



Wallboard

Cybersecurity Incident Response Plan

Prepared by: **WALLBOARD**
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PURPOSE

Wallboard is a trusted digital signage software provider of a Content Creation Management System (CMS) and Cloud as a Service (CaaS) platform.

Wallboard stores information related to its Channel Partners, End Users and digital signage business operations, as well as manages and maintains technical infrastructure required to house and maintain this information.

Additionally, **Wallboard** contracts with the Digital Ocean hosting center in the state of New York for the hosting of the primary Wallboard Software Platform for all US-based customers.

This Cyber Security Incident Response Plan outlines the procedures **Wallboard** uses to detect and respond to unauthorized access or disclosure of private information from systems utilized, housed, or maintained by **Wallboard**. To the extent that a Channel Partner maintains a separate multi-tenant server instance of our system, we will not be responsible for the cyber security aspects of such server and therefore this Cyber Security Incident Response Plan does not apply.

More specifically, this plan defines the roles and responsibilities of various staff with respect to the identification, isolation and repair of data security breaches, outlines the timing, direction and general content of communications among affected stakeholders, and defines the different documents that will be required during various steps of the incident response.

Wallboard also implements practices designed to proactively reduce the risk of unauthorized access or disclosure, such as training staff with respect to legal compliance requirements, following appropriate physical security and environmental controls for technical infrastructure, and deploying digital security measures such as firewalls, malware detection and numerous other industry-standard systems.

In the event of a cyber security incident, **Wallboard** staff have been trained to expeditiously deal with the matter.

Wallboard staff are trained upon hire and refreshed on an annual basis to recognize anomalies in the systems they regularly utilize, and to report any such anomalies as soon as possible to the Incident Response Manager so the Incident Response Team can be mobilized. Throughout the year, the Incident Response Manager and members of the Incident Response Team are kept up to date on the latest security threats and trained in modern techniques of incident remediation.

The availability and protection of the information resources managed by the systems we maintain is of paramount importance to our company, Channel Partners and End Users and will always be a core value of our organization.

DEFINITIONS

Cyber Security Incident –

A Cyber Security Incident is any event that threatens the confidentiality, integrity or availability of the information resources we host, support or utilize internally, especially sensitive information whose theft or loss may be harmful to individual End Users, Channel Partners or our company.

Incident Response Team (IRT) –

The IRT is made up of persons in the company whose charge is to navigate the company through a Cyber Security Incident from the initial investigation, to mitigation, to post incident review.

Members include a designated Incident Response Manager, technical hardware and networking employee's, front-end software developers and Wallboard Legal counsel.

Incident Response Manager (IRM)-

The IRM oversees all aspects of the Cyber Security Incident, especially the IRT. The key focuses of the IRM will be to ensure proper implementation of the procedures outlined in the Cyber Security Incident Response Plan, to keep appropriate Incident Logs throughout the incident, and to act as the key liaison between the IRT and the company's management team. At the conclusion of a Cyber Security Incident, the IRM will conduct a review of the incident and produce both an Incident Summary Report and a Process Improvement Plan.

Cyber Security Incident Log –

The Cyber Security Incident Log will capture critical information about a Cyber Security Incident and the organizations response to that incident and should be maintained while the incident is in progress.

Incident Summary Report (ISR) –

The ISR is a document prepared by the IRM at the conclusion of a Cyber Security Incident and will provide a detailed summary of the incident, including how and why it may have occurred, estimated data loss, affected parties, and impacted services. Finally, it will examine the procedures of the Cyber Security Incident Response Plan, including how the IRT followed the procedures and whether updates are required. The template for the ISR may be seen in Appendix A.

Process Improvement Plan (PIP) –

The PIP is a document prepared by the IRM at the conclusion of a Cyber Security Incident and will provide recommendations for avoiding or minimizing the impact of future Cyber Security Incidents based upon the "lessons learned" from the recently completed incident. This plan should be kept confidential for security purposes. The template for the PIP may be viewed in Appendix B.

