Southern Mutual Bank

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Data Classification & Handling Standard

Standard · synthetic assessor-grade test document

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1. Purpose and control objectives

This standard establishes the requirements, accountabilities and control objectives for data classification & handling standard across Southern Mutual Bank (“the Bank”). It forms part of the Bank's Information Security Management System and supports its obligations under ASD ISM, Essential Eight, ISO/IEC 27001:2022, SOC 2 (TSC), APRA CPS 234. It applies to Core banking platform and supporting services.

Control objectives:

• Maintain an accurate, owned and classified inventory of information assets.

• Ensure information is handled and disposed of according to its classification.

2. Scope

This document applies to all employees, contractors, temporary staff and third parties acting for Southern Mutual Bank, and to all information assets, systems and environments it operates or operates on its behalf — on-premise, cloud (AWS/Azure), SaaS and outsourced services.

In scope	Out of scope / exclusions
Production, management and DR environments; Core banking platform; identity, endpoint, network and data services.	Personal devices outside the BYOD programme; non-production sandboxes without Bank data (covered by separate standard).

3. Regulatory and standards context

The requirements herein are designed to satisfy, and are crosswalked to, the following frameworks applicable to a regulated Australian banking entity: ASD ISM, Essential Eight, ISO/IEC 27001:2022, SOC 2 (TSC), APRA CPS 234. Where an obligation is more stringent in one framework, the most stringent requirement applies.

4. Requirements

4.1 Inventory and ownership

4.1.1 An accurate inventory of hardware, software and information assets shall be maintained and reconciled regularly.

Control objective / rationale. This provides assurance that the control operates effectively over time.

Implementation. Responsibility, frequency and the system(s) of record are defined; results are reported to the control owner and second-line risk, and tracked to closure where below target. The control is configured per the hardening standard with drift monitoring and alerting.

Evidence expected. approved tickets + sign-off records; SIEM / log extract.

Test method. log + exception review. *Frequency.* Annual. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.1.2 Each asset shall have an accountable owner and a classification.

Control objective / rationale. This enforces least privilege, accountability and limits the blast radius of compromise.

Implementation. The control owner maintains a documented procedure and the supporting tooling configuration, reviewed on the stated cadence; deviations are routed through the exceptions process with compensating controls. The control is enforced at the identity provider and gateway with conditional access.

Evidence expected. sampled records + interview notes; scan or test report.

Test method. re-performance / observation. *Frequency.* Semi-annual. *Control owner.* Head of Compliance. *Status.* Partially implemented (self-declared by the document author; not independently verified).

4.1.3 Unauthorised, unmanaged and end-of-life assets shall be identified and remediated.

Control objective / rationale. This reduces the likelihood and impact of unauthorised access or control failure.

Implementation. Implementation is automated and enforced through platform policy where feasible, with documented manual compensating steps where automation is not yet available. The control is monitored in the SIEM with detections mapped to the relevant threats.

Evidence expected. SIEM / log extract; configuration export + change record.

Test method. configuration review + sampling. *Frequency.* Monthly. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.2 Classification and handling

4.2.1 Information shall be classified (e.g. Public, Internal, Confidential, Restricted) and labelled where practical.

Control objective / rationale. This enforces least privilege, accountability and limits the blast radius of compromise.

Implementation. The control owner maintains a documented procedure and the supporting tooling configuration, reviewed on the stated cadence; deviations are routed through the exceptions process with compensating controls. The control is enforced at the identity provider and gateway with conditional access.

Evidence expected. sampled records + interview notes; scan or test report.

Test method. log + exception review. *Frequency.* Monthly. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.2.2 Handling, storage, transmission and sharing controls shall be applied per classification.

Control objective / rationale. This reduces the likelihood and impact of unauthorised access or control failure.

Implementation. Implementation is automated and enforced through platform policy where feasible, with documented manual compensating steps where automation is not yet available. The control is monitored in the SIEM with detections mapped to the relevant threats.

Evidence expected. SIEM / log extract; configuration export + change record.

Test method. log + exception review. *Frequency.* Quarterly. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.2.3 Cloud and SaaS assets shall be discovered and brought under management.

Control objective / rationale. This supports timely detection, response and recovery and meets regulatory obligations.

Implementation. Responsibility, frequency and the system(s) of record are defined; results are reported to the control owner and second-line risk, and tracked to closure where below target. The control is aligned to the CIS-equivalent secure baseline and enforced via platform policy.

