



# Visma Verzuim

## Statement of Applicability ISO 27001:2013 Visma Verzuim B.V.

**Author** Remco Koman | Information Security Officer  
**Approved by** Information Security Committee  
**Version** 1.4  
**Classification** Public

# Statement of Applicability

| SoA details                     |   |
|---------------------------------|---|
| <b>Company</b>                  | Visma Verzuim B.V.  |
| <b>Date</b>                     |   |
| <b>Last review</b>              | 24-03-2021  |
| <b>Version</b>                  | 1.4   |
| <b>Norm</b>                     | ISO 27001:2013  |
| <b>Purpose of this document</b> | This document sets out which of the controls from the standard have been adopted and why any may have been excluded.  |
| <b>Management statement</b>     | The management of Visma Verzuim B.V. hereby declares that the measures stated in this SoA have been confirmed in relation to the assessments.   |
| <b>Scope of the SoA</b>         | Information security of customer information within development, hosting, maintenance, consultancy, sales and support for the Visma Verzuim B.V. Software as a Service products and information security of corporate information of Visma Verzuim B.V. itself in accordance with Statement of Applicability version 1.4 dated 24-3-2021. |

| Section   | Control   | Control description   | Control applicable | Justification                           | Control status      |
|---|---|---|--------------------|---|---------------------|
| <b>A.5 Information security policies</b>            |   |   |                    |   |                     |
| A.5.1 Management direction for information security | A.5.1.1 Policies for information security               | A set of policies for information security shall be defined, approved by management, published and communicated to employees and relevant external parties.                       | Yes                | Required to define and execute the ISMS | Control implemented |
|   | A.5.1.2 Review of the policies for information security | The policies for information security shall be reviewed at planned intervals or if significant changes occur to ensure their continuing suitability, adequacy and effectiveness.  | Yes                | Required to maintain the ISMS           | Control implemented |
|   | <b>Totals:</b>  |   | <b>2</b>           |   | <b>2</b>            |
| <b>A.6 Organization of information security</b>     |   |   |                    |   |                     |
| A.6.1 Internal organization                         | A.6.1.1 Information security roles and responsibilities | All information security responsibilities shall be defined and allocated.   | Yes                | Risk assessment                         | Control implemented |
|   | A.6.1.2 Segregation of duties                           | Conflicting duties and areas of responsibility shall be segregated to reduce opportunities for unauthorized or unintentional modification or misuse of the organization's assets. | Yes                | Risk assessment                         | Control implemented |
|   | A.6.1.3 Contact with authorities                        | Appropriate contacts with relevant authorities shall be maintained.   | Yes                | Legal requirements                      | Control implemented |
|   | A.6.1.4 Contact with special interest groups            | Appropriate contacts with special interest groups or other specialist security forums and professional associations shall be maintained.  | Yes                | Risk assessment                         | Control implemented |

| Section                            | Control  | Control description   | Control applicable | Justification   | Control status      |
|------------------------------------|--|---|--------------------|-----------------|---------------------|
|                                    | A.6.1.5 Information security in project management | Information security shall be addressed in project management, regardless of the type of the project.   | Yes                | Risk assessment | Control implemented |
|                                    | A.6.2.1 Mobile device policy                       | A policy and supporting security measures shall be adopted to manage the risks introduced by using mobile devices.  | Yes                | Risk assessment | Control implemented |
|                                    | A.6.2.2 Teleworking                                | A policy and supporting security measures shall be implemented to protect information accessed, processed or stored at teleworking sites.   | Yes                | Risk assessment | Control implemented |
|                                    | <b>Totals:</b>                                     |   | <b>7</b>           |                 | <b>7</b>            |
| <b>A.7 Human resource security</b> |  |   |                    |                 |                     |
| A.7.1 Prior to employment          | A.7.1.1 Screening                                  | Background verification checks on all candidates for employment shall be carried out in accordance with relevant laws, regulations and ethics and shall be proportional to the business requirements, the classification of the information to be accessed and the perceived risks. | Yes                | Risk assessment | Control implemented |
|                                    | A.7.1.2 Terms and conditions of employment         | The contractual agreements with employees and contractors shall state their and the organization's responsibilities for information security.   | Yes                | Risk assessment | Control implemented |

