

AI Mavericks & Mythos

New priorities for the internal auditor



The Institute of
Internal Auditors
Netherlands

Tjakko de Boer

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IIA Congres 2026

IIA CONGRES
2026 PRIDE &
PREJUDICE
4 & 5 JUNI AFAS THEATER LEUSDEN



AFAS
Theater

INTERNAL
AUDIT
CONFERENCE
2026



AI Mavericks and Mythos

New priorities for the internal auditor



MYTHOS



AI GOVERNANCE
Responsible.
Transparent.
Accountable.



AI THREATS
Emerging risks.
Real impact.
Proactive oversight.



INFORMATION SECURITY
Protect data.
Secure systems.
Build trust.

Including recent developments around Claude Myths

Trust
Insight
Impact



INFORMATION
SECURITY
IS EVERYONE'S
RESPONSIBILITY

AFAS
Theater

Objective

Understand how AI is changing the information security risk landscape

Learn how AI-enabled threats can accelerate exploitation of security vulnerabilities (Mythos).



Know the regulations and standards applicable to AI-accelerated environments.

Understand the security risks and opportunities created by poorly governed AI adoption (Mavericks).



Equip Internal Audit to ask better questions in an AI-accelerated environment

Agenda

- 1 Introduction
- 2 Regulatory Context
- 3 Mythos: Defending against AI
- 4 AI Mavericks: Risks when adopting AI
- 5 Conclusions
- 6 Discussion and Questions





Regulatory Context

The EU Regulatory Puzzle

Shared aim: Manage the impact of AI and cybersecurity incidents on economy and society

Trustworthy AI and Digital Resilience on the EU's digital agenda:

DORA

NIS2

Cybersecurity Act

GDPR

Cyber Resilience Act

Data Act

Digital Service Act

Artificial Intelligence Act

Cyber Solidarity Act

PSD2

Digital Euro Regulation

MiCAR

EU Health Data Space



Who is in scope?

DORA



Banks



Financial market infrastructures



Digital infrastructure



Managed ICT providers

NIS2



Transport



Health



Waste water



Digital providers



Waste Management



Manufacturing



Post and courier



Drinking water



Space



Public administration



Energy



Manufacture, production and distribution of chemicals



Research



Food production processing & distribution

Essential sectors

Important sectors

DORA: Resilience in the financial sector

The DORA requirements are structured across 5 key pillars

Governance and ICT Risk Management

- ICT Risk Management Framework including an annual report
- Strategies, policies, procedures, tools and capabilities
- Accountable management body and clearly defined governance framework
- ICT processes, services and assets
- ICT Audits

Incident Response and Management

- Monitoring, handling and follow-up of ICT incidents to the regulator
- Implement a standardized classification approach
- Compulsory and standardized incident reporting

Digital Operational Resilience Testing

- Comprehensive testing program, with a focus on technical testing
- Threat-led tests performed by independent tester every 3 years

TPRM and Contract Management

- Register of information containing ICT providers and ICT services
- Guidelines for pre-contract assessment, ongoing assessment, contract arrangements, termination and stressed exits
- Right to access, inspect and audit including third-party involvement in digital operational testing

Information Sharing (Optional)

- Guidelines on information sharing arrangements for cyber threats and vulnerabilities

