What if I don't yet have all the details of the breach for the GDPR notification?

For: Paušalni obrt · Obrtnici · j.d.o.o. · d.o.o. · Privatni iznajmljivač · Platformski rad preko vlastitog obrta

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Applicability: For data processing managers upon becoming aware of a personal data breach.

Article 33(4) allows information to be provided in phases when it is not possible to supply it all at once. This does not remove the obligation to respond in a timely manner if notification is required.

When this is applied

Record what you know, what you are still verifying and who will complete the record. Distinguish between the knowledge that an injury has occurred and the completion of the professional analysis.

What to do in practice

Set a deadline for the first assessment and record when information is still missing.

A business example

The supplier confirms that some user records were publicly accessible, but only later determines the full number of users. In its initial report, the company states what it has and its plan for topping up.

Specific next steps

1. Set a deadline for the first assessment and record when information is still missing.

Limits of application

For data processing managers upon becoming aware of a personal data breach.

Sources

GDPR · Article 33, paragraphs 1 and 5

https://eur-lex.europa.eu/legal-content/HR/TXT/?uri=CELEX%3A32016R0679

AZOP · Personal Data Breach Reporting

https://azop.hr/izvjescivanje-o-povredi-osobnih-podataka/

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https://adriatrends.hr/poslovni-vodic/en/pitanja/gdpr-povreda-nepotpuna-saznanja