| Section                                    | Control  | Control description  | Control applicable | Justification   | Control status      |
|--|--|--|--------------------|-----------------|---------------------|
| A.7.2 During employment                    | A.7.2.1 Management responsibilities                            | Management shall require all employees and contractors to apply information security in accordance with the established policies and procedures of the organization.   | Yes                | Risk assessment | Control implemented |
|  | A.7.2.2 Information security awareness, education and training | All employees of the organization and, where relevant, contractors shall receive appropriate awareness education and training and regular updates in organizational policies and procedures, as relevant for their job function. | Yes                | Risk assessment | Control implemented |
|  | A.7.2.3 Disciplinary process                                   | There shall be a formal and communicated disciplinary process in place to take action against employees who have committed an information security breach.   | Yes                | Risk assessment | Control implemented |
| A.7.3 Termination and change of employment | A.7.3.1 Termination or change of employment responsibilities   | Information security responsibilities and duties that remain valid after termination or change of employment shall be defined, communicated to the employee or contractor and enforced.  | Yes                | Risk assessment | Control implemented |
|  | <b>Totals:</b>   |  | <b>6</b>           |                 | <b>6</b>            |
| <b>A.8 Asset management</b>                |  |  |                    |                 |                     |
| A.8.1 Responsibility for assets            | A.8.1.1 Inventory of assets                                    | Assets associated with information and information processing facilities shall be identified and an inventory of these assets shall be drawn up and maintained.  | Yes                | Risk assessment | Control implemented |
|  | A.8.1.2 Ownership of assets                                    | Assets maintained in the inventory shall be owned.   | Yes                | Risk assessment | Control implemented |

| Section                          | Control                               | Control description   | Control applicable | Justification                            | Control status      |
|----------------------------------|---------------------------------------|---|--------------------|--|---------------------|
|                                  | A.8.1.3 Acceptable use of assets      | Rules for the acceptable use of information and of assets associated with information and information processing facilities shall be identified, documented and implemented.        | Yes                | Risk assessment, contractual obligations | Control implemented |
|                                  | A.8.1.4 Return of assets              | All employees and external party users shall return all of the organizational assets in their possession upon termination of their employment, contract or agreement.               | Yes                | Risk assessment                          | Control implemented |
| A.8.2 Information classification | A.8.2.1 Classification of information | Information shall be classified in terms of legal requirements, value, criticality and sensitivity to unauthorised disclosure or modification.                                      | Yes                | Risk assessment                          | Control implemented |
|                                  | A.8.2.2 Labelling of information      | An appropriate set of procedures for information labelling shall be developed and implemented in accordance with the information classification scheme adopted by the organization. | Yes                | Risk assessment                          | Control implemented |
|                                  | A.8.2.3 Handling of assets            | Procedures for handling assets shall be developed and implemented in accordance with the information classification scheme adopted by the organization.                             | Yes                | Risk assessment                          | Control implemented |
| A.8.3 Media Handling             | A.8.3.1 Management of removable media | Procedures shall be implemented for the management of removable media in accordance with the classification scheme adopted by the organization.                                     | Yes                | Risk assessment                          | Control implemented |
|                                  | A.8.3.2 Disposal of media             | Media shall be disposed of securely when no longer required, using formal procedures.   | Yes                | Risk assessment                          | Control implemented |

