

Statement of Applicability (SoA)		Control	27001	27018	Risk	Legal	Contractual	Best Practice	Implementation	Control Owner
ISO 27001:2022										
A5 Organizational controls										
A5.1	Policies for information Security	Information security policy and topic-specific policies shall be defined, approved by management, published, communicated to and acknowledged by relevant personnel and relevant interested parties, and reviewed at planned intervals and if significant changes occur.	X	X	Y	Y	Y	Y	Full	Security Compliance Manager
A5.2	Information security roles and responsibilities	Information security roles and responsibilities shall be defined and allocated according to the organization needs.	X	X	Y		Y	Y	Full	CISO, Deputy CISO, Security Compliance Manager
A5.3	Segregation of duties	Conflicting duties and conflicting areas of responsibility shall be segregated.	X		Y			Y	Full	CISO, Deputy CISO, Security Compliance Manager, Data Protection Officer
A5.4	Management responsibilities	Management shall require all personnel to apply information security in accordance with the established information security policy, topic-specific policies and procedures of the organization.	X		Y			Y	Full	CISO, Deputy CISO, Security Compliance Manager
A5.5	Contact with authorities	The organization shall establish and maintain contact with relevant authorities.	X			Y	Y	Y	Full	Director GRC, Security Compliance Manager, Data Protection Officer
A5.6	Contact with special interest groups	The organization shall establish and maintain contact with special interest groups or other specialist security forums and professional associations.	X		Y	Y		Y	Full	Director GRC, Security Compliance Manager, Data Protection Officer
A5.7	Threat intelligence	Information relating to information security threats shall be collected and analysed to produce threat intelligence.	X		Y			Y	Full	Security Compliance Manager, Director of Internal SOC, SOC Analyst
A5.8	Information security in project management	Information security shall be integrated into project management.	X		Y			Y	Full	Security Compliance Manager
A5.9	Inventory of information and other associated assets	An inventory of information and other associated assets, including owners, shall be developed and maintained.	X		Y			Y	Full	Security Compliance Manager, Head of IT Business Support
A5.10	Acceptable use of information and other associated assets	Rules for the acceptable use and procedures for handling information and other associated assets shall be identified, documented and implemented.	X		Y			Y	Full	Security Compliance Manager
A5.11	Return of assets	Personnel and other interested parties as appropriate shall return all the organization's assets in their possession upon change or termination of their employment, contract or agreement.	X			Y		Y	Full	Security Compliance Manager, Head of IT Business Support
A5.12	Classification of information	Information shall be classified according to the information security needs of the organization based on confidentiality, integrity, availability and relevant interested party requirements.	X		Y			Y	Full	Security Compliance Manager
A5.13	Labelling of information	An appropriate set of procedures for information labelling shall be developed and implemented in accordance with the information classification scheme adopted by the organization.	X		Y			Y	Full	Security Compliance Manager
A5.14	Information transfer	Information transfer rules, procedures, or agreements shall be in place for all types of transfer facilities within the organization and between the organization and other parties.	X	X	Y			Y	Full	Security Compliance Manager
A5.15	Access control	Rules to control physical and logical access to information and other associated assets shall be established and implemented based on business and information security requirements.	X		Y			Y	Full	Security Compliance Manager, Head of IT Business Support
A5.16	Identity management	The full life cycle of identities shall be managed.	X	X	Y			Y	Full	Security Compliance Manager, Head of Microsoft Infrastructure, Head of IT Business Support
A5.17	Authentication information	Allocation and management of authentication information shall be controlled by a management process, including advising personnel on appropriate handling of authentication information.	X		Y			Y	Full	Security Compliance Manager, Head of Microsoft Infrastructure, Head of IT Business Support
A5.18	Access rights	Access rights to information and other associated assets shall be provisioned, reviewed, modified and removed in accordance with the organization's topic-specific policy on and rules for access control.	X		Y			Y	Full	Information Security Manager

