

Security Classification: System High

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ISO/IEC 27001:2013 Statement of Applicability			Control applicable?	Control implemented?	Reason for Selection (or justification if not applicable) including risk reference	Reference to Control Document/Evidence	Additional Controls Required (if any)
Area	Section	Control	Control Description				
A.5 Information security policies							
	A.5.1 Management direction for information security	A.5.1.1 Policies for information security	A set of policies for information security shall be defined, approved by management, published and communicated to employees and relevant external parties.	1	1	Risk Assessment	POL-ISP-004 Organizational Security Metadata Policies-SOPs Table of Contents as of 30Jun2016
		A.5.1.2 Review of the policies for information security	The policies for information security shall be reviewed at planned intervals or if significant changes occur to ensure their continuing suitability, adequacy and effectiveness.	1	1	Risk Assessment	SOP-QA-001 Quality System Document Management
Totals:				2	2		
A.6 Organization of information							
	A.6.1 Internal organization	A.6.1.1 Information security roles and responsibilities	All information security responsibilities shall be defined and allocated.	1	1	Risk Assessment	POL-ISP-004 Organizational Security Job Descriptions
		A.6.1.2 Segregation of duties	Conflicting duties and areas of responsibility shall be segregated to reduce opportunities for unauthorized or unintentional modification or misuse of the organization's assets.	1	1	Risk Assessment	POL-ISP-008 Network and Computer Operations Security Policy
		A.6.1.3 Contact with authorities	Appropriate contacts with relevant authorities shall be maintained.	1	1	Risk Assessment & Legal Requirement	POL-CORP-006 Corporate Incident Management Policy Communications Protocol
		A.6.1.4 Contact with special interest groups	Appropriate contacts with special interest groups or other specialist security forums and professional associations shall be maintained.	1	1	Risk Assessment	POL-CORP-006 Corporate Incident Management Policy Communications Protocol
		A.6.1.5 Information security in project management	Information security shall be addressed in project management, regardless of the type of the project.	1	1	Risk Assessment	POL-ISP-010 Systems Development and Maintenance Security SOP-SDLC-007 Qualifying or Using Third-party Software Inspection Report Houston Data Center 10/26/2015
	A.6.2 Mobile devices and teleworking	A.6.2.1 Mobile device policy	A policy and supporting security measures shall be adopted to manage the risks introduced by using mobile devices.	1	1	Risk Assessment	POL-ISP-014 Mobile Device Security Policy
		A.6.2.2 Teleworking	A policy and supporting security measures shall be implemented to protect information accessed, processed or stored at teleworking sites.	1	1	Risk Assessment	POL-ISP-009 Access Control Security Policy
Totals:				7	7		
A.7 Human resources security							
	A.7.1 Prior to employment	A.7.1.1 Screening	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.	1	1	Risk Assessment & Legal Requirement	Background check reports maintained by HR
		A.7.1.2 Terms and conditions of employment	The contractual agreements with employees and contractors shall state their and the organization's responsibilities for information security.	1	1	Risk Assessment	Employee Contract
	A.7.2 During employment	A.7.2.1 Management responsibilities	Management shall require all employees and contractors to apply information security in accordance with the established policies and procedures of the organization.	1	1	Risk Assessment	POL-ISP-004 Organizational Security
		A.7.2.2 Information security awareness, education and training	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.	1	1	Risk Assessment	POL-ISP-001 Information Security and Data Privacy

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		A.7.2.3 Disciplinary process	There shall be a formal and communicated disciplinary process in place to take action against employees who have committed an information security breach.	1	1	Risk Assessment	Employee Handbook	
	A.7.3 Termination and change of employment	A.7.3.1 Termination or change of employment responsibilities	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.	1	1	Risk Assessment	Employee Handbook 01-02.6 Security Guidelines (Intellemage)	
		Totals:		6	6			
