Swedish Authority for Privacy Protection

Notification of a personal data breach

Use this form to prepare your notification of a personal data breach. You can then register in our e-service. Please note that the numbering of the questions in the form does not correspond to the numbering in the e-service.

Fields with an asterisk (*) are mandatory.

Completing the notification
It is possible to provide additional information afterwards, but it is important that we receive the information as soon as possible. If no supplementary information has been received after four weeks from the date on which we received the notification, a decision will be made on the matter on the basis of existing information. Fill in all fields marked with an asterisk (*) and the fields to be amended or completed.

Important information in regards to cross-border personal data breaches
An incident is cross-border if it has occurred in Sweden but affects registered persons in other countries or has occurred in at least one other country besides Sweden. If you do not have your central administration in Sweden and decisions on the purposes and means of the processing are taken in a country other than Sweden, you should not report the incident to us. Instead, contact the supervisory authority located in the country where you have your main establishment of business. A list of European data protection authorities is available at www.edpb.europa.eu.

Read more about personal data breaches on our website www.imy.se/pui.
On our website you will also find information about how the Swedish Authority for Privacy Protection (IMY) handles personal data.

The information in the notification becomes a public document

All information you provide in the notification will become public record. This means that we may need to disclose the information if someone requests it, and when there is no provision of confidentiality that prevents it. It is the Swedish Authority for Privacy Protection that decides what we will disclose.

You should avoid providing more information than necessary. If you provide any information that you consider should be covered by confidentiality, you can describe this in a free text field at the end of the notification form.

Notification

1. Indicate the purpose of this notification*

**This question is mandatory. Select only one option.*

- ○ New notification of a personal data breach
- ○ Supplement or amend your original personal data breach notification.
  Case number of your original notification:

Controller

2. Name of the organisation*

*Enter the name of the controller where the data breach occurred. *This question is mandatory.*

3. Corporate identity number*

*Enter the company identity number XXXXXX-XXXX. *This question is mandatory.*

4. Organisation's postal address*

*Postal address of the controller (i.e. not the visiting address). *This question is mandatory.*
Please specify:
Address
Postal code
City
Country

5. Internal reference number of your organisation

If you wish, please provide your own reference number for your internal follow-up.

Contact details for the data breach notification

6. Name of the contact person*

*Enter the name of the person that the Privacy Protection Authority can contact. *This question is mandatory.*

7. E-mail address of the contact person*

**This question is mandatory.*

8. Phone number of the contact person*

**This question is mandatory.*

9. Do you have a Data Protection Officer?

- (●) Yes
  If yes, please provide the E-mail address of the DPO:
- ( ) No

Data processors

10. Does the data breach relate to personal data processing that is carried out by a processors or sub-processors?*

**This question is mandatory.*

- ( ) Yes
  If yes, please enter the name of the organisation and its corporate identity number:
- ( ) No

National or cross-border personal data breach

11. Has the incident occurred in or in part in Sweden?*

**This question is mandatory.*

- ( ) Yes
- ( ) No

12. Are registered persons in other countries affected?*

**This question is mandatory.*

- ○ Yes
- ○ No

13. Which countries are affected by the incident?

Select all the options that apply.

- ☐ Belgium
- ☐ Bulgaria
- ☐ Cyprus
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Greece
- ☐ Ireland
- ☐ Iceland (EEA)
- ☐ Italy
- ☐ Croatia
- ☐ Latvia
- ☐ Liechtenstein (EEA)
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Norway (EEA)
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Slovakia
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden
- ☐ Czechia
- ☐ Germany
- ☐ Hungary
- ☐ Austria

14. Do you have your central administration in Sweden and decisions on the purposes and means of personal data processing are not taken in any other country within the EU/EEA?*

**This question is mandatory.*

- ○ Yes
- ○ No

15. Do you have your central administration in a country other than Sweden, but decisions on the purposes and means of personal data processing are made in Sweden?*

**This question is mandatory.*

- ○ Yes
- ○ No

Sector and field of activity

16. In which sector did the data breach occur?

Select only one option.

