


CAIQ TM CONSENSUS ASSESSMENTS INITIATIVE QUESTIONNAIRE v4.0.2											
Question ID	Question	CSP CAIQ Answer	SSRM Control Ownership	CSP Implementation Description (Optional/Recommended)	CSC Responsibilities (Optional/Recommended)			CCM Control ID	CCM Control Specification	CCM Control Title	CCM Domain Title
A&A-01.1	Are audit and assurance policies, procedures, and standards established, documented, approved, communicated, applied, evaluated, and maintained?	Yes	CSP-owned	Novisto maintains and implements internal and external audit plans that are performed annually to test the efficiency and effectiveness of security controls against recognized standards such as AICPA Trust Services Criteria (SOC2), and soon NIST 800- 53 and ISO/IEC 27001				A&A-01	Establish, document, approve, communicate, apply, evaluate and maintain audit and assurance policies and procedures and standards. Review and update the policies and procedures at least annually.	Audit and Assurance Policy and Procedures	Audit & Assurance
A&A-01.2	Are audit and assurance policies, procedures, and standards reviewed and updated at least annually?	Yes	CSP-owned	Novisto reviews and updates all its policies and procedures annually							
A&A-02.1	Are independent audit and assurance assessments conducted according to relevant standards at least annually?	Yes	CSP-owned	Novisto conducts independent audits and assurance assessments on an annual basis to determine if its GRC framework and ISMS are operating according to the design.				A&A-02	Conduct independent audit and assurance assessments according to relevant standards at least annually.	Independent Assessments	
A&A-03.1	Are independent audit and assurance assessments performed according to risk-based plans and policies?	Yes	CSP-owned	Novisto's independent audit and assurance assessments are performed according to the risk environment across the organization				A&A-03	Perform independent audit and assurance assessments according to risk-based plans and policies.	Risk Based Planning Assessment	
A&A-04.1	Is compliance verified regarding all relevant standards, regulations, legal/contractual, and statutory requirements applicable to the audit?	Yes	CSP-owned	Novisto maintains and implements internal and external audit plans that are performed annually to test the efficiency and effectiveness of security controls against recognized standards such as AICPA Trust Services Criteria (SOC2), and soon NIST 800- 53 and ISO/IEC 27001				A&A-04	Verify compliance with all relevant standards, regulations, legal/contractual, and statutory requirements applicable to the audit.	Requirements Compliance	
A&A-05.1	Is an audit management process defined and implemented to support audit planning, risk analysis, security control assessments, conclusions, remediation schedules, report generation, and reviews of past reports and supporting evidence?	Yes	CSP-owned	Novisto implements and maintains annual internal and external audit plans which include risk analysis, security control assessments, conclusions, remediation schedules, report generation, and reviews of past reports.				A&A-05	Define and implement an Audit Management process to support audit planning, risk analysis, security control assessment, conclusion, remediation schedules, report generation, and review of past reports and supporting evidence.	Audit Management Process	
A&A-06.1	Is a risk-based corrective action plan to remediate audit findings established, documented, approved, communicated, applied, evaluated, and maintained?	Yes	CSP-owned	Novisto establishes action plans to remediate audit findings, those plans are registered, documented, approved, communicated, applied, evaluated and maintained.				A&A-06	Establish, document, approve, communicate, apply, evaluate and maintain a risk-based corrective action plan to remediate audit findings, review and report remediation status to relevant stakeholders.	Remediation	Application & Interface Security
AIS-01.1	Are application security policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained to guide appropriate planning, delivery, and support of the organization's application security capabilities?	Yes	CSP-owned	Novisto has policies and procedures that support the system development lifecycle.				AIS-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for application security to provide guidance to the appropriate planning, delivery and support of the organization's application security capabilities. Review and update the policies and procedures at least annually.	Application and Interface Security Policy and Procedures	
AIS-01.2	Are application security policies and procedures reviewed and updated at least annually?	Yes	CSP-owned	Novisto reviews and updates all its policies and procedures annually							
AIS-02.1	Are baseline requirements to secure different applications established, documented, and maintained?	Yes	CSP-owned	Novisto has policies and procedures for devices, infrastructure and software. It outlines the baseline requirements for devices and applications deployed within the organization				AIS-02	Establish, document and maintain baseline requirements for securing different applications.	Application Security Baseline Requirements	
AIS-03.1	Are technical and operational metrics defined and implemented according to business objectives, security requirements, and compliance obligations?	Yes	CSP-owned	Novisto has established metrics, thresholds and alarms according to business objectives, security requirements and compliance obligations				AIS-03	Define and implement technical and operational metrics in alignment with business objectives, security requirements, and compliance obligations.	Application Security Metrics	
AIS-04.1	Is an SDLC process defined and implemented for application design, development, deployment, and operation per organizationally designed security requirements?	Yes	CSP-owned	Novisto has a defined, implemented and monitored SDLC process				AIS-04	Define and implement a SDLC process for application design, development, deployment, and operation in accordance with security requirements defined by the organization.	Secure Application Design and Development	
AIS-05.1	Does the testing strategy outline criteria to accept new information systems, upgrades, and new versions while ensuring application security, compliance adherence, and organizational speed of delivery goals?	Yes	CSP-owned	Novisto performs automatic static and dynamic analysis, as well as functional and performance tests before new releases.				AIS-05	Implement a testing strategy, including criteria for acceptance of new information systems, upgrades and new versions, which provides application security assurance and maintains compliance while enabling organizational speed of delivery goals. Automate when applicable and possible.	Automated Application Security Testing	
AIS-05.2	Is testing automated when applicable and possible?	Yes	CSP-owned	Novisto performs automatic static and dynamic analysis, as well as functional and performance tests before new releases.							
AIS-06.1	Are strategies and capabilities established and implemented to deploy application code in a secure, standardized, and compliant manner?	Yes	CSP-owned	Novisto has a defined, implemented and monitored SDLC process that includes security and compliant requirements				AIS-06	Establish and implement strategies and capabilities for secure, standardized, and compliant application deployment. Automate where possible.	Automated Secure Application Deployment	
AIS-06.2	Is the deployment and integration of application code automated where possible?	Yes	CSP-owned	Novisto's SDLC includes version control, including testing strategy. Deployments are automated and include appropriate levels of validation and approval.							
AIS-07.1	Are application security vulnerabilities remediated following defined processes?	Yes	CSP-owned	Application security patches are applied following the SDLC and change management procedures.							
AIS-07.2	Is the remediation of application security vulnerabilities automated when possible?	Yes	CSP-owned	Yes, as part of Novisto SDLC				AIS-07	Define and implement a process to remediate application security vulnerabilities, automating remediation when possible.	Application Vulnerability Remediation	
BCR-01.1	Are business continuity management and operational resilience policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained?	Yes	CSP-owned	Novisto has business continuity and disaster recovery plans that are tested at least once a year				BCR-01	Establish, document, approve, communicate, apply, evaluate and maintain business continuity management and operational resilience policies and procedures. Review and update the policies and procedures at least annually.	Business Continuity Management Policy and Procedures	Business Continuity
BCR-01.2	Are the policies and procedures reviewed and updated at least annually?	Yes	CSP-owned	Novisto has business continuity and disaster recovery plans (BCP/DRP) that are tested at least once a year							
BCR-02.1	Are criteria for developing business continuity and operational resiliency strategies and capabilities established based on business disruption and risk impacts?	Yes	CSP-owned	Resilience strategies and disaster recovery plans are developed according business disruptions and impacts				BCR-02	Determine the impact of business disruptions and risks to establish criteria for developing business continuity and operational resilience strategies and capabilities.	Risk Assessment and Impact Analysis	
BCR-03.1	Are strategies developed to reduce the impact of, withstand, and recover from business disruptions in accordance with risk appetite?	Yes	CSP-owned	Novisto DRP and BCP include the strategies developed to reduce the impact of disruption of service, and quick recovery of operations according to SLA				BCR-03	Establish strategies to reduce the impact of, withstand, and recover from business disruptions within risk appetite.	Business Continuity Strategy	
BCR-04.1	Are operational resilience strategies and capability results incorporated to establish, document, approve, communicate, apply, evaluate, and maintain a business continuity plan?	Yes	CSP-owned	Resiliency strategies and capabilities are tested and adjusted in disaster simulations and included in our formal recovery plans				BCR-04	Establish, document, approve, communicate, apply, evaluate and maintain a business continuity plan based on the results of the operational resilience strategies and capabilities.	Business Continuity Planning	


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BCR-05.1	Is relevant documentation developed, identified, and acquired to support business continuity and operational resilience plans?	Yes	CSP-owned	Novisto has a formal BCP/DRP that is evaluated in our SOC2 audit				BCR-05	Develop, identify, and acquire documentation that is relevant to support the business continuity and operational resilience programs. Make the documentation available to authorized stakeholders and review periodically.	Documentation	Business Continuity Management and Operational Resilience
BCR-05.2	Is business continuity and operational resilience documentation available to authorized stakeholders?	Yes	CSP-owned	BCP/DRP documentation is available to all involved personnel and authorized stakeholders							
BCR-05.3	Is business continuity and operational resilience documentation reviewed periodically?	Yes	CSP-owned	All policies and procedures are reviewed at least once a year							
BCR-06.1	Are the business continuity and operational resilience plans exercised and tested at least annually and when significant changes occur?	Yes	CSP-owned	BCP/DRP are tested at least once a year and when significant changes occurred				BCR-06	Exercise and test business continuity and operational resilience plans at least annually or upon significant changes.	Business Continuity Exercises	
BCR-07.1	Do business continuity and resilience procedures establish communication with stakeholders and participants?	Yes	CSP-owned	All communication requirements and procedures are included in BCP/DRP				BCR-07	Establish communication with stakeholders and participants in the course of business continuity and resilience procedures.	Communication	
BCR-08.1	Is cloud data periodically backed up?	Yes	CSP-owned	Backup is performed daily							
BCR-08.2	Is the confidentiality, integrity, and availability of backup data ensured?	Yes	CSP-owned	Novisto protects Backup data as production, ensuring appropriate levels of confidentiality, integrity and availability				BCR-08	Periodically backup data stored in the cloud. Ensure the confidentiality, integrity and availability of the backup, and verify data restoration from backup for resiliency.	Backup	
BCR-08.3	Can backups be restored appropriately for resiliency?	Yes	CSP-owned	Backups are stored in Azure Blob services, that replicate them in multiple geographic locations. Test restoring procedures are performed periodically							
BCR-09.1	Is a disaster response plan established, documented, approved, applied, evaluated, and maintained to ensure recovery from natural and man-made disasters?	Yes	CSP-owned	Novisto has business continuity and disaster recovery plans (BCP/DRP) that are tested at least once a year. Natural and man-made disasters are included				BCR-09	Establish, document, approve, communicate, apply, evaluate and maintain a disaster response plan to recover from natural and man-made disasters. Update the plan at least annually or upon significant changes.	Disaster Response Plan	
BCR-09.2	Is the disaster response plan updated at least annually, and when significant changes occur?	Yes	CSP-owned	All policies and procedures are reviewed at least once a year, including BCP/DRP							
BCR-10.1	Is the disaster response plan exercised annually or when significant changes occur?	Yes	CSP-owned	DRP/BCP are tested at least once a year				BCR-10	Exercise the disaster response plan annually or upon significant changes, including if possible local emergency authorities.	Response Plan Exercise	Change Control and Configuration Management
BCR-10.2	Are local emergency authorities included, if possible, in the exercise?	No	CSP-owned	Exercises are performed by internal teams that will communicate with emergency services if necessary							
BCR-11.1	Is business-critical equipment supplemented with redundant equipment independently located at a reasonable minimum distance in accordance with applicable industry standards?	No	CSP-owned	Novisto does not deploy the application using a multi-site configuration but maintains a Business Continuity and Disaster Recovery process, tested regularly, which allows restoring the application in the event of a disruption, including a full region being down, with 24h RTO and RPO				BCR-11	Supplement business-critical equipment with redundant equipment independently located at a reasonable minimum distance in accordance with applicable industry standards.	Equipment Redundancy	
CCC-01.1	Are risk management policies and procedures associated with changing organizational assets including applications, systems, infrastructure, configuration, etc., established, documented, approved, communicated, applied, evaluated and maintained (regardless of whether asset management is internal or external)?	Yes	CSP-owned	Novisto has established change management policies and procedures which integrate risk management and change management processes. Changes have to be documented, evaluated, communicated, tested, and approved before application.				CCC-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for managing the risks associated with applying changes to organization assets, including application, systems, infrastructure, configuration, etc., regardless of whether the assets are managed internally or externally (i.e., outsourced). Review and update the policies and procedures at least annually.	Change Management Policy and Procedures	
CCC-01.2	Are the policies and procedures reviewed and updated at least annually?	Yes	CSP-owned	All policies and procedures are reviewed at least once a year, including change management							
CCC-02.1	Is a defined quality change control, approval and testing process (with established baselines, testing, and release standards) followed?	Yes	CSP-owned	Novisto has established change management policies and procedures which integrate risk management and change management processes. Changes have to be documented, evaluated, communicated, tested, and approved before application.				CCC-02	Follow a defined quality change control, approval and testing process with established baselines, testing, and release standards.	Quality Testing	
CCC-03.1	Are risks associated with changing organizational assets (including applications, systems, infrastructure, configuration, etc.) managed, regardless of whether asset management occurs internally or externally (i.e., outsourced)?	Yes	CSP-owned	Risk evaluation is included in change management				CCC-03	Manage the risks associated with applying changes to organization assets, including application, systems, infrastructure, configuration, etc., regardless of whether the assets are managed internally or externally (i.e., outsourced).	Change Management Technology	
CCC-04.1	Is the unauthorized addition, removal, update, and management of organization assets restricted?	Yes	CSP-owned	Access to organization assets is restricted to required personnel, addition, removal, update and management of assets is performed under change control procedures				CCC-04	Restrict the unauthorized addition, removal, update, and management of organization assets.	Unauthorized Change Protection	