| Section                                       | Control  | Control description  | Control applicable | Justification                            | Control status      |
|---|--|--|--------------------|--|---------------------|
|   | A.8.3.3 Physical media transfer                                  | Media containing information shall be protected against unauthorized access, misuse or corruption during transportation.                         | Yes                | Risk assessment                          | Control implemented |
|   | <b>Totals:</b>   |  | <b>10</b>          |  | <b>10</b>           |
| <b>A.9 Access control</b>                     |  |  |                    |  |                     |
| A.9.1 Business requirements of access control | A.9.1.1 Access control policy                                    | An access control policy shall be established, documented and reviewed based on business and information security requirements.                  | Yes                | Risk assessment, contractual obligations | Control implemented |
|   | A.9.1.2 Access to networks and network services                  | Users shall only be provided with access to the network and network services that they have been specifically authorized to use.                 | Yes                | Risk assessment, contractual obligations | Control implemented |
| A.9.2 User access management                  | A.9.2.1 User registration and de-registration                    | A formal user registration and de-registration process shall be implemented to enable assignment of access rights.                               | Yes                | Risk assessment                          | Control implemented |
|   | A.9.2.2 User access provisioning                                 | A formal user access provisioning process shall be implemented to assign or revoke access rights for all user types to all systems and services. | Yes                | Risk assessment                          | Control implemented |
|   | A.9.2.3 Management of privileged access rights                   | The allocation and use of privileged access rights shall be restricted and controlled.   | Yes                | Risk assessment, contractual obligations | Control implemented |
|   | A.9.2.4 Management of secret authentication information of users | The allocation of secret authentication information shall be controlled through a formal management process.                                     | Yes                | Risk assessment                          | Control implemented |

| Section                                     | Control  | Control description   | Control applicable | Justification                            | Control status      |
|---|--|---|--------------------|--|---------------------|
|   | A.9.2.5 Review of user access rights             | Asset owners shall review users' access rights at regular intervals.  | Yes                | Risk assessment                          | Control implemented |
|   | A.9.2.6 Removal or adjustment of access rights   | The access rights of all employees and external party users to information and information processing facilities shall be removed upon termination of their employment, contract or agreement, or adjusted upon change. | Yes                | Risk assessment                          | Control implemented |
| A.9.3 User responsibilities                 | A.9.3.1 Use of secret authentication information | Users shall be required to follow the organization's practices in the use of secret authentication information.   | Yes                | Risk assessment                          | Control implemented |
| A.9.4 System and application access control | A.9.4.1 Information access restriction           | Access to information and application system functions shall be restricted in accordance with the access control policy.  | Yes                | Risk assessment                          | Control implemented |
|   | A.9.4.2 Secure log-on procedures                 | Where required by the access control policy, access to systems and applications shall be controlled by a secure log-on procedure.   | Yes                | Risk assessment                          | Control implemented |
|   | A.9.4.3 Password management system               | Password management systems shall be interactive and shall ensure quality passwords.  | Yes                | Risk assessment, contractual obligations | Control implemented |
|   | A.9.4.4 Use of privileged utility programs       | The use of utility programs that might be capable of overriding system and application controls shall be restricted and tightly controlled.   | Yes                | Risk assessment                          | Control implemented |
|   | A.9.4.5 Access control to program source code    | Access to program source code shall be restricted.  | Yes                | Risk assessment                          | Control implemented |
|   | <b>Totals:</b>                                   |   | <b>14</b>          |  | <b>14</b>           |



