Draft initial notification and framed follow-up

LINDBERGH FORMATION — 16 rue de Maillé, 91310 Montlhéry, France · Companies register (RCS) Evry 817 946 114

Document issued on 09/11/2026

Maison Aurore · incident AUR-INC-2026-002 · fictional document — NOT TRANSMITTED

Fictional document — demonstration example

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Fictional document, and NOT TRANSMITTED. This draft is waiting for the controller's signature. The agent has no means of sending anything to a supervisory authority: the demonstration performs no external write.

Why notify now, without knowing everything

Article 33(4) GDPR provides that “where, and in so far as, it is not possible to provide the information at the same time, the information may be provided in phases without undue further delay”. Waiting for the outcome of the provider's investigation would let the 72-hour deadline run without bringing the authority anything.

Initial notification — proposed content

Heading	Proposed content	Status

Nature of the breach	Unauthorised access to a processor's servers, followed by the export of delivery files	**Established fact**
Categories of data	Name, postal address, telephone number — in clear	**Established fact**
Categories of people	Customers who received a delivery over the period	**Established fact**
Number of people concerned	Not determined at this stage, investigation under way	**Declared unknown**
Likely consequences	Unwanted solicitation, targeted phishing attempts by post or telephone	**An assessment, presented as such**
Measures taken	Access cut off on 05/09, the provider's accounts reset, scope frozen, logs preserved	**Established fact**
Contact point details	Privacy officer of Maison Aurore	**To be confirmed**

Follow-up already framed

Element awaited	Origin	What triggers the follow-up
Exact number of people concerned	The provider's investigation	Delivery of the investigation report
Origin of the access	The provider's investigation	Same
Decision on communication to data subjects	Controller	Ruling on high risk (Art. 34(1))

Internal register of breaches

Article 33(5) GDPR requires every breach to be documented “comprising the facts relating to the personal data breach, its effects and the remedial action taken”. The

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corresponding register entry is written and dated, **whether or not the notification is ultimately transmitted**: that documentation duty does not depend on the decision to notify.

> **What this document does not do, and cannot do:** it does not notify. **Article 33 GDPR** makes notification an act of the controller. This is not a limitation of the tool, it is a signature nobody can delegate — and the file that precedes it is complete and handed to you at D+1 of three.

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> https://bluelemonagent.ai/en/entreprises/cas-usage/agent-droits-rgpd-violations

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