A5.19	Information security in supplier relationships	Processes and procedures shall be defined and implemented to manage the information security risks associated with the use of supplier's products or services.	X		Y		Y	Y	Full	Information Security Manager
A5.20	Addressing information security within supplier agreements	Relevant information security requirements shall be established and agreed with each supplier based on the type of supplier relationship.	X		Y			Y	Full	Information Security Manager
A5.21	Managing information security in the information and communication technology (ICT) supply chain	Processes and procedures shall be defined and implemented to manage the information security risks associated with the ICT products and services supply chain.	X		Y			Y	Full	Information Security Manager
A5.22	Monitoring, review and change management of supplier services	The organization shall regularly monitor, review, evaluate and manage change in supplier information security practices and service delivery	X		Y			Y	Full	Information Security Manager
A5.23	Information security for use of cloud services	Processes for acquisition, use, management and exit from cloud services shall be established in accordance with the organization's information security requirements.	X		Y		Y	Y	Full	Information Security Manager, Security Compliance Manager
A5.24	Information security incident management planning and preparation	The organization shall plan and prepare for managing information security incidents by defining, establishing and communicating information security incident management processes, roles and responsibilities	X	X	Y	Y		Y	Full	Deputy CISO, Director GRC, Security Compliance Manager, Director of Internal SOC
A5.25	Assessment and decision on information security events	The organization shall assess information security events and decide if they are to be categorized as information security incidents.	X		Y			Y	Full	Deputy CISO, Director GRC, Security Compliance Manager, Director of Internal SOC
A5.26	Response to information security incidents	Information security incidents shall be responded to in accordance with the documented procedures	X		Y	Y		Y	Full	Deputy CISO, Director GRC, Security Compliance Manager, Director of Internal SOC
A5.27	Learning from information security incidents	Knowledge gained from information security incidents shall be used to strengthen and improve the information security controls.	X		Y			Y	Full	Deputy CISO, Director GRC, Security Compliance Manager, Director of Internal SOC
A5.28	Collection of evidence	The organization shall establish and implement procedures for the identification, collection, acquisition and preservation of evidence related to information security events.	X		Y	Y		Y	Full	Deputy CISO, VP Internal Security, Director GRC, Security Compliance Manager, Director of Internal SOC
A5.29	Information security during disruption	The organization shall plan how to maintain information security at an appropriate level during disruption.	X		Y			Y	Full	Global CISO, Senior VP, IT&S
A5.30	ICT readiness for business continuity	ICT readiness shall be planned, implemented, maintained and tested based on business continuity objectives and ICT continuity requirements.	X		Y		Y	Y	Full	Global CISO, Senior VP, IT&S
A5.31	Legal, statutory, regulatory and contractual requirements	Legal, statutory, regulatory and contractual requirements relevant to information security and the organization's approach to meet these requirements shall be identified, documented and kept up to date.	X		Y	Y	Y	Y	Full	Security Compliance Manager, General Counsel & Company Secretary, Data Protection Officer
A5.32	Intellectual property rights	The organization shall implement appropriate procedures to protect intellectual property rights.	X			Y		Y	Full	General Counsel & Company Secretary
A5.33	Protection of records	Records shall be protected from loss, destruction, falsification, unauthorized access and unauthorized release.	X		Y			Y	Full	Security Compliance Manager, General Counsel & Company Secretary, Senior VP, IT&S
A5.34	Privacy and protection of personal identifiable information (PII)	The organization shall identify and meet the requirements regarding the preservation of privacy and protection of PII according to applicable laws and regulations and contractual requirements.	X			Y		Y	Full	Data Protection Officer, Security Compliance Manager

