


**NORMAN MANLEY LAW SCHOOL**

	DEPARTMENT: Office of the Principal	DOCUMENT NO: OP/PDBFo/07	Page 1 of 14
	TITLE: Personal Data Breach Reporting Form - Data Protection Policy (PDBFo)	REVISION NO.: 00	REVISION DATE: October 17, 2024

THE DATA PROTECTION ACT, 2020

NOTICE TO PREVENT PROCESSING

(under section 21(3) of the Act)

Reference No.: [00]

(for internal use only)

**1(a) PARTICULARS OF DATA CONTROLLER**

Name: \_\_\_\_\_

Address: Council of Legal Education, Norman Manley Law School,  
8 Ring Road, P.O. Box 231, Mona, Kingston 7,  
The University of the West Indies, Mona Campus.  
JAMAICA, WEST INDIES.

Contact Person: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Email: \_\_\_\_\_

Scope:       Private                       Public

Other (*please specify*) .....


**(b) PARTICULARS OF DATA CONTROLLER REPRESENTATIVE**

Name: \_\_\_\_\_

Address: Council of Legal Education, Norman Manley Law School,  
8 Ring Road, P.O. Box 231, Mona, Kingston 7,  
The University of the West Indies, Mona Campus.  
JAMAICA, WEST INDIES.

Contact Person: \_\_\_\_\_

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Phone Number: \_\_\_\_\_

Email: \_\_\_\_\_

Scope:         Private                       Public  
 Other (*please specify*) .....

**2. PARTICULARS OF DATA PROTECTION OFFICER**

Name: \_\_\_\_\_

Address: Council of Legal Education, Norman Manley Law School,  
8 Ring Road, P.O. Box 231, Mona, Kingston 7,  
The University of the West Indies, Mona Campus.  
JAMAICA, WEST INDIES.

Phone Number: \_\_\_\_\_

Email: \_\_\_\_\_

Scope:         Private                       Public  
 Other (*please specify*) .....

**3. PARTICULARS OF DATA PROCESSOR (if applicable)**

Name: \_\_\_\_\_

Address: \_\_\_\_\_


Contact Person: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Email: \_\_\_\_\_

Scope:         Private                       Public  
 Other (*please specify*) .....

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**4. PARTICULARS OF OTHER INVOLVED ENTITY**

Is there another entity involved in this data breach?

- Yes       No

*(If yes, complete the information below)*

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Contact Person: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Email: \_\_\_\_\_

- Scope:       Private       Public
- Other *(please specify)* .....

**5. TYPE OF REPORT**

**5.1** Purpose of the report:


- Report of a new personal data breach
- Provide more information regarding a previous report

**5.2** Type of report:

- Comprehensive
- In phases

*Select 'comprehensive' when this report contains all the information that the data controller has been able to gather regarding the data breach and the provision of further information is not foreseen. Select 'in phases' when this is an incomplete report, with further information to follow.*

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**5.3** If in phases, indicate which phase:

- Initial
- Follow-up
- Conclusive

*Follow-up: This is a follow-up to an initial report*

*Conclusive: This is the final information for the breach*

**5.4** In case of a follow-up or conclusive type of report, please indicate , if available, the reference number provided by the Information Commissioner.

**6. ABOUT THE DATA PROCESSING**

**6.1** Approximate number of individuals whose personal data are processed, referring exclusively to the processing activity affected by the personal data breach.

**6.2** The processing activity affected by the breach includes personal data about individuals:

- In Jamaica
- Regionally
- Internationally/worldwide

**7. DETAILS ABOUT THE BREACH AND ITS CONSEQUENCES**


**7.1 TIMELINE OF DATA BREACH**

**7.1. A** Indicate the date and time on which you became aware of the breach.

**7.1. B** Is the date and time when the breach occurred known? (Where applicable, indicate date and time)

- Actual     Estimated     Unknown

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Date/Time:

**7.1. C** How was the breach detected?

- By the data controller or data processor
- Communication from affected data subject
- Via social or other media
- From third parties
- Others: .....

**7.2 CAUSE**

- Accidental or non-malicious act
- Malicious act to damage the data controller, data processor or data subjects
- Unknown intentionality


**7.3 ORIGIN**

- Internal: staff or systems managed by data controller
- Internal: staff or systems managed by data processor
- External: others, unrelated to data controller or data processor

**7.4 HOW DID THE BREACH OCCUR?** *(Select all relevant options)*

- |  |   |
|--|---|
| <input type="checkbox"/> Verbal unauthorised disclosure of personal data   | <input type="checkbox"/> E-waste (personal data still present on obsolete device)                   |
| <input type="checkbox"/> Paper lost or stolen or left in insecure location | <input type="checkbox"/> Unintended publication   |
| <input type="checkbox"/> Mail lost or opened                               | <input type="checkbox"/> Sending email to multiple recipients without blind copy/ distribution list |
| <input type="checkbox"/> Incorrect disposal of personal                    | <input type="checkbox"/> Device lost or stolen  |