CCC-05.1	Are provisions to limit changes that directly impact CSC-owned environments and require tenants to authorize requests explicitly included within the service level agreements (SLAs) between CSPs and CSCs?	Yes	CSP-owned	All changes that potentially would affect CSCs are programmed out of business hours, taking care of not affecting the SLAs				CCC-05	Include provisions limiting changes directly impacting CSCs owned environments/tenants to explicitly authorized requests within service level agreements between CSPs and CSCs.	Change Agreements	
CCC-06.1	Are change management baselines established for all relevant authorized changes on organizational assets?	Yes	CSP-owned	All changes are performed according established baselines				CCC-06	Establish change management baselines for all relevant authorized changes on organization assets.	Change Management Baseline	Encryption and Key Management Policy and Procedures
CCC-07.1	Are detection measures implemented with proactive notification if changes deviate from established baselines?	Yes	CSP-owned	Novisto performs continuous monitoring of configuration for software and infrastructure and collects and protects audit logs				CCC-07	Implement detection measures with proactive notification in case of changes deviating from the established baseline.	Detection of Baseline Deviation	
CCC-08.1	Is a procedure implemented to manage exceptions, including emergencies, in the change and configuration process?	Yes	CSP-owned	Novisto included the management of emergency and exceptions in its change control procedures				CCC-08	'Implement a procedure for the management of exceptions, including emergencies, in the change and configuration process. Align the procedure with the requirements of GRC-04: Policy Exception Process.'	Exception Management	
CCC-08.2	Is the procedure aligned with the requirements of the GRC-04: Policy Exception Process?	Yes	CSP-owned	Novisto included exception management in its policies							
CCC-09.1	Is a process to proactively roll back changes to a previously known "good state" defined and implemented in case of errors or security concerns?	Yes	CSP-owned	Novisto has processes to roll back changes or mitigate the impact in case the changes have an adverse impact on the service				CCC-09	Define and implement a process to proactively roll back changes to a previous known good state in case of errors or security concerns.	Change Restoration	
CEK-01.1	Are cryptography, encryption, and key management policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained?	Yes	CSP-owned	Novisto has formal policies and procedures to manage cryptography, encryption and key management.				CEK-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for Cryptography, Encryption and Key Management. Review and update the policies and procedures at least annually.	Encryption and Key Management Policy and Procedures	
CEK-01.2	Are cryptography, encryption, and key management policies and procedures reviewed and updated at least annually?	Yes	CSP-owned	Novisto review all procedures and policies at least once a year							

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CEK-02.i	Are cryptography, encryption, and key management roles and responsibilities defined and implemented?	Yes	CSP-owned	Novisto has policies and procedures to manage cryptography, encryption, and key management. Policies include roles and responsibilities. Novisto cryptographic operation is supported by Azure services				CEK-02	Define and implement cryptographic, encryption and key management roles and responsibilities.	CEK Roles and Responsibilities	Cryptography, Encryption & Key Management
CEK-03.i	Are data at-rest and in-transit cryptographically protected using cryptographic libraries certified to approved standards?	Yes	CSP-owned	At Novisto, encryption of confidential and sensitive data is mandatory. Novisto cryptographic operations are supported in Azure Services, which use industry-accepted encryption keys and protocols. Data at rest: devices and storage (objects and databases) and data transfer is encrypted.				CEK-03	Provide cryptographic protection to data at-rest and in-transit, using cryptographic libraries certified to approved standards.	Data Encryption	
CEK-04.i	Are appropriate data protection encryption algorithms used that consider data classification, associated risks, and encryption technology usability?	Yes	CSP-owned	At Novisto, encryption of confidential and sensitive data is mandatory. Nostlo cryptographic operations are supported in Azure Services, which use industry-accepted encryption keys and protocols. Data at rest: devices and storage (objects and databases) and data transfer is encrypted.				CEK-04	Use encryption algorithms that are appropriate for data protection, considering the classification of data, associated risks, and usability of the encryption technology.	Encryption Algorithm	
CEK-05.i	Are standard change management procedures established to review, approve, implement and communicate cryptography, encryption, and key management technology changes that accommodate internal and external sources?	Yes	CSP-owned	Novisto change management procedures include cryptographic and key management process				CEK-05	Establish a standard change management procedure, to accommodate changes from internal and external sources, for review, approval, implementation and communication of cryptographic, encryption and key management technology changes.	Encryption Change Management	
CEK-06.i	Are changes to cryptography-, encryption- and key management-related systems, policies, and procedures, managed and adopted in a manner that fully accounts for downstream effects of proposed changes, including residual risk, cost, and benefits analysis?	Yes	CSP-owned	Novisto change management procedures include cryptographic and key management process				CEK-06	Manage and adopt changes to cryptography-, encryption-, and key management-related systems (including policies and procedures) that fully account for downstream effects of proposed changes, including residual risk, cost, and benefits analysis.	Encryption Change Cost Benefit Analysis	
CEK-07.i	Is a cryptography, encryption, and key management risk program established and maintained that includes risk assessment, risk treatment, risk context, monitoring, and feedback provisions?	Yes	CSP-owned	Novisto risk management procedures includes cryptography and related process				CEK-07	Establish and maintain an encryption and key management risk program that includes provisions for risk assessment, risk treatment, risk context, monitoring, and feedback.	Encryption Risk Management	
CEK-08.i	Are CSPs providing CSCs with the capacity to manage their own data encryption keys?	No	CSP-owned	Novisto uses Azure services to manage the encryption keys, all deployments are performed with Infrastructure as Code, without human interaction. Databases are encrypted by default at Azure, and encryption keys are assigned automatically at Blob storage at creation time				CEK-08	CSPs must provide the capability for CSCs to manage their own data encryption keys.	CSC Key Management Capability	
CEK-09.i	Are encryption and key management systems, policies, and processes audited with a frequency proportional to the system's risk exposure, and after any security event?	Yes	CSP-owned	Audits, including encryption and key management are performed at least once a year as part of SOC2 certification				CEK-09	Audit encryption and key management systems, policies, and processes with a frequency that is proportional to the risk exposure of the system with audit occurring preferably continuously but at least annually and after any security event(s).	Encryption and Key Management Audit	
CEK-09.2	Are encryption and key management systems, policies, and processes audited (preferably continuously but at least annually)?	Yes	CSP-owned	Audits, including encryption and key management, are performed at least once a year as part of the SOC2 certification							
CEK-10.i	Are cryptographic keys generated using industry-accepted and approved cryptographic libraries that specify algorithm strength and random number generator specifications?	Yes	CSP-owned	Novisto uses Azure services to manage the encryption keys, all deployments are performed with Infrastructure as Code, without human interaction				CEK-10	Generate Cryptographic keys using industry accepted cryptographic libraries specifying the algorithm strength and the random number generator used.	Key Generation	
CEK-11.i	Are private keys provisioned for a unique purpose managed, and is cryptography secret?	Yes	CSP-owned	Private keys are provisioned for specific purposes and are maintained secure using Azure services				CEK-11	Manage cryptographic secret and private keys that are provisioned for a unique purpose.	Key Purpose	
CEK-12.i	Are cryptographic keys rotated based on a cryptoperiod calculated while considering information disclosure risks and legal and regulatory requirements?	Yes	CSP-owned	Cryptographic key rotation is managed automatically in Azure according risk, legal and regulatory requirements				CEK-12	Rotate cryptographic keys in accordance with the calculated cryptoperiod, which includes provisions for considering the risk of information disclosure and legal and regulatory requirements.	Key Rotation	
CEK-13.i	Are cryptographic keys revoked and removed before the end of the established cryptoperiod (when a key is compromised, or an entity is no longer part of the organization) per defined, implemented, and evaluated processes, procedures, and technical measures to include legal and regulatory requirement provisions?	Yes	CSP-owned	Novisto has procedures for changing or eliminating cryptographic keys in case of compromise or end of use				CEK-13	Define, implement and evaluate processes, procedures and technical measures to revoke and remove cryptographic keys prior to the end of its established cryptoperiod, when a key is compromised, or an entity is no longer part of the organization, which include provisions for legal and regulatory requirements.	Key Revocation	
CEK-14.i	Are processes, procedures and technical measures to destroy unneeded keys defined, implemented and evaluated to address key destruction outside secure environments, revocation of keys stored in hardware security modules (HSMs), and include applicable legal and regulatory requirement provisions?	Yes	CSP-owned	Novisto has policies and procedures to manage cryptography, encryption, and key management. Novisto uses Azure Cryptographic services and has procedures for changing or eliminating cryptographic keys in case of compromise or end of use				CEK-14	Define, implement and evaluate processes, procedures and technical measures to destroy keys stored outside a secure environment and revoke keys stored in Hardware Security Modules (HSMs) when they are no longer needed, which include provisions for legal and regulatory requirements.	Key Destruction	
CEK-15.i	Are processes, procedures, and technical measures to create keys in a pre-activated state (i.e., when they have been generated but not authorized for use) being defined, implemented, and evaluated to include legal and regulatory requirement provisions?	Yes	CSP-owned	Novisto has policies and procedures to manage cryptography, encryption, and key management. Novisto uses Azure services to manage the distribution, generation and rotation of cryptographic keys. Azure includes mechanisms to ensure the rotation of keys at regular intervals automatically.				CEK-15	Define, implement and evaluate processes, procedures and technical measures to create keys in a pre-activated state when they have been generated but not authorized for use, which include provisions for legal and regulatory requirements.	Key Activation	
CEK-16.i	Are processes, procedures, and technical measures to monitor, review and approve key transitions (e.g., from any state to/from suspension) being defined, implemented, and evaluated to include legal and regulatory requirement provisions?	Yes	CSP-owned	Novisto has policies and procedures to manage cryptography, encryption, and key management. All encryption services are managed through Azure cryptographic services and automatic deployment using infrastructure as code, no human intervention is required.				CEK-16	Define, implement and evaluate processes, procedures and technical measures to monitor, review and approve key transitions from any state to/from suspension, which include provisions for legal and regulatory requirements.	Key Suspension	
CEK-17.i	Are processes, procedures, and technical measures to deactivate keys (at the time of their expiration date) being defined, implemented, and evaluated to include legal and regulatory requirement provisions?	Yes	CSP-owned	Novisto has policies and procedures to manage cryptography, encryption, and key management. Novisto uses Azure Cryptographic services and has procedures for changing or eliminating cryptographic keys in case of compromise or end of use				CEK-17	Define, implement and evaluate processes, procedures and technical measures to deactivate keys at the time of their expiration date, which include provisions for legal and regulatory requirements.	Key Deactivation	
CEK-18.i	Are processes, procedures, and technical measures to manage archived keys in a secure repository (requiring least privilege access) being defined, implemented, and evaluated to include legal and regulatory requirement provisions?	Yes	CSP-owned	All encryption services are managed through Azure cryptographic services and automatic deployment using infrastructure as code, no human intervention is required.				CEK-18	Define, implement and evaluate processes, procedures and technical measures to manage archived keys in a secure repository requiring least privilege access, which include provisions for legal and regulatory requirements.	Key Archival	

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CEK-19.1	Are processes, procedures, and technical measures to encrypt information in specific scenarios (e.g., only in controlled circumstances and thereafter only for data decryption and never for encryption) being defined, implemented, and evaluated to include legal and regulatory requirement provisions?	Yes	CSP-owned	All Novisto, encryption of confidential and sensitive data is mandatory. Novisto cryptographic operations are supported in Azure Services, which use industry-accepted encryption keys and protocols. Data at rest: devices and storage (objects and databases) and data transfer is encrypted.				CEK-19	Define, implement and evaluate processes, procedures and technical measures to use compromised keys to encrypt information only in controlled circumstance, and thereafter exclusively for decrypting data and never for encrypting data, which include provisions for legal and regulatory requirements.	Key Compromise	
CEK-20.1	Are processes, procedures, and technical measures to assess operational continuity risks (versus the risk of losing control of keying material and exposing protected data) being defined, implemented, and evaluated to include legal and regulatory requirement provisions?	Yes	CSP-owned	All encryption services are managed through Azure cryptographic services and automatic deployment using infrastructure as code, no human intervention is required.				CEK-20	Define, implement and evaluate processes, procedures and technical measures to assess the risk to operational continuity versus the risk of the keying material and the information it protects being exposed if control of the keying material is lost, which include provisions for legal and regulatory requirements.	Key Recovery	
CEK-21.1	Are key management system processes, procedures, and technical measures being defined, implemented, and evaluated to track and report all cryptographic materials and status changes that include legal and regulatory requirements provisions?	Yes	CSP-owned	All encryption services are managed through Azure cryptographic services and automatic deployment using infrastructure as code, no human intervention is required.				CEK-21	Define, implement and evaluate processes, procedures and technical measures in order for the key management system to track and report all cryptographic materials and changes in status, which include provisions for legal and regulatory requirements.	Key Inventory Management	
DCS-01.1	Are policies and procedures for the secure disposal of equipment used outside the organization's premises established, documented, approved, communicated, enforced, and maintained?	Yes	CSP-owned	Novisto has policies and procedures for the secure disposal of equipment, involving secure erasing or destroying media.				DCS-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for the secure disposal of equipment used outside the organization's premises. If the equipment is not physically destroyed a data destruction procedure that renders recovery of information impossible must be applied. Review and update the policies and procedures at least annually.	Off-Site Equipment Disposal Policy and Procedures	
DCS-01.2	Is a data destruction procedure applied that renders information recovery impossible if equipment is not physically destroyed?	Yes	CSP-owned	Novisto has policies and procedures for the secure disposal of equipment, involving secure erasing or destroying media.							
