

You notice a data breach

Employee, service civique, sub-processor (consultant, sub-contractor), intern, board member

You must report it

within 12 hrs or ASAP if involves security data

Use CartONG's template (part 1) or partner's template.

Email DPO + PM. Put admin in copy (if equipment issue). *At the weekend: skype or phone!*

**1- Assessment of gravity and potentially impacts (on data subjects, etc.)
2- Steps taken to quickly address the breach**

Use CartONG's template (part 2) or partner's template.

DPO & PM (occasionally, admin team and/or IT team as well)

Malicious activity?

YES

NO

File a complaint to the Police

DPO

Data controller

Level of risk for data subjects?

NONE

HIGH

LIMITED

Submit report to CNIL & contact data subjects

Submit report to CNIL

Within 72hrs

Document breach in the register*

Action Plan necessary?

NO

YES

Prepare & implement Action Plan

End of process



For joint-controller scenarios: check the agreement to see which process to follow!

Data processor

PM with DPO

Level of risk?

HIGH

LIMITED

Call or Skype partner + email (with report)

Email (with or without report)

Within 24hrs

Document breach in the register*

Partner asks we contact the supervisory authority and/or inform data subjects?

YES

Submit the report to relevant body and/or contact data subjects

Within 72hrs

YES

Action Plan necessary?

NO

YES

Prepare & implement AP with partner

End of process

*You might need to resubmit an updated version of the report at this stage to the CNIL or the partner. Use CartONG's template (part 3) or partner's template.

ATT: Deadlines are expressed from the moment the breach is discovered