

Requirements in the United Kingdom

Who needs to report?	What needs to be reported?	By when?	By whom?
UK General Data Protection Regulation (UK GDPR) (Articles 33 and 34)			
Data controllers	Personal data breaches unless unlikely to result in a risk to the rights and freedoms of individuals	Without undue delay and, where feasible, no later than 72 hours after becoming aware	Information Commissioner's Office (ICO)
	Personal data breaches that are likely to result in a high risk to the rights and freedoms of individuals	Without undue delay	Data subjects
Privacy and Electronic Communications Regulations (PECR) (5A)			
Providers of public electronic communications services	Any personal data breach (unless the provider can demonstrate appropriate technical and organisational measures were in place to protect the data)	Without undue delay	ICO
	A breach likely to adversely affect the personal data or privacy of a subscriber or user		The subscriber or user affected by the breach
The Network and Information Systems Regulations 2018 (Regulations 11 & 12)			
Operators of Essential Services (OES)	Incidents that have a significant impact on the continuity of the essential services provided by the OES	Without undue delay and no later than 72 hours after becoming aware	Relevant competent authority
Relevant Digital Service Providers (RDSPs)	Any incident having a substantial impact on the provision of specified digital services provided by the RDSP and subject to having access to relevant information	Without undue delay and no later than 72 hours of becoming aware	ICO
Product Security and Telecommunications Infrastructure Act (PSTIA) (Sections 11, 18, 24)			
Manufacturers	Failure to comply with a relevant security requirement relating to the product ie a compliance failure	As soon as possible/practicable	The relevant enforcement authorities and, subject to specified conditions, customers and others in the supply chain depending on where in the supply chain the failure occurs
Importers and distributors	Becoming aware of a product compliance failure		