DCS-01.3	Are policies and procedures for the secure disposal of equipment used outside the organization's premises reviewed and updated at least annually?	Yes	CSP-owned	All policies and processes are reviewed once a year							
DCS-02.1	Are policies and procedures for the relocation or transfer of hardware, software, or data/information to an offsite or alternate location established, documented, approved, communicated, implemented, enforced, maintained?	Yes	CSP-owned	Novisto has policies and procedures for physical data transfer. CSC data is never located outside of the originally established location				DCS-02	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for the relocation or transfer of hardware, software, or data/information to an offsite or alternate location. The relocation or transfer request requires the written or cryptographically verifiable authorization. Review and update the policies and procedures at least annually.	Off-Site Transfer Authorization Policy and Procedures	
DCS-02.2	Does a relocation or transfer request require written or cryptographically verifiable authorization?	Yes	CSP-owned	Novisto has policies and procedures for physical data transfer. CSC data is never located outside of the originally established location.							
DCS-02.3	Are policies and procedures for the relocation or transfer of hardware, software, or data/information to an offsite or alternate location reviewed and updated at least annually?	Yes	CSP-owned	All policies and processes are reviewed once a year							
DCS-03.1	Are policies and procedures for maintaining a safe and secure working environment (in offices, rooms, and facilities) established, documented, approved, communicated, enforced, and maintained?	Yes	CSP-owned	Novisto has policies regarding secure working environment				DCS-03	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for maintaining a safe and secure working environment in offices, rooms, and facilities. Review and update the policies and procedures at least annually.	Secure Area Policy and Procedures	
DCS-03.2	Are policies and procedures for maintaining safe, secure working environments (e.g., offices, rooms) reviewed and updated at least annually?	Yes	CSP-owned	All policies and processes are reviewed once a year							
DCS-04.1	Are policies and procedures for the secure transportation of physical media established, documented, approved, communicated, enforced, evaluated, and maintained?	Yes	CSP-owned	While Novisto policies establish the protection for the transport of physical media, Novisto does not manage any physical media that contains CSC data				DCS-04	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for the secure transportation of physical media. Review and update the policies and procedures at least annually.	Secure Media Transportation Policy and Procedures	
DCS-04.2	Are policies and procedures for the secure transportation of physical media reviewed and updated at least annually?	Yes	CSP-owned	While Novisto policies establish the protection for the transport of physical media, Novisto does not manage any physical media that contains CSC data							
DCS-05.1	Is the classification and documentation of physical and logical assets based on the organizational business risk?	Yes	CSP-owned	Classification, location and protection of assets is based in risk analysis				DCS-05	Classify and document the physical, and logical assets (e.g., applications) based on the organizational business risk.	Assets Classification	
DCS-06.1	Are all relevant physical and logical assets at all CSP sites cataloged and tracked within a secured system?	Yes	CSP-owned	Novisto has inventory of all physical and logical assets and its location				DCS-06	Catalogue and track all relevant physical and logical assets located at all of the CSP's sites within a secured system.	Assets Cataloguing and Tracking	Datacenter Security
DCS-07.1	Are physical security perimeters implemented to safeguard personnel, data, and information systems?	Yes	CSP-owned	Headquarter perimeter security is performed by Novisto. Datacenter security is performed by Azure. Both processes are audit as part of the SOC2 certification				DCS-07	Implement physical security perimeters to safeguard personnel, data, and information systems. Establish physical security perimeters between the administrative and business areas and the data storage and processing facilities areas.	Controlled Access Points	
DCS-07.2	Are physical security perimeters established between administrative and business areas, data storage, and processing facilities?	Yes	CSP-owned	Data Centers are provided by Azure, they are physically segregated of Administrative and Business areas.							
DCS-08.1	Is equipment identification used as a method for connection authentication?	Yes	CSP-owned	Physical datacenter security is provided by Azure, that uses certificates/keys and passwords to achieve authentication				DCS-08	Use equipment identification as a method for connection authentication.	Equipment Identification	
DCS-09.1	Are solely authorized personnel able to access secure areas, with all ingress and egress areas restricted, documented, and monitored by physical access control mechanisms?	Yes	CSP-owned	Physical datacenter security is provided by Azure. Headquarter security restrict access only to authorized personnel				DCS-09	Allow only authorized personnel access to secure areas, with all ingress and egress points restricted, documented, and monitored by physical access control mechanisms. Retain access control records on a periodic basis as deemed appropriate by the organization.	Secure Area Authorization	
DCS-09.2	Are access control records retained periodically, as deemed appropriate by the organization?	Yes	CSP-owned	Access logs are retained appropriately							
DCS-10.1	Are external perimeter datacenter surveillance systems and surveillance systems at all ingress and egress points implemented, maintained, and operated?	Yes	CSP-owned	Physical data center security is provided by Azure, validated with their SOC certification				DCS-10	Implement, maintain, and operate datacenter surveillance systems at the external perimeter and at all the ingress and egress points to detect unauthorized ingress and egress attempts.	Surveillance System	
DCS-11.1	Are datacenter personnel trained to respond to unauthorized access or egress attempts?	Yes	CSP-owned	Physical data center security is provided by Azure, validated with their SOC certification				DCS-11	Train datacenter personnel to respond to unauthorized ingress or egress attempts.	Unauthorized Access Response Training	

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DCS-12.1	Are processes, procedures, and technical measures defined, implemented, and evaluated to ensure risk-based protection of power and telecommunication cables from interception, interference, or damage threats at all facilities, offices, and rooms?	Yes	CSP-owned	Physical data center security is provided by Azure, validated with their SOC certification				DCS-12	Define, implement and evaluate processes, procedures and technical measures that ensure a risk-based protection of power and telecommunication cables from a threat of interception, interference or damage at all facilities, offices and rooms.	Cabling Security	
DCS-13.1	Are data center environmental control systems designed to monitor, maintain, and test that on-site temperature and humidity conditions fall within accepted industry standards effectively implemented and maintained?	Yes	CSP-owned	Physical data center security is provided by Azure, validated with their SOC certification				DCS-13	Implement and maintain data center environmental control systems that monitor, maintain and test for continual effectiveness the temperature and humidity conditions within accepted industry standards.	Environmental Systems	
DCS-14.1	Are utility services secured, monitored, maintained, and tested at planned intervals for continual effectiveness?	Yes	CSP-owned	Physical data center security is provided by Azure, validated with their SOC certification				DCS-14	Secure, monitor, maintain, and test utilities services for continual effectiveness at planned intervals.	Secure Utilities	
DCS-15.1	Is business-critical equipment segregated from locations subject to a high probability of environmental risk events?	Yes	CSP-owned	Physical data center security is provided by Azure, validated with their SOC certification				DCS-15	Keep business-critical equipment away from locations subject to high probability for environmental risk events.	Equipment Location	
DSP-01.1	Are policies and procedures established, documented, approved, communicated, enforced, evaluated, and maintained for the classification, protection, and handling of data throughout its lifecycle according to all applicable laws and regulations, standards, and risk level?	Yes	CSP-owned	Novisto has data security and privacy policies and procedures				DSP-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for the classification, protection and handling of data throughout its lifecycle, and according to all applicable laws and regulations, standards, and risk level. Review and update the policies and procedures at least annually.	Security and Privacy Policy and Procedures	
DSP-01.2	Are data security and privacy policies and procedures reviewed and updated at least annually?	Yes	Shared CSP and CSC	Novisto reviews all its policies and procedures at least once a year				DSP-02	Apply industry accepted methods for the secure disposal of data from storage media such that data is not recoverable by any forensic means.	Secure Disposal	
DSP-02.1	Are industry-accepted methods applied for secure data disposal from storage media so information is not recoverable by any forensic means?	Yes	CSP-owned	Novisto performs secure deletion or destruction of any digital media before discarding				DSP-03	Create and maintain a data inventory; at least for any sensitive data and personal data.	Data Inventory	
DSP-03.1	Is a data inventory created and maintained for sensitive and personal information (at a minimum)?	Yes	Shared CSP and CSC	Novisto maintains a data security policy that states how data is managed consistent with its classification				DSP-04	Classify data according to its type and sensitivity level.	Data Classification	
DSP-04.1	Is data classified according to type and sensitivity levels?	Yes	Shared CSP and CSC	Novisto has data classification policies to describe how data has to be managed and protected according to its sensitivity and impact				DSP-05	Create data flow documentation to identify what data is processed, stored or transmitted where. Review data flow documentation at defined intervals, at least annually, and after any change.	Data Flow Documentation	
DSP-05.1	Is data flow documentation created to identify what data is processed and where it is stored and transmitted?	Yes	Shared CSP and CSC	Novisto maintains an updated inventory of processing, flows and storage media.				DSP-06	Document ownership and stewardship of all relevant documented personal and sensitive data. Perform review at least annually.	Data Ownership and Stewardship	
DSP-05.2	Is data flow documentation reviewed at defined intervals, at least annually, and after any change?	Yes	Shared CSP and CSC	Novisto reviews all its policies and procedures at least once a year				DSP-07	Develop systems, products, and business practices based upon a principle of security by design and industry best practices.	Data Protection by Design and Default	
DSP-06.1	Is the ownership and stewardship of all relevant personal and sensitive data documented?	Yes	Shared CSP and CSC	Novisto's data security policy assigns owners to data. The owner is the person or group responsible for managing and protecting the data				DSP-08	Develop systems, products, and business practices based upon a principle of privacy by design and industry best practices. Ensure that systems' privacy settings are configured by default, according to all applicable laws and regulations.	Data Privacy by Design and Default	
DSP-06.2	Is data ownership and stewardship documentation reviewed at least annually?	Yes	Shared CSP and CSC	Novisto reviews all its policies and procedures at least once a year				DSP-09	Conduct a Data Protection Impact Assessment (DPIA) to evaluate the origin, nature, particularity and severity of the risks upon the processing of personal data, according to any applicable laws, regulations and industry best practices.	Data Protection Impact Assessment	
DSP-07.1	Are systems, products, and business practices based on security principles by design and per industry best practices?	Yes	CSP-owned	Novisto has processes to ensure security is taken into account in its operation and in all stages of the development lifecycle, including design. The security team performs periodic security reviews.				DSP-10	Define, implement and evaluate processes, procedures and technical measures that ensure any transfer of personal or sensitive data is protected from unauthorized access and only processed within scope as permitted by the respective laws and regulations.	Sensitive Data Transfer	Data Security and Privacy Lifecycle Management
