

# Automate Assurance with Security & Financial Controls using Semantic AI



# Panelists



Mariano Smurra

Sr Director, Global Internal  
Control

Iron Mountain



Joel Malchuk

Director, IT Business  
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Warby Parker



Derek Sample

CAO / VP Digital  
Transformation

Six Flags Entertainment



Jim Cowart

Director, Governance, Risk  
& Compliance

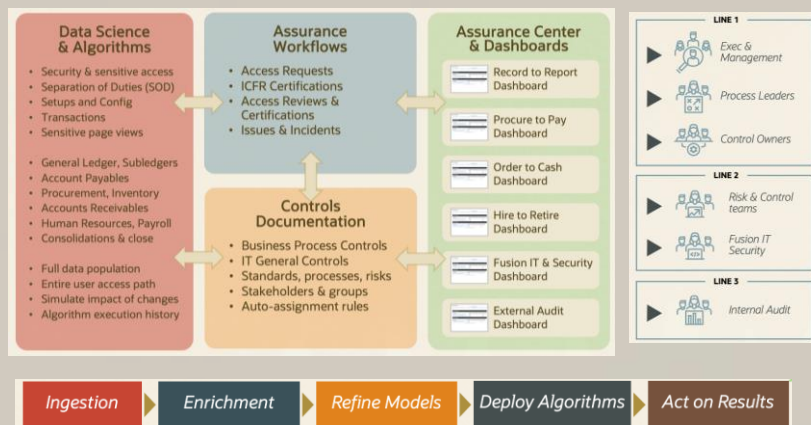
Grant Thornton





# Solutions and Use Cases

## Enterprise-wide Assurance



Engage process owners (Line 1) with daily & continuous assurance

One unified system for documentation & data analysis across stakeholders

Automate ICFR including Cybersecurity and SOD with 100% transaction monitoring

## Solution Areas

**Prevent SOD violations**

1. Design Custom Roles without SOD violations
2. Check Access Requests for SOD violations [video](#)

**Monitor User Access**

3. Monitor & Report Sensitive (Restricted) Access [video](#)
4. Monitor & Report Separation of Duties (SOD) [video](#)
5. Automate User Access Reviews & Certifications [video](#)

**Monitor User Activity**

### Monitor Critical Configurations & Transactions:

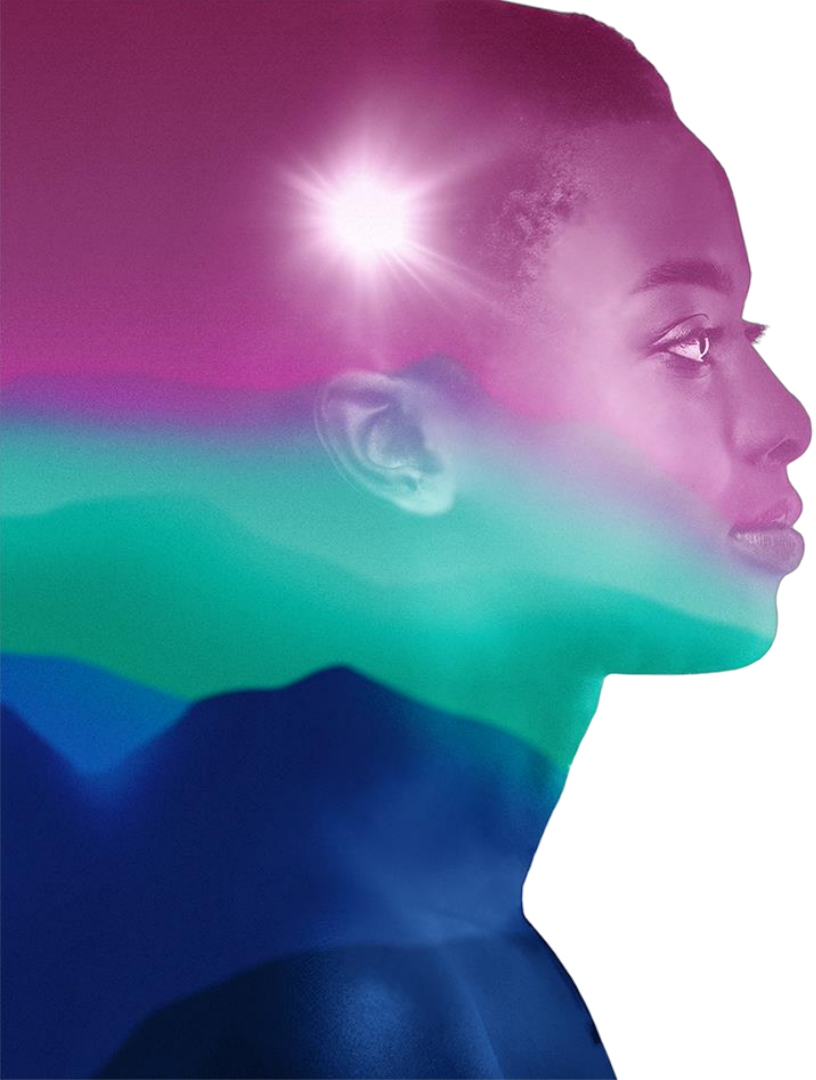
6. IT Superuser Assurance [video](#)
7. Procure to Pay Assurance [video](#)
8. Record to Report Assurance
9. Order to Cash Assurance
10. Hire to Retire Assurance [video](#)

