Review Da	ate —	22-4-2020		
Reference	2	Domain / Section	Control	Reason (not) in-scope
A 5 Inf	ormat	ion security policies		
The state of the s		ment direction for information	COCUPIN	
			r information security in accordance with business requirements and relevo	ant laws and regulations
A.5.1.1		Policies for information security	Control	Reducing information security risks.
			A set of policies for information security shall be defined, approved by management, published and communicated to employees and relevant external parties.	Defining scope and requirements of the ISMS.
A.5.1.2		Review of the policies for information security	Control  The policies for information security shall be reviewed at planned intervals or if significant changes occur to ensure their continuing suitability, adequacy and effectiveness.	Reducing information security risks. Defining scope and requirements of the ISMS.
A.6 (	Organi	ization of information secur	rity	
		organization		
Objective:	To estab	lish a management framework to initiate	and control the implementation and operation of information security wi	
A.6.1.1		Information security roles and responsibilities	Control All information security responsibilities should be defined and allocated.	Reducing information security risks.
A.6.1.2		Segregation of duties	Control Conflicting duties and areas of responsibility should be segregated to reduce opportunities for unauthorized or unintentional modification or misuse of the organization's assets.	Reducing information security risks.
A.6.1.3		Contact with authorities	Control Appropriate contacts with relevant authorities should be maintained.	Legal and stakeholder requirements.
A.6.1.4		Contact with special interest groups	Control Appropriate contacts with special interest groups or other specialist security forums and professional associations should be maintained.	Active participation in and associate with SIGs for security is not part of our security policy and will not decrease risks for Onetrail. Onetrail subscribes to vulnerability mail lists and follows the Centre of Internet Security to get the latest information security context, risks and mitigations.
A.6.1.5		Information security in project management	Control Information security should be addressed in project management, regardless of the type of the project.	Reducing information security risks.
A.6.2 N	/lohile	devices and teleworking		
-		re the security of teleworking and use of r	nobile devices.	
A.6.2.1		Mobile device policy	Control  A policy and supporting security measures should be adopted to manage the risks introduced by using mobile devices.	Reducing information security risks.
A.6.2.2		Teleworking	Control  A policy and supporting security measures should be implemented to protect information accessed, processed or stored at teleworking sites.	Reducing information security risks.
A.7 Hu	man r	esource security		
		employment		
Objective:	To ensur	re that employees and contractors unders	tand their responsibilities and are suitable for the roles for which they are	considered.
A.7.1.1		Screening	Control  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.	Reducing information security risks.
A.7.1.2		Terms and conditions of employment	Control  The contractual agreements with employees and contractors shall state their and the organization's responsibilities for information security.	Reducing information security risks.
		mployment		1
Objective:	To ensur	re that employees and contractors are aw	are of and fulfil their information security responsibilities.	
A.7.2.1		Management responsibilities	Control  Management shall require all employees and contractors to apply information security in accordance with the established policies and procedures of the organization.	Reducing information security risks, legal, stakeholder and contractual requirements.
A.7.2.2		Information security awareness, education and training	Control  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.	Reducing information security risks.



	nation and change of employm		
	otect the organization's interests as part	of the process of changing or terminating employment.	
A.7.3.1	Termination or change of employment responsibilities	Control 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.	Reducing information security risks.
A.8 Asset r	management	Manager Anna Carlo	
	nsibility for assets		
Objective: To ide	entify organizational assets and define ap	opropriate protection responsibilities.	
A.8.1.1	Inventory of assets	Control  Assets associated with information and information processing facilities shall be identified and an inventory of these assets shall be drawn up and maintained.	Reducing information security risks, legal, stakeholder and contractual requirements.
A.8.1.2	Ownership of assets	Control Assets maintained in the inventory shall be owned.	Reducing information security risks.
A.8.1.3	Acceptable use of assets	Control  Rules for the acceptable use of information and of assets associated with information and information processing facilities shall be identified, documented and implemented.	Reducing information security risks.
A.8.1.4	Ownership of assets	Control  All employees and external party users shall return all of the organizational assets in their possession upon termination of their employment, contract or agreement.	Reducing information security risks, legal, stakeholder and contractual requirements.
	nation classification		
Date of Assessm	nent		
A.8.2.1	Classification of information	Control Information shall be classified in terms of legal requirements, value, criticality and sensitivity to unauthorised disclosure or modification.	Reducing information security risks, legal, stakeholder and contractual requirements.
A.8.2.2	Labelling of information	Control  An appropriate set of procedures for information labelling shall be developed and implemented in accordance with the information classification scheme adopted by the organization.	Reducing information security risks, legal, stakeholder and contractual requirements.
A.8.2.3	Handling of assets	Control  Procedures for handling assets shall be developed and implemented in accordance with the information classification scheme adopted by the organization.	Reducing information security risks.
A.8.3 Media			
Objective: To pr	event unauthorized disclosure, modificati	ion, removal or destruction of information stored on media.	
A.8.3.1	Management of removable media	Control Procedures shall be implemented for the management of removable media in accordance with the classification scheme adopted by the organization.	Reducing information security risks.



