

Data Breach Response Policy for Adam Smith Magician

Organisation: Adam Smith Magician

Effective Date: 09/06/2026

Review Date: 09/06/2027

1. Purpose

This Data Breach Response Policy establishes the procedures for identifying, reporting, assessing, managing, and responding to personal data breaches.

The purpose of this policy is to:

- **Protect individuals whose personal information is processed by the organisation.**
- **Minimise the impact of data breaches.**
- **Ensure compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.**
- **Provide a clear and consistent response process.**

2. Scope

This policy applies to:

- **Employees**
- **Contractors**
- **Volunteers**
- **Consultants**
- **Temporary staff**
- **Third-party service providers acting on behalf of the organisation**

It applies to all personal data processed by the organisation in electronic, paper, audio, video, and other formats.

3. Definition of a Personal Data Breach

A personal data breach is a security incident that results in:

- **Accidental or unlawful destruction of personal data**
- **Loss of personal data**
- **Alteration of personal data**
- **Unauthorised disclosure of personal data**
- **Unauthorised access to personal data**

Examples include:

- **Sending personal information to the wrong person**
- **Loss or theft of devices containing personal data**
- **Unauthorised access to systems**
- **Website or database compromise**
- **Email misdirection**
- **Malware or ransomware attacks**

4. Reporting a Suspected Breach

All staff and representatives must immediately report any actual or suspected data breach.

Reports should include:

- **Date and time discovered**
- **Description of the incident**
- **Type of information involved**
- **Number of individuals affected (if known)**
- **Actions already taken**

Reports should be made without delay to:

Data Protection Officer / Privacy Contact

Name: Jax Smith

Email: info@adams-magic.co.uk

Telephone: 07469 241 313

5. Initial Response

Upon receiving a report, the organisation will:

- 1. Confirm the breach has occurred.**
- 2. Contain the incident where possible.**
- 3. Prevent further loss or disclosure.**
- 4. Preserve evidence.**
- 5. Begin an initial assessment.**

Containment measures may include:

- **Disabling compromised accounts**
- **Resetting passwords**
- **Restricting system access**
- **Isolating affected systems**
- **Recovering lost information**

6. Risk Assessment

The organisation will assess:

- **The type of personal data involved.**
- **The sensitivity of the information.**
- **The number of individuals affected.**
- **The likelihood of harm.**
- **The severity of potential consequences.**

Potential risks may include:

- **Identity theft**
- **Fraud**
- **Financial loss**
- **Reputational damage**
- **Loss of confidentiality**
- **Discrimination**

7. Notification to the Information Commissioner's Office (ICO)

Where a personal data breach is likely to result in a risk to the rights and freedoms of individuals, the organisation will notify the Information Commissioner's Office (ICO) without undue delay and, where feasible, within 72 hours of becoming aware of the breach.

If notification is delayed, the reasons for the delay will be documented.

8. Notification to Affected Individuals

Where a breach is likely to result in a high risk to individuals, affected persons will be informed without undue delay.

Notifications may include:

- **Description of the breach**
- **Likely consequences**
- **Measures taken to address the breach**
- **Recommended actions for affected individuals**
- **Contact details for further information**

9. Breach Documentation

All data breaches, regardless of severity, will be documented.

Records will include:

- **Nature of the breach**
- **Date and time of occurrence**
- **Assessment findings**
- **Decisions made**
- **Notifications issued**
- **Corrective actions taken**

These records will be retained in accordance with the organisation's Data Retention Policy.

10. Investigation and Corrective Action

Following a breach, the organisation will:

- **Investigate the root cause**
- **Review existing controls**
- **Implement corrective measures**
- **Update procedures where necessary**
- **Provide additional training if required**

Corrective actions may include:

- **System updates**
- **Security enhancements**
- **Policy revisions**
- **Process improvements**

11. Responsibilities

Management

Management is responsible for:

- **Ensuring adequate resources are available for incident response.**
- **Supporting investigations.**
- **Ensuring compliance with legal obligations.**

Staff and Representatives

Individuals handling personal data must:

- **Follow security procedures.**
- **Report incidents immediately.**
- **Cooperate with investigations.**
- **Participate in training where required.**

12. Training and Awareness

The organisation will provide appropriate training and awareness activities to help personnel:

- **Recognise data breaches.**
- **Understand reporting procedures.**
- **Follow incident response requirements.**
- **Protect personal information.**

13. Review and Monitoring

This policy will be reviewed annually or sooner if:

- **Legislation changes.**
- **Regulatory guidance changes.**
- **Significant incidents occur.**
- **Operational requirements change.**

14. Contact Information

Questions regarding this policy or reports of suspected data breaches should be directed to:

Data Protection Officer / Privacy Contact

Name: Jax Smith

Email: info@adams-magic.co.uk

Telephone: 07469 241 313