

Technical Specs | CSR Breach Reporting Service

Problem:

Businesses need to report data breaches to regulatory authorities and notify consumers. But notification regulations are complex, fragmented, require quick turnaround, and demand expertise.

Solution:

Offer businesses access to exceptional breach analysis, regulatory reporting, and customer notification expertise through a subscription service.



Awards:

U.S. Patent #8626671 "System and method for automated data breach notification," 2014 IAPP Privacy Innovation Award Winner, 2012, Info Security Global Excellence Gold, 2013

Functionality:

- Client responds to a structured phone interview designed to elicit and confirm event fact pattern. Our analysis relies 100% on client responses. All calls are recorded.
- Security incident information is processed by a combination of human expertise and proprietary machine algorithms. The result is reviewed by a supervisory board of information privacy experts with CIPP certifications.
- If the security event is deemed reportable, we report. If not, we provide the client with a professional opinion letter as to why the event does not rise to the level of reportability.
- Our regulatory reporting analysis considers an extensive range of factors:

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| • Harm threshold | • Location of affected individual (long reach) |
| • Was there unauthorized access? | • Controller vs. Processor (data owner vs. vendor) |
| • Is the data computerized? | • Timeframe for reporting |
| • Is it encrypted / redacted data? | • Law enforcement notification/delay |
| • Was the encryption key obtained? | • Consumer notification requirements |
| • Type of data | • AG, CRA, or other agency reporting |
| • Number of records | |

- Harm threshold is the most important factor. Its interpretation is solely experience-based and is a unique value that CSR provides. Harm threshold cannot be determined effectively without first processing a large number of security events.
- We determine reporting needs from 300+ regulatory bodies and 105 sovereign nations.
- Reporting to relevant agencies is done by CIPP-certified professionals and assisted by a proprietary algorithm. The algorithm compares incident data to business rules generated based on regulatory drivers.
- Determine if consumer notification is required. If so, help guide business entities with options and best practices for notification of consumers.
- All cases are handled with economic sensitivity and absolute confidentiality.
- Service is available 24/7/365 with an SLA of 2 hours.

CSR Demonstrated Expertise:

- Service in continuous use since 2012 with 100% resolution of all cases.
- 60% of cases require no reporting to regulatory agencies.
- Cases that require reporting necessitate notification to 5-6 regulatory agencies on average.
- 25% of cases requiring reports now require consumer notification, and this percentage is rising year over year.