

# EXHIBIT 10



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FILE NO: 74395.000003

December 3, 2010

CONFIDENTIAL TREATMENT REQUESTED  
SUBJECT TO ATTORNEY WORK PRODUCT NON-WAIVER AGREEMENT

VIA EMAIL

Mr. Alain Sheer  
Division of Privacy and Identity Protection  
Bureau of Consumer Protection  
Federal Trade Commission Division  
Mail Stop NJ-3137  
600 Pennsylvania Ave  
Washington, D.C. 20580

Re: Hannaford Bros. Co.

Dear Alain:

At the meet and confer held on November 16, 2010, we discussed providing an outline of the process by which Hannaford Bros Co. (the "Company") preserved and produced information potentially responsive to the requests made in the FTC's Voluntary Access letters.

**Background & Preservation**

On February 27, 2008, Hannaford learned for the first time of the unauthorized intrusion into its network system. The Company made public facts regarding the intrusion on March 17, 2008. The FTC Staff sent its first Voluntary Access letter on March 21, 2008. Also on March 21, 2008, the Hannaford Legal Department issued the first legal hold directive to 121 employees (the "First Hold"). While the precise contents of that communication are privileged, factually the legal hold contained a direction to preserve documents related to the intrusion. The recipients of the legal hold included members of Hannaford's senior leadership and employees in departments that the Company's General Counsel's office believed may have information and documents related to the intrusion, erring on the side of over-inclusion. The General Counsel's office sent a second document to the same employees more fully describing the documents and information to be retained under the legal hold on April 9, 2008 (the "Second Hold"). A list of the 121 employees who received the First and Second Hold Notices is attached at Exhibit A.



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The Company's Legal Department and the Company's outside counsel thereafter developed a process to have the paper and electronic documents collected from the officers and employees who indicated they possessed relevant information. Documents were not collected from legal hold recipients who indicated that they did not possess relevant documents. Altogether, documents were collected from 88 Hannaford employees. The list of employees from whom documents were collected is attached as Exhibit B. In addition to this custodian-based collection process, the in-house lawyers and outside legal team identified two shared network areas as potentially possessing information related to the breach and collected those shared drives. Finally, certain EnVision server log files were also collected.

In total, the volume of raw data collected and preserved from custodians or from the network shared drive totaled approximately 175 GB of compressed data. The Envision server log files comprised an additional 6.75 GB. The above information does not include approximately 7.1 Terabytes of forensic images that were taken during the initial investigation of the Hannaford intrusion. A catalogue of forensic images associated with that investigation is attached as Exhibit C.

#### **Responses to Voluntary Access Letters**

Given the expense of processing and reviewing the entire collection of material, much of which would be duplicative of data held by other custodians or not responsive to the Voluntary Access Letter requests, the Company and its counsel designed a methodology to narrow the set of data to be processed and reviewed. While we set forth the process in detail below, at a high level it included a review of organizational charts and job positions at the Company, as well as privileged interviews and discussions with in-house counsel. Based upon this process, the Company selected a number of "key custodians" for initial review to develop an understanding of appropriate methods to engage in a reasonable yet comprehensive review process. After review of this initial group of documents, and as further information came to light regarding those who likely possessed information relevant to the response, additional custodians were selected for processing to the extent a reasonable belief was formed that those additional custodians possessed unique data potentially responsive to the inquiries in the Voluntary Access Letters.

The specifics of the data processing and review process are as follows:

1. There was an initial group of seven priority custodians selected for review: Bryan Croteau (Treasury and Finance), Carol Eleazer (VP Marketing), David Goren (Team
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Leader, Retail Systems), Neal Gregoire (Treasury and Finance), Kevin Nolan (Loss Prevention), Doug Roberts (Manager of System Services), and Tom Witwicki (Director of Information Security).

