

CC 1.3

Board oversight briefings conducted

Board charter documented

COSO Principle 3: Management establishes, with board oversight, structures, reporting lines, and appropriate authorities and the pursuit of objectives.

Administrative

Administrative

Unassigned

Unassigned

CC 1.2

CC 1.2 · CC 1.3

0/1

0/1

	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE				
	Board charter documented	O 0/1	Administrative	Unassigned	CC 1.2 · CC 1.3				
	Organization structure documented	0/1	Administrative	Unassigned	CC 1.3				
	Roles and responsibilities specified	0/2	Administrative	Unassigned	CC 1.3 · CC 1.4 ·				
	Management roles and responsibil	0/2	Administrative	Unassigned	CC 1.3 · CC 2.2				
CC	1.4 D Principle 4: The entity demonstrates a	commitment to attra	ct, develop, and reta	ain competent individ	duals in alignment v				
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE				
	Employee background checks perf	O 0/3	Administrative	Unassigned	CC 1.1 · CC 1.4				
	Performance evaluations conducted	O 0/1	Administrative	Unassigned	CC 1.1 · CC 1.4 · (
	Roles and responsibilities specified	0/2	Administrative	Unassigned	CC 1.3 · CC 1.4 ·				
	Security awareness training imple	O 1/4	Administrative	Unassigned	CC 1.4 · CC 2.2				
cosc	1.5 Description Principle 5: The entity holds individuals	accountable for the	ir internal control re:	sponsibilities in the p	oursuit of objectives				
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE				
	Performance evaluations conducted	O 0/1	Administrative	Unassigned	CC 1.1 · CC 1.4 · (
	Code of Conduct acknowledged b	0/2	Administrative	Unassigned	CC 1.1 · CC 1.5				
	Roles and responsibilities specified	0/2	Administrative	Unassigned	CC 1.3 · CC 1.4 ·				
	CC 2.1 COSO Principle 13: The entity obtains or generates and uses relevant, quality information to support the functioning of internal								
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE				
	Control self-assessments conduct	O 1/1	Administrative	Unassigned	CC 2.1 · CC 4.1 ·				
	Vulnerabilities scanned and remed	0/3	Technical	Unassigned	CC 2.1 · CC 4.1 ·				
	Log management utilized	O 1/3	Technical	Unassigned	CC 2.1 · CC 7.2				

COSO Principle 14: The entity internally communicates information, including objectives and responsibilities for internal control support the functioning of internal control. CONTROL **EVIDENCE STATUS** OWNER CATEGORY STANDARD CODE Roles and responsibilities specified CC 1.3 · CC 1.4 · I 0/2 Administrative Unassigned 0/2 Administrative Unassigned CC 1.3 · CC 2.2 Management roles and responsibil... 1/4 CC 1.4 · CC 2.2 Security awareness training imple... Administrative Unassigned CC 2.2 System changes communicated 0/1 Administrative Unassigned Whistleblower policy established 0/2 Administrative Unassigned CC 2.2 CC 2.2 · CC 2.3 Service description communicated 0/2 Administrative Unassigned Security policies established and r... Administrative Unassigned CC 2.2 · CC 5.1 · 2/17 Administrative Incident response policies establis... 0/1 Unassigned CC 2.2 · CC 5.3 · CC 2.3 COSO Principle 15: The entity communicates with external parties regarding matters affecting the functioning of internal cont CONTROL **EVIDENCE STATUS** CATEGORY OWNER STANDARD CODE Service description communicated 0/2 Administrative Unassigned CC 2.2 · CC 2.3 Administrative CC 2.3 Company commitments externally ... 0/3 Unassigned External support resources available 0/2 Administrative Unassigned CC 2.3 Support system available 0/3 Technical Unassigned CC 2.3 System changes externally comm... 0/4 Administrative Unassigned CC 2.3 Third-party agreements established 0/4 Administrative Unassigned CC 2.3 · CC 9.2 CC 3.1 COSO Principle 6: The entity specifies objectives with sufficient clarity to enable the identification and assessment of risks re objectives. CONTROL **EVIDENCE STATUS** CATEGORY OWNER STANDARD CODE 0/1 Risk management program establi... Administrative Unassigned CC 3.1 · CC 3.2 · Risk assessment objectives specifi... 0/2 Administrative Unassigned CC 3.1 · CC 5.3

