-based and mobile health applications. Many of these systems are interconnected, but not always well-**segmented**<sup>435</sup>, meaning that a single compromised endpoint can lead to **lateral movement** across critical *clinical* and *administrative* functions.

#### 6.2.1.1 Challenges

Cybersecurity incidents in hospitals can have direct patient safety implications. Ransomware attacks have been known to delay surgeries, disrupt diagnostic testing, and force manual charting, increasing the risk of medical errors. Legacy medical devices... often running outdated operating systems... cannot always be patched quickly, yet remain connected to hospital networks, creating a persistent vulnerability. In many regions, staffing and budget constraints mean that hospitals operate with understaffed IT security teams, making them more reactive than proactive in addressing emerging threats.

Hospitals also face heightened **privacy challenges** due to the breadth of PHI they manage. This includes not only inpatient and outpatient medical records but also diagnostic images, prescription histories, and, increasingly, genomic data. Regulatory requirements such as **HIPAA**, **HITECH**, **GDPR**, and state-level privacy laws mandate strict controls, but maintaining compliance across a diverse and fast-changing IT environment is resource-intensive.

#### 6.2.1.2 Recommendations

Hospitals and health systems should adopt a **zero-trust architecture**<sup>436</sup>, **segmenting networks**<sup>437</sup> to isolate clinical systems, medical devices, and administrative systems from each other. Access to EHR and other PHI repositories should be governed by multi-factor authentication and least-privilege principles. Continuous monitoring should be

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<sup>435</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>436</sup> [https://csrc.nist.gov/glossary/term/zero\\_trust\\_architecture](https://csrc.nist.gov/glossary/term/zero_trust_architecture)

<sup>437</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

deployed across all endpoints, with behavioral analytics to detect anomalous activity that could indicate insider threats or compromised accounts.

Legacy device risks can be mitigated by implementing network access controls, isolating unpatchable devices on VLANs, and using compensating controls such as virtual patching via intrusion prevention systems. Regular tabletop exercises should test cyber incident response capabilities, with specific scenarios involving ransomware and medical device compromise.

Finally, governance programs should integrate **cybersecurity, privacy, and operational continuity** planning into a single framework. This means aligning business continuity planning with disaster recovery for IT systems, and ensuring that downtime procedures are well-practiced by clinical staff. Collaboration with Health-ISAC<sup>438</sup> and public health agencies will improve situational awareness and accelerate threat mitigation across the healthcare ecosystem.

#### 6.2.1.3 References

- **NIST Cybersecurity Framework (CSF)**<sup>439</sup> – Healthcare Profiles
- **HIPAA Security**<sup>440</sup> and **Privacy**<sup>441</sup> Rules
- **GDPR** – Special Category<sup>442</sup> Data Protections
- **FDA Guidance on Medical Device Cybersecurity**<sup>443</sup>
- **IEC 80001**<sup>444</sup> – Risk Management for IT Networks Incorporating Medical Devices

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<sup>438</sup> <https://health-isac.org/>

<sup>439</sup> <https://www.nist.gov/cyberframework>

<sup>440</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>441</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>442</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>443</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cybersecurity-medical-devices-quality-system-considerations-and-content-premarket-submissions>

<sup>444</sup> <https://www.iso.org/standard/72026.html>

## 6.2.2 Primary Care

Primary care practices are the first point of contact for most patients and manage a wide range of health data... preventive screenings, diagnostic results, chronic disease management records, and referral information. They often operate with smaller IT budgets and fewer dedicated security staff than large hospitals, making them appealing targets for cybercriminals. Threats include ransomware, phishing attacks, and theft of electronic health record (EHR) credentials, which can expose large volumes of Protected Health Information (PHI).

### 6.2.2.1 Challenges

The shift toward value-based care models has increased data-sharing requirements between primary care providers, specialists, payers, and public health agencies. While this improves care coordination, it also expands the attack surface. Interoperability frameworks like **HL7**<sup>445</sup> and **FHIR**<sup>446</sup> enable structured data exchange but can be exploited if APIs are poorly secured or access is insufficiently controlled. Additionally, the rise of patient portals and telehealth services in primary care introduces risks from insecure authentication, device compromise, or unencrypted data transmission.

Primary care providers are also increasingly targeted for **insurance fraud schemes**. Compromised systems can be used to alter billing records, create false claims, or harvest patient identities for misuse. Given that these practices often serve as the gateway to a patient's broader health history, a breach at the primary care level can have ripple effects throughout the patient's healthcare journey.

### 6.2.2.2 Recommendations

Primary care practices should adopt **managed security services** or partnerships with health IT vendors to offset staffing limitations. Multi-factor authentication (MFA) should be enforced for all EHR access, and endpoint protection tools should be deployed on all clinician and administrative devices. Patient portal and telehealth platforms must support strong authentication and encrypt all session data.

Data exchange with external partners via HL7 or FHIR should be secured with mutual TLS, API authentication keys, and strict role-based permissions. Regular vulnerability scans and penetration tests should be conducted to identify and address weaknesses in both on-premise systems and hosted services.

Finally, staff training should emphasize **phishing prevention**, **secure handling** of patient data, and **prompt reporting** of suspicious activity. **Incident response plans** should be adapted to the scale of the practice but must include clear **breach notification** procedures, data restoration steps, and coordination with affected patients and partners.

### 6.2.2.3 References

- **HIPAA Privacy**<sup>447</sup> and **Security**<sup>448</sup> Rules
- **HITECH Act – Breach Notification**<sup>449</sup> Requirements
- **GDPR – Special Category**<sup>450</sup> Data Protections
- **NIST Cybersecurity Framework (CSF)**<sup>451</sup> – Healthcare Implementation Guide
- **ONC Cures Act Final Rule**<sup>452</sup> – Interoperability and Information Blocking

<sup>445</sup> <https://www.hl7.org/>

<sup>446</sup> <https://www.hl7.org/fhir/overview.html>

<sup>447</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>448</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>449</sup> <https://www.hhs.gov/hipaa/for-professionals/breach-notification/index.html>

<sup>450</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>451</sup> <https://www.nist.gov/cyberframework>

<sup>452</sup> <https://www.healthit.gov/topic/oncs-cures-act-final-rule>



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### 6.2.3 Specialty Care (Oncology Centers, Cardiology Clinics, etc.)

Specialty care facilities focus on high-complexity, high-value treatments in areas such as oncology, cardiology, neurology, orthopedics, and other subspecialties. These organizations manage some of the most detailed and sensitive patient data, including genomic information, advanced imaging, specialized laboratory tests, and longitudinal treatment records. The aggregation of such precise health data creates significant **privacy risks**... breaches can lead to rapid patient re-identification even from de-identified datasets.

#### 6.2.3.1 Challenges

Many specialty care centers operate advanced medical devices and treatment systems... such as linear accelerators for radiation therapy, robotic surgical platforms, or implantable cardiac device programmers... that are deeply integrated into the clinical workflow. These devices often rely on proprietary software, remote vendor support, and network connectivity, creating additional cybersecurity vulnerabilities. Disruption or compromise of these systems can directly impact patient safety and treatment outcomes.

Because specialty care often involves multi-disciplinary teams and complex care coordination, there is a heavy reliance on interoperability between EHR modules, diagnostic systems, and external research or registry databases. Poorly secured APIs, inconsistent identity management, and lack of **segmentation**<sup>453</sup> between *clinical* and *research* networks can lead to unauthorized access or data leakage. Specialty care facilities may also be targeted for **intellectual property theft** in cases where they participate in clinical research, hold trial data, or pioneer new treatment protocols.

#### 6.2.3.2 Recommendations

Specialty care providers should implement **micro-segmentation**<sup>454</sup> to isolate critical medical devices and treatment systems from broader IT networks. All devices and associated control systems should be patched regularly, with compensating controls for those that cannot be updated. Vendor remote access must be protected with multifactor authentication, VPN restrictions, and detailed activity logging.

Data-sharing agreements with research partners, registries, and other care providers should mandate encryption, access controls, and breach reporting requirements. Where genomic or other highly identifying datasets are used, privacy-preserving techniques... such as differential privacy or secure multi-party computation... should be considered to mitigate re-identification risks.

Staff training should emphasize both cybersecurity hygiene and incident response readiness, with drills simulating treatment system outages. Specialty centers should also join industry-specific intelligence-sharing networks, such as Health-ISAC<sup>455</sup>, to receive alerts on vulnerabilities affecting specialized clinical technologies and emerging threats targeting niche care providers.

#### 6.2.3.3 References

- **HIPAA Security**<sup>456</sup> and **Privacy**<sup>457</sup> Rules
- **FDA** Guidance on Medical Device Cybersecurity
- **NIST Cybersecurity Framework** – Healthcare Profiles
- **GDPR** – Special Category<sup>458</sup> Data Protections

<sup>453</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>454</sup> [https://en.wikipedia.org/wiki/Microsegmentation\\_\(network\\_security\)](https://en.wikipedia.org/wiki/Microsegmentation_(network_security))

<sup>455</sup> <https://health-isac.org/>

<sup>456</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>457</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>458</sup> <https://gdpr-info.eu/art-9-gdpr/>

- **ISO/IEC 27001<sup>459</sup>** – Information Security Management Systems

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<sup>459</sup> <https://www.iso.org/standard/27001>

## 6.2.4 Telehealth & Virtual Care

Telehealth and virtual care platforms have transformed access to healthcare, enabling real-time consultations, remote diagnostics, and ongoing patient monitoring across geographical boundaries. However, this shift has significantly expanded the attack surface. Telehealth sessions often rely on consumer-grade devices, public internet connections, and cloud-hosted platforms, all of which introduce varying levels of security maturity and exposure to cyber threats.

### 6.2.4.1 Challenges

The exchange of Protected Health Information (PHI) over video conferencing, chat, and integrated EHR portals raises **privacy risks**, especially if encryption is absent or improperly configured. Weak identity verification methods can allow impersonation of patients or providers, potentially leading to fraudulent billing, medical identity theft, or unauthorized prescription issuance. The integration of remote monitoring devices... ranging from wearable ECG monitors to at-home diagnostic kits... further complicates the environment, as each device can be a potential point of compromise.

From a regulatory perspective, telehealth providers must comply not only with **HIPAA** and **HITECH** in the U.S., but also with **GDPR**, local data sovereignty laws, and industry-specific telemedicine regulations. Because telehealth often crosses jurisdictional borders, compliance frameworks must address conflicting laws and ensure that data is stored, processed, and transferred in accordance with the strictest applicable requirements.

### 6.2.4.2 Recommendations

Telehealth platforms must use **end-to-end encryption** for all audio, video, and data streams, with keys managed securely and independently from platform providers where feasible. Strong authentication... preferably multifactor... should be required for both patients and providers. Secure session initiation protocols can prevent hijacking or unauthorized entry into telehealth meetings.

Integration between telehealth applications and EHR systems should use secure APIs with mutual authentication and access logging. Remote monitoring devices must be vetted for cybersecurity compliance, use signed firmware, and transmit data over encrypted channels.

