

Document Name: Statement of Applicability ("SoA")

Document Number: 11-ISMS

Company Name: Synthesia Limited

Policy Owner(s): Nicolas Barberis

Effective Date: 23/Oct/2025

1. Purpose

To identify, document, and maintain a list of all controls relevant to Synthesia's ISMS and PIMS, the control status, and the reasons for exclusion or implementation.

Note on ISO/IEC 27701 Clause 6 Mapping:

Synthesia Limited's implementation of ISO/IEC 27701:2019 extends its ISO/IEC 27001:2022 Information Security Management System to include Privacy Information Management controls.

The mapping between the ISO/IEC 27001:2022 Annex A controls and the ISO/IEC 27701:2019 Clause 6 requirements (which reference the ISO/IEC 27001:2013 control framework) is maintained **within the Vanta platform**.

This mapping ensures that each ISO 27001:2022 control has been reviewed for privacy applicability and that any corresponding ISO 27701 Clauses 6, 7, and 8 requirements are implemented and tracked within Vanta.

Evidence of this linkage and control status is available within the Vanta Compliance Dashboard.

Version	Date	Description	Author	Approved by
4.2	23-Oct-25	Clarified controls mapping between 27701:2019 and 27001:2022	Nicolas Barberis	Martin Tschammer
4.1	12-Aug-25	Incorporated previous SoAs and Added privacy controls	Nicolas Barberis	Martin Tschammer
4.0	21-Jul-25	Fix minor NC	Nicolas Barberis	Martin Tschammer
3.0	15-Jul-25	Fix minor NC	Nicolas Barberis	Martin Tschammer
2.0	29-May-25	Updated with control applicability and implementation status	Nicolas Barberis	Martin Tschammer
1.0	23-Dec-24	Initial Version	Nicolas Barberis	Martin Tschammer

Statement of Applicability (SOA) - 27001:2022

ISO/IEC 27001:2022 Annex A controls			Justification for control				Status	Implementation	
Clause	Sec	Control Objective/Control	Justification for exclusion	REG	CON	BP			RA
5 Organizational Controls	5.1	Policies for information security			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/ihtowh2e
	5.2	Information security roles and responsibilities				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/6i8ettoj
	5.3	Segregation of duties				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/v4vhjfvh
	5.4	Management responsibilities				Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/69z2hplm
	5.5	Contact with authorities		Yes		Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/dm9a5emm
	5.6	Contact with special interest groups		Yes		Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/5sd6imyl
	5.7	Threat intelligence				Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/mjnl61h4
	5.8	Information security in project management				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/1lbwjsfo
	5.9	Inventory of information and other associated assets				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/duwec37o
	5.10	Acceptable use of information and other associated assets			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/425x42p9
	5.11	Return of assets				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/23wj3sby
	5.12	Classification of information				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/m8r0bfbq
	5.13	Labelling of information		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/5qzssew8
	5.14	Information transfer		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/nogvv3hw
	5.15	Access control		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/v2ygke7o
	5.16	Identity management				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/pggqg813
	5.17	Authentication information				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/5c4gnshh
	5.18	Access rights				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/xtd1rde4
	5.19	Information security in supplier relationships			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/dz91o1f8
	5.20	Addressing information security within supplier agreements			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/v9blvnxj
	5.21	Managing information security in the information and communication technology (ICT) supply chain			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/69evj2pe
	5.22	Monitoring, review and change management of supplier services				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/r7xxjkaz
	5.23	Information security for use of cloud services			Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/zrx7kjgo
	5.24	Information security incident management planning and preparation				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/lggb5g7c
	5.25	Assessment and decision on information security events				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/tp0kv7ho
	5.26	Response to information security incidents		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/qmodzmvq
	5.27	Learning from information security incidents				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/47fxwco1
	5.28	Collection of evidence		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/2qki93x0
	5.29	Information security during disruption			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/x14j0x47
	5.30	ICT readiness for business continuity				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/9t2qdzie
	5.31	Legal, statutory, regulatory and contractual requirements		Yes		Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/p87muahm
	5.32	Intellectual property rights		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/gonqt473
	5.33	Protection of records		Yes		Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/mtbrd5ny
	5.34	Privacy and protection of personal identifiable information (PII)		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/zz8z506w
	5.35	Independent review of information security				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/7pn1c8nr
	5.36	Compliance with policies, rules and standards for information security		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/9yz4l6i3
	5.37	Documented operating procedures				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/o9q0idpd