	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Risk management program establi	O/1	Administrative	Unassigned	CC 3.1 · CC 3.2
	Risks assessments performed	O/1	Administrative	Unassigned	CC 3.2 · CC 3.3
	Vendor management program esta	0/3	Administrative	Unassigned	CC 3.2 · CC 4.1
	Continuity and disaster recovery p	0/2	Administrative	Unassigned	CC 3.2 · CC 7.5
	3.3 SO Principle 8: The entity considers the p	otential for fraud in a	ssessing risks to the	e achievement of o	bjectives.
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Risk management program establi	O/1	Administrative	Unassigned	CC 3.1 · CC 3.2
	Risks assessments performed	0/1	Administrative	Unassigned	CC 3.2 · CC 3.3
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Risk management program establi	0/1	Administrative	Unassigned	CC 3.1 · CC 3.2
	Risk management program establi Risks assessments performed	0/1	Administrative Administrative	Unassigned	
					CC 3.1 · CC 3.2 CC 3.2 · CC 3.3 CC 3.4 · CC 4.1
	Risks assessments performed	0/1	Administrative	Unassigned	CC 3.2 · CC 3.3
CC	Risks assessments performed Penetration testing performed	0/1 0/4 0/2	Administrative Technical Technical	Unassigned Unassigned Unassigned	CC 3.2 · CC 3.3 CC 3.4 · CC 4.1 CC 3.4 · CC 7.1
CC	Risks assessments performed Penetration testing performed Configuration management syste 4.1 60 Principle 16: The entity selects, development syste	0/1 0/4 0/2	Administrative Technical Technical	Unassigned Unassigned Unassigned	CC 3.2 · CC 3.3 CC 3.4 · CC 4.1 CC 3.4 · CC 7.1
CC	Risks assessments performed Penetration testing performed Configuration management syste 4.1 O Principle 16: The entity selects, development control are present and functioning.	0/1 0/4 0/2 ps, and performs one	Administrative Technical Technical	Unassigned Unassigned Unassigned	CC 3.2 · CC 3.3 CC 3.4 · CC 4.1 CC 3.4 · CC 7.1
CC	Risks assessments performed Penetration testing performed Configuration management syste 4.1 SO Principle 16: The entity selects, develornal control are present and functioning. CONTROL	O 0/1 O 0/4 O 0/2 ps, and performs ong EVIDENCE STATUS	Administrative Technical Technical going and/or separa	Unassigned Unassigned Unassigned te evaluations to a	CC 3.2 · CC 3.3 CC 3.4 · CC 4.1 CC 3.4 · CC 7.1 scertain whether the

