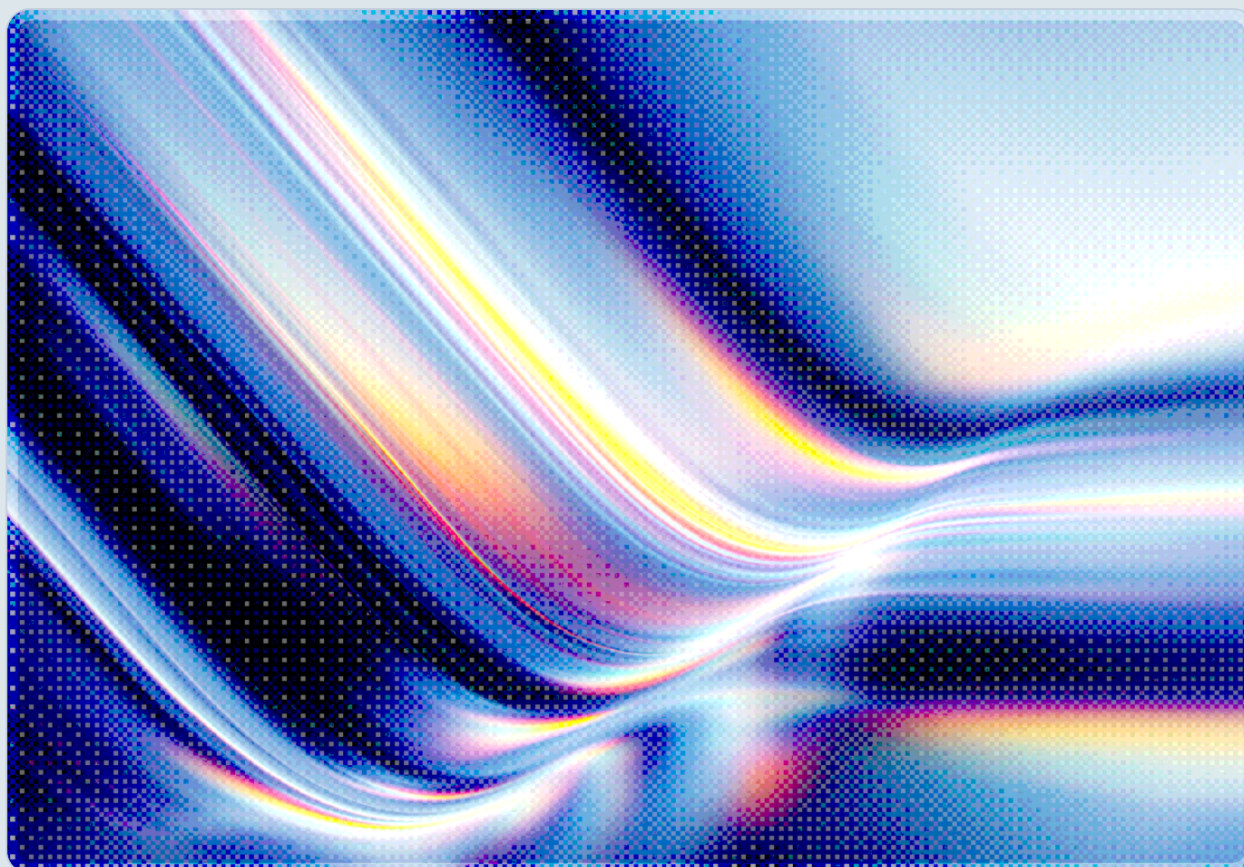


Delegated Custodianship: FBI Jobs Portal and Denmark's CPR

Third-Party Operator Risk in Government Data: Security Implications and Guidance

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 AI-assisted Rapid Research



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Key Takeaways

Two government data incidents disclosed within days of each other in early October 2026 share a structural feature: in each, the entity that held legal responsibility for sensitive records was not the entity whose control lapse exposed them. The FBI attributed the compromise of its jobs portal to a contractor that did not apply a security patch [1][2]. Denmark's digitalization ministry reported that attackers reached names, addresses, and personal identification numbers for 8.8 million people through the account of a private company with lawful access to the Central Person Register (CPR) [4][5].

The two cases fail in different places. The FBI incident concerns an operational duty (patching) delegated to a platform maintainer. The Danish incident concerns an access grant (query rights) delegated to a commercial consumer of the register. Both illustrate what this note calls *delegated custodianship*: the data owner retains accountability to the public and regulators while the practical ability to protect the data sits with a party the owner can observe only partially.

