Privacy incident report received

Alert Notification Recommendation Group

Consult Police for suspected criminal activity. If yes, Police primary investigators.

Non-electronic information only

IT security incident also involved?

Joint follow-up by CISO and Pitt CSSD IT Security

CISO logs complaint and/or incident

CISO documents alleged incident. If no police involvement, also directs investigation.

Was breach of privacy confirmed?

Is/are breach subject(s) aware of alleged incident?

Was breach of privacy confirmed?

Restricted information involved?

Yes

Yes

No

See Notification Process Flowchart

CISO updates breach history files with resolution and forwards a copy of resolution to OGC

END OF PROCESS

Send individuals a letter stating that no violation has occurred

CISO refers findings of investigation to leadership, if necessary
Privacy Incident Report received

Customer Information Security Officer (CISO) oversees investigation of alleged incident

Was breach of privacy confirmed?

Yes

Requirement for notification certain?

No

CISO & Notification Group consult Privacy Breach Response Handbook

Yes

Inform affected individuals of incident?

No

CISO documents decision to not inform individuals and reason.

Yes

CISO notifies University leadership of decision

As required, CISO drafts letter to credit bureaus, required agency reporting, prepares FAQs and distributes

CISO drafts letter to affected individuals in consultation with Media Relations. OGC approves letter and the head of the affected department signs and sends the letter to affected individuals

CISO updates breach history files with resolution and forwards a copy of resolution to OGC

END OF PROCESS
Data Breach Response Checklist

- Initial Credible Report
- Notification to Notification Recommendation Group and Senior Staff
- Notification to the Head of School or Division
- Consult Flow Charts
- Prepare Notification Memo to Individuals
- Prepare Script and FAQs
- Prepare Press Release/Statement
- Activate Hotline with CSSD Assistance
- Follow Law Enforcement Recommendations
- Prepare Report to Credit Bureaus
- Prepare Agency Reports as may be Required by Law
- Prepare Staffing Plan to Create Letters, Staff Phones, etc.
- Prepare Notification to Credit Card Processor (if necessary)
- Keep Chronology of Steps Undertaken
- Forward Legal Questions to OGC
- Forward Claims to Risk Management
- Audit Related Areas as Necessary
- Conduct After Action Review