A.8 Asset management								
	A.8.1 Responsibility for assets	A.8.1.1 Inventory of assets	Assets associated with information and information processing facilities shall be identified and an inventory of these assets shall be drawn up and maintained.	1	1	Risk Assessment	POL-ISP-006 Asset Classification and Control Policy	
		A.8.1.2 Ownership of assets	Assets maintained in the inventory shall be owned.	1	1	Risk Assessment	POL-ISP-006 Asset Classification and Control Policy	
		A.8.1.3 Acceptable use of assets	Rules for the acceptable use of information and of assets associated with information and information processing facilities shall be identified, documented and implemented.	1	1	Risk Assessment	POL-ISP-006 Asset Classification and Control Policy	
		A.8.1.4 Return of assets	All employees and external party users shall return all of the organizational assets in their possession upon termination of their employment, contract or agreement.	1	1	Risk Assessment	POL-ISP-006 Asset Classification and Control Policy 01-02.6 Security Guidelines (Intellemage)	
	A.8.2 Information classification	A.8.2.1 Classification of information	Information shall be classified in terms of legal requirements, value, criticality and sensitivity to unauthorized disclosure or modification.	1	1	Risk Assessment	POL-ISP-006 Asset Classification and Control Policy	
		A.8.2.2 Labeling of information	An appropriate set of procedures for information labeling shall be developed and implemented in accordance with the information classification scheme adopted by the organization.	1	1	Risk Assessment	POL-ISP-006 Asset Classification and Control Policy	
		A.8.2.3 Handling of assets	Procedures for handling assets shall be developed and implemented in accordance with the information classification scheme adopted by the organization.	1	1	Risk Assessment	POL-ISP-006 Asset Classification and Control Policy POL-ISP-008 Network and Computer Operations Security	
	A.8.3 Media Handling	A.8.3.1 Management of removable media	Procedures shall be implemented for the management of removable media in accordance with the classification scheme adopted by the organization.	1	1	Risk Assessment	POL-ISP-006 Asset Classification and Control Policy POL-ISP-008 Network and Computer Operations Security	
		A.8.3.2 Disposal of media	Media shall be disposed of securely when no longer required, using formal procedures.	1	1	Risk Assessment	POL-ISP-006 Asset Classification and Control Policy	
		A.8.3.3 Physical media transfer	Media containing information shall be protected against unauthorized access, misuse or corruption during transportation.	1	1	Risk Assessment	POL-ISP-006 Asset Classification and Control Policy	
		Totals:		10	10			
A.9 Access control								
	A.9.1 Business requirements of access control	A.9.1.1 Access control policy	An access control policy shall be established, documented and reviewed based on business and information security requirements.	1	1	Risk Assessment	POL-ISP-009 Access Control Security Policy POL-ISP-008 Network and Computer Operations Security	
		A.9.1.2 Access to networks and network services	Users shall only be provided with access to the network and network services that they have been specifically authorized to use.	1	1	Risk Assessment	POL-ISP-009 Access Control Security Policy POL-ISP-008 Network and Computer Operations Security	
	A.9.2 User access management	A.9.2.1 User registration and de-registration	A formal user registration and de-registration process shall be implemented to enable assignment of access rights.	1	1	Risk Assessment	SOP-HR-005 HR Operations 01-02.6 Security Guidelines (Intellemage)	

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		A.9.2.2 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.	1	1	Risk Assessment	SOP-HR-005 HR Operations 01-02.6 Security Guidelines (Intellemage)	
		A.9.2.3 Management of privileged access rights	The allocation and use of privileged access rights shall be restricted and controlled.	1	1	Risk Assessment	POL-ISP-009 Access Control Security Policy	
		A.9.2.4 Management of secret authentication information of users	The allocation of secret authentication information shall be controlled through a formal management process.	1	1	Risk Assessment	POL-ISP-009 Access Control Security Policy	
		A.9.2.5 Review of user access rights	Asset owners shall review users' access rights at regular intervals.	1	1	Risk Assessment	POL-ISP-004 Organizational Security	