2. Once a custodian was selected for processing, the data for that custodian was sent to a vendor, Servient, for processing and hosting in an online review application. To the extent that a custodian possessed paper documents, the custodian's entire paper collection was scanned into a Summation paper database.
3. Servient then processed the data, engaging in global de-duplication, and excluding non-relevant types of file extensions, such as system files and image/audio/video files, as well as html files. The processing yielded more than 160,000 unique documents and emails for the first seven custodians.
4. The Company and its counsel then designed an iterative keyword methodology process, the purpose of which was to identify documents responsive to the inquiries presented in the initial Voluntary Access Letter. This process had the following characteristics:
  - a. As noted above, all unique data, regardless of whether it hit on a keyword, was processed for this initial group of custodians.
  - b. An initial set of keywords was developed to apply against the custodians' data using the issues and categories sought by the Voluntary Access Letters. Using search terms derived from a document like the initial Voluntary Access Letter as the foundation to formulate an initial set of search terms as part of an iterative search methodology has been proposed by the leader in this field to increase search effectiveness. See *D. C. Blair, Wittgenstein, Language and Information* (Springer 2006) at 353-354.
  - c. To test the efficacy of that initial keyword list, Servient was directed to present for attorney review *all* documents for two of the initial seven custodians, Messrs Nolan and Goren. Attorneys reviewed *all* the documents, reviewing and coding for relevance regardless of whether the document hit on a keyword.
  - d. The results of the review indicated that the keywords captured most of the relevant documents, in that very few documents marked responsive were from the non-keyword hit document set. In technical search parlance, the broad

keywords resulted in a high rate of "Recall," *i.e.* the overall percentage of relevant documents that were also identified by the keywords was quite high.

- e. Given the high Recall rate on its keyword list, this same keyword list was run through the electronic data for the remaining five custodians: Bryan Croteau (Treasury and Finance), Carol Eleazer (VP Marketing), Neal Gregoire (Treasury and Finance), Doug Roberts (Manager of System Services), and Tom Witwicki (Director of Information Security). The attorneys reviewed the keyword-hit documents for these remaining five loaded custodians.
- f. After the first production of documents on May 16, 2008, counsel then conducted an additional audit of the documents for the five custodians identified above who had not had all of their documents reviewed to once again check the efficacy of the review process and to determine if any additional keywords would have yielded additional responsive documents. A random sample of 6,000 documents that had not previously been hit by the initial list of keywords was selected and split by custodian. Attorneys were instructed to review the documents to look for key terms to search the remainder of the documents and to mark any documents they found to be responsive. Seventy-five of 6,000 documents were determined to be responsive. From these responsive 75 documents, the attorneys generated a list of 23 additional terms to test. Each term was tested and reviewed against the previously unreviewed documents for all five custodians.
- g. Another four successive rounds of auditing were conducted, generally following this protocol. From that auditing process, a final keyword list was generated, keeping the keywords that yielded responsive documents and eliminating the words that did not yield any responsive documents in the audit. All previously unreviewed documents were run against this final list and reviewed. The "Final Keyword List" is attached as Exhibit D.
- h. Based in part on an analysis of the reviewed documents and continued diligence, documents from the following five additional custodians were processed and reviewed using the same instructions: Kevin Carleton (Director of Retail Technology), Bill Homa (Senior VP and CIO), Chris Lewis (VP of Information Technology, Infrastructure & Operations), Bill Malloy (Manager of Information Technology Planning & Financial Management) and Ed Taggart (Manager of Network & Communication Services). The processing resulted in

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approximately 86,000 total documents loaded to the database, which was then culled down by using the Final Keyword List.

