

The low down on data security post-GDPR
Frankfurt, 26 March 2018

SCCE Society of Corporate Society of Corporate and Ethics

Jonathan Armstrong and Mike McLaughlin



"...in 2005 Facebook didn't exist for most people, "twitter" was still a sound, the cloud was something in the sky, 3G was a parking space, applications were what you sent to colleges, and "Skype" was a typo."

Thomas Friedman

Cordery 2018 @Cordery U

Personal data has a value Different political reactions Different legal systems worldwide Different enforcement even within Europe Contrasting approach Europe v. US Snowden & Schrems has changed the game

EU data protection law

- Principles based
- Local law varies
- Enforcement varies
- Prior registration can be required to collect data
- Steps must be taken if transferring data to the US (or most other non-EU countries)

© Cordery 2018

@CorderyU

Article 6, principle f

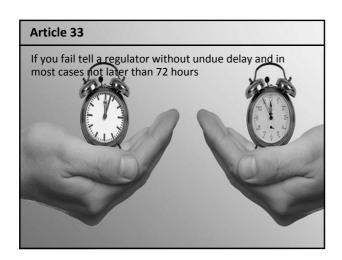
Data must be:

"processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality')."

© Cordery 2011

@CorderyUI





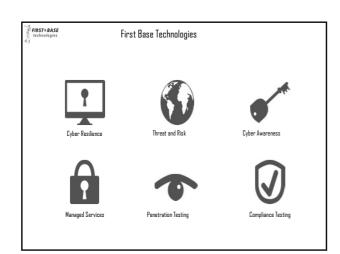


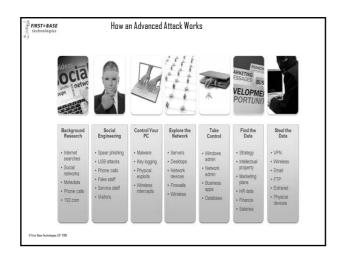
	1
Prevention	
Dutch CBP:	-
"Contingency plan Every organisation should have a contingency plan	
indicating exactly what is to happen in the event of an emergency. However, such a plan is useful only if	
personnel are familiar with it and regular drills have been held to practise its implementation"	
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
	-
Article 35	
Data Protection Impact Assessments	
© Cordery 2833 @ Cordery UK 10	
Privacy class actions]
"Material or non-material damage"	
 Controllers and processors could end up paying 	
The Schrems caseMorrisons	
 Don't look at GDPR in isolation (e.g. NIS Directive; e- Privacy Directive) 	
	1

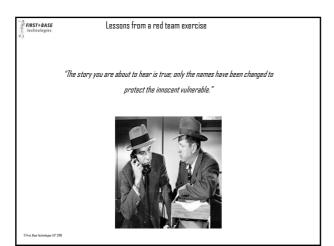
The Perfect Storm... More (& Less) More... Attacks (and cheaper too) Reliance on 3rd parties, e.g. outsourcing; Compliance and legal resources SaaS; Cloud Attention to contractual terms Cost pressure Vendor accountability Regulation and enforcement Sympathy from courts & regulators Geography Social networking Value in stolen data Speed Whistleblowers Chance of getting caught Focus on investigations Subject militancy e.g. Google case People trying to rewrite the past - because they can **Top Tips** Be secure • Insure? • Keep records (but do not fall for the Article 30 trap) • Train your staff • Have proper policies and procedures • Fire drill Resources • Short GDPR film - www.bit.ly/gdprfilm GDPR FAQs – www.bit.ly/gdprfaqs • EU Glossary - www.bit.ly/gdprwords GDPR Navigator – <u>www.bit.ly/gdprnav</u> Morrisons alert - http://www.corderycompliance.com/client-alert-morrisons-data-breach-litigation-succeeds/ Data Breach Academy - http://www.corderycompliance.com/cordery-databreach-academy-2/