		A.9.2.6 Removal or adjustment of access rights	The access rights of all employees and external party users to information and information processing facilities shall be removed upon termination of their employment, contract or agreement, or adjusted upon change.	1	1	Risk Assessment	POL-ISP-007-01 Information Security and Privacy Policy Regarding Staff Members	
	A.9.3 User responsibilities	A.9.3.1 Use of secret authentication information	Users shall be required to follow the organization's practices in the use of secret authentication information.	1	1	Risk Assessment	POL-ISP-009 Access Control Security Policy	
	A.9.4 System and application access control	A.9.4.1 Information access restriction	Access to information and application system functions shall be restricted in accordance with the access control policy.	1	1	Risk Assessment	POL-ISP-009 Access Control Security Policy	
		A.9.4.2 Secure log-on procedures	Where required by the access control policy, access to systems and applications shall be controlled by a secure log-on procedure.	1	1	Risk Assessment	POL-ISP-009 Access Control Security Policy	
		A.9.4.3 Password management system	Password management systems shall be interactive and shall ensure quality passwords.	1	1	Risk Assessment	POL-ISP-009 Access Control Security Policy	
		A.9.4.4 Use of privileged utility programs	The use of utility programs that might be capable of overriding system and application controls shall be restricted and tightly controlled.	1	1	Risk Assessment	POL-ISP-009 Access Control Security Policy	
		A.9.4.5 Access control to program source code	Access to program source code shall be restricted.	1	1	Risk Assessment	POL-ISP-009 Access Control Security Policy GitHub is used to protect code. Code is also in escrow at Iron Mountain	
		Totals:		14	14			
A.10 Cryptography								
	A.10.1 Cryptographic controls	A.10.1.1 Policy on the use of cryptographic controls	A policy on the use of cryptographic controls for protection of information shall be developed and implemented.	1	1	Risk Assessment	POL-ISP-010 Systems Development and Maintenance Security	
		A.10.1.2 Key management	A policy on the use, protection and lifetime of cryptographic keys shall be developed and implemented through their whole lifecycle.	1	1	Risk Assessment	POL-ISP-010 Systems Development and Maintenance Security	
		Totals:		2	2			
A.11 Physical and environmental								
	A.11.1 Secure areas	A.11.1.1 Physical security perimeter	Security perimeters shall be defined and used to protect areas that contain either sensitive or critical information and information processing facilities.	1	1	Risk Assessment	POL-ISP-005 Physical and Environmental Security Policy 01-02.6 Security Guidelines (Intellemage)	
		A.11.1.2 Physical entry controls	Secure areas shall be protected by appropriate entry controls to ensure that only authorized personnel are allowed access.	1	1	Risk Assessment	POL-ISP-005 Physical and Environmental Security Policy 01-02.6 Security Guidelines (Intellemage)	
		A.11.1.3 Securing offices, rooms and facilities	Physical security for offices, rooms and facilities shall be designed and applied.	1	1	Risk Assessment	POL-ISP-005 Physical and Environmental Security Policy 01-02.6 Security Guidelines (Intellemage)	
		A.11.1.4 Protecting against external and environmental threats	Physical protection against natural disasters, malicious attack or accidents shall be designed and applied.	1	1	Risk Assessment	POL-ISP-005 Physical and Environmental Security Policy 01-02.6 Security Guidelines (Intellemage)	

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		A.11.1.5 Working in secure areas	Procedures for working in secure areas shall be designed and applied.	1	1	Risk Assessment	POL-ISP-005 Physical and Environmental Security Policy 01-02.6 Security Guidelines (Intellegance)
		A.11.1.6 Delivery and loading areas	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.	1	1	Risk Assessment	POL-ISP-005 Physical and Environmental Security Policy
	A.11.2 Equipment	A.11.2.1 Equipment siting and protection	Equipment shall be sited and protected to reduce the risks from environmental threats and hazards, and opportunities for unauthorized access.	1	1	Risk Assessment	POL-ISP-005 Physical and Environmental Security Policy
		A.11.2.2 Supporting utilities	Equipment shall be protected from power failures and other disruptions caused by failures in supporting utilities.	1	1	Risk Assessment	POL-ISP-005 Physical and Environmental Security Policy
