

## Data Sheet

### *How to use the data breach register?*

The purpose of this data sheet is to explain how this Excel file can be used and what its various functions are.

This template enables you to document the facts of the breach, its effects and the measures taken to remedy it, as well as your compliance with your obligations towards both the APDP and the affected individuals.

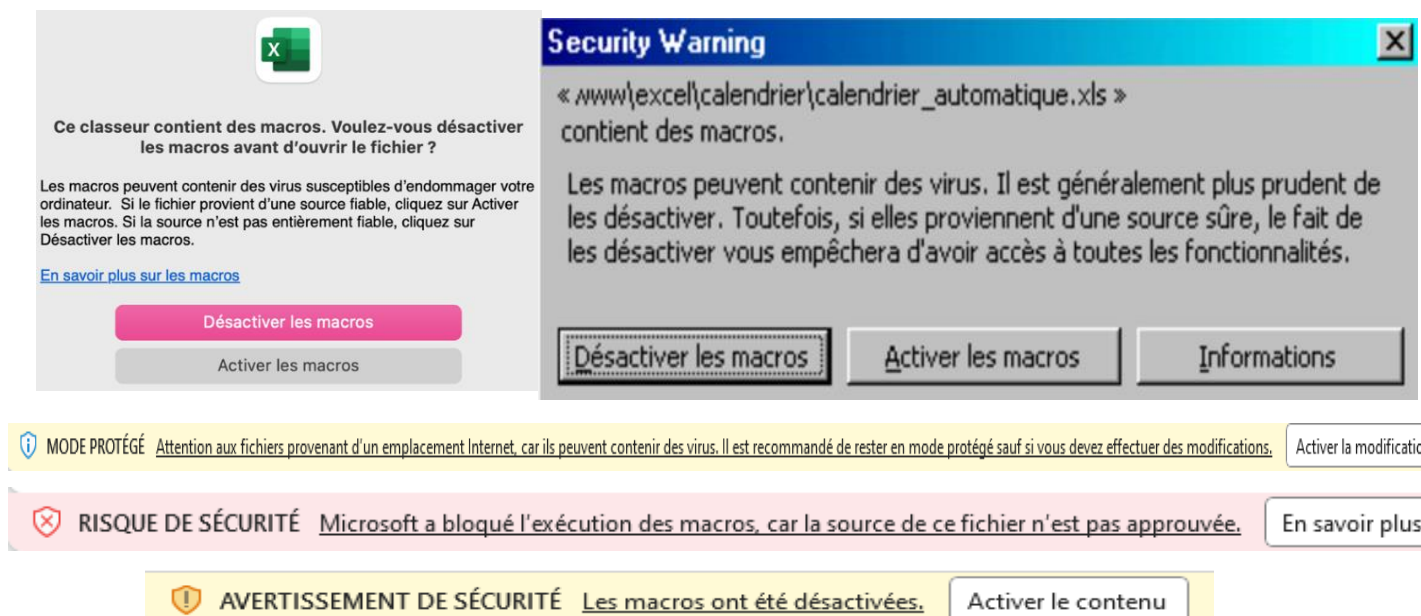
### *Why activate the macros on the Excel file?*

To ensure that your Excel file works properly, it is essential to activate the macros. Macros are used to automate certain tasks and ensure that the built-in functions run correctly.

### *How to activate the macros on the different versions of Excel?*

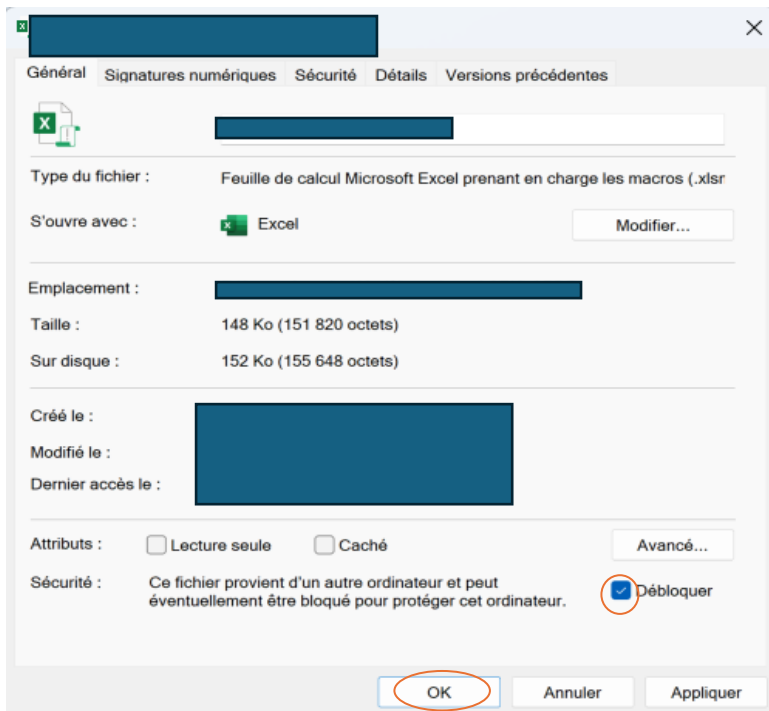
This type of message may be displayed depending on the version of Excel used and the type of device used.

