



Case Study: QuisLex Data Breach Support

The following Data Breach case study exemplifies our experience in supporting a corporate client.

A QuisLex corporate client utilized a third-party auditor that was the victim of a ransomware attack. The auditor performed routine audits to recover duplicate payments for the corporate client. Approximately once per month, the corporate client sent the auditor a .txt file containing the supplier invoice number, invoice amount, etc. The auditor would then contact the corporate client's suppliers that received a duplicate payment to recover the duplicate payments.

The QuisLex Privacy Attorney served as the proxy for the Director of Privacy and was added to the client's incident response team to assist with the data breach resolution process, which included:

- Working with the client's information security team and engineers to understand what client data was with the auditor at that time.
- Reviewing the relevant contract(s) between the auditor and client; preparing a summary of potential remedies available to the corporate client; and providing a recommended course of action from the legal/privacy standpoint.
- Tracking the remediation process and reporting progress/setbacks to the client's Chief Privacy Officer and Director of Privacy.
- Participating in working meetings with the client and the auditor to remediate and provide notice to relevant parties, including but not limited to:
 - Compiling a list of the corporate client's suppliers that the breached auditor may have contacted on behalf of the client over the past two years.
 - Cross-referencing the list of contacted suppliers with the .txt file(s) that were with the auditor during a specified time period.
 - Determining the exact data that was compromised.
 - Reviewing and analyzing the data to ascertain the level of data, i.e., company, confidential, proprietary, etc.
 - Re-assessing the auditor for global privacy compliance and making recommendations with regard to updated privacy language in the data processing addendum.

The QuisLex Privacy Attorney is listed as the point of contact for any related data subject requests.



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