			ISMS	Reasons for Selection		
	ISO	27001 / WLA Controls	Applicable	LR/CO	BR/BP	RA
Clause	Sec	Control Objective / Control				
	Mandat	tory Clauses				
	1	Scope	Yes	1	Х	Ι
	2	Normative References	Yes		X	
	3	Terms and Definitions	Yes		Х	
4.40.44	4	Context of the Organization	Yes		Х	
1-10 Mandatory	5	Leadership	Yes		Х	
Clauses	6	Planning	Yes		Х	
	7	Support	Yes		Х	
	8	Operation	Yes		Χ	
	9	Performance Evaluation	Yes		Χ	
	10	Improvement	Yes		Χ	
	г 1	Information Convity Delice				
5 O Security Policy	5.1	Information Security Policy	Voc		V	
5.0 Security Policy	5.1.1 5.1.2	Information Security Policy Document Review of Information Security Policy	Yes Yes		X	
	5.1.2	Review of information Security Policy	res		۸	
	6.1	Internal Organization				
	6.1.1	Information Security roles and responsibilties	Yes		Х	
	6.1.2	Segregation of duties	Yes		Х	
6.0 Organization of	6.1.3	Contact with authorities	Yes		Χ	
Information Security	6.1.4	Contact with special interest groups	Yes		Χ	
	6.1.5	Information Security in project management	Yes		Χ	
	6.2	Mobile devices and teleworking				
	6.2.1	Mobile device policy	Yes		Х	
	6.2.2	Teleworking	Yes		Х	
	7.1	Prior to Employment				
	7.1.1	Screening	Yes		Х	Х
	7.1.2	Terms and conditions of employment	Yes	Х	Х	Х
	7.2	During Employment				
7.0 Human Resource	7.2.1	Management Responsibility	Yes		Х	
Security	7.2.2	Information security awareness, education and training	Yes		Х	х
	7.2.3	Disciplinary process	Yes	Χ	Х	
	7.3	Termination or change of employment				
	7.3.1	Termination or change of employment responsibilities	Yes		Х	
	8.1	Responsibility for Assets			Χ	
	8.1.1	Inventory of assets	Yes		Х	
	8.1.2	Ownership of Assets	Yes	Χ	Х	
8.0 Asset Management	8.1.3	Acceptable use of assets	Yes	Х	Х	
	8.1.4	Return of assets	Yes			
	8.2	Information classification			X	
	8.2.1	Classification Guidelines	Yes		Х	
	8.2.2	Information Labeling and Handling	Yes		V	
	8.3	Media Handling Management of removable media	Voc		X	
	8.3.1 8.3.2	Management of removable media Disposal of media	Yes Yes	 	X	
	8.3.3	Physical media transfer	Yes		_^	
	5.5.5	,	. 25			
	9.1	Business Requirement for Access Control				
	J. 2			_	_	
	9.1.1 9.1.2	Access control Policy Access to networks and network service	Yes	X X	X	

Ī		1			1	
	9.2	User Access Management				
	9.2.1	User Registration and de-registration	Yes		Х	Х
	9.2.2	User access provisioning	Yes		Χ	Х
	9.2.3	Management of priviledged access rights	Yes		Χ	Х
	9.2.4	Management of secret authentication	Yes		х	х
	5.2.4	information for	163		^	^
9.0 Access Control	9.2.5	Review of user access rights	Yes		Х	Х
	9.2.6	Removal of access rights	Yes		Х	Х
	9.3	User Responsibilities				
	9.3.1	Use of secret authentication information	Yes		Χ	Х
	9.4	System and application access control				
	9.4.1	Information access restriction	Yes		Х	
	9.4.2	Secure log-on procedures	Yes		Х	
	9.4.3	Password Management system	Yes	Х	Х	Х
	9.4.4	Use of priviledged utility programs	Yes		Х	
	9.4.5	Access control to program source code	Yes		Х	
	31 113	resease some or to program source sour	. 03			
	10.1	Cryptographic Controls				
A.10 Cryptographic	10.1.1	Policy on use of cryptographic controls	Yes		Х	
Controls	10.1.2	Key Management	Yes		Х	
		,				
	11.1	Secure areas				
	11.1.1	Physical Security perimeter	Yes	Х	Х	
	11.1.2	Physical Entry Controls	Yes		Х	
	11.1.3	Securing offices, rooms and facilities	Yes		Х	
		Protecting against external and	103			
	11.1.4	environmental threats	Yes		Х	
	11.1.5	Working in secure areas	Yes	1	Х	
	11.1.6	Delivery and loading areas	Yes		X	
A.11 Physical and	11.1.0		162		^	
Environmental		Equipment	V		V	
	11.2.1	Equipment sitting and protection	Yes		X	
Security	11.2.2	Support utilities	Yes		X	
	11.2.3	Cabling security	Yes	ł	Х	
	11.2.4	Equipment Maintenance	Yes	<u> </u>	Х	Х
	11.2.5	Removal of assets	Yes		Х	
	11.2.6	Security of equipment and assets off-premises	Yes		Х	Х
	11.2.7	Secure disposal or reuse of equipment	Yes	Х	Х	
	11.2.8	Unattended user equipment	Yes		Х	Х
	11.2.9	Clear Desk and Clear Screen Policy	Yes		Х	
	12.1	Operational Procedures and responsibilties				
	12.1.1	Documented operating Procedures	Yes		Χ	
	12.1.2	Change Management	Yes		Χ	
A.12 Operations Security	12.1.3	Capacity management	Yes	Χ	Χ	
	12.1.4	Separation of development, testing and	Voc		v	v
	12.1.4	operational environments	Yes		Х	Х
	12.2	Protection from malware				
