

Flexera
Statement of Applicability

Internal

DOCUMENT CONTROL

DOCUMENT NAME: Statement of Applicability
DOCUMENT ID: CPL-20-03
DOCUMENT OWNER: Sahil Gupta
APPROVED BY: Conal Gallagher
LAST REVIEWED Date: 2025/08/04

TYPE: Level 1 - Core Document
ISSUED BY: Flexera Software LLC
NEXT REVIEW DATE: 2026/08/04

VERSION HISTORY:

Version	Description	Revision Date	Review Date	Reviewer	Approver
version 1.0	Initial document		2022-07-19	Sherril Robbins	Conal Gallagher
version 1.1	Changed owner, added document control information		2022-09-06	Sherril Robbins	Conal Gallagher
version 1.2	Updated Justification for Inclusion on all Annex A controls		2023-07-20	Kartik Raturi	Conal Gallagher
version 2.0	Updated for ISO 27001 2022	2024-07-10	2024-07-10	Sahil Gupta	Conal Gallagher
version 2.1	Annual Review	2025-08-04	2025-08-04	Sahil Gupta	Conal Gallagher

SECURITY CLASSIFICATION: Internal

Statement of Applicability

C: confidentiality, I: integrity, A: availability, LR: legal requirement, CO: contractual obligations, BP: adopted best practices, RRA: results of risk assessment

ISO/IEC 27001:2022 Control Number	Control Title	Control	In Scope	Out of Scope	Attribute values	Control Implementation Status	Justification for Inclusion				Justification for Exclusion
							LR	CO	BP	RRA	
5.1	Policies for information Security	Information security policy and topic-specific policies shall be defined, approved by management, published, communicated to and acknowledged by relevant personnel and relevant interested parties, and reviewed at planned intervals and if significant changes occur.	X		C, I, A	Implemented			X		
5.2	Information security roles and responsibilities	Information security roles and responsibilities shall be defined and allocated according to the organization needs.	X		C, I, A	Implemented			X		
5.3	Segregation of duties	Conflicting duties and conflicting areas of responsibility shall be segregated.	X		C, I, A	Implemented			X		
5.4	Management responsibilities	Management shall require all personnel to apply information security in accordance with the established information security policy, topic-specific policies and procedures of the organization.	X		C, I, A	Implemented			X		
5.5	Contact with authorities	The organization shall establish and maintain contact with relevant authorities.	X		C, I, A	Implemented			X		
5.6	Contact with special interest groups	The organization shall establish and maintain contact with special interest groups or other specialist security forums and professional associations.	X		C, I, A	Implemented			X		
5.7	Threat intelligence	Information relating to information security threats shall be collected and analyzed to produce threat intelligence.	X		C, I, A	Implemented			X	X	
5.8	Information security in project management	Information security shall be integrated into project management.	X		C, I, A	Implemented			X		
5.9	Inventory of information and other associated assets	An inventory of information and other associated assets, including owners, shall be developed and maintained.	X		C, I, A	Implemented			X		
5.10	Acceptable use of information and other associated assets	Rules for the acceptable use and procedures for handling information and other associated assets shall be identified, documented and implemented.	X		C, I, A	Implemented			X		
5.11	Return of assets	Personnel and other interested parties as appropriate shall return all the organization's assets in their possession upon change or termination of their employment, contract or agreement.	X		C, I, A	Implemented			X		
5.12	Classification of information	Information shall be classified according to the information security needs of the organization based on confidentiality, integrity, availability and relevant interested party requirements.	X		C, I, A	Implemented			X		
5.13	Labelling of information	An appropriate set of procedures for information labelling shall be developed and implemented in accordance with the information classification scheme adopted by the organization.	X		C, I, A	Implemented			X		
5.14	Information transfer	Information transfer rules, procedures, or agreements shall be in place for all types of transfer facilities within the organization and between the organization and other parties.	X		C, I, A	Implemented			X		
5.15	Access control	Rules to control physical and logical access to information and other associated assets shall be established and implemented based on business and information security requirements.	X		C, I, A	Implemented			X		
5.16	Identity management	The full life cycle of identities shall be managed.	X		C, I, A	Implemented			X		
5.17	Authentication information	Allocation and management of authentication information shall be controlled by a management process, including advising personnel on the appropriate handling of authentication information.	X		C, I, A	Implemented			X		

