Personal data breach — assessment file and draft notification

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

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Vireval · satisfaction survey supplier · fictional document

> **Fictional document — demonstration example**
> This document is produced by the Blue Lemon Agent website to illustrate what an AI agent hands to its users. The companies, matters, amounts and people in it are invented. It has no legal, accounting or commercial value.

> **Fictional document**, produced for the demonstration. The incident, the supplier and the people concerned are invented. The deadline applied is that of **Article 33 of the GDPR**; informing the individuals falls under **Article 34** (cnil.fr, « les violations de données personnelles »).

The clock

Item	Value
Vireval became aware of the breach	**19/08/2026 at 07:40** — supplier email
Deadline for notifying the CNIL	**22/08/2026 at 07:40** — « as early as possible and within a maximum of 72 hours » (Article 33 of the GDPR)
Starting point	**Awareness of the breach, not its occurrence**
State of the file	Draft notification written — **awaiting signature**

Reconstructed timeline

Date	Fact	Source
03/08/2026	Production backup copied to the test environment	Supplier logs, line 4412
03/08 → 18/08	**Test environment accessible without authentication**	Supplier logs, configuration of 03/08
11/08/2026	Two accesses from a single external address, no bulk download observed	Supplier logs, lines 5108 and 5109
18/08/2026	Access closed by the supplier	Supplier email of 19/08
19/08/2026 · 07:40	**Vireval informed**	Supplier email

Scope

Data	People	Present?
First and last name	**4,100**	**Yes**
Email address	**4,100**	**Yes**
Phone number	**1,260**	**Yes**
Survey answers	4,100	Yes
Payment data	—	**No**
Passwords	—	**No**
Special category data (Article 9 of the GDPR)	—	**No**

Assessment of the risk to individuals

Factor	Direction	Weight
Directly contactable data (address, phone)	**Aggravating**	Strong

Factor	Direction	Weight
Exposure lasting 15 days	**Aggravating**	Strong
Membership of the file reveals the person is a customer of the chain	**Aggravating**	Medium
No passwords, no banking data, no special category data	Mitigating	Strong
Only two accesses, no bulk download observed	Mitigating	Medium

> **Reasoned opinion: inform the individuals.** The concrete risk is targeted phishing — a message quoting the customer's name and the chain is far more convincing than an anonymous one. Information is precisely what defuses it. **Article 34 of the GDPR requires communication to individuals where the risk is high; the decision and the signature belong to the controller.**

Message to the individuals concerned — draft

« Dear customer, a supplier to whom we entrust our satisfaction surveys informed us on 19 August 2026 that one of its technical environments had been accessible without a password between 3 and 18 August. Your name, your email address and, for some of you, your phone number may have been consulted there. No banking data and no passwords were held in that environment. »

« What we recommend: if you receive a message presented as coming from our chain and asking you for a payment, a password or an identity document, do not reply and report it to us. We never ask for those by email or SMS. You can reach our data protection officer at the address below, and you have the right to lodge a complaint with the CNIL. »

Entry in the breach register

Article 33 of the GDPR requires every breach to be documented in an internal register, **including those that are not notified**. The entry is drafted: facts, effects, measures taken, and the reasoning that led to the decision to notify or not. It is what will make it possible, in two years' time, to explain why that decision was taken.

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Notification to the CNIL signed on _____ at _____ by _____

Information to individuals: decided / set aside, reason _____

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This document is a fictitious example. To see the agent work on your own documents, request a demo from its page.

https://bluelemonagent.ai/en/entreprises/cas-usage/agent-ia-dpo-rgpd

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