

35761 Gallagher Bassett Claims Management

Does your Council use Gallagher Bassett as a Claims Management or Handling Company?

Yes

If your Council does use Gallagher Bassett then:

Is your Council aware of the Gallagher Bassett Ransomware/Data breach in June to Sept 2020?

Yes

Has your Council been contacted by Gallagher Bassett over the Ransomware/Data breach?

Yes

Did Gallagher Bassett identify any claimants who may have had their “notifiable” data exposed? How many were identified?

There were no such claimants.

How many “notifiable” claimants were identified?

None

Did your Council raise the matter with the ICO? If so, what was the Incident reference number?

Yes – An initial report was raised when the breach was first reported to the City of Edinburgh Council (when Gallagher Bassett were in the process of validating the breach data).

Did Gallagher Bassett identify any others that may have had their data exposed? (EG Name, Account and Amount received?) How many were identified?

After the final data validation had been completed, there were none identified.

Did Gallagher Bassett raise any of the above to the ICO?

They advised they had reported the breach to the relevant regulators (As they are an international company, it was not only the ICO involved).

Did your Council, after identifying others that were not “notifiable” raise a further matter with the ICO?

No

What was the advice from the ICO on these matters?

Not applicable

Has your Council contacted any of the “notifiable” claimants of the data breach?

Not applicable

Has your Council contacted any of the non “notifiable” claimants of the data breach?

No

Does your Council allow for Claimants to object to their data being processed by an external firm?

Our privacy notice confirms how data will be processed. Claimants are therefore able to object to their data being processed externally; however, we would not be able to progress their claim if this was the case.

Do you inform your claimants that their data will be transferred outside of Europe for processing?

This information is included in our Privacy Notice which is published on our website at:

<https://www.edinburgh.gov.uk/downloads/file/29829/insurance-privacy-notice>

How much last year did your Council pay Gallagher Bassett for all its services?

This information is withheld under Section 33(1)(b) - Commercial interests and the economy.

What is your Information Security / Cyber Security Vendor Management Due Diligence questions on engagement of a Vendor such as Gallagher Bassett?

In addition to a full data privacy assessment, new vendors are assessed against a combination of the supply chain and cloud security principles, dependant on the service being provided, and the level of risk.

Details of the 12 Supply Chain Principles and the 14 Cloud Security Principles are available through the following links to the National Cyber Security Centre:

<https://www.ncsc.gov.uk/collection/supply-chain-security/principles-supply-chain-security>

<https://www.ncsc.gov.uk/collection/cloud-security/implementing-the-cloud-security-principles>

Supporting evidence such as Penetration Testing, Compliance Certificates (ISO27k Series, CE+ etc.) are also considered when assessing vendors.