



A-LIGN



Cronofy Limited

ISO/IEC 27001:2013
Stage 2 Report

June 18, 2020

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SECTION 1: STAGE 2 AUDIT REPORT

Cronofy Limited
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June 18, 2020

Company Background

Cronofy Limited (“Cronofy” or the “Company”) was founded in 2014 to address the needs of people wanting to schedule time with organizations, teams, and other people. The core service is delivered as a software as a service (SaaS) application programming interface (API) designed to allow a software developer to interact with an end-user’s calendar data and drive scheduling workflows with it. For those who don’t want to code against an API, Cronofy offers embeddable and stand-alone scheduling products, built on top of the core API.

Cronofy’s serves software vendors providing solutions to a wide variety of industries, including human resources, finance, healthcare, labor marketplaces, education and customer relationship management (CRM).

Overview

To demonstrate the Company’s dedication to information security, Cronofy implemented an information security management system (ISMS) to conform to the requirements of ISO/IEC 27001-2013 (ISO 27001). ISO 27001 was developed by the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC) to standardize the process for establishing, implementing, operating, monitoring, reviewing, maintaining an ISMS. A-LIGN Compliance and Security Inc. (A-LIGN) was engaged by Cronofy to perform the initial certification audit to validate conformity and certify the Company’s ISMS against the ISO 27001 standard.

The initial certification audit is conducted in two stages: stage 1 and stage 2. A stage 1 audit is performed to review the documented ISMS information, obtain necessary information regarding the scope of the ISMS, and determine the preparedness for stage 2. The remote stage 1 was performed on April 23, 2020.

The stage 2 audit was conducted to evaluate the implementation, including effectiveness, of the Company’s ISMS. Stage 2 was performed between June 1, 2020 and June 3, 2020.

A-LIGN analyzed all information and audit evidence gathered during stage 1 and stage 2, reviewed the audit findings, and agreed on the audit conclusion.

Audit Findings

No non-conformities were identified during the stage 2 Audit.

Audit Conclusion

A-LIGN considered the audit evidence with respect to the certification requirements, the scope of certification, and changes to the Company and the ISMS to reach its decision. A-LIGN concludes that the ISMS met the requirements of the audit criteria established, and therefore, recommends certification as of the date of this report.

Audit Objectives

The stage 2 audit was conducted to accomplish the following:

- Determine the conformity of the Company’s ISMS, or parts of it, with the audit criteria
- Determine the ability of the Company’s ISMS to meet applicable statutory, regulatory, and contractual requirements
- Determine the effectiveness of the Company’s ISMS to achieve specified objectives
- Identify areas of potential improvement of the Company’s ISMS, as applicable

Audit Criteria

A-LIGN performed the stage 2 audit to determine conformity to the requirements of ISO 27001 and the defined processes and procedures of the Company's ISMS. Statement of applicability version 1.4, dated June 2, 2020, was used as the basis for the audit, which derived controls and control objectives from ISO 27001 Annex A.

Audit Scope

The scope of certification was defined as:

"The purpose of this document is to provide a record of the scope of the Information Security Management System (ISMS). Cronofy is committed to protecting all data, employee and customer. To achieve this goal, the company has implemented an Information Security Management System in accordance with the standard. Cronofy's ISMS protects all information and data assets for the delivery of all Cronofy functions, services and activities. The assets protected are electronic data, software, and physical IT hardware. Supporting technology includes cloud-based servers, which are within the control of Cronofy. The ISMS applies to all functions, services, activities and data information assets of Cronofy."

A-LIGN deemed the scope of certification to be appropriate based on audit evidence obtained.

Audit Method

During the audit, A-LIGN obtained information relevant to the audit objectives, scope, and criteria. Methods to obtain information included, but was not limited to interviews, observation of processes and activities, and reviews of documentation and records. The audit result also relied upon sampling procedures of the available information, which does not provide absolute assurance of the operation of the controls across the population.