A5.35	Independent review of information security	The organization's approach to managing information security and its implementation including people, processes and technologies shall be reviewed independently at planned intervals, or when significant changes occur.	X	X				Y	Full	Security Compliance Manager
A5.36	Compliance with policies, rules and standards for information security	Compliance with the organization's information security policy, topic-specific policies, rules and standards shall be regularly reviewed.	X		Y			Y	Full	Security Compliance Manager
A5.37	Documented operating procedures	Operating procedures for information processing facilities shall be documented and made available to personnel who need them.	X		Y			Y	Full	Security Compliance Manager
<b>A6 People controls</b>										
A6.1	Screening	Background verification checks on all candidates to become personnel shall be carried out prior to joining the organization and on an ongoing basis taking into consideration applicable laws, regulations and ethics and be proportional to the business requirements, the classification of the information to be accessed and the perceived risks.	X		Y		Y	Y	Full	Chief People Officer, Head of People
A6.2	Terms and conditions of employment	The employment contractual agreements shall state the personnel's and the organization's responsibilities for information security.	X		Y	Y		Y	Full	Chief People Officer, Head of People
A6.3	Information security awareness, education and training	Personnel of the organization and relevant interested parties shall receive appropriate information security awareness, education and training and regular updates of the organization's information security policy, topic-specific policies and procedures, as relevant for their job function.	X	X	Y			Y	Full	Security Compliance Manager
A6.4	Disciplinary process	A disciplinary process shall be formalized and communicated to take actions against personnel and other relevant interested parties who have committed an information security policy violation.	X					Y	Full	Chief People Officer, Head of People
A6.5	Responsibilities after termination or change of employment	Information security responsibilities and duties that remain valid after termination or change of employment shall be defined, enforced and communicated to relevant personnel and other interested parties.	X		Y		Y	Y	Full	Chief People Officer, Head of People
A6.6	Confidentiality or non-disclosure agreements	Confidentiality or non-disclosure agreements reflecting the organization's needs for the protection of information shall be identified, documented, regularly reviewed and signed by personnel and other relevant interested parties.	X		Y			Y	Full	Chief People Officer, Head of People
A6.7	Remote working	Security measures shall be implemented when personnel are working remotely to protect information accessed, processed or stored outside the organization's premises.	X		Y			Y	Full	Security Compliance Manager, Chief People Officer, Head of People
A6.8	Information security event reporting	The organization shall provide a mechanism for personnel to report observed or suspected information security events through appropriate channels in a timely manner.	X		Y			Y	Full	Deputy CISO, VP Internal Security, Director GRC, Security Compliance Manager, Director of Internal SOC
<b>A7 Physical controls</b>										
A7.1	Physical security perimeters	Security perimeters shall be defined and used to protect areas that contain information and other associated assets.	X		Y			Y	Full	Global Head of Physical Security
A7.2	Physical entry	Secure areas shall be protected by appropriate entry controls and access points.	X		Y			Y	Full	Global Head of Physical Security
A7.3	Securing offices, rooms and facilities	Physical security for offices, rooms and facilities shall be designed and implemented.	X		Y			Y	Full	Global Head of Physical Security
A7.4	Physical security monitoring	Premises shall be continuously monitored for unauthorized physical access.	X		Y			Y	Full	Global Head of Physical Security
A7.5	Protecting against physical and environmental threats	Protection against physical and environmental threats, such as natural disasters and other intentional or unintentional physical threats to infrastructure shall be designed and implemented.	X		Y			Y	Full	Global Head of Physical Security
A7.6	Working in secure areas	Security measures for working in secure areas shall be designed and implemented.	X		Y			Y	Full	Global Head of Physical Security
A7.7	Clear desk and clear screen	Clear desk rules for papers and removable storage media and clear screen rules for information processing facilities shall be defined and appropriately enforced.	X		Y			Y	Full	Global Head of Physical Security, Security Compliance Manager
A7.8	Equipment siting and protection	Equipment shall be sited securely and protected.	X		Y			Y	Full	Global Head of Physical Security