- i. Between August and November 2008, the Company identified eight additional custodians for review, again based upon their job and role in the response to the breach. This list of custodians included: Don Allen (IT - Retail Systems Analyst), Eric Cliff (IT - Retail Systems Analyst), Daniel Fasulo (IT - Information Security Analyst), Patricia Gilbert (IT - Service Management), Joe Gwozdz (IT - Manager Web Technology Development), Greg Amoroso (Sr. VP & CFO), Jeff Lemmo (Sr. IT Auditor), and Beth Newlands-Campbell (Sr. VP Business Strategy & Retail Operations). The collected electronic documents for these custodians were again provided to Servient, and processed with global deduplication and the Final Keyword List.
  - j. The attorneys also reviewed and produced documents from the two network shared drives, following the same processing instructions and application of the Final Keyword List as the custodian data.
  - k. In addition to the electronic documents for this group, there were 7,078 documents comprising 70,879 pages loaded to the Summation paper database for review. This included all paper documents collected from the above identified custodians. All of these documents were reviewed without any keyword filter applied.
  - l. Altogether, 45 of the 175 GB of compressed collected data was sent to Servient for processing and review. After decompression, file type filtering, deduplication and processing, 120 GB of uncompressed data was loaded into Servient's database for review.
  - m. All the review was conducted by associates at Pierce Atwood, a law firm in Maine that has a longstanding relationship with the Company. Contract attorneys were not used for this review. All reviewers were trained and supervised by a senior associate very familiar with the issues related to this matter.
  - n. Altogether, electronic and paper documents were loaded and produced for twenty custodians and two shared drives, and, based on responsiveness and privilege, 1,856 paper documents and 14,286 electronic documents were
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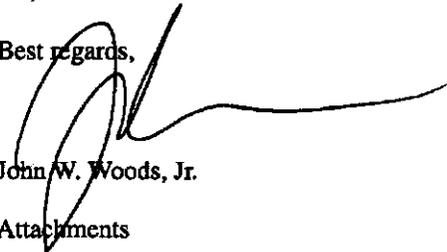
produced. This comprises the over 130,000 pages of material produced to the FTC Staff.

As we indicated in our correspondence to you throughout the Fall of this year, the foregoing method of preserving, collecting, processing, development of a rigorous keyword methodology, reviewing, re-reviewing for accuracy, and then producing documents not only was more than sufficient to provide the FTC with a complete picture of the state of Hannaford's security and its efforts to remediate the network intrusion, but also exemplifies the rigor and good faith with which Hannaford has conducted itself in the FTC's investigation and with the U.S. Government generally. To the extent you have concerns regarding the process or would like to collaborate on a going forward process to respond to your recently issued CIDs, we welcome the dialogue.

Finally, given the offer set forth in what you refer to as the "Voluntary Access CID," to the extent that the Commission agrees that the process outlined above would constitute a "complete and accurate" production, my client is prepared to sign a certification that the above process was undertaken and followed in responding to the Voluntary Access Letters, and that it in good faith believes that a response pursuant to this protocol is "complete and accurate." As stated in your October 29, 2010, letter, that would eliminate the need for Hannaford to provide further responses to the Second Hannaford CID.

If you need any further elaboration or want to discuss these issues further, please call me, Mike Oakes or Neil Gilman.

Best regards,



John W. Woods, Jr.

Attachments

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## Exhibit A - List of March 2008 Legal Hold Recipients

