

Name	Description	Implement	Category	Status	Implement Risk Level (
AA1 - Uniq	Unique	Establish	Access Aut	Implement 2022-07-01	Low
AA2 - Uniq	Unique	Enforce	Access Aut	Not Implemented	Low
AA3 - Mult	Multi-factor authentic	Multi-	Access Aut	Not Implemented	Low
AC1 - Acce	Access to in-scope sys	A	Access Cor	Not Implemented	Low
AC2 - Acce	Management utilizes i	We	Access Cor	Not Implemented	Low
AC3 - Adm	Access to a generic ad		Access Cor	Not Implemented	Low
AC4 - User	Management perform	In order	Access Cor	Implement 2022-01-01	Low
AC5 - Segr	System components a	Customer	Access Cor	Not Implemented	Low
AC6 - Segr	Access to promote ch	Segregati	Access Cor	Not Implemented	Low
AM2.3 - As	All IT	Basic:	Asset Man	Not Implemented	-
AT1 - Infor	The organization utiliz		Awareness	Not Implemented	Low
AT2 - Infor	Employees are requir		Awareness	Implement 2022-01-01	Low
AT3 - Onbc	Designated customer	All	Awareness	Not Implemented	Low
AT4 - User	The organization has c	Create	Awareness	Not Implemented	Low
CM1 - Cha	A formal change man		Change M	Not Implemented	Low
CM2 - Eme	Emergency change re	Emergenc	Change M	Not Implemented	Low
CM3 - Soft	A formal system devel	Systems	Change M	Not Implemented	Low
CM4 - Cha	Changes that affect th	Ensure	Change M	Not Implemented	Low
CM5 - Cha	Changes to the applic	All	Change M	Not Implemented	Low
CM6 - Segr	Changes to applicatio	Developm	Change M	Not Implemented	Low
CPRA 1.1 -	The organization has c	The CPRA	Privacy Pol	Not Implemented	-
CPRA 2.1 -	The organization has c	CPRA sets	Privacy Rig	Not Implemented	-
CPRA 2.2 -	Requests from consur	CPRA	Privacy Rig	Not Implemented	-
CPRA 2.3 -	The organization shall	CPRA	Privacy Rig	Not Implemented	-
CPRA 2.4 -	Requests from consur	Under	Privacy Rig	Not Implemented	-
CPRA 2.5 -	Explicit notice is provi	The CPRA	Privacy Rig	Not Implemented	-
CPRA 2.6 -	Requests from consur	CPRA	Privacy Rig	Not Implemented	-
CPRA 2.7 -	The sale or sharing of	The right	Privacy Rig	Not Implemented	-
CPRA 2.8 -	The organization has r	Sensitive	Privacy Rig	Not Implemented	-
CPRA 2.9 -	The organization has c	Right to	Privacy Rig	Not Implemented	-
CPRA 2.10	Notice of financial inci	Organizati	Privacy Rig	Not Implemented	-
CPRA 2.11	The organization iden	The CPRA	Privacy Rig	Not Implemented	-
CPRA 3.1 -	The organization has f	Under	Privacy by	Not Implemented	-
CPRA 3.2 -	Employees and contra	CPRA	Privacy by	Implement 2023-02-21	-
CPRA 3.3 -	The organization has c	Only	Privacy by	Not Implemented	-
CPRA 3.4 -	Organizations assess t	Review	Privacy by	Not Implemented	-
CPRA 4.1 -	The organization shall	Unless it	Vendor M	Not Implemented	-
CPRA 4.2 -	The organization main	Service	Vendor M	Not Implemented	-
CPRA 5.1 -	Procedures are in plac	In order	Incident M	Not Implemented	-
CPRA 6.1 -	The organization cond	The CPRA	Data Secur	Not Implemented	-
CPRA 6.2 -	Reasonable security p	Under the	Data Secur	Not Implemented	-
CR1 - Back	Formal procedures th	An	Continuity	Not Implemented	-
CR2 - Data	Weekly full-system an	The	Continuity	Not Implemented	Low
CR3 - Back	Backup restoration te	The	Continuity	Not Implemented	-
CR4 - Redu	Multiple availability z	Create	Continuity	Not Implemented	-
CR5 - Busi	Business continuity pl	Documen	Continuity	Not Implemented	-