Providers should also establish **patient awareness programs** to educate users about device hygiene, secure connections, and recognizing fraudulent telehealth solicitations. **Incident response plans** should account for rapid **containment** of compromised accounts or devices, and contracts with telehealth vendors should include security SLAs, **breach notification** timelines, and clear **data ownership** terms.

### 6.2.4.3 References

- **HIPAA Privacy**<sup>460</sup> and **Security**<sup>461</sup> Rules
- **HITECH Act – Breach Notification**<sup>462</sup> Provisions
- **GDPR – Cross-Border Data Transfer**<sup>463</sup> Rules
- **ISO/IEC 27018** – Protection of PII in Public Clouds
- **NIST Cybersecurity Framework (CSF)**<sup>464</sup> – Telehealth Profiles

<sup>460</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>461</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>462</sup> <https://www.hhs.gov/hipaa/for-professionals/breach-notification/index.html>

<sup>463</sup> <https://gdpr-info.eu/chapter-5/>

<sup>464</sup> <https://www.nist.gov/cyberframework>

## 6.3 Public Health

The Public Health industry... comprising government health agencies, epidemiological research organizations, and community health programs... focuses on monitoring, preventing, and managing population-level health risks, including infectious diseases, chronic conditions, and environmental hazards. It collects and analyzes vast quantities of sensitive data, such as patient demographics, vaccination records, disease surveillance reports, and genomic information, making it a prime target for cyberattacks, misinformation campaigns, and data manipulation.

Key information security and privacy challenges include safeguarding personal health information under HIPAA, GDPR, and other privacy regulations, protecting large-scale public health databases, and ensuring secure communication across local, national, and international health networks.

Cyber resilience is further tested by the need to maintain uninterrupted disease monitoring and response capabilities, defend against ransomware and infrastructure attacks, and ensure the integrity and availability of data that inform critical public health decisions, particularly during emergencies and pandemics.

The following sections dive deeper into specific challenges and recommendations for some of the sub-industries within this industry.

### 6.3.1 Epidemiology

Epidemiology is the cornerstone of public health, focusing on the distribution, patterns, and determinants of health events in populations. Modern epidemiological work depends heavily on digital systems for surveillance, data collection, modeling, and analysis. This includes case reporting platforms, laboratory information systems, syndromic surveillance tools, and geographic information system (GIS) mapping of outbreaks. Because these datasets often include Protected Health Information (PHI) or personally identifiable information (PII), they are subject to strict privacy regulations such as **HIPAA**, **GDPR**, and various national public health laws.

#### 6.3.1.1 Challenges

Cybersecurity threats to epidemiological systems range from ransomware attacks on health departments to targeted breaches of disease surveillance platforms. These can result in data loss, manipulation of case counts, or delays in reporting... potentially undermining outbreak response and public trust. Nation-state actors may also target epidemiological datasets for intelligence purposes, particularly during high-profile health crises such as pandemics.

The **data-sharing challenge** in epidemiology is acute: effective public health response often requires rapid, large-scale data exchange between hospitals, laboratories, government agencies, and international partners. However, this must be balanced with the protection of sensitive personal data and compliance with varying jurisdictional laws. Inconsistent security practices among partners, combined with the urgency of outbreak response, can lead to rushed integrations and increased vulnerabilities.

#### 6.3.1.2 Recommendations

Epidemiological data systems should be deployed on secure, access-controlled platforms with encryption for both data in transit and at rest. Identity and access management should include multi-factor authentication for all users and detailed logging of access to sensitive datasets.

Data-sharing agreements between epidemiological partners must include explicit security requirements, **breach notification** clauses, and **data minimization** principles<sup>465</sup> to reduce unnecessary exposure of personal identifiers. When possible, privacy-enhancing technologies such as differential privacy or secure multiparty computation should be used to enable collaborative analysis without exposing raw data.

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<sup>465</sup> [https://en.wikipedia.org/wiki/Data\\_minimization](https://en.wikipedia.org/wiki/Data_minimization)

**Incident response plans** for public health agencies **should include cyber scenarios** that could impact outbreak reporting or disease modeling. These should be **tested regularly**, alongside continuity of operations (COOP) exercises, to **ensure resilience** under real-world pressure. Participation in public health information-sharing networks, both national and international, can enhance **threat awareness** and accelerate response to security incidents affecting epidemiological systems.

#### 6.3.1.3 *References*

- **International Health Regulations (IHR)**<sup>466</sup> – World Health Organization
- **CDC National Notifiable Diseases Surveillance System (NNDSS)**
- **ISO/IEC 27001**<sup>467</sup> – Information Security Management Systems
- **GDPR** – Public Interest & Health Data Provisions
- **NIST Cybersecurity Framework (CSF)**<sup>468</sup>

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<sup>466</sup> <https://www.who.int/health-topics/international-health-regulations>

<sup>467</sup> <https://www.iso.org/standard/27001>

<sup>468</sup> <https://www.nist.gov/cyberframework>

## 6.3.2 Health Promotion & Disease Prevention

Health promotion and disease prevention programs aim to improve population health outcomes through education, policy, community engagement, and preventive healthcare services. These initiatives rely on sensitive data from multiple sources, including patient screenings, immunization records, community health surveys, and behavioral health assessments. Because these datasets often contain personally identifiable information (PII) and protected health information (PHI), they are subject to privacy and security obligations under laws such as **HIPAA**, **GDPR**, and local public health statutes.

### 6.3.2.1 Challenges

Cyber threats to prevention programs often target centralized health information systems, vaccination registries, or outreach databases. Malicious actors may attempt to access these systems for identity theft, to disrupt vaccination campaigns, or to spread misinformation. Public health campaigns that rely on online platforms and social media for engagement are also vulnerable to disinformation attacks that can erode trust in preventive measures.

The multi-industry nature of disease prevention... requiring collaboration between healthcare providers, schools, employers, public health agencies, and NGOs... creates a broad and varied network of data-sharing relationships. Without consistent security standards and oversight, these partnerships can expose sensitive health data to unauthorized access or misuse. In **cross-border** health promotion programs, jurisdictional differences in privacy regulation can further complicate compliance.

### 6.3.2.2 Recommendations

Organizations involved in health promotion and disease prevention should implement **role-based access control** for all health-related data, with encryption for storage and transmission. Data-sharing agreements should define permitted uses, retention periods, and **breach notification** requirements, ensuring that all partners follow equivalent security protocols.

Campaign management platforms... especially those involving direct patient outreach... should undergo regular security testing to identify vulnerabilities. Public-facing communication should include counter-disinformation strategies, particularly for vaccination and screening initiatives that are common targets for false narratives.

Community-level programs should adopt **privacy-by-design**<sup>469</sup> principles, minimizing the collection of identifiable data and using aggregated or anonymized datasets whenever possible. Regular training for all staff and partners on data protection, consent management, and incident reporting will help maintain trust and compliance while enabling effective preventive care delivery.

### 6.3.2.3 References

- **WHO** – Health Promotion Glossary & Framework
- **CDC** – National Prevention Strategy
- **ISO/IEC 27001**<sup>470</sup> – Information Security Management Systems
- **GDPR** – Public Health and Preventive Care Exemptions
- **NIST Cybersecurity Framework (CSF)**<sup>471</sup>

<sup>469</sup> [https://en.wikipedia.org/wiki/Privacy\\_by\\_design](https://en.wikipedia.org/wiki/Privacy_by_design)

<sup>470</sup> <https://www.iso.org/standard/27001>

<sup>471</sup> <https://www.nist.gov/cyberframework>

### 6.3.3 Vaccination Programs

Vaccination programs... whether routine childhood immunizations, seasonal flu campaigns, or emergency mass vaccination efforts... are critical to population health. These programs rely on large-scale data collection and distribution infrastructure, including immunization information systems (IIS), patient scheduling platforms, cold chain logistics, and national vaccine registries. Because these systems store personally identifiable information (PII), protected health information (PHI), and vaccine-specific tracking data, they are prime targets for cyberattacks.

#### 6.3.3.1 Challenges

The risks extend across multiple fronts: ransomware can disable IIS platforms or appointment scheduling systems, delaying vaccination efforts; targeted breaches can expose sensitive patient data and undermine public trust; and misinformation campaigns can erode vaccine confidence, reducing uptake. IoT-enabled cold chain monitoring devices, if compromised, can falsify temperature logs, potentially resulting in the administration of compromised doses. These risks are heightened in emergency deployments, where speed often takes priority over long-term security hardening.

**Cross-border** vaccination initiatives introduce additional complexity. Jurisdictional variations in privacy laws, public health reporting requirements, and data-sharing protocols can hinder effective and secure coordination. International partnerships may also face targeted espionage from nation-state actors seeking to collect epidemiological data or disrupt vaccine distribution for political leverage.

#### 6.3.3.2 Recommendations

Vaccination program platforms should employ **role-based access control**, multi-factor authentication, and encryption of all patient and vaccination data in transit and at rest. National and regional IIS systems should be **segmented**<sup>472</sup> from other public health networks and monitored continuously for anomalous access patterns.

Cold chain devices must use signed firmware, encrypted telemetry, and redundant monitoring to prevent tampering or falsification of temperature data. Partnerships with logistics providers should include security and **breach notification** clauses, and regular audits of their cybersecurity posture.

Public communication strategies should include active counter-misinformation measures, combining real-time monitoring of social media narratives with trusted information campaigns. For international programs, formalized data-sharing agreements should establish uniform security standards, consent protocols, and breach response procedures to ensure both compliance and operational trust.

#### 6.3.3.3 References

- **WHO** – Immunization in Practice Guidelines
- **CDC** – Immunization Information Systems (IIS) Standards
- **EU GDPR** – Health Data Provisions
- **ISO 28000**<sup>473</sup> – Security Management Systems for the Supply Chain
- **NIST Cybersecurity Framework** (CSF)<sup>474</sup>

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<sup>472</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>473</sup> <https://www.iso.org/standard/79612.html>

<sup>474</sup> <https://www.nist.gov/cyberframework>



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### 6.3.4 Health Policy & Administration

Health policy and administration oversee the governance, financing, and strategic direction of public health systems. This includes policymaking, budgeting, regulatory compliance, workforce management, and the implementation of public health initiatives at local, regional, and national levels. These functions rely on large-scale administrative datasets... personnel records, budgetary and procurement information, strategic plans, and performance metrics... which often contain sensitive PII and are attractive targets for cyber-espionage and politically motivated attacks.

#### 6.3.4.1 Challenges

Cyber threats in this space range from ransomware and phishing targeting government health departments to advanced persistent threats (APTs) seeking intelligence on national health priorities, regulatory strategies, or vaccine procurement contracts. Attacks can disrupt critical administrative functions, delay policy implementation, and undermine public trust in health governance. The use of shared administrative platforms across multiple agencies also creates a high-value target for attackers aiming to gain broad access with a single compromise.