Evidence expected. scan or test report; tooling dashboard / telemetry extract.

Test method. automated telemetry review. *Frequency.* Annual. *Control owner.* Head of Compliance. *Status.* Partially implemented (self-declared by the document author; not independently verified).

4.3 Disposal and media

4.3.1 Media shall be sanitised or destroyed to an approved standard before disposal or reuse.

Control objective / rationale. This reduces the likelihood and impact of unauthorised access or control failure.

Implementation. Implementation is automated and enforced through platform policy where feasible, with documented manual compensating steps where automation is not yet available. The control is monitored in the SIEM with detections mapped to the relevant threats.

Evidence expected. SIEM / log extract; configuration export + change record.

Test method. re-performance / observation. *Frequency.* Annual. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.3.2 Disposal shall be evidenced (certificates of destruction) for confidential and restricted media.

Control objective / rationale. This supports timely detection, response and recovery and meets regulatory obligations.

Implementation. Responsibility, frequency and the system(s) of record are defined; results are reported to the control owner and second-line risk, and tracked to closure where below target. The control is aligned to the CIS-equivalent secure baseline and enforced via platform policy.

Evidence expected. scan or test report; tooling dashboard / telemetry extract.

Test method. re-performance / observation. *Frequency.* Monthly. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.3.3 Decommissioning shall remove access, data and licences and update the inventory.

Control objective / rationale. This provides assurance that the control operates effectively over time.

Implementation. The control owner maintains a documented procedure and the supporting tooling configuration, reviewed on the stated cadence; deviations are routed through the exceptions process with compensating controls. The control is implemented through the IGA/PAM platform with automated workflow and logging.

Evidence expected. configuration export + change record; approved tickets + sign-off records.

Test method. log + exception review. *Frequency.* Semi-annual. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.4 Software and SaaS discovery

4.4.1 Authorised software shall be defined; unauthorised software shall be detected and removed.

Control objective / rationale. This supports timely detection, response and recovery and meets regulatory obligations.

Implementation. Responsibility, frequency and the system(s) of record are defined; results are reported to the control owner and second-line risk, and tracked to closure where below target. The control is aligned to the CIS-equivalent secure baseline and enforced via platform policy.

Evidence expected. scan or test report; tooling dashboard / telemetry extract.

Test method. configuration review + sampling. *Frequency.* Monthly. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.4.2 SaaS and cloud assets shall be discovered continuously and reconciled against the inventory.

Control objective / rationale. This provides assurance that the control operates effectively over time.

Implementation. The control owner maintains a documented procedure and the supporting tooling configuration, reviewed on the stated cadence; deviations are routed through the exceptions process with compensating controls. The control is implemented through the IGA/PAM platform with automated workflow and logging.

Evidence expected. configuration export + change record; approved tickets + sign-off records.

Test method. configuration review + sampling. *Frequency.* Quarterly. *Control owner.* Head of Compliance. *Status.* Partially implemented (self-declared by the document author; not independently verified).

4.4.3 Software licences and support status shall be tracked; end-of-life software shall be remediated.

Control objective / rationale. This enforces least privilege, accountability and limits the blast radius of compromise.

Implementation. Implementation is automated and enforced through platform policy where feasible, with documented manual compensating steps where automation is not yet available. The control is configured per the hardening standard with drift monitoring and alerting.

Evidence expected. tooling dashboard / telemetry extract; sampled records + interview notes.

Test method. re-performance / observation. *Frequency.* Quarterly. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.4.4 Configuration items shall be linked to owners, services and classifications in the CMDB.

Control objective / rationale. This reduces the likelihood and impact of unauthorised access or control failure.

Implementation. Responsibility, frequency and the system(s) of record are defined; results are reported to the control owner and second-line risk, and tracked to closure where below target. The control is enforced at the identity provider and gateway with conditional access.

Evidence expected. approved tickets + sign-off records; SIEM / log extract.

Test method. configuration review + sampling. *Frequency.* Semi-annual. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.5 Secure disposal and decommissioning

4.5.1 Decommissioning shall remove access, data, certificates and licences and update the inventory.

Control objective / rationale. This provides assurance that the control operates effectively over time.

Implementation. The control owner maintains a documented procedure and the supporting tooling configuration, reviewed on the stated cadence; deviations are routed through the exceptions process with compensating controls. The control is implemented through the IGA/PAM platform with automated workflow and logging.