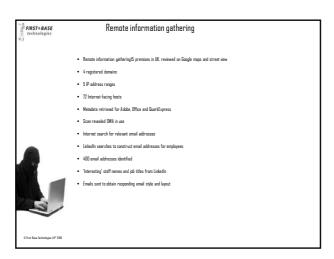


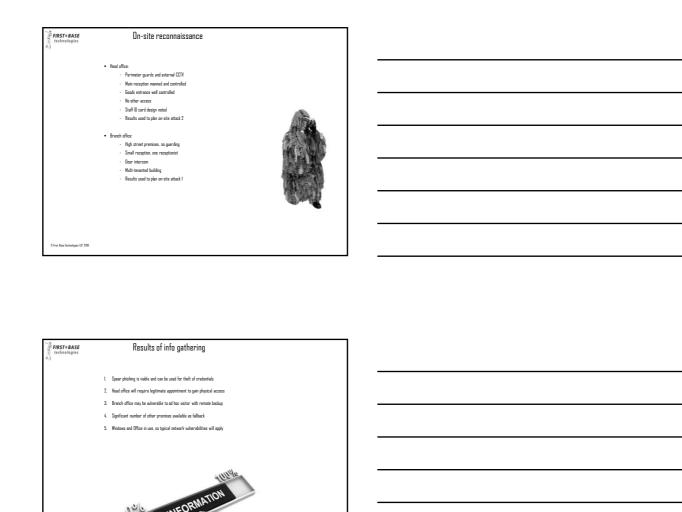








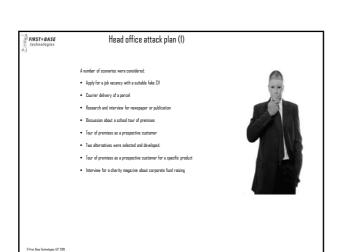




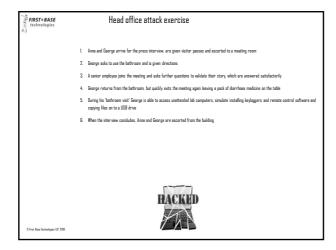
FIRST-BASE Spear phishing plan	
L. Convincing fake domain name available and purchased	
DWA site cloned onto fake domain for credential theft	
Large number of email addresses harvested as targets	
4. Design of real emails copied to facilitate spear phishing	
5. Names and jub titles gathered as fake senders	
Senuine DWA will be used to test stolen credentials (and gather further info)	
7. Credentials will be deployed in first on-site attack	
If first local foolingings IDF 2288	

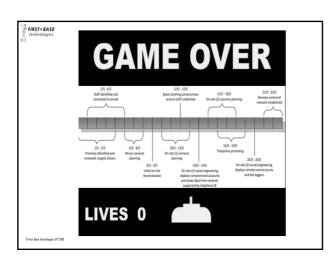
		_
FIRST+BASE technologies	Spear phishing exercise	
	L Email sent from IT manager, using fake domain address	
	2. DWA cloned on to tester's laptop. DNS set accordingly	
	Email sent to three groups of IIIO recipients Within a few minutes. 41 recipients entered credentials	_
	5. Credentials tested on legitimate DNA site	
	Significant information gathered from each account Further emails can now be sent from legitimate addresses	
	HACKED	
Il First Base Technologies LIP 2018		
FIRST BASE	Branch office attack plan	1
technologies	от инсп относ изсаск рын	
	L Team member "Harry" to pose as a contractor working for a telecomms firm	
	Clothing and ID badge prepared Warks order fabricated	
	4. Engineering tookit prepared, including laptop	
	Credestials obtained from spear phishing stored on laptop Bither team members on landine phones for remote verification	
	V	
Il First Base Technologiez 117 2018		
FIRST BASE technologies	Branch office attack exercise (I)	
43		
	Harry arrives and tells receptionist he needs to fix a network fault Receptionist asks for a contact name for verification	
	Harry claims not to know and gives receptionist his works order number and a phone number to get details	
	 Receptionist calls and speaks to George who gives the name of an II employee (who we know is 'out of effice') Receptionist cannot make contact with absent II employee, so tells Herry to call their II Manager to resolve the problem 	
	Harry calls Charle and asks him to impersonate the IT Manager	
	Chartie (impersonating the IT Manager) calls receptionist and tells them to give Harry access	
ı		

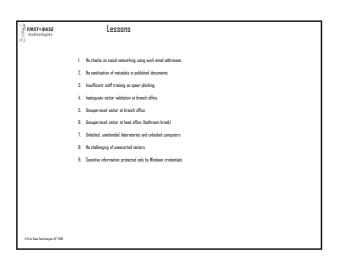
FIRST # BASE | Texhhologies | Branch office attack exercise (2) - Harry is escorted into the office and given a deak and a network point - He is left unsupervised and pluge his laptop in to the network - He explores the network and destifies exercal Windows servers - He authenticates to a domain controller using creditation obtained during the phinhing exercise - He explores servicus servers and destifies many interesting files - He plants several files to demonstrate full read-write access - He explains that he has run dispossitics and that the network connection seems oil. He is excerted to reception and signs out



FIRST BASE technologies	Head office attack plan (2)	
	Relevant domain names were obtained, email addresses and web pages created for both fake organisations.	
	L Tour of premises as a prospective customer for a specific product:	
	- "Anne" sent an email via the company's online form	
	- An exchange of emails occurred over the next few days and she obtained permission, as a new customer, to book a tour of the premises	
	2. Interview for a charity magazine about corporate fund raising:	
	- "Anne" called the company and spoke to head of fund raising team	
	Press office called Anne and asked for more details	
	- Background research proved convincing and pretext was accepted	
	- Interview booked at head office	
	Option 2 entailed less risk of exposure, so was attempted first.	
Il First Base Technologies UP 2018		







FIRST BASE technologies	Red Team Testing	
	Use your threat analysis to pick a realistic attack scenario Use your asset register to identify realistic targets Engage a red team exercise to simulate a real attack	
	Check your preventative and detective controls! Learn, improve, repeat!	
S First Sees Technologies UP 2018		

Que	estions
	Jorathan Arisstrong Cordery potathan arisstrong@corderycompliance.com «44 (0)207-075-1784 www.twitter.com/arinstrongip
	Mike Melaughin Cyber Security Operations Manager, First Base entike melaughin@firstbaser.co.uk =44 (01273 454525 @miketoclaughin