**Manage Internal Controls**

11. Document (RCM), Test & Certify Controls

Videos: [www.riskcloud.wiki](http://www.riskcloud.wiki)





# ***Iron Mountain (IRM)***

**Mariano Smurra**  
**Global Internal Controls - Senior Director**

September 2024

Elevate the power of **your work.**™





# IRON MOUNTAIN **SNAPSHOT** (NYSE: IRM)

Mountaineers  
**~27,000**

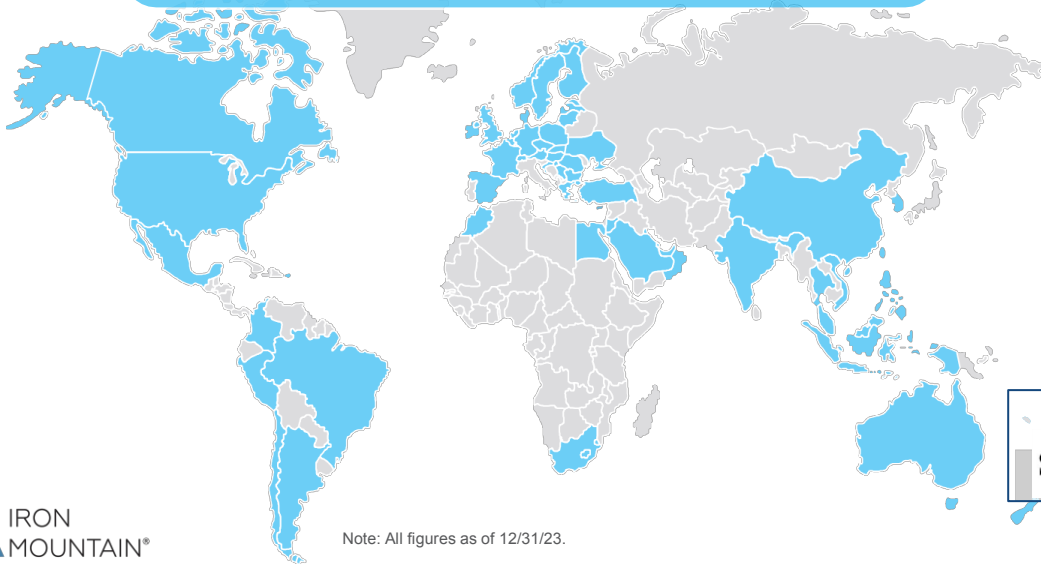
Customers Served  
**240,000+**

Countries Served  
**60**

Facilities  
**~1,400**

## Global Presence

**~98M Sq. Ft. | ~731.5M Cubic Ft. Global Physical Volume**



Note: All figures as of 12/31/23.