A.8.3.2	Disposal of media	Control  Media shall be disposed of securely when no longer required, using formal procedures.	Reducing information security risks.
A.8.3.3	Physical media transfer	Control  Media containing information shall be protected against unauthorized access, misuse or corruption during transportation.	Reducing information security risks.
A.9 Access			
	ess requirements of access contro		
A.9.1.1	nit access to information and information pro Access control policy	Control	Reducing information security risks.
		An access control policy should be established, documented and reviewed based on business and information security requirements.	The second of th
A.9.1.2	Access to networks and network services	Control Users should only be provided with access to the network and network	Reducing information security risks.
A.9.2 User a	access management	services that they have been specifically authorized to use.	
	sure authorized user access and to prevent u	nauthorized access to systems and services.	
A.9.2.1	User registration and deregistration	Control A formal user registration and de- registration process should be implemented to enable assignment of	Reducing information security risks.
A.9.2.2	User access provisioning	Control  A formal user access provisioning process should be implemented to assign or revoke access rights for all user types to all systems and services.	Reducing information security risks.
A.9.2.3	Management of privileged access rights	Control  The allocation and use of privileged access rights should be restricted and controlled.	Reducing information security risks.
A.9.2.4	Management of secret authentication information of users	Control The allocation of secret authentication information should be controlled	Reducing information security risks.
A.9.2.5	Review of user access rights	through a formal management process.  Control  Asset owners should review users' access rights at regular intervals.	Reducing information security risks.
A.9.2.6	Removal or adjustment of access rights	Control  The access rights of all employees and external party users to information and information processing facilities should be removed upon termination of their employment, contract or agreement, or adjusted upon change.	Reducing information security risks.
A.9.3 User re	esponsibilities		
	ake users accountable for safeguarding their	authentication information.	
A.9.3.1	Use of secret authentication information		Reducing information security risks.

	em and application access control		
	revent unauthorized access to systems and a		
A.9.4.1	Information access restriction	Control Access to information and application system functions should be restricted in accordance with the access control policy.	Reducing information security risks
A.9.4.2	Secure log-on procedures	Control  Where required by the access control policy, access to systems and applications should be controlled by a secure log-on procedure.	Reducing information security risk
A.9.4.3	Password management system	Control Password management systems should be interactive and should ensure quality passwords.	Reducing information security risks
A.9.4.4	Use of privileged utility programs	Control The use of utility programs that might be capable of overriding system and application controls should be restricted and tightly controlled.	Reducing information security risks
A.9.4.5	Access control to program source code	Control Access to program source code should be restricted.	Reducing information security risks
A.10 Crypt	tography etographic controls		
		ny to protect the confidentiality, authenticity and/or integrity of informatic	on.
A.10.1.1	Policy on the use of cryptographic controls	Control A policy on the use of cryptographic controls for protection of information shall be developed and implemented.	Reducing information security risks
A.10.1.2	Key management	Control A policy on the use, protection and lifetime of cryptographic keys shall be developed and implemented through their whole lifecycle.	Reducing information security risks
A.11 Physi	ical and environmental securit	dy	
A.11.1 Secu			
Objective: To p		and interference to the organization's information and information proces	ssing facilities.
A.11.1.1	Physical security perimeter	Control  Security perimeters shall be defined and used to protect areas that contain either sensitive or critical information and information processing facilities.	Reducing information security risks
A.11.1.2	Physical entry controls	Control Secure areas shall be protected by appropriate entry controls to ensure that only authorized personnel are allowed access.	Reducing information security risks
A.11.1.3	Securing offices, rooms and facilities	Control  Physical security for offices, rooms and facilities shall be designed and applied.	Reducing information security risks
A.11.1.4	Protecting against external and environmental threats	Control Physical protection against natural disasters, malicious attack or accidents shall be designed and applied.	The risk associated with this control has been set to acceptable. Some measures have been taken to prevent unauthorized entry, but fo other (natural) disasters or adverse situations the Office is not regarde as essential as all employees can work secure remotely.
A.11.1.5	Working in secure areas	Control Procedures for working in secure areas shall be designed and applied.	No risk related requirements have been identified to implement this control.
A.11.1.6	Delivery and loading areas	Control 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.	No risk related requirements have been identified to implement this control.
A.11.2 Equi	pment		
		assets and interruption to the organization's operations.	



