

26 October 2023

ICO Case Reference IC-265869-J2Y0

Request for information

Request received 23 October 2023.

The request is to know if a personal data breach report was made to the ICO by Invincibles Studio (formerly Soccer Manager), in or around July 2020.

Your request has been handled under the Freedom of Information Act 2000 (the FOIA). This legislation provides public access to recorded information held by a public authority unless an appropriate exemption applies.

Our response

We do not hold information in scope of your request. Having searched our casework management system I could not find a personal data breach (PDB) report matching the details you provided.

Further information

Please be aware that due to the ICO [Retention and Disposal Policy](#), we do not hold casework records indefinitely. A report may have been made that has since been deleted.

Please also be aware that not every PDB is reportable to the ICO. In the event of a breach, an organisation must assess the risk to the individual(s) affected. We have guidance for when and how to [Report a breach](#) on our website.

We also regularly provide advice to data controllers by telephone to assist them with breach incidents. These calls are not recorded.

We publish details of [Personal data breach cases](#) reported to us in our [Complaints and concerns data sets](#). Some more serious PDBs are referred to our investigations department, and these are shown in the relevant investigations datasets.

This concludes our response to your request.

FOI review procedure

If you are dissatisfied and wish to request a review of our decision or make a complaint about how your request has been handled you should write to the Information Access Team at accessicoinformation@ico.org.uk, or the postal address below.

Your request for internal review should be submitted to us within 40 working days of your receipt of this response. Any such request received after this time will be considered only at the discretion of the Commissioner.

If having exhausted the review process you are not content that your request or review has been dealt with correctly you have a further right of appeal to this office in our capacity as the statutory complaint handler under the legislation.

To make such an application, please write to our FOI Complaints and Compliance team at the address given, or visit our website at [Official information concern | ICO](#).

Your information

Our [Privacy Notice](#) explains what we do with the personal data you provide to us and what your rights are. This notice includes entries regarding the specific purpose and legal basis for the ICO processing information that people such as [information requesters](#) have provided to us.

The length of time we keep information is laid out in our [retention and disposal policy](#).

Yours sincerely

Information Access Team
Strategic Planning and Transformation

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For information about what we do with personal data see our [privacy notice](#)