NIS2: Resilience in critical sectors



Risk assessment and security policies



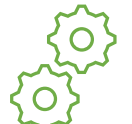
Incident handling



Business continuity, disaster recovery & crises management



Supply chain security



Security in networks, systems development and maintenance



Security assessment policies and procedures



Cyber hygiene, training & (board) awareness



Cryptography policies & procedures

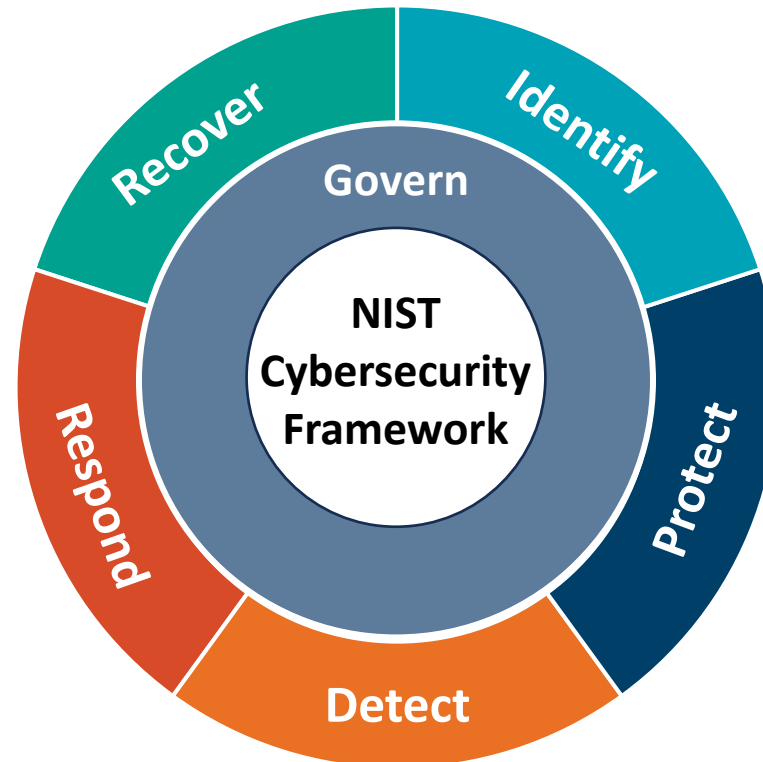


HR security, access control and asset management



Reporting obligations

NIST Cybersecurity Framework 2.0



Cyber resilience regulations and standards

Shared Theme	DORA	NIS2	NIST CSF 2.0
Governance & Oversight	ICT Governance	Management Body	Govern (GV)
Risk Management	ICT Risk Mgmt	Security Measures	Identify (ID)
Incident Response	Incident Reporting	Incident Notification	Detect + Respond
Third-Party / Supply Chain	Third-Party Risk	Supply Chain	Identify (partial)
Resilience & Recovery	TLPT & Testing	Business Continuity	Protect + Recover