Penetration testing performed

0/4

Technical

Unassigned

CC 3.4 · CC 4.1 ·

COS	4.2 O Principle 17: The entity evaluates and ong corrective action, including senior mar			-	er to those parties
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Control self-assessments conduct	O 1/1	Administrative	Unassigned	CC 2.1 · CC 4.1
	Vendor management program esta	0/3	Administrative	Unassigned	CC 3.2 · CC 4.1
	5.1 O Principle 10: The entity selects and deceptable levels.	velops control activit	ies that contribute t	o the mitigation of	risks to the achieve
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Security policies established and r	O 2/17	Administrative	Unassigned	CC 2.2 · CC 5.1
	Risk management program establi	O/1	Administrative	Unassigned	CC 3.1 · CC 3.2
	CONTROL Security policies established and r	EVIDENCE STATUS 2/17	CATEGORY	OWNER Unassigned	STANDARD CODE
	Security policies established and r	O 2/17	Administrative	Unassigned	CC 2.2 · CC 5.1
	Development lifecycle established	0/1	Administrative	Unassigned	CC 5.2 · CC 5.3
	Access control procedures establi	1 /4	Administrative	Unassigned	CC 5.2 · CC 6.1
cos	5.3 O Principle 12: The entity deploys contro action.	l activities through p	olicies that establish	n what is expected	and in procedures
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Roles and responsibilities specified	O/2	Administrative	Unassigned	CC 1.3 · CC 1.4
	Security policies established and r	O 2/17	Administrative	Unassigned	CC 2.2 · CC 5.1
	Incident response policies establis	O/1	Administrative	Unassigned	CC 2.2 · CC 5.3
	Risk management program establi	O/1	Administrative	Unassigned	CC 3.1 · CC 3.2

	Vendor management program esta	0/3	Administrative	Unassigned	CC 3.2 · CC 4.1 ·
	Development lifecycle established	0/1	Administrative	Unassigned	CC 5.2 · CC 5.3
	Backup processes established	0/3	Administrative	Unassigned	CC 5.3
	Data retention procedures establis	0/1	Administrative	Unassigned	CC 5.3 · CC 6.5
	Change management procedures	0/2	Technical	Unassigned	CC 5.3 · CC 7.1 ·
	5.1 ntity implements logical access security security events to meet the entity's object		ure, and architecture	es over protected inf	ormation assets to
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Access control procedures establi	1 /4	Administrative	Unassigned	CC 5.2 · CC 6.1 ·
	Data classification policy establish	O/1	Administrative	Unassigned	CC 6.1
	Data encryption utilized	0/0	Technical	Unassigned	CC 6.1
	Encryption key access restricted	O/1	Technical	Unassigned	CC 6.1
	Firewall access restricted	O 2/2	Technical	Unassigned	CC 6.1
	Network segmentation implemented	0/1	Technical	Unassigned	CC 6.1
	Password policy enforced	O 1/1	Technical	Unassigned	CC 6.1
	Production application access rest	O 1/1	Technical	Unassigned	CC 6.1
	Production database access restri	O/0	Technical	Unassigned	CC 6.1
	Production inventory maintained	0/3	Administrative	Unassigned	CC 6.1
	Production network access restric	O 0/0	Technical	Unassigned	CC 6.1
	Production OS access restricted	O 1/1	Technical	Unassigned	CC 6.1
	Unique account authentication enf	O 1/1	Technical	Unassigned	CC 6.1
	Unique production database authe	0/0	Technical	Unassigned	CC 6.1
	Access requests required	1/2	Administrative	Unassigned	CC 6.1 · CC 6.2 ·
	Unique network system authentica	0/0	Technical	Unassigned	CC 6.1 · CC 6.2 ·
	Remote access encrypted enforced	0/0	Technical	Unassigned	CC 6.1 · CC 6.6
	Pamota access MEA enforced	0.0/1	Technical	Unassigned	CC 61, CC 66

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	Production deployment access res	0/2	Technical	Unassigned	CC 6.1 · CC 8.1
acce	6.2 to issuing system credentials and grantings is administered by the entity. For those access is no longer authorized.				
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Access control procedures establi	1/4	Administrative	Unassigned	CC 5.2 · CC 6.1 ·
	Access requests required	1/2	Administrative	Unassigned	CC 6.1 · CC 6.2 ·
	Unique network system authentica	O 0/0	Technical	Unassigned	CC 6.1 · CC 6.2 ·
	Access reviews conducted	3 /4	Administrative	Unassigned	CC 6.2 · CC 6.3 ·
	Access revoked upon termination	O 1/3	Administrative	Unassigned	CC 6.2 · CC 6.3 ·
respo	entity authorizes, modifies, or removes aconsibilities, or the system design and chantity's objectives.				
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Access control procedures establi	1/4	Administrative	Unassigned	CC 5.2 · CC 6.1 ·
	Access requests required) 1/2	Administrative	Unassigned	CC 6.1 · CC 6.2 ·
	Unique network system authentica	O 0/0	Technical	Unassigned	CC 6.1 · CC 6.2 ·
	Access reviews conducted	3 /4	Administrative	Unassigned	CC 6.2 · CC 6.3 ·
	Access revoked upon termination	1 /3	Administrative	Unassigned	CC 6.2 · CC 6.3 ·
	6.4 entity restricts physical access to facilitie other sensitive locations) to authorized pe			example, data center	facilities, back-up
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Access reviews conducted	3 /4	Administrative	Unassigned	CC 6.2 · CC 6.3 ·
	Data center access reviewed	O 0/1	Physical	Unassigned	CC 6.4
	Physical access processes establi	O 0/1	Physical	Unassigned	CC 6.4

