

# Incident Response and Notification Policy

**Version:** 1.0

**Last Updated:** October 2025

**Approved By:** Chief Information Security Officer (CISO)

**Next Review Date:** October 2026

## 1. Purpose

This policy defines Orbitel.ai's structured approach to identifying, responding to, containing, and recovering from information security incidents and data breaches.

Its objectives are to:

- Minimize impact to systems, customers, and operations.
- Ensure timely notification to affected individuals and regulators.
- Strengthen systems through lessons learned and root cause analysis.

## 2. Scope

Applies to:

- All employees, contractors, and third parties handling Orbitel data or systems.
- All incidents that could affect the confidentiality, integrity, or availability of Orbitel's infrastructure, data, or AI models.

## 3. Governance and Responsibilities

- **Incident Response Team (IRT):** Composed of members from Security, Legal, Compliance, and Engineering.
- **CISO:** Approves response procedures and oversees major investigations.

- **SOC Analysts:** Detect and triage potential threats.
- **Legal and Privacy Teams:** Coordinate notifications to customers, partners, and regulators.

## 4. Policy Statements and Process

### a. Detection and Reporting

- All employees must report suspected incidents to the Security Operations Center (SOC) immediately.
- Automated monitoring tools detect anomalies, malware, and unauthorized access attempts 24/7.

### b. Classification and Severity Assessment

Incidents are categorized as:

- *Low:* Minor internal security events (e.g., failed login attempts).
- *Medium:* Limited data exposure or localized service interruption.
- *High:* Confirmed data breach, major outage, or compromise of customer data.

### c. Containment and Eradication

- Affected systems are isolated, credentials rotated, and malicious artifacts removed.
- Forensic evidence is preserved according to legal and regulatory requirements.

### d. Recovery

- Systems are restored using verified clean backups.
- Post-restoration monitoring continues for at least 72 hours to ensure stability.

### e. Communication and Notification

- Customers are notified promptly if their data is affected.

- Regulatory notifications follow statutory timelines (e.g., CERT-In within 6 hours; GDPR within 72 hours).
- All communications are clear, factual, and transparent.

#### **f. Post-Incident Review**

- A root cause analysis (RCA) is conducted within 10 business days of resolution.
- Recommendations are logged and tracked to closure through Orbitel's Corrective Action Process.

### **5. Compliance and Continuous Improvement**

The IRT conducts quarterly tabletop exercises to test readiness.

This policy supports ISO 27001 A.5.25 and DPDP 2023 Section 8 requirements for breach notification.

Annual review ensures alignment with evolving threat landscapes and legal expectations.