- ○ Public sector
- ○ Private sector
- ○ Other, e.g. non-profit sector

17. In what area of activity did the data breach occur?

Select only one option.

- ○ Health and medical care
- ○ Social services
- ○ Preschool, Primary School, High School
- ○ Post-secondary education
- ○ Research
- ○ Financial or insurance
- ○ Credit information
- ○ Debt collection
- ○ Other business activity
- ○ Police
- ○ Other judicial authorities
- ○ Non-profit organisation or economic association
- ○ Municipal authority
- ○ Govermental authority
- ○ Religious communities
- ○ Other

If you answered 'Other', enter a comment in the free text field:

The data breach

18. When did you become aware of the data breach?

Enter date
YYYY-MM-DD

Specify the time
TT:MM

If your notification has been delayed more than 72 hours after you discovered the data breach, please explain why:

19. How did you become aware of the data breach?

Select only one option.

- ○ Through an automized procedure: technical security measures
- ○ Through organisational routines, such as regular checks
- ○ One of our employees informed us
- ○ Our data processor informed us
- ○ A person outside the organisation or a data subject informed us
- ○ Other

  If you answered 'Other', enter a comment in the free text field:

20. When did the data breach occur?

Enter date
YYYY-MM-DD

Specify the time
TT:MM

21. Is the data breach still ongoing?

Select only one option.

- ○ Yes
- ○ No

  If no, when did the data breach end?

  Enter date
  YYYY-MM-DD

  Specify the time
  TT:MM
- ○ Do not know

22. What has happened in relation to the data breach?

Select the option that best matches what happened.

- ○ Unauthorised disclosure through mailings of e-mail/letter/sms
- ○ Unauthorised disclosure: other
- ○ Unauthorized access: Someone within or outside the organisation has accessed information that they were not authorized to access
- ○ Loss: information has been lost in some way, for example by a computer being stolen
- ○ Destruction: someone or something has destroyed information, for example by a computer broken
- ○ Alteration: personal data has been changed in any way

23. Short description of the data breach

24. In your organisation’s opinion, why did the data breach occur?

Select only one option.

- ○ Human error: a single mistake
- ○ Lack of organisational routines or procedures: systematic errors
- ○ Technical errors, such as software bugs, program settings
- ○ Intentional attacks from someone within the organisation: internal attacks
- ○ Antagonistic attacks: attacks from outside
- ○ Unknown cause
- ○ Other

If you answered ‘Other’, enter a comment in the free text field:

Consequences and measures

25. What could be the consequences of the incident?

Select all the options that apply.

- ☐ The data subject loses control over his or her personal data
- ☐ Deprivation of rights
- ☐ Discrimination, identity theft or fraud
- ☐ Financial loss
- ☐ Unauthorized reversal of pseudonymisation
- ☐ Reputational damage
- ☐ Loss of confidentiality of personal data protected by professional secrecy
- ☐ Other economic or social disadvantage
- ☐ Other

If you answered 'Other', enter a comment in the free text field:

26. How serious is this data breach in your opinion?

Select only one option. Assess how serious the breach is with regard to the data subjects' privacy.

- ○ Negligible
- ○ Limited
- ○ Significant
- ○ Very serious

27. How have you acted after the data breach? Describe the measures you have taken or proposed to rectify the personal data breach.

Describe what you have done. Have you taken action or intend to take action to solve problems, prevent or mitigate the effects of the incident?

Action 1

Enter date
YYYY-MM-DD

Specify the time
TT:MM

Description of the measure
Describe what you have done. Have you taken action or do you intend to take action to solve problems, prevent or mitigate the effects of the data breach?

Action 2

Enter date
YYYY-MM-DD

Specify the time
TT:MM

Description of the measure
Describe what you have done. Have you taken action or do you intend to take action to solve problems, prevent or mitigate the effects of the data breach?

Action 3

Enter date
YYYY-MM-DD

Specify the time
TT:MM

Description of the measure
Describe what you have done. Have you taken action or do you intend to take action to solve problems, prevent or mitigate the effects of the data breach?