Several points follow for security and governance leaders. Where a security task is assigned by contract, these cases suggest that the assignment alone does not protect the owner unless the owner can verify compliance independently, and the public consequences in both incidents fell first on the data owner. Delegated access also needs behavioral monitoring on the owner's side: in the Danish case the activity reportedly continued for roughly ten days before an employee noticed it, and the responsible minister acknowledged, in the words reported in English-language coverage, that safeguards "had not been solid enough" [4][5]. A patch requirement in an operations contract is likewise only as strong as the owner's ability to check it, for example through external attack-surface scanning of the delegated platform.

Finally, several facts remain unconfirmed or contested, including the contractor's identity in the FBI case (the FBI has not named it) and how the Danish company's systems were compromised [1][4]. This note separates reported facts from inference throughout.

Background

The two incidents unfolded in parallel over a few weeks in September and October 2026, and the public record for each is still thin. The sections below set out what has been reported, who reported it, and where the sources disagree or are silent.

The FBI Jobs Portal Incident

In September 2026, the extortion group ShinyHunters claimed to have breached the FBI and published a sample of data it said related to roughly 5,000 FBI agents, with fields reportedly including names, Social Security numbers, home addresses, work assignments, and family members' names [3]. The same source reports the attacker's further claim to hold applicant data. NBC News reported the group's alleged haul at two to three terabytes of files and noted that it could not independently verify the extent of the claims [1]. How the claimed dataset relates to the jobs portal itself is not established in the sources reviewed, so every figure here is an attacker claim.

On October 6, 2026, the FBI stated through Cyber Division Assistant Director Brett Leatherman that the incident "occurred as the result of a security failure of a platform managed by a third-party organization – after a contractor failed to implement a security patch" [1][2]. The FBI said it had removed the contractor from managing the site and had taken steps to mitigate risk for its workforce, and did not publicly identify the contractor [1]. Reuters-sourced reporting subsequently identified the contractor as Accenture and the platform as Oracle PeopleSoft; Accenture reportedly said it was "proud to support the mission of the FBI" and did not answer questions about the alleged patch omission [2][6]. The FBI's own statement did not name the company, so the attribution rests on press sources.

Technical reporting ties the intrusion to CVE-2026-35273 in Oracle PeopleSoft, exploited against the Environment Management Hub (PSEMHUB) endpoint using a URL-encoding technique that reportedly bypassed web application firewall rules [2]. Press accounts also state that Google had warned in June 2026 of a ShinyHunters-linked extortion campaign targeting PeopleSoft users, and that Oracle issued a security alert and fixes the same day as that warning [6]. These details come from a single secondary report that could not be independently corroborated. If they are accurate, a vendor fix and a public threat warning were both available well before the portal was compromised. Coverage also reports arrests of ShinyHunters members, though accounts differ on the number and timing, and one outlet's dates for an arrest precede the reported intrusion [1][2]. Readers should treat the arrest details as unsettled.

The Danish CPR Incident

Denmark's CPR is the national population register, maintained under the digitalization ministry, with records going back to 1968 [4]. On October 5, 2026, Danish authorities announced that unauthorized parties had obtained CPR data for roughly 8.8 million people, including living residents, deceased persons, and people who had emigrated [4][5]. The release states that the access did not include the names and addresses of people with name-and-address protection, although reporting notes it is unclear whether their CPR numbers were reached [4][5].

The reported mechanism was misuse of a Danish company's legitimate CPR access. The ministry's release states that unauthorized parties used the company's access, that the access has been stopped, and that Datatilsynet (the data protection authority) and police were notified [5]. Reporting indicates that the activity took place during roughly ten days in September and involved a very large number of automated lookups, that a CPR administration employee noticed it on Friday, October 2, and that the exposed fields were names, addresses, and CPR numbers [4]. Minister Christina Egelund informed parliament's relevant committee and ordered what she described as a comprehensive review of CPR security. Reporting quotes her, in translation, as saying that safeguards "had not been solid enough" and indicates that alarms should have been triggered given the duration of the access [4][5]. The affected population is reported as about 80 percent of the register's roughly 11 million records [4].

Several questions remain open. Public reporting does not establish how the company's systems or credentials were compromised, who the attackers are, or whether the extracted data has been retained or used [4]. Secondary analyses describe the attack as credential abuse without malware or software exploitation, but those descriptions come from commentary sites rather than from the authorities, and this note treats them as unverified [7]. No statement from the company is cited in the sources reviewed.