DSP-08.1	Are systems, products, and business practices based on privacy principles by design and according to industry best practices?	Yes	CSP-owned	Novisto has internal processes and controls, awareness programs, training and education, to ensure security and privacy by default and the application of industry best practices				DSP-11	Define and implement, processes, procedures and technical measures to enable data subjects to request access to, modification, or deletion of their personal data, according to any applicable laws and regulations.	Personal Data Access, Reversal, Rectification and Deletion	
DSP-08.2	Are systems' privacy settings configured by default and according to all applicable laws and regulations?	Yes	CSP-owned	Novisto has internal processes and controls, awareness programs, training and education, to ensure security and privacy by default and the application of industry best practices, laws and regulations				DSP-12	Define, implement and evaluate processes, procedures and technical measures to ensure that personal data is processed according to any applicable laws and regulations and for the purposes declared to the data subject.	Limitation of Purpose in Personal Data Processing	
DSP-09.1	Is a data protection impact assessment (DPIA) conducted when processing personal data and evaluating the origin, nature, particularity, and severity of risks according to any applicable laws, regulations and industry best practices?	Yes	Shared CSP and CSC	Novisto conducted a DPIA for personal information Novisto Services needs to operate: user names and email addresses	CSC has to perform an alternate DPIA if plans to include any additional personal data in Novisto services.			DSP-13	Define, implement and evaluate processes, procedures and technical measures for the transfer and sub-processing of personal data within the service supply chain, according to any applicable laws and regulations.	Personal Data Sub-processing	
DSP-10.1	Are processes, procedures, and technical measures defined, implemented, and evaluated to ensure any transfer of personal or sensitive data is protected from unauthorized access and only processed within scope (as permitted by respective laws and regulations)?	Yes	Shared CSP and CSC	Novisto has security measures to protect against unauthorized personal or sensitive data access, and also to ensure data is processed within the defined scope.	CSC has to configure access and roles according the type of information is storing in Novisto						
DSP-11.1	Are processes, procedures, and technical measures defined, implemented, and evaluated to enable data subjects to request access to, modify, or delete personal data (per applicable laws and regulations)?	Yes	Shared CSP and CSC	Novisto only collects basic personal data (name and email, optional attributes such as title and department can be added and edited by the user or a CSC administrator) and it is used only for the purpose of identification, authentication and data auditability, hence cannot be deleted.	The compliance with this control has to be evaluated by CSC if they upload any personal data to Novisto						
DSP-12.1	Are processes, procedures, and technical measures defined, implemented, and evaluated to ensure personal data is processed (per applicable laws and regulations and for the purposes declared to the data subject)?	Yes	Shared CSP and CSC	Novisto only collects basic personal data (name and email, optional attributes such as title and department can be added and edited by the user or a CSC administrator) and it is used only for the purpose of identification and authentication. Our service agreement states how CSC information is processed.	The compliance with this control has to be evaluated by CSC if they upload any personal data to Novisto						
DSP-13.1	Are processes, procedures, and technical measures defined, implemented, and evaluated for the transfer and sub-processing of personal data within the service supply chain (according to any applicable laws and regulations)?	Yes	CSP-owned	Novisto only collects basic personal data (name and email, optional attributes such as title and department can be added and edited by the user or a CSC administrator) and it is used only for the purpose of identification and authentication. Novisto details its agreements for the transfer and sub-processing of personal data within the service supply chain per applicable laws and regulations in the Data Processing and Security Terms.							

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DSP-14.1	Are processes, procedures, and technical measures defined, implemented, and evaluated to disclose details to the data owner of any personal or sensitive data access by sub-processors before processing initiation?	Yes	Shared CSP and CSC	Novisto only collects basic personal data (name and email, optional attributes such as title and department) and it is used only for the purpose of identification and authentication. Currently, Novisto does not use any sub-processor but has policies and procedures to communicate with CSCs in that case.	CSCs have to evaluate the compliance with this control if personal information is included in Novisto service, in that case, Novisto would be the sub-processors of that information			DSP-14	Define, implement and evaluate processes, procedures and technical measures to disclose the details of any personal or sensitive data access by sub-processors to the data owner prior to initiation of that processing.	Disclosure of Data Sub-processors	
DSP-15.1	Is authorization from data owners obtained, and the associated risk managed, before replicating or using production data in non-production environments?	Yes	Shared CSP and CSC	Production data is never used in non-production environments.	CSCs have to evaluate the compliance with this control if personal information is included in Novisto service, in that case, Novisto would be the sub-processors of that information			DSP-15	Obtain authorization from data owners, and manage associated risk before replicating or using production data in non-production environments.	Limitation of Production Data Use	
DSP-16.1	Do data retention, archiving, and deletion practices follow business requirements, applicable laws, and regulations?	Yes	Shared CSP and CSC	Personal data obtained by Novisto (Name and email of users) is used for the operation of the service, and it is maintained while the service is active	CSCs have to evaluate the compliance with this control if personal information is included in Novisto service, in that case, Novisto would be the sub-processors of that information			DSP-16	Data retention, archiving and deletion is managed in accordance with business requirements, applicable laws and regulations.	Data Retention and Deletion	
DSP-17.1	Are processes, procedures, and technical measures defined and implemented to protect sensitive data throughout its lifecycle?	Yes	Shared CSP and CSC	Novisto has security measures to protect against unauthorized personal or sensitive data access, and also to ensure data is processed within the defined scope.	CSC has to configure access and roles according to the type of information is storing in Novisto			DSP-17	Define and implement, processes, procedures and technical measures to protect sensitive data throughout its lifecycle.	Sensitive Data Protection	
DSP-18.1	Does the CSP have in place, and describe to CSCs, the procedure to manage and respond to requests for disclosure of Personal Data by Law Enforcement Authorities according to applicable laws and regulations?	Yes	CSP-owned	Requests for disclosure procedure is described in our Service Agreements.				DSP-18	The CSP must have in place, and describe to CSCs the procedure to manage and respond to requests for disclosure of Personal Data by Law Enforcement Authorities according to applicable laws and regulations. The CSP must give special attention to the notification procedure to interested CSCs, unless otherwise prohibited, such as a prohibition under criminal law to preserve confidentiality of a law enforcement investigation.	Disclosure Notification	
DSP-18.2	Does the CSP give special attention to the notification procedure to interested CSCs, unless otherwise prohibited, such as a prohibition under criminal law to preserve confidentiality of a law enforcement investigation?	Yes	CSP-owned	Notifications are defined in the Service Agreements.							
DSP-19.1	Are processes, procedures, and technical measures defined and implemented to specify and document physical data locations, including locales where data is processed or backed up?	Yes	CSP-owned	CSCs are able to choose the location of the data. We currently support multiple regions in Canada, the US and the EU. Backups are located in regions or the same geographical area (for instance Canada)				DSP-19	Define and implement, processes, procedures and technical measures to specify and document the physical locations of data, including any locations in which data is processed or backed up.	Data Location	
GRC-01.1	Are information governance program policies and procedures sponsored by organizational leadership established, documented, approved, communicated, applied, evaluated, and maintained?	Yes	CSP-owned	Novisto maintains an ISMS and evidence of its effectiveness is provided via SOC2 certification, soon also ISO27001 certification				GRC-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for an information governance program, which is sponsored by the leadership of the organization. Review and update the policies and procedures at least annually.	Governance Program Policy and Procedures	
GRC-01.2	Are the policies and procedures reviewed and updated at least annually?	Yes	CSP-owned	Novisto reviews all policies and procedures at least once a year							
GRC-02.1	Is there an established formal, documented, and leadership-sponsored enterprise risk management (ERM) program that includes policies and procedures for identification, evaluation, ownership, treatment, and acceptance of cloud security and privacy risks?	Yes	CSP-owned	Novisto has documented its risk management procedures as part of its ISMS				GRC-02	Establish a formal, documented, and leadership-sponsored Enterprise Risk Management (ERM) program that includes policies and procedures for identification, evaluation, ownership, treatment, and acceptance of cloud security and privacy risks.	Risk Management Program	
GRC-03.1	Are all relevant organizational policies and associated procedures reviewed at least annually, or when a substantial organizational change occurs?	Yes	CSP-owned	Policies and procedures are reviewed at least annually and substantial changes had occurred				GRC-03	Review all relevant organizational policies and associated procedures at least annually or when a substantial change occurs within the organization.	Organizational Policy Reviews	Governance, Risk and Compliance
GRC-04.1	Is an approved exception process mandated by the governance program established and followed whenever a deviation from an established policy occurs?	Yes	CSP-owned	Novisto includes management of exceptions and compensations within its policies				GRC-04	Establish and follow an approved exception process as mandated by the governance program whenever a deviation from an established policy occurs.	Policy Exception Process	
GRC-05.1	Has an information security program (including programs of all relevant CCM domains) been developed and implemented?	Yes	CSP-owned	Novisto maintains an ISMS aligned with CCM and evidence of its effectiveness is provided via SOC2 certification, soon also with ISO/IEC 27001 certification.				GRC-05	Develop and implement an Information Security Program, which includes programs for all the relevant domains of the CCM.	Information Security Program	
GRC-06.1	Are roles and responsibilities for planning, implementing, operating, assessing, and improving governance programs defined and documented?	Yes	CSP-owned	Roles and responsibilities are documented and authorized by leadership as part of Novisto's ISMS				GRC-06	Define and document roles and responsibilities for planning, implementing, operating, assessing, and improving governance programs.	Governance Responsibility Model	
GRC-07.1	Are all relevant standards, regulations, legal/contractual, and statutory requirements applicable to your organization identified and documented?	Yes	CSP-owned	Novisto legal teams are involved in identifying legal and statutory requirements. Novisto continuously reviews all applicable standards and regulations				GRC-07	Identify and document all relevant standards, regulations, legal/contractual, and statutory requirements, which are applicable to your organization.	Information System Regulatory Mapping	
GRC-08.1	Is contact established and maintained with cloud-related special interest groups and other relevant entities?	Yes	CSP-owned	Novisto security team maintains contact with security and cloud-related special interest groups				GRC-08	Establish and maintain contact with cloud-related special interest groups and other relevant entities in line with business context.	Special Interest Groups	
HRS-01.1	Are background verification policies and procedures of all new employees (including but not limited to remote employees, contractors, and third parties) established, documented, approved, communicated, applied, evaluated, and maintained?	Yes	CSP-owned	Novisto conducts employment, professional and criminal background checks for all employees and contractors.							
