



631.183.3

Berlin, 5 August 2020

535.1479
A56ID 109234
CR 129278
DD 129284
FD 142719

Final Decision

1. Facts concerning the data breach

- **Controller:** Applause GmbH
- **Incident:** Publication of a document on the online platform Trello
- **Date of occurrence:** unknown
- **Date of acknowledgement of the incident:** 16 January 2020
- **EU/EEA Member States concerned, with the number of affected data subjects:** 257 affected data subjects in 27 Member States and Gibraltar
 - o Austria: 3
 - o Belgium: 2
 - o Bulgaria: 2
 - o Croatia: 2
 - o Czech Republic: 5
 - o Denmark: 3
 - o Finland: 8
 - o France: 23
 - o Germany: 26
 - o Gibraltar: 1
 - o Greece: 11
 - o Hungary: 2
 - o Ireland: 6
 - o Italy: 22
 - o Lithuania: 1
 - o Luxembourg: 1
 - o Latvia: 1
 - o Netherlands: 9
 - o Norway: 1
 - o Poland: 17
 - o Portugal: 6
 - o Romania: 3
 - o Slovenia: 2
 - o Slovakia: 1
 - o Spain: 29
 - o Sweden: 2
 - o United Kingdom: 68
- **Category of data subjects:** people participating in a company project as testers

Berlin Commissioner for Data Protection and Freedom of Information

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- **Category of the data types/data records concerned:** first name, last name, e-mail addresses
- **Likely consequences of the violation of the protection of personal data:** misuse of data

2. Description of the data breach from a technical-organizational perspective

Due to human error, a document with personal data was published on a digital platform (Trello). In addition, the entry was made publicly accessible on the web by the responsible user (set to public instead of private, which probably means restricted to a certain user group).

This was not a technical error.

3. Description and analysis of the effectiveness of the measures taken to address the personal data breach or to mitigate its adverse effects (Art. 33 (3) (d) GDPR)

Both the document and the entry were deleted. Employees were once again reminded that the use of this online platform is not permitted within the company.

4. Communication to the data subjects concerned or public communication (Art. 34(1) or Art. 34(3) (c) GDPR)

The data subjects concerned were informed in writing on 21 January 2020 (in German, English and French).

5. Technical and organisational security measures that the controller had already taken when the incident occurred, e.g. encryption (Article 34 (3) (a) GDPR)

This was not a technical error.

6. Subsequent measures by which the controller has ensured that a high risk to the data subjects concerned is no longer likely to materialise (Article 34 (3) (b) GDPR)

This does not constitute a technical error. For organisational measures, see point 3 above.

7. Intended measures by the LSA Berlin DPA

In the light of the above-mentioned considerations regarding Articles 33, 34 GDPR, the Berlin DPA closes the case.

Furthermore, the Berlin DPA has not identified any data protection violations.