A-LIGN applied the audit methods to:

- Examine and verify the structure, policies, processes, procedures, records, and related documents of the client relevant to the ISMS
- Determine that these met all the requirements relevant to the intended scope of certification
- Determine that the processes and procedures were established, implemented, and maintained effectively, to provide a basis for confidence in the Company's ISMS
- Communicate to the client, for its action, any inconsistencies between the Company's policy, objectives, and targets

Audit evidence either examined or observed during the initial certification consisted of, but was not limited to:

| Evidence description | Version / Date |
|--|------------------|
| Scope of ISMS | 4.0 5/27/2020 |
| Information security policy | 6.0 5/29/2020 |
| Information security risk assessment methodology | 7.0 6/1/2020 |
| Information security risk treatment methodology | 7.0 6/1/2020 |
| Statement of applicability | 1.4 6/2/2020 |
| Information security objectives | Various |
| Evidence of competence | 7.0 5/29/2020 |

| Evidence description | Version / Date |
|--|------------------|
| Documented information determined by the organization as being necessary for the effectiveness of the ISMS | Various |
| Operations planning and control | Various |
| Information security risk assessment | 5/28/2020 |
| Information security risk treatment plan | 5/28/2020 |
| Evidence of monitoring and measuring results | 1.0 6/1/2020 |
| Internal audit program | 3.0 5/18/2020 |
| Internal audit report | 6/2/2020 |
| Management reviews | Various |
| Nonconformities and subsequent action(s) taken | Ongoing |
| Correction(s) and corrective action(s) | Various |
| ISMS roles and responsibilities | 4.0 5/20/2020 |
| Asset inventory | Various |
| Acceptable use policy | 4.0 5/29/2020 |
| Operating procedures for IT management | Various |
| Secure system(s) engineering principles | Various |
| Vendor security policy | 2.0 5/18/2020 |
| Incident management procedures | 7.0 5/29/2020 |
| Business continuity procedures | 3.0 5/19/2020 |
| Statutory, regulatory, and contractual requirements | 6.0 5/29/2020 |
| Logs of user activities, exceptions, and security events | Various |

Audit Process

An opening meeting occurred at approximately 1:00 PM GMT on June 1, 2020. In attendance were Karl Bagci (Head of Operations, Cronofy); Garry Shutler (CTO and Co-founder, Cronofy); Aleksandar Ivanov (Lead Auditor, A-LIGN); and Eric Bruning (Auditor, A-LIGN). An opening meeting agenda and audit plan was communicated.

The audit was performed over 3 days, between June 1, 2020 and June 3, 2020, which consisted of 3 remote auditing days. Teleconferencing and screen-sharing technology were utilized during the stage 2 audit. No significant issues were identified that would impact the audit program.

Upon completion of the audit activities a closing meeting occurred at approximately 5:00 PM GMT on June 3, 2020. In attendance were Chris Taylor (Senior Site Reliability Engineer, Cronofy); Karl Bagci (Head of Operations, Cronofy); Garry Shutler (CTO and Co-founder, Cronofy); Aleksandar Ivanov (Lead Auditor, A-LIGN); and Eric Bruning (Lead Auditor, A-LIGN). An agenda was provided as well as version 1 of the stage 2 audit plan. All audit objectives were completed as planned.

Internal Audit

A-LIGN examined the audit program for the objectives, scope, criteria of internal audits. Internal audits were to be performed annually. The most recent internal audit, completed in June 2020 by internal employees hand-picked to ensure objectivity and impartiality, identified 9 nonconformities. Results of this internal audit, including any nonconformities, and corrective actions were reviewed and approved by the ISMS Board in June 2020, and documented in the meeting minutes.

Based on audit evidence gathered, A-LIGN concluded that the internal audit objectives, scope, and criteria were appropriate, and the internal audit could ensure that the ISMS was effectively implemented and managed.

Management Reviews

Management reviews, in the form of meetings of the ISMS Board, were scheduled to occur quarterly. The ISMS Board was composed of:

- CTO
- Head of Operations

A-LIGN examined the management review results and approvals for the risk assessment and risk treatment plan, monitoring and measurement results, internal audit, nonconformities, and corrective actions in the meeting minutes of the ISMS Board.

Based on audit evidence gathered, A-LIGN concluded that management could be relied upon to ensure continued suitability, adequacy, and effectiveness of the ISMS.

Conformity Level

A-LIGN has classified the level of conformity to the requirements in relation to the audit criteria as defined below:

- Conforms - Requirement(s) were fulfilled
- Nonconformity - Requirement(s) were not fulfilled
 - Major - A nonconformity that affects the capability of the ISMS to achieve the intended results
 - Minor - A nonconformity that does not affect the capability of the ISMS to achieve the intended results
- Not Applicable - Requirement was excluded on the Statement of Applicability
- Not Selected - Requirement was excluded based on the audit program

Nonconformity Remediation Status

A remediation status has been assigned for each nonconformity identified based on the criteria defined below:

- Open - Status assigned when neither the correction or corrective action has been reviewed and approved by A-LIGN
- Plan for correction and corrective action accepted - Status assigned when the corresponding correction and corrective action has been reviewed and approved by A-LIGN
- Resolved - Status assigned when the correction and corrective action was reviewed, approved, and verified by A-LIGN

Confidentiality Statement

The information included in this report is to be treated as confidential. The report is intended to be for the use of those parties included in the distribution list below and should not be relied upon by any other parties.