Evidence expected. configuration export + change record; approved tickets + sign-off records.

Test method. automated telemetry review. *Frequency.* Semi-annual. *Control owner.* Head of Compliance. *Status.* Partially implemented (self-declared by the document author; not independently verified).

4.5.2 Media shall be sanitised or destroyed to an approved standard before disposal or reuse.

Control objective / rationale. This enforces least privilege, accountability and limits the blast radius of compromise.

Implementation. Implementation is automated and enforced through platform policy where feasible, with documented manual compensating steps where automation is not yet available. The control is configured per the hardening standard with drift monitoring and alerting.

Evidence expected. tooling dashboard / telemetry extract; sampled records + interview notes.

Test method. re-performance / observation. *Frequency.* Monthly. *Control owner.* Head of Compliance. *Status.* Partially implemented (self-declared by the document author; not independently verified).

4.5.3 Destruction of confidential/restricted media shall be evidenced (certificates of destruction).

Control objective / rationale. This reduces the likelihood and impact of unauthorised access or control failure.

Implementation. Responsibility, frequency and the system(s) of record are defined; results are reported to the control owner and second-line risk, and tracked to closure where below target. The control is enforced at the identity provider and gateway with conditional access.

Evidence expected. approved tickets + sign-off records; SIEM / log extract.

Test method. log + exception review. *Frequency.* Quarterly. *Control owner.* Head of Compliance. *Status.* Partially implemented (self-declared by the document author; not independently verified).

4.5.4 Cloud resources shall be deprovisioned with data securely deleted per the retention schedule.

Control objective / rationale. This supports timely detection, response and recovery and meets regulatory obligations.

Implementation. The control owner maintains a documented procedure and the supporting tooling configuration, reviewed on the stated cadence; deviations are routed through the exceptions process with compensating controls. The control is monitored in the SIEM with detections mapped to the relevant threats.

Evidence expected. sampled records + interview notes; scan or test report.

Test method. log + exception review. *Frequency.* Annual. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.6 Governance, accountability and policy lifecycle

4.6.1 A named executive owner shall be accountable for this control area and shall report its status to the Board Risk Committee at least quarterly.

Control objective / rationale. This enforces least privilege, accountability and limits the blast radius of compromise.

Implementation. Implementation is automated and enforced through platform policy where feasible, with documented manual compensating steps where automation is not yet available. The control is configured per the hardening standard with drift monitoring and alerting.

Evidence expected. tooling dashboard / telemetry extract; sampled records + interview notes.

Test method. automated telemetry review. *Frequency.* Annual. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.6.2 This document shall be reviewed at least annually and after any material change to the business, technology, regulatory or threat environment, with version control maintained.

Control objective / rationale. This reduces the likelihood and impact of unauthorised access or control failure.

Implementation. Responsibility, frequency and the system(s) of record are defined; results are reported to the control owner and second-line risk, and tracked to closure where below target. The control is enforced at the identity provider and gateway with conditional access.

Evidence expected. approved tickets + sign-off records; SIEM / log extract.

Test method. re-performance / observation. *Frequency.* Semi-annual. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.6.3 Roles and responsibilities shall align to the three-lines-of-defence model, with first-line ownership, second-line oversight and third-line independent assurance.

Control objective / rationale. This supports timely detection, response and recovery and meets regulatory obligations.

Implementation. The control owner maintains a documented procedure and the supporting tooling configuration, reviewed on the stated cadence; deviations are routed through the exceptions process with compensating controls. The control is monitored in the SIEM with detections mapped to the relevant threats.

Evidence expected. sampled records + interview notes; scan or test report.

Test method. log + exception review. *Frequency.* Quarterly. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.6.4 Material decisions, approvals and deviations shall be minuted and retained as part of the governance record.

Control objective / rationale. This provides assurance that the control operates effectively over time.

Implementation. Implementation is automated and enforced through platform policy where feasible, with documented manual compensating steps where automation is not yet available. The control is aligned to the CIS-equivalent secure baseline and enforced via platform policy.

Evidence expected. SIEM / log extract; configuration export + change record.

Test method. configuration review + sampling. *Frequency.* Monthly. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.7 Risk assessment and treatment

4.7.1 Risks within this control area shall be identified, assessed (likelihood × impact), treated and recorded in the enterprise risk register with an accountable owner.

