

Data Breach Response Plan

Responding to data breaches under the Notifiable Data Breaches (NDB) scheme

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Approved by	Board of Directors
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1. Purpose

This plan sets out how MortarCAPS identifies, contains, assesses and reports data breaches, in line with the Notifiable Data Breaches scheme under the Privacy Act 1988 (Cth).

2. Scope

Applies to all personal information held by MortarCAPS, in any system or format, and to all staff, contractors and service providers.

3. What is an eligible data breach

An eligible data breach occurs where there is unauthorised access to, disclosure of, or loss of personal information that is likely to result in serious harm to an individual, and the risk cannot be remediated.

4. Roles

- Response Lead — Head of Operations: coordinates the response and record-keeping.
- Board — notified of any breach; approves external notifications.
- All staff — must report a suspected breach to the Response Lead immediately.

5. Response steps

Step 1 — Contain (immediately)

Take immediate action to limit the breach (e.g. revoke access, isolate systems, recover data).

Step 2 — Assess (within 30 days)

Assess whether the breach is likely to result in serious harm, considering the type and sensitivity of information, the circumstances, and mitigating steps.

Step 3 — Notify

If serious harm is likely, notify the Office of the Australian Information Commissioner (OAIC) and affected individuals as soon as practicable, describing the breach, the information involved and recommended steps.

Step 4 — Review

Conduct a post-incident review and update controls to prevent recurrence.

6. Record-keeping

All breaches and suspected breaches are logged in the breach register, whether or not notification is required.

7. Cross-border

Where a breach involves personal information from New Zealand or Canada, additional obligations under the NZ Privacy Act 2020 and Canada's PIPEDA (and provincial laws such as Quebec Law 25) may also apply.

8. Contact

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