







Agenda

- **About the speakers**
- **SME in the Netherlands**
- ISMS example 1 (Atlassian)
- ISMS example 2 (Office 365)



Gilbert van Zeijl

- Certified Security and Privacy
 Officer
- > 25 years IT experience
- 20 years Health care experience
- Information quality and security
- Privacy
- IT Risk management
- IT auditor

- Software & SAAS companies
- Health Care & Cure
- Small Medium Enterprises



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Nico van Rooyen

- Certified Information SecurityManager
- Certified Information Systems
 Auditor
- Certified Ethical Hacker
- > 8 years Privacy and security experience
- Regulation Compliance
- IT auditor
- ISO 27001

- Online gambling
- **E-Commerce**
- Small Medium Enterprises



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Small Medium Enterprises in the Netherlands

70% werkzame personen marktsector in MKB



70% Dutch employed persons



1.92 Milion SME companies



€1027 Bilion yearly revenue



60% added value

Company size, The Netherlands

werkzame personen, begin vierde kwartaal 2015



Source: De Staat van het MKB 2015; CBS

SME definition

MKB in beeld

Het midden- en kleinbedrijf bestaat uit ondernemingen met maximaal **250 werknemers.** Van alle Nederlandse bedrijven valt **96% in deze categorie.**



MICRO ONDERNEMING

< 10 werknemers omzet van € 700K



KLEINE ONDERNEMING

< 50 werknemers, omzet van € 12 miljoen



MIDDELGROTE
ONDERNEMING

< 250 werknemers omzet van € 40 milioen Micro: < 10 employees

< €700 k

Small: < 50 employees

< €12 M

Medium: < 250 employees <€40 M



Source: MKB in beeld (MKB servicedesk.nl)

ISMS example 1

Using Atlassian



ISO High Level Structure



Example of a Software company Key Partners Key Activities Value Proposition Customer relationships Customer Segments

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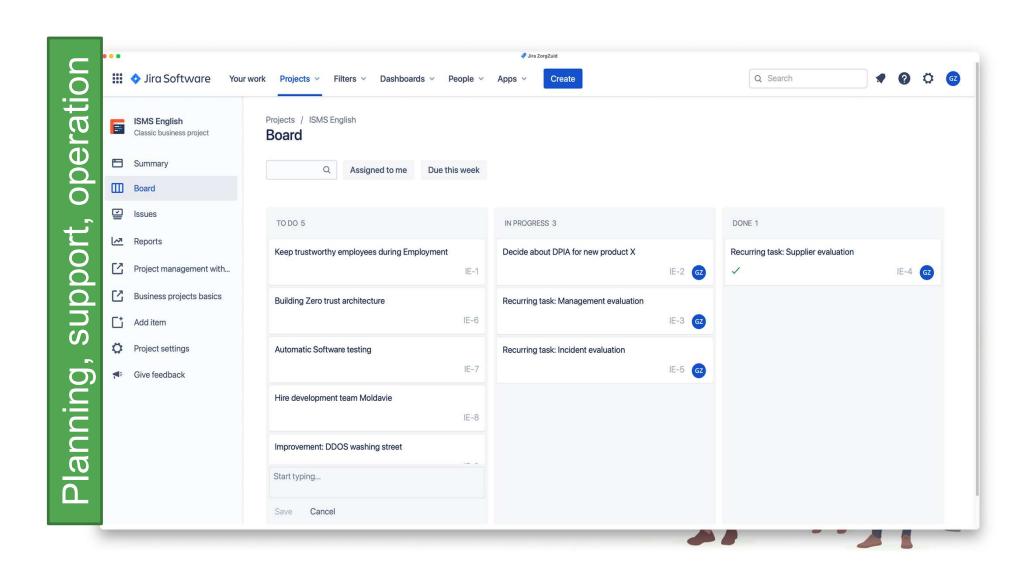
Key Partners IT hosting partner IT housing partner Marketing partner Knowledge partner External developers External testers	Froduct Development Product delivery Customer Support Sales & Marketing	Value Proposition SAAS dienst, App of Web. Software Consultancy	Customer relationships	Customer Segments
External testers	1/			
	Key resources		Channels	
Finance & administration	IP / knowledge Employees Director/owner Primary Information		Webpage Digital newsletter Direct marketing	
	system			
	Customer data			
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Cost Structures

Labour / personell (In- External) 80% Hosting / housing IT Rest: marketing, administration, advisors, suppliers Revenu Streams

Recurring revenu.