Ahluwalia, Anant	Gamache, Trevor	Merriam, Aaron
Aleshire, Art	Giacomini, Gina	Meyerkopf, Rick
Allen, Donald	Gilbert, Patricia	Michaud, Mike
Almasi, Laura	Goren, David	Miller, Lisa
Amoroso, Gregory	Gorman, Mike	Moore, Michael
Anderson, Annette	Goulet (Lambert), Cheryl	Nance, Millard
Antonowicz, Robyn	Green O'Brien, Lisa	Natale, Mary
Atheam, Wendy	Greenleaf, Gerry	Newlands-Campbell, Beth
Ayoob, Rick	Gregoire, Neal	Nolan, Kevin
Bass, Dave	Guay, Brian	Norton, Michael
Beaulieu, Cindy	Gwozdz, Joe	Odden, Steve
Benson, Dave	Hamilton, Lori	Ouellette, Gary
Beyeler, Peter	Hamlyn, Robert	Paquette, Heather
Blackmore, Eric	Hanson, Andrew	Paro, Ron
Broader, Shelley	Hanson, Kristen	Pepin, Tod
Burrill, Scott	Harriman, Mark	Perkins, Tom
Calden, Ken	Harris, Mike	Ramseyer, Rick
Cardinal, Alan	Hill, Kevin	Reardon, David
Carteton, Kevin	Hodge, Ron	Roberts, Doug
Chang, Joon	Holmes, Janet	Sabattus, Paul
Clement, Peter	Homa, Bill	Schools, Bob
Cliff, Eric	Hopkins, Tom	Shain, Melinda
Collins, Scott	Hoskins, James	Silva, Henry
Colston, Penny	Jones, Katie	Smith, Steve
Croteau, Bryan	Kacer, Jim	Stanhope, Karen
Culver, Steve	Kallis, Mike	Stevens, Sherri
Curtis, Carolyn	Kenney, Richard	Taggart, Edward C
Davis, William	Landsperg, Tony	Thorpe Hays, Michelle
Deegan, John	Laverriere, Eric	Tirrell, Brett
DeJohn, James	Lebeau Gavin, Nicole	Tobin, John
Delmonte, Terry	Lemmo, Jeffrey	Turner, John
Denis, Reginald	Levinson, Mike	Vail, Mike
Dickinson, Emily	Lewis, Chris	Viekman, Timothy
Doiron, Mark	L'Heureaux, Bob	Washburn, Bill
Eleazer, Carol	Lucarelli, Gregory	Webster, Lisa
Ellis, Rich	Malloy, William	White, Jack
Epstein, Caren	Mank, Karen	Wise, Brad
Fasulo, Daniel	Markos, Christopher	Witas, Earl
Fasulo, Terri	Mayo, Andy	Witwicki, Tom
Favreau, Dave	McFarland, John	
Fernald, Karen	McGowan, Debra	

**Exhibit B - List of Custodians Collected in 2008**

Aleshire, Art	yes	no	
Allen, Donald	yes	yes	efiles and email
Almasi, Laura	yes	no	
Amoroso, Gregory	yes	yes	email
Anderson, Annette	yes	no	
Antonowicz, Robyn	no	yes	email
Arato, Ben	no	yes	efiles and email
Ayoob, Rick	yes	yes	email
Bass, Dave	yes	no	
Beaulieu, Cindy	no	yes	email
Benson, Dave	yes	no	
Blackmore, Eric	yes	no	
Burrill, Scott	yes	no	
Carleton, Kevin	yes	yes	email
Chang, Joon	yes	no	
Clement, Peter	no	yes	efiles and email
Cliff, Eric	no	yes	email
Croteau, Bryan	yes	yes	efiles and email
Culver, Steve	yes	no	
Curtis, Carolyn	no	yes	email
Davis, William	yes	no	
Deegan, John	yes	no	
Delmonte, Terry	yes	no	
Dickinson, Emily	no	yes	email
Doiron, Mark	yes	no	
Eleazer, Carol	yes	yes	specified areas of email
Ellis, Rich	yes	no	
Epstein, Caren	no	yes	entire mailbox
Fasulo, Daniel	yes	yes	efiles and email
Fernald, Karen	yes	no	
Fournier, Dave	no	yes	entire mailbox
Giacomini, Gina	yes	no	
Gilbert, Patricia	yes	yes	specified areas of email
Goren, David	yes	yes	specified areas of email
Goulet (Lambert), Cheryl	yes	yes	email
Green O'Brien, Lisa	no	yes	email
Gregoire, Neal	yes	yes	email
Guay, Brian	yes	no	
Gwozdz, Joe	yes	yes	email
Hamllyn, Robert	yes	no	
Hanson, Andrew	no	yes	email
Hanson, Kristen	yes	yes	email
Harriman, Mark	no	yes	email
Harris, Mike	yes	no	
Hill, Kevin	yes	no	
Hodge, Ron	yes	yes	email
Homa, Bill	no	yes	email