HRS-01.2	Are background verification policies and procedures designed according to local laws, regulations, ethics, and contractual constraints and proportional to the data classification to be accessed, business requirements, and acceptable risk?	Yes	CSP-owned	Novisto conducts employment, professional and criminal background checks for all employees and contractors according to local laws, regulations, ethics, and acceptable risk				HRS-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for background verification of all new employees (including but not limited to remote employees, contractors, and third parties) according to local laws, regulations, ethics, and contractual constraints and proportional to the data classification to be accessed, the business requirements, and acceptable risk. Review and update the policies and procedures at least annually.	Background Screening Policy and Procedures	
HRS-01.3	Are background verification policies and procedures reviewed and updated at least annually?	Yes	CSP-owned	Novisto reviews all policies and procedures at least once a year							
HRS-02.1	Are policies and procedures for defining allowances and conditions for the acceptable use of organizationally-owned or managed assets established, documented, approved, communicated, applied, evaluated, and maintained?	Yes	CSP-owned	Novisto has established a Code of Conduct which describes the acceptable use of Novisto's owned and managed assets.				HRS-02	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for defining allowances and conditions for the acceptable use of organizationally-owned or managed assets. Review and update the policies	Acceptable Use of Technology Policy and	

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HRS-02.2	Are the policies and procedures for defining allowances and conditions for the acceptable use of organizationally-owned or managed assets reviewed and updated at least annually?	Yes	CSP-owned	Code of conduct is reviewed once a year					and procedures at least annually.	Procedures	
HRS-03.1	Are policies and procedures requiring unattended workspaces to conceal confidential data established, documented, approved, communicated, applied, evaluated, and maintained?	Yes	CSP-owned	Novisto has established formal security policies that require all personnel to not leave sensitive materials unattended. In addition, workstations, laptops, and mobile devices are configured such that they lock out after a pre-defined period of time.				HRS-03	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures that require unattended workspaces to not have openly visible confidential data. Review and update the policies and procedures at least annually.	Clean Desk Policy and Procedures	
HRS-03.2	Are policies and procedures requiring unattended workspaces to conceal confidential data reviewed and updated at least annually?	Yes	CSP-owned	Novisto's policies and procedures are reviewed at least once a year							
HRS-04.1	Are policies and procedures to protect information accessed, processed, or stored at remote sites and locations established, documented, approved, communicated, applied, evaluated, and maintained?	Yes	CSP-owned	Novisto has policies for remote working, including security and privacy practices for protecting data while working remotely.				HRS-04	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures to protect information accessed, processed or stored at remote sites and locations. Review and update the policies and procedures at least annually.	Remote and Home Working Policy and Procedures	
HRS-04.2	Are policies and procedures to protect information accessed, processed, or stored at remote sites and locations reviewed and updated at least annually?	Yes	CSP-owned	Novisto's policies and procedures are reviewed at least once a year							
HRS-05.1	Are return procedures of organizationally-owned assets by terminated employees established and documented?	Yes	CSP-owned	All employees have to return their assigned assets before leaving the company				HRS-05	Establish and document procedures for the return of organization-owned assets by terminated employees.	Asset returns	Human Resources
HRS-06.1	Are procedures outlining the roles and responsibilities concerning changes in employment established, documented, and communicated to all personnel?	Yes	Shared CSP and CSC	Novisto maintains personnel policies and access control procedures including transfers and terminations. Novisto removes access to corporate assets on a timely basis upon submission	CSC should administer the access and roles of Novisto users according to its own policies			HRS-06	Establish, document, and communicate to all personnel the procedures outlining the roles and responsibilities concerning changes in employment.	Employment Termination	
HRS-07.1	Are employees required to sign an employment agreement before gaining access to organizational information systems, resources, and assets?	Yes	CSP-owned	All employees have to sign the Code of Conduct and an NDA				HRS-07	Employees sign the employee agreement prior to being granted access to organizational information systems, resources and assets.	Employment Agreement Process	
HRS-08.1	Are provisions and/or terms for adherence to established information governance and security policies included within employment agreements?	Yes	CSP-owned	All employees have to sign the Code of Conduct and an NDA				HRS-08	The organization includes within the employment agreements provisions and/or terms for adherence to established information governance and security policies.	Employment Agreement Content	
HRS-09.1	Are employee roles and responsibilities relating to information assets and security documented and communicated?	Yes	CSP-owned	Novisto includes security requirements and responsibilities in job descriptions. All employees have to sign the Code of conduct and an NDA				HRS-09	Document and communicate roles and responsibilities of employees, as they relate to information assets and security.	Personnel Roles and Responsibilities	
HRS-10.1	Are requirements for non-disclosure/confidentiality agreements reflecting organizational data protection needs and operational details identified, documented, and reviewed at planned intervals?	Yes	CSP-owned	Novisto performs periodic reviews of NDA and Code of Conduct and made them sign them in case of changes				HRS-10	Identify, document, and review, at planned intervals, requirements for non-disclosure/confidentiality agreements reflecting the organization's needs for the protection of data and operational details.	Non-Disclosure Agreements	
HRS-11.1	Is a security awareness training program for all employees of the organization established, documented, approved, communicated, applied, evaluated and maintained?	Yes	CSP-owned	Novisto conducts information security and privacy awareness training for all new employees and contractors, once at the beginning of employment or contract, and then once a year.				HRS-11	Establish, document, approve, communicate, apply, evaluate and maintain a security awareness training program for all employees of the organization and provide regular training updates.	Security Awareness Training	
HRS-11.2	Are regular security awareness training updates provided?	Yes	CSP-owned	Novisto performs periodic reviews of security awareness training content and performs security awareness training once per year for all personnel							
HRS-12.1	Are all employees granted access to sensitive organizational and personal data provided with appropriate security awareness training?	Yes	CSP-owned	Novisto conducts information security and privacy awareness training for all new employees and contractors, once at the beginning of employment or contract, and then once a year.				HRS-12	Provide all employees with access to sensitive organizational and personal data with appropriate security awareness training and regular updates in organizational procedures, processes, and policies relating to their professional function relative to the organization.	Personal and Sensitive Data Awareness and Training	
HRS-12.2	Are all employees granted access to sensitive organizational and personal data provided with regular updates in procedures, processes, and policies relating to their professional function?	Yes	CSP-owned	Novisto performs an annual review of all its policies and procedures, in case of change, new versions are communicated to all related personnel.							
HRS-13.1	Are employees notified of their roles and responsibilities to maintain awareness and compliance with established policies, procedures, and applicable legal, statutory, or regulatory compliance obligations?	Yes	CSP-owned	Novisto includes security requirements and responsibilities in job descriptions. All employees have to sign the Code of conduct and an NDA				HRS-13	Make employees aware of their roles and responsibilities for maintaining awareness and compliance with established policies and procedures and applicable legal, statutory, or regulatory compliance obligations.	Compliance User Responsibility	
IAM-01.1	Are identity and access management policies and procedures established, documented, approved, communicated, implemented, applied, evaluated, and maintained?	Yes	Shared CSP and CSC	Novisto has the identity and access management policies and procedures in place. Access is granted based on need-to-know and job functions.	CSC has to establish its own identity and access management policies and procedures to manage access levels (roles) of its employees to Novisto services			IAM-01	Establish, document, approve, communicate, implement, apply, evaluate and maintain policies and procedures for identity and access management. Review and update the policies and procedures at least annually.	Identity and Access Management Policy and Procedures	
IAM-01.2	Are identity and access management policies and procedures reviewed and updated at least annually?	Yes	Shared CSP and CSC	Novisto performs annual review of policies and procedures	CSC has to review its own policies and procedures regarding user access						
IAM-02.1	Are strong password policies and procedures established, documented, approved, communicated, implemented, applied, evaluated, and maintained?	Yes	Shared CSP and CSC	Novisto apply strong password policies and MFA enforcement for all of its employees. Policies and procedures are reviewed at least once per year	CSC has to define its own password policies and procedures, they can choose between Single Sign On (preferred option) and basic authentication (email and password). If the last is selected, CSC can configure an enforced password policy in the Novisto platform.			IAM-02	Establish, document, approve, communicate, implement, apply, evaluate and maintain strong password policies and procedures. Review and update the policies and procedures at least annually.	Strong Password Policy and Procedures	
IAM-02.2	Are strong password policies and procedures reviewed and updated at least annually?	Yes	Shared CSP and CSC	Novisto policies and procedures are reviewed at least once a year	CSC has to review its own policies and procedures regarding user access						
IAM-03.1	Is system identity information and levels of access managed, stored, and reviewed?	Yes	Shared CSP and CSC	Novisto maintains an updated inventory of levels of access granted to its employees, level of access reviews are performed quarterly	CSC has to have its own access review policies and procedures regarding Novisto services			IAM-03	Manage, store, and review the information of system identities, and level of access.	Identity Inventory	
IAM-04.1	Is the separation of duties principle employed when implementing information system access?	Yes	CSP-owned	Novisto restricts access based on need-to-know and job function, using the least privilege principle and separation of duties concept				IAM-04	Employ the separation of duties principle when implementing information system access.	Separation of Duties	

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IAM-05.I	Is the least privilege principle employed when implementing information system access?	Yes	Shared CSP and CSC	Novisto restricts access based on need-to-know and job function, using the least privilege principle and separation of duties concept	CSC has to apply the least privilege principle in administering user access to Novisto services			IAM-05	Employ the least privilege principle when implementing information system access.	Least Privilege	Identity & Access Management
IAM-06.I	Is a user access provisioning process defined and implemented which authorizes, records, and communicates data and assets access changes?	Yes	Shared CSP and CSC	Novisto has a formal access management procedure that states responsibilities and tasks in managing user access.	CSC has to follow its own identity management procedures to provide and administer user access to Novisto services			IAM-06	Define and implement a user access provisioning process which authorizes, records, and communicates access changes to data and assets.	User Access Provisioning	
IAM-07.I	Is a process in place to de-provision or modify the access, in a timely manner, of movers / leavers or system identity changes, to effectively adopt and communicate identity and access management policies?	Yes	Shared CSP and CSC	Novisto has a formal access management procedure that states responsibilities and tasks in managing user access, including de-provisioning	CSC has to include user de-provisioning in its procedures regarding access to Novisto services			IAM-07	De-provision or respectively modify access of movers / leavers or system identity changes in a timely manner in order to effectively adopt and communicate identity and access management policies.	User Access Changes and Revocation	
IAM-08.I	Are reviews and revalidation of user access for least privilege and separation of duties completed with a frequency commensurate with organizational risk tolerance?	Yes	Shared CSP and CSC	Novisto performs quarterly review of user access	CSC has to define and perform periodic review of user access regarding Novisto services			IAM-08	Review and revalidate user access for least privilege and separation of duties with a frequency that is commensurate with organizational risk tolerance.	User Access Review	
IAM-09.I	Are processes, procedures, and technical measures for the segregation of privileged access roles defined, implemented, and evaluated such that administrative data access, encryption, key management capabilities, and logging capabilities are distinct and separate?	Yes	CSP-owned	Novisto maintains a separation of duties matrix to document the organizational roles established within the organization. Novisto employs the principle of least privilege, allowing only authorized access for users necessary to accomplish their job functions.				IAM-09	Define, implement and evaluate processes, procedures and technical measures for the segregation of privileged access roles such that administrative access to data, encryption and key management capabilities and logging capabilities are distinct and separated.	Segregation of Privileged Access Roles	
IAM-10.I	Is an access process defined and implemented to ensure privileged access roles and rights are granted for a limited period?	Yes	CSP-owned	Access rights are granted only to required personnel for the time required. Access reviews are periodically performed				IAM-10	Define and implement an access process to ensure privileged access roles and rights are granted for a time limited period, and implement procedures to prevent the culmination of segregated privileged access.	Management of Privileged Access Roles	
IAM-10.2	Are procedures implemented to prevent the culmination of segregated privileged access?	Yes	CSP-owned	Novisto maintains a separation of duties matrix to document the organizational roles established within the organization. Novisto employs the principle of least privilege, allowing only authorized access for users necessary to accomplish their job functions.							