CR6 - Disas	Disaster recovery plan Document	Continuity	Not Implemented	Low	
DP1 - Ackn	All internal and external The	Data Privac	Not Implemented	Low	
DP2 - Colle	Personal information i	Data Privac	Not Implemented	Low	
DP3 - Choi	The organization comi	Under priv	Data Privac	Implement 2021-02-21	Low
DP4 - Auth	Organization creates a The	Data Privac	Not Implemented	Low	
DP5 - Rete	The organization retai	Private dat	Data Privac	Not Implemented	Low
DP6 - Cons	Consents obtained fro	Consent is	Data Privac	Not Implemented	-
DP7 - Data	The organization obta	Consent	Data Privac	Implement 2021-02-21	Low
DP8 - Data	The organization has a The data	Data Privac	Not Implemented	-	
DP9 - Data	The organization has a Identify an	Data Privac	Not Implemented	Low	
DP10 - Dat	The organization has a Implemen	Data Privac	Implement 2021-02-21	Low	
DP11 - Inf	The organization desc The	Data Privac	Not Implemented	Low	
DP12 - Per	Personal information The	Data Privac	Not Implemented	Low	
DP13 - Priv	The organization has a	Data Privac	Not Implemented	Low	
DP14 - Priv	Organization has docu	Data Privac	Not Implemented	Low	
DP15 - Up	Organization corrects, Data subje	Data Privac	Not Implemented	-	
DP16 - Usa	Usage of personal inf	The purpos	Data Privac	Not Implemented	Low
DS1 - Infor	The organization has f	Procedure	Data Secur	Not Implemented	Low
DS2 - Mask	Production data is ma	Basic:	Data Secur	Not Implemented	-
DS4 - Data	Formal data retention The	Data Secur	Not Implemented	Low	
DS5 - Equi	Equipment with data	All storage	Data Secur	Not Implemented	-
DS6 - Acce	Access to production	If the prod	Data Secur	Not Implemented	-
G - Awarer	Employees and contra	Formal	Data Privac	Implement 2023-02-01	-
G - Breach	Data breach risk asses	A	Data Breac	Not Implemented	-
G - Data Pr	Organization has desi	The DPO re	Data Privac	Not Implemented	-
G - Data Pr	Data Protection policy	A data pro	Data Privac	Not Implemented	-
G - Employ	The organization has a	The	Data Privac	Not Implemented	-
G - EU Rep	Organization has desi	This requir	Data Privac	Not Implemented	-
G - Interna	The organization iden	In GDPR,	Data Trans	Not Implemented	-
G - Privacy	Organization has a pri	The	Data Privac	Not Implemented	-
G - Process	Organization maintain	Document	Data Privac	Not Implemented	-
G - Record	Organization maintain	Create	Data Privac	Not Implemented	-
G - Retenti	The organization retai	Personal d	Data Privac	Not Implemented	-
G - Securit	Appropriate technical	Technical	Data Secur	Not Implemented	-
G - Vendor	A vendor managemen	GDPR	Vendor M	Not Implemented	-
GC - Acces	Access requests from	An individu	Data Subje	Not Implemented	-
GC - Breac	Notifications are prov	A	Data Breac	Not Implemented	-
GC - Breac	Notifications are prov	In the case	Data Breac	Not Implemented	-
GC - Conse	Explicit consent is obt	Conse	Data Privac	Not Implemented	-
GC - Contr	Organization maintain	The	Vendor M	Not Implemented	-
GC - Data F	The organization asse	GDPR	Data Privac	Not Implemented	-
GC - Data S	Organization has estal	GDPR data	Data Subje	Not Implemented	-
GC - Lawfu	Organization determin	Review ea	Data Privac	Not Implemented	-
GC - Reque	Access requests from	The data s	Data Subje	Not Implemented	-
GC - Reque	Access requests from	Data subje	Data Subje	Not Implemented	-
GC - Right	Access requests from	The GDPR	Data Subje	Not Implemented	-
GC - Withd	The organization resp	Data	Data Privac	Not Implemented	-