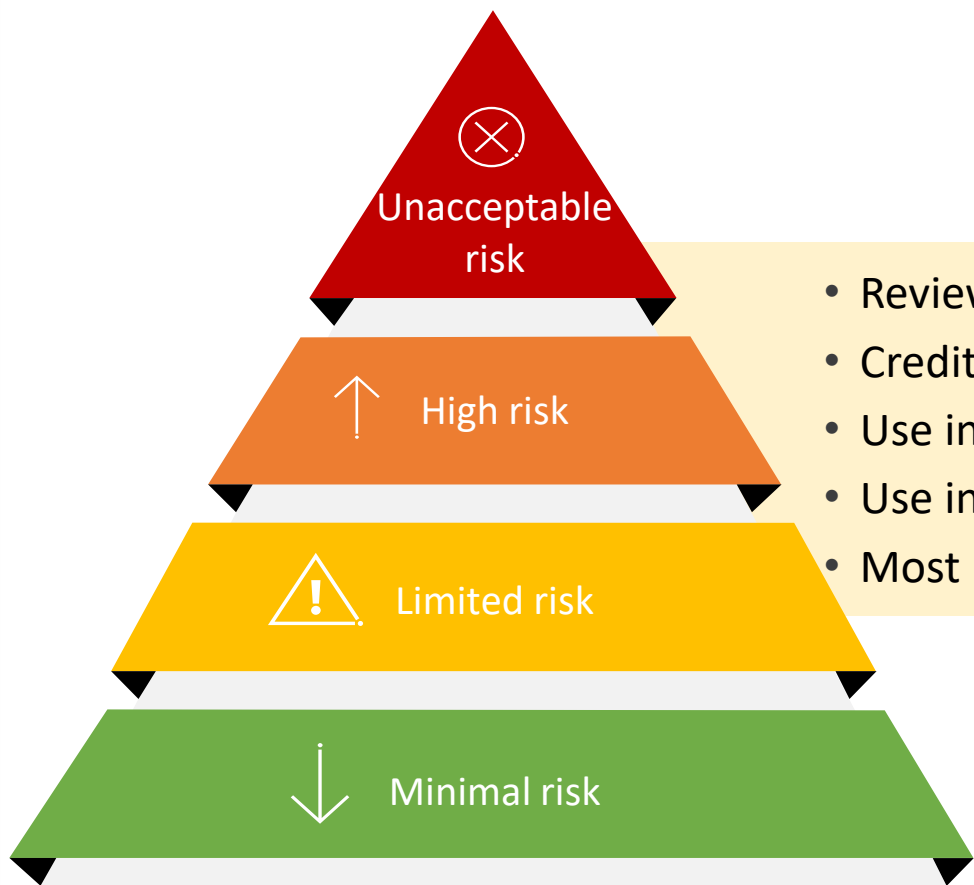
IIA's Cybersecurity Topical Requirement

- Effective per February 2026
- Mandatory to apply under IIA's IPPF
- Minimum baseline for assurance and advisory engagement
 - With cybersecurity as a subject
 - With cybersecurity identified as a risk
- 3 Areas: Governance, Risk Management, and Control Processes
- 17 Key Control Criteria
- Maps to NIST CSF