Jones, Katie	yes	no	
Kallis, Mike	yes	no	
Landsperg, Tony	yes	no	
Laverriere, Eric	no	yes	efiles and email
Lebeau Gavin, Nicole	yes	yes	specified areas of email
Lemmo, Jeffrey	yes	yes	efiles and email
Lewis, Chris	no	yes	n/a
L'Heureaux, Bob	yes	no	
Lucarell, Gregory	yes	no	
Malloy, William	no	yes	efiles and email
Markos, Christopher	yes	no	
McFarland, John	no	yes	email
McGowan, Debra	yes	no	
Merriam, Aaron	no	yes	efiles and email
Michaud, Mike	yes	yes	email
Nance, Millard	yes	no	
Natale, Mary	no	yes	email
Newlands-Campbell, Beth	yes	yes	specified areas of email
Nolan, Kevin	yes	yes	email
Norton, Michael	yes	no	
Odden, Steve	no	yes	email
Paquette, Heather	yes	no	
Paro, Ron	yes	yes	efiles and email
Perkins, Tom	yes	no	
Pouliot, Angela	yes	no	
Ramsayer, Rick	yes	no	
Roberts, Doug	yes	yes	efiles and email
Sabattus, Paul	yes	no	
Schools, Bob	yes	no	
Shain, Melinda	yes	no	
Silva, Henry	yes	no	
Smith, Steve	yes	yes	email
Stanhope, Karen	yes	no	
Stevens, Sherri	yes	no	
Taggart, Edward C	no	yes	email
Tirrell, Brett	yes	no	
Turner, John	yes	no	
Washburn, Bill	yes	yes	email
White, Jack	no	yes	email
Wise, Brad	no	yes	email
Witas, Earl	yes	no	
Witwicki, Thomas	yes	yes	entire mailbox, plus specified docs

