



UCD PERSONAL DATA INCIDENT REPORT FORM

In the event of a personal data incident it is vital to ensure it is dealt with promptly to minimise its affect in case it results in a personal data breach.
Under GDPR we must notify the Data Protection Commission (DPC) within 72 hours of awareness of a breach and there are penalties for not doing so.

Once aware of a potential breach:

1. You must report it to your Head of School/Unit immediately
2. You must complete the form below or ask your Head of School/Unit to do so (or their delegate)
3. Email the completed form to the Office of the DPO at gdpr@ucd.ie

If you complete this form yourself, ensure your Head of School/Unit reviews it when you have completed it and ensure it is kept updated on the management of the incident.

SECTION 1: INCIDENT TIMELINE	<i>To be completed by Head of Dept/School/Unit or delegate</i>
Date and <u>precise time</u> of incident: [This is when the incident actually occurred]	
Date and <u>precise time</u> incident was detected: [This is when UCD became aware of the incident]	
Date/time of reporting incident to Office of DPO: [Timely reporting is crucial to satisfy GDPR's 72 hour deadline. If you are reporting outside this time-frame please explain why?]	
Is the incident on-going?	
School/Unit where incident occurred:	
Name of Head of School/Unit:	
Name of person reporting incident:	
Has Head of School/Unit been informed?	<input type="checkbox"/> Yes <input type="checkbox"/> No
SECTION 2: ABOUT THE INCIDENT	
Please give a brief written account of what has occurred. Once this is complete you can go through the following 'tick box' questionnaire	

Does the incident involve accidental or unlawful:	<input type="checkbox"/> Disclosure of personal data <input type="checkbox"/> Alteration of personal data <input type="checkbox"/> Unauthorised access to personal data <input type="checkbox"/> Loss of access to personal data <input type="checkbox"/> Physical loss of personal data <input type="checkbox"/> Destruction of personal data <input type="checkbox"/> Other (if none of the above please give detail)
In the case of disclosure, are you aware of any relationship between the affected individual and the recipient of data:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
If you answered yes to above, please give further detail.	
Which of the following do you think may have caused the incident: (i.e. the nature of the incident)	<input type="checkbox"/> Email account compromised <input type="checkbox"/> Hacking <input type="checkbox"/> Device lost or stolen (encrypted) <input type="checkbox"/> Device lost or stolen (unencrypted) <input type="checkbox"/> Paper lost or stolen <input type="checkbox"/> Inappropriate disposal of paper <input type="checkbox"/> Malware <input type="checkbox"/> Phishing <input type="checkbox"/> Unintended online publication <input type="checkbox"/> Network security breach <input type="checkbox"/> Other (if none of above please give detail)
How do you think the incident was caused i.e. do you believe the incident to be:	<input type="checkbox"/> Employee error or omission <input type="checkbox"/> Employee intentional act <input type="checkbox"/> Contractor error or omission <input type="checkbox"/> Contractor intentional act <input type="checkbox"/> External error or omission <input type="checkbox"/> External intentional act
SECTION 3: ABOUT THE DATA AFFECTED BY INCIDENT	
What identifying details relating to individuals were disclosed? <i>(Please do not include any of the personal data itself!)</i>	<input type="checkbox"/> Individual's identity e.g. name, date of birth <input type="checkbox"/> PPSN or other national ID number <input type="checkbox"/> Student ID number <input type="checkbox"/> Identification data (e.g. passports, licence data) <input type="checkbox"/> Economic or financial data <input type="checkbox"/> Location data <input type="checkbox"/> Criminal convictions <input type="checkbox"/> Other (if none of above please give detail)