		A.11.2.3 Cabling security	Power and telecommunications cabling carrying data or supporting information services shall be protected from interception, interference or damage.	1	1	Risk Assessment	POL-ISP-005 Physical and Environmental Security Policy
		A.11.2.4 Equipment maintenance	Equipment shall be correctly maintained to ensure its continued availability and integrity.	1	1	Risk Assessment	POL-ISP-005 Physical and Environmental Security Policy
		A.11.2.5 Removal of assets	Equipment, information or software shall not be taken off-site without prior authorization.	1	1	Risk Assessment	SOP-CORP-010 Operations Change Management
		A.11.2.6 Security of equipment and assets off-premises	Security shall be applied to off-site assets taking into account the different risks of working outside the organization's premises.	1	1	Risk Assessment	N/A No off-site assets
		A.11.2.7 Secure disposal or reuse of equipment	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.	1	1	Risk Assessment	OTHER-ITH-040 Data Management Plan HDC POL-ISP-008 Physical and Environmental Security Policy
		A.11.2.8 Unattended user equipment	Users shall ensure that unattended equipment has appropriate protection.	1	1	Risk Assessment	POL-ISP-005 Physical and Environmental Security Policy POL-ISP-009 Access Control Security Policy
		A.11.2.9 Clear desk and clear screen policy	A clear desk policy for papers and removable storage media and a clear screen policy for information processing facilities shall be adopted.	1	1	Risk Assessment	POL-ISP-005 Physical and Environmental Security Policy POL-ISP-009 Access Control Security Policy
Totals:				15	15		
A.12 Operations security							
	A.12.1 Operational procedures and responsibilities	A.12.1.1 Documented operating procedures	Operating procedures shall be documented and made available to all users who need them.	1	1	Risk Assessment	Medidata Policies-SOPs Table Of Contents as of 30Jun2016
		A.12.1.2 Change management	Changes to the organization, business processes, information processing facilities and systems that affect information security shall be controlled.	1	1	Risk Assessment	SOP-CORP-010 Operations Change Management
		A.12.1.3 Capacity management	The use of resources shall be monitored, tuned and projections made of future capacity requirements to ensure the required system performance.	1	1	Risk Assessment	SOP-IT-043-00 Capacity Management Performance Metrics via SLA Portal
		A.12.1.4 Separation of development, testing and operational environments	Development, testing, and operational environments shall be separated to reduce the risks of unauthorized access or changes to the operational environment.	1	1	Risk Assessment	POL-ISP-008 Network and Computer Operations Security Policy
	A.12.2 Protection from malware	A.12.2.1 Controls against malware	Detection, prevention and recovery controls to protect against malware shall be implemented, combined with appropriate user awareness.	1	1	Risk Assessment	POL-ISP-008 Network and Computer Operations Security Policy
	A.12.3 Backup	A.12.3.1 Information backup	Backup copies of information, software and system images shall be taken and tested regularly in accordance with an agreed backup policy.	1	1	Risk Assessment	OTHER-ITH-040 Data Management Plan HDC WI-IT-034-00 Corporate IT Backup System Monitoring ITM P5.2 Data Backup Policy (Intellegance)

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	A.12.4 Logging and monitoring	A.12.4.1 Event logging	Event logs recording user activities, exceptions, faults and information security events shall be produced, kept and regularly reviewed.	1	1	Risk Assessment	SOP-IT-038-04 Event Management SumoLogic
		A.12.4.2 Protection of log information	Logging facilities and log information shall be protected against tampering and unauthorized access.	1	1	Risk Assessment	SOP-IT-038-04 Event Management SumoLogic
		A.12.4.3 Administrator and operator logs	System administrator and system operator activities shall be logged and the logs protected and regularly reviewed.	1	1	Risk Assessment	SOP-IT-038-04 Event Management SumoLogic
		A.12.4.4 Clock synchronization	The clocks of all relevant information processing systems within an organization or security domain shall be synchronized to a single reference time source.	1	1	Risk Assessment	OTHER-ITH-040 Data Management Plan HDC
