

# Kahn Consulting, Inc. Insights

November 7, 2023

## Use of Email “To” and “Carbon Copy” Causes UK Information Commissioner’s Office to Reprimand Two Organizations

Does your organization have rules about the use of Email "To" and "CC" when sending an email to more than one person? If it doesn't, it should! The UK Information Commissioner's Office (ICO) reprimanded two Northern Irish organizations, the Patient and Client Council (PCC) and the Executive Office, for improperly disclosing people's information via email. The PCC sent an email to 15 individuals with gender dysphoria using the carbon copy (cc) option, inadvertently revealing recipients' identities to each other. The Executive Office's Interim Advocate's Office sent an e-newsletter to 251 subscribers, disclosing their email addresses, potentially indicating them as victims or survivors of abuse. The ICO emphasized that such data breaches are preventable and stressed the need for organizations to train their staff properly and implement appropriate systems and policies to avoid such incidents. Both organizations were found to have inadequate guidance for bulk email communication. The ICO recommended that they update their policies and procedures and provide staff with appropriate email use guidance within three months of the reprimands.

Read more [ICO warns of email data breach risk as it issues two reprimands | ICO](#)



## Exposed: The Hidden Dangers for Executives - Unveiling the Personal Liability in Cybersecurity Deception

In a recent development, the Securities and Exchange Commission (SEC) has taken legal action against SolarWinds Corporation, a software company based in Austin, Texas, and its Chief Information Security Officer, Timothy G. Brown. The SEC alleges that SolarWinds and Brown committed fraud and internal control failures related to known cybersecurity risks. Specifically, the complaint asserts that SolarWinds misled investors by overestimating its cybersecurity practices and downplaying or omitting significant risks.

[Keep Reading SEC Press Release](#)



## Broker-Dealers and Investment Advisers: Personal Text Messages and Off-Channel Communications

In September the Securities and Exchange Commission (SEC) has announced charges against several broker-dealers and investment advisers for widespread and long-standing failures to maintain and preserve electronic communications. The firms admitted to communicating through personal text messages and off-channel communications related to business matters, violating recordkeeping provisions of federal securities laws. As a result, these firms have agreed to pay combined penalties totaling \$79 million. The SEC's investigations revealed these failures involved employees at various levels, and the firms were charged with violating recordkeeping provisions and failing to supervise to prevent and detect these violations. In addition to financial penalties, the firms were censured, ordered to cease future violations, and required to engage independent compliance consultants to review their policies and procedures regarding electronic communications retention on personal devices.

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## **Catch Randy Speaking at the Twin Cities ARMA Chapter on November 14th (Virtual Session)**

**Topic:**

Information has never been more important and more confounding. Company records are a source of competitive advantage, the life blood of every organization and a major challenge to manage. Today, executives see information as a major asset and potential risk and are now asked to be something well beyond what they signed up for. This session is way beyond the record storage boxes sitting in offsite storage. We will go on a journey from where you were yesterday to where you need to be tomorrow. You will learn, hopefully, you will be reinvigorated and we will have some fun along the way.

[Register Here](#)

## **Contact Us**

You can schedule a time to discuss information management topics with a subject expert on the Kahn team [here](#) or by emailing [awcollison@kahnconsultinginc.com](mailto:awcollison@kahnconsultinginc.com) or calling (989) 763 - 6611. We enjoy sharing industry knowledge and learning from others, so please feel free to reach out to us.