Buttenberg & MP
CONSULTING MANAGEMENT ENGINEERING

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DATA BREACH INCIDENT RESPONSE PLAN

A. OVERVIEW

DATA BREACH INCIDENT RESPONSE PLAN has been produced to provide a coordinated and best practice to a data security breach which can occur for a number of reason, including but not limited to:

- Loss or theft of data or equipment on which data was stored
- Equipment failure
- Human error
- Inappropriate access controls allowing unauthorized use
- Unforeseen circumstances such as fire or flood
- Cyber attack
- Social Engineering offences where information is obtained by deceiving the organization who holds it

B. SCOPE

The plan consists of four key elements:

- Containment & Recovery
- Assessment of ongoing risks
- Notification of breach
- Evaluation and response

C. CONTAIMENT AND RECOVERY

- All incidents or suspected incidents must be reported immediately to the Incident Manager
- The Incident Manager may decide to convene the Incident Response Management Team according to the impact and scale of the incident
- An initial breach evaluation, containment and recovery plan need to be put into action immediately, based on the following:

1. What is the scale and extent of the breach?

2. Are some systems operating normally?

3. Do we need to take steps to limit or constrain the breach?

4. What resources are required to limit the damage and recover quickly?

5. What is the best way to recover from the breach considering as follows:

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- Risks
- Timescales
- Impact
- Business damage (Reputational, Commercial, Legal)

6. What are all the types of data that have been breached by the incident (Special category, Business sensitive, etc.)

7. Assesses the potential impact and damage to the freedom of rights of the individuals who have had personal data breached, if applicable.

8. Who needs to be informed internally and externally?

- The persons internally responsible for the specific data that has been breached
- The Board of Directors
- The individuals themselves if there is likely to be an impact on them
- The Police
- Insurers
- Bank or Credit Card Companies

9. What are the ongoing risks taking into account?

- Freedom, rights, impact or damage to individuals
- Business risks
- Business impact
- Business damage – Reputational, Commercial or Legal

D. NOTIFICATION OF BREACH

Where the breach includes personal data and is likely to have an impact on those individuals the Incident Manager must be informed

10. Notification of a breach will include:

- How and when the breach occurred
- What data was involved
- The level of risk and potential impact that the breach may introduce
- The actions already taken to mitigate the risks and impact
- Give clear and specific advice and recommendations for individuals or organizations on any actions they need to take to protect themselves following the breach
- Describe any other help we are going to provide to help them protect themselves

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E. EVALUATION AND REPONSE

11. A post incident evaluation of how the breach occurred, how it could have been prevented, how it was managed and any lessons learnt must be carried out and documented. The output from the evaluation must be used to update the Breach Management Plan appropriately

Data Breach Incident Response Management Team

Name	Role	Contact Email
	Incident Manager	
	Data Protection Officer	