## Statement of applicability NEN-EN-ISO/IEC 27001:2017 en



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

Version: 20221125-1 Date: 25-11-2022

						ection	Implementation	
			RRA	СО	LR	BR/BP	Implementation	
	Information security policies	Control Measure						
l	Management direction for information security							
		A set of policies for information security shall be defined, approved by management, published and communicated to employees and relevant external						
.1	Policies for information security	parties	•	•		•	Implemented	
		The policies for information security shall be reviewed at planned intervals or if significant changes occur to ensure their continuing suitability, adequacy and						
.2	Review of the policies for information security  Organization of information security	effectiveness	•	•			Implemented	
	Internal organization							
.1	Information security roles and responsibilities	All information security responsibilities shall be defined and allocated  Conflicting duties and areas of responsibility shall be segregated to reduce	•	•	•	•	Implemented	
		opportunities for unauthorized or unintentional modification or misuse of the					*t	
.2	Segregation of duties Contact with authorities	organization's assets Appropriate contacts with relevant authorities shall be maintained	•	•	•		Implemented Implemented	
.4	Contact with special interest groups	Appropriate contacts with special interest groups or other specialist security forums and professional associations shall be maintained					Implemented	
		Information security shall be addressed in project management, regardless of the	Ť		Ť	<u> </u>		
.5	Information security in project management  Mobile devices and teleworking	type of the project	•			•	Implemented	
		A policy and supporting security measures shall be adopted to manage the risks		T	Π			
.1	Mobile device policy	introduced by using mobile devices  A policy and supporting security measures shall be implemented to protect	•		•	•	Implemented	
.2	Teleworking	information accessed, processed or stored at teleworking sites					Implemented	
_	Human resource security Prior to employment							
	, , , , , , , , , , , , , , , , , , , ,	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						
.1	Screening	be accessed and the perceived risks  The contractual agreements with employees and contractors shall state their and	•	•	•	•	Implemented	
.2	Terms and conditions of employment	the organization's responsibilities for information security					Implemented	
	During employment	Management shall require all employees and contractors to apply information						
1	Management recognibilities	security in accordance with the established policies and procedures of the		1.			Implemented	
.1	Management responsibilities	organization All employees of the organization and, where relevant, contractors shall receive	<u> </u>	•	+•	<u> </u>	Implemented	
.2	Information security awareness, education and training	appropriate awareness education and training and regular updates in organizational policies and procedures, as relevant for their job function	.				Implemented	
		There shall be a formal and communicated disciplinary process in place to take	<u> </u>	Ť				
.3	Disciplinary process  Termination and change of employment	action against employees who have committed an information security breach	•	_		•	Implemented	
		Information security responsibilities and duties that remain valid after termination						
.1	Termination or change of employment responsibilities	or change of employment shall be defined, communicated to the employee or contractor and enforced					Implemented	
	Asset management Responsibility for assets							
	Responsibility for assets	Assets associated with information and information processing facilities shall be			Г			
.1	Inventory of assets Ownership of assets	identified and an inventory of these assets shall be drawn up and maintained Assets maintained in the inventory shall be owned	•	-		•	Implemented Implemented	
	Ownership or assets	Rules for the acceptable use of information and of assets associated with	Ť			Ť	Implemented	
.3	Acceptable use of assets	information and information processing facilities shall be identified, documented and implemented	١.				Implemented	
		All employees and external party users shall return all of the organizational assets						
.4	Return of assets Information classification	in their possession upon termination of their employment, contract or agreement	•	•		•	Implemented	
		Information shall be classified in terms of legal requirements, value, criticality and					TI	
.1	Classification of Information	sensitivity to unauthorised disclosure or modification  An appropriate set of procedures for information labelling shall be developed and	•	•	•	•	Implemented	
.2	Labelling of information	implemented in accordance with the information classification scheme adopted by the organization	١.				Implemented	
		Procedures for handling assets shall be developed and implemented in accordance	·			Ť		
.3	Handling of assets  Media handling	with the information classification scheme adopted by the organization	•			٠.	Implemented	
		Procedures shall be implemented for the management of removable media in		Τ	Π		*	
.1	Management of removable Media	accordance with the classification scheme adopted by the organization  Media shall be disposed of securely when no longer required, using formal	•		•	•	Implemented	
.2	Disposal of media	procedures			•	•	Implemented	
.3	Physical media transfer	Media containing information shall be protected against unauthorized access, misuse or corruption during transportation					Implemented	
	Access control  Business requirements of access control							
		An access control policy shall be established, documented and reviewed based on		Т	Т			
1	Access control policy	business and information security requirements  Users shall only be provided with access to the network and network services that	•	•	•	•	Implemented	
.2	Access to networks and network services	they have been specifically authorized to use					Implemented	