GP - Autho	Organization obtains f	Without	Vendor M	Not Implemented	-
GP - Breac	Notifications are prov	A personal	Data Breac	Not Implemented	-
GP - Contr	Organization maintain	The	Vendor M	Not Implemented	-
GP - Reque	Requests received fro	Data Proce	Data Subje	Not Implemented	-
HR1 - Secu	Information security r	Informati	Human Re	Not Implemented	Low
HR2 - Job	Job descriptions that	c Employee	Human Re	Not Implemented	Low
HR3 - Orga	Organization has estal	The	Human Re	Not Implemented	Low
HR4 - Perf	The organization has	c	Human Re	Not Implemented	Low
HR5 - Trair	The organization has	c Managem	Human Re	Not Implemented	Low
HR6 - Back	New employees and c	Backgrou	Human Re	Not Implemented	Low
IC4.0 - Info	Information is classifi	c Review	Informatio	Implement 2021-02-21	Low
IC4.2 - Info	Assets are handled in	Follow use	Informatio	Implement 2021-02-21	Low
IC4.4 - Info	Rules for the acceptat	Ensure tha	Informatio	Implement 2021-02-21	Low
IC4.6 - Dat	An input validation sy	Add valida	Informatio	Not Implemented	-
IM1 - Cust	The	Implemen	Incident M	Not Implemented	Low
IM2 - Data	Notifications regardin	Create	Incident M	Not Implemented	Low
IM3 - Incid	A formal incident mar	Incidents	Incident M	Not Implemented	Low
IM4 - Incid	All incidents related t	c The	Incident M	Not Implemented	Low
IM5 - Incid	Management has esta	Managem	Incident M	Not Implemented	Low
IM6 - Less	c Management incorpor	An	Incident M	Not Implemented	Low
OM1 - Ass	The organization mair	Identify	Organizati	Not Implemented	Low
OM1.0 - Pr	Describe your organiz	Below is a	Organizati	Implement 2021-02-21	Low
OM2 - Boa	The Board of Director	The Board	Organizati	Not Implemented	Low
OM2.1 - Se	The security team is d	Document	Organizati	Implement 2021-02-21	Low
OM2.3 - C	Requirements for con	Organizati	Organizati	Implement 2021-02-21	Low
OM3 - Boa	The Board of Director	The Board	Organizati	Not Implemented	Low
OM4 - Cod	The organization has	c	Organizati	Not Implemented	Low
OM5 - Em	The organization has	c The	Organizati	Not Implemented	Low
OM6 - Exe	The organization's exe	An executi	Organizati	Not Implemented	Low
OM7 - For	The organization has	f The securit	Organizati	Not Implemented	Low
OM8 - Inte	The organization uses		Organizati	Not Implemented	Low
OM9 - Rep	The organization has	c Whistlebl	Organizati	Not Implemented	Low
OM10 - Re	New customer contra	Establish a	Organizati	Not Implemented	Low
PE1 - Envir	Environm	Not	Physical an	Not Implemented	-
PE2 - Moni	Operational personne	Environme	Physical an	Not Implemented	-
PE3 - Physi	Access to data center	c Access to	Physical an	Not Implemented	-
PE4 - Physi	Physical access to the	Physical	Physical an	Not Implemented	-
PE5 - Physi	Management utilizes	c As part of	Physical an	Not Implemented	-
PE6 - Physi	Physical security conti	Implemen	Physical an	Not Implemented	-
PE7 - Revi	Physical access to dat	c Access to	Physical an	Not Implemented	-
PE8 - Revi	Physical access to the	The	Physical an	Not Implemented	-
PI1 - Acces	Processes have been	i The organi	Processing	Not Implemented	-
PI2 - Archi	Organization archives	System rec	Processing	Not Implemented	-
PI3 - Data	I Data integrity policy	a Organizati	Processing	Not Implemented	-
PI4 - Error	Organization has impl	Error checl	Processing	Not Implemented	-
PI5 - Integr	The organization has	f Data integ	Processing	Not Implemented	-
PI6 - Loggi	The organization logs	The	Processing	Not Implemented	-