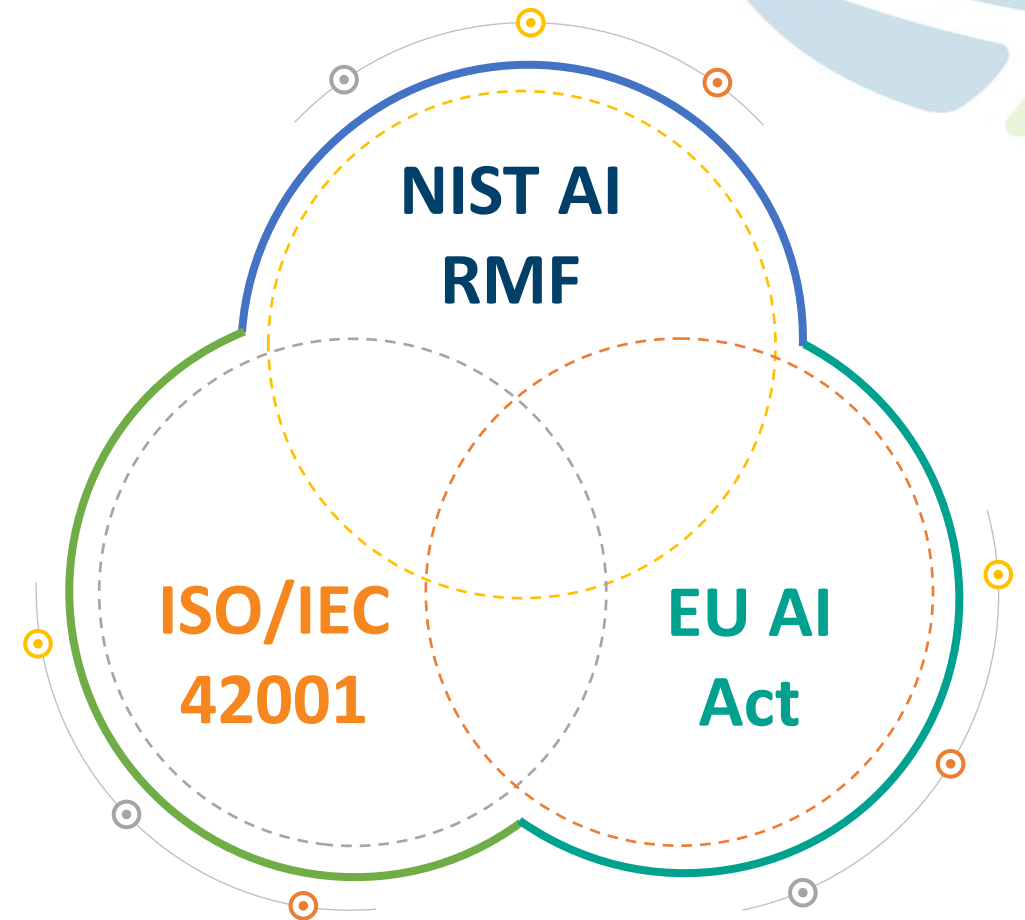
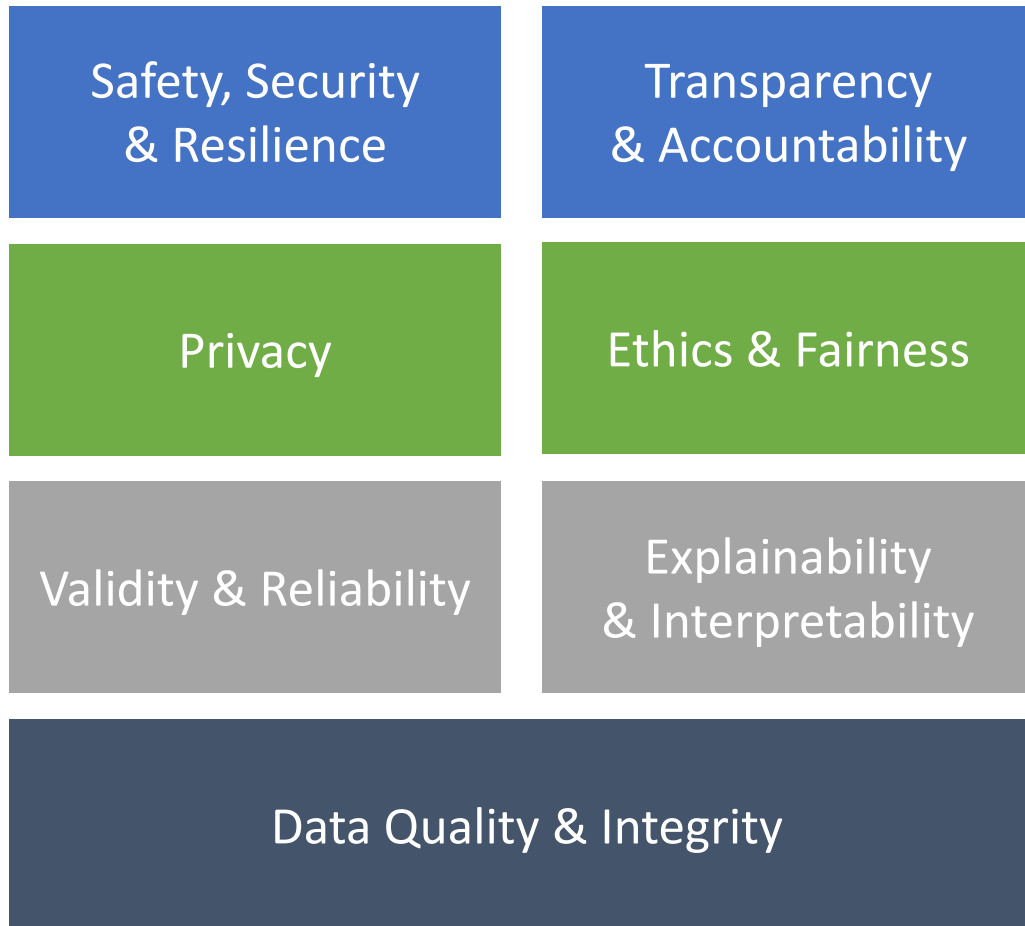
EU AI ACT

Risk classification



- Review or filter applications that evaluate applicants in interviews or tests
- Creditworthiness checks and credit score evaluations
- Use in critical infrastructure (road traffic, GWE, heat, etc.)
- Use in medical devices
- Most likely, Credit Risk systems, KYC and transaction monitoring systems