	User access management	A formal user registration and de-registration process shall be implemented to		1	_	T		
1	User registration and deregistration	enable assignment of access rights			•	•	Implemented	
2	User access provisioning	A formal user access provisioning process shall be implemented to assign or revoke access rights for all user types to all systems and services					Implemented	
3	Management of privileged access rights	The allocation and use of privileged access rights shall be restricted and controlled	•	•	•	•	Implemented	
.4	Management of secret authentication information of users	The allocation of secret authentication information shall be controlled through a formal management process	L.		<b>_</b> •		Implemented	
.5	Review of user access rights	Asset owners shall review users' access rights at regular intervals	•	•	•	•	Implemented	
		The access rights of all employees and external party users to information and information processing facilities shall be removed upon termination of their						
.6	Removal or adjustment of access rights User responsibilities	employment, contract or agreement, or adjusted upon change	•	•	•		Implemented	
	·	Users shall be required to follow the organization's practices in the use of secret						
1	Use of secret authentication information  System and application access control	authentication information	•	_		•	Implemented	
		Access to information and application system functions shall be restricted in						
.1	Information access restriction	accordance with the access control policy  Where required by the access control policy, access to systems and applications	•	•	•	•	Implemented	
.2	Secure log-on procedures	shall be controlled by a secure log-on procedure			•	•	Implemented	
.3	Password management system	Password management systems shall be interactive and shall ensure quality passwords	.				Implemented	
.4		The use of utility programs that might be capable of overriding system and application controls shall be restricted and tightly controlled					Implemented	
.4 .5	Use of privileged utility programs  Access control to program source code	Access to program source code shall be restricted	•	1		_	Implemented	
	Cryptography							
1	Cryptographic controls	A policy on the use of cryptographic controls for protection of information shall be						
1.1	Policy on the use of cryptographic controls	developed and implemented	•	•	•	•	Implemented	
1.2	Key management	A policy on the use, protection and lifetime of cryptographic keys shall be developed and implemented through their whole lifecycle					Implemented	
1	Physical and environmental security							
1	Secure areas	Security perimeters shall be defined and used to protect areas that contain either						
1.1	Physical security perimeter	sensitive or critical information and information processing facilities	•	•	•	•	Implemented	
	Physical entry controls	Secure areas shall be protected by appropriate entry controls to ensure that only authorized personnel are allowed access					Implemented	
	Securing offices, rooms and facilities	Physical security for offices, rooms and facilities shall be designed and applied	•	•	•	•	Implemented	
	Protecting against external and environmental threats	Physical protection against natural disasters, malicious attack or accidents shall be designed and applied					Implemented	
	Working in secure areas	Procedures for working in secure areas shall be designed and applied	•	•		•	Implemented	
		Access points such as delivery and loading areas and other points where unauthorized persons could enter the premises shall be controlled and, if possible,						
	Delivery and loading areas	isolated from information processing facilities to avoid unauthorized access		•		•	Implemented	
1.6 2	Equipment							

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					or se	lection	Implementation	
			RRA	СО	LR	BR/BP	Implementation	
		Control Measure						
11.2.2	Supporting utilities	Equipment shall be protected from power failures and other disruptions caused by failures in supporting utilities					Implemented	
	Cabling security	Power and telecommunications cabling carrying data or supporting information services shall be protected from interception, interference or damage				١.	Implemented	
		Equipment shall be correctly maintained to ensure its continued availability and	•	•	i.	<b>†</b>		
1.2.4	Equipment maintenance	integrity  Equipment, information or software shall not be taken off-site without prior	•	•	•	•	Implemented	
1.2.5	Removal of assets	authorization  Security shall be applied to off-site assets taking into account the different risks of	•		•	•	Implemented	
1.2.6	Security of equipment and assets off-premises	working outside the organization's premises	•				Implemented	
		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						
	Secure disposal or re-use of equipment Unattended user equipment	prior to disposal or re-use Users shall ensure that unattended equipment has appropriate protection	<b>:</b>	•	•	<b>:</b>	Implemented Implemented	
		A clear desk policy for papers and removable storage media and a clear screen policy for information processing facilities shall be adopted					Implemented	
1.2.9 L <b>2</b>	Clear desk and clear screen policy  Operations security	policy for information processing facilities shall be adopted	•	-	•	•	Implemented	
2.1	Operational procedures and responsibilities	Operating procedures shall be documented and made available to all users who				1		
2.1.1	Documented operating procedures	need them		•			Implemented	
2.1.2	Change management	Changes to the organization, business processes, information processing facilities and systems that affect information security shall be controlled					Implemented	
2.1.3	Capacity management	The use of resources shall be monitored, tuned and projections made of future capacity requirements to ensure the required system performance			١.	١.	Implemented	
		Development, testing, and operational environments shall be separated to reduce						