A.11.2.1	Equipment siting and protection	Control Equipment should be sited and protected to reduce the risks from environmental threats and hazards, and opportunities for unauthorized access.	Reducing information security risks.
A.11.2.2	Supporting utilities	Control Equipment should be protected from power failures and other disruptions caused by failures in supporting utilities.	Reducing information security risks.
A.11.2.3	Cabling security	Control Power and telecommunications cabling carrying data or supporting information services should be protected from interception, interference or damage.	Reducing information security risks.
A.11.2.4	Equipment maintenance	Control Equipment shall be correctly maintained to ensure its continued availability and integrity.	Reducing information security risks.
A.11.2.5	Removal of assets	Control Equipment, information or software shall not be taken off-site without prior authorization.	Reducing information security risks.
A.11.2.6	Security of equipment and assets off- premises	Control Security shall be applied to off-site assets taking into account the different risks of working outside the organization's premises.	Reducing information security risks.
A.11.2.7	Secure disposal or reuse of equipment	Control  All items of equipment containing storage media shall be verified to ensure that any sensitive data and licensed software has been removed or securely overwritten prior to disposal or re-use.	Reducing information security risks.
A.11.2.8	Unattended user equipment	Control Users shall ensure that unattended equipment has appropriate	Reducing information security risks.
A.11.2.9	Clear desk and clear screen policy	Protection.  Control  A clear desk policy for papers and removable storage media and a clear screen policy for information processing facilities shall be	Reducing information security risks.
A.12 Op	erations security	adopted.	
	rational procedures and responsi	hilities	
	sure correct and secure operations of inform		
A.12.1.1	Documented operating procedures	Control Operating procedures should be documented and made available to all users who need them.	Reducing information security risks
A.12.1.2	Change management	Control  Changes to the organization, business processes, information processing facilities and systems that affect information security should be controlled.	Reducing information security risks
A.12.1.3	Capacity management	Control  The use of resources should be monitored, tuned and projections made of future capacity requirements to ensure the required system performance.	Reducing information security risks
A.12.1.4	Separation of development, testing and operational environments	Control  Development, testing, and operational environments should be separated to reduce the risks of unauthorized access or changes to the operational environment.	Reducing information security risks
the second secon	ection from malware		
	sure that information and information proce	ssing facilities are protected against malware.	
A.12.2.1	Controls against malware	Control  Detection, prevention and recovery controls to protect against malware should be implemented, combined with appropriate user awareness.	Reducing information security risks. Legal and stakeholder requirements.
A.12.3 Back	-up		
Objective: To pro	otect against loss of data.  Information backup	Control	Dadwin late w
A.12.3.1	ппотпастоп васкир	Backup copies of information, software and system images should be taken and tested regularly in accordance with an agreed backup policy.	Reducing information security risks and stakeholder requirements
	ing and monitoring		
unjective. To rei			
A.12.4.1	Event logging	Control Event logs recording user activities, exceptions, faults and information security events should be produced, kept and regularly reviewed.	Reducing information security risks; legal requirements and stakeholder demands
		Event logs recording user activities, exceptions, faults and information	risks; legal requirements and