	Visitor procedures enforced	0/1	Physical	Unassigned	CC 6.4
СС	6.5				
	entity discontinues logical and physical e assets has been diminished and is no			,	d or recover data
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CO
	Data retention procedures establis	0/1	Administrative	Unassigned	CC 5.3 · CC 6
	Access revoked upon termination	O 1/3	Administrative	Unassigned	CC 6.2 · CC 6
	Asset disposal procedures utilized	O 1/3	Administrative	Unassigned	CC 6.5
	Customer data deleted upon leave	0/2	Technical	Unassigned	CC 6.5
CC	6.6				
	entity implements logical access securit	y measures to protec	t against threats fro	m sources outside	its system bound
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CO
	Unique network system authentica	0/0	Technical	Unassigned	CC 6.1 · CC 6
	Remote access encrypted enforced	0/0	Technical	Unassigned	CC 6.1 · CC 6
	Remote access MFA enforced	O 0/1	Technical	Unassigned	CC 6.1 · CC 6
	Network firewalls reviewed	O 1/1	Technical	Unassigned	CC 6.6
	Network firewalls utilized	O 1/1	Technical	Unassigned	CC 6.6
	Data transmission encrypted	O 4/5	Technical	Unassigned	CC 6.6 · CC 6
	Service infrastructure maintained	0/2	Technical	Unassigned	CC 6.6 · CC 6
	Intrusion detection system utilized	0/3	Technical	Unassigned	CC 6.6 · CC 7

	Portable media encrypted	0/3	Technical	Unassigned	CC 6.7
	6.8 entity implements controls to prevent or ctives.	detect and act upon	the introduction of	unauthorized or m	alicious software to
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Development lifecycle established	0/1	Administrative	Unassigned	CC 5.2 · CC 5.3
	Service infrastructure maintained	0/2	Technical	Unassigned	CC 6.6 · CC 6.8
	Anti-malware technology utilized) 1/2	Technical	Unassigned	CC 6.8
	eet its objectives, the entity uses detected duction of new vulnerabilities, and (2) so	0 1		,	onfigurations that re
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Vulnerabilities scanned and remed	0/3	Technical	Unassigned	CC 2.1 · CC 4.1
	Risks assessments performed	0/1	Administrative	Unassigned	CC 3.2 · CC 3.3
	Configuration management syste	0/2	Technical	Unassigned	CC 3.4 · CC 7.1
	Change management procedures	0/2	Technical	Unassigned	CC 5.3 · CC 7.1
	Vulnerability and system monitorin	0/1	Administrative	Unassigned	CC 7.1 · CC 7.2
The e	7.2 entity monitors system components and sters, and errors affecting the entity's atts.				
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Vulnerabilities scanned and remed	0/3	Technical	Unassigned	CC 2.1 · CC 4.1
	Log management utilized	O 1/3	Technical	Unassigned	CC 2.1 · CC 7.2
	Penetration testing performed	0/4	Technical	Unassigned	CC 3.4 · CC 4.1
	Service infrastructure maintained	0/2	Technical	Unassigned	CC 6.6 · CC 6.8
	Intrusion detection system utilized	0/3	Technical	Unassigned	CC 6.6 · CC 7.2
	Vulnerability and system monitorin	0/1	Administrative	Unassigned	CC 7.1 · CC 7.2

