Thank you for your post, you brought up some interesting information. As you stated, Virgin Media Ireland Limited most definitely violated the GDPR with their unsolicited marketing. For a company of this size, mistakes like this shouldn’t happen. First, they should have an employee to help assist with managing GDPR policies. They should also have proper frameworks in place, and proper guidelines for employees.

As you accurately stated, human error is a probable cause. However, regardless of the intent, human error still results in a GDPR violation (ICO, 2020). As a result, they should be as careful as possible. To reduce human error there are several things they could implement. As you stated, providing a central communication centre would be a great start. It would be good to streamline the process and possibly automate it. As well they could add other techniques such as secure transmissions of data and secure storage of information (hipaaguide, 2020).

On the off chance a breach still occurs, they should also be reported within the 72-hour time limit. This wouldn’t negate the breach, but it could potentially lessen the damages to their companies image.

References:

ICO (2020) Guide to the General Data Protection Regulation (GDPR). Available from: https://ico.org.uk/for-organisations/guide-to-data-protection/ [Accessed 28 January 2022].

Hipaaguide (2020) GDPR for Dummies. Available from: https://www.hipaaguide.net/gdpr-for-dummies/ [Accessed 29 January 2022].