



TCWGlobal’s Security Incident Response Plan

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V3.1	10/1/2021	Updated with new company name and logo, and law firm first contact per risk management/Breach coach discussion with Scott Koller	Robyn Ise, Erica Ostberg, Andy Waggoner, Marisa Farwell, Justin Black
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Purpose and Scope

All security incidents must be managed in an efficient and time effective manner to make sure that the impact of an incident is contained and the consequences for our business and customers are limited. This document sets out TCWGlobal's plan for reporting and dealing with security incidents.

What is a Security Incident?

A Security Incident means any incident that occurs by accident, or deliberately, that impacts any of our business systems. An incident may be any event or set of circumstances that threatens the confidentiality, integrity or availability of information, data or services in TCWGlobal, including our client's data.

How to Recognize a Security Incident

A security incident may not be recognized immediately; however, there may be indicators of a security breach, system compromise, unauthorized activity, or signs of misuse within our environment. Some examples are below.

Note that in most cases we have tools in place to watch for, alert, and remediate these issues automatically, however, if YOU see something that looks suspicious, please notify a team member or our CTO immediately:

- Excessive or unusual login and system activity, especially from any inactive user accounts



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- Watch out for excessive or unusual remote access activity. This could be relating to staff or third-party providers
- The occurrence of any new wireless (Wi-Fi) networks visible or accessible from your environment
- The presence of or unusual activity in relation to malware (malicious software), suspicious files, or new/unapproved executables and programs. This could be on our network, your computer, in email, etc.
- Hardware or software keyloggers found connected to or installed on systems
- Lost, stolen, or misplaced computers, laptops, hard drives, or other media devices that contain any company data
- Phishing or impersonation attempts
- Sensitive data appearing in AI outputs
- Prompt injection attempts against AI-enabled systems

Roles and Responsibilities

TCWGlobal's security incident response plan must be followed by all personnel. This includes all employees, temporary staff, consultants, contractors, suppliers and third parties operating on behalf of TCWGlobal, working with TCWGlobal's or our customers' data or on TCWGlobal premises. For simplicity, all of these personnel are referred to as 'staff' within this plan.

Roles

The TCWGlobal **Security Incident Response Team (SIRT)** is comprised of:

Role*	SIRT Responsibility	Name	Email	Telephone
CTO/CISO	Incident Response Lead	Andy Waggoner	Andy@tcwglobal.com	Office: (858)810-3033 Mobile: (858)729-4499
System Administrator	Incident Response Technical Lead	Jesus Gomez	Jesus.gomez@tcwglobal.com	Cell Phone: (858) 254-2194 Office: (858) 810-3013
IT Manager	Incident Response Technical Lead	Josh Slocum	Josh.slocum@tcwglobal.com	Cell Phone: (951) 566-6776



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				Office: (858) 810-3011
Dev Ops Engineer	StaffingNation Incident Response Technical Lead	Srinivas Chirapu	srinivas.chirapu@tcwglobal.com	858-539-5296
CCO	Compliance Lead Legal questions/issues/communications relating to security incidents	Erica Ostberg	erica.ostberg@tcwglobal.com	Office: 858-810-3323 Cell:619-922-6647
Human Resources	Handling of any personnel and disciplinary issues relating to security incidents	Rachel Altman	Rachel.altman@tcwglobal.com	Cell: 619-997-3080 Office: 858-810-3092
CCO	Operation Lead Handling of customer communications and response	Erica Ostberg	erica.ostberg@tcwglobal.com	Cell: 619-922-6647 Office: 858-810-3323

Responsibilities

The **Incident Response Lead** is responsible for:

- Ensuring that the Security Incident Response Plan and associated response and escalation procedures are defined and documented, to ensure the handling of security incidents is timely and effective.
- Review, test, and update the plan yearly.
- Ensure the Security Incident Response Team are properly trained, at least once each year.
- Leading the investigation of a suspected breach, reported security incident, or AI-related incidents and initiating the Security Incident Response Plan, as and when needed.
- Preserving evidence collected during investigation including prompts, emails, outputs, and logs.
- Reporting to and communicating with external parties, including clients, legal representation, law enforcement, etc. as is required.
- Coordinating and assessing any vendor involvement and working with Compliance Lead regarding contractual obligations.
- Determining whether systems require suspension during investigation.