Security Analysis

Delegated Custodianship as a Failure Pattern

Both incidents fit a pattern that public-sector and enterprise risk programs know well but frequently under-control. A data owner defines who may hold or query its data and under what conditions, then relies on the delegate to maintain the controls the owner would apply internally. Three assumptions are embedded in that arrangement: that the delegate will perform routine security hygiene, that the delegate's own credentials and systems are protected to a comparable standard, and that anomalies will be visible to someone with authority to act. The FBI case tests the first assumption and the Danish case tests the second and third. Because the two cases differ in kind, a duty in one and an access grant in the other, the common pattern is best read as an analogy rather than an identity.

The table below compares the two incidents along the dimensions that matter for control design.

Dimension	FBI Jobs Portal	Denmark CPR
Data owner	FBI	Digitalization ministry (CPR administration)

Dimension	FBI Jobs Portal	Denmark CPR
Delegate	Contractor maintaining the PeopleSoft platform	Private company with authorized register access
Delegated function	Platform patching and maintenance	Lawful querying of register records
Reported control lapse	Required patch for CVE-2026-35273 not applied [1][2]	Company's authorized account misused by unauthorized parties over roughly ten days, with a very large number of automated lookups [4][5]
Data affected (reported)	Attacker-claimed data on about 5,000 agents; extent and link to the portal unverified [1][3]	Names, addresses, CPR numbers for about 8.8 million people [4]
Detection	Extortion claims by the attacker, followed by an FBI statement [1]	Internal employee noticed unusual activity after about ten days [4]
Open questions	Contractor named only by press sources; scope of data unverified [1][2]	Compromise method, attacker identity, downstream use [4]

Operational Duties Are Harder to Verify Than Access Rights

The FBI incident shows that a patch is a delegated duty with no natural audit trail on the owner's side. A contract can require that critical vulnerabilities be remediated within a defined window, but the owner usually learns of non-compliance only if it independently measures the platform. In this case, the relevant exposure was an internet-reachable PeopleSoft management endpoint and a publicly documented vulnerability [2][6]. Both are conditions that external attack-surface monitoring can surface without any cooperation from the contractor. The reported WAF bypass also shows that compensating controls placed in front of an unpatched system can be defeated, so a WAF rule should not be treated as a substitute for the fix [2].

There is also a question of who tracks the vendor advisory. If the Oracle alert and Google warning described in press coverage reached the contractor but not a named, accountable person on the FBI side, the owner had no way to ask whether the fix had been applied [6]. Mature third-party programs therefore assign an internal owner for each delegated platform whose job includes subscribing to the relevant vendor and threat advisories and asking for evidence of remediation, not only receiving periodic attestations.

Access Grants Require Owner-Side Behavioral Controls

In the Danish case, the registry owner had lawfully extended query access to a commercial party. Once that party's account was in attacker hands, the owner's authentication and authorization layers would have seen a valid, authorized identity. The relevant control is therefore behavioral: whether the owner's monitoring compares each delegate's query volume and pattern against an expected baseline and acts on large deviations. Reporting that the activity lasted about ten days and was caught by an employee, together with the indication that alarms should have been triggered, suggests that automated detection or response was either absent or insufficient for this account type [4]. That is an inference from public statements, not a confirmed finding of the investigation.

The scale is relevant to the design of rate and scope controls. The reported affected population equals about 80 percent of the register's roughly 11 million records [4]. A business consumer of a population register typically needs lookups for its own customers or cases, so harvesting a large share of the register through one account is a pattern that per-account quotas, anomaly thresholds, or request-justification fields could constrain. Some consumers may hold legitimate bulk-access arrangements, which would call for different controls, and the scope of this company's lawful access has not been published. The cost of such controls falls on the owner, which is the point: the owner cannot assume that the delegate's own safeguards are the last line of defense.

Accountability Does Not Travel With the Task

Both public responses were led by the data owner. The FBI removed the contractor and said it would bring those responsible to justice [1]. The Danish ministry halted the company's access, notified the regulator, and ordered a review of its own system [5]. In the FBI case, the contractor made only a brief statement and lost its role managing the site, but the FBI, not the contractor, carried the public and workforce consequences [1][2]. In the Danish case, no statement from the company is cited in the sources reviewed. Investigations are ongoing and contractual remedies may not be public, but organizations should treat the delegate's control environment as part of their own attack surface and apply risk acceptance decisions accordingly.