It is important to activate the macros in order to benefit fully from the functionality of the data breach register.



This file comes from a reliable and verified source. You can activate them in complete safety.

If this type of message does not appear, depending on your version of Excel, you can activate the macros directly in the file.



To activate the macros :

- Right-click on the saved file
- Click on « *Propriétés* » (Properties) and check that you are in the « *Général* » (General) tab.
- Tick the « *Débloquer* » (Unblock) box.
- To confirm, click on « *OK* ».

### IMPORTANT

For information purposes, this file is protected in order to ensure the proper functioning of the data breach register.

However, you can remove this protection to adapt it to your needs. Just make sure that you do not insert any columns or rows and that you do not change the overall structure of the file. Insert rows to add information using the button provided.

For information, the Excel version used to create this file is 2021.

Finally, it is important to be careful about copying and pasting. When using the right-click function, it is necessary to select the option that respects the formatting in the paste options in order to avoid layout problems.

## STEP 1: Registering personal data breaches

### REGISTRE DES VIOLATIONS DE DONNEES PERSONNELLES

Besoin d'aide ?

Imprimer

The « **Besoin d'aide ?** » (**Need help ?**) button at the top right of the file allows you to access at any time the section of the APDP website dedicated to the data breach register, and in particular the factsheets.

The boxes are colour-coded to reflect different themes:

1. Grey: internal management and chronology of the breach
2. Dark blue: nature of the breach
3. Green: data affected by the breach
4. Orange: persons affected by the breach
5. Light blue: consequences of the breach
6. Yellow: technical and organisational measures related to the breach
7. Pink: notification(s) of the breach to the APDP and possibly to other authorities
8. Purple: information of the persons affected

#### 1. Internal management and chronology of the breach

| Référence | Statut de la violation | Date et heure du début de la violation | Date et heure de constatation de la violation | Date et heure de fin de la violation |
|-----------|------------------------|----------------------------------------|-----------------------------------------------|--------------------------------------|
|           |                        |                                        |                                               |                                      |
|           |                        |                                        |                                               |                                      |
|           |                        |                                        |                                               |                                      |

In the « **Référence** » (**Reference**) field (free field), insert the reference/internal identification number assigned to the data breach. This reference will facilitate the organisation and subsequent management of breaches

In the « **Statut de la violation** » (**status of the breach**) field, select the appropriate option from the drop-down menu.

**Statut de la violation**

Simplement détectée

En cours de traitement

Traitée

In the « **Date et heure du début de la violation** » (**Date and time of start of the breach**), « **Date et heure de constatation de la violation** » (**Date and time of detection of the breach**) and « **Date et heure de fin de la violation** » (**Date and time of end of the breach**) (free fields), enter the time information relating to the breach in the desired format.

#### Examples :

- 20/05/2025 at 12 :00 noon
- 20.05.25 at 12 noon
- 20 May 2025 at 12 noon
- 20/05/25 – 12h

## 2. Nature of the breach

| <u>Cause de la violation</u> | <u>Qualification de la violation</u> | <u>Nature de la violation</u> | <u>Description de la violation</u> |
|------------------------------|--------------------------------------|-------------------------------|------------------------------------|
|                              |                                      |                               |                                    |
|                              |                                      |                               |                                    |
|                              |                                      |                               |                                    |

In the « ***Cause de la violation*** » (**Cause of breach**) field, select the appropriate option from the drop-down menu.

| <u>Cause de la violation</u> |
|------------------------------|
| Interne                      |
| Externe                      |
| Non connue                   |

| <u>Qualification de la violation</u> |
|--------------------------------------|
| Accidentelle                         |
| Intentionnelle                       |
| Non connue                           |

In the « ***Qualification de la violation*** » (**Qualification of the breach**) field, select the appropriate option from the drop-down menu.

| <u>Nature de la violation</u>       |
|-------------------------------------|
| Accès non autorisé                  |
| Divulgarion non autorisée           |
| Perte de données personnelles       |
| Vol de données personnelles         |
| Altération de données personnelles  |
| Destruction de données personnelles |
| Autres :                            |

In the « ***Nature de la violation*** » (**Nature of the breach**) field, select the appropriate option(s) from the drop-down menu.

