

From: icocasework@ico.org.uk
To: [REDACTED]
CC:
Subject: Acknowledgement - IC-73323-V4X7
Direction: Outgoing
Date Sent: 29/11/2020 08:47

Reference Number IC-73323-V4X7

Dear [REDACTED]

Thank you for contacting the ICO to report a personal data breach. The breach was reported to the ICO on 24 November 2020.

The ICO will use the information you have provided to determine what course of action is necessary. We shall contact you in due course to confirm the outcome.

In the meantime, we would recommend that you read the [security](#) guidance on our website.

If you would like to provide any additional information about the incident reported, please send it to icocasework@ico.org.uk and enter the reference number in the subject line. This will ensure the correspondence is added directly to the correct electronic case file.

If the person we should contact about this case changes, please let us know.

If we can be of any further assistance please contact our Helpline on 0303 123 1113.

Yours sincerely

Personal Data Breach Service

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
T. 0303 123 1113 ico.org.uk twitter.com/iconews
Please consider the environment before printing this email

Please be aware we are often asked for copies of the correspondence we exchange with third parties. We are subject to all of the laws we deal with, including the data protection laws and the Freedom of Information Act 2000. You can read about these on our website (www.ico.org.uk). Please say whether you consider any of the information you send us is confidential. You should also say why. We will withhold information where there is a good reason to do so.

For information about what we do with personal data see our privacy notice at www.ico.org.uk/privacy-notice

From: icocasework@ico.org.uk
To: [REDACTED]
CC:
Subject: ICO Decision - IC-73323-V4X7
Direction: Outgoing
Date Sent: 22/12/2020 14:25

22 December 2020

Reference Number IC-73323-V4X7

Dear [REDACTED]

I am writing further to your email regarding [REDACTED]
[REDACTED]

Thank you for the information you have provided.

Data security requirements

You are required to have appropriate technical and organisational measures in place to ensure the security of personal data.

Our Decision

We have considered the information you have provided and we have decided that no further action by the ICO is necessary at this time. This decision is based on the information we have recorded about the breach.

The reasons for our decision are as follows:

[REDACTED]

However, we recommend that you investigate the causes of this incident, to ensure that you understand how and why it occurred, and what steps you need to take to prevent it from happening again.

In particular, we recommend that you consider the following:

- Upon completion of your investigations, please update the ICO if you assess that the threshold to report this incident has been met, using the above case reference number.
- If you become aware of any detriment caused to the data subjects as a result of the incident, please notify the ICO of this using the above case reference number.
- Should it transpire that any of the personal data has been shared with unauthorised third parties, you should take steps to ensure that said data is deleted / destroyed and not used any further. In doing so, we would advise that you seek written confirmation that the

information has been deleted from any third party.

- Any personal data that is used without the data subjects being provided with accurate privacy information or without valid consent (where necessary) would likely constitute an infringement of the General Data Protection Regulation. This incident therefore represents an opportunity to ensure that you act in a [fair, lawful and transparent](#) manner.

The ICO recognises the unprecedented challenges many organisations are facing during the Coronavirus (COVID-19) pandemic, and are reflecting this in our processes. We understand that in some cases, resources might be diverted away from usual compliance or information governance work. We fully understand this may lead to a delay in your investigation being completed and implementation of the recommendations listed. Therefore, we ask you to complete them as soon as you are able to, as this will help to protect the personal data you hold from similar occurrences in future.

Please also note that as a result of a breach an organisation may experience a higher volume of complaints and information rights requests. You should not refer them to the ICO as a matter of course, and it is important that you deal with these, alongside the other work that has been generated as a result of the breach. However, we do recognise some organisations may experience delays in dealing with these requests at this current time, we have advised data subjects they may see delays whilst organisations prioritise tasks, you can read more about this on our [Coronavirus information hub](#).

Thank you for notifying the ICO of this incident. Further information and guidance relating to [data security](#) is available on our website.

Please note that we may make additional enquiries if we become aware of new information which affects the circumstances of this case.

Yours sincerely

Robin Gennery
Lead Case Officer
0330 414 6801

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Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

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