**Exhibit C - Forensic Image Inventory**

**GENERAL DYNAMICS**  
Advanced Information Systems

**Evidence Log**

Machine Name		Custodian		Serial No.		Gold Copy
HSDC0200B	4/17/2008	Dan Fasulo	Hard Drive	b365p6b097s9	72	G
Store 16	4/17/2008	Dan Fasulo	Hard Drive	3ja7wye0	36	G
Unknown	4/17/2008	Dan Fasulo	Hard Drive	b365p6b097s5	72	G
Sync0200A	4/17/2008	Dan Fasulo	Hard Drive	uf01p28068cb	72.8	G
SCM0200A	4/17/2008	Dan Fasulo	Hard Drive	uf01p28062mf	72.8	
Store 10	4/17/2008	Dan Fasulo	Hard Drive	3ja7xx22	36	
WEB9 DRIVE 0	4/22/2008	Dan Fasulo	Hard Drive	3bt2186t	18	G
WEB9 DRIVE 1	4/22/2008	Dan Fasulo	Hard Drive	3kp18b9f	72.8	G
WEB9 DRIVE 2	4/22/2008	Dan Fasulo	Hard Drive	3fe0y4dr	18	G
WEB9 DRIVE 3	4/22/2008	Dan Fasulo	Hard Drive	4w23706udf	18	G
WEB10 DRIVE 0	4/22/2008	Dan Fasulo	Hard Drive	5i038101f3n	18.2	G
WEB10 DRIVE 1	4/22/2008	Dan Fasulo	Hard Drive	sgd535g11r	72.8	G
WEB10 DRIVE 2	4/22/2008	Dan Fasulo	Hard Drive	3n018500hw0	18.2	G
WEB10 DRIVE 3	4/22/2008	Dan Fasulo	Hard Drive	3u00c5023ea	36.4	G
Store 138	4/22/2008	Dan Fasulo	Hard Drive	3ja0eptn	36.4	G
Store 279	4/22/2008	Dan Fasulo	Hard Drive	3cd1b77w	36.4	G
Store 350	4/22/2008	Dan Fasulo	Hard Drive	42tulr8129	36.4	
SCAN FILE OFFICE DRIVE	4/22/2008	Dan Fasulo	Hard Drive	8q37lr81w0dd	36.4	G
Unknown	4/22/2008	Dan Fasulo	Hard Drive	4c0vish13t	36.4	
WEB09 DRIVE 0	4/22/2008	Dan Fasulo	Hard Drive	14006500sc3	18.2	
Store 223	4/22/2008	Dan Fasulo	Hard Drive	8q34lr81s07v	36.4	G
Store 345	4/22/2008	Dan Fasulo	Hard Drive	40qrlr811w	36.4	G
Store 349	4/22/2008	Dan Fasulo	Hard Drive	3u02b50gg53	36.4	
Store 387	4/22/2008	Dan Fasulo	Hard Drive	8h39lr811h7	36.4	G
Store 390	4/22/2008	Dan Fasulo	Hard Drive	3u02b50f6p2	36.4	
Store 221	4/22/2008	Dan Fasulo	Hard Drive	4kf2lr811w	36.4	
WEB09 DRIVE1	4/22/2008	Dan Fasulo	Hard Drive	3n02a504ykd	72.8	G
RECEIVED FROM THERESA BROSS	4/22/2008	Dan Fasulo	Hard Drive	2sd652f0wv	36.4	
Store 384	4/22/2008	Dan Fasulo	Hard Drive	3u02b50gg2n	36.4	
Store 222	4/22/2008	Dan Fasulo	Hard Drive	85041301bq8	36.4	
Store 389	4/22/2008	Dan Fasulo	Hard Drive	map3367nc	36	
WEB10 DISK 1	4/22/2008	Dan Fasulo	Hard Drive	8504c301jt4	36.4	G
Store 226	4/22/2008	Dan Fasulo	Hard Drive	2sd652f0ax	36.4	G
Store 384	4/22/2008	Dan Fasulo	Hard Drive	4c14lsh13t	36.4	G
WEB10 DISK0	4/22/2008	Dan Fasulo	Hard Drive	3u006501hgq	18.2	G
Store 351	4/22/2008	Dan Fasulo	Hard Drive	43k7lr8129	36.4	
Store 386	4/22/2008	Dan Fasulo	Hard Drive	40qclr811w	36.4	
Store 187	4/22/2008	Dan Fasulo	Hard Drive	3u02b50f6xv	36.4	G
Store 231	4/23/2008	Dan Fasulo	Hard Drive		36.4	G
Store 188	4/23/2008	Dan Fasulo	Hard Drive		36.4	
EPS0200DB1	4/23/2008	Dan Fasulo	Hard Drive		146.8	G
EPSTESTAPP1	4/23/2008	Dan Fasulo	Hard Drive		146.8	G