Policy formulation increasingly relies on integrated health and social data, often involving inter-agency and cross-industry data sharing. While this enables evidence-based policymaking, it also magnifies privacy and compliance challenges... especially when linking health data to education, housing, or social services datasets. Jurisdictional differences in privacy laws and government transparency rules can further complicate secure handling.

#### 6.3.4.2 Recommendations

Health policy and administrative systems should be secured using **defense-in-depth** strategies, including **network segmentation**<sup>475</sup>, privileged access management, multi-factor authentication, and continuous security monitoring. Sensitive policy documents and procurement data should be encrypted in transit and at rest, with granular access control based on role and clearance level.

Data-sharing agreements between agencies must clearly define permitted uses, retention limits, and **breach notification** procedures. Privacy-enhancing technologies... such as secure multi-party computation... can enable data linkage for policy analysis without exposing raw datasets.

Governance bodies should conduct regular cyber risk assessments and scenario-based continuity exercises to test the resilience of administrative systems. Incident response and crisis communication plans must be established to address both cyber disruptions and reputational threats from policy-related data breaches. Collaboration with national CERTs and intergovernmental cybersecurity networks will help ensure timely detection and mitigation of threats targeting health administration functions.

#### 6.3.4.3 References

- **WHO** – Health System Governance Framework
- **ISO/IEC 27001**<sup>476</sup> – Information Security Management Systems
- **GDPR** – Public Industry Data Provisions
- **NIST Cybersecurity Framework (CSF)**<sup>477</sup>
- **OECD** – Digital Government Policy Framework

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<sup>475</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>476</sup> <https://www.iso.org/standard/27001>

<sup>477</sup> <https://www.nist.gov/cyberframework>

## 6.4 Healthcare IT

The Healthcare IT industry... encompassing electronic health record (EHR) systems, health information exchanges, telehealth platforms, medical software, and cloud-based health analytics... enables the digital management, storage, and exchange of patient and clinical data across the healthcare ecosystem. This sector handles vast volumes of sensitive and regulated information, including personal health records, diagnostic data, treatment histories, and billing information, making it a prime target for cybercriminals, ransomware attacks, and insider threats.

Key information security and privacy challenges include protecting patient data under HIPAA, GDPR, and other regulatory frameworks, securing interoperable systems and APIs that connect diverse healthcare providers, and managing access controls across multiple user roles.

Cyber resilience is further tested by the need to maintain continuous uptime for critical healthcare applications, safeguard against sophisticated cyberattacks, ensure data integrity in distributed environments, and balance rapid innovation with robust security practices in an industry where downtime or data compromise can directly affect patient care and safety.

The following sections dive deeper into specific challenges and recommendations for some of the sub-industries within this industry.

### 6.4.1 Electronic Health Records (EHR) / Health Information Exchange (HIE)

Electronic Health Records (EHR) are the backbone of modern healthcare operations, consolidating patient demographics, clinical histories, diagnostic results, treatment plans, and billing information. Health Information Exchanges (HIEs) facilitate the secure sharing of these records across organizations, enabling care coordination and reducing duplication of services. Because EHRs and HIEs contain complete longitudinal patient records, they are prime targets for cyberattacks, with the potential for large-scale breaches exposing millions of records in a single incident.

#### 6.4.1.1 Challenges

Cyber risks include ransomware attacks that encrypt or exfiltrate entire patient databases, credential theft that grants attackers persistent access to clinical systems, and data manipulation that can alter patient care. EHR systems often integrate with numerous other applications... clinical decision support tools, imaging archives, pharmacy systems... which can increase the attack surface if integration points are not secured. HIEs face similar threats, with the added complexity of connecting disparate IT environments across multiple healthcare entities with varying levels of cybersecurity maturity.

Privacy compliance is another major challenge. In the U.S., **HIPAA** and the **HITECH Act** require strict safeguards for PHI, while the **GDPR** imposes additional requirements for organizations processing EU citizens' health data. **Cross-border HIE**<sup>478</sup> participation may involve conflicting privacy obligations and require tailored data governance policies to ensure lawful transfers.

#### 6.4.1.2 Recommendations

EHR and HIE environments should adopt **zero-trust principles**<sup>479</sup>, enforcing multi-factor authentication for all access, granular role-based permissions, and continuous monitoring for anomalous behavior. Data at rest and in transit should be encrypted using strong, up-to-date algorithms.

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<sup>478</sup> <https://www.healthit.gov/topic/health-it-and-health-information-exchange-basics/what-hie>

<sup>479</sup> [https://csrc.nist.gov/glossary/term/zero\\_trust\\_architecture](https://csrc.nist.gov/glossary/term/zero_trust_architecture)

Integration between EHRs and external systems should occur through secure APIs with mutual authentication, encrypted channels, and strict input/output validation to prevent injection or manipulation attacks. HIE participants should be required to meet minimum cybersecurity standards before connecting to the exchange.

Routine vulnerability scanning, penetration testing, and third-party security assessments should be standard practice. Organizations should also implement disaster recovery and business continuity plans tailored to clinical environments, ensuring rapid restoration of EHR access in the event of an outage or cyberattack. Finally, patient access portals must be secured with robust authentication and session management controls, given their increasing role in patient engagement and care transparency.

#### 6.4.1.3 References

- **HIPAA Security<sup>480</sup> and Privacy<sup>481</sup> Rules**
- **HITECH Act** – Health Information Technology for Economic and Clinical Health
- **GDPR** – Special Category<sup>482</sup> Data Provisions
- **ONC Cures Act Final Rule<sup>483</sup>** – Information Blocking & Interoperability
- **NIST Cybersecurity Framework (CSF)<sup>484</sup>** – Healthcare Profiles

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<sup>480</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>481</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>482</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>483</sup> <https://www.healthit.gov/topic/oncs-cures-act-final-rule>

<sup>484</sup> <https://www.nist.gov/cyberframework>

## 6.4.2 Clinical Decision Support Systems (CDSS)

Clinical Decision Support Systems (CDSS) assist healthcare providers in making diagnostic, therapeutic, and care management decisions by analyzing patient data and delivering evidence-based recommendations. These tools are often embedded within or integrated with Electronic Health Record (EHR) platforms and may leverage AI/ML algorithms, clinical guidelines, and predictive analytics. Because they directly influence patient care, any compromise in a CDSS can lead to harmful clinical decisions, regulatory violations, and loss of clinician trust.

### 6.4.2.1 Challenges

Key risks include manipulation of decision-support algorithms, unauthorized modification of clinical rules, or data poisoning that skews recommendations. Integration with external data sources... such as lab information systems, drug databases, or public health feeds... introduces dependencies that, if compromised, could propagate false or incomplete information across multiple clinical sites. The use of AI models in CDSS also raises concerns about transparency, explainability, and bias, especially if training datasets are not secure or representative.

From a privacy perspective, CDSS typically processes highly sensitive patient data in real time, making it subject to **HIPAA**, **GDPR**, and other health data protection regulations. If hosted in the cloud, secure transmission, storage, and key management become critical to preventing breaches.

### 6.4.2.2 Recommendations

Healthcare organizations should require **code signing**, version control, and integrity checks for all CDSS software components. Any changes to clinical rules or algorithms must go through a formal change control process with documented review and approval. AI-enabled CDSS should include monitoring for drift in model performance and automated alerts for anomalous recommendations.

**Network segmentation**<sup>485</sup> and **role-based access controls** should be implemented to ensure that only authorized staff can configure or update CDSS logic. All patient data flowing into or out of the CDSS must be encrypted in transit and at rest, with strict key management policies.

Vendors should be subject to rigorous security assessments, including penetration testing of CDSS interfaces and API integrations. Where CDSS is cloud-hosted, ensure that the provider meets applicable healthcare security certifications (e.g., HITRUST CSF, ISO 27001<sup>486</sup>) and supports logging, auditing, and forensic capabilities.

### 6.4.2.3 References

- **ISO/IEC 62304**<sup>487</sup> – Software Lifecycle Processes for Medical Devices
- **FDA** Guidance on Clinical Decision Support Software<sup>488</sup>
- **HIPAA** Privacy<sup>489</sup> and Security<sup>490</sup> Rules
- **GDPR** – Special Category<sup>491</sup> Data Processing
- **NIST SP 800-53**<sup>492</sup> – Security and Privacy Controls

<sup>485</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>486</sup> <https://www.iso.org/standard/27001>

<sup>487</sup> <https://www.iso.org/standard/38421.html>

<sup>488</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/clinical-decision-support-software>

<sup>489</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>490</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>491</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>492</sup> <https://csrc.nist.gov/pubs/sp/800/53/r5/upd1/final>

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### 6.4.3 AI in Healthcare Diagnostics

AI-powered healthcare diagnostics leverage machine learning models, deep neural networks, and advanced image recognition to interpret medical images, pathology slides, lab results, and patient data. These tools have demonstrated the potential to detect diseases earlier, increase diagnostic accuracy, and streamline clinician workflows. However, the adoption of AI in diagnostics brings unique **security, privacy, and ethical challenges**.

#### 6.4.3.1 Challenges

AI models are susceptible to **adversarial attacks**... maliciously crafted inputs that cause misclassification or incorrect predictions. Training data poisoning is another risk, where attackers manipulate the datasets used to train diagnostic models, potentially embedding systematic errors that degrade performance or bias outputs. Additionally, intellectual property theft of proprietary AI models is a growing concern, as these models represent significant R&D investments.

From a privacy standpoint, AI diagnostic systems often process vast amounts of PHI, including high-resolution medical images, genomic data, and clinical histories. If hosted in the cloud or integrated across multiple institutions, this data is exposed to risks from insecure transfer, misconfigured storage, or insufficient anonymization. Furthermore, regulatory uncertainty around explainability and bias in AI models can create compliance risks under **HIPAA, GDPR**, and emerging AI-specific legislation.

#### 6.4.3.2 Recommendations

AI diagnostic systems should incorporate **robust model security practices**, including adversarial testing, input validation, and continuous monitoring for performance drift. Access to training datasets and trained models must be tightly controlled, with encryption at rest and in transit, and strong authentication for all authorized users.

Data governance should ensure that all PHI used for AI training or inference complies with applicable privacy laws and undergoes de-identification or pseudonymization where possible. Audit trails should record all model training events, parameter changes, and access to datasets or models.

Vendors should be vetted for adherence to healthcare AI standards, with clear SLAs on vulnerability management, explainability, and bias mitigation. Finally, organizations should establish an AI governance board... including clinicians, data scientists, and compliance experts... to oversee ethical deployment, ensure transparency, and align with evolving regulatory frameworks.