Dominant Themes in AI Standards





Mythos: Defending against AI



72%

of Mythos identified vulnerabilities was exploitable

20+ yrs

Age of some long-lived flaws Mythos surfaced

Minutes

of expected exploit time, down from days or weeks

150

Companies in Project Glasswing receiving early access

Why Mythos matters

BEFORE – Security by Friction

Cybersecurity relied on factors that slowed attackers down



Security based on complexity, lack of knowledge, ignorance



Stability of systems was leading



Change was slow, defenders had more time



NOW – AI Compresses the Attack Chain

AI systems can now do what used to take humans much longer to achieve



Accelerate exploit pathways from months to days or even hours



Discover vulnerabilities at machine speed and at scale, connecting vulnerabilities elevates the risks



Reason across complex environments turning isolated weaknesses into sophisticated attack paths



Entering a new Era for Cybersecurity

CONSEQUENCES – Resilience must match AI speed

Defenders must assume speed, scale and sophistication



See faster

Continuous visibility into assets, vulnerabilities and attack paths



Decide faster

AI-informed risk prioritization and scenario-based decisions



Respond faster

Automated, orchestrated and measurable response at speed

Era in which AI capability, cybersecurity and digital resilience are increasingly inseparable

How should organizations respond

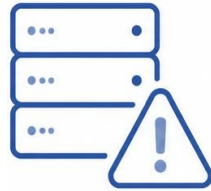
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Automate asset inventory updates

Maintain continuously updated visibility across infrastructure, cloud, SaaS, and AI assets.

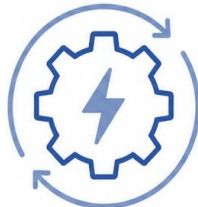
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Reduce technical debt

Legacy systems and outdated dependencies create persistent exposure.

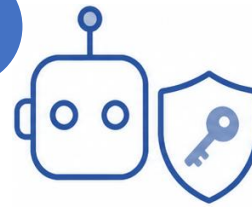
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Speed up patching and change management

Enable rapid testing, staged rollout, rollback, and emergency change.

4



Treat non-human identities as an attack surface

Govern service accounts, API keys, bots, and AI agents like privileged access.

5



Defend with AI

Use AI for detection, prioritization, triage, and response.



AI Mavericks: Risks when adopting AI

Risky behaviors of AI Mavericks

-  Using unapproved AI tools for company work
-  Uploading confidential, personal, or client data into public AI tools
-  Bypassing IT, procurement, or security review to adopt AI solutions
-  Building AI Prototypes without governance, risk, legal, or privacy involvement
-  Using AI-generated code, scripts, or content without validation or testing
-  Connecting AI tools directly to internal systems or data sources without authorization
-  Automating business decisions without human oversight or accountability
-  Circumventing policies by using personal accounts, shadow SaaS, or unofficial plugins
-  Relying on AI outputs without checking accuracy, bias, or source quality
-  Failing to document AI use cases, owners, risks, and controls

Mavericks and Access Management Challenges



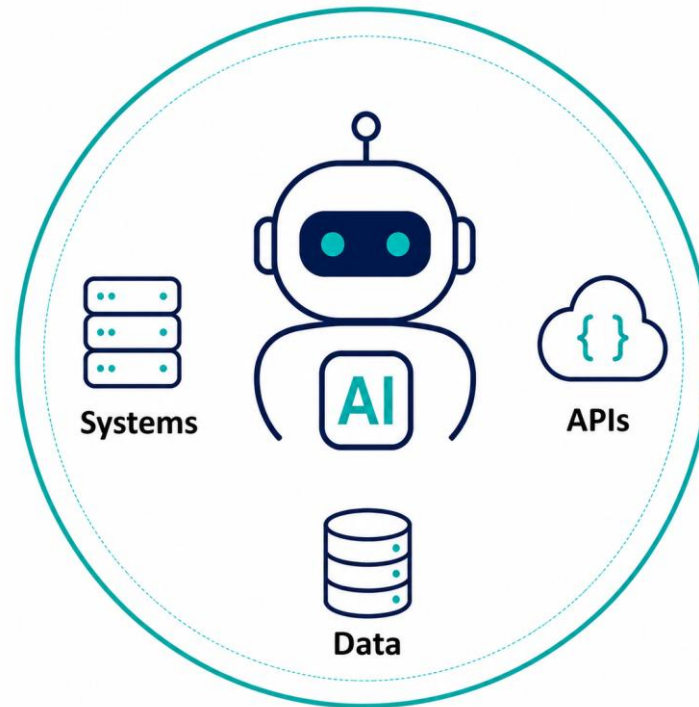
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Non-human identities



