

		[Insert Registered Legal Entity Name Here]									
Document number: P30S		Document Title: Incident Response Policy									
Version: 1.0		Effective Date: 01.01.2025		Document Owner:							
X	Policy		Standard		Procedure		Form		Register		Other

Revision history				
Revision number	Revision Date	Changes	Reviewed by	Process owner

Approvals			
Name	Title	Date	Signature

Aligned with standards and regulations where applicable		
Standard/Regulation	Clause/Article	Comment
ISO/IEC 27001:2022	Clauses 6.1, 6.3, 8.1	
ISO/IEC 27002:2022	Controls 5.24, 5.25	
NIST SP 800-53 Rev.5	IR-4, IR-5, IR-6	
EU GDPR	Article 33	
EU NIS2	Article 23	
EU DORA	Article 17	
COBIT 2019	DSS02, DSS04	

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1. Purpose

- 1.1. This policy defines how the organization detects, reports, and responds to information security incidents affecting its digital systems, data, or services.
- 1.2. It enables the organization to minimize damage, protect customer data, and meet regulatory obligations such as GDPR’s 72-hour breach notification requirement.
- 1.3. The policy ensures clear responsibilities, communication steps, and post-incident follow-up, even in small organizations without a dedicated security team.

2. Scope

- 2.1. This policy applies to:
 - 2.1.1. All employees, contractors, and external IT service providers
 - 2.1.2. All company-managed systems and services, including websites, cloud platforms, mobile devices, laptops, and email accounts
 - 2.1.3. All types of incidents, including:
 - 2.1.3.1. Unauthorized access to data or systems
 - 2.1.3.2. Malware infections or ransomware
 - 2.1.3.3. Phishing or social engineering attempts
 - 2.1.3.4. System outages due to cyberattack or misuse
 - 2.1.3.5. Accidental disclosure or deletion of sensitive information
 - 2.1.3.6. Loss or theft of business devices or storage media

3. Objectives

- 3.1. Establish a clear process for recognizing and escalating security incidents.
- 3.2. Ensure that incidents are reported, logged, and acted upon within predefined timeframes.
- 3.3. Enable swift containment of damage, data recovery, and service restoration.
- 3.4. Ensure that affected parties (e.g., customers, regulators) are notified when required by law.
- 3.5. Prevent recurrence through root cause analysis, corrective action, and policy improvement.
- 3.6. Enable SMEs to meet ISO 27001 certification requirements and demonstrate accountability during audits.

4. Roles and Responsibilities

- 4.1. General Manager (GM)
 - 4.1.1. Owns this policy and ensures it is implemented.
 - 4.1.2. Oversees incident response activities and approves notifications to regulators or customers.

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Reference Standards and Frameworks

ISO/IEC 27001:2022

- Clause 6.1 – Requires risk treatment planning, including preparation for incidents.
- Clause 6.3 – Supports continual improvement through lessons learned from security events.

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Clause 8.1 – Emphasizes operational control to manage incidents and disruptions.

ISO/IEC 27002:2022

Control 5.24 – Requires a structured approach for reporting, assessing, and responding to information security incidents.

Control 5.25 – Focuses on learning from incidents to improve future readiness and system resilience.

NIST SP 800-53 Rev.5

IR-4 – Defines incident handling procedures including containment and recovery.

IR-5 – Establishes requirements for incident monitoring and analysis.

IR-6 – Mandates external and internal incident reporting protocols.

EU GDPR

Article 33 – Requires reporting of personal data breaches to regulators within 72 hours, with details on scope and mitigation.

EU NIS2 Directive (2022/2555)

Article 23 – Requires essential and important entities to notify competent authorities of significant incidents using standardized reporting formats.

EU DORA Regulation (2022/2554)

Article 17 – Requires financial entities to classify, report, and track ICT-related incidents and disruptions.

COBIT 2019

DSS02 – Manage Service Requests and Incidents: Guides effective handling of operational and security incidents in line with governance objectives.

DSS04 – Manage Continuity: Connects incident response with broader continuity and recovery strategies.

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