

Summary Final Decision Art 60

Legal obligation

No violation

EDPBI:DEBE:OSS:D:2020:124

Background information

Date of final decision:	13 July 2020
Date of broadcast:	14 July 2020
LSA:	DEBE
CSAs:	All SAs
Controller:	Dubsmash Inc / Mobile Motion GmbH
Legal Reference:	Personal data breach (Articles 33 and 34)
Decision:	No violation
Key words:	Consumers, data breach, social media

Summary of the Decision

Origin of the case

The controller notified the LSA of the data breach having been made aware of a data dump for sale on the internet by an investigative reporter. The controller immediately launched an investigation and could verify the content of the database as being the controller's data. The data dump contained users' public information such as usernames, first and last names, photos and encrypted passwords. Some users also supplied additional private information that is believed to be part of the affected data: email, birth dates, phone numbers, device country/ language information and profile pictures.

Findings

The reason why the attackers were able to steal user data and publish it on the darknet could not be determined, partly because no access logs were available. The access logs to backup data showed no abnormalities. In addition, penetration tests were carried out. The controller hired a forensics firm to identify network vulnerabilities, but this was unsuccessful for the reasons mentioned above. Log in credentials were changed and access controls were reviewed.

The concerned data subjects were informed of the incident and press releases were published on the same day.

The controller has taken a large number of subsequent measures to ensure that a high risk to the concerned data subjects is no longer likely to materialise including investigations on access control and performing forensic examinations of logs. Users were advised to change their passwords regularly and to avoid the cross-platform use of passwords and two factor authentication has been introduced for relevant services.

Decision

Considering the above, the LSA has closed its investigation. The LSA has not identified any data protection violations.