	A.12.5 Control of operational software	A.12.5.1 Installation of software on operational systems	Procedures shall be implemented to control the installation of software on operational systems.	1	1	Risk Assessment	SOP-CORP-010 Operations Change Management
	A.12.6 Technical vulnerability management	A.12.6.1 Management of technical vulnerabilities	Information about technical vulnerabilities of information systems being used shall be obtained in a timely fashion, the organization's exposure to such vulnerabilities evaluated and appropriate measures taken to address the associated risk.	1	1	Risk Assessment	SOP-ISP-004 Penetration Testing Procedure
		A.12.6.2 Restrictions on software installation	Rules governing the installation of software by users shall be established and implemented.	1	1	Risk Assessment	SOP-CORP-010 Operations Change Management
	A.12.7 Information systems audit considerations	A.12.7.1 Information systems audit controls	Audit requirements and activities involving verification of operational systems shall be carefully planned and agreed to minimize disruptions to business processes.	1	1	Risk Assessment	SOP-CORP-010 Operations Change Management Smartronix Monthly Reports
		Totals:		14	14		
A.13 Communications security							
	A.13.1 Network security management	A.13.1.1 Network controls	Networks shall be managed and controlled to protect information in systems and applications.	1	1	Risk Assessment	POL-ISP-008 Network and Computer Operations Security Policy Network Architecture Design Diagram VLAN/VPN/SIEM/MSSP
		A.13.1.2 Security of network services	Security mechanisms, service levels and management requirements of all network services shall be identified and included in network services agreements, whether these services are provided in-house or outsourced.	1	1	Risk Assessment	POL-ISP-008 Network and Computer Operations Security Policy SOP-ISP-004 Penetration Testing Procedure VLAN/VPN/SIEM/MSSP
		A.13.1.3 Segregation in networks	Groups of information services, users and information systems shall be segregated on networks.	1	1	Risk Assessment	POL-ISP-008 Network and Computer Operations Security Policy Network Architecture Design Diagram VLAN/VPN/SIEM/MSSP
	A.13.2 Information transfer	A.13.2.1 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.	1	1	Risk Assessment	POL-ISP-001 Information Security and Data Privacy POL-ISP-008 Network and Computer Operations Security Policy POL-ISP-013 Compliance Security
		A.13.2.2 Agreements on information transfer	Agreements shall address the secure transfer of business information between the organization and external parties.	1	1	Risk Assessment	Client Master Service Agreement (MSA)
		A.13.2.3 Electronic messaging	Information involved in electronic messaging shall be appropriately protected.	1	1	Risk Assessment	POL-ISP-008 Network and Computer Operations Security Policy
		A.13.2.4 Confidentiality or nondisclosure agreements	Requirements for confidentiality or non-disclosure agreements reflecting the organization's needs for the protection of information shall be identified, regularly reviewed and documented.	1	1	Risk Assessment	POL-ISP-004 Organizational Security
		Totals:		7	7		
A.14 System acquisition,							

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	A.14.1 Security requirements of information systems	A.14.1.1 Information security requirements analysis and specification	The information security related requirements shall be included in the requirements for new information systems or enhancements to existing information systems.	1	1	Risk Assessment	POL-ISP-010 Systems Development and Maintenance Security SOP-SDLC-007 Qualifying or Using Third-party Software
		A.14.1.2 Securing application services on public networks	Information involved in application services passing over public networks shall be protected from fraudulent activity, contract dispute and unauthorized disclosure and modification.	1	1	Risk Assessment	SOP-CORP-010 Operations Change Management
		A.14.1.3 Protecting application services transactions	Information involved in application service transactions shall be protected to prevent incomplete transmission, mis-routing, unauthorized message alteration, unauthorized disclosure, unauthorized message duplication or replay	1	1	Risk Assessment	N/A No application service transactions in MCC
	A.14.2 Security in development and support processes	A.14.2.1 Secure development policy	Rules for the development of software and systems shall be established and applied to developments within the organization.	1	1	Risk Assessment	POL-ISP-010 Systems Development and Maintenance Security SOP-SDLC-007 Qualifying or Using Third-party Software