2.1.4	Separation of development, testing and operational environments  Protection from malware	the risks of unauthorized access or changes to the operational environment	•		٠.	•	Implemented	
221	Controls against malware	Detection, prevention and recovery controls to protect against malware shall be implemented, combined with appropriate user awareness				١.	Implemented	
2.3	Backup						Implemented	
2.3.1	Information backup	Backup copies of information, software and system images shall be taken and tested regularly in accordance with an agreed backup policy					Implemented	
2.4	Logging and monitoring							
2.4.1	Event logging	Event logs recording user activities, exceptions, faults and information security events shall be produced, kept and regularly reviewed					Implemented	
2.4.2	Protection of log information	Logging facilities and log information shall be protected against tampering and unauthorized access	L.		⊥.	⊥.	Implemented	
	Administrator and operator logs	System administrator and system operator activities shall be logged and the logs protected and regularly reviewed				١.	Implemented	
		The clocks of all relevant information processing systems within an organization or				1		
2.4.4	Clock synchronisation Control of operational software	security domain shall be synchronised to a single reference time source	•		_	•	Implemented	
2.5.1		Procedures shall be implemented to control the installation of software on operational systems					Implemented	
12.6	Technical vulnerability management		_				Implemented	
		Information about technical vulnerabilities of information systems being used shall be obtained in a timely fashion, the organization's exposure to such vulnerabilities						
12.6.1	Management of technical vulnerabilities	evaluated and appropriate measures taken to address the associated risk		•	•	•	Implemented	
	Restrictions on software installation	Rules governing the installation of software by users shall be established and implemented					Implemented	
2.7	Information systems audit considerations	Audit requirements and activities involving verification of operational systems shall		<del></del>	Г	Т		
	Information systems audit controls	be carefully planned and agreed to minimise disruptions to business processes					Implemented	
.3.1	Communications security  Network security management							
3.1.1	Network controls	Networks shall be managed and controlled to protect information in systems and applications		١.	١.	١.	Implemented	
		Security mechanisms, service levels and management requirements of all network						
3.1.2	Security of network services	services shall be identified and included in network services agreements, whether these services are provided in-house or outsourced		•			Implemented	
3.1.3	Segregation in networks	Groups of information services, users and information systems shall be segregated on networks					Implemented	
3.2	Information transfer							
3.2.1	Information transfer policies and procedures	Formal transfer policies, procedures and controls shall be in place to protect the transfer of information through the use of all types of communication facilities					Implemented	
3.2.2	Agreements on information transfer	Agreements shall address the secure transfer of business information between the organization and external parties					Implemented	
	Electronic messaging	Information involved in electronic messaging shall be appropriately protected	•	•	•	•	Implemented	
		Requirements for confidentiality or non-disclosure agreements reflecting the organization's needs for the protection of information shall be identified, regularly						
13.2.4 14	Confidentiality or nondisclosure agreements  System acquisition, development and maintenance	reviewed and documented	•	•	•		Implemented	
	Security requirements of information systems				_			
		The information security related requirements shall be included in the requirements						
4.1.1	Information security requirements analysis and specification	for new information systems or enhancements to existing information systems  Information involved in application services passing over public networks shall be	•	•		•	Implemented	
412	Securing application services on public networks	protected from fraudulent activity, contract dispute and unauthorized disclosure and modification	١.	١.			Implemented	
4.1.2	Securing application services on public networks	Information involved in application service transactions shall be protected to	·			Ť	Implemented	
4.1.3	Protecting application services transactions	prevent incomplete transmission, misrouting, unauthorized message alteration, unauthorized disclosure, unauthorized message duplication or replay					Implemented	
4.2	Security in development and support processes	Rules for the development of software and systems shall be established and applied		i -				
4.2.1	Secure development policy	to developments within the organization					Implemented	
4.2.2	System change control procedures	Changes to systems within the development lifecycle shall be controlled by the use of formal change control procedures		<u> </u>	L		Implemented	
		When operating platforms are changed, business critical applications shall be reviewed and tested to ensure there is no adverse impact on organizational						
4.2.3	Technical review of applications after operating platform changes	operations or security		•			Implemented	
4.2.4	Restrictions on changes to software packages	Modifications to software packages shall be discouraged, limited to necessary changes and all changes shall be strictly controlled			L		Implemented	
4.2.5	Secure system engineering principles	Principles for engineering secure systems shall be established, documented, maintained and applied to any information system implementation efforts					Implemented	
2.3	учения в учения риторию	Organizations shall establish and appropriately protect secure development				Ť		
4.2.6	Secure development environment	environments for system development and integration efforts that cover the entire system development lifecycle			<u> </u>	.	Implemented	