## 2023 Revenue Breakdown



Member of

S&P 500

**Nareit**



# OVERVIEW OF OUR **BUSINESS UNITS**



## Global RIM<sup>1</sup>

Comprehensive information management offerings spanning physical storage, digital solutions, and digital storage

## Data Center

Data Center facilities for enterprise and hyperscale clients to protect mission-critical assets and ensure continued operation of IT infrastructure

## Asset Lifecycle Management (ALM)

IT asset management solutions through entire asset lifecycle while protecting data, optimizing use, maximizing return on investment, and minimizing environmental impact

## Crozier Fine Arts

Technical expertise in handling, installation, and storing of art to provide customers sustainable solutions



# Executive Summary

Oracle Cloud  
implementation  
Jan 2022 - YTD

PwC assessments  
over role design  
Aug 2022

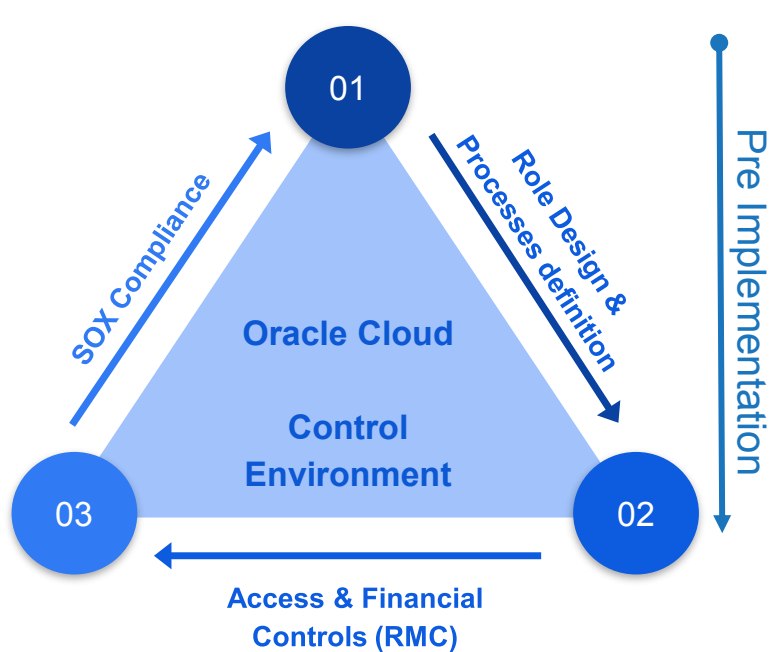
RMC implemented  
by PwC  
Feb - Apr 2023