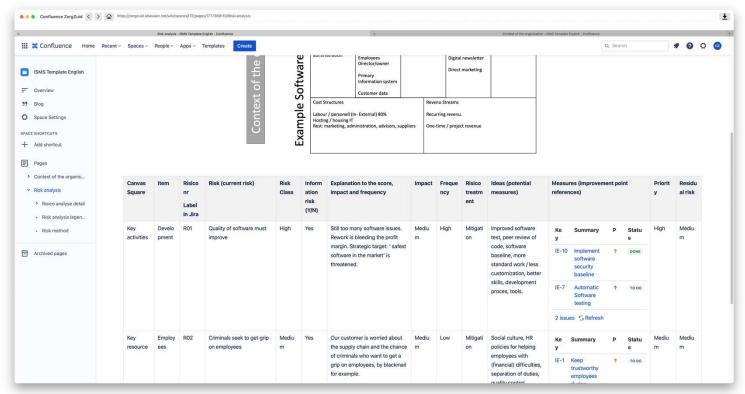
One-time / project revenue



Risk management

- Management involvement
- Based on business canvas as risk framework
- Percieved risk is thus business risk
- Mitigating measures defined on improvement board (Jira)
- Simple feedback on status in risk matrix (Jira Query)
- Examples in Jira / Confluence

Risk management Example



Link ISO standard with internal policies



- Pages
- Audit and compliance
- Statement of ap...
- · Compliance over...

Index Annex A to Internal policies

- Index Annex A to...
- Audit & Methodo...
- Detail contro...
- CALCADO COMPANSO SANDO
- A.5.1.2 R...
- A.5.1.2 R
- A.6.1.1 In...
- A.6.1.2 S...
- A.6.1.3 C...
 A.6.1.4 C...
- . A.6.1.5 In...
- A.6.2.1 M...
- A.6.2.2 T...



Information Security & Privacy Management System (ISMS) Template.

Reference index between Annex A & internal policies

Control	Subclause	Control	Applicable	Policy	Policy_links	Compliance_status	Audit_date	Improvement_points
A.5.1.1 Policies for information security	A.5.1 Information security policies	A set of policies for information security shall be defined, approved by management, published and communicated to employees and relevant external parties.	Yes	Information Security Policy, see link	Information Security Policy	Compliant		
A.5.1.2 Review of the policies for information security	A.5.1 Information security policies	The policies for information security shall be reviewed at planned intervals or if significant changes occur to ensure their continuing suitability, adequacy and effectiveness.	Yes	Review yearly during management evaluation. Standard part of the agenda		Compliant		
A.6.1.1 Information security roles and responsibilities	A.6.1 Internal organization	All information security responsibilities shall be defined and allocated.	Yes	Roles related to policy definition, planning, execution and control have been defined in annex to Information security policy		Non-Compliant		
A.6.1.2 Segregation of duties	A.6.1 Internal organization	Conflicting duties and areas of responsibility shall be segregated to reduce opportunities for unauthorized or unintentional modification or misuse of the organization's assets.	Yes			Compliant		
A.6.1.3 Contact with authorities	A.6.1 Internal organization	Appropriate contacts with relevant authorities shall be maintained.	Yes					
A.6.1.4 Contact with special interest groups		Appropriate contacts with special interest groups or other specialist security forums and professional associations shall be maintained.	Yes					

ISMS example 2

Using Office 365



Working with SMEs

The Good

- Limited bureaucracy
- Few decision makers
- Fast adapting and ever changing organisation culture
- Major contributions by few people

The Bad

- Limited resources (man power and funds)
- Dependency on key recourses
- Projects loose momentum
- Expect more pay less attitude
- Limited accountability

The Ugly truth

- More systems than employees
- Outsourcing is often cost effective
- Limited skill inhouse



Before you start your ISMS

What do you need to know?

- Your organisational strategy
- Your cost per control
- The impact of the ISMS on the way of working
- Tools and skills at your disposal

What do you need to do?/ Where do you start?

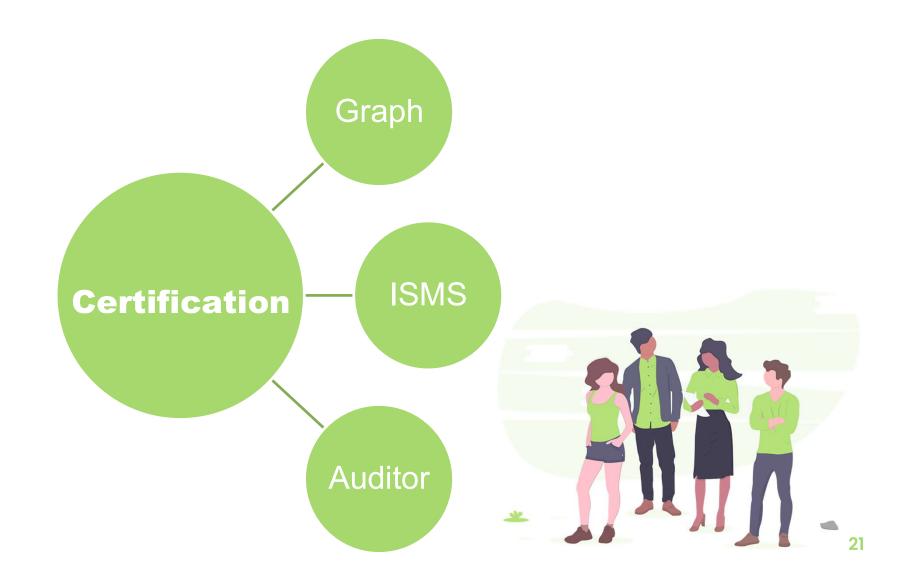
- First, Integrate effective controls
- Integrate low hanging fruit
- Integrate full or limited audit scope
- Lastly, integrate failed controls by designing them as effective controls

