

# Northbridge — Incident vs Breach Decision Tree

<b>Policy Owner</b>	<b>Legal</b>
Effective Date	2025-08-01
Revision	1.0
Classification	Internal Use Only
Applies To	All Employees, Contractors, and Vendors

## 1. Purpose

This document establishes Northbridge standards for incident vs breach decision tree, enabling consistent execution, compliance, and risk reduction.

## 2. Scope

This policy/procedure applies to all Northbridge personnel, systems, and third parties involved in the activities covered herein.

## 3. Roles & Responsibilities

- Policy Owner: accountable for stewardship and annual review.
- IT/Security: implements controls, monitors compliance, and reports deviations.
- Managers: enforce requirements within their teams.
- Employees/Contractors: follow procedures and report issues immediately.

## 4. Requirements & Procedures

- Classify event severity and data types involved (NPPI, PHI, PCI).
- Determine legal definition of 'breach' under applicable laws.
- If breach likely, initiate regulator/customer notification workflows.
- Record decisions and rationale; obtain counsel sign-off.

## 5. Compliance & Exceptions

Exceptions must be documented with compensating controls and approved by the Information Technology Director. Non-compliance may result in disciplinary action.

## 6. Review & Maintenance

This document is reviewed annually and upon material change in risk, technology, or regulation.