PI7 - Proce	Automate	Ensure hov	Processing	Not Implemented	-
PI8 - Recor	Input record counts at	When the	Processing	Not Implemented	-
RM1 - Fina	Management maintain	Insurance	Risk Mana	Not Implemented	Low
RM2 - Risk	Management perform A risk		Risk Mana	Not Implemented	Low
RM2.1 - 3r	3rd party vendors are	Create ven	Risk Mana	Not Implemented	-
RM2.2 - Th	Formal agreements ar	Add langua	Risk Mana	Implement 2021-02-2	Low
SO1 - Anti	Antivirus software is i	Anti-virus	Security O	Not Implemented	Low
SO2 - Auto	Infrastructure has bee	The organi	Security O	Not Implemented	Low
SO2.0 - Inc	Incident Response che	Create an i	Security O	Implement 2021-02-2	Low
SO3 - Base	Baseline configuratio	Baseline	Security O	Not Implemented	Low
SO4 - Encr	The organization uses	Storage of	Security O	Not Implemented	Low
SO5 - Encr	Customer data is encr		Security O	Not Implemented	Low
SO6 - Encr	Encryption technologi	Ensure	Security O	Not Implemented	Low
SO7 - Fore	Future processing den	Process sh	System Op	Not Implemented	-
SO8 - Intru	Intrusion detection or	The IPS	Security O	Not Implemented	-
SO9 - Log	A log management pr	Establish a	Security O	Not Implemented	Low
SO10 - Mo	A centralized mobile c	The	Security O	Not Implemented	-
SO11 - Net	A formal network diag	Maintain	Security O	Not Implemented	Low
SO12 - Pat	A patch management	The	Security O	Not Implemented	Low
SO13 - Pen	A penetration test is p	Penetrati	Security O	Not Implemented	Low
SO14 - Sec	Logging is enabled to		Security O	Implement 2021-12-1	Low
SO15 - Syst	System firewalls are c		Security O	Not Implemented	Low
SO16 - Syst	IT team continuously	For	Security O	Not Implemented	-
SO17 - Vul	Vulnerability scan is p	Vulnerabil	Security O	Not Implemented	Low
SS7 - Serve	Serverless functions a		Serverless	Not Implemented	-
VM1 - Thir	Third-party contractor	All third-	Organizati	Not Implemented	Low
VM2 - Ven	On an annual basis, m	Organizati	Vendor M	Not Implemented	Low
VM3 - Ven	A vendor managemen		Vendor M	Not Implemented	Low
VM4 - Ven	Vendor management	Organizati	Vendor M	Not Implemented	Low
WS1 - Anti	Security software (fire	Install	Workstatic	Not Implemented	Low
WS2 - Wor	Disk encryption and s	Enable	Workstatic	Implement 2022-01-1	Low
WS3 - Wor	A patch management	Patch	Workstatic	Not Implemented	Low

Policies	Framework Codes
Access Control	CC6.1
Access Control	CC6.1
Access Control	CC6.1
Access Control	CC6.1, CC6.2, CC6.3
Access Control	CC6.1, CC6.2, CC6.3
Access Control	CC6.3, CC6.8
Access Control	CC6.2, CC6.3
Access Control	CC6.1, C1.1
Change Management	CC6.3, CC8.1
IT Asset Management	
Information Security	CC1.4, CC2.2, CC5.3
Personnel Security	CC1.4, CC2.2
Personnel Security	CC2.1, CC2.3
Customer Support and	CC2.1, CC2.2, CC2.3
Change Management	CC6.8, CC8.1
Change Management	CC8.1
Software Development	CC8.1
Change Management	CC2.2, CC8.1
Change Management	CC8.1
Change Management	CC8.1
Privacy Policy for Web	1798.100, 1798.130(a)(5)
Consumer Rights Policy	1798.130(a)(1), 1798.100, 1798.105, 1798.106, 1798.110, 1798.115
Consumer Rights Policy	1798.105, 1798.130(a)(2), 1798.145(h)(1)
Consumer Rights Policy	1798.106, 1798.130(a)(2), 1798.145(h)(1)
Consumer Rights Policy	1798.110, 1798.115, 1798.130(a)(2), 1798.130(a)(3)(B)(i), 1798.130(a)(7), 1798.145(h)(1)
Consumer Rights Policy	1798.120(d), 1798.120(b), 1798.115(c), 1798.135(a), 1798.135(b)
Consumer Rights Policy	1798.120, 1798.120(d), 1798.135(a), 1798.135(b), 1798.135(c)(6)
Consumer Rights Policy	1798.120(c), 1798.120(d)
Consumer Rights Policy	1798.140(ae), 1798.121(b), 1798.121(c), 1798.121, 1798.135, 1798.135(a), 1798.135(b)
Consumer Rights Policy	1798.125
Consumer Rights Policy	1798.125(b), 1798.125(b)(3)
Consumer Rights Policy	1798.185(a)(16)
Internal Privacy Policy	1798.140(ab)
Information	1798.135(c)(3), 1798.130(a)(6)
Internal	1798.100(c)
Privacy Impact Assessment	1798.185(a)(15)(B)
Consumer Rights Policy	1798.105(c)(3), 1798.106
Vendor Management	1798.100(d), 1798.105(c)(3), 1798.121(c), 1798.130(a)(3)(A)
Incident Management	1798.150, 1798.155
Information Security	1798.185(a)(15)(A)
Information	1798.100(e)
Backup and Restoration	A1.2
Backup	CC7.4, A1.2, PI1.4
Backup and Restoration	A1.3
Business Continuity and	A1.2
Business Continuity and	A1.3

