Date Filed: October 05, 2026

Witness: Christopher Leigh
Request from: Office of Consumer Counsel

Question:

(Cybersecurity) Please refer to OCC-128 Attachment 1, section 8.1, Please provide a copy of the Data Breach Incident Response Manual. Please provide information regarding the Manual, including when it was originally developed, when it was most recently updated, and how the Company incorporates lessons learned from data breach incidents into subsequent updates to the Manual and its processes. Please provide an example of when the process in the Manual was used/followed.

Response:

The Personal Information Incident Response Plan was originally developed in June 2013. The plan has been revised several times with the last update in March 2026 (please refer to OCC-767, Attachment 1 CONFIDENTIAL, for the most updated plan). During a privacy-related event in May, the organization leveraged its established Personal Information Incident Response Plan as a guiding framework for response and coordination activities. The plan is subject to periodic review, including an annual assessment, to ensure continued relevance, accuracy, and alignment with organizational processes. As part of this review process, updates are incorporated as appropriate to reflect operational experience, regulatory requirements, and evolving business needs, while also facilitating knowledge transfer and responder preparedness.