3

Broad permissions



2

Persistent 24/7 access



4

Segregation of Duties bypass



5

Limited accountability

Shadow AI



Govern AI agents like privileged access — registered, owned, approved, monitored and revocable

Mavericks and Data Governance Challenges



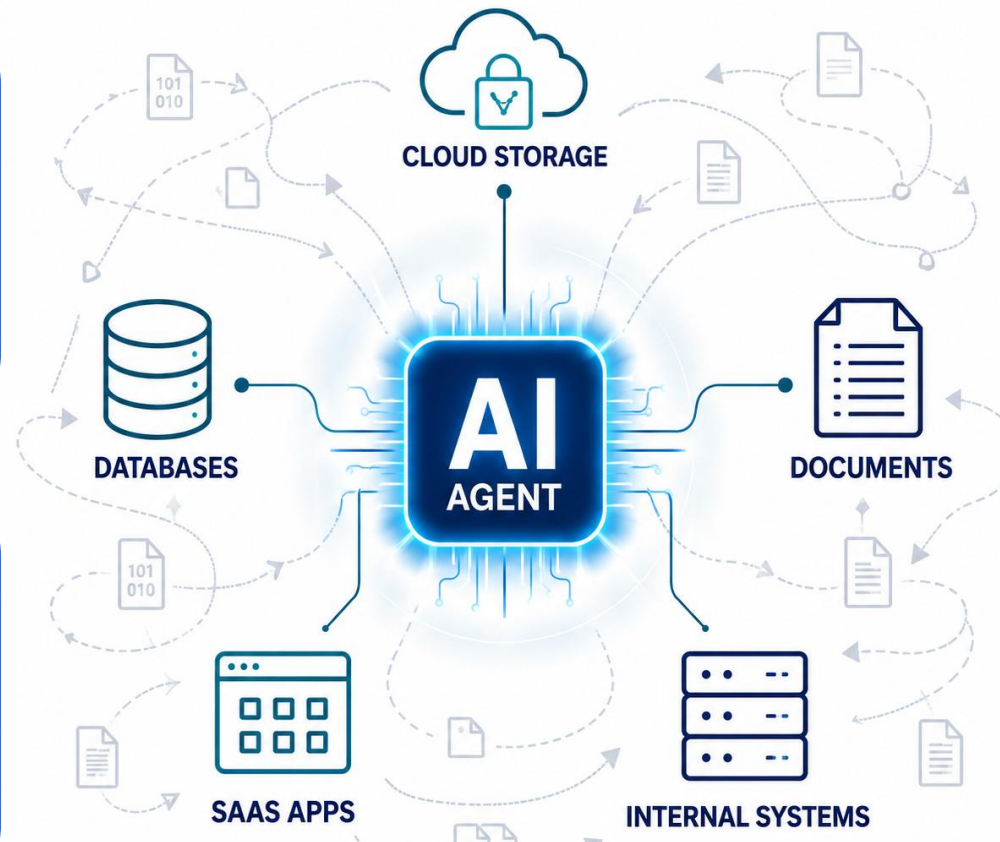
1. Shadow IT

Copies, outputs and fabricated data outside approved repositories



3. Data Protection

DLP, encryption and access controls may not follow AI-driven data flows



2. Data visibility & classification

Unclear where sensitive data sits, how it is labelled and used



4. Regulated data & retention

Personal, confidential and regulated data is used without clear rules

AI amplifies existing data governance issues by creating, copying and moving data faster than controls can follow