IAM-11.I	Are processes and procedures for customers to participate, where applicable, in granting access for agreed, high risk as (defined by the organizational risk assessment) privileged access roles defined, implemented and evaluated?	Yes	CSP-owned	Novisto restricts access based on need-to-know and job function, using the least privilege principle and separation of duties concept				IAM-11	Define, implement and evaluate processes and procedures for customers to participate, where applicable, in the granting of access for agreed, high risk (as defined by the organizational risk assessment) privileged access roles.	CSCs Approval for Agreed Privileged Access Roles	
IAM-12.I	Are processes, procedures, and technical measures to ensure the logging infrastructure is "read-only" for all with write access (including privileged access roles) defined, implemented, and evaluated?	Yes	CSP-owned	Logging infrastructure is configured as read-only in Azure.	Novisto logs are read-only, neither administrator can delete them			IAM-12	Define, implement and evaluate processes, procedures and technical measures to ensure the logging infrastructure is read-only for all with write access, including privileged access roles, and that the ability to disable it is controlled through a procedure that ensures the segregation of duties and break glass procedures.	Safeguard Logs Integrity	
IAM-12.2	Is the ability to disable the "read-only" configuration of logging infrastructure controlled through a procedure that ensures the segregation of duties and break glass procedures?	Yes	CSP-owned	Disable read-only configuration on logging requires a special procedure that ensure segregation or duties	Novisto logs are read-only, neither administrator can delete them						
IAM-13.I	Are processes, procedures, and technical measures that ensure users are identifiable through unique identification (or can associate individuals with user identification usage) defined, implemented, and evaluated?	Yes	Shared CSP and CSC	Policies and procedures are defined and enforced with respect to unique user identification.	CSC has to ensure every Novisto user has a unique user/password and refrain to use generic users			IAM-13	Define, implement and evaluate processes, procedures and technical measures that ensure users are identifiable through unique IDs or which can associate individuals to the usage of user IDs.	Uniquely Identifiable Users	Interoperability & Portability
IAM-14.I	Are processes, procedures, and technical measures for authenticating access to systems, application, and data assets including multifactor authentication for a least-privileged user and sensitive data access defined, implemented, and evaluated?	Yes	Shared CSP and CSC	Novisto enforce the use of multifactor authentication, access is limited to authorized personnel and audited periodically.	Novisto recommends CSC use SSO and apply multi-factor authentication on its side. Basic authentication does not support MFA			IAM-14	Define, implement and evaluate processes, procedures and technical measures for authenticating access to systems, application and data assets, including multifactor authentication for at least privileged user and sensitive data access. Adopt digital certificates or alternatives which achieve an equivalent level of security for system identities.	Strong Authentication	
IAM-14.2	Are digital certificates or alternatives that achieve an equivalent security level for system identities adopted?	Yes	CSP-owned	Novisto uses machine certificates to establish device identity							
IAM-15.I	Are processes, procedures, and technical measures for the secure management of passwords defined, implemented, and evaluated?	Yes	Shared CSP and CSC	Novisto enforces the use of complex passwords and multi-factor authentication	Novisto recommends CSC use SSO and enforce password complexity and multi-factor authentication. Basic Authentication does not support MFA but allows to enforce of password policies			IAM-15	Define, implement and evaluate processes, procedures and technical measures for the secure management of passwords.	Passwords Management	
IAM-16.I	Are processes, procedures, and technical measures to verify access to data and system functions authorized, defined, implemented, and evaluated?	Yes	Shared CSP and CSC	Novisto performs periodic access data rights reviews and reports any issue at security team	Novisto recommends CSC perform periodic reviews of assigned roles in Novisto services			IAM-16	Define, implement and evaluate processes, procedures and technical measures to verify access to data and system functions is authorized.	Authorization Mechanisms	
IPY-01.I	Are policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained for communications between application services (e.g., APIs)?	Yes	CSP-owned	Novisto provides inter-connectivity through API. API development is controlled by Novisto SDLC							
IPY-01.2	Are policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained for information processing interoperability?	Yes	CSP-owned	Novisto provides inter-connectivity through API. API development is controlled by Novisto SDLC							
IPY-01.3	Are policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained for application development portability?	Yes	CSP-owned	Novisto performs annual review of all its policies and procedures				IPY-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for interoperability and portability including requirements for: a. Communications between application interfaces b. Information processing interoperability c. Application development portability d. Information/Data exchange, usage, portability, integrity, and persistence Review and update the policies and procedures at least annually.	Interoperability and Portability Policy and Procedures	
IPY-01.4	Are policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained for information/data exchange, usage, portability, integrity, and persistence?	Yes	CSP-owned	Novisto provides interconnectivity through API. API development is controlled by Novisto SDLC. Novisto allows the export of data in multiple formats							
IPY-01.5	Are interoperability and portability policies and procedures reviewed and updated at least annually?	Yes	CSP-owned	Novisto performs annual review of all its policies and procedures							
IPY-02.I	Are CSCs able to programmatically retrieve their data via an application interface(s) to enable interoperability and portability?	Yes	CSP-owned	APIs are available for all functionality and can be used for interoperability and portability.				IPY-02	Provide application interface(s) to CSCs so that they programmatically retrieve their data to enable interoperability and portability.	Application Interface Availability	

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IPY-03.1	Are cryptographically secure and standardized network protocols implemented for the management, import, and export of data?	Yes	CSP-owned	All data exchange is performed through encrypted channels					IPY-03	Implement cryptographically secure and standardized network protocols for the management, import and export of data.	Secure Interoperability and Portability Management	Infrastructure & Virtualization Security
IPY-04.1	Do agreements include provisions specifying CSC data access upon contract termination, and have the following? a. Data format b. Duration data will be stored c. Scope of the data retained and made available to the CSCs d. Data deletion policy	Yes	CSP-owned	Novisto allows data export in multiple formats, including CSV and other structured documents. All ESG data is kept for the duration of the contract since it is required for reports, benchmarking and auditability. All data is securely deleted max 30 days after the contract termination.					IPY-04	Agreements must include provisions specifying CSCs access to data upon contract termination and will include: a. Data format b. Length of time the data will be stored c. Scope of the data retained and made available to the CSCs d. Data deletion policy	Data Portability Contractual Obligations	
IVS-01.1	Are infrastructure and virtualization security policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained?	Yes	CSP-owned	Virtualization security is provided by Azure. Azure supports its controls with its own SOC certification					IVS-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for infrastructure and virtualization security. Review and update the policies and procedures at least annually.	Infrastructure and Virtualization Security Policy and Procedures	
IVS-01.2	Are infrastructure and virtualization security policies and procedures reviewed and updated at least annually?	Yes	CSP-owned	Virtualization security is provided by Azure. Azure supports its controls with its own SOC certification								
IVS-02.1	Is resource availability, quality, and capacity planned and monitored in a way that delivers required system performance, as determined by the business?	Yes	CSP-owned	Availability, quality and capacity are monitored to ensure compliance with our defined SLA.					IVS-02	Plan and monitor the availability, quality, and adequate capacity of resources in order to deliver the required system performance as determined by the business.	Capacity and Resource Planning	
IVS-03.1	Are communications between environments monitored?	Yes	CSP-owned	Virtualization security is provided by Azure. Azure supports its controls with its own SOC certification. Communication between virtual environments is restricted and monitored								
IVS-03.2	Are communications between environments encrypted?	Yes	CSP-owned	Novisto use encrypted channels for all communication out of defined segments								
IVS-03.3	Are communications between environments restricted to only authenticated and authorized connections, as justified by the business?	Yes	CSP-owned	Virtualization security is provided by Azure. Azure supports its controls with its own SOC certification. Communication between virtual environments is restricted and monitored					IVS-03	Monitor, encrypt and restrict communications between environments to only authenticated and authorized connections, as justified by the business. Review these configurations at least annually, and support them by a documented justification of all allowed services, protocols, ports, and compensating controls.	Network Security	
IVS-03.4	Are network configurations reviewed at least annually?	Yes	CSP-owned	Virtualization security is provided by Azure. Azure supports its controls with its own SOC certification. Virtual networking configuration is reviewed monthly								
IVS-03.5	Are network configurations supported by the documented justification of all allowed services, protocols, ports, and compensating controls?	Yes	CSP-owned	Virtualization security is provided by Azure. We annually review the Azure SOC 2 report, including network-related controls. All network configuration is documented and approved.								
