

Identification

1. A process should be in place to identify Data Breaches or potential Data Breaches. This should involve active monitoring of electronic and paper records
2. Once a data breach, or potential data breach, is identified, it should immediately be recorded with as much information as possible (Date & Time of breach, Date & Time of identification, Data Involved, Number of Individuals impacted, description of breach and cause of breach, if known)
3. An individual may also raise a concern regarding a potential breach, this must be investigated
4. The GAA DPO should be informed immediately (dataprotection@gaa.ie)

Assessment

1. A risk assessment should be carried out to identify if there are risks to the Rights or Freedoms of the individual
2. If there is deemed to be no risk to the individual (if the data has been encrypted or is anonymised etc.) the reasons for this decision should be documented
3. The GAA DPO should be notified and the outcome recorded
4. If there is a risk to the individual(s), the reasons for this decision must be documented and the Office of the Data Protection Commissioner must be informed (within 72 hours of becoming aware of the breach)
5. If there is a high risk to the individual(s) the reasons for this decision must be documented, the Office of the Data Protection Commissioner must be informed (within 72 hours of becoming aware of the breach) and every individual involved must be informed without undue delay

Notification

1. If the Office of the Data Protection Commissioner is being notified of a breach, due to a risk or high risk to the rights and freedoms of the individual, the following must be included:
 - a. Description of breach
 - b. Categories of data involved
 - c. Number of individuals involved
 - d. Description of likely consequences
 - e. Description of measures taken or proposed to be taken to mitigate the risks
 - f. Name and contact details of the Clubs Data Protection representative
2. If the individual is being notified of a breach, due to a high risk to their rights and freedoms, the following must be included:
 - a. Clear and plain English description of breach
 - b. Description of likely consequences
 - c. Description of measures taken or proposed to be taken to mitigate the risks
 - d. Name and contact details of the Clubs Data Protection representative

Investigation & Outcomes

1. If the Office of the Data Protection Commissioner is involved, they will conduct an investigation and instruct on the actions to be taken to resolve the matter
2. The outcome of this investigation will be communicated to the Club
3. The GAA Data Protection Officer should be informed of the outcome of this investigation
4. The club must take whatever actions instructed by the Data Protection Commissioner
5. The club must implement measures to ensure similar breaches cannot reoccur

Data Breach – Process Overview