#### 6.4.3.3 References

- **FDA** Proposed Regulatory Framework for AI/ML-Based Software as a Medical Device (SaMD)<sup>493</sup>
- **ISO/IEC 23894**<sup>494</sup> – AI Risk Management
- **HIPAA** Privacy<sup>495</sup> and Security<sup>496</sup> Rules
- **GDPR** – Art. 22<sup>497</sup> on Automated Decision-Making & Profiling Provisions
- **NIST** AI Risk Management Framework<sup>498</sup>

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<sup>493</sup> [https://www.fda.gov/medical-devices/software-medical-device-samd/artificial-intelligence-software-medical-device?utm\\_source=chatgpt.com](https://www.fda.gov/medical-devices/software-medical-device-samd/artificial-intelligence-software-medical-device?utm_source=chatgpt.com)

<sup>494</sup> <https://www.iso.org/standard/77304.html>

<sup>495</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>496</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>497</sup> <https://gdpr-info.eu/art-22-gdpr/>

<sup>498</sup> <https://www.nist.gov/itl/ai-risk-management-framework>

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## 6.4.4 Digital Therapeutics

Digital therapeutics (DTx) are evidence-based software-driven interventions that prevent, manage, or treat medical disorders and diseases. Unlike general wellness apps, DTx products are regulated and often prescribed, meaning they handle clinical-grade patient data and are subject to medical device regulations. These platforms may deliver cognitive behavioral therapy, chronic disease management, medication adherence support, or rehabilitation programs through mobile apps, wearables, or web interfaces.

### 6.4.4.1 Challenges

Security challenges for DTx stem from their reliance on constant connectivity, frequent data synchronization with EHRs, and integration with connected medical devices. If compromised, attackers could alter therapy protocols, exfiltrate sensitive data, or disrupt the delivery of essential treatment. Many DTx solutions also use AI algorithms to personalize care, which creates additional risks from adversarial manipulation, model theft, or bias exploitation.

Privacy is a major concern, as DTx applications often collect and process sensitive personal health information, behavioral data, and sometimes even location data. This makes them subject to **HIPAA** in the U.S., **GDPR** in the EU, and similar frameworks worldwide. Inadequate consent processes, unclear data-sharing policies, or third-party tracking can lead to compliance violations and loss of patient trust.

### 6.4.4.2 Recommendations

DTx developers should follow **secure software development lifecycle (SDLC)**<sup>499</sup> practices, including **threat modeling**, code reviews, penetration testing, and secure update mechanisms. All patient data must be encrypted in transit and at rest, with strong authentication and role-based access controls for both patients and clinicians.

**Privacy-by-design** principles<sup>500</sup> should be embedded from the outset, ensuring that consent is informed, **data minimization**<sup>501</sup> is practiced, and third-party sharing is transparent and controlled. Integration with EHRs and medical devices should be through secure APIs with mutual authentication, encrypted channels, and rigorous input validation.

Manufacturers and providers should implement ongoing monitoring of DTx performance and security posture, including detection of abnormal usage patterns that may indicate compromise. Regular third-party audits, regulatory compliance reviews, and participation in health-industry threat intelligence networks will help maintain both regulatory alignment and patient trust.

### 6.4.4.3 References

- **FDA** Digital Health Innovation Action Plan<sup>502</sup>
- **ISO/IEC 82304-1**<sup>503</sup> – Health Software Product Safety Requirements
- **HIPAA** Security<sup>504</sup> and Privacy<sup>505</sup> Rules
- **GDPR** – Special Category<sup>506</sup> Data Protections
- **NIST Cybersecurity Framework (CSF)**<sup>507</sup> – Digital Health Profiles

<sup>499</sup> <https://www.eccouncil.org/cybersecurity-exchange/application-security/what-are-the-five-phases-of-the-secure-software-development-life-cycle/>

<sup>500</sup> [https://en.wikipedia.org/wiki/Privacy\\_by\\_design](https://en.wikipedia.org/wiki/Privacy_by_design)

<sup>501</sup> [https://en.wikipedia.org/wiki/Data\\_minimization](https://en.wikipedia.org/wiki/Data_minimization)

<sup>502</sup> <https://www.fda.gov/media/106331/download>

<sup>503</sup> <https://www.iso.org/standard/59543.html>

<sup>504</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>505</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>506</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>507</sup> <https://www.nist.gov/cyberframework>

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## 6.5 Healthcare Services

The Healthcare Services industry—covering a wide range of providers including hospitals, clinics, home health agencies, rehabilitation centers, and specialized care facilities—delivers essential medical care, diagnostic services, and patient support across diverse populations. This sector manages vast amounts of sensitive information, such as patient health records, treatment plans, insurance data, and operational metrics, making it a prime target for cyberattacks, ransomware, and insider threats.

Key information security and privacy challenges include protecting patient data under HIPAA, GDPR, and other regulatory frameworks, securing interconnected healthcare systems and medical devices, and managing access across multiple care settings and service providers.

Cyber resilience is further tested by the need to ensure uninterrupted delivery of critical healthcare services, maintain the integrity and availability of patient information, defend against evolving cyber threats, and safeguard complex operational and supply chain networks, where any disruption can directly impact patient safety, trust, and overall healthcare outcomes.

The following sections dive deeper into specific challenges and recommendations for some of the sub-industries within this industry.

### 6.5.1 Nursing & Allied Health

Nursing and allied health professionals are at the front lines of patient care, providing critical services in hospitals, outpatient clinics, rehabilitation centers, and community health settings. They frequently access and document care in Electronic Health Record (EHR) systems, coordinate with multidisciplinary teams, and use specialized clinical equipment and software. These workflows involve constant handling of Protected Health Information (PHI), making the nursing and allied health workforce a primary target for phishing, credential theft, and social engineering attacks.

#### 6.5.1.1 Challenges

Because these professionals are often mobile... moving between wards, patient homes, or multiple facilities... they rely heavily on portable devices such as laptops, tablets, and smartphones. Inadequate endpoint protection, weak authentication, or unsecured Wi-Fi use can create significant vulnerabilities. Additionally, many allied health disciplines (e.g., radiology, physical therapy, respiratory therapy) depend on connected medical devices that, if compromised, could disrupt care or risk patient safety.

The human factor is a persistent challenge. High workload, shift changes, and fast-paced environments can lead to lapses in cyber hygiene, such as leaving sessions open, sharing passwords, or bypassing security measures for convenience. Given the direct impact on care delivery, operational downtime from cyber incidents can have immediate patient safety consequences.

#### 6.5.1.2 Recommendations

Healthcare organizations should enforce **multi-factor authentication** for all nursing and allied health system access, with automatic logouts and device locking after periods of inactivity. Portable devices must be encrypted and protected with endpoint detection and response (EDR) solutions.

Clinical systems used by these professionals should be accessible only through secure, **segmented networks**<sup>508</sup>, with guest Wi-Fi traffic kept separate from clinical traffic. Specialized training programs should focus on phishing recognition, secure documentation practices, and safe handling of portable devices in clinical settings.

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<sup>508</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

Regular tabletop exercises involving nursing and allied health staff should simulate cyber incidents that affect care workflows, ensuring that downtime procedures are well-understood and that patient safety can be maintained during IT disruptions. Vendor management processes should also include security assessments for any third-party applications or devices used in allied health specialties.

#### 6.5.1.3 References

- **HIPAA Security<sup>509</sup> and Privacy<sup>510</sup> Rules**
- **GDPR – Special Category<sup>511</sup> Data Protections**
- **NIST Cybersecurity Framework (CSF)<sup>512</sup> – Healthcare Profiles**
- **ISO/IEC 27001<sup>513</sup> – Information Security Management Systems**
- **Joint Commission Standards for Information Management<sup>514</sup>**

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<sup>509</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>510</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>511</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>512</sup> <https://www.nist.gov/cyberframework>

<sup>513</sup> <https://www.iso.org/standard/27001>

<sup>514</sup> <https://www.jointcommission.org/en-us/knowledge-library/support-center/standards-interpretation/standards-faqs/000001462>

## 6.5.2 Rehabilitation

Rehabilitation services... including physical therapy, occupational therapy, speech therapy, and neurorehabilitation... are delivered in diverse settings such as hospitals, outpatient clinics, long-term care facilities, and patients' homes. These services often involve specialized diagnostic and therapeutic equipment, patient progress tracking systems, and tele-rehabilitation platforms. Each of these touchpoints collects and processes Protected Health Information (PHI) and sometimes biometric data, creating multiple security and privacy risks.

### 6.5.2.1 Challenges

Cyber threats can target rehabilitation facilities through ransomware, phishing, and attacks on connected therapy devices. Many therapy systems now include motion capture, neurostimulation, or robotic-assisted tools with internet connectivity for remote monitoring or software updates. If compromised, these systems could not only lead to data breaches but also disrupt therapy delivery or cause physical harm.

Mobile and home-based rehabilitation programs, while improving access, increase exposure to insecure networks and devices outside controlled clinical environments. The storage or transmission of therapy session data, particularly video or motion analysis files, over public internet connections without encryption creates significant vulnerability.

### 6.5.2.2 Recommendations

Rehabilitation facilities should **segment**<sup>515</sup> *clinical* systems from *administrative* networks and ensure all connected therapy equipment is on secure VLANs with restricted access. All therapy session data, whether stored locally or in the cloud, must be encrypted in transit and at rest.

For tele-rehabilitation services, platforms should use end-to-end encryption and strong authentication for both patients and clinicians. Vendor contracts for therapy devices and software should include requirements for regular patching, security testing, and incident reporting.

Staff should be trained in recognizing phishing attempts and securing devices during mobile or in-home sessions. Home-based rehabilitation kits provided to patients should come with pre-configured, secured devices and clear instructions for safe use. Continuous monitoring and periodic vulnerability scanning of connected therapy equipment will help ensure early detection of potential threats.

### 6.5.2.3 References

- **HIPAA Security**<sup>516</sup> and Privacy<sup>517</sup> Rules
- **GDPR** – Special Category<sup>518</sup> Data Protections
- **ISO/IEC 27001**<sup>519</sup> – Information Security Management Systems
- **NIST Cybersecurity Framework (CSF)**<sup>520</sup> – Healthcare Profiles
- **FDA Guidance on Cybersecurity for Networked Medical Devices**<sup>521</sup>

<sup>515</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>516</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>517</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>518</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>519</sup> <https://www.iso.org/standard/27001>

<sup>520</sup> <https://www.nist.gov/cyberframework>

<sup>521</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cybersecurity-networked-medical-devices-containing-shelf-ots-software>

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### 6.5.3 Long-Term Care & Elder Care

Long-term care and elder care facilities... including nursing homes, assisted living, hospice programs, and home-based elder care services... provide extended support to vulnerable populations, often with complex health needs. These facilities manage comprehensive health records, medication schedules, mobility and rehabilitation data, and sensitive personal information about residents. The industry is increasingly targeted by cybercriminals due to its combination of valuable data and historically limited cybersecurity maturity.

#### 6.5.3.1 Challenges

Common threats include ransomware attacks that disable care coordination systems, phishing campaigns targeting understaffed administrative teams, and breaches of electronic medication administration records (eMAR) or remote monitoring systems. Because residents in long-term care settings may rely on medical devices such as infusion pumps, oxygen concentrators, or remote vital sign monitors, vulnerabilities in these devices can have direct safety implications.