Significant  
Deficiency  
Nov 2022





# Lesson Learned & Results



## Other considerations:

- Risk Assessment
- RMC Governance (IT & IA teams)
- Mitigating Controls



**Significant  
Deficiency  
Remediated**



**Continuous  
Monitoring &  
Reporting**



**USD 500k saving  
on duplicate  
payments**



**Delegation of  
Authority  
exceptions  
(access & Financial)**



**Roles update**



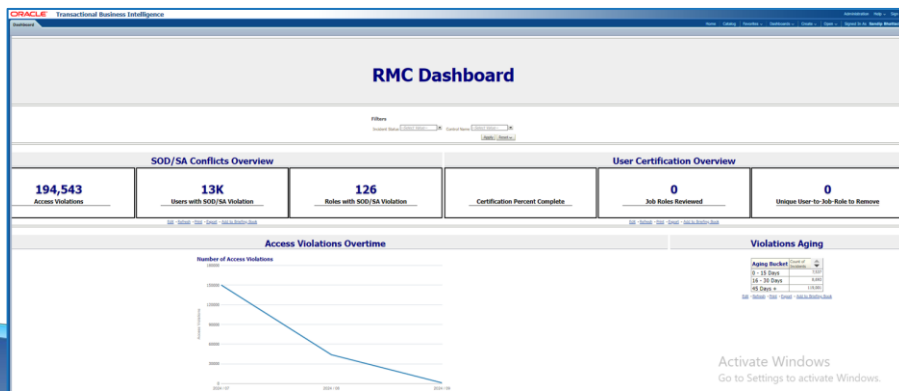
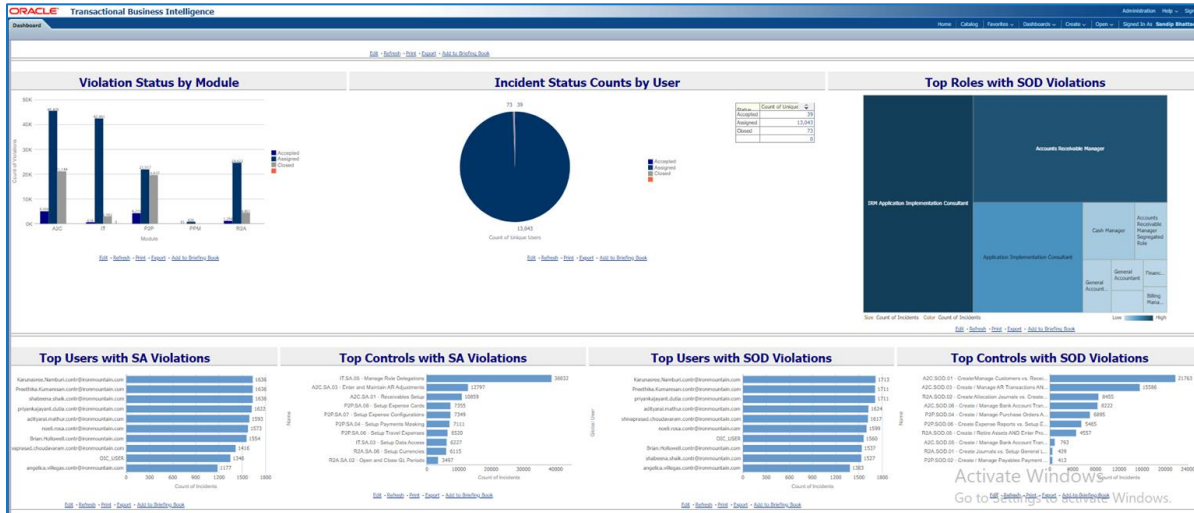
**New  
requirements for  
T&E**



# Controls deployed by IRM & Dashboards

## By Business Process

- **Record to Analyze:**  
Access / Security controls: 16  
Activity Controls: 5
- **Procure to Pay:**  
Access / Security controls: 16  
Activity Controls: 30
- **Billing & Collections:**  
Access / Security controls: 10
- **IT:**  
Access / Security controls: 6
- **Project Management:**  
Access / Security controls: 2





## Next Steps

1 Continuous improvements  
of Access & Activity  
Controls

2 Access Certification

3 Adopting the use of AI





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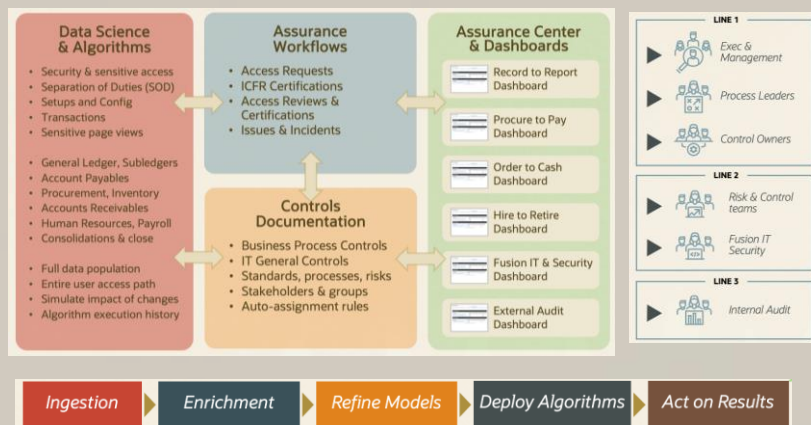
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Data below reflects legacy Six Flags only (prior to merger with Cedar Fair, completed July 1, 2024)