<p>Do you know the number of individuals affected?</p> <p><i>(Please do not include any of the personal data itself!)</i></p>	<input type="checkbox"/> Actual (Please give number if known) _____ <input type="checkbox"/> Approximate <input type="checkbox"/> Unknown
<p>Do you know the number of affected records?</p> <p><i>(Please do not include any of the personal data itself!)</i></p>	<input type="checkbox"/> Actual (Please give number if known) _____ <input type="checkbox"/> Approximate <input type="checkbox"/> Unknown
<p>Are individuals in other EU member states likely to be affected?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
<p>Were any special categories of data or other highly private data involved?</p> <p><i>(Please do not include any of the personal data itself!)</i></p>	<input type="checkbox"/> Racial or ethnic origin <input type="checkbox"/> Political opinions <input type="checkbox"/> Religious or philosophical beliefs <input type="checkbox"/> Membership of a trade union <input type="checkbox"/> Genetic or biometric data <input type="checkbox"/> Data concerning health <input type="checkbox"/> Data concerning sex life/sexual orientation <input type="checkbox"/> Data concerning a criminal conviction <input type="checkbox"/> Economic or financial data
<p>Were vulnerable individuals affected?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
<p>If applicable, does the breach involve personal data maintained for the prevention, investigation, detection or persecution of criminal offences or the execution of criminal penalties of the state?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unknown
<p>SECTION 4: MEASURES IN PLACE BEFORE BREACH, & MEASURES TO RESPOND TO BREACH</p>	
<p>What deficiencies in the organisational or technical measures have been identified as a result of this breach?</p>	
<p>Please explain what mitigating factors will be put in place i.e. is there a need for reviewing processes, retraining, etc. please outline:</p>	
<p>When will these measures be implemented?</p>	
<p>Have you secured/returned the breached data?</p> <p>If no, please explain why not?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No

SECTION 5: CONSEQUENCES/DAMAGES OF THE BREACH FOR THE AFFECTED INDIVIDUALS	
<p>What in your view are the potential consequences of the breach for affected individuals:</p>	<input type="checkbox"/> Loss of control over their personal data <input type="checkbox"/> Limitation of their rights <input type="checkbox"/> Discrimination <input type="checkbox"/> Reputational damage <input type="checkbox"/> Identity theft <input type="checkbox"/> Fraud <input type="checkbox"/> Financial loss <input type="checkbox"/> Others (if none of the above please give details)
<p>Does the breach evaluate/analyse/predict the following (in order to create/use personal profiles):</p>	<input type="checkbox"/> Performance at work <input type="checkbox"/> Economic situation <input type="checkbox"/> Location/movements <input type="checkbox"/> Reliability/ behaviour/ health <input type="checkbox"/> Personal preferences/interests
<p>Considering all the responses to the questions above, how would you now assess the breach:</p> <p>Severe Risk: the breach may have a critical, extensive or dangerous impact on affected individuals</p> <p>High Risk: individuals will encounter significant difficulties which they may be able to overcome albeit with serious difficulties (i.e. misappropriation of funds, blacklisting by banks, property damage, loss of employment) or worse still they will face irreversible consequences which they may never overcome (i.e. substantial debt or inability to work, long term psychological or physical ailments)</p> <p>Medium Risk: individuals may encounter significant inconveniences which they will be able to overcome despite a few difficulties (i.e. extra costs, denial of access to business services, stress, minor physical ailments)</p> <p>Low Risk: individuals will not be affected or may encounter a few inconveniences, which they will overcome without any problem</p> <p>No Risk: device was encrypted so there is no risk to the individual</p>	<p><i>Please read descriptions in left column to help you with your evaluation and please tick below:</i></p> <input type="checkbox"/> Severe <input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low <input type="checkbox"/> No risk
SECTION 6: NOTIFICATION TO AFFECTED INDIVIDUAL	
<p>Have you notified affected individuals of breach:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>If yes, how:</p> <p><i>Can you please send a copy of this to the Office of the DPO (gdpr@ucd.ie) for their records?</i></p>	<input type="checkbox"/> Formal letter <input type="checkbox"/> Email message <input type="checkbox"/> Telephone call <input type="checkbox"/> Website notice <input type="checkbox"/> Press/media notification