	12.2.1	Controls against malware	Yes		Х	
	12.3	Backup				
	12.3.1	Information Backup	Yes	Х	Х	
	12.4	Logging and monitoring	. 55			
	12.4.1	Event Logging	Yes		Х	Х
	12.4.2	Protection of log information	Yes		X	X
	12.4.2	Administrator and operator logs	Yes	1	X	^
	12.4.4		Yes	1	X	
		Clock synchronization	162		^	
	12.5	Control of operational software				
	12.5.1	Installation of software on operational	Yes		Х	Х
		systems		1		
	10.5	·				
	12.6	Technical Vulnerabilty management				
	12.6 12.6.1 12.6.2	·	Yes Yes		X	

ı	12.7					
	12.7	Information Customs audit controls	Voc		V	V
	12.7.1	Information Systems audit controls	Yes		Х	Х
	13.1	Network security management				
	13.1.1	Network controls	Yes		Х	Х
	13.1.2	Security of network services	Yes		X	^
	13.1.3	Segretion of networks	Yes		X	Х
A.13 Communications	13.1.3	Information Transfer	163		^	۸
Security	13.2.1	Information Transfer policies and procedures	Yes		Х	
	13.2.2	Agreements on information transfer	Yes		X	
	13.2.3	Electronic Messaging	Yes		X	Х
	13.2.4	Confidentiality or non-disclosure agreements	Yes		^	
		Security Requirements of Information				
	14.1	Systems				
		Information Security requirements analysis				
	14.1.1	and specification	Yes		Х	
		Securing application services on public				
	14.1.2		Yes		Χ	
	1112	networks				
	14.1.3	Protecting Application Services transactions	Yes		Х	
	14.2	Security in Development & Support Processes				
A 14 Custom	1121	Control of the state of the sta				
A.14 System	14.2.1	Secure development policy	Yes		X	
Acquisition,	14.2.2	System change Control Procedures	Yes		Х	Х
development and	14.2.3	Technical review of applications after	Yes		Х	Х
maintenance		Operating system				
	14.2.4	Restrictions on changes to software packages	Yes		Х	Х
	14.2.5	Secure system engineering principles	Yes		Χ	Х
	14.2.6	Secure development environment	Yes		Χ	Χ
	14.2.7	Outsourced development	No			
					\ <u>'</u>	
	14.2.8	System Security testing	Yes		Х	
	14.2.8 14.2.9	System acceptance testing	Yes		X	
		1				
	14.2.9	System acceptance testing		X		X
	14.2.9 14.3	System acceptance testing Test Data Protection of system test data	Yes	X	Х	X
	14.2.9 14.3	System acceptance testing Test Data	Yes	X	Х	X
	14.2.9 14.3 14.3.1	System acceptance testing Test Data Protection of system test data	Yes Yes	X	X	X
	14.2.9 14.3 14.3.1	System acceptance testing Test Data Protection of system test data Information Security in supplier relationships	Yes	X	Х	X
	14.2.9 14.3 14.3.1 15.1 15.1.1	System acceptance testing Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier	Yes Yes Yes	X	X X	X
A.15 Supplier	14.2.9 14.3 14.3.1	System acceptance testing Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships	Yes Yes	X	X	X
A.15 Supplier Relationships	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2	System acceptance testing Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier	Yes Yes Yes Yes	X	X X X	X
	14.2.9 14.3 14.3.1 15.1 15.1.1	System acceptance testing Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements	Yes Yes Yes	X	X X	X
	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2	System acceptance testing Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain	Yes Yes Yes Yes	X	X X X	X
	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3	System acceptance testing Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain Supplier service delivery management	Yes Yes Yes Yes	X	X X X	X
	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3 15.2	System acceptance testing Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain	Yes Yes Yes Yes Yes	X	x x x	X
	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3 15.2 15.2.1	System acceptance testing Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain Supplier service delivery management Monitoring and review of supplier services	Yes Yes Yes Yes Yes Yes	X	x x x x x x	X
	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3 15.2 15.2.1 15.2.2	System acceptance testing Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain Supplier service delivery management Monitoring and review of supplier services	Yes Yes Yes Yes Yes Yes	X	x x x x x x	X
	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3 15.2 15.2.1	System acceptance testing Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain Supplier service delivery management Monitoring and review of supplier services Managing changes to supplier services	Yes Yes Yes Yes Yes Yes	X	x x x x x x	X