Many elder care environments also rely on third-party service providers for payroll, dietary management, pharmacy integration, and telehealth services. This interconnected ecosystem broadens the attack surface and introduces significant third-party risk. Privacy concerns are amplified by the intimate nature of data collected, which may include details about mental health, cognitive status, and family relationships... making breaches particularly harmful to residents and families.

#### 6.5.3.2 Recommendations

Long-term care facilities should enforce **role-based access control** for all clinical and administrative systems, using multi-factor authentication and automatic session timeouts. All patient data, including eMAR entries and remote monitoring results, should be encrypted at rest and in transit.

**Network segmentation**<sup>522</sup> is critical... *medical devices* and *monitoring systems* should be isolated from *administrative* networks, with **intrusion detection systems** monitoring for anomalous activity. **Vendor contracts** should require minimum cybersecurity standards, incident reporting obligations, and regular security audits.

**Staff training** should be tailored to the unique pace and environment of long-term care, focusing on phishing prevention, secure documentation, and safe device usage. Facilities should also maintain well-practiced downtime procedures to ensure continuity of care during IT outages. Finally, engagement with local and national healthcare threat intelligence networks can help facilities anticipate and mitigate emerging cyber threats targeting elder care services.

#### 6.5.3.3 References

- **HIPAA Privacy**<sup>523</sup> and **Security**<sup>524</sup> Rules
- **GDPR** – Special Category<sup>525</sup> Data Protections
- **NIST Cybersecurity Framework (CSF)**<sup>526</sup> – Healthcare Profiles
- **ISO/IEC 27001**<sup>527</sup> – Information Security Management Systems
- **CMS Long-Term Care Facility Requirements for Participation**<sup>528</sup>

<sup>522</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>523</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>524</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>525</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>526</sup> <https://www.nist.gov/cyberframework>

<sup>527</sup> <https://www.iso.org/standard/27001>

<sup>528</sup> <https://www.cms.gov/medicare/health-safety-standards/conditions-coverage-participation/long-term-care>

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## 6.5.4 Home Healthcare

Home healthcare delivers medical and supportive services directly to patients in their residences, including skilled nursing, physical therapy, wound care, medication administration, and chronic disease monitoring. This model greatly expands access and comfort for patients but also introduces a highly distributed and less controlled IT and physical environment. Clinicians use portable devices such as laptops, tablets, and smartphones to access EHR systems, manage care plans, and communicate with other providers... often over public or consumer-grade networks.

### 6.5.4.1 Challenges

Cybersecurity risks in home healthcare include device theft or loss, interception of unencrypted communications, and unauthorized access to patient records through compromised accounts. Remote patient monitoring (RPM) devices, such as glucose monitors, blood pressure cuffs, or pulse oximeters, can be vulnerable to tampering or data interception if not properly secured. Because these devices often transmit readings automatically to healthcare systems, compromised data could lead to incorrect clinical decisions.

Privacy concerns are heightened by the fact that care is delivered in a non-clinical environment. Family members, caregivers, or visitors could unintentionally gain access to confidential patient information if devices or records are not properly secured. Additionally, home healthcare agencies frequently partner with multiple vendors for scheduling, billing, and telehealth services... introducing third-party risks.

### 6.5.4.2 Recommendations

All portable devices used in home healthcare should be **encrypted**, equipped with **endpoint detection and response (EDR)** tools, and configured with **strong authentication measures**, including *multifactor authentication*. **Remote access to EHR** and scheduling systems should occur over **secure VPN connections** with session timeouts.

RPM devices must use secure, **encrypted** communication protocols and undergo **regular firmware updates**. Agencies should ensure that vendor contracts for telehealth or billing platforms include security standards, incident response requirements, and audit rights.

Clinicians should be **trained in secure data handling** outside the clinical setting... covering device storage, use of screen privacy filters, and ensuring PHI is not left visible in patient homes. **Incident response plans** should address scenarios unique to home healthcare, such as lost devices, compromised RPM systems, or patient-reported privacy breaches.

### 6.5.4.3 References

- **HIPAA Privacy**<sup>529</sup> and **Security**<sup>530</sup> Rules
- **GDPR** – Special Category<sup>531</sup> Data Protections
- **ISO/IEC 27001**<sup>532</sup> – Information Security Management Systems
- **NIST Cybersecurity Framework (CSF)**<sup>533</sup> – Healthcare Profiles
- **FDA Guidance on Cybersecurity for Medical Devices**<sup>534</sup>

<sup>529</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>530</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>531</sup> <https://gdpr-info.eu/art-9-gdpr/>

<sup>532</sup> <https://www.iso.org/standard/27001>

<sup>533</sup> <https://www.nist.gov/cyberframework>

<sup>534</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/cybersecurity-medical-devices-quality-system-considerations-and-content-premarket-submissions>

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## 6.6 Healthcare Industry Group-Specific Recommendations

There are some fundamental information security, privacy, and cyber resilience concepts which apply across most of the Healthcare Industry. The following sections describe 5 or 6 of these concepts which would provide a solid foundation for risk management within any organization operating within this industry.

### 6.6.1 Implement Zero-Trust Architectures Across All Care Settings

Hospitals, clinics, long-term care, and home healthcare providers should adopt **zero-trust principles**<sup>535</sup> to address the inherently high-risk nature of healthcare networks. This includes **segmenting**<sup>536</sup> *clinical, administrative, and guest* networks; enforcing **multi-factor authentication**; and applying **least-privilege access** across all roles and systems.

### 6.6.2 Strengthen Medical Device and IoT Security

Connected devices... from infusion pumps to telehealth peripherals... must be **inventoried**, **segmented**, and **monitored** with **intrusion detection systems** tuned for medical protocols. Vendor agreements should mandate **secure firmware updates**, vulnerability management, and post-market security support.

### 6.6.3 Enhance Data Governance and Privacy Controls

PHI, genomic data, and sensitive behavioral health records require strict governance. All healthcare entities should enforce **data minimization**<sup>537</sup>, **encrypt** data at rest and in transit, and implement **immutable audit logs**. Cross-organizational data sharing, particularly for public health and research, should be governed by formal agreements with aligned security and privacy standards.

### 6.6.4 Build Resilience Against Ransomware and Service Disruption

Given the industry's vulnerability to operational outages, all organizations should maintain tested **business continuity** and **disaster recovery plans** that integrate clinical downtime procedures. Regular tabletop exercises should simulate ransomware incidents and medical device compromise scenarios to validate readiness.

### 6.6.5 Integrate Cybersecurity into Clinical and Administrative Training

Frontline staff, including nurses, physicians, allied health professionals, and administrators, must be trained to recognize phishing, secure portable devices, and maintain cyber hygiene during high-stress scenarios. Security training should be incorporated into ongoing clinical competency programs.

### 6.6.6 Expand Threat Intelligence and Industry Collaboration

Active participation in healthcare-specific ISACs<sup>538</sup>, regional cyber defense coalitions, and government information-sharing programs enables early detection of targeted campaigns. Collaborative initiatives should also include coordinated vulnerability disclosure processes for medical devices and health IT systems.

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<sup>535</sup> [https://csrc.nist.gov/glossary/term/zero\\_trust\\_architecture](https://csrc.nist.gov/glossary/term/zero_trust_architecture)

<sup>536</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>537</sup> [https://en.wikipedia.org/wiki/Data\\_minimization](https://en.wikipedia.org/wiki/Data_minimization)

<sup>538</sup> <https://health-isac.org/>

## 7 Enabling Markets & Cross-Cutting Fields

The Enabling Markets & Cross-Cutting Fields that support the Healthcare sector... including Contract Research Organizations (CROs)<sup>539</sup>, Contract Development & Manufacturing Organizations (CDMOs<sup>540</sup>), Health Economics & Outcomes Research (HEOR), Medical Education & Training, Regulatory Affairs Consulting, Healthcare Investment & M&A, Ethics, Compliance, and Biosecurity... provide essential infrastructure, technologies, and expertise that drive innovation and operational efficiency across the industry.

These markets handle large volumes of sensitive data, including patient health information, research datasets, proprietary protocols, and regulatory submissions, making them attractive targets for cybercriminals, industrial espionage, and ransomware attacks.

Key information security and privacy challenges include safeguarding regulated health data under HIPAA, GDPR, and other global frameworks, ensuring secure integration across diverse healthcare systems, and protecting intellectual property and trade secrets critical to innovation.

Cyber resilience is further challenged by the reliance on interconnected platforms, third-party vendors, and complex supply chains, where disruptions, data breaches, or system compromises can cascade across the healthcare ecosystem, impacting patient care, research integrity, and organizational trust.

### 7.1 Contract Research Organizations (CROs)

Contract Research Organizations (CROs)<sup>541</sup> provide outsourced research services to pharmaceutical, biotech, and medical device companies, covering areas such as clinical trial management, data analysis, regulatory submission support, and laboratory testing. CROs operate at the heart of life sciences innovation, handling vast volumes of highly sensitive data... ranging from proprietary compound information to detailed patient records from multi-center trials.

#### 7.1.1 Challenges

This distributed operational model inherently increases the attack surface. CRO systems may be connected to multiple sponsor networks, clinical trial sites, laboratory information systems, and regulatory submission portals. Each integration point presents an opportunity for cyber intrusion, insider misuse, or data leakage. Further, CROs often manage global trials, which introduces compliance challenges across jurisdictions, including **HIPAA**, **GDPR**, **ICH GCP**, and local privacy laws in Asia-Pacific, the Middle East, and Latin America.

Given their critical role in product development timelines, CROs are high-value targets for **ransomware** and **nation-state espionage** aimed at intellectual property theft. A successful breach can delay clinical trials, compromise data integrity, and damage the reputations of both the CRO and its sponsors.

#### 7.1.2 Recommendations

CROs should adopt a **zero-trust architecture**<sup>542</sup> for sponsor-facing systems, enforcing strict identity verification, role-based access control, and encryption for all trial-related data. Integration with sponsor systems should occur via secure APIs or managed file transfer solutions with full audit trails.

Vendor risk management programs must extend to trial sites, labs, and subcontractors to ensure consistent application of security and privacy controls across the research chain. Regular penetration testing, red-team exercises, and independent audits should be performed to validate controls.

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<sup>539</sup> [https://en.wikipedia.org/wiki/Contract\\_research\\_organization](https://en.wikipedia.org/wiki/Contract_research_organization)

<sup>540</sup> [https://en.wikipedia.org/wiki/Contract\\_manufacturing\\_organization](https://en.wikipedia.org/wiki/Contract_manufacturing_organization)

<sup>541</sup> [https://en.wikipedia.org/wiki/Contract\\_research\\_organization](https://en.wikipedia.org/wiki/Contract_research_organization)

<sup>542</sup> [https://csrc.nist.gov/glossary/term/zero\\_trust\\_architecture](https://csrc.nist.gov/glossary/term/zero_trust_architecture)

Data governance frameworks should include clear policies for retention, archival, and secure disposal of sponsor and patient data. CROs should also participate in threat intelligence sharing networks specific to the clinical research community, enabling early detection of campaigns targeting trial infrastructure or data assets.

