FRANCE ASSUREURS
MOVE SOCIETY FORWARD CONFIDENTLY

POSITION PAPER

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France Assureurs is the common name of the Fédération Française de l'Assurance (French Insurance Federation)
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FRANCE ASSUREURS COMMENTS ON EDPB TEMPLATE FOR DATA BREACH NOTIFICATION

France Assureurs welcomes the EDPB's initiative to develop a common template for personal data breach notification under the GDPR. A harmonised template has the potential to enhance consistency across supervisory authorities, improve legal certainty and facilitate a more efficient handling of personal data breach notification.

The proposed template appears more precise and nuanced than the notification form currently in use. However, France Assureurs would like to make the following observations:

- Reassess the necessity of certain information requirements. France Assureurs encourages the EDPB to reassess the necessity of some information requested in the template. Certain sections could be simplified where the requested information does not materially contribute to the assessment of the incident, and some fields should be made optional where appropriate.

- Facilitate the reporting of multiple similar breaches. France Assureurs encourages the EDPB to explore whether the template could support the notification or management of multiple substantially similar personal data breaches through a streamlined or bulk-reporting mechanism, where appropriate. Such an approach would reduce the administrative burden on organisations while preserving the effectiveness of supervisory oversight.

- Ensure sufficient flexibility for practical implementation. France Assureurs calls for the template to provide sufficient flexibility to reflect the practical realities of incident response. In particular, data controllers should be able to submit an initial notification within the 72 hours deadline on the basis of information reasonably available at that stage and subsequently supplement it through follow-up notification. In many cases, personal data breaches require extensive technical investigations before reliable and complete information can be established.

More broadly, the European regulatory framework for digital matters is based on several legislative instruments, including the GDPR, DORA, and the AI Act. While these frameworks pursue broadly aligned objectives, particularly in relation to resilience, cybersecurity, and data protection, each establishes its own incident notification obligations. As a result, organisations will be required to notify the same incident under multiple legal frameworks, using different formats, deadlines, and reporting channels, and to different competent authorities.

In this context, France Assureurs calls for greater harmonisation of the European framework governing incident notifications. France Assureurs welcomes the work currently being undertaken in the context of the Digital Omnibus initiative, as well as the Council's proposal to entrust ENISA, in coordination with the competent authorities, with the task of harmonising incident notification templates.