IVS-04.1	Is every host and guest OS, hypervisor, or infrastructure control plane hardened (according to their respective best practices) and supported by technical controls as part of a security baseline?	Yes	CSP-owned	Virtualization security is provided by Azure. Azure supports its controls with its own SOC certification.					IVS-04	Harden host and guest OS, hypervisor or infrastructure control plane according to their respective best practices, and supported by technical controls, as part of a security baseline.	OS Hardening and Base Controls	
IVS-05.1	Are production and non-production environments separated?	Yes	CSP-owned	Production and non-production Virtual environment are separated					IVS-05	Separate production and non-production environments.	Production and Non-Production Environments	
IVS-06.1	Are applications and infrastructures designed, developed, deployed, and configured such that CSP and CSC (tenant) user access and intra-tenant access is appropriately segmented, segregated, monitored, and restricted from other tenants?	Yes	CSP-owned	Novisto provides tenant segmentation using separate virtual databases and blob accounts per customer					IVS-06	Design, develop, deploy and configure applications and infrastructures such that CSP and CSC (tenant) user access and intra-tenant access is appropriately segmented and segregated, monitored and restricted from other tenants.	Segmentation and Segregation	
IVS-07.1	Are secure and encrypted communication channels including only up-to-date and approved protocols used when migrating servers, services, applications, or data to cloud environments?	Yes	CSP-owned	Novisto does not perform migration of data, servers, services or applications to cloud environments. CSCs that needs to migrate their data will do it tough up to date and approved protocols					IVS-07	Use secure and encrypted communication channels when migrating servers, services, applications, or data to cloud environments. Such channels must include only up-to-date and approved protocols.	Migration to Cloud Environments	
IVS-08.1	Are high-risk environments identified and documented?	Yes	CSP-owned	Novisto utilizes Azure segmentation to create software-defined perimeters and set rules that govern the traffic between them according to the Zero Trust model.					IVS-08	Identify and document high-risk environments.	Network Architecture Documentation	
IVS-09.1	Are processes, procedures, and defense-in-depth techniques defined, implemented, and evaluated for protection, detection, and timely response to network-based attacks?	Yes	CSP-owned	Novisto uses Azure Security Services to ensure protection, detection and timely response to network-based attacks.					IVS-09	Define, implement and evaluate processes, procedures and defense-in-depth techniques for protection, detection, and timely response to network-based attacks.	Network Defense	
LOG-01.1	Are logging and monitoring policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained?	Yes	CSP-owned	Novisto has logging and monitoring policies and procedures					LOG-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for logging and monitoring. Review and update the policies and procedures at least annually.	Logging and Monitoring Policy and Procedures	Security & Compliance
LOG-01.2	Are policies and procedures reviewed and updated at least annually?	Yes	CSP-owned	Novisto review all policies and procedures at least once a year					LOG-02	Define, implement and evaluate processes, procedures and technical measures to ensure the security and retention of audit logs.	Audit Logs Protection	
LOG-02.1	Are processes, procedures, and technical measures defined, implemented, and evaluated to ensure audit log security and retention?	Yes	CSP-owned	Logs are stored for 1 year in Azure.	Novisto logs are maintained forever				LOG-02	Define, implement and evaluate processes, procedures and technical measures to ensure the security and retention of audit logs.	Audit Logs Protection	
LOG-03.1	Are security-related events identified and monitored within applications and the underlying infrastructure?	Yes	Shared CSP and CSC	Novisto performs weekly reviews of logs for all its platform	CSC should define the review of user activities on Novisto service according to its own policies				LOG-03	Identify and monitor security-related events within applications and the underlying infrastructure. Define and implement a system to generate alerts to responsible stakeholders based on such events and corresponding metrics.	Security Monitoring and Alerting	
LOG-03.2	Is a system defined and implemented to generate alerts to responsible stakeholders based on security events and their corresponding metrics?	Yes	CSP-owned	Azure sends alarms and notifications to Novisto security team								
LOG-04.1	Is access to audit logs restricted to authorized personnel, and are records maintained to provide unique access accountability?	Yes	Shared CSP and CSC	Log access is restricted to authorized personnel, and records are maintained for a minimum of 12 months.	Novisto logs access is managed by the CSC administrator				LOG-04	Restrict audit logs access to authorized personnel and maintain records that provide unique access accountability.	Audit Logs Access and Accountability	
LOG-05.1	Are security audit logs monitored to detect activity outside of typical or expected patterns?	Yes	CSP-owned	Novisto performs weekly reviews of logs for all its platform					LOG-05	Monitor security audit logs to detect activity outside of typical or expected patterns. Establish and follow a defined process to review and take appropriate and timely actions on detected anomalies.	Audit Logs Monitoring and Response	Operational Resilience
LOG-05.2	Is a process established and followed to review and take appropriate and timely actions on detected anomalies?	Yes	CSP-owned	Novisto performs weekly reviews of logs for all its platform. Any detected anomaly should be reported as a ticket								
LOG-06.1	Is a reliable time source being used across all relevant information processing systems?	Yes	CSP-owned	Time source is provided by Azure					LOG-06	Use a reliable time source across all relevant information processing systems.	Clock Synchronization	

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LOG-07.1	Are logging requirements for information meta/data system events established, documented, and implemented?	Yes	CSP-owned	Log collection is defined and approved before implementation. Log collection includes metadata				LOG-07	Establish, document and implement which information meta/data system events should be logged. Review and update the scope at least annually or whenever there is a change in the threat environment.	Logging Scope	Logging and Monitoring
LOG-07.2	Is the scope reviewed and updated at least annually, or whenever there is a change in the threat environment?	Yes	CSP-owned	Scope of logging is reviewed at least annually							
LOG-08.1	Are audit records generated, and do they contain relevant security information?	Yes	CSP-owned	Platforms and infrastructure audit records are generated by Azure. Application logs are generated by Applications. All of them contain relevant information	CSC activity logs are generated by Novisto and register user activities and changes			LOG-08	Generate audit records containing relevant security information.	Log Records	
LOG-09.1	Does the information system protect audit records from unauthorized access, modification, and deletion?	Yes	CSP-owned	Access to logs is restricted to the minimal required. Periodic reviews are performed to assess conformity.	Logs are read only			LOG-09	The information system protects audit records from unauthorized access, modification, and deletion.	Log Protection	
LOG-10.1	Are monitoring and internal reporting capabilities established to report on cryptographic operations, encryption, and key management policies, processes, procedures, and controls?	Yes	CSP-owned	Periodic monitoring includes cryptographic operations, encryption and key management.				LOG-10	Establish and maintain a monitoring and internal reporting capability over the operations of cryptographic, encryption and key management policies, processes, procedures, and controls.	Encryption Monitoring and Reporting	
LOG-11.1	Are key lifecycle management events logged and monitored to enable auditing and reporting on cryptographic keys' usage?	Yes	CSP-owned	Periodic monitoring includes cryptographic operations, encryption and key management.				LOG-11	Log and monitor key lifecycle management events to enable auditing and reporting on usage of cryptographic keys.	Transaction/Activity Logging	
LOG-12.1	Is physical access logged and monitored using an auditable access control system?	Yes	CSP-owned	Physical access logging is Azure responsibility. Azure supports its process with a SOC certification				LOG-12	Monitor and log physical access using an auditable access control system.	Access Control Logs	
LOG-13.1	Are processes and technical measures for reporting monitoring system anomalies and failures defined, implemented, and evaluated?	Yes	CSP-owned	Novisto has policies and procedures for reporting detected anomalies and failures				LOG-13	Define, implement and evaluate processes, procedures and technical measures for the reporting of anomalies and failures of the monitoring system and provide immediate notification to the accountable party.	Failures and Anomalies Reporting	
LOG-13.2	Are accountable parties immediately notified about anomalies and failures?	Yes	CSP-owned	Anomalies and failures are notified immediately							
SEF-01.1	Are policies and procedures for security incident management, e-discovery, and cloud forensics established, documented, approved, communicated, applied, evaluated, and maintained?	Yes	CSP-owned	Novisto has policies and procedures for incident management and reporting. This procedure is included in SOC certification and tested at least once a year				SEF-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for Security Incident Management, E-Discovery, and Cloud Forensics. Review and update the policies and procedures at least annually.	Security Incident Management Policy and Procedures	
SEF-01.2	Are policies and procedures reviewed and updated annually?	Yes	CSP-owned	Novisto reviews all its policies and procedures at least once a year							Security Incident Management, E-Discovery, & Cloud Forensics
SEF-02.1	Are policies and procedures for timely management of security incidents established, documented, approved, communicated, applied, evaluated, and maintained?	Yes	CSP-owned	Novisto has policies and procedures for incident management and reporting. This procedure is included in SOC certification and tested at least once a year				SEF-02	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for the timely management of security incidents. Review and update the policies and procedures at least annually.	Service Management Policy and Procedures	
SEF-02.2	Are policies and procedures for timely management of security incidents reviewed and updated at least annually?	Yes	CSP-owned	Novisto reviews all its policies and procedures at least once a year							
SEF-03.1	Is a security incident response plan that includes relevant internal departments, impacted CSCs, and other business-critical relationships (such as supply-chain) established, documented, approved, communicated, applied, evaluated, and maintained?	Yes	CSP-owned	Novisto's security incident response plan includes relevant internal departments and communication with affected customers.				SEF-03	'Establish, document, approve, communicate, apply, evaluate and maintain a security incident response plan, which includes but is not limited to: relevant internal departments, impacted CSCs, and other business critical relationships (such as supply-chain) that may be impacted.'	Incident Response Plans	
SEF-04.1	Is the security incident response plan tested and updated for effectiveness, as necessary, at planned intervals or upon significant organizational or environmental changes?	Yes	CSP-owned	Security incident plan is tested at least once a year				SEF-04	Test and update as necessary incident response plans at planned intervals or upon significant organizational or environmental changes for effectiveness.	Incident Response Testing	
SEF-05.1	Are information security incident metrics established and monitored?	Yes	CSP-owned	Novisto performs continuous monitoring of logs, alarms and incidents to determine causes and take corrective and preventive measures				SEF-05	Establish and monitor information security incident metrics.	Incident Response Metrics	
SEF-06.1	Are processes, procedures, and technical measures supporting business processes to triage security-related events defined, implemented, and evaluated?	Yes	CSP-owned	Incident response process includes triage of incidents				SEF-06	Define, implement and evaluate processes, procedures and technical measures supporting business processes to triage security-related events.	Event Triage Processes	
SEF-07.1	Are processes, procedures, and technical measures for security breach notifications defined and implemented?	Yes	CSP-owned	Incident response process include security breach notifications				SEF-07	Define and implement, processes, procedures and technical measures for security breach notifications. Report security breaches and assumed security breaches including any relevant supply chain breaches, as per applicable SLAs, laws and regulations.	Security Breach Notification	
SEF-07.2	Are security breaches and assumed security breaches reported (including any relevant supply chain breaches) as per applicable SLAs, laws, and regulations?	Yes	CSP-owned	Incident response process include security breach notifications, in line with SLA, laws and regulations							
SEF-08.1	Are points of contact maintained for applicable regulation authorities, national and local law enforcement, and other legal jurisdictional authorities?	Yes	CSP-owned	Point of contacts are established at beginning of the contract				SEF-08	Maintain points of contact for applicable regulation authorities, national and local law enforcement, and other legal jurisdictional authorities.	Points of Contact Maintenance	
STA-01.1	Are policies and procedures implementing the shared security responsibility model (SSRM) within the organization established, documented, approved, communicated, applied, evaluated, and maintained?	Yes	CSP-owned	Novisto's policies and procedures establish the CSP's responsibilities with the provided services. Novisto provides its CSCs with information on their responsibilities.				STA-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for the application of the Shared Security Responsibility Model (SSRM) within the organization. Review and update the policies and procedures at least annually.	SSRM Policy and Procedures	
STA-01.2	Are the policies and procedures that apply the SSRM reviewed and updated annually?	Yes	CSP-owned	Novisto reviews all policies and procedures at least once a year							
STA-02.1	Is the SSRM applied, documented, implemented, and managed throughout the supply chain for the cloud service offering?	Yes	CSP-owned	Novisto performs annual reviews of its provider's SOC certifications to ensure alignment with policies and appropriated risk management. Novisto performs risk analysis of all third-party software involved in the operation				STA-02	Apply, document, implement and manage the SSRM throughout the supply chain for the cloud service offering.	SSRM Supply Chain	
STA-03.1	Is the CSC given SSRM guidance detailing information about SSRM applicability throughout the supply chain?	Yes	CSP-owned	Novisto provide documentation and training regarding CSC responsibilities and management of SSRM				STA-03	Provide SSRM Guidance to the CSC detailing information about the SSRM applicability throughout the supply chain.	SSRM Guidance	
STA-04.1	Is the shared ownership and applicability of all CSA CCM controls delineated according to the SSRM for the cloud service offering?	Yes	CSP-owned	All CSA CMM controls are evaluated for all Novisto services				STA-04	Delineate the shared ownership and applicability of all CSA CCM controls according to the SSRM for the cloud service offering.	SSRM Control Ownership	
STA-05.1	Is SSRM documentation for all cloud services the organization uses reviewed and validated?	Yes	Shared CSP and CSC	All CSA CMM controls are evaluated for all Novisto services	CSC should review and validate this CAIQ matrix			STA-05	Review and validate SSRM documentation for all cloud services offerings the organization uses.	SSRM Documentation Review	