	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3 15.2 15.2.1 15.2.2	System acceptance testing Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain Supplier service delivery management Monitoring and review of supplier services Managing changes to supplier services Management of Information Security	Yes Yes Yes Yes Yes Yes	X	x x x x x x	X
	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3 15.2 15.2.1 15.2.1	System acceptance testing Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain Supplier service delivery management Monitoring and review of supplier services Managing changes to supplier services Management of Information Security Incidents and Improvements Responsibilities and Procedures	Yes Yes Yes Yes Yes Yes Yes	X	X X X X X	X
= =	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3 15.2 15.2.1 15.2.1 16.1.1 16.1.1	System acceptance testing Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain Supplier service delivery management Monitoring and review of supplier services Managing changes to supplier services Management of Information Security Incidents and Improvements Responsibilities and Procedures Reporting Information security events	Yes	X	x x x x x x x x	X
Relationships	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3 15.2 15.2.1 16.1.1 16.1.1	Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain Supplier service delivery management Monitoring and review of supplier services Managing changes to supplier services Management of Information Security Incidents and Improvements Responsibilities and Procedures Reporting Information security events Reporting security weaknesses	Yes Yes Yes Yes Yes Yes Yes Yes Yes	X	X X X X X X	X
A.16 Information Security Incident	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3 15.2 15.2.1 15.2.2 16.1 16.1.1 16.1.2 16.1.3	Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain Supplier service delivery management Monitoring and review of supplier services Managing changes to supplier services Management of Information Security Incidents and Improvements Responsibilities and Procedures Reporting Information security events Reporting security weaknesses Assesment of and decision on information	Yes	X	x x x x x x x x x	X
Relationships A.16 Information	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3 15.2 15.2.1 15.2.1 16.1.1 16.1.1	Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain Supplier service delivery management Monitoring and review of supplier services Managing changes to supplier services Management of Information Security Incidents and Improvements Responsibilities and Procedures Reporting Information security events Reporting security weaknesses Assesment of and decision on information security	Yes	X	x x x x x x x x	X
Relationships A.16 Information Security Incident	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3 15.2 15.2.1 15.2.2 16.1 16.1.1 16.1.2 16.1.3 16.1.4	Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain Supplier service delivery management Monitoring and review of supplier services Managing changes to supplier services Management of Information Security Incidents and Improvements Responsibilities and Procedures Reporting Information security events Reporting security weaknesses Assesment of and decision on information security incidents	Yes	X	x x x x x x x x x	X
A.16 Information Security Incident	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3 15.2 15.2.1 15.2.2 16.1 16.1.1 16.1.2 16.1.3 16.1.4	Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain Supplier service delivery management Monitoring and review of supplier services Managing changes to supplier services Management of Information Security Incidents and Improvements Responsibilities and Procedures Reporting Information security events Responsibilities and decision on information security incidents Response to information security events	Yes	X	x x x x x x x x x x x	X