| Section   | Control  | Control description   | Control applicable | Justification                             | Control status      |
|---|--|---|--------------------|---|---------------------|
| <b>A.10 Cryptography</b>                        |  |   |                    |   |                     |
| A.10.1 Cryptographic controls                   | A.10.1.1 Policy on the use of cryptographic controls           | A policy on the use of cryptographic controls for protection of information shall be developed and implemented.   | Yes                | Risk assessment / Contractual obligations | Control implemented |
|   | A.10.1.2 Key management  | A policy on the use, protection and lifetime of cryptographic keys shall be developed and implemented through their whole lifecycle.                        | Yes                | Risk assessment / Contractual obligations | Control implemented |
|   | <b>Totals:</b>   |   | <b>2</b>           |   | <b>2</b>            |
| <b>A.11 Physical and environmental security</b> |  |   |                    |   |                     |
| A.11.1 Secure areas                             | A.11.1.1 Physical security perimeter                           | Security perimeters shall be defined and used to protect areas that contain either sensitive or critical information and information processing facilities. | Yes                | Risk assessment / Contractual obligations | Control implemented |
|   | A.11.1.2 Physical entry controls                               | Secure areas shall be protected by appropriate entry controls to ensure that only authorized personnel are allowed access.                                  | Yes                | Risk assessment / Contractual obligations | Control implemented |
|   | A.11.1.3 Securing offices, rooms and facilities                | Physical security for offices, rooms and facilities shall be designed and applied.  | Yes                | Risk assessment / Contractual obligations | Control implemented |
|   | A.11.1.4 Protecting against external and environmental threats | Physical protection against natural disasters, malicious attack or accidents shall be designed and applied.   | Yes                | Risk assessment / Contractual obligations | Control implemented |
|   | A.11.1.5 Working in secure areas                               | Procedures for working in secure areas shall be designed and applied.   | Yes                | Risk assessment                           | Control implemented |

| Section          | Control  | Control description   | Control applicable | Justification   | Control status      |
|------------------|--|---|--------------------|-----------------|---------------------|
|                  | A.11.1.6 Delivery and loading areas                    | Access points such as delivery and loading areas and other points where unauthorized persons could enter the premises shall be controlled and, if possible, isolated from information processing facilities to avoid unauthorized access. | Yes                | Risk assessment | Control implemented |
| A.11.2 Equipment | A.11.2.1 Equipment siting and protection               | Equipment shall be sited and protected to reduce the risks from environmental threats and hazards, and opportunities for unauthorized access.   | Yes                | Risk assessment | Control implemented |
|                  | A.11.2.2 Supporting utilities                          | Equipment shall be protected from power failures and other disruptions caused by failures in supporting utilities.  | Yes                | Risk assessment | Control implemented |
|                  | A.11.2.3 Cabling security                              | Power and telecommunications cabling carrying data or supporting information services shall be protected from interception, interference or damage.   | Yes                | Risk assessment | Control implemented |
|                  | A.11.2.4 Equipment maintenance                         | Equipment shall be correctly maintained to ensure its continued availability and integrity.   | Yes                | Risk assessment | Control implemented |
|                  | A.11.2.5 Removal of assets                             | Equipment, information or software shall not be taken off-site without prior authorization.   | Yes                | Risk assessment | Control implemented |
|                  | A.11.2.6 Security of equipment and assets off-premises | Security shall be applied to off-site assets taking into account the different risks of working outside the organization's premises.  | Yes                | Risk assessment | Control implemented |
|                  | A.11.2.7 Secure disposal or reuse of equipment         | All items of equipment containing storage media shall be verified to ensure that any sensitive data and licensed software has been  | Yes                | Risk assessment | Control implemented |

|  |  | removed or securely overwritten prior to disposal or re-use.  |                    |   |                     |
|--|--|---|--------------------|---|---------------------|
| Section  | Control  | Control description   | Control applicable | Justification                             | Control status      |
|  | A.11.2.8 Unattended user equipment                                       | Users shall ensure that unattended equipment has appropriate protection.  | Yes                | Risk assessment                           | Control implemented |
|  | A.11.2.9 Clear desk and clear screen policy                              | A clear desk policy for papers and removable storage media and a clear screen policy for information processing facilities shall be adopted.                | Yes                | Risk assessment                           | Control implemented |
|  | <b>Totals:</b>   |   | <b>15</b>          |   | <b>15</b>           |
| <b>A.12 Operations security</b>                    |  |   |                    |   |                     |
| A.12.1 Operational procedures and responsibilities | A.12.1.1 Documented operating procedures                                 | Operating procedures shall be documented and made available to all users who need them.   | Yes                | Risk assessment                           | Control implemented |
|  | A.12.1.2 Change management   | Changes to the organization, business processes, information processing facilities and systems that affect information security shall be controlled.        | Yes                | Risk assessment                           | Control implemented |
|  | A.12.1.3 Capacity management   | The use of resources shall be monitored, tuned and projections made of future capacity requirements to ensure the required system performance.              | Yes                | Risk assessment                           | Control implemented |
|  | A.12.1.4 Separation of development, testing and operational environments | Development, testing, and operational environments shall be separated to reduce the risks of unauthorized access or changes to the operational environment. | Yes                | Risk assessment / Contractual obligations | Control implemented |
| A.12.2 Protection from malware                     | A.12.2.1 Controls against malware  | Detection, prevention and recovery controls to protect against malware shall be implemented,  | Yes                | Risk assessment / Contractual             | Control implemented |