		A.14.2.2 System change control procedures	Changes to systems within the development lifecycle shall be controlled by the use of formal change control procedures.	1	1	Risk Assessment	SOP-CORP-010 Operations Change Management
		A.14.2.3 Technical review of applications after operating platform changes	When operating platforms are changed, business critical applications shall be reviewed and tested to ensure there is no adverse impact on organizational operations or security.	1	1	Risk Assessment	SOP-CORP-010 Operations Change Management
		A.14.2.4 Restrictions on changes to software packages	Modifications to software packages shall be discouraged, limited to necessary changes and all changes shall be strictly controlled.	1	1	Risk Assessment	SOP-CORP-010 Operations Change Management
		A.14.2.5 Secure system engineering principles	Principles for engineering secure systems shall be established, documented, maintained and applied to any information system implementation efforts.	1	1	Risk Assessment	POL-ISP-010 Systems Development and Maintenance Security
		A.14.2.6 Secure development environment	Organizations shall establish and appropriately protect secure development environments for system development and integration efforts that cover the entire system development lifecycle.	1	1	Risk Assessment	SOP-CORP-010 Operations Change Management
		A.14.2.7 Outsourced development	The organization shall supervise and monitor the activity of outsourced system development.	1	1	Risk Assessment	N/A No outsourced development
		A.14.2.8 System security testing	Testing of security functionality shall be carried out during development.	1	1	Risk Assessment	POL-ISP-010 Systems Development and Maintenance Security
		A.14.2.9 System acceptance testing	Acceptance testing programs and related criteria shall be established for new information systems, upgrades and new versions.	1	1	Risk Assessment	POL-ISP-010 Systems Development and Maintenance Security SOP-ISP-004 Penetration Testing Procedure
	A.14.3 Test data	A.14.3.1 Protection of test data	Test data shall be selected carefully, protected and controlled.	1	1	Risk Assessment	POL-ISP-010 Systems Development and Maintenance Security
		Totals:		13	13		
A.15 Supplier relationships							
	A.15.1 Information security in supplier relationships	A.15.1.1 Information security policy for supplier relationships	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.	1	1	Risk Assessment	SOP-QA-002 Supplier Evaluation Form-QA-003 Supplier Evaluation Form 03-06.3 Supplier Management (Intelemage)
		A.15.1.2 Addressing security within supplier agreements	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.	1	1	Risk Assessment	Client Master Service Agreement (MSA)
		A.15.1.3 Information and communication technology supply chain	Agreements with suppliers shall include requirements to address the information security risks associated with information and communications technology services and product supply chain.	1	1	Risk Assessment	SOP-QA-002 Supplier Evaluation Form-QA-003 Supplier Evaluation Form

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	A.15.2 Supplier service delivery management	A.15.2.1 Monitoring and review of supplier services	Organizations shall regularly monitor, review and audit supplier service delivery.	1	1	Risk Assessment	SOP-QA-002 Supplier Evaluation Form-QA-003 Supplier Evaluation Form 03-06.3 Supplier Management (Intelegame)	
		A.15.2.2 Managing changes to supplier services	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.	1	1	Risk Assessment	SOP-QA-002 Supplier Evaluation Form-QA-003 Supplier Evaluation Form	
Totals:				5	5			
A.16 Information security incident								
	A.16.1 Management of information security incidents and improvements	A.16.1.1 Responsibilities and procedures	Management responsibilities and procedures shall be established to ensure a quick, effective and orderly response to information security incidents.	1	1	Risk Assessment	q SOP-IT-038 Event Management SOP-IT-040 Incident Management	
		A.16.1.2 Reporting information security events	Information security events shall be reported through appropriate management channels as quickly as possible.	1	1	Risk Assessment	POL-CORP-006 Corporate Incident Management Policy SOP-IT-038 Event Management SOP-IT-040 Incident Management	