6 People Controls	6.1	Screening			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/i9up48pp
	6.2	Terms and conditions of employment		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/erq8anhq
	6.3	Information security awareness, education and training			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/h46r2403
	6.4	Disciplinary process				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/zn5t4xav
	6.5	Responsibilities after termination or change of employment			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/15a15zi7
	6.6	Confidentiality or non-disclosure agreements			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/uxoizoh
	6.7	Remote working				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/wka7s1yw
	6.8	Information security event reporting		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/qgkw4h74
7 Physical Controls	7.1	Physical security perimeters				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/c6wnclbs
	7.2	Physical entry				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/c3wvywmg
	7.3	Securing offices, rooms and facilities				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/iyo5i9sf
	7.4	Physical security monitoring				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/uzqttoz9
	7.5	Protecting against physical and environmental threats				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/u1ru3pvv
	7.6	Working in secure areas				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/o3chwj8e
	7.7	Clear desk and clear screen				Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/35g7wvxd
	7.8	Equipment siting and protection				Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/ayjqf12w
	7.9	Security of assets off-premises				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/dzm2dexq
	7.10	Storage media				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/rol0zubt
	7.11	Supporting utilities				Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/qi6b6cr1
	7.12	Cabling security				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/yfm63ole
	7.13	Equipment maintenance				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/wuteta96
	7.14	Secure disposal or re-use of equipment				Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/2yosmk08
	8.1	Inventory of assets				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/2zhexo15
	8.2	Privileged access rights			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/zxjp1hkl
	8.3	Information access restriction				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/mwwihowm
	8.4	Access to source code				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/axwe26mw
	8.5	Secure authentication				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/lubivdgx
	8.6	Capacity management				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/fpa4156z

8 Technological Controls	8.7	Protection against malware				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/4e2usbzc
	8.8	Management of technical vulnerabilities				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/z01cfd6c
	8.9	Configuration management				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/hrnf9oqw
	8.10	Information deletion				Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/kt5aajg7
	8.11	Data masking	All payment processing and handling of Personally Identifiable Information (PII) are outsourced to Stripe, a third-party financial services provider.			N/A		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/fjoy8ov9
	8.12	Data leakage prevention			Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/zv2sb0to
	8.13	Information backup			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/o7ssnlfj
	8.14	Redundancy of information processing facilities				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/oufs0z8u
	8.15	Logging				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/3osnyf10
	8.16	Monitoring activities				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/i7xairas
	8.17	Clock synchronization				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/puuo9pwr
	8.18	Use of privileged utility programs				Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/5o51jc7h
	8.19	Installation of software on operational systems				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/voxc3tc6
	8.20	Networks security				Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/jqyh6kq
	8.21	Security of network services				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/z58ieqyf
	8.22	Segregation of networks				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/k3eiu6n
	8.23	Web filtering				Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/4syp5hfe
	8.24	Use of cryptography				Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/07i98tv1
	8.25	Secure development life cycle				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/c7diea1e
	8.26	Application security requirements				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/m6u2mvnk
	8.27	Secure system architecture and engineering principles				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/27qd09no
	8.28	Secure coding				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/qi8ey5na
	8.29	Security testing in development and acceptance				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/ise32uno
	8.30	Outsourced development				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/9phqpcta
	8.31	Separation of development, test and production environments				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/sbiopz10
	8.32	Change management				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/sbjgr7xz
	8.33	Test information				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/bqnpwe6c
	8.34	Protection of information systems during audit testing				Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27001_2022/controls/dzsae29

Statement of Applicability (SOA) 27018:2019

ISO/IEC 27018:2019 Annex A controls			Justification for exclusion	Justification for control inclusion				Status	Implementation
Clause	Sec	Control Objective/Control		REG	CON	BP	RA		
		Annex A Public cloud PII processor extended controls							
	A.2.1	Obligation to co-operate regarding PII principals' rights			Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/or7q26rk
	A.3.1	Public cloud PII processor's purpose			Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/pxiw5d75
	A.3.2	Public cloud PII processor's commercial use			Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/yfatku2q
	A.5.1	Secure erasure of temporary files			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/4iivfh60
	A.6.1	PII disclosure notification		Yes	Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/akbk50m7
	A.6.2	Recording of PII disclosures		Yes	Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/e2pqsyxz
	A.8.1	Disclosure of sub-contracted PII processing			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/dunhl10l
	A.10.1	Notification of a data breach involving PII		Yes	Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/w74sk5r5
	A.10.2	Retention period for administrative security policies and guidelines		Yes	Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/8y5rpcbl
	A.10.3	PII return, transfer and disposal		Yes	Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/kf1evgcd
	A.11.1	Confidentiality or non-disclosure agreements		Yes		Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/jmnyx4ye
	A.11.2	Restriction of the creation of hardcopy material			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/gy8ktp53
	A.11.3	Control and logging of data restoration		Yes		Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/ce9v0qzv
	A.11.4	Protecting data on storage media leaving the premises		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/etd72izu
	A.11.5	Use of unencrypted portable storage media and devices		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/ins7yeco
	A.11.6	Encryption of PII transmitted over public data-transmission networks		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/0od57oda
	A.11.7	Secure disposal of hardcopy materials			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/xkx99zun
	A.11.8	Unique use of user IDs				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/g4e2ha4x
	A.11.9	Records of authorized users				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/xmeymlzz
	A.11.10	User ID management				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/rcsshbc0
	A.11.11	Contract measures			Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/nbonkv11
	A.11.12	Sub-contracted PII processing			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/xggaoiri
	A.11.13	Access to data on pre-used data storage space				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/6dxi5yz5
	A.12.1	Geographical location of PII			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/50i71fpb
	A.12.2	Intended destination of PII		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27018/controls/kb15ag35