Control objective / rationale. This reduces the likelihood and impact of unauthorised access or control failure.

Implementation. Responsibility, frequency and the system(s) of record are defined; results are reported to the control owner and second-line risk, and tracked to closure where below target. The control is enforced at the identity provider and gateway with conditional access.

Evidence expected. approved tickets + sign-off records; SIEM / log extract.

Test method. log + exception review. *Frequency.* Annual. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.7.2 Residual risk exceeding the approved risk appetite shall be escalated with a treatment plan and target date.

Control objective / rationale. This supports timely detection, response and recovery and meets regulatory obligations.

Implementation. The control owner maintains a documented procedure and the supporting tooling configuration, reviewed on the stated cadence; deviations are routed through the exceptions process with compensating controls. The control is monitored in the SIEM with detections mapped to the relevant threats.

Evidence expected. sampled records + interview notes; scan or test report.

Test method. automated telemetry review. *Frequency.* Semi-annual. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.7.3 Risk assessments shall be refreshed on a defined cadence and upon significant change.

Control objective / rationale. This provides assurance that the control operates effectively over time.

Implementation. Implementation is automated and enforced through platform policy where feasible, with documented manual compensating steps where automation is not yet available. The control is aligned to the CIS-equivalent secure baseline and enforced via platform policy.

Evidence expected. SIEM / log extract; configuration export + change record.

Test method. log + exception review. *Frequency.* Quarterly. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.7.4 Key risk indicators (KRIs) shall be defined and monitored against thresholds, with breaches escalated.

Control objective / rationale. This enforces least privilege, accountability and limits the blast radius of compromise.

Implementation. Responsibility, frequency and the system(s) of record are defined; results are reported to the control owner and second-line risk, and tracked to closure where below target. The control is implemented through the IGA/PAM platform with automated workflow and logging.

Evidence expected. scan or test report; tooling dashboard / telemetry extract.

Test method. re-performance / observation. *Frequency.* Quarterly. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.8 Monitoring, measurement and reporting

4.8.1 Control performance shall be monitored continuously through automated telemetry into the central assurance platform.

Control objective / rationale. This supports timely detection, response and recovery and meets regulatory obligations.

Implementation. The control owner maintains a documented procedure and the supporting tooling configuration, reviewed on the stated cadence; deviations are routed through the exceptions process with compensating controls. The control is monitored in the SIEM with detections mapped to the relevant threats.

Evidence expected. sampled records + interview notes; scan or test report.

Test method. configuration review + sampling. *Frequency.* Quarterly. *Control owner.* Head of Compliance. *Status.* Partially implemented (self-declared by the document author; not independently verified).

4.8.2 The metrics and targets in this document shall be reported monthly to the control owner and quarterly to the Executive Risk Committee.

Control objective / rationale. This provides assurance that the control operates effectively over time.

Implementation. Implementation is automated and enforced through platform policy where feasible, with documented manual compensating steps where automation is not yet available. The control is aligned to the CIS-equivalent secure baseline and enforced via platform policy.

Evidence expected. SIEM / log extract; configuration export + change record.

Test method. log + exception review. *Frequency.* Monthly. *Control owner.* Head of Compliance. *Status.* Partially implemented (self-declared by the document author; not independently verified).

4.8.3 Control failures and exceptions shall be logged, triaged by severity and remediated within risk-based timeframes.

Control objective / rationale. This enforces least privilege, accountability and limits the blast radius of compromise.

Implementation. Responsibility, frequency and the system(s) of record are defined; results are reported to the control owner and second-line risk, and tracked to closure where below target. The control is implemented through the IGA/PAM platform with automated workflow and logging.

Evidence expected. scan or test report; tooling dashboard / telemetry extract.

Test method. log + exception review. *Frequency.* Monthly. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.8.4 Independent assurance (internal audit / external assessment) shall periodically test design and operating effectiveness; findings shall be tracked to closure.

Control objective / rationale. This reduces the likelihood and impact of unauthorised access or control failure.

Implementation. The control owner maintains a documented procedure and the supporting tooling configuration, reviewed on the stated cadence; deviations are routed through the exceptions process with compensating controls. The control is configured per the hardening standard with drift monitoring and alerting.

Evidence expected. configuration export + change record; approved tickets + sign-off records.

