# Guidelines 9 /2022 on personal breach notification under GDPR

Response 2022

**Submission Timeframe:** 

Friday 4 November 2022

# 1. Amendment

### Paragraph 73

"However the mere presence of a representative in a Member of State does trigger the onestop system. For this reason, the breach will need to be notified to every single authority for which affected data subjects reside in their Member State. This notification shall be done with the mandate given by the controller to its representatives and under the responsibility of the controller."

### Transform and Identification

- Transparency is key to how a breach is identified
- The use of identifying the breach and creating documentation to address the issues within the industry standardizes the issue with how data breaches are reported.

## Reduce the amount of data collected

• The data collected would still take the data rights away from the company as the data would still end up shared amongst other companies.

### Recreate a new mandate

• Setting a new mandate is ideal. However, a mandate on this causes issues through the controller and third parties on how to address breaches with systems and companies.

### Strategy

• The rights of data belong to the data controller and reducing the amount of ownership and access allows the data to be used in a much more controlled environment rather than sending out notifications to every authority on breaches within data.