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- Authorizing onsite investigations by appropriate law enforcement as required during any security incident investigation. This includes authorizing access to/removal of evidence from site.

Security Incident Response Team (SIRT) members are responsible for:

- Making sure that all staff understand how to identify and report a suspected or actual security incident.
- Advising the Incident Response Lead of an incident when they receive a security incident report from staff.
- Investigating each reported incident.
- Taking action to limit the exposure of sensitive data and to reduce the risks that may be associated with any incident.
- Gathering, reviewing and analyzing logs and related information from various central and local safeguards, security measures and controls.
- Documenting and maintaining accurate and detailed records of the incident and all activities that were undertaken in response to an incident.
- Reporting each security incident and findings to the appropriate parties. This may include third party service providers, business partners, customers, etc., as required.
- Assisting law enforcement during the investigation processes. This includes any forensic investigations and prosecutions.
- Resolving each incident to the satisfaction of all parties involved, including external parties.
- Initiating follow-up actions to reduce likelihood of recurrence, as appropriate.
- Determining if policies, processes, technologies, security measures or controls need to be updated to avoid a similar incident in the future. They also need to consider whether additional safeguards are required in the environment where the incident occurred.

All TCWGlobal staff members are responsible for:

- Making sure they understand how to identify and report a suspected or actual security incident.
- Reporting a suspected or actual security incident to the Incident Response Lead (preferable) or to another member of the Security Incident Response Team (SIRT)
- Reporting any security related issues or concerns to management, or to a member of the SIRT
- Complying with the security policies and procedures of TCWGlobal. This includes any updated or temporary measures introduced in response to a security incident (e.g. for business continuity, incident recovery or to prevent recurrence of an incident).

External Contacts

External Party	Contact Name	Email	Telephone
Law firm Baker Hostettler	Call the 855 number for 24/7 hotline to lawyer team/breach coaches		855-217-5204 24/7 hotline



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Cyber insurance Policy - Houston Casualty Policy and Excess Cyber Policy Details	Call 1-888-627-8995 to file a claim Primary Cyber Coverage – Tokio Marine HCC Policy#H21NGP209993-04 Excess Coverage – Sunstone Assurance Policy#JJ-1-DIC 2020	CyberClaims@tmhcc.com	888-627-8995
Chosen Forensics firms (2)	Kivu Consulting www.kivuconsulting.com (investigation + ransomware) Kroll Cyber Security www.kroll.com Charles rivers – phishing incident		
Vinebrook (SOC responsibilities for StaffingNation)		tcw@vinebrookmsp.com	
Artic Wolf (Cybersecurity team for TCW Global)		security@articwolf.com	
San Diego Computer and Technology Crime High Tech Response Team :CATCH" Team		https://catchteam.org/	(619) 531-3150
FBI San Diego Field Office	Suzanne Turner is the special agent in charge for SD	https://www.fbi.gov/contact-us/field-offices/sandiego	(858) 320-1800

Incident Response Plan Steps

There are a number of steps and stages that must be taken to make sure that we protect our business by reacting to a security



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incident appropriately.

Report

1. Information security incidents must be reported, ASAP, to the Incident Response Lead (preferable) or to another member of the Security Incident Response Team (SIRT). The member of the SIRT receiving the report will advise the Incident Response Lead of the incident.

In the event that a security incident or data breach is suspected to have occurred, we recommend the staff member discuss their concerns with their manager, who in turn may raise the issue with a member of the SIRT.

Investigate

1. After being notified of a security incident, the SIRT will perform an initial investigation and determine the appropriate response, which may be to initiate the Security Incident Response Plan.

