

STATEMENT OF APPLICABILITY: CIRRUS B.V.

Version: 1.2, current as of 18-05-2022

Classification : Public

Legend (for Selected Controls and Reasons for controls selection)

Source: Cirrus_Security_Framework_And_SOA_2013

LR: legal requirements, CO: contractual obligations, BR/BP: business requirements/adopted best practices, RRA: results of risk assessment, TSE: to some extent

ISO/IEC 27001:2013 Annex A controls			Applicable	Implemented	Reason for exclusion	Selected Controls and Reasons for Selection			
CLAUSE	SEC	CONTROL OBJECTIVE/CONTROL				LR	CO	BR/BP	RRA
A5 SECURITY POLICIES	A.5.1	Management direction for information security							
	A5.1.1	Policies for information	Yes	Yes				✓	✓
	A5.1.2	Review of the policies for information security	Yes	Yes				✓	✓
A6 ORGANISATION OF INFORMATION SECURITY	A6.1	Internal organisation							
	A6.1.1	Information security roles and responsibilities	Yes	Yes				✓	✓
	A6.1.2	Segregation of duties	Yes	Yes				✓	✓
	A6.1.3	Contact with authorities	Yes	Yes				✓	✓
	A6.1.4	Contact with special interest groups	Yes	Yes				✓	✓
	A6.1.5	Information security in project management	Yes	Yes				✓	✓
	A6.2	Mobile devices and teleworking							
	A6.2.1	Mobile device policy	Yes	Yes				✓	✓
A6.2.2	Teleworking	Yes	Yes				✓	✓	
A7 HUMAN RESOURCE SECURITY	A7.1	Prior to employment							
	A7.1.1	Screening	Yes	Yes				✓	✓
	A7.1.2	Terms and conditions of employment	Yes	Yes				✓	✓
	A7.2	During employment							
	A7.2.1	Management responsibilities	Yes	Yes				✓	✓
	A7.2.2	Information security awareness, education and training	Yes	Yes				✓	✓
	A7.2.3	Disciplinary process	Yes	Yes				✓	✓
	A7.3	Termination and change of employment							
A7.3.1	Termination or change of employment responsibilities	Yes	Yes				✓	✓	
A8 ASSET MANAGEMENT	A8.1	Responsibility for assets							
	A8.1.1	Inventory of assets	Yes	Yes				✓	✓
	A8.1.2	Ownership of assets	Yes	Yes				✓	✓
	A8.1.3	Acceptable use of assets	Yes	Yes				✓	✓
	A8.1.4	Return of assets	Yes	Yes				✓	✓
	A8.2	Information classification							
	A8.2.1	Classification of information	Yes	Yes				✓	✓
	A8.2.2	Labeling of information	Yes	Yes				✓	✓
	A8.2.3	Handling of assets	Yes	Yes				✓	✓
	A8.3	Media handling							
	A8.3.1	Management of removable media	Yes	Yes				✓	✓
	A8.3.2	Disposal of media	Yes	Yes				✓	✓
	A8.3.3	Physical media transfer	Yes	Yes				✓	✓
A9 ACCESS CONTROL	A9.1	Business requirements of access control							
	A9.1.1	Access control policy	Yes	Yes				✓	✓
	A9.1.2	Access to networks and network services	Yes	Yes				✓	✓
	A9.2	User access management							
	A9.2.1	User registration and de-registration	Yes	Yes				✓	✓
	A9.2.2	User access provisioning	Yes	Yes				✓	✓
	A9.2.3	Management of privileged access rights	Yes	Yes				✓	✓
	A9.2.4	Management of secret authentication information of users	Yes	Yes				✓	✓
	A9.2.5	Review of user access rights	Yes	Yes				✓	✓
	A9.2.6	Removal or adjustment of access rights	Yes	Yes				✓	✓
	A9.3	User responsibilities							
	A9.3.1	Use of secret authentication information	Yes	Yes				✓	✓
	A9.4	System and application access control							
	A9.4.1	Information access restriction	Yes	Yes				✓	✓
	A9.4.2	Secure log-on procedures	Yes	Yes				✓	✓
	A9.4.3	Password management system	Yes	Yes				✓	✓
	A9.4.4	Use of privileged utility programs	Yes	Yes				✓	✓
A9.4.5	Access control to program source code	Yes	Yes				✓	✓	
A10 CRYPTOGRAPHY	A10.1	Cryptographic controls							
	A10.1.1	Policy on the use of cryptographic controls	Yes	Yes		✓		✓	✓
	A10.1.2	Key management	Yes	Yes				✓	✓
A11 PHYSICAL AND ENVIRONMENTAL SECURITY	A11.1	Secure areas							
	A11.1.1	Physical security perimeter	Yes	Yes					✓
	A11.1.2	Physical entry controls	Yes	Yes					✓
	A11.1.3	Securing office, room and facilities	Yes	Yes					✓
	A11.1.4	Protecting against external end environmental threats	Yes	Yes					✓
	A11.1.5	Working in secure areas	No	N/A	Applies to our hosting partner with servers/backups. Cirrus policies enable secure working in public				
	A11.1.6	Delivery and loading areas	No	N/A	Applies to our hosting partner. Cirrus has no offices with servers/backups, nor unsecure data due to our data handling policy				
	A11.2	Equipment							
A11.2.1	Equipment siting and protection	Yes	Yes					✓	
A11.2.2	Supporting utilities	No	N/A	Cirrus has no infrastructure of its own					
A11.2.3	Cabling security	No	N/A	Cirrus has no infrastructure of its own					