INCIDENT RESPONSE TEAM

INCIDENT RESPONSE MANAGER

Name: Robert Simon	Title: CO CEO Europe and CTO
Phone:	E Mail: rsimon@wallboard.info

TECHNICAL CONTACTS

Name: John Kesinger	Title: US Platform Manager
Phone:	E Mail: jkesinger@wallboard.info

Name: Zoltan Barics	Title: IT Manager
Phone:	E Mail: zbarics@wallboard.info

LEGAL COUNSEL

Name: Rod Roberson	Title: CO CEO The America's
Phone:	E Mail: rroberson@wallboard.info

COMMUNICATIONS SPECIALIST

Name: Christine Nielsen	Title: Marketing Director
Phone:	E Mail: cnielsen@wallboard.us

INCIDENT MANAGEMENT PRINCIPLES

CONFIDENTIALITY

Investigation

During a Cyber Security Incident investigation, the IRM or members of the IRT will be gathering information from multiple computer systems and/or conducting interviews with key personnel based on the scope of the incident in question. All information gathered or discovered during a Cyber Security Incident will be strictly confidential throughout the investigative process.

All members of the Cyber Security Incident Response Team are trained in information security and data privacy best practices.

Affected Stakeholders

In the event the incident involves the unauthorized access or disclosure of confidential information of a Channel Partner or End User, **WALLBOARD** will communicate information relevant to the incident as well as any additional requested information to which they have a right (e.g. specific end user records, artifacts, etc.) as soon as possible.

WALLBOARD does reserve the right to withhold certain information at the discretion of the IRM if that information may jeopardize current or future investigations or pose a security risk to **WALLBOARD** or other entities.

In the event the incident involves information of an non-**WALLBOARD** stakeholder group, such as a vendor partner, **WALLBOARD** will take appropriate steps to notify those entities as efficiently as possible.

In the event the incident is limited to **WALLBOARD** systems not containing sensitive or confidential information, it will be the discretion of **WALLBOARD** administration and the IRM whether or not to share information related to the incident with outside stakeholders.

Report Management

All reports generated during an investigation along with any evidence gathered will be stored and managed by the IRM. Any physical records will be stored in the IRM's office in a locked file. Any digital records will be stored on the internal network in a network share only accessible by the IRM and approved Administrators. That share will be backed up and stored in accordance with **WALLBOARD** regular backup procedures.

In the event past records of incidents need to be reviewed, a written request must be made to the IRM that includes the requestor, the information requested and the reason for the request. The IRM will review the request and has the discretion to approve or deny any request. Incident summary information will always be made available by the IRM.

COMMUNICATION GUIDELINES

Communication with End Users and/or Channel Partners, will be disseminated via the Wallboard Executive Management team or designee.

- Initial communication to affected stakeholders should occur as expeditiously as possible upon the identification of the incident. In some cases, this may include an initial communication (letter, email, phone call) that simply states that Wallboard is aware of the issue and is addressing it, with the promise of a follow up.

Scenarios for the release of Personally Identifiable Information (PII) are as follows:

- Should the unauthorized release of customer data occur, Wallboard shall notify the partner and the customer point of contact affected by the release in the most expedient way possible. This notification is to occur within 14 calendar days after the breach
- Updated communications will come from the Incident Response Manager. As staff receive requests for information, they should pass those requests along to the Incident Response Manager.
- Wallboard staff should be clearly informed by the Management Team what information is public and what is internal/confidential. However, company leadership should be aware that any material or information communicated to staff can be shared with the public, including the news media.
- Communication with news media will be initiated by the Legal Counsel and/or designee. Incoming news media calls and requests for information will be directed through the Incident Response Team Communication Specialist. A communication response plan (talking points, interview refusal statement, etc.) will be formulated as needed, with information coming from the CO CEO's, Legal Counsel or designee.

CYBER SECURITY INCIDENT PHASES

IDENTIFY

Overview

All **Wallboard** staff have a responsibility to remain vigilant and protect the data stored within the systems we maintain. Any event that threatens the confidentiality, integrity or availability of the information resources we maintain or utilize internally should immediately be reported to a supervisor or the IRM if a supervisor is unavailable. Supervisors should immediately bring the incident to the attention of the IRM.

Incident Types

Types of cyber incidents that may threaten the organization are:

- Unauthorized attempts to gain access to a computer, system or the data within
- Service disruption, including Denial of Service (DoS) attack
- Unauthorized access to critical infrastructure such as servers, routers, firewalls, etc.
- Virus or worm infection, spyware, or other types of malware
- Non-compliance with security or privacy protocols
- Data theft, corruption or unauthorized distribution

Incident Symptoms

Signs a computer may have been compromised include:

- Abnormal response time or non-responsiveness
- Unexplained lockouts, content or activity
- Locally hosted websites won't open or display inappropriate content or unauthorized changes
- Unexpected programs running
- Lack of disk space or memory
- Increased frequency of system crashes
- Settings changes
- Data appears missing or changed
- Unusual behavior or activity by **Wallboard** staff, End Users, Channel Partners or other actors

ASSESS

Overview

Once anomalous activity has been reported, it is incumbent upon the IRM to determine the level of intervention required. Other members of the IRT may be required to provide input during this phase to help determine if an actual security threat exists. If it is determined there is an active security threat or evidence of an earlier intrusion, the IRM will alert the entire IRT immediately so that the situation may be dealt with as expeditiously as possible.