Distribution List

The report has been distributed to the following persons:

- Garry Shutler, CTO and Co-Founder, Cronofy
- Karl Bagci, Head of Operations, Cronofy
- Steve Simmons, EVP Compliance Services, A-LIGN
- Arti Lalwani, ISO Practice Lead, A-LIGN
- Adam Lubbert, Senior Manager, A-LIGN
- Aleksandar Ivanov, Lead Auditor, A-LIGN
- Eric Bruning, Auditor, A-LIGN

SECTION 2: CONFORMANCE TESTING

| ISO 27001:2013 Clauses | | Conformity Level |
|---|--|------------------|
| Clause 4 - Context of the Organization | | |
| 4.1 | Understanding the Organization and its Context | |
| 4.1 | The organization shall determine external and internal issues that are relevant to its purpose and that affect its ability to achieve the intended outcome(s) of its information security management system. | Conforms |
| 4.2 | Understanding the Needs and Expectations of Interested Parties | |
| 4.2.a | The organization shall determine: Interested parties that are relevant to the information security management system; and | Conforms |
| 4.2.b | The organization shall determine: The requirements of these interested parties relevant to information security. | Conforms |
| 4.3 | Determining the scope of the Information Security Management System | |
| The organization shall determine the boundaries and applicability of the information security management system to establish its scope. When determining this scope, the organization shall consider: | | |
| 4.3.a | The external and internal issues referred to in 4.1; | Conforms |
| 4.3.b | The requirements referred to in 4.2; and | Conforms |
| 4.3.c | Interfaces and dependencies between activities performed by the organization, and those that are performed by other organizations. | Conforms |
| 4.4 | Information Security Management System | |
| 4.4 | The organization shall establish, implement, maintain and continually improve an information security management system, in accordance with the requirements of this International Standard. | Conforms |
| Clause 5 - Leadership | | |
| 5.1 | Leadership and Commitment | |
| Top management shall demonstrate leadership and commitment with respect to the information security management system by: | | |
| 5.1.a | Ensuring the information security policy and the information security objectives are established and are compatible with the strategic direction of the organization; | Conforms |
| 5.1.b | Ensuring the integration of the information security management system requirements into the organization's processes; | Conforms |

| ISO 27001:2013 Clauses | | Conformity Level |
|---|---|------------------|
| 5.1.c | Ensuring that the resources needed for the information security management system are available; | Conforms |
| 5.1.d | Communicating the importance of effective information security management and of conforming to the information security management system requirements; | Conforms |
| 5.1.e | Ensuring that the information security management system achieves its intended outcome(s); | Conforms |
| 5.1.f | Directing and supporting persons to contribute to the effectiveness of the information security management system; | Conforms |
| 5.1.g | Promoting continual improvement; and | Conforms |
| 5.1.h | Supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility. | Conforms |
| 5.2 Policy | | |
| Top management shall establish an information security policy that: | | |
| 5.2.a | Is appropriate to the purpose of the organization; | Conforms |
| 5.2.b | Includes information security objectives (see 6.2) or provides the framework for setting information security objectives; | Conforms |
| 5.2.c | Includes a commitment to satisfy applicable requirements related to information security; and | Conforms |
| 5.2.d | Includes a commitment to continual improvement of the information security management system. | Conforms |
| The information security policy shall: | | |
| 5.2.e | Be available as documented information; | Conforms |
| 5.2.f | Be communicated within the organization; and | Conforms |
| 5.2.g | Be available to interested parties, as appropriate. | Conforms |
| 5.3 Organizational Roles, Responsibilities, and Authorities | | |
| Top management shall ensure that the responsibilities and authorities for roles relevant to information security are assigned and communicated. Top management shall assign the responsibility and authority for: | | |
| 5.3.a | Ensuring that the information security management system conforms to the requirements of this International Standard; and | Conforms |

| ISO 27001:2013 Clauses | | Conformity Level |
|----------------------------|---|------------------|
| 5.3.b | Reporting on the performance of the information security management system to top management. | Conforms |
| Clause 6 - Planning | | |
| 6.1 | Actions to Address Risks and Opportunities | |
| 6.1.1 | General | |