Relationships A.16 Information Security Incident	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3 15.2 15.2.1 15.2.2 16.1 16.1.1 16.1.2 16.1.3 16.1.4 16.1.5 16.1.6	Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain Supplier service delivery management Monitoring and review of supplier services Managing changes to supplier services Management of Information Security Incidents and Improvements Responsibilities and Procedures Reporting Information security events Response to information on information security incidents Response to information security events Response to information security events Learning for Information security incidents	Yes		x x x x x x x x x x x x	X
Relationships A.16 Information Security Incident	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3 15.2 15.2.1 15.2.2 16.1 16.1.1 16.1.2 16.1.3 16.1.4	Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain Supplier service delivery management Monitoring and review of supplier services Managing changes to supplier services Management of Information Security Incidents and Improvements Responsibilities and Procedures Reporting Information security events Responsibilities and decision on information security incidents Response to information security events	Yes	X	x x x x x x x x x x x	X
Relationships A.16 Information Security Incident	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3 15.2 15.2.1 15.2.2 16.1 16.1.1 16.1.2 16.1.3 16.1.4 16.1.5 16.1.6 16.1.7	Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain Supplier service delivery management Monitoring and review of supplier services Managing changes to supplier services Management of Information Security Incidents and Improvements Responsibilities and Procedures Reporting Information security events Resporting security weaknesses Assesment of and decision on information security incidents Response to information security events Learning for Information security incidents Collection of evidence	Yes		x x x x x x x x x x x x	X
Relationships A.16 Information Security Incident	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3 15.2 15.2.1 15.2.2 16.1 16.1.1 16.1.2 16.1.3 16.1.4 16.1.5 16.1.6 16.1.7	Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain Supplier service delivery management Monitoring and review of supplier services Managing changes to supplier services Management of Information Security Incidents and Improvements Responsibilities and Procedures Reporting Information security events Reporting security weaknesses Assesment of and decision on information security incidents Response to information security events Learning for Information security incidents Collection of evidence Information Security continuity	Yes		x x x x x x x x x x x x	X
Relationships A.16 Information Security Incident	14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2 15.1.3 15.2 15.2.1 15.2.2 16.1 16.1.1 16.1.2 16.1.3 16.1.4 16.1.5 16.1.6 16.1.7	Test Data Protection of system test data Information Security in supplier relationships Information Security Policy for supplier relationships Addressing security within supplier agreements Information and communication technology supply chain Supplier service delivery management Monitoring and review of supplier services Managing changes to supplier services Management of Information Security Incidents and Improvements Responsibilities and Procedures Reporting Information security events Resporting security weaknesses Assesment of and decision on information security incidents Response to information security events Learning for Information security incidents Collection of evidence	Yes		x x x x x x x x x x x x	X

Security Aspects of	17.1.3	Verify, review and evaluate information	Yes		х	
Business Continuity	17.1.3	security continuity	163		^	
Management	17.2	Redundancies				
		Availability of information processing				
	17.2.1	facilities	Yes		Х	
		ladifices				
		Compliance with legal and contractual				
	18.1	_				
		requirements				
		Identification of applicable legislations and				
	18.1.1	contractual	Yes	Х	Х	
		requirements				
	18.1.2	Intellectual Property Rights (IPR)	Yes	Χ	X	
	18.1.3	Protection of records	Yes	Χ	Χ	
A.18 Compliance	18.1.4	Privacy and protection of personally	Yes	X	х	
	10.1.4	identifiable	163	^	^	
	18.1.5	Regulation of cryptographic controls	Yes		Х	
	18.2	Information Security Reviews				
	18.2.1	Independent review of information security	Yes		Х	Х
		Compliance with security policies and				
	18.2.2	standards	Yes		Х	
	18.2.3	Technical compliance checking	Yes	Х	Х	Х
	10.2.5	realification phanee checking	163	^	Λ	Λ.