Test method. re-performance / observation. *Frequency.* Monthly. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.9 Records, retention and evidence

4.9.1 Evidence demonstrating the operation of these controls shall be generated, retained and protected per the records-retention schedule.

Control objective / rationale. This provides assurance that the control operates effectively over time.

Implementation. Implementation is automated and enforced through platform policy where feasible, with documented manual compensating steps where automation is not yet available. The control is aligned to the CIS-equivalent secure baseline and enforced via platform policy.

Evidence expected. SIEM / log extract; configuration export + change record.

Test method. automated telemetry review. *Frequency.* Quarterly. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.9.2 Evidence shall be sufficient for an independent assessor to conclude on operating effectiveness without reliance on undocumented knowledge.

Control objective / rationale. This enforces least privilege, accountability and limits the blast radius of compromise.

Implementation. Responsibility, frequency and the system(s) of record are defined; results are reported to the control owner and second-line risk, and tracked to closure where below target. The control is implemented through the IGA/PAM platform with automated workflow and logging.

Evidence expected. scan or test report; tooling dashboard / telemetry extract.

Test method. log + exception review. *Frequency.* Annual. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.9.3 Access to control evidence shall be least-privilege and itself logged; integrity shall be protected against tampering.

Control objective / rationale. This reduces the likelihood and impact of unauthorised access or control failure.

Implementation. The control owner maintains a documented procedure and the supporting tooling configuration, reviewed on the stated cadence; deviations are routed through the exceptions process with compensating controls. The control is configured per the hardening standard with drift monitoring and alerting.

Evidence expected. configuration export + change record; approved tickets + sign-off records.

Test method. re-performance / observation. *Frequency.* Semi-annual. *Control owner.* Head of Compliance. *Status.* Partially implemented (self-declared by the document author; not independently verified).

4.9.4 On decommissioning, records shall be retained or disposed of per the retention schedule and legal hold requirements.

Control objective / rationale. This supports timely detection, response and recovery and meets regulatory obligations.

Implementation. Implementation is automated and enforced through platform policy where feasible, with documented manual compensating steps where automation is not yet available. The control is enforced at the identity provider and gateway with conditional access.

Evidence expected. tooling dashboard / telemetry extract; sampled records + interview notes.

Test method. log + exception review. *Frequency.* Monthly. *Control owner.* Head of Compliance. *Status.* Partially implemented (self-declared by the document author; not independently verified).

4.10 Continuous improvement

4.10.1 Lessons from incidents, audits, assessments and exercises shall be fed back into this control area and the document updated accordingly.

Control objective / rationale. This enforces least privilege, accountability and limits the blast radius of compromise.

Implementation. Responsibility, frequency and the system(s) of record are defined; results are reported to the control owner and second-line risk, and tracked to closure where below target. The control is implemented through the IGA/PAM platform with automated workflow and logging.

Evidence expected. scan or test report; tooling dashboard / telemetry extract.

Test method. re-performance / observation. *Frequency.* Annual. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.10.2 Control maturity shall be assessed against a defined target state, with a roadmap to close gaps.

Control objective / rationale. This reduces the likelihood and impact of unauthorised access or control failure.

Implementation. The control owner maintains a documented procedure and the supporting tooling configuration, reviewed on the stated cadence; deviations are routed through the exceptions process with compensating controls. The control is configured per the hardening standard with drift monitoring and alerting.

Evidence expected. configuration export + change record; approved tickets + sign-off records.

Test method. re-performance / observation. *Frequency.* Annual. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

4.10.3 Automation and tooling shall be progressively adopted to reduce manual effort and error.

Control objective / rationale. This supports timely detection, response and recovery and meets regulatory obligations.

Implementation. Implementation is automated and enforced through platform policy where feasible, with documented manual compensating steps where automation is not yet available. The control is enforced at the identity provider and gateway with conditional access.

Evidence expected. tooling dashboard / telemetry extract; sampled records + interview notes.

Test method. configuration review + sampling. *Frequency.* Monthly. *Control owner.* Head of Compliance. *Status.* Implemented (self-declared by the document author; not independently verified).

5. Roles and responsibilities (RACI)

Role	R	A	C	I	Responsibility
Head of Compliance	✓	✓			Owns this document; ensures it is current, resourced and effective.
System / Asset owners	✓		✓		Implement and operate the controls in their scope.
Security Operations	✓		✓	✓	Monitors compliance; investigates and responds to exceptions.
Risk & Compliance (2nd line)			✓	✓	Provides oversight, challenge and reporting.
Internal Audit (3rd line)				✓	Independent assurance over design and operating effectiveness.
All staff & contractors	✓			✓	Comply with the requirements; report suspected breaches.

