

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Investigation of the case:

Paris, 16 JAN, 2024

[REDACTED]

N/Ref: [REDACTED]

Referral [REDACTED]

(to be included in all correspondence)

Dear Sir,

I am following up on the various exchanges that took place between the services of the French Data Protection Authority ("CNIL") and yourself, concerning a personal data breach of which [REDACTED] became aware on August 28, 2022.

This security incident affected many people in Europe. In this context, a complainant lodged a complaint with his national data protection authority against [REDACTED] on October 10, 2023, concerning the lack of information relating to a personal data breach. This complaint was then forwarded by the Lower Saxony state data protection authority to the CNIL services on October 28, 2022, pursuant to Article 56.1 of the General Data Protection Regulation ("GDPR").

In particular, the complainant is surprised to have been informed of this security incident on the [https://www.\[REDACTED\].website](https://www.[REDACTED].website) by the "Have I been Pwned" platform and not by the [REDACTED] company.

As part of the discussions that took place between [REDACTED] and the CNIL departments in charge of data breaches, the latter adopted several measures to minimize the consequences of the data breach by :

- notifying the CNIL of the personal data breach on August 30, 2023, in accordance with Article 33 of the GDPR ;
- correcting the security incident, by implementing the following measures: setting up a connection to a virtual private network, multi-factor authentication for all accesses to the administrative platform containing user data, and changing all employee passwords with access to the administrative platform;
- informing data subjects individually on November 19, 2022 of the personal data breach.

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In view of the above, the measures taken to correct the security incident and to inform the persons concerned of the occurrence of a personal data breach lead the CNIL, in agreement with the other European data protection authorities, to **close this complaint**

However, please be aware that the CNIL reserves the right to make use of all the powers granted to it by the GDPR and by the French Data Protection Act of January 1978 as amended.

Yours sincerely,

For the the CNIL Chair and on her behalf,

A large black rectangular redaction box covers the signature area. Below it, there are three smaller black rectangular redaction boxes of varying widths, likely covering the name and title of the signatory.