			ISMS	Reason	s for Se	electio
	ISO 27	018 Annex A Controls	Applicable			
			Аррисавіс	LR/CO	BR/BP	RA
Clause	Sec	Control Objective / Control				
Cidu3C	366	Obligation to co-operate regarding PII				
A.1 Consent	1.1	principals' rights	Yes		Χ	
A 2 Durnaga	2.1	Public Cloud PII Processors Purpose	Yes	+	Х	
A.2 Purpose,	-	·		+		
Legitimacy and	2.2	Public Cloud PII processors commercial use	Yes		Х	
A.3 Collection	3	Limitation of collection	Yes		Χ	
Limitation	1			4		
A.4 Data	4.1	Secure erasure of temporary files	Yes		х	
Minimization		· ·		1		
A.5 Use, Retention	5.1	PII disclosure notification	Yes		Χ	
and Disclosure	5.2	Recording of PII Disclosures	Yes		Х	
A.6 Accuracy and	6	Accuracy and quality	Yes		Χ	
Quality	6.1	Recording of PII Disclosures	Yes		Χ	
A.7 Openness,						
Transparency, and	7.1	Disclosure of subcontracted PII Processing	Yes		Χ	
Notice						
A.8 Individual						
Participation and	8	Individual participation and access	No			
access						
	9.1	Notification of Data Breach involving PII	Yes		Х	
		Retention period for administrative security		\vdash		
A.9 Accountability	9.2	policies and guidelines	Yes		Х	
	9.3	PII Return, transfer and disposal	Yes	+	Х	
	10.1	Confidentiality or non-disclosure agreements	Yes	+	X	
	_			+	X	
	10.2	Restriction on creation of hardcopy material	Yes	+	٨	
	10.3	Control of logging of data restoration	No	+		
	10.4	Protecting data on storage media leaving the	Yes		Х	
		premises		+		
i .		Use of unencrypted portable media and		1	Х	
	10.5		Yes	1 1		
	10.5	devices	Yes		,	
A.10 Information		devices Encryption of PII transmitted over public data			Х	
A.10 Information	10.5 10.6	devices Encryption of PII transmitted over public data transmission networks	Yes			
A.10 Information Security		devices Encryption of PII transmitted over public data				
	10.6	devices Encryption of PII transmitted over public data transmission networks	Yes		Х	
	10.6 10.7	devices Encryption of PII transmitted over public data transmission networks Secure disposal of hardcopy materials	Yes Yes		X	

Statement of Applicability: ISO 27001:2013 and ISO 27018:2014

Version: 4.2.4 - Current as of: 1/28/2020

	10.10	User ID management	Yes	Х	
	10.11	Contract Measures	Yes	Х	
	10.12	Sub-contracted PII Processing	Yes	Х	
	10.13	Access to data on pre-used data storage	Yes	х	
A.11 Privacy	11.1	space Geographical location of PII	Yes	X	
Compliance	11.2	Intended destination of PII	Yes	X	