In the « ***Description de la violation*** » (**Description of the breach**) field (free field), describe the facts of the data breach.

## 3. Data affected by the breach

| <u>Catégorie(s) de données concernées</u> | <u>Données sensibles ?</u> | <u>Catégorie(s) de données sensibles, si applicable</u> |
|-------------------------------------------|----------------------------|---------------------------------------------------------|
|                                           |                            |                                                         |
|                                           |                            |                                                         |
|                                           |                            |                                                         |

In the « **Catégorie(s) de données concernées** » field, select the appropriate option(s) from the drop-down menu.

Catégorie(s) de données concernées

Identité/situation de famille  
Adresses et coordonnées  
Formation, diplômes, vie professionnelle  
Caractéristiques financières  
Copies de documents officiels  
Habitudes de vie et de consommation  
Données physiques  
Données d'identification électronique

Données sensibles ?

OUI  
NON

In the « **Données sensibles ?** », (Sensitive data?) field, select OUI (YES) or NON (NO) from the drop-down menu.

Données sensibles ?

OUI  
NON  
OUI  
NON

If selected, OUI (YES) will appear in red.  
If selected, NON (NO) will appear in green.

Catégorie(s) de données sensibles, si applicable

Opinions ou appartenances politiques  
Origines raciales ou ethniques  
Convictions religieuses  
Convictions philosophiques  
Appartenance syndicale  
Données génétiques  
Données biométriques  
Données concernant la santé

If you answered **OUI (YES)** in the « **Données sensibles ?** » (Sensitive data) field, select the appropriate option(s) from the drop-down menu in the « **Catégorie(s) de données sensibles, si applicable** » (Category(ies) of sensitive data, if applicable) field.

4. Persons affected by the breach

| Catégorie(s) de personne(s) concernées | Nombre de personnes concernées |
|----------------------------------------|--------------------------------|
|                                        |                                |
|                                        |                                |
|                                        |                                |
|                                        |                                |

| Catégorie(s) de personne(s) concernée(s) |
|------------------------------------------|
| Salariés                                 |
| Clients                                  |
| Prospects                                |
| Prestataires                             |
| Fournisseurs                             |
| Patients                                 |
| Mineurs                                  |

In the « **Catégorie(s) de personne(s) concernée(s)** » (**Category(ies) of persons affected**) field, select the appropriate option(s) from the drop-down menu.

In the « **Nombre de personnes concernées** » (**Number of persons affected**) field (free field), enter the number of people affected by this data breach or, failing that, an estimate.

## 5. Consequences of the breach

| Classification / Impact de la violation | Effet(s) / Conséquence(s) de la violation | Degré du risque pour les personnes concernées |
|-----------------------------------------|-------------------------------------------|-----------------------------------------------|
|                                         |                                           |                                               |
|                                         |                                           |                                               |

In the « **Classification/Impact de la violation** » (**Classification/Impact of the breach**) field, select the appropriate option(s) from the drop-down menu.

| Classification / Impact de la violation |
|-----------------------------------------|
| Violation de la confidentialité         |
| Violation de l'intégrité                |
| Violation de la disponibilité           |

In the « **Effets/Conséquence(s) de la violation** » (**Effects/Consequence(s) of the breach**) field (free field), indicate any effects and/or consequences of the data breach for the persons affected.

| Degré du risque pour les personnes concernées |
|-----------------------------------------------|
| Aucun risque                                  |
| Risque faible                                 |
| Risque moyen                                  |
| Risque élevé                                  |

In the « **Degré du risque pour les personnes concernées** » (**Degree of risk for the persons affected**) field, select the appropriate option from the drop-down menu.

