

CAPA Reference No.: 18		Start Date: 26-4-2025
Non Conformity / Improvement/ Preventive Action:		
An employee that was leaving involuntarily sent some confidential data to an external mail address		
Details		
<p>An employee's contract was not renewed due to inadequate performance. After an interview was held, colleague saw that some documents on a shared drive were missing. Based on this, the Operational Director of E-WISE started an investigation on June 5th of the mail behaviour of the employee by Reducate system administrator.</p> <p>This employee sent some email messages containing information about customers to his own external email address. This involved names and business email addresses of these customers. This involved a total of 29 emails</p> <p>In addition, there are indications that this person opened the company applications on a private laptop. This is against the Information Security Policy</p> <p>After this was discovered, E-WISE filed a lawsuit against this person to ensure the information would be destroyed.</p> <p>In the settlement agreement (VSO) the employee agrees that she does not hold any information anymore that belongs to the E-WISE business.</p> <p>Tot slot wijzen wij u er nadrukkelijk op dat u met ondertekening van de vaststellingsovereenkomst expliciet verklaart dat u geen enkel bedrijfseigendom – waaronder, maar niet beperkt tot, digitale bestanden, fysieke documenten, vertrouwelijke klantgegevens, interne rapportages en e-mails – meer in uw bezit heeft, dan wel op enigerlei wijze heeft gekopieerd, opgeslagen of gedeeld met derden.</p>		
Present Status	Target:	Target Date:
Closed	Have the personal information removed.	25-6-2025
CAPA Leader: Johan Assen		
<p>Team Member: All people that were involved in processing the issue</p> <ol style="list-style-type: none"> 1. Nilufer Akpınar 2. Tigran Khatchadrijan 3. 4. 5. 		

CAPA FORM

Corrective Actions & Preventive Actions

Format No.:

6.			
Root cause analysis / Size			
<p>Root cause was a labour conflict between the employee and employer. The employee indicated that she wanted to retain some proof of her performance.</p> <p>The size was 29</p>			
In case of non conformity or incident: how is evidence secured?			
All evidence is filed with the operational director of E-WISE due to the sensitive nature of this situation			
Corrective action:	Responsibility	Target date of completion	Actual date of completion
Gather forensic evidence on the business laptop and Google account of the user. OPE-192	Tigran Khatchadrijan	13-6-2025	13-6-2025
Discuss this information with the lawyer	Nilufer Akpinar	13-6-2025	13-6-2025
File lawsuit or agree on VSO to have the information removed	Nilufer Akpinar	25 juni 2025	25 juni 2025
Horizontal Deployment / Preventive Action	Responsibility	Target date of completion	Actual date of completion
We discussed this in the most recent GDPR meeting and concluded that is very difficult to make this airtight when an employee is handling in bad faith. We will inform the staff during the next townhall meeting on their responsibilities in protecting our data	Johan Assen / Nilufer Akpinar	30-6-2025	30-6-2025
Document change :	Responsibility to change	Target date of completion	Actual date of completion
Update the Information Security Policy to make the rules on personal devices more clear. See:	Johan Assen	30-6-2025	30-6-2025
Verified By : Nilufer Akpinar / Stephan Csorba			