



ECS Group will in the event of a Data Breach notify directly the assigned data controller. The breach will then be investigated and the severity of the breach ascertained.

The data controller taking the following, but not limited to, into account when assessing the severity of the breach:

- Severity
- Type of Breach (disclosure or loss of data)
- Sensitivity of data (eg: is the data related to medical information)
- How easy is it to identify individuals from the data
- Potential consequences
- Special characteristics of individuals affected (data on children or vulnerable individuals for instance)

Depending on the findings of this analysis and any other factors related to the incident, the company will decide on what needs to be reported.

Should a breach be deemed significant (likely to result in high risk to the rights and freedoms of individuals) to require reporting the Individuals concerned will be contacted as soon as possible notifying them of the situation. The ICO will also have a report filed with them detailing the nature and effect of the breach within 72 Hours.



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