end

Start

END

No

No

yes

yes

Do you need to notify the ICO?

controller

Processor

No

yes

yes

Consult ICO guidance and follow internal incident policies and respond to mitigate the risk

Notify the data subjects about the breach

Do you need to notify the data subjects?

Notify the ICO about the breach

Consult ICO guidance on how to assess severity

Log the incident and inform the controller

Are you the ‘Controller’ or ‘Processor’ of the data?

Does it involve personal data?

Log the incident

Is it classified as a security incident?

Incident reported/identified and analysed