Considerations

- What are the symptoms?
- What may be the cause?
- What systems have been / are being / will be impacted?
- How widespread is it?
- Which stakeholders are affected?

Documentation

Regardless of whether it is determined there is a security threat, the IRM will accurately document the scenario in a Cyber Security Incident Log. All Cyber Security Incident Logs will be stored in a single location so incident information may be reviewed in the future. This report should contain information such as:

- Who reported the incident?
- Characteristics of the activity
- Date and time that the potential incident was detected
- Nature of the incident (Unauthorized access, DDoS, Malicious Code, No Incident Occurred, etc.)
- Potential scope of impact
- Whether the IRT is required to perform incident remediation?

RESPOND

Briefing of Executive Leadership

Upon determining that a significant incident or breach has occurred, Executive Leadership should be notified immediately. As additional information is uncovered throughout the investigation, Leadership should be briefed by the IRM so appropriate decisions, such as allocating additional staff, hiring outside consultants and involving law enforcement can be made. Additionally, based on the incident, it will be incumbent on Leadership to determine the appropriate stakeholders to notify of the incident and the appropriate medium to do so.

Administration should take into consideration the nature of the information or systems involved, the scope of the parties affected, timeliness, potential law enforcement interests, applicable laws and the communication requirements of all parties involved. Sample communications documents may be found in Appendices C - F.

Initial Response

This first steps in any cyber incident response should be to determine the origin of the incident and isolate the issue. This may involve measures up to and including immediately disconnecting particular workstations, servers or network devices from the network to prevent additional loss. While this is occurring, it is necessary to examine firewall and system logs, as well as possibly perform vulnerability scans, to ensure the incident has not spread to other areas in order to define the entire scope of the incident.

Throughout this process, it will be critical to preserve all possible evidence and document all measures taken in detail. Thorough review and reporting on the incident will be required once the threat has been removed, the vulnerabilities have been removed and the systems have been restored.

Remediation and Recovery

Once the cause has been determined and appropriately isolated, the IRT will need to remove the vulnerabilities leading to the incident. This may involve some or all of the following:

- Install patches and updates on systems, routers, and firewalls
- Infections cleaned and removed
- Re-image or re-install operating systems of infected machines
- Change appropriate passwords
- Conduct a vulnerability scan of any compromised machines before reconnecting them to the network
- Restore system backups where possible
- Document all recovery procedures performed and submit them to the IRM
- Closely monitor the systems once reconnected to the network

REPORT

Overview

Once the threat has been mitigated and normal operation is restored, the IRM will compile all available information to produce an accurate and in-depth summary of the incident in an Incident Summary Report (ISR). A copy of the ISR is located in Appendix A. Throughout the incident, the IRT will have kept Incident Logs that contain detailed records wherever possible, and these shall serve as the basis of the report. Interviews will also be conducted with appropriate members of the IRT to obtain any additional information that may be available to augment the logs and records kept throughout the process.

The company will maintain a record of all complaints of breaches or unauthorized releases of data and their disposition in accordance with applicable data retention policies using the log in Appendix H.

Report Contents

The Incident Summary Report (ISR) will include all pertinent information to the incident, but at minimum:

- Dates and times of milestones throughout the process (e.g. incident detection, verification, notifications, remediation steps, completion, etc.)
- List of symptoms or events leading to discovery of the incident
- Scope of impact
- Mitigation and preventative measures
- Restoration logs
- Stakeholder communications (including copies of memos, emails, etc. where possible)

Timeframe

The ISR should be prepared as expeditiously as possible following the incident so future preventative measures may be taken as quickly as possible. Information to prepare the ISR and interviews with the IRT should be conducted immediately to ensure the greatest possible accuracy of information.

REVIEW

Post-Incident Review Meeting

After the conclusion of the incident, the IRM and possibly select members from the IRT will meet with management to discuss the event in detail, review response procedures and construct a Process Improvement Plan (PIP) to prevent a reoccurrence of that or similar incidents. The compiled Incident Report constructed by the IRM will serve as a guide for this meeting.

