

Data Breach/IT Security Breach Prioritisation Table

When considering whether the breach results in individuals being at “*risk of suffering discrimination, damage to reputation, financial loss, damage or distress or any other economic or social disadvantage*”, the risk assessment must consider the following:

1. The type of breach
2. The nature sensitivity and volume of personal data
3. The ease of identification of individuals
4. The severity of consequences for the individual
5. Special characteristics of the individual
6. The number of affected individuals
7. Special characteristics of the data controller

(For more details see Article 29 Working Party Guidelines on Personal Data Breach Notification under Regulation 2016/679)

Level Descriptor	Low	Medium	High	Serious
Electronic Data Breach/IT Security Breach by electronic means e.g. by fax or email	Data breach <ul style="list-style-type: none"> Wrongful internal access to electronic data/information containing personal and confidential information AND Limited amount of data involved AND Breach contained 	Data breach <ul style="list-style-type: none"> Wrongful external access to electronic data/information containing personal and confidential information AND Limited amount of data involved AND Breach contained 	Data breach <ul style="list-style-type: none"> Wrongful internal/external access to electronic data/information containing personal and confidential information AND Individuals are at risk of suffering discrimination, damage to reputation, 	Data breach <ul style="list-style-type: none"> Wrongful internal/external access to electronic data/information containing personal and confidential information AND Individuals are at high risk of suffering discrimination, damage to reputation,

	<p>IT Security Breach</p> <ul style="list-style-type: none"> • Unauthorised internal access to data/information containing personal and confidential information for internal use with another users password OR • Internal access to data/information containing personal and confidential information for internal use due to misconfigured access controls AND • Incident contained 	<p>IT Security Breach</p> <ul style="list-style-type: none"> • Unauthorised external access to data/information containing personal and confidential information for external use with another user's password OR • External access to data/information containing personal and confidential information for external use due to misconfigured access controls AND • Breach contained 	<p>financial loss, damage or distress or any other economic or social disadvantage</p> <p>IT Security Breach</p> <ul style="list-style-type: none"> • Unauthorised external access to data/information containing personal and confidential information for internal and external use with another users password AND • Limited amount of data involved OR • External access to data/information containing personal and confidential information for internal and external use due to misconfigured access controls AND • Individuals are at significant risk of suffering loss, damage or distress 	<p>financial loss, damage or distress or any other economic or social disadvantage e.g. threat of identity theft</p> <p>IT Security Breach</p> <ul style="list-style-type: none"> • Unauthorised external access to data/information containing personal and confidential information for internal and external or use with another users password AND • Significant amount of data involved OR • External access to data/information containing personal and confidential information for internal and external use due to misconfigured access controls AND • Individuals are at high risk of suffering discrimination, damage to reputation, financial loss, damage or distress or any other economic or social disadvantage e.g. threat of identity theft
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Hard copy Breach relating to hard copies of information (e.g. files/letters/documents)	Data breach <ul style="list-style-type: none"> • Hard copies left unsecure in NCC premises OR • Hard copies transferred or sent mistakenly to incorrect internal address or sent wrongly to that address OR • Lost or misplaced information in an internal location AND • Limited amount of data involved AND • Breach contained 	Data breach <ul style="list-style-type: none"> • Hard copies transferred or sent mistakenly to incorrect external address or sent wrongly to that address • Lost or misplaced information in an external location AND • Limited amount of data involved AND • Breach contained 	Data breach <ul style="list-style-type: none"> • Hard copies transferred or sent mistakenly to incorrect internal or external address or sent wrongly to that address • Lost, stolen or misplaced information in an internal or external location AND • Individuals are at risk of suffering discrimination, damage to reputation, financial loss, damage or distress or any other economic or social disadvantage 	Data breach <ul style="list-style-type: none"> • Hard copies transferred or sent mistakenly to incorrect internal or external address or sent wrongly to that address OR • Lost, stolen or misplaced information in an internal or external location AND Individuals are at high risk of suffering discrimination, damage to reputation, financial loss, damage or distress or any other economic or social disadvantage e.g. threat of identity theft
Oral Breach through inappropriate conversation	Data breach <ul style="list-style-type: none"> • Inappropriate discussion of personal/confidential information internally AND • Limited amount of data involved AND • Breach contained 	Data breach <ul style="list-style-type: none"> • Inappropriate discussion of personal/confidential information in a public place or in joint organisation/partner meeting leading to the disclosure of information to a 3rd party AND • Limited amount of data involved AND • Breach contained 	Data breach <ul style="list-style-type: none"> • Inappropriate discussion of sensitive information in joint organisation/partner meeting leading to the disclosure of information to a 3rd party AND • Individuals are at risk of suffering discrimination, damage to reputation, financial loss, damage or distress or any other economic or social disadvantage 	Data breach <ul style="list-style-type: none"> • Inappropriate discussion of sensitive information in joint organisation/partner meeting leading to the disclosure of information to a 3rd party AND Individuals are at high risk of suffering discrimination, damage to reputation, financial loss, damage or distress or any other economic or social disadvantage e.g. threat of identity theft

KEY TO MATRIX	Serious Risk	Level 1 response required
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	High Risk	Level 1 response required
	Medium Risk	Level 2/3 response required
	Low Risk	Level 2/3 response required