

Appropriate Solutions, Inc.

Surveillance 2 Audit Report

ISO 27001, 27701

Version Number: 1.0

Date: Jan 30th, 2023

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Executive Summary

Introduction and Scope

Securisea CB, LLC (“Securisea CB”) performed a Surveillance 2 Audit of Appropriate Solutions Inc. (“ASI”, “Client”) from January 12-13, 2023. This Surveillance 2 Audit is designed to evaluate the effectiveness of Client’s Information Security Management System (“ISMS”) and Privacy Information Management System (“PIMS”) and assess Client’s continued conformance with and certification under the following standards:

- ISO27001
- ISO27701

Based on the results of this Surveillance 2 Audit, Securisea CB’s determination is that the ISMS and PIMS are operating effectively.

Surveillance 1 Audit Summary

Item	Information
Identification of Certification Body	Securisea CB, LLC
Name and Address of Client	Appropriate Solutions, Inc. d/b/a Auric Systems International 85 Grove St Peterborough, NH 03458 United States of America
Client Representative	Raymond Côté, CTO
Type of audit	ISO/IEC 27001:2013 and ISO 27701:2019 Surveillance 2 Audit
Audit Criteria	ISO/IEC 27001:2013 ISO 27701:2019
Audit Objectives	Assess compliance of ISMS and PIMS with 27001 and 27701 on an ongoing basis

Item	Information
Audit Scope	Client's corporate infrastructure and procedures utilized to manage sales, client management and remote access to its cloud servers.
Deviations	None
Significant Issues	All significant issues are documented in this report
Date and Locations of Audit	The audit was conducted on January 12 th – 13 th 2023 The audit was conducted virtually via a Zoom video conference call
Version of Statement of Applicability	1.4
Audit Team	Audit team: Lead: Josh Daymont, General Manager Audit Observers: Genti Koxhaxhiku, ANAB Bill Rudiak, Securisea CB
Significant Changes Since Last Audit	No significant changes except for the divestiture of Client's Auric Token Vault subsidiary
Unresolved Issues	N/A
Is the Audit Combined, Joined or Integrated	N/A

Item	Information
Sampling Disclaimer	<p>This audit is based on sampling of populations and information and cannot provide an absolute guarantee of conformity</p>
Audit Recommendation	<p>No recommended changes to certification status</p>
Verification of <i>previous</i> nonconformities	<p>Resolutions for all 19 NCRs identified in the Surveilland 1 Audit were confirmed.</p>
Account of Risk Analysis	<p>No uncontrolled risks</p>
Statement on Conformity and Effectiveness of Management Systems	<p>The ISMS and PIMS are conformant and effective.</p>
Conclusion on Appropriateness of Certification Scope	<p>Securisea CB concludes that the current scope is appropriate</p>
Confirmation that the Audit Objectives have been fulfilled	<p>The objectives of the Surveillance 2 Audit have been fulfilled via the completion of the Surveillance 2 Agenda and delivery of this report</p>

Item	Information
Account of the Audit	<p>The audit occurred pleasantly over two days with several short breaks and a longer break for lunch each day. The audit primarily took the form of a series of video conference calls.</p> <p>Day 1 started with an opening meeting and then Client walked the audit team lead through an updated Security Policy and related documentation, a scope confirmation, its Risk Assessment, and justification for inclusion and exclusion of specific controls. Most of the Annex A/B controls were also reviewed.</p> <p>During Day 2 Client presented its ISMS and PIMS control implementations and evidence. Day 2 wrapped up with the closing meeting.</p>
Audit Methodologies (per ISO27006 9.4.3.2)	<p>The following audit methods were used in this audit:</p> <ul style="list-style-type: none"> Human interaction (interviews) Evidence-based auditing Policy and document reviews Process walk throughs
Significant Audit Trails Followed (per ISO27006 9.4.3.2)	<p>A number of significant audit trails were followed during this engagement including:</p> <ul style="list-style-type: none"> Client's risk assessment and statement of applicability Change management logs
Key observations made (per ISO27006 9.4.3.2)	<p>No key observations from this surveillance audit.</p>
Audit Deviations	<p>The audit deviated from the plan in that even numbered Annex A controls were audited first and then even number Annex B controls were audited after whereas the audit plan called for checking both Annex A and Annex B controls at the same time</p>
Documents Reviewed	<p>Please refer to the section titled 'Review of Management Systems Documentation' further on in this report.</p>
Client Risk Analysis	<p>There have been no changes in Client's Risk Analysis since the previous audit. Risk continues to be low.</p>
Client Scope	<p>The client scope remains the same as exists in the currently issued certificate</p>
Interview of Client in regards to correct use service marks publicly and also review of website/marketing materials to ensure that logo/marks of Securisea/ANAB and references to certification are accurate	<p>After the audit Client was advised to check for the correct use of all service marks on the website and after a check on January 20th the client was found to be using correct service marks</p>

Findings Measurement and Rating

The finding types are defined by both ISO17021 and ISO27006 which govern this engagement:

Finding Type	Total	Required Timeframes
Major Nonconformity	0	Corrective action plan needed by: April 10th 2023 Resolution needed by: April 30th 2023
Minor Nonconformity	0	Corrective action plan needed prior to April 30th 2023 Resolution needed prior to next Surveillance Audit
Opportunity for Improvement	2	Noted at end of report

Surveillance 2 Audit Key Findings

Major Nonconformities

None.

Minor Nonconformities

None

Opportunities for Improvement (OFI)

These items are possible areas to consider changing that—in the opinion of Securisea CB—could lead to an improved ISMS/PIMS:

OFI #1: Client should consider further clarifying the existing impact of PCI DSS on its regulatory compliance environment

OFI #2: Client should consider distinguishing more clearly where full end-to-end encrypted email is used versus traditional email.

Review of Management Systems Documentation

Securisea CB reviewed the following documents as part of this Surveillance 2 Audit:

Document	Notes
Auric Systems Security Policy	The Security Policy was broadly comprehensive with respect to implemented compliance systems and management systems
Risk Assessment Plan	The Risk Assessment Plan appropriately identified the process by which Client performs its Risk Assessments
ISO Risk Assessment	This document was complete and compliant
Statement of Applicability	This document was complete and compliant
Management Review	This document was complete and compliant.
Internal Audit	This document was complete and compliant.

Currently Missing Management System Documentation

The following documents must be prepared prior to the start of the Recertification Audit:

Document	Notes
None	N/A

Agreed Excluded Controls

The following ISO 27001 Annex A and ISO 27701 Annex A/B Controls have been excluded from the ISMS and PIMS:

Document	Notes
ISO27001	<ul style="list-style-type: none"> A.9.4.4 A.9.4.5 A.10.1.1 A.10.1.2 A.12.1.1 A.12.1.2 A.12.1.3 A.12.1.4 A.13.2.2 A.14.1.1 A.14.1.2 A.14.1.3 A.14.2.1 A.14.2.2 A.14.2.3 A.14.2.4 A.14.2.5 A.14.2.6 A.14.2.7 A.14.2.8 A.14.2.9 A.14.3.1
ISO27701	<ul style="list-style-type: none"> A.7.3.7 A.7.3.10 A.7.5.1 A.7.5.2 A7.5.3 A.7.5.4 B.8.5.1 B.8.5.2 B.8.5.3 B.8.5.4 B.8.5.6 B.8.5.7 B.8.5.8

Version Control

Securisea CB Audit Report	
Client Name	Appropriate Solutions, Inc. d/b/a Auric Systems International
Client Contact	Raymond Côté, CTO
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Authors	Josh Daymont
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QA Reviewer	Bill Rudiak
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