5.18	Access rights	Access rights to information and other associated assets shall be provisioned, reviewed, modified and removed in accordance with the organization's topic-specific policy on and rules for access control.	X		C, I, A	Implemented			X	
5.19	Information security in supplier relationships	Processes and procedures shall be defined and implemented to manage the information security risks associated with the use of supplier's products or services.	X		C, I, A	Implemented			X	
5.20	Addressing information security within supplier agreements	Relevant information security requirements shall be established and agreed with each supplier based on the type of supplier relationship.	X		C, I, A	Implemented			X	
5.21	Managing information security in the information and communication technology (ICT) supply chain	Processes and procedures shall be defined and implemented to manage the information security risks associated with the ICT products and services supply chain.	X		C, I, A	Implemented			X	
5.22	Monitoring, review and change management of supplier services	The organization shall regularly monitor, review, evaluate and manage change in supplier information security practices and service delivery.	X		C, I, A	Implemented			X	
5.23	Information security for use of cloud services	Processes for acquisition, use, management and exit from cloud services shall be established in accordance with the organization's information security requirements.	X		C, I, A	Implemented			X	X
5.24	Information security incident management planning and preparation	The organization shall plan and prepare for managing information security incidents by defining, establishing and communicating information security incident management processes, roles and responsibilities.	X		C, I, A	Implemented			X	
5.25	Assessment and decision on information security events	The organization shall assess information security events and decide if they are to be categorized as information security incidents.	X		C, I, A	Implemented			X	
5.26	Response to information security incidents	Information security incidents shall be responded to in accordance with the documented procedures.	X		C, I, A	Implemented			X	
5.27	Learning from information security incidents	Knowledge gained from information security incidents shall be used to strengthen and improve the information security controls.	X		C, I, A	Implemented			X	
5.28	Collection of evidence	The organization shall establish and implement procedures for the identification, collection, acquisition and preservation of evidence related to information security events.	X		C, I, A	Implemented			X	
5.29	Information security during disruption	The organization shall plan how to maintain information security at an appropriate level during disruption.	X		C, I, A	Implemented			X	
5.30	ICT readiness for business continuity	ICT readiness shall be planned, implemented, maintained and tested based on business continuity objectives and ICT continuity requirements.	X		A	Implemented			X	X
5.31	Legal, statutory, regulatory and contractual requirements	Legal, statutory, regulatory and contractual requirements relevant to information security and the organization's approach to meet these requirements shall be identified, documented and kept up to date.	X		C, I, A	Implemented			X	
5.32	Intellectual property rights	The organization shall implement appropriate procedures to protect intellectual property rights.	X		C, I, A	Implemented			X	
5.33	Protection of records	Records shall be protected from loss, destruction, falsification, unauthorized access and unauthorized release.	X		C, I, A	Implemented			X	
5.34	Privacy and protection of personal identifiable information (PII)	The organization shall identify and meet the requirements regarding the preservation of privacy and protection of PII according to applicable laws and regulations and contractual requirements.	X		C, I, A	Implemented			X	
5.35	Independent review of information security	The organization's approach to managing information security and its implementation including people, processes and technologies shall be reviewed independently at planned intervals, or when significant changes occur.	X		C, I, A	Implemented			X	
5.36	Compliance with policies, rules and standards for information security	Compliance with the organization's information security policy, topic-specific policies, rules and standards shall be regularly reviewed.	X		C, I, A	Implemented			X	
5.37	Documented operating procedures	Operating procedures for information processing facilities shall be documented and made available to personnel who need them.	X		C, I, A	Implemented			X	

