



SOC 2 - Trust Services Criteria

SOC 2 - Trust Services Criteria - Policies and Procedures



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Prepared for: Client Company

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326	SOC 2 - Trust Services Criteria P4.2.2 - Protects Personal Information [P][C]
327	SOC 2 - Trust Services Criteria P4.3 - Disposal
328	SOC 2 - Trust Services Criteria P4.3.1 - Captures, Identifies, and Flags Requests for Deletion [P][C]
329	SOC 2 - Trust Services Criteria P4.3.2 - Disposes of, Destroys, and Redacts Personal Information [P][C]
330	SOC 2 - Trust Services Criteria P4.3.3 - Destroys Personal Information [P][C]
331	SOC 2 - Trust Services Criteria P5.0 - Privacy Criteria Related to Access
332	SOC 2 - Trust Services Criteria P5.1 - Access
333	SOC 2 - Trust Services Criteria P5.1.1 - Responds to Data Controller Requests [P]
334	SOC 2 - Trust Services Criteria P5.1.2 - Authenticates Data Subjects' Identity [P][C]
335	SOC 2 - Trust Services Criteria P5.1.3 - Permits Data Subjects Access to Their Personal Information [P][C]
336	SOC 2 - Trust Services Criteria P5.1.4 - Provides Understandable Personal Information Within Reasonable Time [P][C]
337	SOC 2 - Trust Services Criteria P5.1.5 - Informs Data Subjects If Access Is Denied [P][C]
338	SOC 2 - Trust Services Criteria P5.2 - Corrections and Amendments
339	SOC 2 - Trust Services Criteria P5.2.1 - Responds to Data Controller Requests [P]
340	SOC 2 - Trust Services Criteria P5.2.2 - Communicates Denial of Access Requests [P][C]
341	SOC 2 - Trust Services Criteria P5.2.3 - Permits Data Subjects to Update or Correct Personal Information [P][C]



342	SOC 2 - Trust Services Criteria P5.2.4 - Communicates Denial of Correction Requests [P][C]
343	SOC 2 - Trust Services Criteria P6.0 - Privacy Criteria Related to Disclosure and Notification
344	SOC 2 - Trust Services Criteria P6.1 - Third Parties
345	SOC 2 - Trust Services Criteria P6.1.1 - Communicates Privacy Policies to Third Parties [P][C]
346	SOC 2 - Trust Services Criteria P6.1.2 - Discloses Personal Information Only When Appropriate [P][C]
347	SOC 2 - Trust Services Criteria P6.1.3 - Discloses Personal Information Only to Appropriate Third Parties [P][C]
348	SOC 2 - Trust Services Criteria P6.1.4 - Discloses Information to Third Parties for New Purposes and Uses [P][C]
349	SOC 2 - Trust Services Criteria P6.2 - Authorized Disclosures
350	SOC 2 - Trust Services Criteria P6.2.1 - Creates and Retains Record of Authorized Disclosures [P][C]
351	SOC 2 - Trust Services Criteria P6.3 - Unauthorized Disclosures
352	SOC 2 - Trust Services Criteria P6.3.1 - Creates and Retains Record of Detected or Reported Unauthorized Disclosures [P] [C]
353	SOC 2 - Trust Services Criteria P6.4 - Vendor and Third Party Privacy Commitments
354	SOC 2 - Trust Services Criteria P6.4.1 - Evaluates Third-Party Compliance With Privacy Commitments [P][C]
355	SOC 2 - Trust Services Criteria P6.4.2 - Remediates Misuse of Personal Information by a Third Party [P][C]
356	SOC 2 - Trust Services Criteria P6.4.3 - Obtains Commitments to Report Unauthorized Disclosures [P][C]
357	SOC 2 - Trust Services Criteria P6.5 - Vendor and Third Party Unauthorized Disclosures
358	SOC 2 - Trust Services Criteria P6.5.1 - Remediates Misuse of Personal Information by a Third Party [P][C]
359	SOC 2 - Trust Services Criteria P6.5.2 - Reports Actual or Suspected Unauthorized Disclosures [P][C]
360	SOC 2 - Trust Services Criteria P6.6 - Breach Notification
361	SOC 2 - Trust Services Criteria P6.6.1 - Identifies Reporting Requirements [P][C]
362	SOC 2 - Trust Services Criteria P6.6.2 - Provides Notice of Breaches and Incidents [P][C]
363	SOC 2 - Trust Services Criteria P6.7 - Accounting of Storage and Disclosure
364	SOC 2 - Trust Services Criteria P6.7.1 - Responds to Data Controller Requests [P]



