

Before the Incident	T0	T0-24 Hours	24-72 Hours	Days 3-10	Regulatory Clocks Start	Days 10-180	180 Days- - 1 Year
Ongoing / Quarterly	Incident Detected	Stabilize Control & Privilege	Response Team & Business Impact	Facts, Risk & Materiality	Jurisdiction - Specific	Disclosure & Market Communications	Post-Incident Fiduciary Oversight
Standing Duty	Minutes–Hours	Stabilize Control & Privilege	Response Team & Business Impact	Facts, Risk & Materiality	Jurisdiction-Specific	Disclosure & Market Communications	Post-Incident Fiduciary Oversight
<ul style="list-style-type: none"> ·Data classification & geographic exposure ·Regulatory obligations (US, EU, UK, Asia, Middle East) ·Incident governance & authority ·Cyber & D&O insurance review ·Board reporting cadence & escalation triggers 	<ul style="list-style-type: none"> ·Credible ransomware / breach / intrusion identified ·CEO, General Counsel, CISO alerted ·Audit Chair / Board notified per charter ·Assume communications may be compromised 	<ul style="list-style-type: none"> ·Outside counsel engaged → privilege established ·Cyber insurance notified (coverage preserved) ·Out-of-band communications activated ·Initial containment actions begin 	<ul style="list-style-type: none"> ·Forensics retained <i>by counsel</i> ·Breach coach / law firm confirmed (no conflicts) ·Crisis communications & IR engaged ·Business continuity decisions (systems, operations, customers) 	<ul style="list-style-type: none"> ·Scope of intrusion clarified ·Data types & jurisdictions confirmed ·Financial, operational, and legal exposure assessed ·Materiality determination reviewed by board 	<ul style="list-style-type: none"> ·U.S.: SEC disclosure timeline triggered (if material) ·EU / UK: GDPR / ICO notification clocks ·Asia & Middle East: local regulator and sector rules ·Customer / partner notifications coordinated 	<ul style="list-style-type: none"> ·Regulatory filings completed ·Investor & stakeholder messaging aligned ·Litigation posture assessed ·Insurance claims advanced 	<ul style="list-style-type: none"> Root cause & control remediation ·Governance and policy updates ·Disclosure consistency review ·Board record preservation