6.1	Screening	Background verification checks on all candidates to become personnel shall be carried out prior to joining the organization and on an ongoing basis taking into consideration applicable laws, regulations and ethics and be proportional to the business requirements, the classification of the information to be accessed and the perceived risks.	X		C, I, A	Implemented			X		
6.2	Terms and conditions of employment	The employment contractual agreements shall state the personnel's and the organization's responsibilities for information security.	X		C, I, A	Implemented			X		
6.3	Information security awareness, education and training	Personnel of the organization and relevant interested parties shall receive appropriate information security awareness, education and training and regular updates of the organization's information security policy, topic-specific policies and procedures, as relevant for their job function.	X		C, I, A	Implemented			X		
6.4	Disciplinary process	A disciplinary process shall be formalized and communicated to take actions against personnel and other relevant interested parties who have committed an information security policy violation.	X		C, I, A	Implemented			X		
6.5	Responsibilities after termination or change of employment	Information security responsibilities and duties that remain valid after termination or change of employment shall be defined, enforced and communicated to relevant personnel and other interested parties.	X		C, I, A	Implemented			X		
6.6	Confidentiality or non-disclosure agreements	Confidentiality or non-disclosure agreements reflecting the organization's needs for the protection of information shall be identified, documented, regularly reviewed and signed by personnel and other relevant interested parties.	X		C, I, A	Implemented			X		
6.7	Remote working	Security measures shall be implemented when personnel are working remotely to protect information accessed, processed or stored outside the organization's premises.	X		C, I, A	Implemented			X		
6.8	Information security event reporting	The organization shall provide a mechanism for personnel to report observed or suspected information security events through appropriate channels in a timely manner.	X		C, I, A	Implemented			X		
7.1	Physical security perimeters	Security perimeters shall be defined and used to protect areas that contain information and other associated assets.	X		C, I, A	Implemented			X		
7.2	Physical entry	Secure areas shall be protected by appropriate entry controls and access points.	X		C, I, A	Implemented			X		
7.3	Securing offices, rooms and facilities	Physical security for offices, rooms and facilities shall be designed and implemented.	X		C, I, A	Implemented			X		
7.4	Physical security monitoring	Premises shall be continuously monitored for unauthorized physical access.	X		C, I, A	Implemented			X	X	
7.5	Protecting against physical and environmental threats	Protection against physical and environmental threats, such as natural disasters and other intentional or unintentional physical threats to infrastructure shall be designed and implemented.	X		C, I, A	Implemented			X		
7.6	Working in secure areas	Security measures for working in secure areas shall be designed and implemented.	X		C, I, A	Implemented			X		
7.7	Clear desk and clear screen	Clear desk rules for papers and removable storage media and clear screen rules for information processing facilities shall be defined and appropriately enforced.	X		C, I, A	Implemented			X		
7.8	Equipment siting and protection	Equipment shall be sited securely and protected.	X		C, I, A	Implemented			X		
7.9	Security of assets off-premises	Off-site assets shall be protected.	X		C, I, A	Implemented			X		
7.10	Storage media	Storage media shall be managed through their life cycle of acquisition, use, transportation and disposal in accordance with the organization's classification scheme and handling requirements.	X		C, I, A	Implemented			X		
7.11	Supporting utilities	Information processing facilities shall be protected from power failures and other disruptions caused by failures in supporting utilities.	X		I, A	Implemented			X		
7.12	Cabling security	Cables carrying power, data or supporting information services shall be protected from interception, interference or damage.	X		C, I, A	Implemented			X		
7.13	Equipment maintenance	Equipment shall be maintained correctly to ensure availability, integrity and confidentiality of information.	X		C, I, A	Implemented			X		

