OnBoarding Group

• DEVELOPING DIVERSE BOARDS •

Data Breach Report

Introduction

Under the GDPR (General Data Protection Regulation), organisations must report data breaches to the DPC (Data Protection Commission) within 72 hours of becoming aware of them.

This does not only refer to cyber criminals breaking into your systems, but it also applies to any kind of data breach i.e., any time the confidentiality, integrity or availability of information is compromised. Failure to disclose an incident could lead to penalties under the GDPR's second tier of fines – up to £10 million or 2% of your organisation's annual global turnover, whichever is higher.

Situational Analysis

OnBoarding Officers Limited take the consequences of a potential data breach very seriously. The faster a security incident is identified, the sooner we can mitigate the damage and alert those affected.

Therefore, in the event of a data breach, all staff must identify and document the following information:

- The type of breach you are reporting.
- The level of risk the breach poses to affected data subjects.
- When the breach occurred and how it was detected.
- The nature of the breach.
- Whether you have notified any affected individuals.
- Whether the breach has been contained.

Assessing the Affected Data

In order to assess any affected data, you must identify and document the following information:

- The type of personal data that has been breached (names, addresses, payment card information, etc.).
- Whether special categories of data were involved.
- How many individuals were affected.
- Whether vulnerable individuals were affected. This includes children, people with mental illnesses, asylum seekers, the elderly, and data subjects whose relationship with the data controller contains an imbalance of power (employee-employer or tutor-learner, for example).

To avoid a potential breach, OnBoarding Group Limited map the data flows through the organisation. In doing so this gives us an understanding of all the personal data we collect, store or otherwise process, as well as where and how we transfer it.

As part of this process, OnBoarding Group Limited documents these movements, which enables us to identify key elements of the data, such as the type of information, the format it's stored in, the location it's kept and the lawful basis for processing.

Describing the Impact

When looking at the impact OnBoarding Group Limited must identify and document the potential consequences of the breach for individuals. OnBoarding Group Limited may also be required to provide a follow-up report that describes:

- Any measures that were in place before the breach that aimed to prevent an incident of that nature.
- Actions the Company has taken to fix the problem and mitigate any adverse effects.
- Steps the Company is taking to prevent a recurrence, and when you expect to complete these steps.

This process enables OnBoarding Group Limited to identify and assess relevant threats to the Company and establish the potential impact of a data breach on both the business and data subjects.

OnBoarding Group Limited also conduct regular Risk Assessments in order to implement measures that help manage any risks.

Preventive Measures and Actions Taken

Data breaches can occur even if a company has appropriate measures in place. As such, to mitigate any risks, OnBoarding Group Limited must identify and document the following information:

- Whether staff were made aware of their GDPR compliance responsibilities.
- Whether data subjects have been informed about the breach and how it might affect them.
- Whether you've told, or are planning to tell, other relevant organisations about the breach.

Oversight

In the event of a data breach or suspected data breach, this must be reported to the Management Team immediately on info@onboarding-group.com or 0204 5378049.

When do you need to report a data breach?

The above steps need to be followed for incidents that "pose a risk to the rights and freedoms of natural living persons". This refers to the possibility of affected individuals facing economic or social damage, such as discrimination, reputational damage, or financial losses.

This policy will be reviewed annually by the Management Team.

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Data Breach Log Sheet

Breach:	Date:	Time:	Description of What Happened:	Action Taken:	Staff Member Who Dealt with This:	Any Further Action Required:

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