



BULLETIN

INFORMATION SECURITY AND BUSINESS RESILIENCY SUPPLEMENT

This Bulletin is issued in accordance with the section of the Fannie Mae Information Security and Business Resiliency Supplement (the “**Supplement**”) entitled *General Requirements, Issued Bulletins; Amendments*. The purpose of this Bulletin is to notify Companies subject to the Supplement that a new version of the Supplement has been published.

In addition to minor clerical and clean-up edits, including typo corrections, renumbering of sections, reformatting and other similar modifications, the updated Supplement includes the following substantive changes:

SECTION/ TITLE	DESCRIPTION OF CHANGE
1 - Introduction	New component of Super Intelligence ¹ governance added to the Supplement
2 – Relevant Terms	Added the term and corresponding definition of: Super Intelligence and Losses
	Updated the definitions for the following terms: Data Back-up (formerly Back-up), Company, Confidential Information, Cybersecurity Incident, Fannie Mae Confidential Information, and Underlying Agreements
3 – Information Security Program	Added NIST Framework 800-53 as an example industry standard for Company program alignment
	Added an insurance policy requirement
	Removed reference to SF Lender providing attestation through annual Form 582
3.1 – Access Management	Updated implementation requirements for MFA
3.2 – Human Resources Security	Updated code of conduct requirements to reference protection of Confidential Information, generally
3.3 – Audit and Accountability	Changed independent security assessment requirement from a “qualified independent auditor” to an “independent third-party security professional”
	Clarified Company requirement to commission an independent security assessment

¹ The term “Super Intelligence” is used in place of “Artificial Intelligence” to align with evolving industry terminology. This terminology update is not intended to alter the scope, meaning, or applicability of the requirements.

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3.5 – Physical and Environmental Controls	Removed requirement that Company maintain environmental controls in favor of similar requirements in the Supplement
3.6 – Cybersecurity Incident Management and Response	Clarified that notice to Fannie Mae of any disruptions, including those related to technology, must be “prompt”
3.10 – Data Protection and System Security	Updated encryption requirements with industry standards alignment
	Revised to clarify limitations on access to Confidential Information
3.14 – Supply Chain Risk Management	Replaced the term “vendor” with the term “third party” (throughout Supplement)
	Updated Company requirements for responsibility of third party compliance with Supplement
4 – Super Intelligence (SI) (NEW)	Added new section on SI governance requirements for Companies that use SI in connection with the activities performed under, or relating, to its Underlying Agreements, to include: an SI Governance Program, supply chain management, disclosure requirements to Fannie Mae
5 – Cybersecurity Incident Management (formerly Section 4)	Revised requirements for initial notification to Fannie Mae within 36-hour period followed by “prompt” notification of supplemental details
5.1 – Actions by Fannie Mae (formerly Section 4.1)	Clarified that access may be restored at Fannie Mae’s sole discretion
5.3 – Additional Company Requirements (formerly Section 4.3)	Expanded Cybersecurity Incident reporting to include all data attributes of impacted individuals and the provision of the notification letter sent by Company to impacted individuals with a copy to Fannie Mae
6.1 – Business Continuity Plan (formerly Section 5.1)	Updated requirement that Company’s Business Continuity Plan ensure the ability to recover from disruption of Company relationship with a third party that is material to business conducted with Fannie Mae per the Underlying Agreement
	Replaced threat assessment and continuity plan requirement with business impact analysis
	Added requirement Company’s Business Continuity Plan include communication strategy around incident response (removing previous requirement specific to crisis management plan)
6.2 – Additional Requirements	Removed requirement for Company to conduct an annual threat risk assessment
	Removed requirement the Business Continuity Plan is formally

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	socialized with Company leadership
	Removed requirement for Company to establish contingencies for fourth party vendors
	Removed requirement for Company to recover business operations for issues with third party vendors in favor of similar requirements in the Supplement
	Replaced technology continuity planning with disaster recovery planning and clarified annual testing requirements
	Removed requirements to share with management and track to resolution lessons learned and after actions
7 – General Requirements; Issued Bulletins; Amendments	Updated to clarify that Company is deemed to accept amendments if no rejection within applicable period

All changes described above are effective as of the Effective Date indicated in this Bulletin, in accordance with the Section of the Supplement entitled *General Requirements, Issued Bulletins; Amendments*. All other terms and conditions of the Supplement shall continue in full force and effect. If there is any inconsistency between or among the provisions contained in the Supplement and this Bulletin, the Supplement will govern.