When planning for the information security management system, the organization shall consider the issues referred to in 4.1 and the requirements referred to in 4.2 and determine the risks and opportunities that need to be addressed to:

| | | |
|---------|--|----------|
| 6.1.1.a | Ensure the information security management system can achieve its intended outcome(s); | Conforms |
| 6.1.1.b | Prevent, or reduce, undesired effects; and | Conforms |
| 6.1.1.c | Achieve continual improvement. | Conforms |

The organization shall plan:

| | | |
|---------|---|----------|
| 6.1.1.d | Actions to address these risks and opportunities; and | Conforms |
| 6.1.1.e | How to: 1) Integrate and implement the actions into its information security management system processes; and 2) Evaluate the effectiveness of these actions. | Conforms |

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| 6.1.2 Information Security Risk Assessment |
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The organization shall define and apply an information security risk assessment process that:

| | | |
|---------|--|----------|
| 6.1.2.a | Establishes and maintains information security risk criteria that include: 1) The risk acceptance criteria; and 2) Criteria for performing information security risk assessments; | Conforms |
| 6.1.2.b | Ensures that repeated information security risk assessments produce consistent, valid, and comparable results; | Conforms |
| 6.1.2.c | Identifies the information security risks: 1) Apply the information security risk assessment process to identify risks associated with the loss of confidentiality, integrity, and availability for information within the scope of the information security management system; and 2) Identify the risk owners; | Conforms |

| ISO 27001:2013 Clauses | | Conformity Level |
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| 6.1.2.d | Analyzes the information security risks: 1) Assess the potential consequences that would result if the risks identified in 6.1.2 c) 1) were to materialize; 2) Assess the realistic likelihood of the occurrence of the risks identified in 6.1.2 c) 1); and 3) Determine the levels of risk; and | Conforms |
| 6.1.2.e | Evaluates the information security risks: 1) Compare the results of risk analysis with the risk criteria established in 6.1.2 a); and 2) Prioritize the analyzed risks for risk treatment. | Conforms |
| 6.1.3 Information Security Risk Treatment | | |
| The organization shall define and apply an information security risk treatment process to: | | |
| 6.1.3.a | Select appropriate information security risk treatment options, taking account of the risk assessment results; | Conforms |
| 6.1.3.b | Determine all controls that are necessary to implement the information security risk treatment option(s) chosen; (Note: Organizations can design controls as required or identify them from any source) | Conforms |
| 6.1.3.c | Compare the controls determined in 6.1.3.b above with those in Annex A and verify that no necessary controls have been omitted; | Conforms |
| 6.1.3.d | Produce a Statement of Applicability that contains the necessary controls (see 6.1.3 b) and c)) and justification for inclusions, whether they are implemented or not, and the justification for exclusions of controls from Annex A; | Conforms |
| 6.1.3.e | Formulate an information security risk treatment plan; and | Conforms |
| 6.1.3.f | Obtain risk owners' approval of the information security risk treatment plan and acceptance of the residual information security risks. | Conforms |
| 6.2 Information Security Objectives and Planning to Achieve Them | | |
| The organization shall establish information security objectives at relevant functions and levels. The information security objectives shall: | | |
| 6.2.a | Be consistent with the information security policy; | Conforms |
| 6.2.b | Be measurable (if practicable); | Conforms |

| ISO 27001:2013 Clauses | | Conformity Level |
|--|--|------------------|
| 6.2.c | Take into account applicable information security requirements, and results from risk assessment and risk treatment; | Conforms |
| 6.2.d | Be communicated; and | Conforms |
| 6.2.e | Be updated as appropriate. | Conforms |
| The organization shall retain documented information on the information security objectives. When planning how to achieve its information security objectives, the organization shall determine: | | |
| 6.2.f | What will be done; | Conforms |
| 6.2.g | What resources will be required; | Conforms |
| 6.2.h | Who will be responsible; | Conforms |
| 6.2.i | When it will be completed; and | Conforms |
| 6.2.j | How the results will be evaluated. | Conforms |
| Clause 7 - Support | | |
| 7.1 | Resources | |
| 7.1 | The organization shall determine and provide the resources needed for the establishment, implementation, maintenance, and continual improvement of the information security management system. | Conforms |
| 7.2 | Competence | |
| The organization shall: | | |
| 7.2.a | Determine the necessary competence of person(s) doing work under its control that affects its information security performance; | Conforms |
| 7.2.b | Ensure that these persons are competent on the basis of appropriate education, training, or experience; | Conforms |
| 7.2.c | Where applicable, take actions to acquire the necessary competence, and evaluate the effectiveness of the actions taken; and | Conforms |
| 7.2.d | Retain appropriate documented information as evidence of competence. | Conforms |
| 7.3 | Awareness | |
| Persons doing work under the organization's control shall be aware of: | | |
| 7.3.a | The information security policy; | Conforms |
| 7.3.b | Their contribution to the effectiveness of the information security management system, including the benefits of improved information security performance; and | Conforms |

