

EU GDPR in a complex transnational data breach scenario

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1. Step - Identify the risk

- Art. 33 GDPR - risk -> notification to DPA
- Art. 34 GDPR - high risk -> information of data subjects

2. Step - react not later than 72h after having become aware of it

3. Step - notify professionally with the necessary information

- describe the nature of the personal data breach
- number of data subjects concerned and the categories a
- communicate contact details, DPO or other contact point
- describe the likely consequences of the personal data breach
- describe the measures taken to mitigate risks

4. Step - document the decision internally

Experience on the reaction of the Data Protection Authorities

Principle of cooperation between Data Protection Authorities