		A.16.1.3 Reporting information security weaknesses	Employees and contractors using the organization's information systems and services shall be required to note and report any observed or suspected information security weaknesses in systems or services.	1	1	Risk Assessment	POL-CORP-006 Corporate Incident Management Policy SOP-IT-038 Event Management SOP-IT-040 Incident Management	
		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.	1	1	Risk Assessment	POL-CORP-006 Corporate Incident Management Policy SOP-IT-038 Event Management SOP-IT-040 Incident Management	
		A.16.1.5 Response to information security incidents	Information security incidents shall be responded to in accordance with the documented procedures.	1	1	Risk Assessment	POL-CORP-006 Corporate Incident Management Policy SOP-IT-038 Event Management SOP-IT-040 Incident Management	
		A.16.1.6 Learning from information security incidents	Knowledge gained from analyzing and resolving information security incidents shall be used to reduce the likelihood or impact of future incidents.	1	1	Risk Assessment	POL-CORP-006 Corporate Incident Management Policy SOP-IT-038 Event Management SOP-IT-040 Incident Management	
		A.16.1.7 Collection of evidence	The organization shall define and apply procedures for the identification, collection, acquisition and preservation of information, which can serve as evidence.	1	1	Risk Assessment	POL-ISP-013 Compliance Security	
Totals:				7	7			
A.17 Information security aspects of								
	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.	1	1	Risk Assessment	POL-CORP-006 Corporate Incident Management Policy OTHER-CORP-017 Business Continuity 01-03.3er Recovery (Intelegame)	

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		A.17.1.2 Implementing information security continuity	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.	1	1	Risk Assessment	OTHER-CORP-017 Business Continuity 01-03.3er Recovery (Intelegame)
		A.17.1.3 Verify, review and evaluate information security continuity	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.	1	1	Risk Assessment	OTHER-CORP-017 Business Continuity 01-03.3er Recovery (Intelegame)
	A.17.2 Redundancies	A.17.2.1 Availability of information processing facilities	Information processing facilities shall be implemented with redundancy sufficient to meet availability requirements.	1	1	Risk Assessment	OTHER-CORP-017 Business Continuity ITM P5.2 Data Backup Policy (Intelegame)
		Totals:		4	4		
A.18 Compliance							
	A.18.1 Compliance with legal and contractual requirements	A.18.1.1 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.	1	1	Risk Assessment	POL-ISP-013 Compliance Security
		A.18.1.2 Intellectual property rights	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.	1	1	Risk Assessment	POL-ISP-013 Compliance Security
		A.18.1.3 Protection of records	Records shall be protected from loss, destruction, falsification, unauthorized access and unauthorized release, in accordance with legislative, regulatory, contractual and business requirements.	1	1	Risk Assessment	POL-QA-008-04 Quality Policy, Quality Assurance: Standard Operating Procedures (SOPs) SOP-QA-001-11 Quality System Document Management.
		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.	1	1	Risk Assessment	POL-ISP-013 Compliance Security
		A.18.1.5 Regulation of cryptographic controls	Cryptographic controls shall be used in compliance with all relevant agreements, legislation and regulations.	1	1	Risk Assessment	Letter from Bureau of Industry and Security, Department of Commerce attesting compliance to regulation of cryptographic controls
	A.18.2 Information security reviews	A.18.2.1 Independent review of information security	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.	1	1	Risk Assessment	SOC2 - Description of Hosting Infrastructure Supporting the Medidata Clinical Cloud (MCC) for the period October 1, 2014 through September 30, 2015.
		A.18.2.2 Compliance with security policies and standards	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.	1	1	Risk Assessment	Internal QS Audit Report for Service Delivery Houston Data Center dated 01/20/2016
		A.18.2.3 Technical compliance review	Information systems shall be regularly reviewed for compliance with the organization's information security policies and standards.	1	1	Risk Assessment	Internal QS Audit Report for Service Delivery Houston Data Center dated 01/20/2016
		Totals:		8	8		