**Landesbeauftragte
für Datenschutz und Informationsfreiheit
Nordrhein-Westfalen**

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Final decision

Data breach notification of [redacted]

IMI Case: 182054

The North Rhine-Westphalia Commissioner for Data Protection and Freedom of Information (hereinafter "LDI NRW") refers to the data breach notification of [redacted] (hereinafter “controller”). Via an Article 56 procedure (IMI No. 164822) the LDI NRW was identified as LSA. The Article 60 draft decision procedure (IMI No. 182321) was closed without objections and comments of the CSAs.

I. Case description

The controller provides to his employees a webmail front-end (outlook web access) that is accessible through the public internet. The controller has “abroad employees” in seven Member States that also use the mail servers with the webmail front-end. The controller considers the abroad employees as establishments.

An attacker used the username and password of an employee to gain access to his e-mail account. The attacker used the employee’s e-mail account to send e-mails with the purpose of financial fraud. Additionally, the attacker configured the e-mail account to forward incoming e-mails to an external e-mail address.

After becoming aware of the personal data breach, the controller blocked the compromised e-mail account to stop the data breach and checked his computer for malware. The controller notified the LDI NRW and the affected data subjects about the data breach. The controller configured a multi-factor-authentication for all e-mail accounts as a preventative measure against similar attacks.

II. Investigation procedure

The LDI NRW did not initiate an investigation procedure.

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III. Decision

The controller notified the competent SA without undue delay within 72 hours after having become aware of the personal data breach.

The controller has blocked the compromised e-mail account without undue delay. Furthermore, the computer of the affected employee was scanned for malware. Hence, the controller has taken appropriate measures to address the personal data breach.

The controller informed the affected business partners that an attacker compromised an employee's e-mail account to perform e-mail fraud, such that they are able to take protective measures in there on sphere. Hence, the controller has taken appropriate measures to mitigate possible adverse effects of the data breach.

The controller configured a multi-factor-authentication for all e-mail accounts of his employees. A multi-factor-authentication effectively reduces the risk for successful phishing, credential stuffing and password spraying attacks. Hence, the controller has taken appropriate measures to prevent successful phishing, credential stuffing and password spraying attacks in the future.

Thus, the controller fulfilled his legal obligations pursuant to Art. 33, 34 GDPR and has taken appropriate measures in reaction of the personal data breach to improve the security of processing pursuant to Art. 32(1) GDPR. The LDI NRW closes the case without further investigations or measures against the controller.

[redacted]

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