

# Breach Notification Clocks, one page

Every deadline, when the clock starts, and who files. The clocks stack: one incident can be on five calendars at once. Print this, date it, and pin it where the incident plan lives.

| Regime                                 | Deadline                                                                                             | Clock starts                                       | Goes to                                                                  |
|----------------------------------------|------------------------------------------------------------------------------------------------------|----------------------------------------------------|--------------------------------------------------------------------------|
| GDPR (EU/UK residents)                 | <b>72 hours to the authority</b>                                                                     | Awareness of the breach                            | Lead supervisory authority; individuals without undue delay if high risk |
| HIPAA (protected health info)          | <b>60 days to individuals</b>                                                                        | Discovery of the breach                            | Individuals; contemporaneous log; HHS annually; media if 500+ in a state |
| US state breach laws                   | <b>Most: without unreasonable delay. 30 days in CO, FL, ME, ND, WA; TX 60 days at 250+ residents</b> | Discovery (statute-dependent)                      | Affected residents; state AGs above thresholds (commonly 250 or 500)     |
| SEC Item 1.05 (listed companies)       | <b>4 business days (Form 8-K)</b>                                                                    | Determination the incident is material             | SEC filing, via disclosure counsel                                       |
| Banking (interagency rule)             | <b>36 hours</b>                                                                                      | Determination a notification incident occurred     | Primary federal regulator (OCC, FDIC, Federal Reserve)                   |
| NYDFS Part 500                         | <b>72 hours</b>                                                                                      | Qualifying cybersecurity event                     | NY Department of Financial Services superintendent                       |
| FTC Safeguards Rule (non-bank finance) | <b>30 days</b>                                                                                       | Discovery; unencrypted info of 500+ consumers      | The FTC directly                                                         |
| SEC Regulation S-P (brokers, advisers) | <b>30 days to individuals</b>                                                                        | Discovery of unauthorized access to sensitive info | Affected individuals, per the rule's content requirements                |
| State insurance (NAIC model law)       | <b>72 hours (varies by state)</b>                                                                    | Determination a cybersecurity event occurred       | State insurance commissioner                                             |
| Contractual notices                    | Per contract                                                                                         | Per contract terms                                 | Customers, partners, counterparties (missed notices pay real damages)    |

The matrix method, per-regime guides, and the penalty exposure calculator: [vendorquals.com/blog/breach-response-checklist](https://vendorquals.com/blog/breach-response-checklist) covers the first 24 hours before any clock is filed against.

Free, no signup, from [vendorquals.com](https://vendorquals.com), the evidence-graded incident response firm directory. Not legal advice; verify current rules with counsel before relying on them. Guides behind this sheet: [vendorquals.com/blog/state-breach-notification-laws](https://vendorquals.com/blog/state-breach-notification-laws), [vendorquals.com/blog/financial-services-breach-notification](https://vendorquals.com/blog/financial-services-breach-notification), [vendorquals.com/tools/breach-cost-calculator](https://vendorquals.com/tools/breach-cost-calculator)