365	SOC 2 - Trust Services Criteria P6.7.2 - Identifies Types of Personal Information and Handling Process [P][C]
366	SOC 2 - Trust Services Criteria P6.7.3 - Captures, Identifies, and Communicates Requests for Information [P][C]
367	SOC 2 - Trust Services Criteria P7.0 - Privacy Criteria Related to Quality
368	SOC 2 - Trust Services Criteria P7.1 - Data Quality
369	SOC 2 - Trust Services Criteria P7.1.1 - Ensures Accuracy and Completeness of Personal Information [P][C] —
370	SOC 2 - Trust Services Criteria P7.1.2 - Ensures Relevance of Personal Information [P][C]
371	SOC 2 - Trust Services Criteria P8.0 - Privacy Criteria Related to Monitoring and Enforcement
372	SOC 2 - Trust Services Criteria P8.1 - Communications
373	SOC 2 - Trust Services Criteria P8.1.1 - Communicates to Data Subjects or Data Controllers [P][C]
374	SOC 2 - Trust Services Criteria P8.1.2 - Addresses Inquiries, Complaints, and Disputes [P][C]
375	SOC 2 - Trust Services Criteria P8.1.3 - Documents and Communicates Dispute Resolution and Recourse [P][C]
376	SOC 2 - Trust Services Criteria P8.1.4 - Documents and Reports Compliance Review Results [P][C]
377	SOC 2 - Trust Services Criteria P8.1.5 - Documents and Reports Instances of Noncompliance [P][C]
378	SOC 2 - Trust Services Criteria P8.1.6 - Performs Ongoing Monitoring [P][C]
379	SOC 2 - Trust Services Criteria PI1.1 - Additional Criteria for Processing Integrity (Over the Provision of Services or the Production, Manufacturing, or Distribution of Goods)
380	SOC 2 - Trust Services Criteria PI1.1.1 - Identifies Functional and Nonfunctional Requirements and Information Specifications
381	SOC 2 - Trust Services Criteria PI1.1.2 - Defines Data Necessary to Support a Product or Service
382	SOC 2 - Trust Services Criteria PI1.1.3 - Data Definition Components
383	SOC 2 - Trust Services Criteria PI1.1.4 - Data Definition Accuracy
384	SOC 2 - Trust Services Criteria PI1.1.5 - Data Description
385	SOC 2 - Trust Services Criteria PI1.2 - Defines Information Necessary to Support the Use of a Good or Product
386	SOC 2 - Trust Services Criteria PI1.2.1 - Defines Characteristics of Processing Inputs
387	SOC 2 - Trust Services Criteria PI1.2.3 - Evaluates Processing Inputs



