

## ISO 27701 CHECKLIST

### 1 – SCOPE

- Identify the people, processes and technology that support your business.
  - Have you identified the relevant stakeholders needs relevant for your product/service?
  - Have you identified the most relevant laws and regulations relevant for your product/service?
  - Have you identified a critical physical location relevant for your product/service?

### 2 – STAGES

- Identify the people, processes, technology, stakeholders needs, applicable legislations, location that support your business. Both stages are performed during an ISO 27701 audit
  - Stage 1 if you were asked to demonstrate the design and execution of controls
  - Stage 2 if you were asked to demonstrate operating effectiveness of controls over a period of time

### 3 – GAP ANALYSIS

- Identify your current documentation posture
  - Have you specified and properly documented the activities and procedures that make up your company's control environment?
    - Do you review documents on a regular basis to make sure they are up to date and accurate?
    - Do you have your Information Security Management System (ISMS) policy documented?
    - Do you have your Privacy Management System (PIMS) policy documented?
    - Do you have a list of your subprocessors updated and accurate?
    - Do you have your data processing agreement updated and documented?
- Identify your current control environment posture
  - What is the organization's governance structure?
  - What are the executive leadership and management tone and example?
  - Have you designed and implemented hiring and exit procedures?
  - What are the executive leadership and management tone and example?
  - How are personnel who are implementing or directing internal controls evaluated for competency?
    - Are possible threats being identified?
    - Have you put any mitigating plans in place?
    - Do you have a protocol for dealing with incidents and a disaster recovery plan in place?
    - What kind of management supervision and governance do you have in place for your

control the environment and reporting events, security problems, and fraud?

- Have you established a Management Review Committee to discuss ISMS-PIMS specific topics?
- Identify your current security environment posture
  - Do you have access limited to positions that need it, with the appropriateness of the access? given being reviewed on a regular basis?
  - Do you have policies in place for giving and taking away access from workers, customers, and other parties?
  - Do you encrypt data while it's in transit and while it's at rest?
  - Do you impose restrictions on administrative access to the technological stack?
- Identify your current risk mitigation environment posture
  - Have you conducted vulnerability assessments or penetration testing regular basis to detect weaknesses in your environment?
  - Do you have backup processes in place?
  - Do you test your disaster recovery procedures on a yearly basis to guarantee that you can restart operations in case of a calamity?
  - Do you regularly check for intrusion attempts, system performance, and availability?
- Identify your current system changes environment posture
  - Are system modifications tested and authorized before they are implemented?
  - Do you inform your employees about system changes?
  - Are your controls being monitored on a regular basis?
  - Have you enabled notification of settings changes?
  - Is your technology up to date in terms of upgrades?
  - Do you have a system in place for separating development and production tasks?
- Identify your current remote working environment posture
  - Is technology being used uniformly across all employee locations?
  - is time synchronization enabled on all employees workstations and software?
  - Do you provide staff with regular security awareness training, address data privacy in common spaces, use secure connections while working from home, and raise awareness of phishing attempts?
  - Do you use multifactor authentication to get into your company's network and other systems?
  - Have you deployed mobile device management to make sure that mobile devices are encrypted and authenticated?

#### 4 – CONTROL IMPLEMENTATION

- Design the controls to address your gaps
- Implement controls to address your gaps
- Test the controls to ensure that they are operating effectively.

5 – STATEMENT OF APPLICABILITY (SOA)

- Document all your clauses controls in an SOA (ISMS and PIMS)
- Document all your Annex A controls in an SOA (ISMS and PIMS)
- Document any non-applicability (i.e Physical Security)

6- INTERNAL AUDIT

- Identify an internal auditor
- Grant them access to TrustCloud.

7 – AUDIT READY

- Identify the auditor
- Initiate kick-off to set expectations
- Grant them access to TrustCloud.

8 – MAINTENANCE

- Maintain the program to show continuous compliance via TC integrations
- Perform surveillance audit every year