CSA research on ShinyHunters-linked intrusions makes a similar argument for SaaS vendors. Its analysis of a year of OAuth-token supply-chain compromises, including the Klue breach, describes how credentials held by a third party became the path to customer data and frames the weakness as one of governance over delegated access [8]. The government cases here differ in sector and mechanism, but the governance conclusion is the same: the party accountable for the data must have enforceable visibility into how it is handled.

Relevance to AI-Enabled Operations

Although neither incident involved AI systems, the pattern is relevant to organizations adopting AI agents and AI-assisted tooling, which add new categories of delegate. An agent holding credentials to query a registry, or an AI vendor processing records on behalf of an agency, is a delegate in the same sense as the FBI's platform maintainer or Denmark's authorized company. Automated lookups at scale are also something agentic workflows can produce, which makes volume-based anomaly baselines harder to set and more important to maintain. CSA's analysis of the Klue incident describes a comparable dynamic in which a long-dormant vendor credential was used to harvest customer OAuth tokens and exfiltrate customer data [8].

Recommendations

Immediate Actions

Organizations that rely on contractors or external parties to maintain systems holding sensitive personal data should first establish whether they hold an authoritative inventory of those delegations. For each internet-facing platform managed by a third party, confirm the current patch level against vendor advisories, with particular attention to PeopleSoft deployments and any management endpoints reachable from the internet. Teams running Oracle PeopleSoft should verify that the fix for CVE-2026-35273 is applied and review web logs for requests to the Environment Management Hub endpoint [2].

For external parties holding query rights to registers or customer datasets, review the last 90 days of access logs per account and look for sustained high-volume or automated lookups. Where a delegate's credentials cannot be tied to a named individual or workload with documented purpose, suspend or restrict them until that is established. Rotate delegate credentials where compromise of the delegate's environment cannot be ruled out.

Short-Term Mitigations

Within the next quarter, move from attestation-based assurance to evidence-based assurance for delegated operational duties. This means external attack-surface scanning of delegate-managed assets, contractual rights to receive patch status evidence on request, and defined escalation when a critical vendor advisory passes its remediation window. Name an internal accountable owner for each delegated platform whose responsibilities include tracking vendor and threat advisories.

For delegated access, implement per-account behavioral baselines, quotas, and alerting on the owner's side, with a documented response path that can suspend an account without waiting for the delegate. Require phishing-resistant authentication and workload-bound credentials for automated consumers where the technology allows, and consider request-level purpose fields for high-sensitivity lookups. Test detection with periodic simulated bulk-harvest scenarios against delegate accounts.

Strategic Considerations

Over a longer horizon, organizations should treat delegated custodianship as a distinct risk category in their governance model, with explicit statements of which controls the owner retains regardless of delegation. Data minimization belongs in that model: a register or portal that exposes fewer fields per query, or tiered access by purpose, reduces the consequence of any single delegate's compromise. Contracts should provide for audit rights, breach-notification timing, and remediation obligations that are measurable, and procurement should weigh the delegate's ability to demonstrate those controls rather than only its stated commitments.

Public-sector bodies should also consider how they communicate about such incidents. In the FBI case, the identification of the contractor came from press sources while the agency declined to name it [1][6]. Clear, consistent disclosure of the delegation relationship supports accountability and allows other customers of the same platform or provider to assess their own exposure.

CSA Resource Alignment

CSA's research on third-party credential abuse is the most directly relevant prior work. *ShinyHunters' OAuth Pivot: A Year of SaaS Supply-Chain Breaches* [8] covers the same threat actor named in the FBI incident and addresses the access-grant side of delegated custodianship, including the Klue breach, in which credentials issued to or held by a third party became the path to customer data. It supports the

recommendation in this note that delegate credentials be inventoried, scoped, monitored, and revocable by the data owner, with a defined owner, documented justification, and scheduled re-certification for each grant.

For control mapping, the AI Controls Matrix v1.1 [9] provides the standing framework. Its supply chain management, transparency and accountability, identity and access management, and threat and vulnerability management domains map respectively to the delegation inventory, the accountability analysis, the access-grant controls, and the patch-assurance recommendations above. Organizations applying STAR-based assurance to vendors can use these mappings to define which evidence they require from delegates.

References

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