| Section                                   | Control  | Control description   | Control applicable | Justification                             | Control status      |
|---|--|---|--------------------|---|---------------------|
|   |  | combined with appropriate user awareness.   |                    | obligations                               |                     |
| A.12.3 Backup                             | A.12.3.1 Information backup                              | Backup copies of information, software and system images shall be taken and tested regularly in accordance with an agreed backup policy.  | Yes                | Risk assessment / Contractual obligations | Control implemented |
| A.12.4 Logging and monitoring             | A.12.4.1 Event logging                                   | Event logs recording user activities, exceptions, faults and information security events shall be produced, kept and regularly reviewed.  | Yes                | Risk assessment, legal requirement        | Control implemented |
|   | A.12.4.2 Protection of log information                   | Logging facilities and log information shall be protected against tampering and unauthorized access.  | Yes                | Risk assessment, legal requirement        | Control implemented |
|   | A.12.4.3 Administrator and operator logs                 | System administrator and system operator activities shall be logged and the logs protected and regularly reviewed.  | Yes                | Risk assessment                           | Control implemented |
|   | A.12.4.4 Clock synchronisation                           | The clocks of all relevant information processing systems within an organization or security domain shall be synchronised to a single reference time source.  | Yes                | Risk assessment                           | Control implemented |
| A.12.5 Control of operational software    | A.12.5.1 Installation of software on operational systems | Procedures shall be implemented to control the installation of software on operational systems.   | Yes                | Risk assessment                           | Control implemented |
| A.12.6 Technical vulnerability management | A.12.6.1 Management of technical vulnerabilities         | Information about technical vulnerabilities of information systems being used shall be obtained in a timely fashion, the organization's exposure to such vulnerabilities evaluated and appropriate measures taken to address the associated risk. | Yes                | Risk assessment, contractual obligations  | Control implemented |

| Section   | Control   | Control description  | Control applicable | Justification   | Control status      |
|---|---|--|--------------------|-----------------|---------------------|
|   | A.12.6.2 Restrictions on software installation        | Rules governing the installation of software by users shall be established and implemented.  | Yes                | Risk assessment | Control implemented |
| A.12.7 Information systems audit considerations | A.12.7.1 Information systems audit controls           | Audit requirements and activities involving verification of operational systems shall be carefully planned and agreed to minimise disruptions to business processes.   | Yes                | Risk assessment | Control implemented |
|   | <b>Totals:</b>  |  | <b>14</b>          |                 | <b>14</b>           |
| <b>A.13 Communications security</b>             |   |  |                    |                 |                     |
| A.13.1 Network security management              | A.13.1.1 Network controls                             | Networks shall be managed and controlled to protect information in systems and applications.   | Yes                | Risk assessment | Control implemented |
|   | A.13.1.2 Security of network services                 | Security mechanisms, service levels and management requirements of all network services shall be identified and included in network services agreements, whether these services are provided in-house or outsourced. | Yes                | Risk assessment | Control implemented |
|   | A.13.1.3 Segregation in networks                      | Groups of information services, users and information systems shall be segregated on networks.   | Yes                | Risk assessment | Control implemented |
| A.13.2 Information transfer                     | A.13.2.1 Information transfer policies and procedures | Formal transfer policies, procedures and controls shall be in place to protect the transfer of information through the use of all types of communication facilities.   | Yes                | Risk assessment | Control implemented |