Statement of Applicability (SOA) - 27701:2019

ISO/IEC 27701:2019 Annex A controls			Justification for exclusion	Justification for control inclusion				Status	Implementation
Clause	Sec	Control Objective/Control		REG	CON	BP	RA		
		Annex A PIMS-Specific reference control objectives and controls (PII Controllers)							
	A.7.2.1	Identity and document purpose		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/z87gcsvj
	A.7.2.2	Identify lawful basis		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/oa7t228h
	A.7.2.3	Determine when and how consent is to be obtained		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/omctebnh
	A.7.2.4	Obtain and record consent		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/hcebcq1x
	A.7.2.5	Privacy impact assessment		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/kjxpi7n
	A.7.2.6	Contracts with PII processors		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/5lbu9msz
	A.7.2.7	Joint PII controller		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/8btr0ob8
	A.7.2.8	Records related to processing PII		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/49czer8n
	A.7.3.1	Determining and fulfilling obligations to PII principals		Yes	Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/ipsixmjh
	A.7.3.2	Determining information for PII principals		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/t08poc5w
	A.7.3.3	Providing information to PII principals		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/yzoje4k
	A.7.3.4	Providing mechanism to modify or withdraw consent		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/ypuas5vs
	A.7.3.5	Providing mechanism to object to PII processing		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/7i9w0jnl
	A.7.3.6	Access, correction and/or erasure		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/31hmutio
	A.7.3.7	PII controllers' obligations to inform third parties		Yes	Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/o0klayda
	A.7.3.8	Providing copy of PII processed		Yes	Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/7nce3hqd
	A.7.3.9	Handling requests		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/w9vsut1c
	A.7.3.10	Automated decision making			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/ya42scjz
	A.7.4.1	Limit collection		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/737tqyk2
	A.7.4.2	Limit processing		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/ge28ifka
	A.7.4.3	Accuracy and quality		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/uhqyihem
	A.7.4.4	PII minimization objectives		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/bic5uycb
	A.7.4.5	PII de-identification and deletion at the end of processing		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/yd1y2wjs
	A.7.4.6	Temporary files			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/fcgnh8op
	A.7.4.7	Retention		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/45wdj2b5
	A.7.4.8	Disposal		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/2tsudku4
	A.7.4.9	PII transmission controls			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/x17s773n
	A.7.5.1	Identify basis for PII transfer between jurisdictions		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/eih6h90t

	A.7.5.2	Countries and international organizations to which PII can be transferred		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/m9fg7ii7
	A.7.5.3	Records of transfer of PII		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/36vvz7kr
	A.7.5.4	Records of PII disclosure to third parties		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/cc3b20w5
		Annex B PIMS-Specific reference control objectives and controls (PII Processors)							
	B.8.2.1	Customer agreement			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/m5tp27qr
	B.8.2.2	Organization's purposes		Yes	Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/2e1r18ot
	B.8.2.3	Marketing and advertising use		Yes	Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/l6wdnb7t
	B.8.2.4	Infringing instruction		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/qcgearzo
	B.8.2.5	Customer obligations			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/mjjxi2z
	B.8.2.6	Records related to processing PII		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/75jqpc1c
	B.8.3.1	Obligations to PII principals		Yes	Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/k5v6jmby
	B.8.4.1	Temporary files				Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/2xls1y8d
	B.8.4.2	Return, transfer or disposal of PII			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/zfpxgs8e
	B.8.4.3	PII transmission controls		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/wrp884ym
	B.8.5.1	Basis for PII transfer between jurisdictions		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/208j2wqu
	B.8.5.2	Countries and international organizations to which PII can be transferred		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/0h1n3wi4
	B.8.5.3	Records of transfer of PII		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/wi8j9who
	B.8.5.4	Notification of PII disclosure requests		Yes	Yes	Yes		Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/al9vv36i
	B.8.5.5	Legally binding PII disclosures		Yes	Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/b9abtq7i
	B.8.5.6	Disclosure of subcontractors used to process PII			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/f42wwgwm
	B.8.5.7	Engagement of a subcontractor to process PII			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/63mj68jr
	B.8.5.8	Change of subcontractor to process PII			Yes	Yes	Yes	Implemented	Implementation is tracked within the Vanta application: https://app.vanta.com/compliance/iso27701/controls/o2b2fv17