

GDPR  
Incident Process

Step	Risk/Incident Identification & Validation				
1	INCOMING ALLEGED INCIDENT	Data Considerations {documents created to identify due diligence and understanding of ACTIVITY}		Leo Nelson-DISO or Designate Ray Braeunig-CC&PO Jeanette Jones-CM	Entered into Global- Assigned Number
2	Rowan-Police when appropriate/Police Report Completed			Sgt. Philip Powers/COO/Others	
2A	IRT/Technical Considerations {Significant for GDPR}			Leo Nelson-DISO or Designate & Mark Sedlock/Mira Lalovic-Hand**	
3		Risk Analysis performed and documented Lorraine Sacchetti is contacted		OECCI & IRT/ISO & LEGAL	
3A	GDPR Requirement = 3 Days {72 Hours}	Follow appropriate laws, regulations and policy to determine Breach notification Requirements		OECCI & IRT/ISO & LEGAL	
	STOP - COMPLETE OR STEP 4	STOP - COMPLETE OR STEP 4		STOP - COMPLETE OR STEP 4	
4	Risk and Claims		Lorraine Sacchetti	Organizes call with:	
4A	INFORM INFORM INFORM		We have a Ransomware Event		
5	Beazley Event Triage				
6	OECCI	Ray Braeunig/Jeanette Jones		On Beasley Calls	Provided Emails
	IRT	Leo Nelson-DISO or Designate & Mark Sedlock/Mira Lalovic-Hand		X	X
	Beazley	Local Contact		X	X
	Media	Joe Cardona/Gerald Carey/COO		X	X
	Legal	Beth Gorman/Other {Melissa Wheatcroft}		X	X
	HR	Terri Drye		X	X
	VP Level	EVP or Designate/Mira Lalovic-Hand/Joanne Connor		****	X
	Other Departments specific to need		Department contacts as appropriate		X

Communication:  
Annual Compliance Training  
Compliance Officer's Compliance Committees  
Training Material for Rowan Police  
Training Material/SOP-script for discussions  
(patients/employees/students/etc)