The risk will then be colour-coded: green (no risk), yellow (low risk), orange (medium risk), red (high risk).

| Degré du risque pour les personnes concernées |
|-----------------------------------------------|
| Risque faible                                 |
| Aucun risque                                  |
| Risque moyen                                  |
| Risque élevé                                  |

## 6. Measures related to the breach

| Mesures techniques et organisationnelles mises en place avant la violation | Mesures techniques et organisationnelles prises pour limiter l'impact de la violation | Mesures techniques et organisationnelles prises pour éviter que la violation ne se reproduise |
|----------------------------------------------------------------------------|---------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|
|                                                                            |                                                                                       |                                                                                               |
|                                                                            |                                                                                       |                                                                                               |
|                                                                            |                                                                                       |                                                                                               |
|                                                                            |                                                                                       |                                                                                               |
|                                                                            |                                                                                       |                                                                                               |
|                                                                            |                                                                                       |                                                                                               |
|                                                                            |                                                                                       |                                                                                               |

These three free fields allow you to indicate the various technical and organisational measures put in place before and after the breach for corrective and preventive purposes.

(For examples of measures to put in place before and/or after a breach, see our factsheet **Security measures: questions to ask yourself to ensure good IT hygiene**)

## 7. Notification(s) to the APDP and possibly to other authorities

| Notification à l'APDP | Date et justification pour notification au-delà des 72h, si applicable | Retour de l'APDP | Notification à d'autres autorités |
|-----------------------|------------------------------------------------------------------------|------------------|-----------------------------------|
| NON                   |                                                                        |                  |                                   |
| OUI                   |                                                                        |                  |                                   |
| NON                   |                                                                        |                  |                                   |
| OUI                   |                                                                        |                  |                                   |
|                       |                                                                        |                  |                                   |
|                       |                                                                        |                  |                                   |
|                       |                                                                        |                  |                                   |
|                       |                                                                        |                  |                                   |
|                       |                                                                        |                  |                                   |
|                       |                                                                        |                  |                                   |

The « **Notification à l'APDP** » (Notification to the APDP) field is automatically filled in if you have selected a risk in the « **Degré du risque pour les personnes concernées** » (Degree of risk for the persons concerned) column.

If you have selected « **Aucun risque** » (No risk), NON (NO) appears in red.

If you have selected, « **Risque faible** » (Low risk), « **Risque moyen** » (Medium risk) or « **Risque élevé** » (High risk) , OUI (YES) appears in green.

If you have not selected a risk in the « **Degré du risque pour les personnes concernées** » (Degree of risk for the persons concerned) field, this field is empty.

Then select from the drop-down menu OUI (YES) or NON (NO).

Notification à l'APDP

OUI

NON

NON

OUI

Notification à l'APDP

OUI

NON

In the « **Date et justification pour notification au-delà des 72h, si applicable** » ( Date and reason for notification beyond 72 hours) field (free field), enter the date in the desired format and specify the reason(s) why you were unable to notify the Data Protection Authority of the breach within the time period stipulated by the Law.

In the « **Retour de l'APDP** » (**Feedback from the APDP**) field (free field), enter any comments or requests made by the Data Protection Authority following the notification.

In the « **Notification à d'autres autorités** » (**Notification to other authorities**) (free field), indicate whether the breach has been notified to other authorities (data protection authorities (e.g. CNIL) or other authorities in order to comply with a legal obligation (e.g. AMSF)).

## 8. Information of the persons affected

| Communication à la ou les personne(s) concernée(s) | Justification(s) de la communication ou de l'absence de communication | Mode et date de la communication aux personnes concernées | Retour de la ou les personne(s) concernée(s) |
|----------------------------------------------------|-----------------------------------------------------------------------|-----------------------------------------------------------|----------------------------------------------|
|                                                    |                                                                       |                                                           |                                              |
|                                                    |                                                                       |                                                           |                                              |
|                                                    |                                                                       |                                                           |                                              |

In the « **Communication à la ou les personne(s) concernée(s)** » (**Communication to the person(s) concerned**) field, select OUI (YES) or NON (NO) from the drop-down menu.

If selected, OUI (YES) will appear in green.

If selected, NON (NO) will appear in red.

The diagram illustrates the 'Communication à la ou les personne(s) concernée(s)' field. It shows two instances of the dropdown menu. In the first instance, the menu is open, showing 'OUI' and 'NON' as selectable options. In the second instance, the menu is open, and 'OUI' is highlighted in green, while 'NON' is highlighted in red, indicating the visual feedback for each selection.

In the « **Justification(s) de la communication ou de l'absence de communication** » (**Justification(s) for communicating or not communicating**) field (free field), enter any reasons for choosing to communicate or not to communicate the breach to the data subjects (for example: despite the high risk, the subsequent measures taken ensure that the risk is no longer likely to materialise).

