

ISO/IEC 27018:2019 Annex A Controls			Applicable Y/N	Implemented Full,partial,None,N/A	Justification for exclusion	Justification for Inclusion				Remarks (For internal reference)
Clause	Sec	Control Objective/Control				LR	CO	BR/BP	RRA	
2 Consent and choice	2.1	Obligation to co-operate regarding PII principals' rights	Yes	Full		X				
3 Purpose legitimacy and specification	3.1	Public cloud PII processor's purpose	Yes	Full		X				
	3.2	Public cloud PII processor's commercial use	Yes	Full		X				
4 Collection limitation										
5 Data minimization	5.1	Secure erasure of temporary files	Yes	Full						
6 Use, retention and disclosure limitation	6.1	PII disclosure notification	Yes	Full		X				
	6.2	Recording of PII disclosures	Yes	Full		X				
7 Accuracy and quality	13.1	Network security management	Yes	Full				X		
	13.1.4	Alignment of security management for virtual and physical networks	Yes	Full				X		
8 Openness, transparency and notice	8.1	Disclosure of sub-contracted PII processing	Yes	Full		X				
9 Individual participation and access										
10 Accountability	10.1	Notification of a data breach involving PII	Yes	Full		X				
	10.2	Retention period of administrative security policies and guidelines	Yes	Full		X				
	10.3	PII return and disposal	Yes	Full		X				
11 Information Security	11.1	Confidentiality or non-disclosure agreements	Yes	Full		X				
	11.2	Restriction of the creation of hardcopy material	Yes	Full					X	
	11.3	Control and logging of data restoration	Yes	Full					X	
	11.4	Protecting data on storage media leaving the premises	Yes	Full					X	
	11.5	Use of unencrypted portable storage media and devices	Yes	Full					X	
	11.6	Encryption of PII transmitted over public data-transmission networks	Yes	Full					X	
	11.7	Secure disposal of hardcopy materials	Yes	Full					X	
	11.8	Unique use of user IDs	Yes	Full					X	
	11.9	Records of authorized users	Yes	Full					X	
	11.10	User ID management	Yes	Full					X	
	11.11	Contract measures	Yes	Full		X				
	11.12	Sub-contracted PII processing	Yes	Full		X				
	11.13	Access to data on pre-used data storage space	Yes	Full					X	
12 Privacy compliance	12.1	Geographical location of PII	Yes	Full		X				
	12.2	Intended destination of PII	Yes	Full		X				