Automation is key! Comply with more controls using fewer people and less resources.

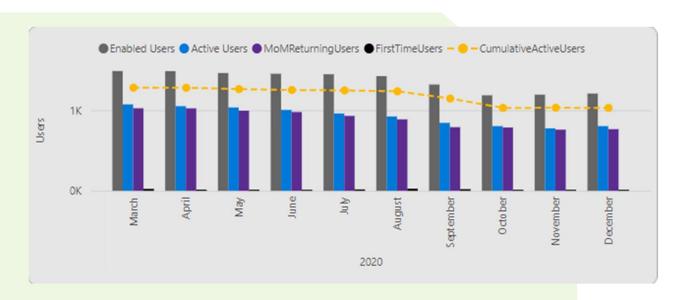
"Auditors think in lists. Auditees think in graphs.

As long as this is true, auditees win."

John Lambert



Graph



- Enabled users = number of licences allocated / available
- Active users = users active in the month
- MoM returning users = users active in the month that were also active in the preceding month
- First time users = New users / employees

Drill down view

December 2020 Active User %

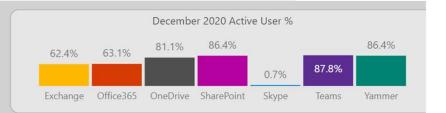
63.1%

December 2020 Active and Enabled Users

152 of 241

December 2020 Returning User %

99.3%



Year •	Enabled Users	Active Users	MoM Returning Users	First Time Users	Cumulative Active Users	Active User %	MoM Returning User %
⊡ 2020							
⊕ March	284	204	195	6	256	71.8%	0.0
April	285	202	198	1	256	70.9%	97.
⊕ May	280	208	195	3	255	74.3%	96
∃une	282	195	193	1	256	69.1%	92
∃ July	279	181	174	3	255	64.9%	89
	283	173	165	5	259	61.1%	91
∃ September	285	162	146	3	261	56.8%	84
⊕ October	240	151	147	0	217	62.9%	90
	239	144	140	2	218	60.3%	92
+ December	241	152	143	2	219	63.1%	99

① D E



Ref. #	Control Name	ISO 27001 Requirement	NIST Requirement	GDPR Relevant / Article	Α	T	Ad e	Mandatory documents list ISO 27001	Nice to have documents list	Observation s & Recommend ations
A.9.2	User Access Management									
Control Objective	To ensure authorized user access and to p	revent unauthorized access to systems and services.								
A.9.2.1	User Registration and deregistration	A formal user registration and de-registration process shall be implemented to enable assignment of access rights	AC-1 AC-2	Article 16 Article 17	L					
			<u>IA-1</u>		L					
A.9.2.2	User access provisioning	A formal user access provisioning process shall be implemented to assign or revoke access rights for all user types to all systems and services	IA-3							
			<u>IA-4</u>		┕					
A.9.2.3	Management of privileged access rights	The allocation and use of privileged access rights shall be restricted and controlled	<u>IA-5</u> <u>IA-6</u>		L					
			<u>IA-7</u>		╙					
A.9.2.4	Management of secret authentication information of users	The allocation of secret authentication information shall be controlled through formal management process	<u>IA-8</u> <u>IA-9</u>							
			IA-10		1	L				
A.9.2.5	Review of User Access Rights	Asset owners shall review users' access rights at regular intervals	<u>IA-11</u>		E	-				
A 0.2.C	Demonder of the state of the st	The second data of all amplement and automatical actions and faffic and the second sec	4		⊢	+	+			+
A.9.2.6	Removal or adjustment of access rights	The access rights of all employees and external party users to information and information processing facilities shall be removed upon termination of their employment, contract or agreement, or adjusted upon change								



Audit PBC list

IT algemeen	Indienst	Vastlegging van indienstprocedure voor een medewerker die toegang heeft gekregen tot
IT Algemeen	Checklist uitdienst	Checklist uitdienst voor een medewerker welke toegang had tot

The end