EPSTESTAPP2	4/23/2008	Dan Fasulo	Hard Drive		146.8	G
DB2	4/23/2008	Dan Fasulo	Hard Drive		146.8	
APP2	4/23/2008	Dan Fasulo	Hard Drive		146.8	G
Unknown	4/23/2008	Dan Fasulo	Hard Drive	3n01a503chl	36.4	G
NT SERVER SLOT 0	4/23/2008	Dan Fasulo	Hard Drive		36.4	G
Store 386	4/23/2008	Dan Fasulo	Hard Drive		300	G
SCAN FILE OFFICE DRIVE	4/23/2008	Dan Fasulo	Hard Drive		36.4	G
NTSERVER DRIVE 0	4/23/2008	Dan Fasulo	Hard Drive		36.4	G
Store 354	4/23/2008	Dan Fasulo	Hard Drive		36.4	
EPSHIS DRIVE 4	4/23/2008	Dan Fasulo	Hard Drive		300	G
EPSHIS DRIVE 0	4/23/2008	Dan Fasulo	Hard Drive		300	G
EPSHIS DRIVE 5	4/23/2008	Dan Fasulo	Hard Drive		300	
RX HARD DRIVE	4/23/2008	Dan Fasulo	Hard Drive		40	G
MM PC HARD DRIVE	4/23/2008	Dan Fasulo	Hard Drive		20	
BEETLE M HARD DRIVE	4/23/2008	Dan Fasulo	Hard Drive			G
MGR HARD DRIVE	4/23/2008	Dan Fasulo	Hard Drive		10	
HP HARD DRIVE	4/23/2008	Dan Fasulo	Hard Drive		80	
HP HARD DRIVE	4/23/2008	Dan Fasulo	Hard Drive		80	G
MANAGER'S PC HARD DRIVE	4/23/2008	Dan Fasulo	Hard Drive		20	G
MULTIMEDIA PC HARD DRIVE	4/23/2008	Dan Fasulo	Hard Drive		20	G
CASH OFFICE POS WORKSTATION HARD DRIVE	4/23/2008	Dan Fasulo	Hard Drive		40	G
Store 386 LOSS PREVENTION OFFICE WORKSTATION HARD DRIVE	4/23/2008	Dan Fasulo	Hard Drive		40	
Store 386 TILL ROOM POS WORKSTATION HARD DRIVE	4/23/2008	Dan Fasulo	Hard Drive		40	G
Freeagent Pro	4/23/2008	Dan Fasulo		9qj076b9	1000	
Freeagent Pro	4/23/2008	Dan Fasulo		9qj07ymh	1000	
POSLN031722.dd	5/2/2008	Jason Ingalls	Register (Linux)		1	
POSLN031722_MD5_HAS H.TXT	5/2/2008	Jason Ingalls	Register (Linux)		1E-06	
POSLN081722.DD	5/2/2008	Jason Ingalls	Register (Linux)		1	
POSLN_CLONING LOG.TXT	5/2/2008	Jason Ingalls	Register (Linux)		1E-06	
Unknown	5/12/2008	Mike Michaud	Hard Drive	3ja0zda1	36.4	G
Victor	5/27/2008	Joe Tucker	Log Files	9qj07zxa	271	G
Tango	6/9/2008	Joe Tucker	Log Files	6gg2v86c	222	G
Romeo	6/16/2008	Carolyn Curtis	Log Files	5gg0xy45	328	G
POS Staging Server "Images fo POS Servers"	6/16/2008	Bill Washburn	Hard Drive	b8g26hhm	146.8	G
Neon DB Backup (Seagate)			GOLD COPY	9qj08302		G

SUBTOTAL (GB) 7092.2

## **Exhibit D - Final Keyword List**

Attack*	IT Security Plan
Breach	Malware
CISP	PCI
Complian*	Pen Test
Credit Card Security	Penetrat*
Credit Card Theft	PIN & Encrypt*
Cyber Risk	POS Systems
Cybertrust	Privacy Audit
Data Leak	Privacy Policy
Data Privacy	Project Shop
Data Security	Retail Protection
Data Theft	Secret Service
Data Traffic	Secure & Encrypt*
Debit Transactions	Security Audit
Defense & Security	Security Call
Disclosure	Security Report
EPS Switch	Security Strategy Meeting
EPS System	Security Summit
Forensic Analysis	Sequel Injection
Hack	Service Plus
Hacker	Shop Project
ID Data	SQL Injection
Identity Fraud	Track 1
Information Risk	Track 2
Information Security & Notification	Track Data
Infosecurity	Unsecured
Internet & Defense	Verisign
Internet Security	Vulnerab*