

# CONFIDENTIAL NOTIFICATION OF A PERSONAL DATA BREACH TO THE NORWEGIAN DATA PROTECTION AUTHORITY

## 1. INTRODUCTION

This notification of a personal data breach is submitted by BakerHostetler on behalf of:

- a. Name and address of company: **Gravy Analytics / Unacast**
- b. Point of contact within the company (name, role, email, phone number):

[REDACTED]

- c. Point of contact at BakerHostetler (name, role, email, phone number):

[REDACTED]

## 2. ABOUT THE INCIDENT

- a. Description of the personal data breach.

On January 4, 2025, Gravy Analytics, a subsidiary of Unacast, Inc., identified unauthorized access to its AWS cloud storage environment. The unauthorized person obtained some files, but the contents of those files and whether they contain personal data remains under investigation. Gravy Analytics is informing Datatilsynet at this time for your awareness, as speculation about this incident has started to appear on social media and in news media.

- b. Description of how the incident occurred and was discovered.

The investigation is still in progress, but the unauthorized person appears to have gained access to the Gravy Analytics AWS environment through a misappropriated access key. Gravy Analytics became aware of this incident through communication from the unauthorized person.

- c. Describe security measures in place at the time of the incident to protect the affected data.

Gravy Analytics leveraged AWS security-specific tools and features, including network security tools, access controls, and environment monitoring, to secure data stored in the AWS environment.

- d. When did the incident occur? When was it discovered?

Gravy Analytics was informed about the incident on January 4, 2025. Its duration is under investigation.

- e. Details about when the incident ended, steps taken to contain the incident, and the recovery time.

After discovering this incident, Gravy Analytics immediately secured its systems, changed the access keys to its AWS environment, temporarily took its data processing platform offline, and commenced an investigation with assistance from outside cybersecurity experts. As of January 9, 2025, data processing services are operational again. All backfills dating back to January 4, 2025, have been completed. Additional recovery progress is expected in the coming days.

- f. Explanation of the delay in reporting the personal data breach, if any.

Gravy Analytics is currently assessing whether this constitutes a reportable personal data breach and has not delayed its response.

### **3. ABOUT THE AFFECTED PERSONAL DATA AND DATA SUBJECTS**

Gravy Analytics is working diligently to determine the scope of the incident and the nature of the information involved. Preliminary findings indicate that an unauthorized person obtained certain files, which could contain personal data. These are currently being analyzed. If it is determined that personal data is involved, that personal data is likely associated with users of third-party services that supply this data to Gravy Analytics.

### **4. ABOUT ACTIONS TAKEN AFTER THE INCIDENT**

- a. Description of the actions taken (or planned to be taken and the timeline) to prevent a recurrence and to mitigate harm to affected data subjects.

Gravy Analytics will evaluate additional actions to take or measures to implement when the investigation is complete and make appropriate determinations at that time.

- b. Information to the data subjects about the incident.

Gravy Analytics is currently investigating whether personal data was affected by this incident. Should it be determined that personal data was indeed involved, Gravy Analytics will evaluate its obligations to notify individuals and proceed with further necessary actions accordingly.

- c. Information to other organizations, public authorities, and regulators about the incident.

Gravy Analytics is also informing the United Kingdom's Information Commissioner's Office at this time for their awareness.