If the Security Incident Response Plan is initiated, the SIRT will investigate the incident and initiate actions to limit the exposure of data in mitigating the risks associated with the incident.

Containment

1. Isolate compromised systems from network and unplug any network cables – without turning the systems off.
2. If applicable, suspend compromised AI integrations, API keys, AI agents, or automated workflows associated with the incident.
3. If applicable, change the SSID on the WAP and other systems that may be using this wireless network (but not on any of the systems believed to be compromised).
4. Preserve all logs and similar electronic evidence, i.e. logs from firewall, anti-virus tool, access control system, web server, application server, databases, AI systems, AI prompts/outputs, API activity logs, and related monitoring tools.
5. Perform a back-up of your systems to preserve current state – this will also facilitate any subsequent investigations.
6. Keep a record of ALL actions you and all members of the SIRT take.
7. Stay alert for further indications of compromise or suspicious activity in the environment.
8. If possible, gather details of all compromised or potentially compromised accounts, integrations, credentials, and AI services.

Inform

Once the SIRT has carried out their initial investigation of the security incident:

1. The Incident Response Lead will alert the SIRT's senior management primary contact.



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2. The Incident Response Lead and / or the SIRT personnel responsible for communications will inform all relevant parties. This may include a call to Hiscox, local law enforcement, and other parties that may be affected by the compromise such as our customers, business partners and suppliers. This also includes the personal data breach notification contacts, as applicable to the incident under investigation.

Compliance Lead and Incident Response Lead review should occur where incidents involve:

- regulated, confidential, or protected data submitted to AI tools or AI-enabled systems;
- vendor compromise, unauthorized disclosure, or third-party AI service incidents; or suspected prompt injection, AI output manipulation, or unauthorized AI-generated disclosures.

Maintain Business Continuity

1. The SIRT will engage with our operational teams to make sure that our business can continue to operate while the security incident is being investigated.

Resolve

1. The SIRT will work with external parties, including law enforcement, etc., to ensure appropriate incident investigation (which may include onsite forensic investigation) and gathering of evidence, as is required.
2. The members of the SIRT will take action to investigate and resolve the problem to the satisfaction of all parties and stakeholders involved. This will include confirmation that the required controls and security measures are operational.
3. The Incident Response Lead will report the investigation findings and resolution of the security incident to the appropriate parties and stakeholders (including your acquirer, local law enforcement, etc.) as is needed.

Recover

1. The Incident Response Lead will authorize a return to normal operations once satisfactory resolution is confirmed.
2. The SIRT will notify the rest of the business that normal business operations can resume. Normal operations must adopt any updated processes, technologies or security measures identified and implemented during incident resolution, and all updates or changes must be documented and training performed.

Review

The SIRT will complete a post-incident review after every security incident. The review will consider how the incident occurred, what the root causes were and how well the incident was handled. This will help to identify recommendations for better future responses and to avoid a similar incident in the future.

Changes and updates that may be required include:

- Updates to the Security Incident Response Plan and associated procedures.



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- Updates to our security or operational policies and procedures.
- Updates to technologies, security measures or controls
- The introduction of additional safeguards in the environment where the incident occurred (for example, more effective malware protection).
- The SIRT Executive Officer/Risk Owner (the senior management primary contact) will ensure that the required updates and changes are adopted or implemented as necessary.

Appendix A

Specific Incident Response Types

Some specific incident types requiring additional response actions are provided below.

Malware (or Malicious Code)

1. Disconnect devices identified with malware from the network IMMEDIATELY. Remember to look for a wired as well as wireless connection.
2. Disable the user's account immediately (if applicable)
3. Examine the malware to identify the type (e.g. rootkit, ransomware, etc.) and establish how it infected the device, in order to understand how to remove it.
4. Once the malware has been removed a full system scan must be performed, to verify it has been removed from the device.
5. If the malware cannot be removed from the device, it must be tagged as breached, and the user issued a new device.
6. A full scan of all network devices may be necessary
7. Protect the system(s) to prevent further infection by implementing fixes and/or patches to prevent further attack.
8. The user's credentials must be changed
9. The breached device must be fully wiped, and rebuilt.