A7.9	Security of assets off-premises	Off-site assets shall be protected.	X		Y		Y	Full	Global Head of Physical Security
A7.10	Storage media	Storage media shall be managed through their life cycle of acquisition, use, transportation and disposal in accordance with the organization's classification scheme and handling requirements.	X		Y		Y	Full	Global Head of Physical Security, Senior VP, IT&S
A7.11	Supporting utilities	Information processing facilities shall be protected from power failures and other disruptions caused by failures in supporting utilities.	X		Y		Y	Full	Global Head of Physical Security
A7.12	Cabling security	Cables carrying power, data or supporting information services shall be protected from interception, interference or damage.	X		Y		Y	Full	Global Head of Physical Security
A7.13	Equipment maintenance	Equipment shall be maintained correctly to ensure availability, integrity and confidentiality of information.	X		Y		Y	Full	Global Head of Physical Security
A7.14	Secure disposal or re-use of equipment	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.	X		Y	Y	Y	Full	Global Head of Physical Security, Security Compliance Manager
<b>A8 Technological controls</b>									
A8.1	User end point devices	Information stored on, processed by or accessible via user end point devices shall be protected.	X		Y		Y	Full	Senior VP, IT&S, Security Compliance Manager
A8.2	Privileged access rights	The allocation and use of privileged access rights shall be restricted and managed.	X		Y		Y	Full	Senior VP, IT&S, Security Compliance Manager
A8.3	Information access restriction	Access to information and other associated assets shall be restricted in accordance with the established topic-specific policy on access control.	X		Y		Y	Full	Senior VP, IT&S, Security Compliance Manager
A8.4	Access to source code	Read and write access to source code, development tools and software libraries shall be appropriately managed.	X		Y		Y	Full	Chief Technology Officer, Security Compliance Manager
A8.5	Secure authentication	Secure authentication technologies and procedures shall be implemented based on information access restrictions and the topic-specific policy on access control.	X	X	Y		Y	Full	Senior VP, IT&S, Security Compliance Manager
A8.6	Capacity management	The use of resources shall be monitored and adjusted in line with current and expected capacity requirements.	X				Y	Full	Head of Network Infrastructure, Security Compliance Manager
A8.7	Protection against malware	Protection against malware shall be implemented and supported by appropriate user awareness.	X		Y		Y	Full	Senior VP, IT&S, Director of Internal SOC, Security Compliance Manager
A8.8	Management of technical vulnerabilities	Information about technical vulnerabilities of information systems in use shall be obtained, the organization's exposure to such vulnerabilities shall be evaluated and appropriate measures shall be taken.	X		Y		Y	Full	VP of Technical Security, Director of Internal SOC, Security Compliance Manager
A8.9	Configuration management	Configurations, including security configurations, of hardware, software, services and networks shall be established, documented, implemented, monitored and reviewed.	X		Y		Y	Full	Security Compliance Manager, Director of IT Operations (SaaS & Endpoints)
A8.10	Information deletion	Information stored in information systems, devices or in any other storage media shall be deleted when no longer required.	X		Y	Y	Y	Full	Security Compliance Manager, Senior VP, IT&S
A8.11	Data masking	Data masking shall be used in accordance with the organization's topic-specific policy on access control and other related topic-specific policies, and business requirements, taking applicable legislation into consideration.	X		Y		Y	Full	Security Compliance Manager
A8.12	Data leakage prevention	Data leakage prevention measures shall be applied to systems, networks and any other devices that process, store or transmit sensitive information.	X		Y		Y	Full	Senior VP, IT&S, Global CISO, Director of Internal SOC
A8.13	Information backup	Backup copies of information, software and systems shall be maintained and regularly tested in accordance with the agreed topic-specific policy on backup.	X		Y	Y	Y	Full	Senior VP, IT&S
A8.14	Redundancy of information processing facilities	Information processing facilities shall be implemented with redundancy sufficient to meet availability requirements.	X		Y	Y	Y	Full	Senior VP, IT&S
A8.15	Logging	Logs that record activities, exceptions, faults and other relevant events shall be produced, stored, protected and analysed.	X		Y		Y	Full	Senior VP, IT&S, Director of Internal SOC
A8.16	Monitoring activities	Networks, systems and applications shall be monitored for anomalous behaviour and appropriate actions taken to evaluate potential information security incidents.	X		Y		Y	Full	Director of Internal SOC
A8.17	Clock synchronization	The clocks of information processing systems used by the organization shall be synchronized to approved time sources.	X		Y		Y	Full	Senior VP, IT&S
A8.18	Use of privileged utility programs	The use of utility programs that can be capable of overriding system and application controls shall be restricted and tightly controlled.	X		Y		Y	Full	Information Security Manager, Senior VP, IT&S
A8.19	Installation of software on operational systems	Procedures and measures shall be implemented to securely manage software installation on operational systems.	X		Y		Y	Full	Information Security Manager, Senior VP, IT&S
A8.20	Networks security	Networks and network devices shall be secured, managed and controlled to protect information in systems and applications.	X		Y		Y	Full	Head of Network Infrastructure
A8.21	Security of network services	Security mechanisms, service levels and service requirements of network services shall be identified, implemented and monitored.	X		Y		Y	Full	Head of Network Infrastructure, Director of Internal SOC
A8.22	Segregation of networks	Groups of information services, users and information systems shall be segregated in the organization's networks.	X		Y		Y	Full	Head of Network Infrastructure