A.12.4.4	Clock synchronisation	Control	Ta
7.12.4.4	Clock synchronisation	The clocks of all relevant information processing systems within an organization or security domain should be synchronised to a single reference time source.	Reducing information security risks; legal requirements and stakeholder demands
A.12.5 Con	trol of operational software		
	nsure the integrity of operational systems.		
A.12.5.1	Installation of software on operational systems	Control  Procedures should be implemented to control the installation of software on operational systems.	Reducing information security risks
A.12.6 Tech	nnical vulnerability management		
	revent exploitation of technical vulnerabilitie		
A.12.6.1	Management of technical vulnerabilities	Control Information about technical vulnerabilities of information systems being used should be obtained in a timely fashion, the organization's exposure to such vulnerabilities evaluated and appropriate measures taken to address the associated risk.	Reducing information security risks
A.12.6.2	Restrictions on software installation	Control Rules governing the installation of software by users should be established and implemented.	Reducing information security risks
	rmation systems audit considerati	ions	
	inimise the impact of audit activities on oper		
A.12.7.1	Information systems audit controls	Control  Audit requirements and activities involving verification of operational systems should be carefully planned and agreed to minimize disruptions to business processes.	Reducing information security risks
A.13 Co	mmunications security		
	work security management		
	nsure the protection of information in netwo	rks and its supporting information processing facilities.	
A.13.1.1	Network controls	Control  Networks should be managed and controlled to protect information in systems and applications.	Reducing information security risks
A.13.1.2	Security of network services	Control  Security mechanisms, service levels and management requirements of all network services should be identified and included in network services agreements, whether these services are provided in-house or	Reducing information security risks
A.13.1.3	Segregation in networks	Control Groups of information services, users and information systems should be segregated on networks.	Reducing information security risks
	rmation transfer		
Objective: To m	aintain the security of information transferre	ed within an organization and with any external entity.	
A.13.2.1	Information transfer policies and procedures	Control Formal transfer policies, procedures and controls should be in place to protect the transfer of information through the use of all types of communication facilities.	Reducing information security risks
A.13.2.2	Agreements on information transfer	Control Agreements should address the secure transfer of business information between the organization and external parties.	Reducing information security risks. Stakeholder requirements.



A.13.2.3	Electronic messaging	Control	Poducing information
		Information involved in electronic messaging should be appropriately protected.	Reducing information security risks. Stakeholder requirements.
A.13.2.4	Confidentiality or non- disclosure agreements	Control  Requirements for confidentiality or non- disclosure agreements reflecting the organization's needs for the protection of information should be identified, regularly reviewed and documented.	Reducing information security risks. Stakeholder requirements.
A.14 Syst	tem acquisition, development a	and maintenance	
	curity requirements of information		
Objective: To e		part of information systems across the entire lifecycle. This also includes th	ne requirements for information
A.14.1.1	Information security requirements analysis and specification	Control  The information security related requirements should be included in the requirements for new information systems or enhancements to existing information	Reducing information security risks. Stakeholder requirements.
A.14.1.2	Securing application services on public networks	Control Information involved in application services passing over public networks should be protected from fraudulent activity, contract dispute and unauthorized disclosure and modification.	Reducing information security risks. Legal, contractual and stakeholder requirements.
A.14.1.3	Protecting application services transactions	Control Information involved in application service transactions should be protected to prevent incomplete transmission, mis-routing, unauthorized message alteration, unauthorized disclosure, unauthorized message duplication or replay.	Reducing information security risks. Stakeholder requirements.
A.14.2 Sec	curity in development and support		
		nd implemented within the development lifecycle of information systems.	
A.14.2.1	Secure development policy	Control Rules for the development of software and systems should be	Reducing information security risks.
A.14.2.2	System change control procedures	established and applied to developments within the organization.  Control  Changes to systems within the development lifecycle should be controlled by the use of formal change control procedures.	Reducing information security risks.



A.14.2.3	Technical review of applications after operating platform changes	Control When operating platforms are changed, business critical applications should be reviewed and tested to ensure there is no adverse impact on organizational operations or security.	Reducing information security risks.
A.14.2.4	Restrictions on changes to software packages	Control  Modifications to software packages should be discouraged, limited to necessary changes and all changes should be strictly controlled.	Reducing information security risks.
A.14.2.5	Secure system engineering principles	Control Principles for engineering secure systems should be established, documented, maintained and applied to any information system	Reducing information security risks.
A.14.2.6	Secure development environment	implementation efforts.  Control  Organizations should establish and appropriately protect secure development environments for system development and integration efforts that cover the entire system development lifecycle.	Reducing information security risks.
A.14.2.7	Outsourced development	The organization should supervise and monitor the activity of outsourced system development.	Reducing information security risks.
A.14.2.8	System security testing	Control  Testing of security functionality should be carried out during development.	Reducing information security risks.
A.14.2.9	System acceptance testing	Control  Acceptance testing programs and related criteria should be established for new information systems, upgrades and new versions.	Reducing information security risks.
A.14.3 Test			
A.14.3.1	Protection of test data  Protection of test data	Control  Test data should be selected carefully, protected and controlled.	Reducing information security risks.
	lier relationships	onships	

Objective: To ensure protection of the organization's assets that is accessible by suppliers.



