

# Data Security Breach Notice Letter

DANA B. ROSENFELD & ALYSA ZELTZER HUTNIK, KELLEY DRYE & WARREN LLP

A letter from a company to individuals (for example, employees or customers) notifying those individuals of a data security breach involving their personal information. This Standard Document has integrated notes with important explanations and drafting tips.

## DRAFTING NOTE

### Read This Before Using Document

To date, most states, the District of Columbia, Puerto Rico and the US Virgin Islands have enacted data breach notification laws requiring businesses and other entities to notify affected individuals when a data breach involving their personally-identifiable information (also referred to as PII or personal information) occurs. The requirements of these laws vary and sometimes conflict, creating a significant compliance challenge for companies suffering a data security breach affecting individuals residing in multiple states. There is no single form letter that guarantees compliance with all of these laws. However, a common strategy to respond to this challenge is to:

- Review the breach notifications laws for each relevant state (meaning those states where individuals whose personal information is held by the company reside).
- Draft one template letter that meets the requirements of most of those state laws and one or more additional template letters to address relevant states having conflicting or more restrictive requirements.

This Standard Document provides a general template to assist in preparing data breach notice letters for affected individuals in connection with state data breach notification requirements. It must be tailored to:

- Reflect your company's particular circumstances and to address the specific state law requirements.
- Account for industry-specific federal or state legal requirements.

The contact information provided in the sample letter for federal and state agencies as well as the national consumer reporting agencies should always be checked to ensure that it is up to date.

This Standard Document is not intended for use by companies subject to breach notification requirements under the federal Gramm-Leach-Bliley Act (GLBA) or Health Insurance Portability and Accountability Act (HIPAA) (for more information on GLBA and HIPAA, see *Practice Note, US Privacy and Data Security Laws: Overview* (<http://us.practicallaw.com/1-501-4555>)).



# Data Security Breach Notice Letter Kelley Drye Warren

**AW Rasmussen**



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**Homeland Security Law Handbook** Blank Rome, Kelley Drye Warren, 2003-10-01 The new Homeland Security Law Handbook provides a comprehensive reference book for business industry and government as well as those faced with the new legal and security issues raised by new public laws a new regulatory framework and a new Department of Homeland Security Written by legal experts from four law firms it covers the major issues involved with homeland security Part I covers broad concepts and cross cutting issues in this emerging field as well as the various legal mandates that now apply to homeland security An analysis summary and political context of homeland security statutes and their subsequent regulatory mandates are also discussed Part II includes detailed discussions of public safety issues including aviation and transportation security port security and chemical security the public health issues of bioterrorism and air food and water supply contamination border and immigration concerns cyber security appropriations grants and contracts insurance and workplace issues and information and disclosure issues in audits Part III covers the creation mandate and organization of the new cabinet department with its powers practices procedures and responsibilities Each of the four Directorates and their organization function major issues and transitional challenges are also analyzed **FCC Record** United States. Federal Communications Commission, 2016 **BNA's Employment Discrimination Report**, 1999 *Data Breach Notification Laws* Jonathan M. Joseph, 2015

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