### 7.1.3 References

- **ICH E6 (R2)**<sup>543</sup> – Good Clinical Practice
- **ISO/IEC 27001**<sup>544</sup> – Information Security Management Systems
- **HIPAA Security**<sup>545</sup> and **Privacy**<sup>546</sup> Rules
- **GDPR – Cross-Border Data Transfer Rules**<sup>547</sup>
- **FDA Guidance on Electronic Records & Signatures (21 CFR Part 11)**<sup>548</sup>

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<sup>543</sup> [https://database.ich.org/sites/default/files/E6\\_R2\\_Addendum.pdf](https://database.ich.org/sites/default/files/E6_R2_Addendum.pdf)

<sup>544</sup> <https://www.iso.org/standard/27001>

<sup>545</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>546</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>547</sup> <https://gdpr-info.eu/chapter-5/>

<sup>548</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/part-11-electronic-records-electronic-signatures-scope-and-application>

## 7.2 Contract Development & Manufacturing Organizations (CDMOs)

Contract Development & Manufacturing Organizations (CDMOs<sup>549</sup>) provide end-to-end services for drug development and production, including process development, scale-up, manufacturing, packaging, and sometimes distribution. They handle sensitive intellectual property (IP), proprietary process parameters, and regulatory-critical batch records on behalf of multiple clients simultaneously. This multi-tenant operational environment presents complex **confidentiality** and **segmentation** challenges.

### 7.2.1 Challenges

Cyber threats include targeted industrial espionage to steal client manufacturing processes or formulations, ransomware attacks disrupting production schedules, and sabotage of manufacturing execution systems (MES) or quality control labs. Because CDMOs often manage high-value biologics, cell therapies, or advanced drug delivery systems, the loss or alteration of manufacturing data can have significant regulatory and financial impacts.

Third-party risk is a major factor. CDMOs frequently rely on subcontractors for raw materials, specialized testing, or packaging, creating extended supply chains with varying security postures. Compliance with **FDA**, **EMA**, **ICH Q7/Q10**, and **Good Manufacturing Practice (GMP)** standards must be maintained in parallel with robust information security controls.

### 7.2.2 Recommendations

CDMOs should implement **logical and physical segregation** of client data, systems, and production environments. Manufacturing OT networks must be isolated from corporate IT systems and protected with industrial intrusion detection systems (IDS) tuned for MES, SCADA, and PLC environments.

Strict access controls should enforce client-specific permissions for both internal staff and approved external partners. All client data and batch records must be encrypted in transit and at rest, with immutable logging to satisfy both security and regulatory audit requirements.

Third-party supplier and subcontractor security should be assessed regularly, with contractual obligations for **breach notification**, adherence to security standards, and audit rights. CDMOs should also perform regular red-team exercises simulating IP theft or process disruption, ensuring readiness to respond while minimizing operational downtime.

### 7.2.3 References

- **ICH Q7**<sup>550</sup> – Good Manufacturing Practice for Active Pharmaceutical Ingredients
- **ICH Q10**<sup>551</sup> – Pharmaceutical Quality System
- **ISO/IEC 27001**<sup>552</sup> – Information Security Management Systems
- **NIST Cybersecurity Framework (CSF)**<sup>553</sup>
- **FDA Data Integrity and Compliance Guidance**<sup>554</sup>

<sup>549</sup> [https://en.wikipedia.org/wiki/Contract\\_manufacturing\\_organization](https://en.wikipedia.org/wiki/Contract_manufacturing_organization)

<sup>550</sup> <https://database.ich.org/sites/default/files/Q7%20Guideline.pdf>

<sup>551</sup> <https://www.ema.europa.eu/en/ich-q10-pharmaceutical-quality-system-scientific-guideline>

<sup>552</sup> <https://www.iso.org/standard/27001>

<sup>553</sup> <https://www.nist.gov/cyberframework>

<sup>554</sup> <https://www.fda.gov/files/drugs/published/Data-Integrity-and-Compliance-With-Current-Good-Manufacturing-Practice-Guidance-for-Industry.pdf>

## 7.3 Health Economics & Outcomes Research (HEOR)

Health Economics & Outcomes Research (HEOR) evaluates the clinical, economic, and humanistic impact of healthcare interventions, guiding payer decisions, policy development, and market access strategies. HEOR work involves sensitive datasets, including de-identified patient health records, insurance claims, quality-of-life surveys, and sometimes identifiable demographic and socioeconomic information.

### 7.3.1 Challenges

While HEOR datasets are often de-identified, the richness and granularity of the data can enable **re-identification attacks**, particularly when linked with external datasets. These studies frequently integrate data from diverse sources such as EHRs, registries, and payer claims systems, each with different privacy safeguards and formats. Cyber risks include unauthorized access to HEOR databases, manipulation of cost-effectiveness models, or theft of proprietary economic modeling algorithms.

HEOR is increasingly conducted through collaborative consortia involving academic institutions, pharmaceutical companies, payers, and health technology assessment (HTA) bodies. This distributed model introduces third-party risk and raises challenges for enforcing uniform security controls. Because HEOR findings can influence reimbursement and formulary decisions worth billions, there is also potential for targeted data manipulation or insider threats aimed at skewing study outcomes.

### 7.3.2 Recommendations

HEOR teams should apply **privacy-preserving data analysis techniques**, including statistical disclosure control, differential privacy, and secure multi-party computation where feasible. All data transfers must use encrypted channels, and access to datasets should be governed by role-based permissions with detailed audit logging.

Collaborations should be formalized through agreements that specify security obligations, data use limitations, and **breach notification** timelines. Independent verification of modeling assumptions and results can help detect manipulation or bias before findings are published or submitted to HTA bodies.

HEOR systems should undergo regular penetration testing and vulnerability scanning, especially for web portals used by multiple stakeholders. Finally, HEOR organizations should participate in threat intelligence sharing with healthcare and research security communities to detect trends in targeting and improve collective defense against data breaches or model tampering.

### 7.3.3 References

- **ISPOR** Good Practices for Outcomes Research<sup>555</sup>
- **HIPAA** Privacy Rule<sup>556</sup> – De-Identification Standard
- **GDPR** – Data Protection Impact Assessments (DPIAs)<sup>557</sup> for Health Research
- **ISO/IEC 27001**<sup>558</sup> – Information Security Management Systems
- **NIST** Privacy Framework<sup>559</sup>

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<sup>555</sup> <https://www.ispor.org/heor-resources/good-practices>

<sup>556</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>557</sup> <https://gdpr.eu/data-protection-impact-assessment-template/>

<sup>558</sup> <https://www.iso.org/standard/27001>

<sup>559</sup> <https://www.nist.gov/privacy-framework>

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## 7.4 Medical Education & Training

Medical education and training programs deliver knowledge and skills to healthcare professionals, students, and specialists through academic institutions, professional societies, hospitals, and increasingly, online platforms. These programs may include sensitive datasets such as patient case studies, simulated health records, and research materials. When training uses real patient data... even in de-identified form... there is a risk of re-identification, especially when datasets are combined with other sources.

### 7.4.1 Challenges

Cyber risks extend to **Learning Management Systems (LMS)**, simulation platforms, and remote training environments. These systems can be targeted for credential theft, unauthorized access to exam materials, or disruption of course delivery. The shift toward virtual and hybrid medical education... especially during the COVID-19 pandemic... has increased reliance on video conferencing, cloud-hosted materials, and remote assessment tools, each with its own security vulnerabilities.

In addition to cybersecurity, **intellectual property protection** is a concern. Course content, specialized simulation software, and proprietary research methodologies can be stolen or pirated, undermining program value and competitiveness. Institutions that collaborate internationally face added risks from varying data protection laws and differing attitudes toward security controls in educational contexts.

### 7.4.2 Recommendations

Medical education programs should enforce **multi-factor authentication** for all LMS access and encrypt both stored and transmitted course content. Virtual training environments should be hosted on secure, monitored platforms with logging and anomaly detection.

Institutions should apply **privacy-by-design**<sup>560</sup> to case-based learning, ensuring all patient data is fully anonymized and stripped of indirect identifiers before use. IP protection strategies, such as **watermarking**<sup>561</sup> and access restrictions, can help safeguard course materials and proprietary research.

Vendor risk management is essential, particularly for third-party LMS providers and simulation software developers. Contracts should specify minimum security requirements, **breach notification** timelines, and ongoing patching obligations. Regular security awareness training for educators and students will help mitigate social engineering risks and improve resilience against phishing and credential theft.

### 7.4.3 References

- **FERPA** – Family Educational Rights and Privacy Act (U.S.)<sup>562</sup>
- **GDPR UK** – Education Data Provisions<sup>563</sup>
- **ISO/IEC 27001**<sup>564</sup> – Information Security Management Systems
- **NIST Cybersecurity Framework (CSF)**<sup>565</sup> – Education Industry Adaptations
- **AMEE** – International Standards<sup>566</sup> in Medical Education

<sup>560</sup> [https://en.wikipedia.org/wiki/Privacy\\_by\\_design](https://en.wikipedia.org/wiki/Privacy_by_design)

<sup>561</sup> [https://en.wikipedia.org/wiki/Digital\\_watermarking](https://en.wikipedia.org/wiki/Digital_watermarking)

<sup>562</sup> <https://studentprivacy.ed.gov/faq/what-ferpa>

<sup>563</sup> <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/right-of-access/education-data/>

<sup>564</sup> <https://www.iso.org/standard/27001>

<sup>565</sup> <https://www.nist.gov/cyberframework>

<sup>566</sup> <https://amee.org/amee-guides/>

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## 7.5 Regulatory Affairs Consulting

Regulatory Affairs (RA) consulting firms help life sciences companies navigate complex, region-specific regulatory requirements for drug, biologic, medical device, and combination product development. This includes preparing and managing submissions to agencies like the **FDA**, **EMA**, **PMDA**, and **TGA**, as well as supporting post-market compliance and product lifecycle management. These firms handle highly confidential intellectual property, proprietary clinical and manufacturing data, and regulatory correspondence... making them prime targets for both cyber-espionage and financially motivated attacks.

### 7.5.1 Challenges

The distributed nature of RA work creates risks. Consulting teams often collaborate across multiple clients, therapeutic areas, and geographies, using shared document management platforms and secure portals to manage submissions and regulatory responses. Weaknesses in access control, document versioning, or encryption can result in unauthorized disclosure of critical data. Given that RA timelines can be business-critical... such as during accelerated approval processes... a cyber incident can directly delay product launches and damage a client's competitive position.

**Cross-border** work introduces additional compliance challenges, as RA consultants must align with varying privacy, data residency, and export control regulations. Working with smaller biotech clients or international partners with less mature security postures increases third-party risk. The trend toward **electronic submissions (eCTD)** and digital regulatory interactions also makes the integrity and authenticity of digital records a core security concern.