| Section   | Control   | Control description   | Control applicable | Justification                            | Control status      |
|---|---|---|--------------------|--|---------------------|
|   | A.13.2.2 Agreements on information transfer                           | Agreements shall address the secure transfer of business information between the organization and external parties.   | Yes                | Risk assessment                          | Control implemented |
|   | A.13.2.3 Electronic messaging   | Information involved in electronic messaging shall be appropriately protected.  | Yes                | Risk assessment, contractual obligations | Control implemented |
|   | A.13.2.4 Confidentiality or nondisclosure agreements                  | Requirements for confidentiality or non-disclosure agreements reflecting the organization's needs for the protection of information shall be identified, regularly reviewed and documented. | Yes                | Risk assessment, contractual obligations | Control implemented |
|   | <b>Totals:</b>  |   | <b>7</b>           |  | <b>7</b>            |
| <b>A.14 System acquisition, development and maintenance</b> |   |   |                    |  |                     |
| A.14.1 Security requirements of information systems         | A.14.1.1 Information security requirements analysis and specification | The information security related requirements shall be included in the requirements for new information systems or enhancements to existing information systems.                            | Yes                | Risk assessment                          | Control implemented |
|   | A.14.1.2 Securing application services on public networks             | Information involved in application services passing over public networks shall be protected from fraudulent activity, contract dispute and unauthorized disclosure and modification.       | Yes                | Risk assessment                          | Control implemented |

| Section  | Control  | Control description  | Control applicable | Justification                            | Control status      |
|--|--|--|--------------------|--|---------------------|
|  | A.14.1.3 Protecting application services transactions                      | Information involved in application service transactions shall be protected to prevent incomplete transmission, mis-routing, unauthorized message alteration, unauthorized disclosure, unauthorized message duplication or replay. | Yes                | Risk assessment                          | Control implemented |
| A.14.2 Security in development and support processes | A.14.2.1 Secure development policy   | Rules for the development of software and systems shall be established and applied to developments within the organization.  | Yes                | Risk assessment, contractual obligations | Control implemented |
|  | A.14.2.2 System change control procedures                                  | Changes to systems within the development lifecycle shall be controlled by the use of formal change control procedures.  | Yes                | Risk assessment, contractual obligations | Control implemented |
|  | A.14.2.3 Technical review of applications after operating platform changes | When operating platforms are changed, business critical applications shall be reviewed and tested to ensure there is no adverse impact on organizational operations or security.   | Yes                | Risk assessment                          | Control implemented |
|  | A.14.2.4 Restrictions on changes to software packages                      | Modifications to software packages shall be discouraged, limited to necessary changes and all changes shall be strictly controlled.  | Yes                | Risk assessment                          | Control implemented |
|  | A.14.2.5 Secure system engineering principles                              | Principles for engineering secure systems shall be established, documented, maintained and applied to any information system implementation efforts.   | Yes                | Risk assessment                          | Control implemented |
|  | A.14.2.6 Secure development environment                                    | Organizations shall establish and appropriately protect secure development environments for system development and integration efforts   | Yes                | Risk assessment                          | Control implemented |