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ISO/IEC 27001:2013 Annex A controls			Applicable	Implemented	Reason for exclusion	Selected Controls and Reasons for Selection				
CLAUSE	SEC	CONTROL OBJECTIVE/CONTROL				LR	CO	BR/BP	RRA	
	A11.2.4	Equipment maintenance	Yes	Yes					✓	
	A11.2.5	Removal of assets	Yes	Yes					✓	
	A11.2.6	Security of equipment and assets off-premises	Yes	Yes					✓	
	A11.2.7	Secure disposal or re-use of equipment	Yes	Yes					✓	
	A11.2.8	Unattended user equipment	Yes	Yes					✓	
	A11.2.9	Clear desk and clear screen policy	Yes	Yes					✓	
	A12 OPERATIONS SECURITY	A12.1	Operational procedures and responsibilities							
		A12.1.1	Documented operating procedures	Yes	Yes					✓
		A12.1.2	Change management	Yes	Yes					✓
A12.1.3		Capacity management	Yes	Yes			✓		✓	
A12.1.4		Separation of development, testing and operational environments	Yes	Yes					✓	
A12.2		Protection from malware								
A12.2.1		Controls against malware	Yes	Yes					✓	
A12.3		Backup								
A12.3.1		Information backup	Yes	Yes			✓		✓	
A12.4		Logging and monitoring								
A12.4.1		Event logging	Yes	Yes					✓	
A12.4.2		Protection of log information	Yes	Yes					✓	
A12.4.3		Administrator and operator logs	Yes	Yes					✓	
A12.4.4		Clock synchronisation	Yes	Yes					✓	
A12.5		Control of operational software								
A12.5.1		Installation of software on operational systems	Yes	Yes					✓	
A12.6		Technical vulnerability management								
A12.6.1		Management of technical vulnerabilities	Yes	Yes					✓	
A12.6.2	Restrictions on software installation	Yes	Yes					✓		
A12.7	Information systems audit considerations									
A12.7.1	Information systems audit controls	Yes	Yes					✓		
A13 COMMUNICATIONS SECURITY	A13.1	Network security management								
	A13.1.1	Network controls	Yes	Yes				✓	✓	
	A13.1.2	Security of network services	Yes	Yes					✓	
	A13.1.3	Segregation in networks	Yes	Yes					✓	
	A13.2	Information transfer								
	A13.2.1	Information transfer policies and procedures	Yes	Yes				✓	✓	
	A13.2.2	Agreements on information transfer	Yes	Yes				✓	✓	
	A13.2.3	Electronic messaging	Yes	Yes					✓	
A13.2.4	Confidentiality or non-disclosure agreements	Yes	Yes					✓		
A14 SYSTEM ACQUISITION, DEVELOPMENT AND MAINTENANCE	A14.1	Security requirements of information systems								
	A14.1.1	Information security requirements analysis and specification	Yes	Yes					✓	
	A14.1.2	Securing applications services on public networks	Yes	Yes					✓	
	A14.1.3	Protecting application services transactions	Yes	Yes					✓	
	A14.2	Security in development and support processes								
	A14.2.1	Secure development policy	Yes	Yes			✓		✓	
	A14.2.2	System change control procedures	Yes	Yes					✓	
	A14.2.3	Technical review of applications after operating platform changes	Yes	Yes					✓	
	A14.2.4	Restrictions on changes to software packages	Yes	Yes					✓	
	A14.2.5	Secure system engineering principles	Yes	Yes			✓		✓	
	A14.2.6	Secure development environment	Yes	Yes					✓	
	A14.2.7	Outsourced development	No	N/A	Cirrus does not outsource. Any development is directly managed by Cirrus.					
	A14.2.8	System security testing	Yes	Yes					✓	
A14.2.9	System acceptance testing	Yes	Yes					✓		
A14.3	Test data									
A14.3.1	Protection of test data	Yes	Yes			✓	✓	✓		
A15 SUPPLIER RELATIONSHIPS	A15.1	Information security in supplier relationships								
	A15.1.1	Information security policy for supplier relationships	Yes	Yes			✓	✓	✓	
	A15.1.1	Addressing security within supplier agreements	Yes	Yes			✓	✓	✓	
	A15.1.2	Information and communication technology supply chain	Yes	Yes					✓	
	A15.2	Supplier service delivery management								
	A15.2.1	Monitoring and review of supplier services	Yes	Yes					✓	
	A15.2.2	Managing changes to supplier services	Yes	Yes					✓	
A16 INFORMATION SECURITY INCIDENT MANAGEMENT	A16.1	Management of information security incidents and improvements								
	A16.1.1	Responsibilities and procedures	Yes	Yes					✓	
	A16.1.2	Reporting information security events	Yes	Yes					✓	
	A16.1.3	Reporting information security weaknesses	Yes	Yes			✓		✓	
	A16.1.4	Assessment of and decision on information security events	Yes	Yes					✓	
	A16.1.5	Response to information security incidents	Yes	Yes			✓	✓	✓	
	A16.1.6	Learning from information security incidents	Yes	Yes					✓	
	A16.1.7	Collection of evidence	Yes	Yes					✓	

