The First 72 Hours:
Anatomy of a Breach Response
THE FIRST 72 HOURS: ANATOMY OF A BREACH RESPONSE

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- What if the media call for comment?
- Do I involve regulatory agencies?
- Do I hire a forensic firm or use my IT team?
- Do I need privacy counsel?
- Was PII or computerized data involved?
- Is it a breach?
- Do I involve law enforcement? – and when?
- Do I offer credit monitoring?
Background

• GlobalMart is a multinational membership-only warehouse club headquartered in Sacramento, California.

• GlobalMart operates from 232 retail locations across 47 US states, Puerto Rico, Canada, France, Germany, and the UK, with approximately 55,000 employees.

• GlobalMart’s 2015 business planning foresees a sizeable increase in e-commerce revenue and GlobalMart has spent considerable dollars to entice customers to transition to online purchasing.

• GlobalMart intends to issue a press release on October 15, 2014 regarding FY2014 Q3 earnings.
9:30AM, Friday September 26, 2014

- A store manager at a GlobalMart location in Boston, Massachusetts is making his daily rounds and notices a cashier fidgeting with a point of sale device. After close inspection, the manager removes a face plate from the device.

- The store manager reports the incident to the corporate office. He asks whether he should call the police, and what he should do next.
Tuesday September 30, 2014

• GlobalMart’s corporate office receives a telephone call from FBI Special Agent Jack Bower. Agent Bower advises that approximately four months ago a joint Federal task force infiltrated an identity theft ring with ties to criminal syndicates in Eastern Europe.

• In connection with the investigation, the FBI recently arrested the owner of Vladimir’s Janitorial Services. Vladimir provides janitorial services to 12 GlobalMart locations in Manhattan, Brooklyn, and Queens.

• A search of Vladimir’s storefront uncovered a USB drive with the: 1) names; 2) DOBs; and 3) SSNs of 17,642 corporate and retail employees spread across 34 states.

• Agent Bower provides the list of affected individuals, and advises GlobalMart to “notify affected individuals as soon as possible.”
Wednesday October 1, 2014

• 32 GlobalMart employees report receiving an email titled:
  – “2014 Recruitment Plan – Leverage Your Experience to Advance.”
  – The email includes an excel spreadsheet titled:
    • 2014RecruitmentplanSalaryEstimates.xls

• Seven employees report opening the email; two report momentarily opening the attachment.

• Preliminary forensic analysis identifies the presence of malware with known keylogging capabilities. It will take approximately two weeks to fully understand what, if anything, the malware compromised.
Thursday October 8, 2014

• A prominent blogger and journalist, Ryan Brebbs, contacts GlobalMart to request an interview with senior management about “rumors of a massive GlobalMart systems breach circulating on several known identity theft forums.”

• Within two hours of Mr. Brebbs’ phone call, GlobalMart IT/IS staff flag a suspicious email:

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From: Sergi@Mail.Ru
To: webmaster@company.com; help@company.com; postmaster@company.com
Re: владеть!!!!

Nice website you got there. Not for long. PWNED!!
Я связусь с вами о том, сколько £ £ £ мне нужно
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The outcome of the forensic investigation reveals exfiltration of 10 terabytes of customer, vendor, and employee data over the course of several months.

Ryan Brebbs publishes an article regarding the breach, and quotes an anonymous source purporting to be a former GlobalMart employee. The anonymous former employee asserts that GlobalMart had a history of poor IT controls, and a disregard for training employees on data privacy and security.

The article sets off a firestorm of media coverage, and a significant outcry on social media.

Within days several putative class action complaints across the country are filed against GlobalMart.
Wrap-up/Q&A

Questions?

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