Action 4

Enter date
YYYY-MM-DD

Specify the time
TT:MM

Description of the measure
Describe what you have done. Have you taken action or do you intend to take action to solve problems, prevent or mitigate the effects of the incident?

Data and data subjects

28. Is the data breach likely to result in a high risk to the rights and freedoms of natural persons?

- ○ Yes
- ○ No
- ○ We have not decided yet

29. Have you informed the data subjects?

- ○ **Yes**

  If yes, please answer the question below.

  When did you inform the data subjects?

  Enter date
  YYYY-MM-DD

  Specify the time
  TT:MM

- ○ **No**

  If no, please answer the questions below.

  Will you inform the data subjects?

  - ○ Yes

    If you have answered "Yes", when will you inform the data subjects?

    Enter date
    YYYY-MM-DD

    Specify the time
    TT:MM

  - ○ No

    If you have answered "No", why will you not inform the data subjects? Select all the options that apply.

    - ☐ The data breach does not result in a high risk to the rights and freedoms of natural persons
    - ☐ The personal data was encrypted or otherwise protected
    - ☐ We have already taken measures to prevent the risk
    - ☐ It would involve a disproportionate effort to inform each data subject individually, we have instead provided information to the public

  - ○ We have not decided yet

30. How many data subjects are affected?

Enter the exact number.

If you do not have an exact number, please provide an estimate by marking one of the options below.
Select only one option.

- ○ 1–10
- ○ 11–100
- ○ 101–1 000
- ○ 1 001–10 000
- ○ 10 001–100 000
- ○ 100 001–500 000
- ○ 500 001–1 million
- ○ More than 1 million
- ○ Unknown / No information available

31. How many personal data records per data subject are affected by the incident?

Select only one option.

- ○ 1–10
- ○ 11–50
- ○ 51–100
- ○ 101–250
- ○ 251–500
- ○ 501–1 000
- ○ More than 1000
- ○ Unknown/No information available

32. Do any of the affected data subjects have protected identity?

- ○ Yes

  If yes, how many data subjects with protected personal data may have been affected by the incident?
  Select only one option.

  - ○ 1
  - ○ 2–5
  - ○ 6–10
  - ○ 11–20
  - ○ 21–50
  - ○ More than 50
  - ○ Unknown / No information available
- ○ No
- ○ Unknown / No information available

33. Which categories of data subjects are concerned?

Select all the options that apply.

- ☐ Employees of the controller
- ☐ Users of the services of the controller
- ☐ Customers of the controller
- ☐ Members, due to membership in an organisation or a customer membership
- ☐ Military staff, i.e. employees in the Swedish Armed Forces
- ☐ Patients
- ☐ Children
- ☐ Not yet known
- ☐ Children in preschool or students in primary and secondary school
- ☐ Students in post-secondary education
- ☐ Other categories that you consider particularly exposed if personal data are disclosed
- ☐ Other

  If you answered 'Other', enter a comment in the free text field:

34. What categories of personal data have been affected by the data breach?

Select all the options that apply.

- ☐ Ethnic origin
- ☐ Political opinions
- ☐ Religious or philosophical beliefs
- ☐ Trade union membership
- ☐ Genetic data
- ☐ Biometric data
- ☐ Health
- ☐ Sexual life or sexual orientation
- ☐ Criminal convictions, offence or related security measures
- ☐ Personal identity number
- ☐ Economic or financial data
- ☐ Location data (e.g. GPS location, not address information)
- ☐ Communication traces, metadata, etc.
- ☐ Identifying information (e.g. first and last name)
- ☐ Contact information
- ☐ Unknown
- ☐ Other

If you answered 'Other', enter a comment in the free text field:

Other

35. Do you intend to supplement your notification?

- ○ Yes

Supplementary information must be given within four weeks of receipt of the notification.

- ○ No

36. Additional information

Do you have any questions?

Read more about personal data breaches on our website www.imy.se/pui
If you do not find the answer there, you can contact us at imy@imy.se or +46 8 657 61 00.