



## Katherine Doty Hanniford

Partner

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### *Related Services*

Crisis & Data Breach Response ■ Privacy, Cyber & Data Strategy ■ Litigation ■ Cybersecurity & Risk Management ■ HIPAA/Health Information Privacy, Security & Breach Response ■ National Security & Digital Crimes ■ Privacy & Cyber Regulatory Enforcement ■ Privacy & Cybersecurity Litigation ■ California Privacy & the CCPA ■ Emerging Technologies & Innovation

Kate Hanniford is a partner on Alston & Bird's Technology and Privacy, Cyber & Data Strategy teams. She focuses her practice on cybersecurity and privacy compliance and enforcement. Kate has provided advice on a range of cybersecurity topics, including compliance with various cybersecurity standards, managing cyber risk at all levels of the enterprise, cybersecurity governance, and responding appropriately to security incidents. She also actively monitors cybersecurity-related legislative and regulatory developments at the state and federal levels to provide advice on potential impacts. Kate advises clients on privacy and security issues along the data life cycle including implementing enterprise-wide privacy and security policies, compliance strategies, privacy and security issues in complex transactions, and privacy regulatory enforcement.

Kate also assists securities-industry clients with compliance with SEC and FINRA rules and standards, including SEC (OCIE) examination preparation and enforcement matters as well as Reg SCI and cybersecurity preparedness. She is well-versed in the scale and complexity of incident response in highly regulated industries, having handled incident response for public issuer, broker-dealer, and investment adviser data security and privacy incidents as well as some of the largest health care breaches in recent years. *The Best Lawyers in America*<sup>®</sup> regularly recognizes Kate on its "Ones to Watch" list in the areas of Technology Law and Privacy and Data Security Law. Kate is a Certified Information Privacy Professional.

### *Representative Experience*

#### **Cybersecurity**

- Advised multiple Fortune 500 and 1000 companies during complex, privileged computer crime investigations requiring a crisis response and legal analysis under state, federal, and international laws. Specific engagements included multinational data breaches, cyber-enabled fraud, business email compromise, and ransomware.
- Advised multiple SEC-registered investment advisers, broker-dealers, and public companies on their cybersecurity policies and procedures, including their incident response plans. Conducted tabletop exercises of clients' incident response plans.
- Represented multiple health care clients involved in ransomware attacks, requiring complex forensic investigation and extensive data review and restoration processes, as well as in follow-on regulatory inquiries.
- Provided ongoing analysis and advice to a global logistics and supply chain management company on privacy and security incident response.
- Assisted health care plans and insurance companies in their incident response efforts and follow-on federal and state regulatory investigations.

- Advised an insurance broker and risk management firm with multiple affiliates and covered entities in the development and implementation of its cybersecurity program in compliance with the New York Department of Financial Services cybersecurity requirements.
- Advised a major retailer in developing a comprehensive information security program for all levels of the enterprise.
- Advised a systemically important financial market utility on a range of corporate governance, regulatory compliance, and examination matters.
- Advised a broker-dealer and electronic trading platform's crisis management and response team as lead outside counsel.

## **Privacy**

- Advised a Fortune 500 public company in the design and implementation of updated data governance policies and procedures, with particular focus on data retention and secure disposal.
- Advised multiple banking and financial institutions regarding privacy policy compliance under the Gramm-Leach-Bliley Act, other federal standards, and state law.
- Serving as primary outside privacy counsel to a Fortune 500, publicly-listed insurance company, including for federal and state law privacy compliance, the application of AI and machine learning capabilities, and related consumer protection issues.
- Advised a global multinational transportation infrastructure company on compliance with U.S. privacy law and harmonization with GDPR compliance.
- Advising a global biotechnology company on U.S. privacy matters.