In the « **Mode et date de la communication aux personnes concernées** » (**Method and date of communication to the persons affected**) field (free field), enter the chosen method of communication (e.g. post) and the date of this communication.

In the « **Retour de la ou les personne(s) concernée(s)** » (**Feedback from the person(s) affected**) field (free field), enter any comments or requests made by the person(s) concerned following this communication.

Finally, if necessary, in the « **Informations complémentaires/ Commentaires / Documents** » (**Additional information/Comments/Documents**) field (free field), enter all the information needed to certify compliance with the Law and to build up a file of evidence.

The diagram shows the 'Informations complémentaires / Commentaires / Documents' field. It is a rectangular box with a grey header containing the text 'Informations complémentaires / Commentaires / Documents' and a small downward arrow on the right. Below the header are several horizontal lines representing the free text area.

## **STEP 2 : Adding data breaches in the Excel file**

**Version 1.0**

## REGISTRE DES VIOLATIONS DE DONNEES PERSONNELLES

[Besoin d'aide ?](#)  
[Imprimer](#)

| Référence | Statut de la violation | Date et heure du début de la violation | Date et heure de constatation de la violation | Date et heure de fin de la violation | Cause de la violation | Qualification de la violation |
|-----------|------------------------|----------------------------------------|-----------------------------------------------|--------------------------------------|-----------------------|-------------------------------|
|           |                        |                                        |                                               |                                      |                       |                               |
|           |                        |                                        |                                               |                                      |                       |                               |
|           |                        |                                        |                                               |                                      |                       |                               |
|           |                        |                                        |                                               |                                      |                       |                               |
|           |                        |                                        |                                               |                                      |                       |                               |

Ajouter une violation de données

Click on this button to add a data breach.

An additional line will then appear, while retaining the layout of the Excel file.

### **STEP 3 : Sorting through personal data breaches**

Version 1.0

REGISTRE DES VIOLATIONS DE DONNEES PERSONNELLES

Besoin d'aide ?

Imprimer

| Référence | Statut de la violation | Date et heure du début de la violation | Date et heure de constatation de la violation | Date et heure de fin de la violation | Cause de la violation | Qualification de la violation |
|-----------|------------------------|----------------------------------------|-----------------------------------------------|--------------------------------------|-----------------------|-------------------------------|
|           |                        |                                        |                                               |                                      |                       |                               |
|           |                        |                                        |                                               |                                      |                       |                               |
|           |                        |                                        |                                               |                                      |                       |                               |

Ajouter une violation de données

For example :

**Filtres**

Rechercher

- ☒ (Sélectionner tout)
- ☒ En cours de traitement
- ☒ Simplement détectée
- ☒ Traitée

OK Annuler

Click on the down arrow in the service box.

You can sort by :

- ⇒ From A to Z
- ⇒ From Z to A
- ⇒ By colour
- ⇒ By clicking

To display only certain criteria (e.g. breaches currently being processed), simply select the required box from the list and click OK.

☐ (Sélectionner tout)  
☒ En cours de traitement  
☐ Simplement détectée  
☐ Traitée

OK Annuler

Only the breaches that are « *en cours de traitement* » (in progress) will now appear.



| Statut de la violation |
|------------------------|
| En cours de traitement |
| En cours de traitement |
| En cours de traitement |

#### STEP 4 : Printing out the data breach register

| Version 1.0                      | REGISTRE DES VIOLATIONS DE DONNEES PERSONNELLES |                                        |                                               |                                      |                       | Besoin d'aide ?               |
|----------------------------------|-------------------------------------------------|----------------------------------------|-----------------------------------------------|--------------------------------------|-----------------------|-------------------------------|
|                                  |                                                 |                                        |                                               |                                      |                       | Imprimer                      |
| Référence                        | Statut de la violation                          | Date et heure du début de la violation | Date et heure de constatation de la violation | Date et heure de fin de la violation | Cause de la violation | Qualification de la violation |
|                                  |                                                 |                                        |                                               |                                      |                       |                               |
|                                  |                                                 |                                        |                                               |                                      |                       |                               |
|                                  |                                                 |                                        |                                               |                                      |                       |                               |
|                                  |                                                 |                                        |                                               |                                      |                       |                               |
| Ajouter une violation de données |                                                 |                                        |                                               |                                      |                       |                               |

Imprimer

If you want to print this page, click on the « *Imprimer* » (Print) button at the top right of the file.