A8.23	Web filtering	Access to external websites shall be managed to reduce exposure to malicious content.	X		Y			Y	Full	Director of Internal SOC
A8.24	Use of cryptography	Rules for the effective use of cryptography, including cryptographic key management, shall be defined and implemented.	X		Y		Y	Y	Full	Security Compliance Manager, Senior VP, IT&S
A8.25	Secure development life cycle	Rules for the secure development of software and systems shall be established and applied.	X		Y			Y	Full	Chief Technology Officer
A8.26	Application security requirements	Information security requirements shall be identified, specified and approved when developing or acquiring applications.	X		Y			Y	Full	Security Compliance Manager
A8.27	Secure system architecture and engineering principles	Principles for engineering secure systems shall be established, documented, maintained and applied to any information system development activities.	X		Y			Y	Full	Chief Technology Officer, Senior VP, IT&S, DevSecOps Lead
A8.28	Secure coding	Secure coding principles shall be applied to software development.	X		Y			Y	Full	Chief Technology Officer, DevSecOps Lead
A8.29	Security testing in development and acceptance	Security testing processes shall be defined and implemented in the development life cycle.	X		Y			Y	Full	VP of Technical Security Operations, Security Compliance Manager
A8.30	Outsourced development	The organization shall direct, monitor and review the activities related to outsourced system development.	EXCLUDED: No development is outsourced.							
A8.31	Separation of development, test and production environments	Development, testing and production environments shall be separated and secured.	X		Y			Y	Full	Chief Technology Officer, Senior VP, IT&S, DevSecOps Lead
A8.32	Change management	Changes to information processing facilities and information systems shall be subject to change management procedures.	X		Y			Y	Full	Senior VP, IT&S, Security Compliance Manager, Chief Technology Officer
A8.33	Test information	Test information shall be appropriately selected, protected and managed.	X	X	Y		Y	Y	Full	Security Compliance Manager
A8.34	Protection of information systems during audit testing	Audit tests and other assurance activities involving assessment of operational systems shall be planned and agreed between the tester and appropriate management.	X		Y			Y	Full	Security Compliance Manager, VP of Technical Security Operations

## ISO 27018:2019

### A2 Consent and choice

A.2.1	Obligation to co-operate regarding PII principals' rights	The public cloud PII processor should provide the cloud service customer with the means to enable them to fulfil their obligation to facilitate the exercise of PII principals' rights to access, correct and/or erase PII pertaining to them.		X		Y	Y	Y	Full	Associate General Counsel, Data Protection Officer
-------	---	--	--	---	--	---	---	---	------	--

### A3 Purpose legitimacy and specification

A.3.1	Public cloud PII processor's purpose	PII to be processed under a contract should not be processed for any purpose independent of the instructions of the cloud service customer.		X		Y	Y	Y	Full	Associate General Counsel, Data Protection Officer
A.3.2	Public cloud PII processor's commercial use	PII processed under a contract should not be used by the public cloud PII processor for the purposes of marketing and advertising without express consent. Such consent should not be a condition of receiving the service.		X		Y		Y	Full	Associate General Counsel, Data Protection Officer

### A4 Collection limitation

No additional controls are relevant to this privacy principle.										
--	--	--	--	--	--	--	--	--	--	--

### A5 Data minimization

A.5.1	Secure erasure of temporary files	Temporary files and documents should be erased or destroyed within a specified, documented period.		X		Y	Y	Y	Full	Security Compliance Manager
-------	-----------------------------------	--	--	---	--	---	---	---	------	-----------------------------

### A6 Use, retention and disclosure limitation

A.6.1	PII disclosure notification	The contract between the public cloud PII processor and the cloud service customer should require the public cloud PII processor to notify the cloud service customer, in accordance with any procedure and time periods agreed in the contract, of any legally binding request for disclosure of PII by a law enforcement authority, unless such a disclosure is otherwise prohibited.		X		Y	Y	Y	Full	Associate General Counsel, Data Protection Officer
A.6.2	Recording of PII disclosures	Disclosures of PII to third parties should be recorded, including what PII has been disclosed, to whom and at what time.		X		Y	Y	Y	Full	Associate General Counsel, Data Protection Officer

### A7 Accuracy and quality

No additional controls are relevant to this privacy principle.										
--	--	--	--	--	--	--	--	--	--	--

### A8 Openness, transparency and notice

A.8.1	Disclosure of sub-contracted PII processing	The use of sub-contractors by the public cloud PII processor to process PII should be disclosed to the relevant cloud service customers before their use.		X		Y	Y	Y	Full	Associate General Counsel, Data Protection Officer
-------	---	---	--	---	--	---	---	---	------	--