The Era of AI risks



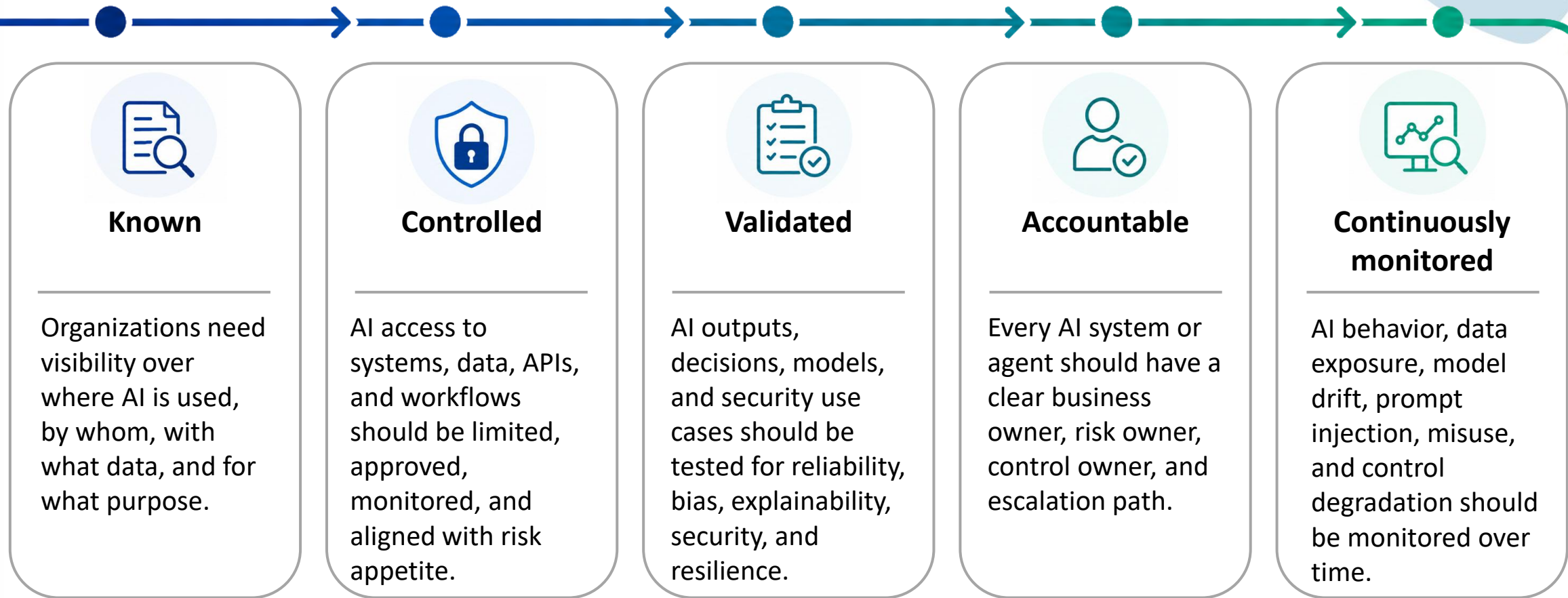
AI Risk Management to secure data, ensure trustworthy outcomes, and be compliant—at the same time