388	SOC 2 - Trust Services Criteria PI1.2.4 - Creates and Maintains Records of System Inputs
389	SOC 2 - Trust Services Criteria PI1.3 - System Processing Policies & Procedures
390	SOC 2 - Trust Services Criteria PI1.3.1 - Defines Processing Specifications
391	SOC 2 - Trust Services Criteria PI1.3.2 - Defines Processing Activities
392	SOC 2 - Trust Services Criteria PI1.3.3 - Detects and Corrects Processing or Production Activity Errors
393	SOC 2 - Trust Services Criteria PI1.3.4 - Records System Processing Activities
394	SOC 2 - Trust Services Criteria PI1.3.5 - Processes Inputs
395	SOC 2 - Trust Services Criteria PI1.4 - Process Output Policies and Procedures
396	SOC 2 - Trust Services Criteria PI1.4.1 - Protects Output
397	SOC 2 - Trust Services Criteria PI1.4.2 - Distributes Output Only to Intended Parties
398	SOC 2 - Trust Services Criteria PI1.4.3 - Distributes Output Completely and Accurately
399	SOC 2 - Trust Services Criteria PI1.4.4 - Creates and Maintains Records of System Output Activities
400	SOC 2 - Trust Services Criteria PI1.5 - Storage Policies and Procedures
401	SOC 2 - Trust Services Criteria PI1.5.1 - Protects Stored Items
402	SOC 2 - Trust Services Criteria PI1.5.2 - Archives and Protects System Records
403	SOC 2 - Trust Services Criteria PI1.5.3 - Stores Data Completely and Accurately
404	SOC 2 - Trust Services Criteria PI1.5.4 - Creates and Maintains Records of System Storage Activities



Purpose

SOC for Service Organizations are internal control reports on the services provided by a service organization providing valuable information that users need to assess and address the risks associated with an outsourced service. SOC is a standard of the American Institute of Certified Public Accountants (AICPA) and audits must be performed by CPA firms.

The Trust Services Criteria is to be used when evaluating the suitability of the design and operating effectiveness of controls relevant to the security, availability, or processing integrity of information and systems used to provide products or services, or the confidentiality or privacy of information processed by the systems used to provide products or services at an entity, a division, or an operating unit of an entity.

In addition, the Trust Services Criteria may be used when evaluating the design and operating effectiveness of controls relevant to the security, availability, processing integrity, confidentiality or privacy of a particular type of information processed by one or more of an entity's systems or one or more systems used to support a particular function within the entity.

The Trust Services Criteria set forth the outcomes that an entity's controls should ordinarily meet to achieve the entity's unique objectives. Therefore, the Trust Services Criteria are intended to be used for evaluation and reporting, regardless of the specific controls implemented by management. This contrasts with the approach taken by process and controls frameworks, which mandate that the entity implement a specific set of controls. The Trust Services Criteria recognize that there is no specific set of processes and controls that can effectively mitigate all the unique threats, vulnerabilities, and risks that entities face.

Instead, each entity is responsible for establishing its own objectives, assessing the unique risks that threaten the achievement of those objectives, and implementing processes and controls to mitigate those risks to acceptable levels. Because each entity is unique, applying the Trust Services Criteria in actual situations requires judgment.

Source: AICPS TSP Section 100 2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy (with Revised Points of Focus 2022)



Scope

This policy applies to the workforce members and vendors of entities that are third-party outsourced service organizations.



Sanctions/Compliance

Failure to comply with this or any other security policy will result in disciplinary actions as per the Sanction Policy. Legal actions also may be taken for violations of applicable regulations and laws.

SOC 2 - Trust Services Criteria A1.1 - Additional Criteria for Availability

SOC 2 - Trust Services Criteria	Other Requirements
A1.1	N/A
Additional Criteria for Availability	

Policy

The organization will implement internal controls to satisfy the following requirement:

The entity maintains, monitors, and evaluates current processing capacity and use of system components (infrastructure, data, and software) to manage capacity demand and to enable the implementation of additional capacity to help meet its objectives.

Guidance

The entity must maintain, monitor, and evaluate current processing capacity and use of system components (infrastructure, data, and software) to manage capacity demand and to enable the implementation of additional capacity to help meet its objectives. Laws, regulations, contracts, and insurance policies should be reviewed for specific requirements.

Responsibilities

The Security Officer is responsible for ensuring the implementation of this policy.