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data on paper

- |   |   |
|---|---|
| <input type="checkbox"/> Personal data sent by mistake (postal or electronically)                         | <input type="checkbox"/> Cyber incident: Encrypted device Ransomware                        |
| <input type="checkbox"/> Personal data displayed to wrong recipient                                       | <input type="checkbox"/> Cyber incident: Phishing/user user account compromised             |
| <input type="checkbox"/> Personal data deleted/destroyed  | <input type="checkbox"/> Cyber incident: Unauthorised access to personal data in IT systems |
| <input type="checkbox"/> Abuse of access privileges by employee to extract, forward or copy personal data | <input type="checkbox"/> Technical issue  |
|   | <input type="checkbox"/> Unauthorised data modification                                     |
|   | <input type="checkbox"/> Other .....  |

**7.5 WHAT HAS BEEN AFFECTED AS A RESULT OF THR BREACH?**


- Confidentiality: Persons or organisations that are not authorised, or do not have a legitimate purpose for accessing the data, have been able to access and/or extract it.
- Availability: Personal data have been destroyed, lost or encrypted so that they cannot be processed.
- Integrity: Personal data have been altered, although still accessible, but the replacement of data may result in damage to the persons concerned.

**7.6 WHERE THE BREACH IS A CONFIDENTIALITY BREACH**

Is the data securely encrypted, anonymized or protected so that it is unintelligible to anyone who may have had access, or individuals cannot be identified?

- Yes       No       Unknown

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**7.7 WHERE THE BREACH IS AN AVAILABILITY BREACH**

Has the availability of the data been restored so that it can be processed as usual?

- Yes       No       Not yet, but soon

**7.8 WHERE THE BREACH IS AN INTEGRITY BREACH. (Select the most appropriate option)**

- Data altered, but with no evidence of illegal or wrong use.
- Data altered, wrongly or illegally used, but with the possibility of reversing/recovering the damages.
- Data altered, wrongly or illegally used, without possibility of reversing/recovering Damages.


**7.9 SUMMARY OF THE INCIDENT**

Provide a brief description of what happened, and the concrete measures taken and proposed to be taken to minimize damage to data subjects.

**8. TYPE OF DATA AFFECTED**

Select the types of personal data that have been affected. (select all applicable options)

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- Basic data subject identifiers (name, date of birth, contact details)
- User credentials (user password)
- Images (photo/video)
- National identification number
- Genetic data
- Biometric data
- Data revealing filiation, racial or ethnic origin
- Religious or philosophical beliefs
- Political opinions
- Trade union membership
- Health data (mental or physical)
- Sex life
- Criminal offences
- Financial data
- Other: .....

**9. NUMBER OF DATA SUBJECTS AFFECTED**

In total, how many data subjects were or could be affected by the breach? (If you do not know the exact value, please give an approximate value.)



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**10. CATEGORIES OF DATA SUBJECTS**

What are the categories of data subjects concerned? (*Select all applicable options*)


- Employees
- Customers/Clients or potential customers/clients
- Students
- Patients
- Subscribers
- Suppliers or Contractors
- Minors
- Others: .....

**11. IMPACT ON DATA SUBJECTS**

From the table below indicate:


- the nature of the possible impact of the breach;
- whether there is evidence that any of the impact has occurred; and
- if the impact has not yet occurred, the assessment of the probability of the impact occurring.

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	NATURE OF THE POSSIBLE IMPACT	EVIDENCE THAT THE IMPACT HAS OCCURRED (as at date of this report)	ASSESSMENT OF THE PROBABILITY OF THE IMPACT OCCURRING
(1)	<input type="checkbox"/> Limitation of their rights	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Improbable <input type="checkbox"/> Low <input type="checkbox"/> High <input type="checkbox"/> Very High <input type="checkbox"/> Unknown
(2)	<input type="checkbox"/> Inability to access a service	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Improbable <input type="checkbox"/> Low <input type="checkbox"/> High <input type="checkbox"/> Very High <input type="checkbox"/> Unknown
(3)	<input type="checkbox"/> Identity theft	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Improbable <input type="checkbox"/> Low <input type="checkbox"/> High <input type="checkbox"/> Very High <input type="checkbox"/> Unknown
(4)	<input type="checkbox"/> Phishing/spamming victim	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Improbable <input type="checkbox"/> Low <input type="checkbox"/> High <input type="checkbox"/> Very High <input type="checkbox"/> Unknown
(5)	<input type="checkbox"/> Fraud	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Improbable <input type="checkbox"/> Low <input type="checkbox"/> High <input type="checkbox"/> Very High <input type="checkbox"/> Unknown

