

1. Scope

This procedure applies in the event of a personal data breach under Article 33 of the GDPR – *Notification of a personal data breach to the supervisory authority* – and Article 34 – *Communication of a personal data breach to the data subject*.

2. Responsibility

- 2.1 All users (whether employees, contractors or temporary employees and third party users) and the Directors of Meath Partnership are required to be aware of, and to follow this procedure in the event of a personal data breach.
- 2.2 All employees, contractors or temporary personnel are responsible for reporting any personal data breach to the CEO.

3. Procedure – Breach notification data processor to data controller

- 3.1 Meath Partnership reports any personal data breach or security incident to the data controller without undue delay. Meath Partnership provides the controller with all of the details of the breach. The data processing contract between the controller and the processor (i.e. Meath Partnership in a limited number of circumstances) should state the contact details and relevant procedures for making contact regarding data breaches.
- 3.2 The breach notification is made by email and phone call.
- 3.3 A confirmation of receipt of this information is made by email and phone call.

4. Procedure – Breach notification data controller to supervisory authority

- 4.1 Meath Partnership determines if the supervisory authority need to be notified in the event of a breach.
- 4.2 Meath Partnership assesses whether the personal data breach is likely to result in a risk to the rights and freedoms of the data subjects affected by the personal data breach, by conducting a data protection impact assessment against the breach. A template for the DPIA is available as [GDPR REC 4.4](#).
- 4.3 If a risk to data subject(s) is likely, Meath Partnership reports the personal data breach to the supervisory authority [Data Protection Commission of Ireland] by email and phone without undue delay, and not later than 72 hours.
- 4.4 If the data breach notification to the supervisory authority is not made within 72 hours, Meath Partnership's CEO submits it electronically with a justification for the delay.
- 4.5 If it is not possible to provide all of the necessary information at the same time Meath Partnership will provide the information in phases without undue further delay.
- 4.6 The following information needs to be provided to the supervisory authority:
 - 4.6.1 A description of the nature of the breach
 - 4.6.2 The categories of personal data affected
 - 4.6.3 Approximate number of data subjects affected

- 4.6.4 Approximate number of personal data records affected
 - 4.6.5 Name and contact details of the CEO, responsible for GDPR compliance within Meath Partnership.
 - 4.6.6 Consequences of the breach – those that have occurred and those likely to occur.
 - 4.6.7 Any measures taken to address the breach.
 - 4.6.8 Any information relating to the data breach.
- 4.7 The CEO notifies the supervisory authority namely the Data Protection Commission of Ireland. Contact details are as follows:
- Email: info@dataprotection.ie
Phone: +353 57 8684800 or +353 (0)761 104 800
Address: **Data Protection Commission**, Canal House, Station Road, Portarlinton, R32 AP23, Co. Laois
- 4.8 In the event the supervisory authority assigns a specific contact in relation to a breach, these details are recorded by the Company Administrator.
- 4.9 The breach notification is made by email and phone call.
- 4.10 A confirmation of receipt of this information is made by email.
- 5. Procedure – Breach notification data controller to data subject**
- 5.1 If the personal data breach is likely to result in high risk to the rights and freedoms of the data subject, Meath Partnership notifies those/the data subjects affected immediately by written correspondence (email and/or registered letter).
- 5.2 The notification to the data subject describes the breach in clear and plain language, in addition to information specified in clause 4.6 above.
- 5.3 The data controller takes subsequent measures to ensure that any risks to the rights and freedoms of the data subjects are no longer likely to occur.
- 5.4 If the breach affects a high volume of data subjects and personal data records, Meath Partnership makes a decision based on assessment of the amount of effort involved in notifying each data subject individually, and whether it will hinder the Meath Partnership's ability to appropriately provide the notification within the specified time frame. In such a scenario a public communication or similar measure informs those affected in an equally effective manner.
- 5.5 If Meath Partnership has not notified the data subject(s), and the supervisory authority considers the likelihood of a data breach will result in high risk, Meath Partnership will communicate the data breach to the data subject by email and/or registered letter.
- 5.6 Meath Partnership documents any personal data breach(es), incorporating the facts relating to the personal data breach, its effects and the remedial action(s) taken in order to allow the supervisory authority to verify compliance.