Related Internal Controls

- TSC-A1.1 - Availability: Maintain, monitor, and evaluate current processing capacity and use of system components (infrastructure, data, and software) to manage capacity demand and to enable the implementation of additional capacity to help meet its objectives.

Procedure

- o Maintain, monitor, and evaluate current processing capacity and use of system components (infrastructure, data, and software) to manage capacity demand and to enable the implementation of additional capacity to help meet its objectives.

References

- SOC for Service Organizations - <https://us.aicpa.org/interestareas/frc/assuranceadvisoryservices/socforserviceorganizations>
- Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy with 2022 Revised Points of Focus - <https://www.aicpa-cima.com/resources/download/2017-trust-services-criteria-with-revised-points-of-focus-2022>
- SOC 2 Frequently Asked Questions - <https://us.aicpa.org/content/dam/aicpa/interestareas/frc/assuranceadvisoryservices/downloadabledocuments/56175896-2011-04977-soc-2-commonly-asked-questions-final.pdf>

SOC 2 - Trust Services Criteria A1.1.1 - Measures Current Usage

SOC 2 - Trust Services Criteria	Other Requirements
A1.1.1	N/A
Measures Current Usage	

Policy

The organization will implement internal controls to satisfy the following requirement:

The use of the system components is measured to establish a baseline for capacity management and to use when evaluating the risk of impaired availability due to capacity constraints.

Guidance

The use of the system components must be measured to establish a baseline for capacity management and to use when evaluating the risk of impaired availability due to capacity constraints. Laws, regulations, contracts, and insurance policies should be reviewed for specific requirements.

Responsibilities

The Security Officer is responsible for ensuring the implementation of this policy.

Related Internal Controls

- TSC-A1.1.1 - Usage Measurement: Measure the use of the system components to establish a baseline for capacity management and to use when evaluating the risk of impaired availability due to capacity constraints.

Procedure

- o Measure the use of the system components to establish a baseline for capacity management and to use when evaluating the risk of impaired availability due to capacity constraints.

References

- SOC for Service Organizations - <https://us.aicpa.org/interestareas/frc/assuranceadvisoryservices/socforserviceorganizations>
- Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy with 2022 Revised Points of Focus - <https://www.aicpa-cima.com/resources/download/2017-trust-services-criteria-with-revised-points-of-focus-2022>
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SOC 2 - Trust Services Criteria A1.1.2 - Forecasts Capacity

SOC 2 - Trust Services Criteria	Other Requirements
A1.1.2	N/A
Forecasts Capacity	

Policy

The organization will implement internal controls to satisfy the following requirement:

The expected average and peak use of system components is forecasted and compared to system capacity and associated tolerances. Forecasting considers capacity in the event of the failure of system components that constrain capacity.

Guidance

The expected average and peak use of system components is forecasted and compared to system capacity and associated tolerances. Forecasting considers capacity in the event of the failure of system components that constrain capacity.

Responsibilities

The Security Officer is responsible for ensuring the implementation of this policy.

Related Internal Controls

- TSC-A1.1.2 - Capacity Forecasts: Forecast the expected average and peak use of system components and compared e forecast to system capacity and associated tolerances. Consider capacity in the event of the failure of system components that constrain capacity.

Procedure

- o Forecast the expected average and peak use of system components and compared e forecast to system capacity and associated tolerances. Consider capacity in the event of the failure of system components that constrain capacity.

References

- SOC for Service Organizations - <https://us.aicpa.org/interestareas/frc/assuranceadvisoryservices/socforserviceorganizations>
- Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy with 2022 Revised Points of Focus - <https://www.aicpa-cima.com/resources/download/2017-trust-services-criteria-with-revised-points-of-focus-2022>
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SOC 2 - Trust Services Criteria A1.1.3 - Makes Changes Based on Forecasts

SOC 2 - Trust Services Criteria	Other Requirements
A1.1.3 Makes Changes Based on Forecasts	N/A

Policy

The organization will implement internal controls to satisfy the following requirement:

The system change management process is initiated when forecasted usage exceeds capacity tolerances.