In the meeting, a full debrief of the incident will be presented and findings discussed. The IRM will share the full scope of the breach (as comprehensively as possible), causes of the breach, how it was discovered, potential vulnerabilities that still exist, communication gaps, technical and procedural recommendations, and the overall effectiveness of the response plan.

As a whole, the group will review the information presented and will determine any weakness in the process and determine all the appropriate actions moving forward to modify the plan, address any vulnerabilities and what communication is required to various stakeholders.

Process Improvement Plan

The IRM will draft a Process Improvement Plan (PIP) based on the results of this meeting. The plan should discuss any applicable items necessary to, prevent future incidents to the extent practicable, including cost and time frame requirements where possible. The PIP will also include a review strategy to ensure all recommendations made in the PIP are met in a timely fashion and functioning appropriately.

Areas of focus may include, but are not limited to:

- New hardware or software required
- Patch or upgrade plans
- Training plans (Technical, end users, etc.)
- Policy or procedural change recommendations
- Recommendations for changes to the Incident Response Plan
- Communications recommendations

Additionally, the PIP must be kept strictly confidential for security purposes. Any communication required to clients or to the public must be drafted separately and include only information required to prevent future incidents.

APPENDIX A: INCIDENT SUMMARY REPORT

INCIDENT SUMMARY

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Type of Incident	
Date Incident Originated	
Date Incident Was Detected	
By Whom Was Incident Detected	
How Was Incident Detected	
Scope of Incident (Districts / Systems Affected)	
Date Incident Corrected	
Corrective Action Types (Training, Technical, etc)	

Summary of Incident Symptoms

Summary of Incident Type and Scope

Summary of Corrective Actions

Summary of Mitigation Processes and Internal Communication

Communications Log (Attach drafts for written communications, synopsis for verbal communication)

Communication Date	Communication Type	Recipient(s)	Purpose

APPENDIX B: PROCESS IMPROVEMENT PLAN

PROCESS IMPROVEMENT PLAN

Areas of Success Summary

Areas in Need of Improvement Summary

Recommended Improvements to Avoid Future Incidents

Recommended Improvements to the Cyber Security Incident Response Plan

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Improvement Timeframe Cost	Improvement Timeframe Cost	Improvement Timeframe Cost

APPENDIX C: INCIDENT LOG

INCIDENT LOG

Incident Title

Incident Opened Date

Incident Description

Action / Event	Date / Time	Performed / Reported by	Details

APPENDIX D: SAMPLE LETTER

DATE

Dear Valued Customer/Partner,

This letter is to inform you of an incident that occurred within the **Wallboard cloud system**. This incident resulted in customer/partner/staff/etc data being compromised by an outside entity. Our Incident Response Team acted quickly to assess and mitigate the situation.

At this time, we are able to share the following details:

[insert a brief description of the breach or unauthorized release, the dates of the incident and the date of discovery; a description of the types of personally identifiable information affected; an estimate of the number of records affected; a brief description of the company's investigation or plan to investigation.]

Please know that **Wallboard** is committed to protecting and securing your digital signage content and data. Our team has extensive training in data security and privacy, and our systems have many controls in place to protect your data, records, and artifacts.

Our team is working with a group of experts to review the incident and implement appropriate measures to protect against this type of incident from occurring in the future.

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Please contact **Wallboard** with any questions you may have regarding this incident and our response.

Sincerely,

APPENDIX E: SAMPLE STAFF MEMO

DATE

Dear Staff,

This letter is to inform you of an incident that occurred on **DATE** within Wallboard's **CMS/Hosted** system. This incident resulted in **end user/partner/staff/etc** data being compromised by an outside entity. Our **response** team acted quickly to assess and mitigate the situation.

I wanted to ensure that you have key details of the incident so you are well-informed when speaking with your partners and colleagues. Please note that **Wallboard leadership** is handling communication with the affected parties.

Should you receive any related inquiries, please direct them to **Rod Roberson, Co-CEO of Wallboard**.

At this time, we are able to share the following details:

[insert a brief description of the breach or unauthorized release, the dates of the incident and the date of discovery; a description of the types of personally identifiable information affected; an estimate of the number of records affected; a brief description of the educational agency's investigation or plan to investigate]

As more details become available, they will be disseminated as appropriate. Please contact **your Supervisor or Rod Roberson** should you have any questions or immediate concerns regarding this incident.

Sincerely,

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