A9 Individual participation and access										
No additional controls are relevant to this privacy principle.										
A10 Accountability										
A.10.1	Notification of a data breach involving PII	The public cloud PII processor should promptly notify the relevant cloud service customer in the event of any unauthorized access to PII or unauthorized access to processing equipment or facilities resulting in loss, disclosure or alteration of PII.		X		Y	Y	Y	Full	Associate General Counsel, Data Protection Officer
A.10.2	Retention period for administrative security policies and guidelines	Copies of security policies and operating procedures should be retained for a specified, documented period on replacement (including updating).		X		Y	Y	Y	Full	Security Compliance Manager
A.10.3	PII return, transfer and disposal	The public cloud PII processor should have a policy in respect of the return, transfer and/or disposal of PII and should make this policy available to the cloud service customer.		X		Y	Y	Y	Full	Associate General Counsel, Data Protection Officer
A11 Information security										
A.11.1	Confidentiality or non-disclosure agreements	Individuals under the public cloud PII processor's control with access to PII should be subject to a confidentiality obligation.		X		Y	Y	Y	Full	Associate General Counsel, Data Protection Officer
A.11.2	Restriction of the creation of hardcopy material	The creation of hardcopy material displaying PII should be restricted.		X	Y	Y		Y	Full	Security Compliance Manager
A.11.3	Control and logging of data restoration	There should be a procedure for, and a log of, data restoration efforts.		X	Y	Y	Y	Y	Full	Security Compliance Manager
A.11.4	Protecting data on storage media leaving the premises	PII on media leaving the organization's premises should be subject to an authorization procedure and should not be accessible to anyone other than authorized personnel (e.g. by encrypting the data concerned).		X	Y	Y	Y	Y	Full	Security Compliance Manager
A.11.5	Use of unencrypted portable storage media and devices	Portable physical media and portable devices that do not permit encryption should not be used except where it is unavoidable, and any use of such portable media and devices should be documented.		X		Y	Y	Y	Full	Security Compliance Manager
A.11.6	Encryption of PII transmitted over public data-transmission networks	PII that is transmitted over public data-transmission networks should be encrypted prior to transmission.		X		Y	Y	Y	Full	Security Compliance Manager
A.11.7	Secure disposal of hardcopy materials	Where hardcopy materials are destroyed, they should be destroyed securely using mechanisms such as cross-cutting, shredding, incinerating, pulping, etc.		X	Y	Y	Y	Y	Full	Security Compliance Manager
A.11.8	Unique use of user IDs	If more than one individual has access to stored PII, then they should each have a distinct user ID for identification, authentication and authorization purposes.		X	Y	Y	Y	Y	Full	Security Compliance Manager
A.11.9	Records of authorized users	An up-to-date record of the users or profiles of users who have authorized access to the information system should be maintained.		X		Y	Y	Y	Full	Security Compliance Manager
A.11.10	User ID management	De-activated or expired user IDs should not be granted to other individuals.		X	Y	Y	Y	Y	Full	Security Compliance Manager
A.11.11	Contract measures	Contracts between the cloud service customer and the public cloud PII processor should specify minimum technical and organizational measures to ensure that the contracted security arrangements are in place and that data are not processed for any purpose independent of the instructions of the controller. Such measures should not be subject to unilateral reduction by the public cloud PII processor.		X		Y	Y	Y	Full	Associate General Counsel, Data Protection Officer
A.11.12	Sub-contracted PII processing	Contracts between the public cloud PII processor and any sub-contractors that process PII should specify minimum technical and organizational measures that meet the information security and PII protection obligations of the public cloud PII processor. Such measures should not be subject to unilateral reduction by the sub-contractor.		X		Y	Y	Y	Full	Associate General Counsel, Data Protection Officer
A.11.13	Access to data on pre-used data storage space	The public cloud PII processor should ensure that whenever data storage space is assigned to a cloud service customer, any data previously residing on that storage space is not visible to that cloud service customer.		X		Y	Y	Y	Full	Security Compliance Manager

A12 Privacy compliance										
A.12.1	Geographical location of PII	The public cloud PII processor should specify and document the countries in which PII can possibly be stored.		X		Y	Y	Y	Full	Associate General Counsel, Data Protection Officer
A.12.2	Intended destination of PII	PII transmitted using a data-transmission network should be subject to appropriate controls designed to ensure that data reaches its intended destination.		X		Y	Y	Y	Full	Associate General Counsel, Data Protection Officer