		The organization shall supervise and monitor the activity of outsourced system development	BIT dev	/elops	softwa	ire in	Not-applicable	
4.2.7	Outsourced development		•	_	•		Implemented	
	Outsourced development System security testing	Testing of security functionality shall be carried out during development		•	+•	+		
4.2.8	System security testing System acceptance testing	Testing of security functionality shall be carried out during development Acceptance testing programs and related criteria shall be established for new information systems, upgrades and new versions			i.		Implemented	
4.2.8 4.2.9 4.3	System security testing System acceptance testing Test data	Acceptance testing programs and related criteria shall be established for new information systems, upgrades and new versions						
4.2.8 4.2.9 4.3 4.3.1	System security testing System acceptance testing Test data Protection of test data Supplier relationships	Acceptance testing programs and related criteria shall be established for new	•		.   .		Implemented Implemented	
4.2.8 4.2.9 4.3 4.3.1	System security testing System acceptance testing Test data Protection of test data	Acceptance testing programs and related criteria shall be established for new information systems, upgrades and new versions  Test data shall be selected carefully, protected and controlled						
4.2.8 4.2.9 4.3 4.3.1 <b>15</b>	System security testing System acceptance testing Test data Protection of test data Supplier relationships Information security in supplier relationships	Acceptance testing programs and related criteria shall be established for new information systems, upgrades and new versions  Test data shall be selected carefully, protected and controlled  Information security requirements for mitigating the risks associated with supplier's access to the organization's assets shall be agreed with the supplier and					Implemented	
14.2.8 14.2.9 14.3 14.3.1 <b>15</b>	System security testing System acceptance testing Test data Protection of test data Supplier relationships	Acceptance testing programs and related criteria shall be established for new information systems, upgrades and new versions  Test data shall be selected carefully, protected and controlled  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  All relevant information security requirements shall be established and agreed with						
14.2.8 14.2.9 14.3 14.3.1 15 15.1	System security testing System acceptance testing Test data Protection of test data Supplier relationships Information security in supplier relationships	Acceptance testing programs and related criteria shall be established for new information systems, upgrades and new versions  Test data shall be selected carefully, protected and controlled  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  All relevant information security requirements shall be established and agreed with each supplier that may access, process, store, communicate, or provide IT					Implemented	
14.2.8 14.2.9 14.3 14.3.1 15 15.1	System security testing  System acceptance testing Test data Protection of test data  Supplier relationships Information security in supplier relationships  Information security policy for supplier relationships	Acceptance testing programs and related criteria shall be established for new information systems, upgrades and new versions  Test data shall be selected carefully, protected and controlled  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  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  All relevant information security requirements shall be established and agreed with	•				Implemented  Implemented	
14.2.8 14.2.9 14.3 14.3.1 15.1 15.1.1 15.1.2	System security testing  System acceptance testing Test data Protection of test data  Supplier relationships Information security in supplier relationships  Information security policy for supplier relationships  Addressing security within supplier agreements  Information and communication technology supply chain	Acceptance testing programs and related criteria shall be established for new information systems, upgrades and new versions  Test data shall be selected carefully, protected and controlled  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  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	•				Implemented  Implemented	
4.2.8 4.2.9 4.3 4.3.1 <b>15</b> .5.1.1 .5.1.1	System security testing  System acceptance testing Test data Protection of test data  Supplier relationships 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	Acceptance testing programs and related criteria shall be established for new information systems, upgrades and new versions  Test data shall be selected carefully, protected and controlled  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  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  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					Implemented  Implemented  Implemented  Implemented	
4.2.8 4.2.9 4.3 4.3.1 <b>15</b> .5.1.1 .5.1.1	System security testing  System acceptance testing Test data Protection of test data  Supplier relationships Information security in supplier relationships  Information security policy for supplier relationships  Addressing security within supplier agreements  Information and communication technology supply chain	Acceptance testing programs and related criteria shall be established for new information systems, upgrades and new versions  Test data shall be selected carefully, protected and controlled  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  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  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  Organizations shall regularly monitor, review and audit supplier service delivery Changes to the provision of services by suppliers, including maintaining and	•				Implemented  Implemented  Implemented	