| ISO 27001:2013 Clauses | | Conformity Level |
|--|---|------------------|
| 7.3.c | The implications of not conforming with the information security management system requirements. | Conforms |
| 7.4 | Communication | |
| The organization shall determine the need for internal and external communications relevant to the information security management system including: | | |
| 7.4.a | On what to communicate; | Conforms |
| 7.4.b | When to communicate; | Conforms |
| 7.4.c | With whom to communicate; | Conforms |
| 7.4.d | Who shall communicate; and | Conforms |
| 7.4.e | The processes by which communication shall be effected. | Conforms |
| 7.5 | Documented Information | |
| 7.5.1 | General | |
| The organization's information security management system shall include: | | |
| 7.5.1.a | Documented information required by this International Standard; and | Conforms |
| 7.5.1.b | Documented information determined by the organization as being necessary for the effectiveness of the information security management system. | Conforms |
| 7.5.2 | Creating and Updating | |
| When creating and updating documented information the organization shall ensure appropriate: | | |
| 7.5.2.a | Identification and description (e.g. a title, date, author, or reference number); | Conforms |
| 7.5.2.b | Format (e.g. language, software version, graphics) and media (e.g. paper, electronic); and | Conforms |
| 7.5.2.c | Review and approval for suitability and adequacy. | Conforms |
| 7.5.3 | Control of Documented Information | |
| Documented information required by the information security management system and by this International Standard shall be controlled to ensure: | | |
| 7.5.3.a | It is available and suitable for use, where and when it is needed; and | Conforms |
| 7.5.3.b | It is adequately protected (e.g. from loss of confidentiality, improper use, or loss of integrity). | Conforms |
| For the control of documented information, the organization shall address the following activities, as applicable: | | |
| 7.5.3.c | Distribution, access, retrieval, and use; | Conforms |

| ISO 27001:2013 Clauses | | Conformity Level |
|-----------------------------|---|------------------|
| 7.5.3.d | Storage and preservation, including the preservation of legibility; | Conforms |
| 7.5.3.e | Control of changes (e.g. version control); and | Conforms |
| 7.5.3.f | Retention and disposition. | Conforms |
| Clause 8 - Operation | | |
| 8.1 | Operational Planning and Control | |
| | <p>The organization shall plan, implement, and control the processes needed to meet information security requirements, and to implement the actions determined in 6.1.</p> <p>The organization shall also implement plans to achieve information security objectives determined in 6.2.</p> <p>The organization shall keep documented information to the extent necessary to have confidence that the processes have been carried out as planned.</p> <p>The organization shall control planned changes and review the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary.</p> <p>The organization shall ensure that outsourced processes are determined and controlled.</p> | Conforms |
| 8.2 | Information Security Risk Assessment | |
| | <p>The organization shall perform information security risk assessments at planned intervals or when significant changes are proposed or occur, taking account of the criteria established in 6.1.2 a).</p> <p>The organization shall retain documented information of the results of the information security risk assessments.</p> | Conforms |
| 8.3 | Information Security Risk Treatment | |
| | <p>The organization shall implement the information security risk treatment plan.</p> <p>The organization shall retain documented information of the results of the information security risk treatment.</p> | Conforms |

