



JOSH STEIN  
ATTORNEY GENERAL

STATE OF NORTH CAROLINA  
DEPARTMENT OF JUSTICE  
9001 MAIL SERVICE CENTER  
RALEIGH, NORTH CAROLINA 27699-9001  
WWW.NCDOJ.GOV

CONSUMER PROTECTION  
TOLL-FREE IN NC: 877.566.7226  
OUTSIDE OF NC: 919.716.6000  
FAX: 919.716.6050

October 11, 2018

Sundar Pichai, CEO  
Google LLC  
1600 Amphitheatre Parkway  
Mountain View, CA 94043

Re: Google+ security breach

Dear Mr. Pichai:

The North Carolina Attorney General's Office is concerned about the security breach Google announced this week regarding the Google+ social network. This incident is disturbing given that information of consumers was disclosed, but also because of Google's response, or lack thereof, to the breach. This breach raises significant questions about Google's security, as well as security monitoring and threat detection across the Google network.

Certain pertinent facts are still unclear, including the types of information involved, whether impacted consumers have been provided direct notice that their data could have been obtained by a third party, and what remedial steps Google has taken in response to this incident to ensure similar breaches do not occur in other parts of the Google network. Accordingly, we are requesting that you provide answers to the following questions:

1. Please describe all categories of information included in the Google+ profiles that were exposed. This response should include, without limitation, an identification of all fields or properties that were exposed, along with:
  - Whether user data entry in the field was optional or mandatory;
  - What percentage of Google+ users placed information in the field;
  - Whether the field worked differently for G Suite users or other enterprise users than for general consumers;
  - Whether information was placed in that field solely by the user or, instead, by Google; and
  - The source of any information that Google placed in that field.
2. Please indicate the number of North Carolina consumers impacted by the Google+ breach.

3. Please indicate any businesses or enterprise organizations doing business in North Carolina with G Suite consumers who were impacted by the Google+ breach.
4. Please describe the facts and circumstances of the incident, including how and when Google learned of it, any vulnerability that was exploited, and Google's efforts to investigate and mitigate thereafter. In your response, please include a timeline indicating the progression of said events.
5. Please explain why there was a delay in making the facts of this incident public.
6. Please provide copies of all privacy policies and other such disclosures or representations regarding Google's collection, storage, retention, and sharing of user profile information.
7. Please provide copies of all policies, guidelines, or regulations Google has for auditing the security of all applications across the Google network.
8. Please provide any plan, policies, procedures, and/or protections that Google currently has in place, or is developing, to prevent the recurrence of such a breach and a timeline for implementing any such plans, policies, procedures or protections.
9. Please indicate whether Google has provided direct notification to the affected North Carolina residents, and if so, the date(s) on which notification was sent. In your response, please provide a copy of any exemplar notifications and/or media postings made by Google.
10. Please describe the steps Google has taken to protect the North Carolina residents' profiles affected by this incident and/or mitigate any harm to such residents.
11. Please indicate what law enforcement agencies have been contacted or are investigating this matter.
12. Please provide copies of all privacy assessments and reports prepared by or for Google since January 2017.
13. Please provide copies of all Project Strobe assessments or reports.
14. Please indicate whether Google has coordinated with other applications, and indicate which applications, to restrict the use of Google+ log in information allowing access to third party applications.
15. If North Carolina residents were automatically enrolled in Google+ through signing up for another Google service or through a resident's business or enterprise organization, please describe the process by which those persons gave consent, and provide copies of any approval notices provided to those residents.

Please provide the requested information no later than October 24, 2018.

Thank you for your attention to this matter. We look forward to your responses to these questions.

If you have any questions, feel free to contact me directly at 919-716-6013 or [kdarruda@ncdoj.gov](mailto:kdarruda@ncdoj.gov).



Kimberley A. D'Arruda  
Special Deputy Attorney General