|   |   | that cover the entire system development life cycle.  |                    |  |                     |
|---|---|---|--------------------|--|---------------------|
| Section   | Control   | Control description   | Control applicable | Justification                            | Control status      |
|   | A.14.2.7 Outsourced development                                 | The organization shall supervise and monitor the activity of outsourced system development.   | Yes                | Risk assessment                          | Control implemented |
|   | A.14.2.8 System security testing                                | Testing of security functionality shall be carried out during development.  | Yes                | Risk assessment, contractual obligations | Control implemented |
|   | A.14.2.9 System acceptance testing                              | Acceptance testing programs and related criteria shall be established for new information systems, upgrades and new versions.   | Yes                | Risk assessment, contractual obligations | Control implemented |
| A.14.3 Test data                                      | A.14.3.1 Protection of test data                                | Test data shall be selected carefully, protected and controlled.  | Yes                | Risk assessment, contractual obligations | Control implemented |
|   | <b>Totals:</b>  |   | <b>13</b>          |  | <b>13</b>           |
| <b>A.15 Supplier relationships</b>                    |   |   |                    |  |                     |
| A.15.1 Information security in supplier relationships | A.15.1.1 Information security policy for supplier relationships | Information security requirements for mitigating the risks associated with supplier's access to the organization's assets shall be agreed with the supplier and documented.   | Yes                | Risk assessment, contractual obligations | Control implemented |
|   | A.15.1.2 Addressing security within supplier agreements         | All relevant information security requirements shall be established and agreed with each supplier that may access, process, store, communicate, or provide IT infrastructure components for the organization's information. | Yes                | Risk assessment, contractual obligations | Control implemented |



| Section  | Control  | Control description   | Control applicable | Justification                            | Control status      |
|--|--|---|--------------------|--|---------------------|
|  | A.15.1.3 Information and communication technology supply chain | Agreements with suppliers shall include requirements to address the information security risks associated with information and communications technology services and product supply chain.   | Yes                | Risk assessment, contractual obligations | Control implemented |
| A.15.2 Supplier service delivery management                          | A.15.2.1 Monitoring and review of supplier services            | Organizations shall regularly monitor, review and audit supplier service delivery.  | Yes                | Risk assessment, contractual obligations | Control implemented |
|  | A.15.2.2 Managing changes to supplier services                 | Changes to the provision of services by suppliers, including maintaining and improving existing information security policies, procedures and controls, shall be managed, taking account of the criticality of business information, systems and processes involved and re-assessment of risks. | Yes                | Risk assessment, contractual obligations | Control implemented |
|  | <b>Totals:</b>   |   | <b>5</b>           |  | <b>5</b>            |
| <b>A.16 Information security incident management</b>                 |  |   |                    |  |                     |
| A.16.1 Management of information security incidents and improvements | A.16.1.1 Responsibilities and procedures                       | Management responsibilities and procedures shall be established to ensure a quick, effective and orderly response to information security incidents.  | Yes                | Risk assessment, legal requirement       | Control implemented |
|  | A.16.1.2 Reporting information security events                 | Information security events shall be reported through appropriate management channels as quickly as possible.   | Yes                | Risk assessment, legal requirement       | Control implemented |

| Section | Control  | Control description  | Control applicable | Justification                      | Control status      |
|---------|--|--|--------------------|------------------------------------|---------------------|
|         | A.16.1.3 Reporting information security weaknesses                 | Employees and contractors using the organization's information systems and services shall be required to note and report any observed or suspected information security weaknesses in systems or services. | Yes                | Risk assessment, legal requirement | Control implemented |
|         | A.16.1.4 Assessment of and decision on information security events | Information security events shall be assessed and it shall be decided if they are to be classified as information security incidents.  | Yes                | Risk assessment, legal requirement | Control implemented |
|         | A.16.1.5 Response to information security incidents                | Information security incidents shall be responded to in accordance with the documented procedures.   | Yes                | Risk assessment, legal requirement | Control implemented |
|         | A.16.1.6 Learning from information security incidents              | Knowledge gained from analysing and resolving information security incidents shall be used to reduce the likelihood or impact of future incidents.   | Yes                | Risk assessment, legal requirement | Control implemented |
|         | A.16.1.7 Collection of evidence                                    | The organization shall define and apply procedures for the identification, collection, acquisition and preservation of information, which can serve as evidence.   | Yes                | Risk assessment, legal requirement | Control implemented |
|         | <b>Totals:</b>   |  | <b>7</b>           |                                    | <b>7</b>            |