| ISO 27001:2013 Clauses | | Conformity Level |
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| Clause 9 - Performance Evaluation | | |
| 9.1 | Monitoring, Measurement, Analysis, and Evaluation | |
| The organization shall evaluate the information security performance and the effectiveness of the information security management system. The organization shall determine: | | |
| 9.1.a | What needs to be monitored and measured, including information security processes and controls; | Conforms |
| 9.1.b | The methods for monitoring, measurement, analysis, and evaluation, as applicable, to ensure valid results; | Conforms |
| 9.1.c | When the monitoring and measuring shall be performed; | Conforms |
| 9.1.d | Who shall monitor and measure; | Conforms |
| 9.1.e | When the results from monitoring and measurement shall be analyzed and evaluated; and | Conforms |
| 9.1.f | Who shall analyze and evaluate these results. | Conforms |
| 9.2 | Internal Audit | |
| The organization shall conduct internal audits at planned intervals to provide information on whether the information security management system: | | |
| 9.2.a | Conforms to: 1) The organization's own requirements for its information security management system; and 2) The requirements of this International Standard; and | Conforms |
| 9.2.b | Is effectively implemented and maintained. | Conforms |
| The organization shall: | | |
| 9.2.c | Plan, establish, implement, and maintain an audit program, including the frequency, methods, responsibilities, planning requirements and reporting. The audit program shall take into consideration the importance of the processes concerned and the results of previous audits; | Conforms |
| 9.2.d | Define the audit criteria and scope for each audit; | Conforms |
| 9.2.e | Select auditors and conduct audits that ensure objectivity and the impartiality of the audit process; | Conforms |
| 9.2.f | Ensure that the results of the audits are reported to relevant management; and | Conforms |

| ISO 27001:2013 Clauses | | Conformity Level |
|------------------------|---|------------------|
| 9.2.g | Retain documented information as evidence of the audit program and the audit results. | Conforms |
| 9.3 | Management Review | |

Top management shall review the organization's information security management system at planned intervals to ensure its continuing suitability, adequacy, and effectiveness. The management review shall include consideration of:

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| 9.3.a | The status of actions from previous management reviews; | Conforms |
| 9.3.b | Changes in external and internal issues that are relevant to the information security management system; | Conforms |
| 9.3.c | Feedback on the information security performance, including trends in: <ul style="list-style-type: none"> 1) Non-conformities and corrective actions; 2) Monitoring and measurement results; 3) Audit results; and 4) Fulfilment of information security objectives; | Conforms |
| 9.3.d | Feedback from interested parties; | Conforms |
| 9.3.e | Results of risk assessment and status of risk treatment plan; and | Conforms |
| 9.3.f | Opportunities for continual improvement. | Conforms |

The outputs of the management review shall include decisions related to continual improvement opportunities and any needs for changes to the information security management system.

Clause 10 - Improvement

10.1 Nonconformity and Corrective Action

When a nonconformity occurs, the organization shall:

| | | |
|--------|--|----------|
| 10.1.a | React to the nonconformity, and as applicable: <ul style="list-style-type: none"> 1) Take action to control and correct it; and 2) Deal with the consequences; | Conforms |
| 10.1.b | Evaluate the need for action to eliminate the causes of nonconformity, in order that it does not recur or occur elsewhere, by: <ul style="list-style-type: none"> 1) Reviewing the nonconformity; 2) Determining the causes of the nonconformity; and 3) Determining if similar non-conformities exist, or could potentially occur; | Conforms |
| 10.1.c | Implement any action needed; | Conforms |
| 10.1.d | Review the effectiveness of any corrective action taken; and | Conforms |

| ISO 27001:2013 Clauses | | Conformity Level |
|--|--|------------------|
| 10.1.e | Make changes to the information security management system, if necessary. | Conforms |
| Corrective actions shall be appropriate to the effects of the non-conformities encountered. The organization shall retain documented information as evidence of: | | |
| 10.1.f | The nature of the non-conformities and any subsequent actions taken, and | Conforms |
| 10.1.g | The results of any corrective action. | Conforms |
| 10.2 | Continual Improvement | |
| | The organization shall continually improve the suitability, adequacy, and effectiveness of the information security management system. | Conforms |