**\$1.4B**  
billion  
revenue  
(2022)

**41,000**  
employees  
1,450 full-time

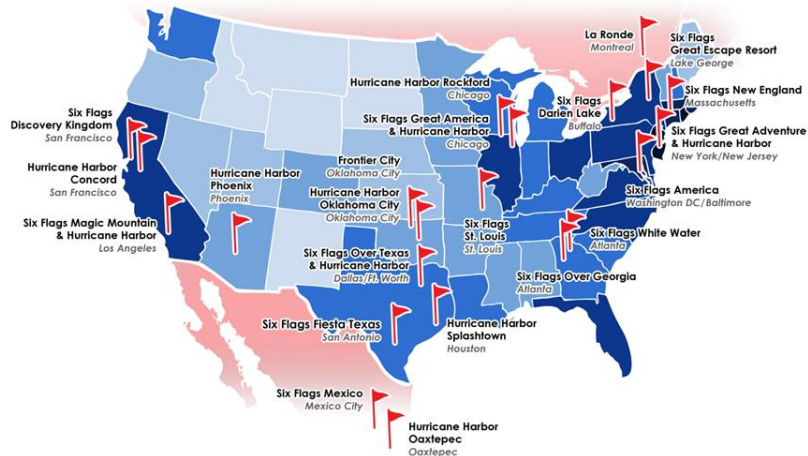
**940**  
Rides  
140 Coasters

**20.4**  
million  
guests  
(2022)

**5,850**  
acres  
of land

## 27 Strategically Located Parks

Prime locations • Economic and weather diversity



## Top-Rated Rides

Home to many of the top coasters and rides in North America:

### Wicked Cyclone



**VOTED BEST NEW ATTRACTION BY USA TODAY**  
2015 Best New Attraction

### Zumanjaro



**WORLD'S TALLEST DROP RIDE**  
41 story drop at 90 miles per hour

### The New Revolution



**WORLD'S FIRST LOOPING VIRTUAL REALITY COASTER, 360 DEGREE LOOPS**

### Goliath



**WORLD'S FASTEST WOODEN COASTER**  
World's tallest, fastest and sleepest wooden coaster

### Kingda Ka



**WORLD'S TALLEST AND FASTEST COASTER**

### Texas SkyScreamer



**WORLD'S TALLEST SWING CAROUSEL RIDE**



## Why did Six Flags choose to implement?

- **Enablement of New ERP System & Operating Model**
  - Executive Support - New CAO
  - Centralization of Finance & Accounting
  - Ability to monitor & automate internal controls for their Cloud ERP

## Scope of Work

- Financial Reporting Compliance (FRC) - Deployment of a new Risk & Controls Matrix (RCM) updated to match the current ERP
- Deployment Targeted Risks w/in Standard SOD Ruleset enabling detective monitoring
- Deployment of a new Risk & Controls Matrix (RCM) updated to match the current ERP
- Customization/Extension of the Standard Separation of Duties (SOD) ruleset - monitoring and mitigation of risks specific to Six Flags
- Role Design & deployment to correct/remediate SOD/SA design issues with out of the box roles



## Journey: Governance Process Design

Implemented Financial Report Compliance (FRC) to digitize and document their Process, Risk and Controls from the newly developed Risk & Controls Matrix.

The FRC implementation was an agile implementation approach as Six Flags needed to be educated on what was possible with FRC

Consolidated other tools reporting into Financial Reporting Compliance

Began using FRC for Section 302 reporting for SOX for Q4 2023



# Journey: Risk Management Implementation

Implemented Security/Access Monitoring & Controls  
(Separation of Duties policies/Sensitive Access) 26 Access policies implemented

Deployed Activity Monitoring & Controls including 10 Configuration/Audit & 10 transaction algorithms as mitigating or compensating controls

Security/Access Controls analyzed security based on Six Flags Segregation of Duties (SOD) controls, helping them determine where they should focus first on remediating the roles or re-designing the roles

A decision was made due to the numerous intra-role conflicts reported to deploy the HiQuest JumpStart role design accelerators



## Deployed HiQuest's JumpStart roles for Financials & Procurement

- Six Flags had been operating with out of the box roles for several years
- Reduced intra-role SOD incidents by replacing with 68 HiQuest Roles with accelerators
- Series of workshops with the business, IA and Controller
  - To determine role requirements and design deviations
  - Based on best practices & Six Flags business requirements
- As a result, Six Flags has had much fewer SOD/SA incidents to manage