4.2.8 4.2.9 4.3 4.3.1 15 .5.1 .5.1.1 .5.1.2 .5.1.3 .5.2 .5.2.1	System security testing  System acceptance testing Test data Protection of test data  Supplier relationships 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	Acceptance testing programs and related criteria shall be established for new information systems, upgrades and new versions  Test data shall be selected carefully, protected and controlled  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  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  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  Organizations shall regularly monitor, review and audit supplier service delivery					Implemented  Implemented  Implemented  Implemented	

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						23-11-2022	
			Reasons for selection			ection	Turniamantation
			RRA	СО	LR	BR/BP	Implementation
#		Control Measure					
#		Management responsibilities and procedures shall be established to ensure a quick,					
A.16.1.1	Responsibilities and procedures	effective and orderly response to information security incidents					Implemented
A.16.1.2	Reporting information security events	Information security events shall be reported through appropriate management channels as quickly as possible	•				Implemented
		Employees and contractors using the organization's information systems and					
A.16.1.3	Reporting information security weaknesses	services shall be required to note and report any observed or suspected information security weaknesses in systems or services					Implemented
A.16.1.4	Assessment of and decision on information security events	Information security events shall be assessed and it shall be decided if they are to be classified as information security incidents					Implemented
A 16 1 5	Response to information security incidents	Information security incidents shall be responded to in accordance with the documented procedures					Implemented
		Knowledge gained from analysing and resolving information security incidents shall					
A.16.1.6	Learning from information security incidents	be used to reduce the likelihood or impact of future incidents  The organization shall define and apply procedures for the identification, collection,	•	•	•	•	Implemented
	Collection of evidence	acquisition and preservation of information, which can serve as evidence	•				Implemented
	Information security aspects of business continuity management						
A.17.1	Information security continuity			_	_		
A.17.1.1	Planning information security continuity	The organization shall determine its requirements for information security and the continuity of information security management in adverse situations, e.g. during a crisis or disaster					Implemented
		The organization shall establish, document, implement and maintain processes,					<u> </u>
A 17 1 2	Implementing information security continuity	procedures and controls to ensure the required level of continuity for information security during an adverse situation					Implemented
A.17.1.2	Implementing information security continuity	The organization shall verify the established and implemented information security	•	•	•	•	Implemented
A 17 1 2	Verify, review and evaluate information security continuity	continuity controls at regular intervals in order to ensure that they are valid and effective during adverse situations	_				Implemented
	Redundancies	effective during adverse situations	•	•	•	•	Implemented
A.17.2	recumumees	Information processing facilities shall be implemented with redundancy sufficient to					
A.17.2.1	Availability of information processing facilities	meet availability requirements	•	•	•		Implemented
	Compliance						
A.18.1	Compliance with legal and contractual requirements						
	Identification of applicable legislation and contractual requirements	All relevant legislative statutory, regulatory, contractual requirements and the organization's approach to meet these requirements shall be explicitly identified, documented and kept up to date for each information system and the organization					Implemented
A.10.1.1	Identification of applicable legislation and contractual requirements	Appropriate procedures shall be implemented to ensure compliance with legislative,		•	·	•	Implemented
A.18.1.2	Intellectual property rights	regulatory and contractual requirements related to intellectual property rights and luse of proprietary software products					Implemented
		Records shall be protected from loss, destruction, falsification, unauthorized access and unauthorized release, in accordance with legislatory, regulatory, contractual					
A.18.1.3	Protection of records	and business requirements	•	•	•	•	Implemented
A.18.1.4	Privacy and protection of personally identifiable information	Privacy and protection of personally identifiable information shall be ensured as required in relevant legislation and regulation where applicable	•				Implemented
A.18.1.5	Regulation of cryptographic controls	Cryptographic controls shall be used in compliance with all relevant agreements, legislation and regulations					Implemented
A.18.2	Information security reviews						<u> </u>
		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					
A.18.2.1	Independent review of information security	when significant changes occur	•	•	•	•	Implemented
		Managers shall regularly review the compliance of information processing and procedures within their area of responsibility with the appropriate security policies,					
A.18.2.2	Compliance with security policies and standards	standards and any other security requirements  Information systems shall be regularly reviewed for compliance with the	•	•	•	•	Implemented
A.18.2.3	Technical compliance review	organization's information security policies and standards	•				Implemented

Signed by Alex BIT, CTO BIT:

Ede, 01-12-2022 Version: 20221125-1

- The scope for ISO 27001 and NEN 7510 is:
  Information security related to:
   datacenter services at two locations in BIT's own datacenters
   ISP services: domain name registration, network infrastructure, internet access, webhosting, email, VoIP, managed hosting and cloud services
   customer specific advice and system administration related to previously mentioned ISP services
   hardware and software sales