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European Data Protection Board
EDPB Guidelines 01/2021 on
Examples regarding Data Breach Notification

Reply to consultation

Securing your data

Introduction

We are a cyber security firm specialized in web application security. With the increased demand for self-service, companies have invested heavily in making consumer information available online through web applications. Developing more features for customer delight, wins typically from improving security. Making sure that companies build safer applications must therefore come from a non-commercial body. Keep up the good work EPDB!

General finding guidelines 01/2021

All measures, means of mitigation and preventions mentioned in the guidelines are based on the old methods of cyber security. The new digital world requires modern methods of protection. For web applications specifically we have an addition to make things safer.

Rapid changes

Online environments change so rapidly that periodic measures (i.a. penetration testing) need to be layered with continuous testing of the durability of your environment. Continuous testing of the impact of the changes that took place. This can be done by continuous analysis of the logging.

Log analysis

Point 49 mentions logging as a measure of determination after the fact. European citizens want data breaches to be investigated, but even more they want them to be prevented! Continuous log analysis is an excellent measure to prevent breaches taking place. It provides insights in accurate actual threats besides the use for prove after the breach.

Suggested sentence

Forwarding or replication of all logs to a central log server to log and to analyse for actual current threats.

Benefit for EDPB and Citizens

Analysing actual threats surfaces breaches quicker and prevents more data being exfiltrated. Besides, it gives the EU citizens quicker information of where their information might have been compromised. It takes an average of 9 months before companies realise a data breach has taken place.

Thankful to be able to add to a safer digital Europe!
Let me know if there are any further questions

Ir. Joost Sprakel