DATA BREACH PROCEDURE TABLE FOR THE DIOCESE OF SHREWSBURY

Is the breach likely to result in a risk to the rights and freedoms of natural persons? Is it likely to have a significant detrimental effect on individuals?
(e.g. breach of confidentiality, damage to reputation significant economic or social disadvantage?)

YES

Must notify the ICO <u>without delay</u> and certainly within 72 hours stating:
(a) the nature of the Personal Data breach including where possible the categories and approx. no. of Data Subjects concerned and the categories and approx. no. of Personal Data records concerned;
(b) the name and contact details of the [•] or other contact point where more information can be obtained;
(c) the likely consequences of the Personal Data breach;
(d) the measures taken or proposed by the Data Controller to address the data breach including, where appropriate, measures to mitigate its possible adverse effects.

1. Was the Personal Data affected by the breach protected so it was unintelligible to unauthorised users? (e.g. encrypted)

NO

Must notify the Data Subject(s) without undue delay in clear and plain language stating:
(a) the name and contact details of the [•] or other contact point where more information can be obtained;
(b) the likely consequences of the Personal Data breach;
(c) the measures taken or proposed by the Data Controller to address the data breach, including, where appropriate, measures to mitigate its possible adverse effects.

OR

2. Have you taken steps to ensure this risk is no longer likely to materialise?

YES

No need to notify the Data Subject

OR

3. Would notifying the Data Subject(s) involve disproportionate effort?

YES

Use a public communication to notify Data Subject(s)

NO

NO

No need to notify the ICO but the Data Controller shall document any Personal Data breaches, comprising the facts relating to the Personal Data breach, its effects and the remedial action taken. That documentation shall enable the ICO to verify compliance.

No need to notify the Data Subjects.