7.14	Secure disposal or re-use of equipment	Items of equipment containing storage media shall be verified to ensure that any sensitive data and licensed software has been removed or securely overwritten prior to disposal or re-use.	X		C, I, A	Implemented			X	
8.1	User endpoint devices	Information stored on, processed by or accessible via user endpoint devices shall be protected.	X		C, I, A	Implemented			X	
8.2	Privileged access rights	The allocation and use of privileged access rights shall be restricted and managed.	X		C, I, A	Implemented			X	
8.3	Information access restriction	Access to information and other associated assets shall be restricted in accordance with the established topic-specific policy on access control.	X		C, I, A	Implemented			X	
8.4	Access to source code	Read and write access to source code, development tools and software libraries shall be appropriately managed.	X		C, I, A	Implemented			X	
8.5	Secure authentication	Secure authentication technologies and procedures shall be implemented based on information access restrictions and the topic-specific policy on access control.	X		C, I, A	Implemented			X	
8.6	Capacity management	The use of resources shall be monitored and adjusted in line with current and expected capacity requirements.	X		I, A	Implemented			X	
8.7	Protection against malware	Protection against malware shall be implemented and supported by appropriate user awareness.	X		C, I, A	Implemented			X	
8.8	Management of technical vulnerabilities	Information about technical vulnerabilities of information systems in use shall be obtained, the organization's exposure to such vulnerabilities shall be evaluated and appropriate measures shall be taken.	X		C, I, A	Implemented			X	
8.9	Configuration management	Configurations, including security configurations, of hardware, software, services and networks shall be established, documented, implemented, monitored and reviewed.	X		C, I, A	Implemented			X	X
8.10	Information deletion	Information stored in information systems, devices or in any other storage media shall be deleted when no longer required.	X		C, I, A	Implemented			X	X
8.11	Data masking	Data masking shall be used in accordance with the organization's topic-specific policy on access control and other related topic-specific policies, and business requirements, taking applicable legislation into consideration.	X		C, I, A	Implemented			X	X
8.12	Data leakage prevention	Data leakage prevention measures shall be applied to systems, networks and any other devices that process, store or transmit sensitive information.	X		C, I, A	Implemented			X	X
8.13	Information backup	Backup copies of information, software and systems shall be maintained and regularly tested in accordance with the agreed topic-specific policy on backup.	X		I, A	Implemented			X	
8.14	Redundancy of information processing facilities	Information processing facilities shall be implemented with redundancy sufficient to meet availability requirements.	X		A	Implemented			X	
8.15	Logging	Logs that record activities, exceptions, faults and other relevant events shall be produced, stored, protected and analyzed.	X		C, I, A	Implemented			X	
8.16	Monitoring activities	Networks, systems and applications shall be monitored for anomalous behavior and appropriate actions taken to evaluate potential information security incidents.	X		C, I, A	Implemented			X	X
8.17	Clock synchronization	The clocks of information processing systems used by the organization shall be synchronized to approved time sources.	X		I	Implemented			X	
8.18	Use of privileged utility programs	The use of utility programs that can be capable of overriding system and application controls shall be restricted and tightly controlled.	X		C, I, A	Implemented			X	
8.19	Installation of software on operational systems	Procedures and measures shall be implemented to securely manage software installation on operational systems.	X		C, I, A	Implemented			X	
8.20	Networks security	Networks and network devices shall be secured, managed and controlled to protect information in systems and applications.	X		C, I, A	Implemented			X	
8.21	Security of network services	Security mechanisms, service levels and service requirements of network services shall be identified, implemented and monitored.	X		C, I, A	Implemented			X	
8.22	Segregation of networks	Groups of information services, users and information systems shall be segregated in the organization's networks.	X		C, I, A	Implemented			X	
8.23	Web filtering	Access to external websites shall be managed to reduce exposure to malicious content.	X		C, I, A	Implemented			X	X
8.24	Use of cryptography	Rules for the effective use of cryptography, including cryptographic key management, shall be defined and implemented.	X		C, I, A	Implemented			X	

8.25	Secure development life cycle	Rules for the secure development of software and systems shall be established and applied.	X		C, I, A	Implemented			X		
8.26	Application security requirements	Information security requirements shall be identified, specified and approved when developing or acquiring applications.	X		C, I, A	Implemented			X		
8.27	Secure system architecture and engineering principles	Principles for engineering secure systems shall be established, documented, maintained and applied to any information system development activities.	X		C, I, A	Implemented			X		
8.28	Secure coding	Secure coding principles shall be applied to software development.	X		C, I, A	Implemented			X	X	
8.29	Security testing in development and acceptance	Security testing processes shall be defined and implemented in the development life cycle.	X		C, I, A	Implemented			X		
8.30	Outsourced development	The organization shall direct, monitor and review the activities related to outsourced system development.		X	C, I, A	Not Implemented					Flexera does not outsource product development
8.31	Separation of development, test and production environments	Development, testing and production environments shall be separated and secured.	X		C, I, A	Implemented			X		
8.32	Change management	Changes to information processing facilities and information systems shall be subject to change management procedures.	X		C, I, A	Implemented			X		
8.33	Test information	Test information shall be appropriately selected, protected and managed.	X		C, I, A	Implemented			X		
8.34	Protection of information systems during audit testing	Audit tests and other assurance activities involving assessment of operations systems shall be planned agreed between the tester and appropriate management.	X		C, I, A	Implemented			X		