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ISO/IEC 27001:2013 Annex A controls			Applicable	Implemented	Reason for exclusion	Selected Controls and Reasons for Selection			
CLAUSE	SEC	CONTROL OBJECTIVE/CONTROL				LR	CO	BR/BP	RRA
A17 INFORMATION SECURITY ASPECTS OF BUSINESS CONTINUITY MANAGEMENT	A17.1	Information security continuity							
	A17.1.1	Planning information security continuity	Yes	Yes		✓	✓	✓	
	A17.1.2	Implementing information security continuity	Yes	Yes			✓	✓	
	A17.1.3	Verify, review and evaluate information security continuity	Yes	Yes			✓	✓	
	A17.2	Redundancies							
	A17.2.1	Availability of information processing facilities	Yes	Yes		✓	✓	✓	
A18 COMPLIANCE	A18.1	Compliance with legal and contractual requirements							
	A18.1.1	Identification of applicable legislation and contractual requirements	Yes	Yes		✓		✓	
	A18.1.2	Intellectual property rights	Yes	Yes		✓		✓	
	A18.1.3	Protection of records	Yes	Yes		✓		✓	
	A18.1.4	Privacy and protection of personally identifiable information	Yes	Yes		✓		✓	
	A18.1.5	Regulation of cryptographic controls	Yes	Yes		✓		✓	
	A18.2	Information security reviews							
	A18.2.1	Independent review of information security	Yes	Yes			✓	✓	
	A18.2.2	Compliance with security policies and standards	Yes	Yes			✓	✓	
	A18.2.3	Technical compliance review	Yes	Yes			✓	✓	