

12.05.2023

New sanctions

The National Supervisory Authority completed, in April 2023, two investigations of insurance operators.

The investigations were started as a result of data security breach notifications that were sent by NN Pensii Societate de Administrare a unei Fond de Pensii Administrat Privat S.A. and NN Asigurări de Viață S.A.

As such, it was found that:

The operator of NN Pensii Societate de Administrare a unei Fond de Pensii Administrat Privat S.A. violated the provisions of art. 32 para. (1) lit. b) and d) and art. 32 para. (2) of Regulation (EU) 2016/679 and was fined in the amount of 7,407.00 lei (the equivalent of 1500 euros).

The operator NN Asigurări de Viață S.A. violated the provisions of art. 32 para. (1) lit. b) and d) and art. 32 para. (2) of Regulation (EU) 2016/679 and was penalized with a fine of 4,938.00 lei (the equivalent of 1000 euros).

1. As part of the investigation carried out at the operator NN Pensii Societate de Administrare a unei Fond de Pensii Administrat Privat S.A. it was found that he made a series of changes to the configuration of the equipment that ensures the temporary storage of the web pages of the NN Direct application, made available to customers, the option to keep the web pages in its memory being activated. As such, this situation resulted in some users of the operator's application viewing, for a period of time, personal data that did not belong to them.

From the checks carried out, it turned out that this situation led to unauthorized access and the loss of confidentiality of personal data (surname, first name, personal numerical code, address in the identity card, mailing address, e-mail address and telephone number) 2 persons being affected by the incident. It also emerged that, prior to making the NN Direct application available to the public, the device-specific configuration changes that ensure the temporary memory of its web pages were not subjected to an operator-level testing process.

The National Supervisory Authority found that the operator NN Pensii Societate de Administrare a unei Fond de Pensii Administrat Privat S.A. has not implemented adequate technical and organizational measures to ensure a level of security appropriate to the risk of processing, including the ability to ensure the confidentiality, integrity, continued availability and resilience of processing systems and services and a process for periodic testing, evaluation and assessment of effectiveness technical and organizational measures to guarantee processing security.

At the same time, the operator was ordered and the corrective measure to implement a procedured and promoted test mechanism at regular time intervals through which tests are carried out on the possible configurations of the active applications available to the clients of NN Pensii Societate de Administrate a une Fond by Pensii Administrat Privat S.A., respectively documenting the results by applying remedial measures in order to avoid similar security incidents.

2. As part of an investigation at the operator NN Asigurări de Viață S.A. it was found that he made a series of changes to the configuration of the equipment that ensures the temporary storage of web pages of the NN Direct application, made available to customers, with the option to keep web pages in its memory being activated. Therefore, it was possible for some users of the operator's application to view, for a period of time, personal data that did not belong to them.

As a result of the checks within the investigation, it turned out that this situation led to unauthorized access and the loss of confidentiality of personal data (surname, first name, personal numerical code, address in the identity card, mailing address, e-mail address and phone number). At the same time, it emerged that, before the NN Direct application was made available to the public, its changes were not subjected to a testing process by the operator.

The National Supervisory Authority found that the operator NN Asigurări de Viață S.A. has not implemented adequate technical and organizational measures to ensure a level of security appropriate to the risk of processing, including the ability to ensure the confidentiality, integrity, continued availability and resilience of processing systems and services and a process for periodic testing, evaluation and assessment of effectiveness technical and organizational measures to guarantee processing security.

At the same time, the operator was ordered and the corrective measure to implement a procedured and promoted test mechanism at regular time intervals, through which tests are carried out on the possible configurations of the active applications available to NN Asigurări de Viață S.A. customers, respectively documenting the results by applying remedial measures to avoid similar security incidents.

Legal and Communication Department

A.N.S.P.D.C.P