

441-543-7748

[www.privacy.bm](http://www.privacy.bm)

investigations@privacy.bm

Maxwell Roberts Building, 4th Floor 1 Church Street, Hamilton, HM11, Bermuda

**Personal Information Breach Notification Form**

**What is a personal information breach?**

A personal information breach means a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal information. This includes breaches that are the result of both accidental and deliberate causes.

**When do we need to notify individuals about a breach?**

If a personal information breach is likely to adversely affect an individual, PIPA says you must inform the Commissioner and those concerned directly and without undue delay.

**When should notification occur?**

Notification should occur as soon as possible (without undue delay) following a breach.

**How should notification occur?**

The preferred method of notification is by letter or email to the affected individuals.

In scenarios where this is not applicable – website information, posted notices, or social media may be acceptable, however it generally should only happen where “direct” notification could cause further harm, is prohibitive in cost, or contact information is lacking. Using multiple methods of notification in certain cases may be the most effective approach.

For more information, please visit our website: [Breach of security | PrivComBermuda](https://www.privacy.bm/beach-of-security)

**This form is to be used when notifying the Office of the Privacy Commissioner for Bermuda (PrivCom) of a Personal Information Breach (Breach of Security). If a question does not apply to your situation, write "N/A." If you do not know the answer, write "unknown."**

If you have any questions or need assistance completing this notification form, please contact our office

at: 543-7748

Once completed, this notification form can be emailed to: investigations@privacy.bm

**Details**

1. **Organisation Affected:** Click or tap here to enter text.

**Sector:** [ ]  **Finance** [ ]  **Legal** [ ]  **Healthcare**

[ ]  **Other:** Click or tap here to enter text.

1. **Date that the organisation became aware of the breach:**Click or tap to enter a date.
2. **How did you become aware?** Click or tap here to enter text.
3. **Date of the breach**:Click or tap to enter a date.
4. **Approximate time that the breach occurred:** Click or tap here to enter text.
5. **Location of breach**:Click or tap here to enter text.

(For example, what technical system was affected by the breach?)

1. **Describe the personal information breach:**

Click or tap here to enter text.

1. **The estimated number of individuals adversely affected:** Click or tap here to enter text.
2. **The type of individuals who may be affected**:

[ ]  **Client/Customer**

[ ]  **Patient**

[ ]  **Employee**

[ ]  **Student**

[ ]  **Children <14**

[ ]  **Individuals in other jurisdictions**

 **Which Jurisdiction:** Click or tap here to enter text.

[ ]  **Other:** Click or tap here to enter text.

1. **(a) Has your organisation provided notification to all adversely affected individuals?**

 (An organisation must inform the Commissioner and those concerned directly and without undue delay.)

[ ] Yes ***(Please include a copy in your submission to PrivCom)***

[ ] No (***Please explain why notification has not yet occurred)***

 Click or tap here to enter text.

 **(b) If yes, how did you provide notification to the adversely affected individuals?**

 (An organisation must provide notification to any individual adversely affected by the breach)

 Click or tap here to enter text.

 **(c) If no, when do you anticipate notification will be complete?**

 Click or tap to enter a date.

1. **Describe the categories of personal information involved (e.g. name, address, SIN, financial, medical)** (Do not include or send us identifiable personal information)

[ ]  Name [ ]  Date of Birth [ ]  Address [ ]  Medical [ ]  Financial

[ ]  Social Insurance Number [ ]  Biometric [ ] Other:Click or tap here to enter text.

1. [**What is the potential harm caused by the breach?**](https://www.privacy.bm/post/what-s-the-harm-if-personal-information-is-misused)

 Click or tap here to enter text.

1. **Describe your relevant security measures:**

 **Physical security (locks, alarm systems etc.)**

 Click or tap here to enter text.

 **Technical security (Firewalls, encryption, authenticators):**

 Click or tap here to enter text.

**Organisational security (security clearances, policies, role-based access):**

Click or tap here to enter text.

1. **If personal information was used, disclosed, or shared, has the personal information been retrieved to minimize the risk?**

[ ]  **Yes**

Click or tap here to enter text.

[ ]  **No**

Click or tap here to enter text.

[ ] **N/A**

1. **Have any other regulatory bodies been involved? (i.e. Police)**

[ ]  **Yes, which regulator:** Click or tap here to enter text.

[ ]  **No**

**Measures Taken**

1. **Describe the measures taken (or to be taken) to contain and reduce the harm of the breach:** (e.g. locks changed, computer access codes changed or revoked, computer systems shut down)

Click or tap here to enter text.

1. **Describe the measures (or to be taken) to correct the situation**:

(e.g. staff training, policy development, privacy and security audit, contractor supervision strategies, improved technical security architecture, improved physical security)

Click or tap here to enter text.

**Any additional Information**:

Click or tap here to enter text.

 **Privacy Officer:** Click or tap here to enter text.

 **Email:** Click or tap here to enter text.

 **Phone:** Click or tap here to enter text.

|  |
| --- |
| **(FOR INTERNAL USE ONLY)** |
| Date Received: |  |
| Received by: |  |

**PERSONAL INFORMATION BREACH – CHECKLIST**

**FOR INTERNAL ORGANISATIONAL USE**

(Please refer to this checklist when notifying PrivCom)

**We have notified without undue delay:**

[ ]  The Office of the Privacy Commissioner for Bermuda

[ ]  Any individual that has been adversely affected

**Notification to Commissioner - We have used PrivCom’s notification form or emailed them and included the following details:**

[ ]  The name of the organisation involved

[ ]  Privacy Officer details

[ ]  The date, approximate time, and location of the breach

[ ]  The date the organisation became aware of the breach

[ ]  Estimated number of individuals adversely affected

[ ]  The type of individual(s) affected

[ ]  Description of the categories of personal information involved

[ ]  Potential Harm caused by the breach

[ ]  Description of relevant security measures

[ ]  Has the personal information been retrieved (if applicable)

[ ]  Have other regulatory bodies been involved

[ ]  The measures taken (or to be taken) to contain and reduce the harm of the breach

[ ]  The measures taken (or to be taken) to correct the situation

[ ]  Additional information (if applicable)

**Notification to Individual(s) - We have included the following details:**

[ ]  The name and contact details of any data privacy officer you have, or other contact point where

 more information can be obtained

[ ]  Number of individuals adversely affected

[ ]  Type of individuals affected (Client, Customer, Employee, Student, Children, Other)

[ ]  A description of the likely consequences of the personal information breach; and

[ ]  Adescription of the measures taken or proposed to deal with the Personal Information Breach

 and, where appropriate, a description of the measures taken to mitigate any possible adverse

 effects.

[ ]  Steps the affected individual(s) can take to further mitigate the risk