

## Personal Data Breach Notification Procedure

IBP shall, **without undue delay and, where feasible, not later than 72 hours after having become aware of it**, notify the personal data breach to the supervisory authority (ICO). If the breach is unlikely to result in a risk to the rights and freedoms of natural persons, IBP will **document this rationale**.

When the personal data breach **is likely to result in a high risk** to the rights and freedoms of natural persons, IBP shall **communicate** the personal data breach to the data subject without undue delay.

When notifying the ICO and the individual data subjects, the following details will be disclosed:

- the nature of the personal data breach
- categories and approximate number of both affected data subjects, and the types of personal data records
- the name and contact details for the responsible contact point at IBP
- the likely consequences of the breach for the data subjects
- a description of the measures taken, or proposed by IBP, to address or mitigate the breach / effects

**Records are kept by IBP for all breaches**, including minor and unreported ones.