Guidance

The system change management process must be initiated when forecasted usage exceeds capacity tolerances. Laws, regulations, contracts, and insurance policies should be reviewed for specific requirements.

Responsibilities

The Security Officer is responsible for ensuring the implementation of this policy.

Related Internal Controls

- TSC-A1.1.3 - Capacity Limits: Initiate the system change management process when forecasted usage exceeds capacity tolerances.

Procedure

- o Initiate the system change management process when forecasted usage exceeds capacity tolerances.

References

- SOC for Service Organizations - <https://us.aicpa.org/interestareas/frc/assuranceadvisoryservices/socforserviceorganizations>
- Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy with 2022 Revised Points of Focus - <https://www.aicpa-cima.com/resources/download/2017-trust-services-criteria-with-revised-points-of-focus-2022>
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SOC 2 - Trust Services Criteria A1.2 - Environmental Protections

SOC 2 - Trust Services Criteria	Other Requirements
A1.2	N/A
Environmental Protections	

Policy

The organization will implement internal controls to satisfy the following requirement:

The entity authorizes, designs, develops or acquires, implements, operates, approves, maintains, and monitors environmental protections, software, data back-up processes, and recovery infrastructure to meet its objectives.

Guidance

The entity must authorize, design, develop or acquire, implement, operate, approve, maintain, and monitor environmental protections, software, data back-up processes, and recovery infrastructure to meet its objectives. Laws, regulations, contracts, and insurance policies should be reviewed for specific requirements.

Responsibilities

The Security Officer is responsible for ensuring the implementation of this policy.

Related Internal Controls

- TSC-A1.2 - Environmental Protections: Authorize, design, develop or acquire, implement, operate, approve, maintain, and monitor environmental protections, software, data back-up processes, and recovery infrastructure to meet its objectives.

Procedure

- o Authorize, design, develop or acquire, implement, operate, approve, maintain, and monitor environmental protections, software, data back-up processes, and recovery infrastructure to meet its objectives.

References

- SOC for Service Organizations - <https://us.aicpa.org/interestareas/frc/assuranceadvisoryservices/socforserviceorganizations>
- Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy with 2022 Revised Points of Focus - <https://www.aicpa-cima.com/resources/download/2017-trust-services-criteria-with-revised-points-of-focus-2022>
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SOC 2 - Trust Services Criteria A1.2.1 - Identifies Environmental Threats

SOC 2 - Trust Services Criteria	Other Requirements
A1.2.1	N/A
Identifies Environmental Threats	

Policy

The organization will implement internal controls to satisfy the following requirement:

As part of the risk assessment process, management identifies environmental threats that could impair the availability of the system, including threats resulting from adverse weather, failure of environmental control systems, electrical discharge, fire, and water.

Guidance

As part of the risk assessment process, management must identify environmental threats that could impair the availability of the system, including threats resulting from adverse weather, failure of environmental control systems, electrical discharge, fire, and water. Laws, regulations, contracts, and insurance policies should be reviewed for specific requirements.

Responsibilities

The Security Officer is responsible for ensuring the implementation of this policy.

Related Internal Controls

- TSC-A1.2.1 - Environmental Threat Identification: As part of the risk assessment process, ensure that management identifies environmental threats that could impair the availability of the system, including threats resulting from adverse weather, failure of environmental control systems, electrical discharge, fire, and water.

Procedure

- o As part of the risk assessment process, ensure that management identifies environmental threats that could impair the availability of the system, including threats resulting from adverse weather, failure of environmental control systems, electrical discharge, fire, and water.

References

- SOC for Service Organizations - <https://us.aicpa.org/interestareas/frc/assuranceadvisoryservices/socforserviceorganizations>
- Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy with 2022 Revised Points of Focus - <https://www.aicpa-cima.com/resources/download/2017-trust-services-criteria-with-revised-points-of-focus-2022>
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