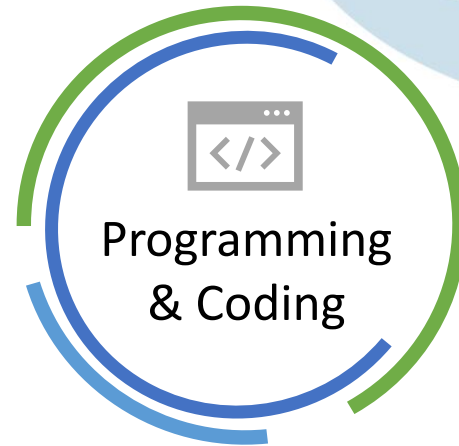
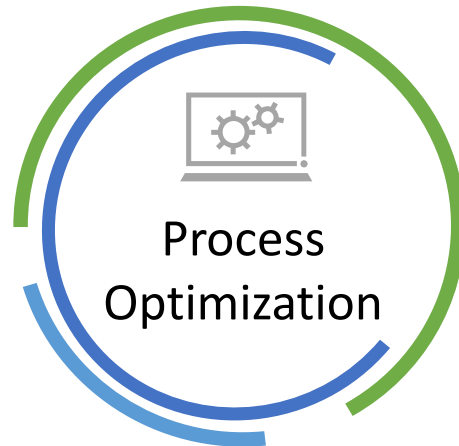
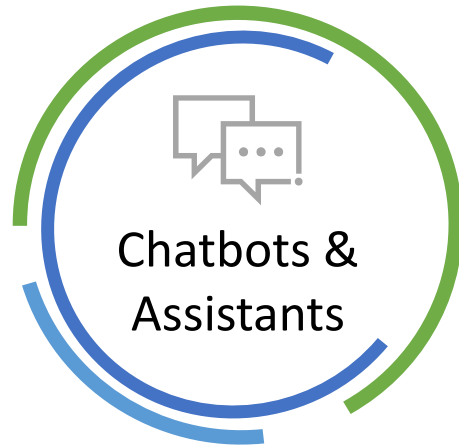
Conclusions



From Cyber Risk to AI Governance



Where can you expect AI initiatives



Conversation with Management



Value Identification

Where should we apply AI?



Data

Do we have the data and is it ready?



Skills

Do we have the talent we need to unlock the value?



Ecosystem

Where to build / buy / partner?



Experimentation

Do we have a capacity to test & learn quickly?



Change Management

Do we have an organized plan to execute?

Five Audit Focus Areas

01	02	03	04	05
Governance & Risk Oversight <ul style="list-style-type: none">• Shared CIO/CISO narrative• Audit Committee briefing cadence	Audit Plan & Change Readiness <ul style="list-style-type: none">• AI governance• Vulnerability management• Patching• Emergency change• Asset inventory• Resilience• Third-party dependencies	IT Asset Management & Attack Surface <ul style="list-style-type: none">• IT Asset inventory• Visibility of shadow resources• Rapidly identify new vulnerabilities	Vulnerability & Patch Management <ul style="list-style-type: none">• Vulnerability life-cycle management• Severity and exposure context for prioritization• Exception handling• Management of remediation speed and aging	Containment, Resilience & Recovery <ul style="list-style-type: none">• Response exercise effectiveness,• Backup restoration• Segmentation and failover,• Rapidly containment of exposure during zero-day or pre-patch scenarios.

Repositioned Internal Audit ahead of the threat



A shared view of exposure with the CISO



A focused audit plan against the highest-risk disciplines



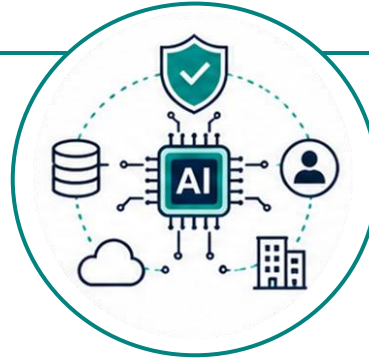
An informed Audit Committee with a tracked metric framework

Key Takeaways



1 AI compresses cyber risk timelines

See faster, decide faster, and respond faster.
AI-accelerated security, asset and patch management.



2 Agentic AI creates new control challenges

Shadow AI, Shadow data, models, and security use cases should be tested for reliability, bias, explainability, security, and resilience.



3 Internal Audit must evolve assurance

AI access to systems, data, APIs, and workflows should be limited, approved, monitored, and aligned with risk appetite.



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