| ISO 27001:2013 Annex A | | Conformity Level |
|---|---|------------------|
| A.5 - Information Security Policies | | |
| 5.1 Management director for information security | | |
| 5.1.1 | Policies for information security | Conforms |
| 5.1.2 | Review of the policies for information security | Conforms |
| A.6 - Organization of Information Security | | |
| 6.1 Internal organization | | |
| 6.1.1 | Information security roles and responsibilities | Conforms |
| 6.1.2 | Segregation of duties | Conforms |
| 6.1.3 | Contact with authorities | Conforms |
| 6.1.4 | Contact with special interest groups | Conforms |
| 6.1.5 | Information security in project management | Not applicable |
| 6.2 Mobile devices and teleworking | | |
| 6.2.1 | Mobile device policy | Conforms |
| 6.2.2 | Teleworking | Conforms |
| A.7 - Human Resource Security | | |
| 7.1 Prior to employment | | |
| 7.1.1 | Screening | Conforms |
| 7.1.2 | Terms and conditions of employment | Conforms |
| 7.2 During employment | | |
| 7.2.1 | Management responsibilities | Conforms |
| 7.2.2 | Information security awareness, education, and training | Conforms |
| 7.2.3 | Disciplinary process | Conforms |
| 7.3 Termination and change of employment | | |
| 7.3.1 | Termination or change of employment responsibilities | Conforms |
| A.8 - Asset Management | | |
| 8.1 Responsibility for assets | | |
| 8.1.1 | Inventory of assets | Conforms |
| 8.1.2 | Ownership of assets | Conforms |
| 8.1.3 | Acceptable use of assets | Conforms |
| 8.1.4 | Return of assets | Conforms |

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| 8.2 Information classification | | |
| 8.2.1 | Classification of information | Conforms |
| 8.2.2 | Labeling of information | Conforms |
| 8.2.3 | Handling of assets | Conforms |
| 8.3 Media handling | | |
| 8.3.1 | Management of removable media | Not applicable |
| 8.3.2 | Disposal of media | Conforms |
| 8.3.3 | Physical media transfer | Not applicable |
| A.9 - Access Control | | |
| 9.1 Business requirements of access control | | |
| 9.1.1 | Access control policy | Conforms |
| 9.1.2 | Access to network and network services | Conforms |
| 9.2 User access management | | |
| 9.2.1 | User registration and de-registration | Conforms |
| 9.2.2 | User access provisioning | Conforms |
| 9.2.3 | Management of privileged access rights | Conforms |
| 9.2.4 | Management of secret authentication information of users | Conforms |
| 9.2.5 | Review of user access rights | Conforms |
| 9.2.6 | Removal or adjustment of access rights | Conforms |
| 9.3 User responsibilities | | |
| 9.3.1 | Use of secret authentication information | Conforms |
| 9.4 System and application access control | | |
| 9.4.1 | Information access restriction | Conforms |
| 9.4.2 | Secure log-on procedures | Conforms |
| 9.4.3 | Password management system | Conforms |
| 9.4.4 | Use of privileged utility programs | Conforms |
| 9.4.5 | Access control to program source code | Conforms |
| A.10 - Cryptography | | |
| 10.1 Cryptographic controls | | |
| 10.1.1 | Policy on the use of cryptographic controls | Conforms |
| 10.1.2 | Key management | Conforms |

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| A.11 - Physical and Environmental Security | | |
| 11.1 Secure areas | | |
| 11.1.1 | Physical security perimeter | Not applicable |
| 11.1.2 | Physical entry controls | Not applicable |
| 11.1.3 | Securing offices, rooms, and facilities | Not applicable |
| 11.1.4 | Protecting against external and environmental threats | Not applicable |
| 11.1.5 | Working in secure areas | Not applicable |
| 11.1.6 | Delivery and loading areas | Not applicable |
| 11.2 Equipment | | |
| 11.2.1 | Equipment siting and protection | Not applicable |
| 11.2.2 | Supporting utilities | Not applicable |
| 11.2.3 | Cabling security | Not applicable |
| 11.2.4 | Equipment maintenance | Not applicable |
| 11.2.5 | Removal of assets | Not applicable |
| 11.2.6 | Security of equipment and assets off-premises | Conforms |
| 11.2.7 | Secure disposal or re-use of equipment | Conforms |
| 11.2.8 | Unattended user equipment | Conforms |
| 11.2.9 | Clear desk and clear screen policy | Not applicable |
| A.12 - Operations Security | | |
| 12.1 Operational procedures and responsibilities | | |
| 12.1.1 | Documented operating procedures | Conforms |
| 12.1.2 | Change management | Conforms |
| 12.1.3 | Capacity management | Conforms |
| 12.1.4 | Separation of development, testing and operational environments | Conforms |
| 12.2 Protection from malware | | |
| 12.2.1 | Controls against malware | Conforms |
| 12.3 Backup | | |
| 12.3.1 | Information backup | Conforms |
| 12.4 Logging and monitoring | | |
| 12.4.1 | Event logging | Conforms |
| 12.4.2 | Protection of log information | Conforms |
| 12.4.3 | Administrator and operator logs | Conforms |