### 7.5.2 Recommendations

RA consulting firms should implement **secure document management systems** with encryption in transit and at rest, granular role-based permissions, and immutable audit trails. Multi-factor authentication should be mandatory for all client data access, with IP allowlisting for sensitive submission portals.

Data loss prevention (DLP) technologies can help monitor and control the movement of regulated documents, while digital signature solutions can safeguard submission authenticity. Cross-client **segmentation**... both logically and physically... is critical to prevent data leakage between accounts.

Vendor risk management should extend to translation services, contract writers, and technical publishers who may handle submission materials. Regular cybersecurity training for consultants should emphasize secure handling of regulated documents, phishing prevention, and secure communication practices with regulatory bodies.

### 7.5.3 References

- **FDA 21 CFR Part 11**<sup>567</sup> – Electronic Records; Electronic Signatures
- **EMA eSubmission Roadmap**<sup>568</sup> – Electronic Common Technical Document (eCTD)
- **ISO/IEC 27001**<sup>569</sup> – Information Security Management Systems
- **ICH Guidelines** – Common Technical Document (CTD) Standards<sup>570</sup>
- **NIST Cybersecurity Framework (CSF)**<sup>571</sup>

<sup>567</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/part-11-electronic-records-electronic-signatures-scope-and-application>

<sup>568</sup> <https://esubmission.ema.europa.eu/ectd/>

<sup>569</sup> <https://www.iso.org/standard/27001>

<sup>570</sup> [https://www.ema.europa.eu/en/documents/scientific-guideline/ich-guideline-m4-r4-common-technical-document-ctd-registration-pharmaceuticals-human-use-organisation-ctd-step-5\\_en.pdf](https://www.ema.europa.eu/en/documents/scientific-guideline/ich-guideline-m4-r4-common-technical-document-ctd-registration-pharmaceuticals-human-use-organisation-ctd-step-5_en.pdf)

<sup>571</sup> <https://www.nist.gov/cyberframework>

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## 7.6 Healthcare Investment and M&A

Healthcare investment and mergers & acquisitions (M&A) activity involves extensive due diligence, deal structuring, and post-acquisition integration, often across borders. Investors, private equity (PE) firms, and strategic buyers in this space gain access to vast amounts of sensitive data during the evaluation process, including financial performance records, patient demographics, payer contracts, compliance histories, and proprietary clinical or research IP.

### 7.6.1 Challenges

The due diligence phase is a prime target for cyberattacks, particularly **data room breaches** where confidential deal documents are stored and shared. Adversaries may also target communications between advisors, legal counsel, and executive teams to gain insider information or manipulate transactions. **Cross-border** healthcare M&A adds complexity through varying privacy laws, antitrust regulations, and healthcare-specific compliance obligations (e.g., HIPAA in the U.S., GDPR in the EU, and region-specific health data localization laws).

Post-acquisition integration creates another layer of risk, as IT environments, EHR systems, and vendor contracts from separate entities are merged. Without thorough security assessments, vulnerabilities from one organization can spread into the entire combined enterprise. The compressed timelines typical of M&A deals often mean cybersecurity due diligence is rushed, creating gaps that may be exploited after closing.

### 7.6.2 Recommendations

Healthcare investment and M&A transactions should include **comprehensive cybersecurity due diligence**, covering IT infrastructure, compliance status, historical breaches, vendor dependencies, and operational resilience. Data rooms must be hosted on secure, access-controlled platforms with **encryption, watermarking**<sup>572</sup>, and activity logging.

During integration, a phased approach should be used for connecting networks and systems, with vulnerability scans, penetration testing, and asset inventory reconciliation before merging environments. Any inherited vulnerabilities must be remediated as part of the integration plan.

Investor and advisor teams should be trained in secure communications practices, and all third-party advisors (legal, financial, technical) must meet defined security requirements. Where sensitive health data is involved, ensure that legal teams evaluate applicable data localization laws and consent obligations before transfers occur.

### 7.6.3 References

- **HIPAA Privacy**<sup>573</sup> and **Security**<sup>574</sup> Rules
- **GDPR – Cross-Border Data Transfer**<sup>575</sup> and M&A Implications
- **ISO/IEC 27001**<sup>576</sup> – Information Security Management Systems
- **NIST Cybersecurity Framework (CSF)**<sup>577</sup>
- **ABA Cybersecurity Legal Task Force**<sup>578</sup> – M&A Cybersecurity Guidance

<sup>572</sup> [https://en.wikipedia.org/wiki/Digital\\_watermarking](https://en.wikipedia.org/wiki/Digital_watermarking)

<sup>573</sup> <https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

<sup>574</sup> <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

<sup>575</sup> <https://gdpr-info.eu/chapter-5/>

<sup>576</sup> <https://www.iso.org/standard/27001>

<sup>577</sup> <https://www.nist.gov/cyberframework>

<sup>578</sup> <https://www.americanbar.org/groups/cybersecurity/>

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## 7.7 Ethics, Compliance, and Biosecurity

Ethics, compliance, and biosecurity are cross-cutting imperatives in the life sciences, biomedical, pharmaceutical, and healthcare industries. Ethical oversight ensures that research and development activities are conducted with integrity, respect for participants, and in alignment with global norms such as the **Declaration of Helsinki**. Compliance encompasses adherence to laws, regulations, and standards ranging from clinical trial protocols and manufacturing practices to privacy laws like **HIPAA** and **GDPR**. Biosecurity focuses on preventing the misuse of biological materials, knowledge, and technologies... whether through accidental release, insider threat, or deliberate bioterrorism.

### 7.7.1 Challenges

Key risks in this space include breaches of research ethics (e.g., inadequate informed consent, misuse of genomic data), regulatory non-compliance leading to sanctions or loss of licensure, and lapses in biosafety/biosecurity protocols that could endanger public health. Emerging biotechnologies... such as CRISPR gene editing, synthetic biology, and gain-of-function research... intensify these challenges by creating novel ethical dilemmas and dual-use risks.

Globalization of research and production compounds the problem, as projects often span jurisdictions with differing ethical standards, regulatory requirements, and biosecurity enforcement capabilities. The absence of harmonized oversight mechanisms creates vulnerabilities in multi-country collaborations, especially in regions with less mature governance frameworks.

### 7.7.2 Recommendations

Organizations should establish **integrated governance structures** that combine ethics review boards, compliance offices, and biosecurity committees. These bodies should work in concert to evaluate new projects, monitor ongoing operations, and respond to incidents.

Ethics oversight must ensure transparent, informed consent processes, especially for research involving genetic data or vulnerable populations. Compliance programs should include regular internal audits, regulatory horizon scanning, and training for staff on evolving laws and standards. Biosecurity measures should cover physical facility security, access control to pathogens and sensitive data, personnel reliability programs, and secure handling of dual-use research outputs.

International collaborations should adopt the **highest common denominator** approach... aligning all participants with the strictest applicable ethical, regulatory, and biosecurity standards. Participation in international forums, biosecurity networks, and information-sharing platforms will help organizations anticipate and adapt to emerging risks.

### 7.7.3 References

- **FDA 21 CFR Part 11**<sup>579</sup> – Electronic Records; Electronic Signatures
- **EMA eSubmission Roadmap** – Electronic Common Technical Document (eCTD)<sup>580</sup>
- **ISO/IEC 27001**<sup>581</sup> – Information Security Management Systems
- **ICH Guidelines** – Common Technical Document (CTD) Standards<sup>582</sup>

<sup>579</sup> <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/part-11-electronic-records-electronic-signatures-scope-and-application>

<sup>580</sup> <https://esubmission.ema.europa.eu/ectd/>

<sup>581</sup> <https://www.iso.org/standard/27001>

<sup>582</sup> [https://database.ich.org/sites/default/files/M4Q\\_R1\\_Guideline.pdf](https://database.ich.org/sites/default/files/M4Q_R1_Guideline.pdf)

- NIST Cybersecurity Framework (CSF)<sup>583</sup>

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<sup>583</sup> <https://www.nist.gov/cyberframework>



## 7.8 Industry-Specific Recommendations

There are some fundamental information security, privacy, and cyber resilience concepts which apply across most of these cross-cutting fields supporting the broad Healthcare sector. The following sections describe 5 or 6 of these concepts which would provide a solid foundation for risk management within any organization operating within these fields.

### 7.8.1 Enforce Zero-Trust and Segmentation for Multi-Client Environments

CROs, CDMOs<sup>584</sup>, and consulting firms must maintain strict **logical and physical segregation** between client data, networks<sup>585</sup>, and systems. Multi-tenant platforms should apply role-based access control, multi-factor authentication, and encryption for all sensitive data in transit and at rest.

### 7.8.2 Strengthen Third-Party Risk Management and Contractual Controls

Because these organizations depend heavily on subcontractors, vendors, and external partners, supplier due diligence should include cybersecurity maturity assessments, **breach notification** SLAs, and regular audits. Contracts must explicitly state security obligations, including secure data handling, storage, and destruction.

### 7.8.3 Protect Intellectual Property and Proprietary Processes

Healthcare manufacturing partners, HEOR<sup>586</sup> teams, and RA consultants handle valuable IP and proprietary methodologies. Protections should include **secure document management** systems, **DLP controls**, **watermarking**<sup>587</sup>, and **digital rights management**<sup>588</sup> for critical materials. Red-team exercises should simulate IP theft scenarios to test response readiness.

### 7.8.4 Implement Privacy-by-Design and Advanced Data Protection for Research

HEOR and medical education programs must safeguard sensitive health and demographic data against re-identification attacks. Adoption of **privacy-enhancing technologies**... such as differential privacy, secure multi-party computation, and federated learning... can enable collaborative analysis without compromising privacy.

### 7.8.5 Harden Digital Platforms for Education, Regulatory Work, and Transactions

LMS, regulatory submission systems, and M&A data rooms should be hosted on secure, access-controlled platforms with encryption, immutable audit trails, and detailed activity logging. MFA should be mandatory for all users, and systems should undergo periodic penetration testing.

### 7.8.6 Integrate Ethics, Compliance, and Biosecurity into Governance

Cross-cutting ethics, compliance, and biosecurity programs should be formalized to oversee high-risk research, global collaborations, and emerging biotechnologies. Governance frameworks must align with the strictest applicable standards across all jurisdictions and include continuous training, monitoring, and incident response capabilities.

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<sup>584</sup> [https://en.wikipedia.org/wiki/Contract\\_manufacturing\\_organization](https://en.wikipedia.org/wiki/Contract_manufacturing_organization)

<sup>585</sup> [https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation\\_infographic\\_508\\_0.pdf](https://www.cisa.gov/sites/default/files/2023-01/layering-network-security-segmentation_infographic_508_0.pdf)

<sup>586</sup> <https://www.ispor.org/heor-explained>

<sup>587</sup> [https://en.wikipedia.org/wiki/Digital\\_watermarking](https://en.wikipedia.org/wiki/Digital_watermarking)

<sup>588</sup> [https://en.wikipedia.org/wiki/Digital\\_rights\\_management](https://en.wikipedia.org/wiki/Digital_rights_management)

## 8 Conclusion

Players all across the overall healthcare market sector (including *life sciences*, *biomedical research*, *pharmaceutical*, *healthcare*, and *enabling markets*) are bound together by shared reliance on sensitive data, high-value intellectual property, complex global supply chains, and the mandate to protect patient safety and trust.

