Summary Final Decision Art 60
Legal obligation
No violation

Background information
Date of final decision: 13 July 2020
Date of broadcast: 14 July 2020
LSA: DEBE
CSAs: DE, UK
Controller: Xara GmbH
Legal Reference: Personal data breach (Articles 33 and 34)
Decision: No violation
Key words: Data breach

Summary of the Decision
Origin of the case
The controller reported that the log-in information of an email account was obtained, likely through an email containing modified hyperlinks. Utilising those log in data, an administrator account was fabricated and used to send/receive emails in order to forge billing emails.

Findings
Once the activities were detected, the passwords of all accounts, including accounts with other services, were changed and a multi-factor authentication was immediately activated for account with access to sensitive data (including all employees in the finance department). Multi-factor authentication is planned for all accounts in the future. All affected workstations were subjected to a virus scan.

All data subjects concerned were notified of the breach via email.

Decision
In light of the above, the LSA has closed the case and has not identified any data protection violations beyond Articles 33 and 34 GDPR.