## **Publications & Presentations**

### **Publications**

- "10 Ransomware Issues GCs Should Have On Their Radar," *Law360*, April 1, 2024.
- "FTC Revises the Safeguards Rule and Proposes Mandatory Reporting of Cybersecurity Events," *Westlaw Today*, November 15, 2021.
- "Top 7 Issues All General Counsel Need to Know About Ransomware," *The Computer & Internet Lawyer*, Vol. 38, No. 9, October 2021.
- "Managing a Cyber Crisis: 7 Practical Tips to Recover with Strength," *Cybersecurity Law & Strategy*, March 4, 2021.
- "Insight: SEC Expects Key Safety Steps for Remote Workforce," *Bloomberg Law*, September 14, 2020.
- "Tips for Broker-Dealers to Avoid Scams during COVID-19," *Law360*, June 10, 2020.
- "As Pandemic Triggers Continuity Plans, What RIAs and BDs Should Ask Themselves," *Financial Planning*, April 13, 2020.
- "Insight: SEC 2020 Compliance, Examination Priorities Aim at IT Security, FinTech Industry," *Bloomberg Law*, February 7, 2020.
- "Calif. Privacy Law Compliance Strategy for In-House Counsel," *Law360*, December 19, 2019.
- "FINRA Exams Show Greater Cybersecurity, Comms Focus," *Law360*, November 7, 2019.
- "INSIGHT: Your Data in the Hands of a 'Fourth Party': Cybersecurity Considerations in Discovery," *Bloomberg Law*, September 21, 2018.

- *The SEC, DOJ, and Investment Advisers: The Examination and Enforcement Regime*, Securities Practice Portfolio Series No. 283, Bloomberg BNA, 2014–2017.
- *The Financial Reporting Handbook*, editorial staff, Aspen, 2017–2018.
- “Presidential Commission on Enhancing National Cybersecurity Has Issued Recommendations and Action Items for Securing the Digital Economy,” *Pratt’s Privacy & Cybersecurity Law Report*, Vol. 3, No. 2, February/March 2017.
- “U.S. Supreme Court Unanimously Affirms *Dirks v. SEC*, Long-Standing Analysis of ‘Personal Benefit’ for Purposes of Insider Trading Liability,” *Investment Lawyer*, February 2017.

## **Presentations**

- “Life After Lock Up: After your Data is Taken and Your Systems Encrypted,” Privacy + Security Forum: Spring Academy, Washington, D.C., May 8, 2024.
- “Ransomware Attack Best Practices,” Incident Response Forum Masterclass 2024, webinar, April 18, 2024.
- 2024 Privacy & Technology Law Forum, State Bar of Georgia, Atlanta, GA, March 5–6, 2024.
- Privacy + Security Forum 2023, Fall Academy, Privacy + Security Academy, Washington, D.C., November 8–11, 2023 .
- “Data Disposal: You Really Can Hit Delete,” Privacy + Security Forum 2023, Washington, D.C., May 10-12, 2023.
- “Cybersecurity, Privacy and Data Protection Ethics Issues in Private Equity,” PLI’s 24th Annual Private Equity Forum, New York, NY, April 27-28, 2023.
- “Ransomware Attack Response: Best Practices,” Incident Response Forum Masterclass 2023, webinar, April 20, 2023.
- “Do We Pay the Ransom,” Levick, podcast, June 21, 2021.
- “Mandates Beyond the Advisers Act: Data Protection: Privacy, Identity Theft and Cybersecurity,” National Regulatory Services and Investment Adviser Association, webinar, April 8, 2021.
- “Data Protection: Privacy, Identity Theft, and Cybersecurity,” Investment Adviser Association, webinar, April 9, 2020.
- “Preparing, Responding, and Recovering from a Cyber Incident: Tools and Techniques,” Knowledge Group, webinar, March 3, 2020.

## **Professional & Community Engagement**

- Certified Information Privacy Professional (CIPP-US)
- Artificial Intelligence Governance Professional (AIGP)

## **Education**

- University of Texas (J.D., 2009)
- Swarthmore College (B.A., 2000)

## **Admitted to Practice**

- New York
- District of Columbia