| Section  | Control  | Control description   | Control applicable | Justification                            | Control status      |
|--|--|---|--------------------|--|---------------------|
| <b>A.17 Information security aspects of business continuity management</b> |  |   |                    |  |                     |
| A.17.1 Information security continuity                                     | A.17.1.1 Planning information security continuity                    | The organization shall determine its requirements for information security and the continuity of information security management in adverse situations, e.g. during a crisis or disaster.                   | Yes                | Risk assessment                          | Control implemented |
|  | A.17.1.2 Implementing information security continuity                | The organization shall establish, document, implement and maintain processes, procedures and controls to ensure the required level of continuity for information security during an adverse situation.      | Yes                | Risk assessment, contractual obligations | Control implemented |
|  | A.17.1.3 Verify, review and evaluate information security continuity | The organization shall verify the established and implemented information security continuity controls at regular intervals in order to ensure that they are valid and effective during adverse situations. | Yes                | Risk assessment, contractual obligations | Control implemented |
| A.17.2 Redundancies  | A.17.2.1 Availability of information processing facilities           | Information processing facilities shall be implemented with redundancy sufficient to meet availability requirements.  | Yes                | Risk assessment                          | Control implemented |
|  | <b>Totals:</b>   |   | <b>4</b>           |  | <b>4</b>            |

| Section   | Control  | Control description  | Control applicable | Justification                      | Control status      |
|---|--|--|--------------------|------------------------------------|---------------------|
| <b>A.18 Compliance</b>                                    |  |  |                    |                                    |                     |
| A.18.1 Compliance with legal and contractual requirements | A.18.1.1 Identification of applicable legislation and contractual requirements | All relevant legislative statutory, regulatory, contractual requirements and the organization's approach to meet these requirements shall be explicitly identified, documented and kept up to date for each information system and the organization. | Yes                | Risk assessment, legal requirement | Control implemented |
|   | A.18.1.2 Intellectual property rights  | Appropriate procedures shall be implemented to ensure compliance with legislative, regulatory and contractual requirements related to intellectual property rights and use of proprietary software products.   | Yes                | Legal requirement                  | Control implemented |
|   | A.18.1.3 Protection of records   | Records shall be protected from loss, destruction, falsification, unauthorized access and unauthorized release, in accordance with legislative, regulatory, contractual and business requirements.   | Yes                | Legal requirement                  | Control implemented |
|   | A.18.1.4 Privacy and protection of personally identifiable information         | Privacy and protection of personally identifiable information shall be ensured as required in relevant legislation and regulation where applicable.  | Yes                | Legal requirement                  | Control implemented |
|   | A.18.1.5 Regulation of cryptographic controls                                  | Cryptographic controls shall be used in compliance with all relevant agreements, legislation and regulations.  | Yes                | Legal requirement                  | Control implemented |

| Section                             | Control  | Control description  | Control applicable | Justification   | Control status      |
|-------------------------------------|--|--|--------------------|-----------------|---------------------|
| A.18.2 Information security reviews | A.18.2.1 Independent review of information security      | The organization's approach to managing information security and its implementation (i.e. control objectives, controls, policies, processes and procedures for information security) shall be reviewed independently at planned intervals or when significant changes occur. | Yes                | Risk assessment | Control implemented |
|                                     | A.18.2.2 Compliance with security policies and standards | Managers shall regularly review the compliance of information processing and procedures within their area of responsibility with the appropriate security policies, standards and any other security requirements.   | Yes                | Risk assessment | Control implemented |
|                                     | A.18.2.3 Technical compliance review                     | Information systems shall be regularly reviewed for compliance with the organization's information security policies and standards.  | Yes                | Risk assessment | Control implemented |
|                                     | <b>Totals:</b>   |  | <b>8</b>           |                 | <b>8</b>            |