Unauthorized Wireless Access Points

If unauthorized wireless access points are detected, or reported by staff, these must be recorded as a security incident.

1. SIRT will investigate to identify the location of the unauthorized wireless access point/device.
2. The SIRT will investigate as to whether or not the unauthorized wireless access point/device is being used for a legitimate business purpose/need. If a legitimate business reason is identified, then this wireless access point or device must be reviewed and go through the correct management approval process. This is to make sure that the business justification is documented and the wireless access point/device is securely configured (e.g. change default passwords and settings, enable strong authentication and encryption, etc.).
3. All other unauthorized wireless access points/devices must be located, shutdown and removed.



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Loss of Equipment

1. The theft or loss of an asset, such as a PC, laptop or mobile device, must be reported immediately to a member of the SIRT and local law enforcement. This includes losses/thefts outside of business hours and on weekends.
2. If the device that is lost or stolen contained sensitive or customer data and the device is not encrypted, SIRT will complete an analysis of the sensitivity, type and volume of data stolen. With this said, all devices at TCWGlobal have disk-based encryption configured.
3. In the case of a mobile device registered in our MDM policy, SIRT will initiate a remote wipe. Evidence should be captured to confirm this was successfully completed.

AI System or Generative AI Incident

If unauthorized, suspicious, or compromised AI system activity is detected or reported, the activity must be recorded as a security incident.

1. The SIRT will investigate to identify the affected AI systems, integrations, prompts, users, datasets, and related activity associated with the incident.
2. The SIRT will preserve all relevant evidence associated with the incident, including prompts, outputs, logs, API activity, user activity, and related records necessary for investigation and forensic review.
3. The SIRT will assess whether confidential, proprietary, regulated, employee, candidate, customer, or other protected information was accessed, disclosed, processed, or exposed through the AI system or related integrations.
4. If compromise or unauthorized activity is suspected, the SIRT may suspend affected AI integrations, API keys, automated workflows, user access, or related services until the investigation is completed.
5. The Incident Response Lead and/or SIRT will evaluate whether internal escalation, legal review, customer notification, regulatory notification, cyber insurance notification, or third-party vendor notification obligations apply.
6. Following resolution of the incident, the SIRT will conduct a post-incident review to determine whether updates to policies, processes, AI governance controls, security measures, vendor management practices, or staff training are necessary to reduce the likelihood of recurrence.

Non Compliance with TCWGlobal's Security Policy

Any deliberate or accidental actions that are in breach of TCWGlobal's security policy, including systems or data misuse, unauthorized exposure of data to external parties, or unauthorized changes to systems or data.

1. SIRT will engage with the relevant business area to establish an audit trail of events and actions. They will determine who is involved in the policy violation and the extent of the violation.
2. SIRT and/or manager will notify Human Resources of the incident.
3. SIRT will work with Human Resources and manager to determine whether disciplinary action is needed.
4. SIRT will undertake an assessment of the impact and provide advice and guidance to the business area to prevent reoccurrence, for example, retraining of staff.

Testing and Updates

Annual testing of the Incident Response Plan using walkthroughs and practical simulations of potential incident scenarios is



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necessary to ensure the SIRT are aware of their obligations, unless real incidents occur which test the full functionality of the process.

1. The Incident Response Plan will be tested at least once annually, per our Incident Response Policy.
2. The Incident Response Plan Testing will test our business response to potential incident scenarios to identify process gaps and improvement areas.
3. The SIRT will record observations made during the testing, such as steps that were poorly executed or misunderstood by participants and those aspects that need improvement.
4. The Incident Response Lead will ensure the Security Incident Response Plan is updated and distributed to SIRT members.