

ETHICAL CONSIDERATIONS

UNIVERSITY OF X CREDIT CARD BREACH

TABLE TOP EXERCISE



Incident Description

- University Police are notified by the Secret Service that a series of credit card numbers have been compromised and the common merchant account belongs to U of X.
- The merchant number is tied back to the Athletics department and it is discovered that Information Security was never notified that this new merchant account was requested and issued.

Incident Description (cont'd)

- Upon further investigation, it is determined that the account is tied to a server running in the Athletics department.
- This is deemed a “Special Response” incident, due to the fact that card holder data (CHD) is involved.

Considerations

- What could happen if the breach could not be immediately contained?
- What forensic considerations should be made?
- Is there a risk of continuing related operations?
- Who needs to be notified, both internally and externally?

Considerations (cont'd)

- Are formal notifications required by law?
- If so, how will notifications to individuals be handled with no current contact information?
- When should systems be restored?
- Are there other potential risks related to the source of the incident?

Considerations (cont'd)

- Besides the incident response team, what external departments should be involved?
- What steps should be taken internally to control external communications?
- How would a breach of this magnitude affect U of X's reputation and can it be mitigated? If so, how?

Incident Update

- Upon further review of systems it is determined that an event registration application being run by the Athletics department has been compromised.
- The event is in it's last day of registration and Athletics expects \$100,000 in registration revenue by end of day.

New Considerations

- Should any of the previous decisions be changed given the update?
- If donor information was compromised are there special considerations or notifications to be made?
- If Granting Agencies funds are involved, do they need to be notified?
- Anything else to consider?