A.15.1.1	Information security policy for supplier relationships	Control 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.	Reducing information security risks.
A.15.1.2	Addressing security within supplier agreements	Control  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.	Reducing information security risks.
A.15.1.3	Information and communication technology supply chain	Control Agreements with suppliers shall include requirements to address the information security risks associated with information and communications technology services and product supply chain.	Reducing information security risks.
	plier service delivery management		
		ty and service delivery in line with supplier agreements.	
A.15.2.1	Monitoring and review of supplier services	Control Organizations shall regularly monitor, review and audit supplier service delivery.	Reducing information security risks.
A.15.2.2	Managing changes to supplier services	Control 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.	Reducing information security risks.
	formation security incident ma		
	nagement of information security i		
<i>Objective: To e</i> A.16.1.1	nsure a consistent and effective approach to t Responsibilities and procedures	the management of information security incidents, including communication Control  Management responsibilities and procedures should be established to ensure a quick, effective and orderly response to information security incidents.	on on security events and Reducing information security risks.
A.16.1.2	Reporting information security events	Control Information security events should be reported through appropriate management channels as quickly as possible.	Reducing information security risks.
A.16.1.3	Reporting information security weaknesses	Control Employees and contractors using the organization's information systems and services should be required to note and report any observed or suspected information security weaknesses in systems or services.	Reducing information security risks.
A.16.1.4	Assessment of and decision on information security events	Control Information security events should be assessed and it should be decided if they are to be classified as information security incidents.	Reducing information security risks.
A.16.1.5	Response to information security incidents	Control Information security incidents should be responded to in accordance with the documented procedures.	Reducing information security risks.
A.16.1.6	Learning from information security incidents	Control Knowledge gained from analysing and resolving information security incidents should be used to reduce the likelihood or impact of future incidents.	Reducing information security risks.
A.16.1.7	Collection of evidence	Control The organization should define and apply procedures for the identification, collection, acquisition and preservation of information,	Reducing information security risks.
A.17 Infor	mation security aspects of bus	which can serve as evidence.	
	rmation security continuity	and by management	
		I in the organization's business continuity management systems.	
A.17.1.1	Planning information security continuity	Control  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.	Reducing information security risks. Contractual and stakeholder requirements.
A.17.1.2	Implementing information security continuity	Control  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.	Reducing information security risks. Contractual and stakeholder requirements.
A.17.1.3	Verify, review and evaluate information security continuity	Control  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	Reducing information security risks. Contractual and stakeholder requirements.
A.17.2 Red			
	ensure availability of information processing for		
A.17.2.1	Availability of information processing facilities	Control Information processing facilities shall be implemented with redundancy sufficient to meet availability requirements.	Reducing information security risks. Contractual and stakeholder requirements.
A.18 Com	pliance		
	pliance with legal and contractual	requirements	
		r contractual obligations related to information security and of any securi	ty requirements

A.18.1.1	Identification of applicable legislation and	Control	Paducing information
	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.	Reducing information security risks. Legal, contractual and stakeholder requirements.
A.18.1.2	Intellectual property rights	Control 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.	Reducing information security risks. Legal, contractual and stakeholder requirements.
A.18.1.3	Protection of records	Control Records shall be protected from loss, destruction, falsification, unauthorized access and unauthorized release, in accordance with legislatory, regulatory, contractual and business requirements.	Reducing information security risks. Legal, contractual and stakeholder requirements.
A.18.1.4	Privacy and protection of personally identifiable information	Control  Privacy and protection of personally identifiable information shall be ensured as required in relevant legislation and regulation where applicable.	Reducing information security risks. Legal, contractual and stakeholder requirements.
A.18.1.5	Regulation of cryptographic controls	Control Cryptographic controls shall be used in compliance with all relevant agreements, legislation and regulations.	Reducing information security risks. Legal, contractual and stakeholder requirements.
	mation security reviews		
Objective: To er A.18.2.1		d and operated in accordance with the organizational policies and proced	
A.10.2.1	Independent review of information security	Control 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.	Contractual and stakeholder requirements.
A.18.2.2	Compliance with security policies and standards	Control  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.	Reducing information security risks.
A.18.2.3	Technical compliance review	Control Information systems shall be regularly reviewed for compliance with the organization's information security policies and standards.	Reducing information security risks.
	Signed by: Jeroen Moonen (CEO)	Van	
	Date: 05/04/2020		