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	NATURE OF THE POSSIBLE IMPACT	EVIDENCE THAT THE IMPACT HAS OCCURRED (as at date of this report)	ASSESSMENT OF THE PROBABILITY OF THE IMPACT OCCURRING
(6)	<input type="checkbox"/> Financial loss	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Improbable <input type="checkbox"/> Low <input type="checkbox"/> High <input type="checkbox"/> Very High <input type="checkbox"/> Unknown
(7)	<input type="checkbox"/> Damage to reputation or relationship	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Improbable <input type="checkbox"/> Low <input type="checkbox"/> High <input type="checkbox"/> Very High <input type="checkbox"/> Unknown
(8)	<input type="checkbox"/> Threat to professional secrecy	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Improbable <input type="checkbox"/> Low <input type="checkbox"/> High <input type="checkbox"/> Very High <input type="checkbox"/> Unknown
(9)	<input type="checkbox"/> Humiliation or loss of dignity	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Improbable <input type="checkbox"/> Low <input type="checkbox"/> High <input type="checkbox"/> Very High <input type="checkbox"/> Unknown
(10)	<input type="checkbox"/> Loss of control over their personal data	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Improbable <input type="checkbox"/> Low <input type="checkbox"/> High <input type="checkbox"/> Very High <input type="checkbox"/> Unknown
(11)	<input type="checkbox"/> Discrimination	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Improbable <input type="checkbox"/> Low <input type="checkbox"/> High <input type="checkbox"/> Very High <input type="checkbox"/> Unknown

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	NATURE OF THE POSSIBLE IMPACT	EVIDENCE THAT THE IMPACT HAS OCCURRED (as at date of this report)	ASSESSMENT OF THE PROBABILITY OF THE IMPACT OCCURRING
(12)	<input type="checkbox"/> Damage/ Distress	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Improbable <input type="checkbox"/> Low <input type="checkbox"/> High <input type="checkbox"/> Very High <input type="checkbox"/> Unknown
(13)	<input type="checkbox"/> Injury, Illness or loss of life	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Improbable <input type="checkbox"/> Low <input type="checkbox"/> High <input type="checkbox"/> Very High <input type="checkbox"/> Unknown
(14)	<input type="checkbox"/> Still unknown	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Improbable <input type="checkbox"/> Low <input type="checkbox"/> High <input type="checkbox"/> Very High <input type="checkbox"/> Unknown
(15)	<input type="checkbox"/> Other:  .....	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Improbable <input type="checkbox"/> Low <input type="checkbox"/> High <input type="checkbox"/> Very High <input type="checkbox"/> Unknown

**12. ACTIONS TAKEN BY THE DATA CONTROLLER AFTER THE BREACH**


12.1 Have new security measures been taken after the incident that could have prevented the breach?

- Yes    No    Unknown    Not Applicable

12.2 Have security policies and procedures been adapted or improved?

- Yes    No    Unknown    Not Applicable

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12.3 Where applicable, select only new or updated security measures:

- |   |   |
|---|---|
| <input type="checkbox"/> Data protection and information security policies              | <input type="checkbox"/> Periodic audits          |
| <input type="checkbox"/> Data protection and security training at the appropriate level | <input type="checkbox"/> Physical access control  |
| <input type="checkbox"/> Updated IT systems   | <input type="checkbox"/> Logical access control   |
| <input type="checkbox"/> Incident log   | <input type="checkbox"/> Levels of access to data |
|   | <input type="checkbox"/> Data encryption          |
|   | <input type="checkbox"/> Backup/ Recovery Plan    |
|   | <input type="checkbox"/> Anonymisation            |
|   | <input type="checkbox"/> Other: _____             |

(Specify)

12.4 Has the incident been reported to law enforcement authorities as a criminal offence?

- Yes                       No                       Unknown

12.5 Have all possible actions been taken to resolve the breach?

- Yes                       No                       Unknown

12.6 Has the breach been resolved?

- Yes                       No                       Unknown


12.7 If yes, indicate the date on which the breach was resolved.

**13. NOTIFICATION OF DATA SUBJECTS**

13.1 Have the data subjects whose personal data have been affected by the breach been notified in the terms described in section 21(5) of the Data Protection Act and Regulation 10 of the Data Protection Regulations?

- Yes                       No

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13.2 What means of notification was utilised? (*Select all applicable options*)

- Notification addresses personally to data subject (post, email, SMS, etc.)
- Publication on the data controller’s website or social media pages
- Dissemination in other media
- Other .....

13.3 Where applicable, indicate the date when notification was given to the data subjects.

13.4 Where applicable, indicate the number of data subjects to whom the notification was given.

**14. DELAY IN REPORTING**

If there has been a delay (more than 72 hours after becoming aware of the incident and reporting it to the Information Commissioner), please provide your justifications for the delay.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_