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| 12.4.4 | Clock synchronization | Conforms |
| 12.5 Control of operational software | | |
| 12.5.1 | Installation of software on operational systems | Conforms |
| 12.6 Technical vulnerability management | | |
| 12.6.1 | Management of technical vulnerabilities | Conforms |
| 12.6.2 | Restrictions of software installation | Conforms |
| 12.7 Information systems audit considerations | | |
| 12.7.1 | Information systems audit controls | Conforms |
| A.13 - Communications Security | | |
| 13.1 Network security management | | |
| 13.1.1 | Network controls | Conforms |
| 13.1.2 | Security of network services | Conforms |
| 13.1.3 | Segregation in networks | Not applicable |
| 13.2 Information transfer | | |
| 13.2.1 | Information transfer policies and procedures | Conforms |
| 13.2.2 | Agreements on information transfer | Conforms |
| 13.2.3 | Electronic messaging | Conforms |
| 13.2.4 | Confidentiality or non-disclosure agreements | Conforms |
| A.14 - Systems Acquisition, Development, and Maintenance | | |
| 14.1 Security requirements of information systems | | |
| 14.1.1 | Information security requirements analysis and specification | Conforms |
| 14.1.2 | Securing application services on public networks | Conforms |
| 14.1.3 | Protecting application services transactions | Conforms |
| 14.2 Security in development and support processes | | |
| 14.2.1 | Secure development policy | Conforms |
| 14.2.2 | System change control procedures | Conforms |
| 14.2.3 | Technical review of applications after operating platform changes | Conforms |
| 14.2.4 | Restrictions on changes to software packages | Conforms |
| 14.2.5 | Secure system engineering principles | Conforms |
| 14.2.6 | Secure development environment | Conforms |
| 14.2.7 | Outsourced development | Not applicable |
| 14.2.8 | System security testing | Conforms |

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| 14.2.9 | System acceptance testing | Conforms |
| 14.3 Test data | | |
| 14.3.1 | Protection of test data | Not applicable |
| A.15 - Supplier Relationships | | |
| 15.1 Information security in supplier relationships | | |
| 15.1.1 | Information security policy for supplier relationships | Conforms |
| 15.1.2 | Addressing security within supplier agreements | Conforms |
| 15.1.3 | Information and communication technology supply chain | Conforms |
| 15.2 Supplier service delivery management | | |
| 15.2.1 | Monitoring and review of supplier services | Conforms |
| 15.2.2 | Managing changes to supplier services | Conforms |
| A.16 - Information Security Incident Management | | |
| 16.1 Management of information security incidents and improvements | | |
| 16.1.1 | Responsibilities and procedures | Conforms |
| 16.1.2 | Reporting information security events | Conforms |
| 16.1.3 | Reporting information security weaknesses | Conforms |
| 16.1.4 | Assessment of and decision on information security events | Conforms |
| 16.1.5 | Response to information security incidents | Conforms |
| 16.1.6 | Learning from information security incidents | Conforms |
| 16.1.7 | Collection of evidence | Conforms |
| A.17 - Information Security Aspects of Business Continuity Management | | |
| 17.1 Information security continuity | | |
| 17.1.1 | Planning information security continuity | Conforms |
| 17.1.2 | Implementing information security continuity | Conforms |
| 17.1.3 | Verify, review and evaluate information security continuity | Conforms |
| 17.2 Redundancies | | |
| 17.2.1 | Availability of information processing facilities | Conforms |
| A.18 - Compliance | | |
| 18.1 Compliance with legal and contractual requirements | | |
| 18.1.1 | Identification of applicable legislation and contractual requirements | Conforms |
| 18.1.2 | Intellectual property rights | Conforms |

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| 18.1.3 | Protection of records | Conforms |
| 18.1.4 | Privacy and protection of personally identifiable information | Conforms |
| 18.1.5 | Regulation of cryptographic controls | Conforms |
| 18.2 Information security reviews | | |
| 18.2.1 | Independent review of information security | Conforms |
| 18.2.2 | Compliance with security policies and standards | Conforms |
| 18.2.3 | Technical compliance review | Conforms |

SECTION 3: NONCONFORMITY SUMMARY

Nonconformities from the current certification cycle, including the current year, if any, are listed below.

| CONTROL | CONTROL OBJECTIVE | JUSTIFICATION | NOTED | STATUS |
|---------|--|---------------|-------|--------|
| 1. | No nonconformities found during the Stage 2 Audit. | | | |