

REPORTING OF PERSONAL DATA BREACH [TEMPLATE]

URGENT

TO:

NAME: [full name of Data Controller]

Name of recipient: [...]

- e-mail address: [...]

- telephone number: [...]

- fax-number: [...]

- other: [...]

FROM:

Gravity Research & Development Zrt.

DATE AND TIME OF SENDING: [...]

METHOD OF SENDING

- e-mail: [please specify the e-mail addresses to which the report has been sent]
- fax
- other: [...]

1. Contact Person details		
1.1	Name and address of Data Processor:	Gravity Research & Development Zrt.
1.2	Name of the Data Processor's data protection officer (if any) or other contact person:	
1.3	Contact details of the above person (if any or telephone, mobile number and email address of the contact person):	
2. Most significant information regarding the breach of personal data („first part”)		
2.1	Date of the Personal Data Breach taking place (estimated, if necessary):	
2.2	Date of observing the Personal Data Breach:	
2.3	Method and circumstances of breaching personal data:	
2.4	Nature and content of the affected personal data:	
2.5	Technical and organizational measures proposed or applied by the Data Processor in order to protect the affected personal data:*	
2.6	Relations to the use of other data processors (if any):	
2.7	Name of other data processor:	

2.8	Name of contact person of the other data processor:	
2.9	Contact details of the above person:	
2.10	Activities/roles of the other data processor (what does the other provider do):	
3. Additional information regarding the breach of personal data („second part”)		
3.1	Summary of the Personal Data Breach, indicating the physical location of the breach and the affected data medium:	
3.2	Categories and number of Data Subjects affected:	
3.3	Description of the potential consequences and negative impacts to the Data Subjects**:	
3.4	Technical and organizational measures applied by the Data Processor in order to mitigate potential negative effects:	
4. Cross border relevancy (if any)		
4.1	Are there any Data Subjects residing in other EU member states:	

Remarks for completing the form

Remarks to 2.5 above

It is highly important to provide detailed information *whether the appropriate technical security measures have been executed or whether such measures have been used in respect of the data affected by the security breach.*

Remarks to 3.3 above

It is a significant aspect whether the Personal Data Breach may have a negative effect on the personal data or personal life of Data Subjects. Whether the Personal Data Breach may have a negative impact on the protection of personal data or personal life of Data Subjects in particular the following shall be taken into account:

- a) the nature and content of the affected personal data in particular if such personal data concerns *financial information, sensitive data* (e.g. data concerning religious, ethnical or sexual orientation, health or other similar data), *geolocation data, internet log files, internet browsing history, e-mail data*;
- b) the potential effects of breaching personal data to the Data Subjects in particular if the breach of personal data may lead to the abuse of personal data, damage to physical well-being, defamation or damage to reputation; and
- c) the circumstances of the breach of personal data, in particular if the suspicion of criminal offences (as defined by the applicable Criminal Code) of *illicit access to data, breach of information system or data, or compromising or defrauding the integrity of the computer protection system or device* emerge or if the Data Processor becomes aware that the data are being processed by unauthorized parties.