Incident response plan

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Owned by the Founder & CEO · Approved by the Founder & CEO
Latest version: https://gdpr.complydog.com/documents/policies/incident-response

Why we have this plan

Problems happen. This plan makes sure ComplyDog spots them early, deals with them calmly, tells the right people in time and learns from them.

What counts as an incident

Anything that puts our systems or information at risk. For example: a lost laptop, a phishing email someone clicked, an account used by the wrong person, data sent to the wrong place, malware, or a service outage.

Report it straight away

Anyone who notices something tells support@complydog.com at once, even if they're not sure. Reporting early is always right; nobody is blamed for reporting.

What we do

- Contain it: stop the damage spreading, for example by locking an account or taking a system offline.
- Assess it: what happened, what information and which customers are affected, and how serious it is.
- Tell people: affected customers without undue delay, and within 48 hours of confirming the incident, and anyone our contracts say we must tell.
- Fix it: remove the cause and restore normal service, from backups if needed.
- Record it: what happened, what we did and when, in our incident log.

Personal data breaches

If personal data is involved, the incident is also logged as a data breach. Unless it's unlikely to put people at risk, we tell the Finnish Data Protection Ombudsman within 72 hours of finding out, and tell the people affected without delay if the risk to them is high.

Afterwards

We review every serious incident within two weeks: what went wrong, what went well, and what we'll change. The changes get an owner and a date.

Who is responsible

The Founder & CEO leads the response, with the lead developer taking over when they're away. We practise this plan once a year. The Founder & CEO owns it and looks at it again at least every 12 months. The Founder & CEO approved it. When we review this plan, we also

check it's being followed: we look at the records it asks for and fix any gaps we find. If something in this plan can't be followed, the Founder & CEO can agree an exception. It's written down with the reason, what we do instead and an end date.