DANISH HEALTH DATA AUTHORITY

Sundhedsdatastyrelsen
Ørestads Boulevard 5
DK-2300 København S

T: +45 7221 6800
E: kontakt@sundhedsdata.dk
W: sundhedsdata.dk

CVR: 33257872
EAN: 5798000363038n

02 July 2026
Case no. 26/04798

European Data Protection Board

# Input to consultation over template for personal data breach notification

The European Data Protection Board (EDPB) has published a public consultation over a new template for personal data breach notification. The template is designed to be implemented by the data protection authorities (DPAs) via an IT tool.

On this occasion, The Danish Health Data Authority has the following remarks:

**1.** Overall, the notification template in its present form will significantly increase the amount of information to be provided to the DPA in connection with the notification of a personal data breach. This entails much more detailed descriptions than those currently used in the Danish DPA's notification system. At the same time, answering the extensive questions seems to be mandatory.

If introduced in its current form, using this template will require considerable additional work for the data controllers. This is even in circumstances where the data controller reports the breach under significant time pressure due to the deadlines in the General Data Protection Regulation.

The Danish Health Data Authority therefore calls on the EDPB to keep the amount of information to be provided at a lower level which will adequately meet the needs of the DPAs in most cases. If, in an individual breach case, the DPA needs more detailed information, it has the possibility, as at present, of requesting additional information.

The Regulation does not require data controllers to submit the notifications to the DPAs in a specific solution. With the suggested form, it would be likely that controllers choose not to use the DPA's solution and instead use an individual notification form. The notification is of course going to provide the information that, according to Article 33(3) of the Regulation, must be included in a notification of a personal data breach.

**2.** The answer options to some of the questions in the present proposal include the option "To be determined". However, that is not the case for several of the questions.

Data controllers often must submit a preliminary notification that are followed up with further information when the details of the breach have been clarified.

The Danish Health Data Authority therefore encourages that the answer option "To be determined" is included in the answers to all questions regarding the description of the breach and the measures etc.

**3.** Question 25 of the template requires information on the "National identification number" of the person making the notification.

National identification numbers are covered by a high level of protection in Denmark and are regarded as confidential. The rules on the processing of this kind of data are laid down in national law, cf. Article 87 of the General Data Protection Regulation.

This is an information that the data controller's employees use primarily as private individuals. Employees are generally not asked to use their personal identification number as part of the performance of work tasks.

Furthermore, there is no need for a DPA to receive this personal information about the controller's employee as part of a notification of a data breach.

The Danish Health Data Authority therefore requests that the information be deleted from the form.

Kind regards

**Lena Andersen Salin**
Senior Consultant
Legal and Compliance
T: +45 21 44 94 51
E: leasa@sundhedsdata.dk