	Infrastructure performance monito	1/5	Technical	Unassigned	CC 7.2
СС	7.3				
	entity evaluates security events to deter ents) and, if so, takes actions to prevent	-		d in a failure of the	entity to meet its obj
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Incident response policies establis	O/1	Administrative	Unassigned	CC 2.2 · CC 5.3 ·
	Incident management procedures	0/2	Administrative	Unassigned	CC 7.3 · CC 7.4 ·
CC The e	7.4 entity responds to identified security inc	idents by executing a	a defined incident re	esponse program to	understand contain
	nunicate security incidents, as appropria				
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Vulnerabilities scanned and remed	0/3	Technical	Unassigned	CC 2.1 · CC 4.1 ·
	Incident response policies establis	O/1	Administrative	Unassigned	CC 2.2 · CC 5.3 ·
	Service infrastructure maintained	0/2	Technical	Unassigned	CC 6.6 · CC 6.8 ·
	Incident management procedures	0/2	Administrative	Unassigned	CC 7.3 · CC 7.4 ·
	Incident response plan tested	0/3	Administrative	Unassigned	CC 7.4 · CC 7.5
CC The e	7.5 entity identifies, develops, and implemen	its activities to recov	er from identified se	ecurity incidents.	
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Incident response policies establis	O/1	Administrative	Unassigned	CC 2.2 · CC 5.3 ·
	Continuity and disaster recovery p	0/2	Administrative	Unassigned	CC 3.2 · CC 7.5
	Incident management procedures	0/2	Administrative	Unassigned	CC 7.3 · CC 7.4 ·
	Incident response plan tested	0/3	Administrative	Unassigned	CC 7.4 · CC 7.5
	8.1 entity authorizes, designs, develops or a vare, and procedures to meet its objectiv		documents, tests, a	pproves, and impler	nents changes to infi
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE

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	Vulnerabilities scanned and remed	0/3	Technical	Unassigned	CC 2.1 · CC 4.1 ·
	Penetration testing performed	0/4	Technical	Unassigned	CC 3.4 · CC 4.1 ·
	Development lifecycle established	O/1	Administrative	Unassigned	CC 5.2 · CC 5.3
	Change management procedures	0/2	Technical	Unassigned	CC 5.3 · CC 7.1 ·
	Production deployment access res	0/2	Technical	Unassigned	CC 6.1 · CC 8.1
	Service infrastructure maintained	0/2	Technical	Unassigned	CC 6.6 · CC 6.8
	Network and system hardening st	O 1/1	Administrative	Unassigned	CC 6.6 · CC 8.1
CC The	9.1 entity identifies, selects, and develops r	isk mitigation activitie	es for risks arising fr	om potential busine	ess disruptions.
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Risk management program establi	0 0/1	Administrative	Unassigned	CC 3.1 · CC 3.2 ·
	Risks assessments performed	O 0/1	Administrative	Unassigned	CC 3.2 · CC 3.3
	Continuity and Disaster Recovery	0/1	Administrative	Unassigned	CC 9.1
	Cybersecurity insurance maintained	0/1	Administrative	Unassigned	CC 9.1
	9.2 entity assesses and manages risks asso	ciated with vendors a	and business partne	rs.	
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	Third-party agreements established	0/4	Administrative	Unassigned	CC 2.3 · CC 9.2
	Vendor management program esta	0/3	Administrative	Unassigned	CC 3.2 · CC 4.1 ·
	- SOC 2 ription of the organization's system and	commitments for Se	ction III of the audit	report	
	CONTROL	EVIDENCE STATUS	CATEGORY	OWNER	STANDARD CODE
	SOC 2 - System Description	O 1/1	Administrative	Unassigned	SD - SOC 2