

Workshop one – data controllers, data processors and lessons learnt

Scenario one

Premier Jobs

- Originator for the data set;
- Supplies the data to Right Web;
- Is based in Manchester, **UK**

Right Web

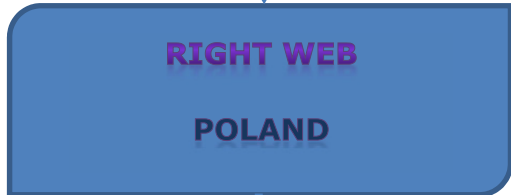
- Third party contracted to build the site;
- Based in **Poland**;
- Employee emails the data set and encryption key to an incorrect email address

Recipient (anon)

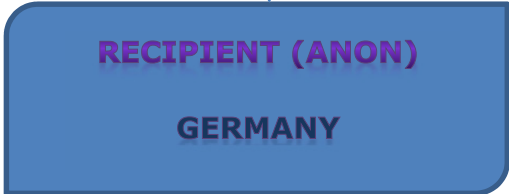
- An individual living in **Germany**;
- Has no business relationship to Premier Jobs or Right Web;
- Refuses to return data set and threatens to upload it to a file sharing site



Supplies data set to Right Web



*Builds website.
Emails information to the incorrect recipient*



Accidental recipient of the data set. Has no business relationship with the above parties

Scenario two

Spear's

- Operates from a headquarters in London, **UK**;
- Underwrites insurance premiums for a number of providers across the European Union;
- Has a direct business relationship with Mega Insurance;
- Receives weekly data transfers from Jackson's regarding new Mega Insurance customer's

Mega Insurance

- Insurance broker offering online facility through which customers can obtain new premiums;
- Headquarters located in **Ireland** but has a European presence;
- Has a direct business relationship with Spear's (underwriters to whom it must supply information) and Jackson's (who hosts the data on its behalf)

Jackson's

- Third party hosting company contracted to hold Mega Insurance's customer details;
- The servers are located in **Italy**;
- Has a direct relationship with Mega Insurance;
- Relationship with Spear's is one way on a data transfer basis only

Spear's Publishing Group

- The company which receives the data by mistake;
- Based in **Canada**;
- Has no business link with Spear's (UK); Mega Insurance or Jackson's

Spear's underwrites Mega Insurance's policies



Jackson's supplies information on new customers to Spear's (the underwriters) by weekly data transfer

Mega Insurance's customer details are hosted by Jackson's



Mega Insurance collects customer details via its website

Jackson's accidentally supplies customer data to Spear's Publishing Group

Spear's Publishing Group is the recipient of the data set. It has no business relationship with any of the above parties