Across all domains examined in this whitepaper, it is clear that **cybersecurity**, **privacy**, and **operational resilience** are no longer discrete considerations... they are strategic imperatives central to organizational viability and public health outcomes.

The interconnected nature of modern health innovation means that vulnerabilities in one industry can cascade into others. A breach in a CRO can compromise clinical trial integrity; a ransomware attack on a hospital can delay critical treatments; supply chain disruptions in pharmaceutical manufacturing can affect patient access worldwide. As such, **risk must be managed holistically**, with organizations treating themselves not as isolated entities, but as integral nodes in a global, interdependent health ecosystem.

Several cross-industry themes emerged consistently:

- **Zero-Trust Architectures**<sup>589</sup> are necessary to address complex multi-tenant environments and hybrid IT/OT systems.
- **Third-Party Risk Management**<sup>590</sup> is essential, given the heavy reliance on vendors, contractors, and collaborative partners.
- **Privacy-by-Design**<sup>591</sup> and **Data Minimization**<sup>592</sup> must be built into systems from the ground up, especially for research and analytics involving PHI or genomic data.
- **Operational Continuity Planning** is critical to mitigate ransomware, supply chain disruption, and geopolitical risk.
- **Ethics, Compliance, and Biosecurity** require unified **governance** to keep pace with emerging technologies and evolving threats.

In moving forward, leaders in these industries must embed security and privacy into every process, system, and strategic decision. Investment in workforce training, incident response readiness, and information-sharing partnerships will be key to ensuring that innovation can proceed without compromising safety or public trust. By adopting the industry-specific and cross-industry recommendations outlined in this whitepaper, organizations will not only strengthen their own resilience but also contribute to the stability and integrity of the global health ecosystem.

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<sup>589</sup> [https://csrc.nist.gov/glossary/term/zero\\_trust\\_architecture](https://csrc.nist.gov/glossary/term/zero_trust_architecture)

<sup>590</sup> <https://www.gartner.com/en/legal-compliance/topics/third-party-risk-management-tpm>

<sup>591</sup> [https://en.wikipedia.org/wiki/Privacy\\_by\\_design](https://en.wikipedia.org/wiki/Privacy_by_design)

<sup>592</sup> [https://en.wikipedia.org/wiki/Data\\_minimization](https://en.wikipedia.org/wiki/Data_minimization)

## A. APT Groups Targeting the Healthcare Sector

APT Group	Origin	Primary Targets
<b>APT10 (Red Apollo)</b>	China	Pharma, MSP clients, vaccine manufacturers
<b>APT41 (Double Dragon)</b>	China	Healthcare, tech, telecom, video game industries
<b>APT22 (Barista / Suckfly)</b>	China	Biomedical, pharmaceutical firms
<b>APT18</b>	China	Healthcare and medical data (via FireEye insights)
<b>APT28 (Fancy Bear)</b>	Russia	COVID-19 vaccine targets, drug testing / doping institutions
<b>APT29 (Cozy Bear)</b>	Russia	Vaccine developers, medical research
<b>Lazarus Group (North Korea)</b>	North Korea	COVID-19 R&D and pharmaceutical sectors
<b>Generic Russian APTs</b>	Russia	Healthcare through ransomware and data extortion strategies
<b>Vice Society (ransomware)</b>	Russia-linked	Hospitals and regional health systems

### Motivations for Targeting the Healthcare Sector

- **Strategic advantage & national goals:** Many of these groups aim to extract R&D data to bolster domestic innovation (e.g., China's biomedical ambitions).
- **Commercial espionage:** Stealing clinical trial designs, patents, IP, and schematics can boost economic or scientific edge.
- **Grave societal impact:** Disrupting healthcare or research not only yields valuable data but can cause widespread harm, amplifying coercive leverage.

### 8.1 APT10 (Red Apollo / Stone Panda) – China

- Known for **Operation Cloud Hopper**, APT10 compromised Managed Service Providers (MSPs) to access clients across industries—including **pharmaceuticals**, engineering, telecom, and manufacturing.
- In **March 2021**, they specifically targeted **Bharat Biotech** and the **Serum Institute of India**—two vaccine powerhouses—to steal intellectual property.

### 8.2 APT41 (Double Dragon / Winnti group) – China

- A dual-purpose group engaged in both espionage and financially motivated crime. They've targeted sectors including **healthcare**, telecoms, and tech.
- Their campaigns align with China's strategic goals under initiatives like **"Made in China 2025"**, which emphasize high-tech and biomedical self-sufficiency.

### 8.3 APT22 (Barista / Suckfly) – China

- Specifically focused on targeting the healthcare sector, notably biomedical and pharmaceutical firms.

- Techniques include identifying vulnerable public-facing servers to inject web shells, and deploying sophisticated malware such as **PISCES**, **FLATNOTE**, **SEAWOLF**, and **LOGJAM**.

#### 8.4 APT41, APT22, APT10, APT18 – Chinese-Linked Networks

- According to FireEye, multiple Chinese-linked APTs—including **APT41**, **APT22**, **APT10**, and **APT18**—have been caught trying to exfiltrate **medical data**, including **clinical trial information**, **IP**, and **medical device schematics**.

#### 8.5 APT28 (Fancy Bear / Strontium) – Russia

- A notorious Russian espionage group; Microsoft has linked them to attempts to access **COVID-19 vaccine research**.
- They've also targeted **doping and drug testing data**, such as in hacks against the IAAF and related sports bodies.

#### 8.6 APT29 (Cozy Bear) – Russia

- Microsoft and other authorities reported Cozy Bear's attempts to breach **COVID-19 research organizations**, including pharmaceutical companies and clinical research entities.

#### 8.7 Lazarus Group (Zinc, Cerium) – North Korea

- In the course of the pandemic, they targeted **vaccine development companies** in Canada, France, India, South Korea, and the U.S.

#### 8.8 Other Notable Actors

- **Russia-linked ransomware/espionage groups** have targeted healthcare through tactics like triple extortion, spear phishing, and exploiting unpatched systems, with ransom demands ranging from **\$400K to \$3M**.
- **Vice Society**, a ransomware gang, has attacked **hospitals and regional healthcare centers**, using double extortion tactics.

## B. HITRUST Assessment Levels & Control Counts

### e1 (Essentials, 1-Year Validated Assessment)

- Designed for organizations with foundational cybersecurity hygiene.
- Includes **44 standardized, foundational security controls**.

### i1 (Implemented, 1-Year Validated Assessment)

- Offers **moderate assurance** and builds upon e1.
- Typically comprises **187 controls**, which include the 44 from e1.
- Note: some sources reference up to **219 controls**, though the latest version (CSF v11) specifies **182 controls**—suggesting some updates over time.

### r2 (Risk-Based, 2-Year Validated Assessment)

- The most comprehensive, customizable assessment aligned to organizational risk levels.
- Based on customization, there are **over 2,000 possible controls**, with the **average assessment covering around 385 controls**.

HITRUST Level	Assurance Level	Number of Controls
<b>e1</b>	Foundational	<b>44</b> standardized controls
<b>i1</b>	Moderate	<b>~187</b> controls (includes e1's 44; varies)
<b>r2</b>	Highest/Risk-Based	Customized; typically <b>~385</b> controls, up to <b>2,000+ possible</b>

## C. Example Security Controls Matrix for the Broader Healthcare Market Sector

A typical, comprehensive Information Security & Privacy Program will (minimally) address the following key controls and control concepts, with strategic support from the executive/board level of the business. These controls are organized here by:

- Control Objective: Preventative, Detective, and Corrective
- Control Type: Administrative, Physical and Technical

Control Type \ Objective	Prevent	Detect	Correct
<b>Administrative Controls</b> (Policies, Procedures, Governance)	Sector-wide ISMS & PIMS <b>policies</b> (ISO 27001/27701)	Periodic compliance <b>audits</b> (HIPAA, GxP, GMP)	Policy updates & <b>retraining</b>
	Regulatory compliance <b>frameworks</b> (HIPAA, GDPR, FDA, EMA)	Internal/external security <b>assessments</b>	Disciplinary <b>actions</b>
	Vendor and supply chain <b>due diligence</b> (CROs, CDMOs, insurers, tech providers)	Review of access entitlements, segregation of duties, and incident <b>reports</b>	Regulator and patient <b>notifications</b>
	Workforce privacy/security <b>training</b> (pharma reps, clinicians, researchers)	Continuous privacy <b>impact assessments</b> (PIAs/DPIAs)	Vendor contract <b>enforcement/remediation</b>
	Access control <b>policies</b> (least privilege, RBAC)		<b>Lessons learned</b> integrated into governance processes
<b>Physical Controls</b> (Protecting IoT Hardware & Environment)	<b>Restricted access</b> to labs, hospitals, data centers, and pharma manufacturing sites	CCTV, badge access monitoring in clinical facilities, research labs, and supply chain logistics hubs	<b>Lockdown</b> of compromised facilities
	<b>Environmental controls</b> (clean rooms, temperature monitoring, IoT sensors for biotech and pharma)	Environmental anomaly detection (HVAC failure, power outages)	<b>Revocation</b> of physical access credentials
	<b>Secure destruction</b> of physical media (patient charts, research records, prototypes)	Inventory checks on medical devices and IoMT assets	<b>Secure wipe/replacement</b> of contaminated lab or clinical equipment

			Reissuance of device/asset tracking credentials
<b>Technical Controls</b>  (Security Mechanisms within IoT Systems)	<b>Encryption</b> of PHI/PII at rest & in transit (EHR, genomics data, drug trial records)	<b>SIEM monitoring</b> of EHR, pharma R&D, CRO/CDMO environments	<b>Incident response &amp; forensic analysis</b> playbooks
	<b>Multi-factor authentication &amp; PAM</b> for clinicians, researchers, and supply chain staff	<b>Endpoint/EDR monitoring</b> of clinical devices and manufacturing control systems	<b>Immutable and tested backups</b> (critical for ransomware resilience in hospitals and pharma)
	<b>Secure SDLC</b> and <b>code review</b> for healthcare SaaS, biotech platforms, and pharma manufacturing automation	<b>Behavioral anomaly detection</b> for insider threats and bad actor abuse	<b>Patch management</b> and hotfix rollout across IoMT/IloT ecosystems
	<b>DLP controls</b> for clinical trial and research data	<b>DLP alerts</b> for clinical data exfiltration	Customer/patient/regulator <b>breach notification workflows</b>
	<b>Network segmentation</b> between IT, OT, and IoMT systems		<b>Secure rollback</b> of compromised SaaS or biotech platforms