

Reporting PERSONAL-DATA BREACHES

Data Controller: University of Padova

Data-Protection Officer (DPO): Mr. Giovanni Marconi – Contact details: privacy@unipd.it

Reporting, collecting information, evaluating and communicating a breach

Stage	Activity	Who	To whom	When	How
1	Discovering and reporting a data breach	All staff, collaborators, suppliers, managers	Department manager	As soon as it becomes apparent	Using the quickest means (e.g. telephone, personally, email)
2	Collecting information about the breach	Department manager or deputy manager, as well as the impacted individuals		As soon as communication has been received	Collecting information from the data subjects involved in the report and in the processing of the breached data
3	Communicating a data breach	Department manager or deputy manager	Data-Protection Officer (DPO)	As soon as basic information about the data breach has been received	Using the quickest means or email: privacy@unipd.it
4	Evaluating impact	Controller, DPO, ICT experts, impacted individuals		As soon as communication has been received	

Stage	Activity	Who	To whom	When	How
5	Establishing corrective measures	DPO, ICT experts, Impacted individuals		As soon as the impact evaluation has been completed	Using standard means
6	Communicating evaluation and measures	DPO, department manager, deputy manager, or privacy manager			With a report
7	Notification of the data breach (if necessary)	Controller	Supervisory authority	Within 72 hours of discovery	With the form provided by the supervisory authority
8	Notifying impacted individuals (if necessary)	Controller	Impacted individuals	In the terms stated in the impact evaluation	Direct communication to the impacted individuals or publication on an accessible website of any consequences the breach might have on the categories of individuals impacted