

COMPLIANCE WORKING RECORD

EU personal data breach triage and notification decision record

Data Protection Commission (Ireland) notification route indicated. 1 action-required and 0 unresolved findings.

Document control

Field	Value
Organisation	Harbour Field Services Limited
Document type	EU breach response working record
Document reference	EU-PDB-2026-011
Jurisdiction	European Union
Version	2026.08.07
Status	Action required
Classification	Compliance working record
Prepared by	Data Protection Officer
Prepared on	21 August 2026
Rule pack	2026.08.07
Sources reviewed	7 August 2026
Generated	21 August 2026

Recorded matter

Field	Value
Organisation	Harbour Field Services Limited
Reference	EU-PDB-2026-011
Owner	Data Protection Officer

Field	Value
Summary	A customer-support export containing names, business email addresses and case notes was disclosed to an unintended recipient in another Member State. Access was withdrawn and the recipient confirmed secure deletion.
Jurisdiction	European Union
Organisation role	controller
Member State or lead establishment	Ireland, lead establishment
Supervisory authority	Data Protection Commission (Ireland)
Cross-border processing	yes

Decision

Data Protection Commission (Ireland) notification route indicated

The recorded assessment says risk to people is likely.

- Prepare and submit the Data Protection Commission (Ireland) notification without undue delay and, where feasible, within 72 hours of awareness.
- Record any information supplied in phases and the reason for delay if the 72-hour period is exceeded.

72-hour deadline
9 August 2026 at 10:20 GMT+1

Incident classification

Check	Answer	Record status	Evidence
Personal data breach confirmed	yes	recorded	Incident review confirms an unauthorised disclosure of personal data.

Risk assessment

Check	Answer	Record status	Evidence
Risk to people is likely	yes	recorded	The case notes may reveal service history. Prompt deletion does not make risk unlikely.
High risk to people is likely	no	Action required	No special-category data, credentials or financial information were included.

Response record

Check	Answer	Record status	Evidence
Immediate containment actions recorded	yes	recorded	Link access revoked, deletion confirmation retained and permissions restricted.
Article 33 notification information assembled	yes	recorded	Draft includes breach nature, 214 people, record categories, consequences, measures and DPO contact.
Affected-person communication prepared	Not applicable	Not applicable	High risk is not recorded. Communication will be reconsidered if new facts emerge.

Notification route

Check	Answer	Record status	Evidence
Competent or lead supervisory authority route recorded	yes	recorded	The Irish establishment makes the relevant cross-border processing decisions. The DPC lead-authority rationale is recorded.
Controller notification prepared where the organisation is a processor	Not applicable	Not applicable	The organisation is the controller for this processing.

Accountability

Check	Answer	Record status	Evidence
Breach register entry created	yes	recorded	The register records the facts, effects, remedial action and notification decision.

Approval record

Decision owner	Decision	Date	Signature
Data Protection Officer	To be approved	To be completed	To be completed

Assumptions

- The organisation and responsible owner supplied the recorded facts for reference EU-PDB-2026-011.
- No answer has been inferred from a blank or uncertain response.

Limitations

- This tool does not decide whether an incident is a personal data breach or whether risk is likely. Those facts must be confirmed by an authorised person.
- For a controller, the 72-hour time is elapsed time from the recorded awareness time. Weekends and public holidays do not pause or extend it.
- A processor must notify the controller without undue delay. This tool does not convert that duty into a 72-hour processor deadline.
- The organisation must verify the competent or lead supervisory-authority route and any Member State or sector-specific duties.

Official sources

Source	Provision	Date	Link
Publications Office of the European Union: General Data Protection Regulation, Article 33	Controller notification to the competent supervisory authority and processor notification to the controller	7 August 2026	https://eur-lex.europa.eu/eli/reg/2016/679/art_33/oj

Source	Provision	Date	Link
Publications Office of the European Union: General Data Protection Regulation, Article 34	Communication of a personal data breach to the data subject	7 August 2026	https://eur-lex.europa.eu/eli/reg/2016/679/art_34/oj
European Data Protection Board: Guidelines 9/2022 on personal data breach notification under GDPR		7 August 2026	https://www.edpb.europa.eu/documents/guideline/guidelines-92022-on-personal-data-breach-notification-under-gdpr_en