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STA-06.i	Are the portions of the SSRM the organization is responsible for implemented, operated, audited, or assessed?	Yes	Shared CSP and CSC	Novisto performs annual audits to ensure all controls and procedures operate in an appropriate way.	CSC should establish the mechanisms to ensure the correct execution of its responsibilities	STA-06	Implement, operate, and audit or assess the portions of the SSRM which the organization is responsible for.	SSRM Control Implementation	Supply Chain Management, Transparency, and Accountability
STA-07.i	Is an inventory of all supply chain relationships developed and maintained?	Yes	CSP-owned	Novisto maintains inventory of supply chain		STA-07	Develop and maintain an inventory of all supply chain relationships.	Supply Chain Inventory	
STA-08.i	Are risk factors associated with all organizations within the supply chain periodically reviewed by CSPs?	Yes	CSP-owned	Novisto performs annual reviews of its provider's SOC certifications to ensure alignment with policies and appropriate risk management. Novisto performs risk analysis of all third-party software involved in the operation		STA-08	CSPs periodically review risk factors associated with all organizations within their supply chain.	Supply Chain Risk Management	
STA-09.i	Do service agreements between CSPs and CSCs (tenants) incorporate at least the following mutually agreed upon provisions and/or terms? • Scope, characteristics, and location of business relationship and services offered • Information security requirements (including SSRM) • Change management process • Logging and monitoring capability • Incident management and communication procedures • Right to audit and third-party assessment • Service termination • Interoperability and portability requirements • Data privacy	Yes	CSP-owned	Novisto Service agreements include scope, security, locations, termination, audit, and other related elements. Our Governance, Risk and Compliance program contains detailed policies and procedures related to all elements, including, change management, logging, communication, and data privacy.		STA-09	Service agreements between CSPs and CSCs (tenants) must incorporate at least the following mutually-agreed upon provisions and/or terms: • Scope, characteristics and location of business relationship and services offered • Information security requirements (including SSRM) • Change management process • Logging and monitoring capability • Incident management and communication procedures • Right to audit and third party assessment • Service termination • Interoperability and portability requirements • Data privacy	Primary Service and Contractual Agreement	
STA-10.i	Are supply chain agreements between CSPs and CSCs reviewed at least annually?	Yes	CSP-owned	Agreements between CSP and SCS are reviewed at least annually.		STA-10	Review supply chain agreements between CSPs and CSCs at least annually.	Supply Chain Agreement Review	Threat & Vulnerability Management
STA-11.i	Is there a process for conducting internal assessments at least annually to confirm the conformance and effectiveness of standards, policies, procedures, and SLA activities?	Yes	CSP-owned	Novisto performs annual audits to ensure all controls and procedures operate in an appropriated way.		STA-11	Define and implement a process for conducting internal assessments to confirm conformance and effectiveness of standards, policies, procedures, and service level agreement activities at least annually.	Internal Compliance Testing	
STA-12.i	Are policies that require all supply chain CSPs to comply with information security confidentiality, access control, privacy, audit, personnel policy, and service level requirements and standards implemented?	Yes	CSP-owned	Novisto performs annual reviews of its provider's SOC certifications to ensure alignment with policies and appropriate risk management. Novisto performs risk analysis of all third-party software involved in the operation		STA-12	Implement policies requiring all CSPs throughout the supply chain to comply with information security, confidentiality, access control, privacy, audit, personnel policy and service level requirements and standards.	Supply Chain Service Agreement Compliance	
STA-13.i	Are supply chain partner IT governance policies and procedures reviewed periodically?	Yes	CSP-owned	Novisto performs annual reviews of its provider's SOC certifications to ensure alignment with policies and appropriate risk management. Novisto performs risk analysis of all third-party software involved in the operation		STA-13	Periodically review the organization's supply chain partners' IT governance policies and procedures.	Supply Chain Governance Review	
STA-14.i	Is a process to conduct periodic security assessments for all supply chain organizations defined and implemented?	Yes	CSP-owned	Novisto performs annual reviews of its provider's SOC certifications to ensure alignment with policies and appropriate risk management. Novisto performs risk analysis of all third-party software involved in the operation		STA-14	Define and implement a process for conducting security assessments periodically for all organizations within the supply chain.	Supply Chain Data Security Assessment	Threat & Vulnerability Management
TVM-01.i	Are policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained to identify, report, and prioritize the remediation of vulnerabilities to protect systems against vulnerability exploitation?	Yes	CSP-owned	Novisto has Vulnerability management policies and procedures to ensure appropriate response and remediation to vulnerabilities		TVM-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures to identify, report and prioritize the remediation of vulnerabilities, in order to protect systems against vulnerability exploitation. Review and update the policies and procedures at least annually.	Threat and Vulnerability Management Policy and Procedures	
TVM-01.2	Are threat and vulnerability management policies and procedures reviewed and updated at least annually?	Yes	CSP-owned	Novisto reviews all policies and procedures at least once a year					
TVM-02.i	Are policies and procedures to protect against malware on managed assets established, documented, approved, communicated, applied, evaluated, and maintained?	Yes	CSP-owned	Novisto has antimlware policies and procedures to prevent, identify and respond to any suspicion on the presence of malware		TVM-02	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures to protect against malware on managed assets. Review and update the policies and procedures at least annually.	Malware Protection Policy and Procedures	
TVM-02.2	Are asset management and malware protection policies and procedures reviewed and updated at least annually?	Yes	CSP-owned	Novisto reviews all policies and procedures at least once a year					
TVM-03.i	Are processes, procedures, and technical measures defined, implemented, and evaluated to enable scheduled and emergency responses to vulnerability identifications (based on the identified risk)?	Yes	CSP-owned	Novisto has Vulnerability management policies and procedures to ensure appropriate response and remediation to vulnerabilities. Includes emergency responses		TVM-03	Define, implement and evaluate processes, procedures and technical measures to enable both scheduled and emergency responses to vulnerability identifications, based on the identified risk.	Vulnerability Remediation Schedule	
TVM-04.i	Are processes, procedures, and technical measures defined, implemented, and evaluated to update detection tools, threat signatures, and compromise indicators weekly (or more frequent) basis?	Yes	CSP-owned	Novisto performs weekly reviews of logs and alarms that may indicate a compromise in security. Novisto uses security services provided by Azure as part of its security strategy. this security services include Log Analytics, Alarm generation, Vulnerability detection, compliance and behaviour analysis		TVM-04	Define, implement and evaluate processes, procedures and technical measures to update detection tools, threat signatures, and indicators of compromise on a weekly, or more frequent basis.	Detection Updates	
TVM-05.i	Are processes, procedures, and technical measures defined, implemented, and evaluated to identify updates for applications that use third-party or open-source libraries (according to the organization's vulnerability management policy)?	Yes	CSP-owned	Novisto has policies and processes regarding the update of all software involved in the service, including libraries. Code and dependencies vulnerabilities are detected automatically in our source control repository, and unsecured code cannot be merged.		TVM-05	Define, implement and evaluate processes, procedures and technical measures to identify updates for applications which use third party or open source libraries according to the organization's vulnerability management policy.	External Library Vulnerabilities	
TVM-06.i	Are processes, procedures, and technical measures defined, implemented, and evaluated for periodic, independent, third-party penetration testing?	Yes	CSP-owned	Novisto reviews all policies and procedures at least once a year		TVM-06	Define, implement and evaluate processes, procedures and technical measures for the periodic performance of penetration testing by independent third parties.	Penetration Testing	
TVM-07.i	Are processes, procedures, and technical measures defined, implemented, and evaluated for vulnerability detection on organizationally managed assets at least monthly?	Yes	CSP-owned	Novisto performs in-house external monthly vulnerability scans and annual expert third-party scans and pent tests. Additionally, Azure performs continuous internal vulnerability scans to all infrastructure involved in the service		TVM-07	Define, implement and evaluate processes, procedures and technical measures for the detection of vulnerabilities on organizationally managed assets at least monthly.	Vulnerability Identification	
TVM-08.i	Is vulnerability remediation prioritized using a risk-based model from an industry-recognized framework?	Yes	CSP-owned	Novisto uses the Common Vulnerability Scoring System (CVSS)		TVM-08	Use a risk-based model for effective prioritization of vulnerability remediation using an industry recognized framework.	Vulnerability Prioritization	

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Question ID	Question	CSP CAIQ Answer	SSRM Control Ownership	CSP Implementation Description (Optional/Recommended)	CSC Responsibilities (Optional/Recommended)			CCM Control ID	CCM Control Specification	CCM Control Title	CCM Domain Title
TYM-09.1	Is a process defined and implemented to track and report vulnerability identification and remediation activities that include stakeholder notification?	Yes	CSP-owned	Novisto has Vulnerability management policies and procedures to ensure appropriate response and remediation to vulnerabilities. Includes stakeholder communications				TYM-09	Define and implement a process for tracking and reporting vulnerability identification and remediation activities that includes stakeholder notification.	Vulnerability Management Reporting	
TYM-10.1	Are metrics for vulnerability identification and remediation established, monitored, and reported at defined intervals?	Yes	CSP-owned	Novisto performs periodic audits of control and procedure compliance				TYM-10	Establish, monitor and report metrics for vulnerability identification and remediation at defined intervals.	Vulnerability Management Metrics	
UEM-01.1	Are policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained for all endpoints?	Yes	CSP-owned	Novisto establish policies and procedures for endpoint management				UEM-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for all endpoints. Review and update the policies and procedures at least annually.	Endpoint Devices Policy and Procedures	
UEM-01.2	Are universal endpoint management policies and procedures reviewed and updated at least annually?	Yes	CSP-owned	Novisto performs annual reviews of all policies and procedures				UEM-02	Define, document, apply and evaluate a list of approved services, applications and sources of applications (stores) acceptable for use by endpoints when accessing or storing organization-managed data.	Application and Service Approval	
UEM-02.1	Is there a defined, documented, applicable and evaluated list containing approved services, applications, and the sources of applications (stores) acceptable for use by endpoints when accessing or storing organization-managed data?	Yes	CSP-owned	Novisto has policies regarding approved services and applications for endpoints				UEM-03	Define and implement a process for the validation of the endpoint device's compatibility with operating systems and applications.	Compatibility	
UEM-03.1	Is a process defined and implemented to validate endpoint device compatibility with operating systems and applications?	Yes	CSP-owned	Endpoint requirements and compatibility has been established				UEM-04	Maintain an inventory of all endpoints used to store and access company data.	Endpoint Inventory	
UEM-04.1	Is an inventory of all endpoints used and maintained to store and access company data?	Yes	CSP-owned	Inventory is reviewed Monthly				UEM-05	Define, implement and evaluate processes, procedures and technical measures to enforce policies and controls for all endpoints permitted to access systems and/or store, transmit, or process organizational data.	Endpoint Management	
UEM-05.1	Are processes, procedures, and technical measures defined, implemented and evaluated, to enforce policies and controls for all endpoints permitted to access systems and/or store, transmit, or process organizational data?	Yes	CSP-owned	Novisto enforce the compliance with policies and controls in endpoints through the use of administrative tools				UEM-06	Configure all relevant interactive-use endpoints to require an automatic lock screen.	Automatic Lock Screen	
UEM-06.1	Are all relevant interactive-use endpoints configured to require an automatic lock screen?	Yes	CSP-owned	Automatic lock screen is enforced				UEM-07	Manage changes to endpoint operating systems, patch levels, and/or applications through the company's change management processes.	Operating Systems	Universal Endpoint Management
UEM-07.1	Are changes to endpoint operating systems, patch levels, and/or applications managed through the organizational change management process?	Yes	CSP-owned	The change management process includes endpoint administration.				UEM-08	Protect information from unauthorized disclosure on managed endpoint devices with storage encryption.	Storage Encryption	
UEM-08.1	Is information protected from unauthorized disclosure on managed endpoints with storage encryption?	Yes	CSP-owned	All endpoints are encrypted				UEM-09	Configure managed endpoints with anti-malware detection and prevention technology and services.	Anti-Malware Detection and Prevention	
UEM-09.1	Are anti-malware detection and prevention technology services configured on managed endpoints?	Yes	CSP-owned	All endpoints have antimalware software				UEM-10	Configure managed endpoints with properly configured software firewalls.	Software Firewall	
UEM-10.1	Are software firewalls configured on managed endpoints?	Yes	CSP-owned	All endpoints have firewall software				UEM-11	Configure managed endpoints with Data Loss Prevention (DLP) technologies and rules in accordance with a risk assessment.	Data Loss Prevention	
UEM-11.1	Are managed endpoints configured with data loss prevention (DLP) technologies and rules per a risk assessment?	Yes	CSP-owned	Endpoints are configured with DLP software				UEM-12	Enable remote geo-location capabilities for all managed mobile endpoints.	Remote Locate	
UEM-12.1	Are remote geolocation capabilities enabled for all managed mobile endpoints?	Yes	CSP-owned	MDM software used at Novisto allows the geolocation of mobile endpoints				UEM-13	Define, implement and evaluate processes, procedures and technical measures to enable the deletion of company data remotely on managed endpoint devices.	Remote Wipe	
UEM-13.1	Are processes, procedures, and technical measures defined, implemented, and evaluated to enable remote company data deletion on managed endpoint devices?	Yes	CSP-owned	Novisto has policies and procedures for remote data deletion in case of loss of endpoints				UEM-14	Define, implement and evaluate processes, procedures and technical and/or contractual measures to maintain proper security of third-party endpoints with access to organizational assets.	Third-Party Endpoint Security Posture	
UEM-14.1	Are processes, procedures, and technical and/or contractual measures defined, implemented, and evaluated to maintain proper security of third-party endpoints with access to organizational assets?	Yes	CSP-owned	No third parties have access to organizational assets. Novisto established controls to prevent unauthorized access.							

End of Standard

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