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Security Measures

TECHNICAL AND ORGANIZATIONAL MEASURES IMPLEMENTED BY SBJ

Technical Measures to Ensure Security of Processing	
1. Inventory and Control of Hardware Assets	Actively manage all hardware devices on the network so that only authorized devices are given access, and unauthorized and unmanaged devices are found and prevented from gaining access.
2. Inventory and Control of Software Assets	Actively manage all software on the network so that only authorized software is installed and can execute, and that unauthorized and unmanaged software is found and prevented from installation or execution.
3. Continuous Vulnerability Management	Continuously acquire, assess, and take action on new information in order to identify vulnerabilities, remediate, and minimize the window of opportunity for attackers.
4. Controlled Use of Administrative Privileges	Maintain processes and tools to track, control, prevent, and correct the use, assignment, and configuration of administrative privileges on computers, networks, applications, and data.
5. Secure Configuration for security Hardware and Software workstations on Mobile Devices, Laptops, Workstations, and Servers	Implement and actively manage (track, report on, correct) the configuration of mobile devices, laptops, servers, and using a configuration management and change control process in order to prevent attackers from exploiting vulnerable services and settings.
6. Maintenance, Monitoring, and Analysis of Audit Logs	Collect, manage, and analyze audit and security logs of events that could help detect, understand, or recover from a possible attack.
7. Email and Web Browser Protections	Deploy automated controls to minimize the attack surface and the opportunities for attackers to manipulate human behavior through their interaction with web browsers and email systems or content.

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8. Malware Defenses	Control the installation, spread, and execution of malicious code at multiple points in the enterprise, while optimizing the use of automation to enable rapid updating of defense, data gathering, and corrective action.
9. Limitation and Control of Network Ports, Protocols, and Services	Manage (track, control, correct) the ongoing operational use of ports, protocols, services, and applications on networked devices in order to minimize windows of vulnerability and exposure available to attackers.
10. Data Recovery Capabilities	Maintain processes and tools to properly backup personal data with a proven methodology to ensure the confidentiality, integrity, availability, and recoverability of that data.
11. Secure Configuration for security Network Devices such as Firewalls, Routers, to Switches	Implement, and actively manage (track, report on, correct) the configuration of network infrastructure devices using a configuration management and change control process in order and prevent attackers from exploiting vulnerable services and settings.
12. Boundary Defenses	Detect, prevent, and correct the flow of information transferring networks of different trust levels with a focus on personal data.
13. Data Protection	Maintain processes and tools used to prevent data exfiltration, mitigate the effects of exfiltrated data, and ensure the confidentiality and integrity of personal data.
14. Controlled Access Based on the Need to Know	Maintain processes and tools to track, control, prevent, and correct secure access to critical or controlled assets (e.g. information, resources, systems) according to the formal determination of which
15. Wireless Access Control	Maintain processes and tools to track, control, prevent, and correct the secure use of wireless local area networks (WLANs), access points, and wireless client systems.
16. Account Monitoring and Control	Actively manage the life cycle of system and application accounts, their creation, use, dormancy, and deletion in order to minimize opportunities for unauthorized, inappropriate, or nefarious

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Organizational Measures to Ensure Security of Processing

1. Implement a Comprehensive Information Security Program	Through the implementation of a Comprehensive Information Program (CISP), maintain various administrative safeguards to personal data. These measures are designed to ensure: -security, confidentiality and integrity of personal data -protection against unauthorized access to or use of (stored) personal data in a manner that creates a substantial risk of identity theft or fraud -that employees, contractors, consultants, temporaries, and other workers who have access to personal data only process such data on instructions from the data controller.
2. Implement a Security Awareness and Training Program	For all functional roles (prioritizing those mission critical to the Business, its security, and the protection of personal data), identify the specific knowledge, skills and abilities needed to support the protection and defense of personal data; develop and execute an integrated plan to assess, identify gaps, and remediate through policy, organizational planning, training, and awareness programs.
3. Application Software Security	Manage the security life cycle of all in-house developed and acquired software in order to prevent, detect, and correct security weaknesses.
4. Incident Response and Management	Protect the organization's information, including personal data, as well as its reputation, by developing and implementing an incident response infrastructure (e.g., plans, defined roles, training, communications, management oversight, retainers, and insurance) for quickly discovering an attack and then effectively containing the damage, eradicating the attacker's presence, and restoring the integrity of the organization's network and systems.

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5. Security and Privacy Assessments, Penetration tests and exercises	Test the overall strength of the organization's defense (the technology, processes, and people) by simulating the objectives and actions of an attacker; as well as, assess and validate the controls, policies, procedures of the organization's privacy and personal data protections.
6. Physical Security and Entry Control	Require that all facilities meet the highest level of data protection standards possible, and reasonable, under the circumstances relevant to the facility and the data it contains, process, or transmits.

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