Business Continuity ar CC7.4, A1.2, A1.3

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Informati P3.1

Privacy Policy for Wet P2.1

Informati P6.2

Informati P4.2

Data P3.2

Privacy Policy for Wet P2.1, P3.1, P3.2, P4.1

Privacy Policy for Wet P7.1

Informati P1.1, P8.1

Privacy Policy for Wet P5.1, P5.2, P6.7

Informati P3.1

Informati P4.3

Informati P1.1, P4.2, P6.1

Risk Assessment P8.1

Privacy Policy for Wet P5.2

Informati P4.1

Information Classifica C1.1

Software Developer CC8.1, C1.1, CC6.7

Data Retention and Di CC6.5, C1.1, C1.2, P4.2, P4.3

Technology Equipmen CC6.5, C1.2

Software Developer CC8.1, C1.1, CC6.7

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Vendor Management Article, 28

Data Subject Rights Pr Article, 15, 16

GDPR Breach Notifica Article, 34

GDPR Breach Notifica Article, 33

Internal Privacy Policy Article, 7, 8

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Data Article, 35, 36

Data Subject Rights Pr Article, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 77, 79, 80, 82

Internal Privacy Policy Article, 6

Data Subject Rights Pr Article, 17, 19

Data Subject Rights Pr Article, 18, 21

Data Subject Rights Pr Article, 20

Data Subject Rights Pr Article, 7, 8

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Informati	CC1.3
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Personnel Security	CC1.4
Personnel Security	CC1.4
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Information Classification	
Information Classification	
Information Classification	
Incident Management	CC2.3, CC7.4
Incident Management	CC7.3, CC7.4, P6.3, P6.6, P8.1
Incident Management	CC2.2, CC2.3, CC7.2, CC7.3, CC7.4, P6.3, P8.1
Incident Management	CC7.2, CC7.3, CC7.4, CC7.5, P8.1
Incident Management	CC7.4
Incident Management	CC7.3, CC7.4, CC7.5
IT Asset Management	CC6.1, PI1.1
Product/Services Scope	
Information Security	CC1.2, CC2.2, CC2.3
Information Security	
Information Security	
Information Security	CC1.2
Corporate Ethics	CC1.1
Acceptable Use	CC1.1, CC1.5, CC2.2
Information Security	CC1.2, CC2.2, CC4.1, CC5.1, CC5.3
Information Security	CC2.3, P3.1
Information Security	CC1.5, CC2.1, CC4.1, CC4.2, CC5.1, CC5.2, CC5.3, P8.1
Incident Management	CC1.1, CC1.5, CC2.2, CC2.3
Information Security	CC2.3
Physical and Environr	A1.2
Physical and Environr	A1.2
Physical and Environr	CC6.4
Physical and Environr	CC6.4
Access	CC6.4
Physical and Environr	CC6.4
Physical and Environr	CC6.4
Physical and Environr	CC6.4
Data Integrity	PI1.4, PI1.5
Data Integrity	PI1.5
Data Integrity	PI1.1, PI1.2, PI1.3, PI1.4
Data Integrity	PI1.3
Data Integrity	PI1.1
Data Integrity	PI1.4

Data Integrity	PI1.2
Data Integrity	PI1.2, PI1.3, PI1.4
Risk Assessment	CC9.1
Risk Assessment	CC3.1, CC3.2, CC3.3, CC3.4, CC9.1
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Vendor Management	
Information Security	CC6.8
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Change Management	CC6.8, CC7.1, CC8.1
Key Management and	CC6.1, CC6.6, CC6.7
Key Management and	CC6.1, CC6.7, PI1.4, PI1.5
Key Management and	CC6.1, CC6.6, CC6.7
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Network Security	CC6.6, CC7.2
Network Security	CC7.1
Workstation Security	CC6.8
Network Security	CC6.1, CC6.6
Change Management	CC7.5
Vulnerability Manager	CC4.1, CC7.1
Server Security	CC7.1, CC7.2
Network Security	CC6.6, CC7.2
Network Security	CC7.2, A1.1
Vulnerability Manager	CC4.1, CC7.1, CC7.4
Serverless Security	CC6.2, CC6.3
Vendor Management	CC1.1, CC2.2
Vendor Management	CC1.4, CC4.1, CC6.4, CC9.2
Vendor Management	CC1.4, CC3.2, CC3.4, CC9.2
Vendor Management	CC9.2
Bring Your	CC6.8
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Bring Your	CC7.5

, 1798.130(a)(3)(B)(iii)