

# Daily Privacy & Consumer Regulatory Alert

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## FEDERAL DEVELOPMENTS

### CFPB IG Report

On June 27<sup>th</sup>, the Federal Reserve released a [summary](#) of an audit evaluating the security of the CFPB's complaint system called Mosaic. The full audit report is restricted. Specifically, the audit evaluated the effectiveness of specific security controls for the Mosaic system and components of the planning, development, and delivery processes used for the system as they relate to the CFPB's risk management program. The audit found that the security controls for the Mosaic system and the various components were operating effectively, including controls related to continuous monitoring and vulnerability scanning and remediation. However, the report found that the CFPB can "strengthen controls in the area of identity and access management to ensure that the security control environment for Mosaic remains effective." The audit provided one recommendation regarding identity and access management controls for Mosaic, which was concurred by the CFPB.

## INTERNATIONAL DEVELOPMENTS

### French Data Protection Authority Issues Fine

On June 28<sup>th</sup>, France's data protection authority, CNIL, [issued](#) a €75,000 against the Association for the Development of Homes for failing to adequately protect user data. An investigation found that the organization's website contained a vulnerability that allowed anyone to view user information, including names, dates of birth, addresses, marital statuses, salaries, tax notices, passports and identity cards. CNIL initially told the Association to fix the vulnerability, but it failed to correct it following another inspection conducted a few days later.

### CJEU Will No Longer Collect Names of Litigants

On June 29<sup>th</sup>, the Court of Justice of the European Union [said](#) that it will no longer identify litigants in future preliminary rulings, citing the EU's General Data Protection Regulation. The change went into effect on July 1<sup>st</sup> and now in all requests for preliminary rulings the court said it will "replace, in all its public documents, the name of natural persons involved in the case by initials." However, there is currently no plan to change how the court handles hearings or other proceedings that do not involve publications.

## OTHER DEVELOPMENTS

### Recent Data Breaches

- Whitbread, which is a UK-based company that controls coffee brands, [announced](#) that it suffered a data breach involving its online recruitment system. The system is managed by another company, PageUp, and stores information submitted to Whitbread by prospective or current employees. According to Whitbread, compromised information possibly included contact details, biographical details, and employment details, among other information. After discovering the breach, the company suspended the use of PageUp and prevented prospective applicants from uploading their information to the system.

- Typeform, a company based in Spain that provides online surveys, [announced](#) a data breach. The company said that in June 2018 an unknown party gained unauthorized access to its server and downloaded a partial backup of customers' personal information. The company did not disclose the compromised data, but said that other information was not at risk, including subscription payment data, account passwords, and audience payment data. The company notified affected customers and has since patched the vulnerability.

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