6. Procedures and implementation

6.1 Reconcile asset inventory against discovery tooling; remediate unmanaged assets.

6.2 Apply classification at creation; enforce handling via DLP and access controls.

6.3 Sanitise/destroy media on disposal and retain evidence.

7. Monitoring, metrics and KPIs

Metric	Target	Frequency
Assets with owner + classification	≥ 98%	Quarterly
Unmanaged assets discovered	Trending down	Monthly

Metric	Target	Frequency
Media disposed with evidence	100%	Quarterly
End-of-life assets remediated	100%	Quarterly

8. Compliance, monitoring and enforcement

Compliance is monitored continuously through automated control telemetry, the metrics above and periodic independent assurance. Material non-compliance is recorded in the risk register, escalated to the Executive Risk Committee, and tracked to closure. Wilful or negligent breaches may result in disciplinary action up to termination.

9. Exceptions and waivers

Any deviation requires a documented risk assessment, compensating controls, an expiry date and approval by the accountable risk owner (and the CISO for high-risk deviations). Active exceptions are recorded and reviewed in the Exceptions & Waivers Register.

10. Definitions

Term	Definition
Information asset	Data or a system of value requiring protection.
Data classification	A label denoting sensitivity and the handling controls required.
Sanitisation	Rendering data unrecoverable from media before disposal or reuse.

11. Related documents

• Asset Management Policy

• Data Classification & Handling Standard

• Data Retention & Disposal Standard

12. Control framework mapping

Framework	Indicative mapped controls
ASD ISM	Guidelines: Access, System hardening, Monitoring
Essential Eight	ML2 target
ISO/IEC 27001:2022	A.5.15, A.5.18, A.8.2, A.8.16, A.5.23
SOC 2 (TSC)	CC6.1, CC6.2, CC6.3, CC7.2
APRA CPS 234	Information security capability, Control testing, Incident notification

Threat and risk context

This control area addresses the threats and failure modes most relevant to Core banking platform in a regulated Australian banking context — including credential compromise, insider misuse, unmanaged change, third-party failure, data loss and control drift. The requirements in section 4 are calibrated to reduce both the likelihood and the impact of these scenarios, and are tested on the cadence set out in section 7.

• Risk addressed: Maintain an accurate, owned and classified inventory of information assets.

• Risk addressed: Ensure information is handled and disposed of according to its classification.

Operating model and continuous assurance

Day-to-day operation follows the three-lines-of-defence model: first-line owners operate the controls and remediate exceptions; second-line risk and compliance provide oversight, challenge and reporting; third-line internal audit provides independent assurance. Control performance is monitored continuously through automated telemetry into

the central assurance platform, with monthly control reporting to the control owner and quarterly reporting to the Executive Risk Committee. Deficiencies are recorded in the enterprise risk register and tracked to closure against the targets in section 7.

Training, awareness and competency

Personnel with responsibilities under this document receive role-based training at onboarding and at least annually. General security awareness, including phishing simulation, is delivered to all staff and contractors; completion is tracked and non-completion is escalated to people leaders. Control owners maintain procedures and runbooks sufficient for a competent operator to execute the control consistently, and review them after any material change to the business, technology or threat environment.

Appendix C — Control register (per requirement)

Ref	Control statement	Framework	Test freq.	Status
4.1.1	An accurate inventory of hardware, software and information assets sha…	ASD ISM	Quarterly	Partially implemented
4.1.2	Each asset shall have an accountable owner and a classification.	Essential Eight	Monthly	Implemented
4.1.3	Unauthorised, unmanaged and end-of-life assets shall be identified and…	ISO/IEC 27001:2022	Semi-annual	Implemented
4.2.1	Information shall be classified (e.g. Public, Internal, Confidential, …	SOC 2 (TSC)	Quarterly	Implemented
4.2.2	Handling, storage, transmission and sharing controls shall be applied …	APRA CPS 234	Quarterly	Implemented
4.2.3	Cloud and SaaS assets shall be discovered and brought under management…	ASD ISM	Quarterly	Implemented
4.3.1	Media shall be sanitised or destroyed to an approved standard before d…	Essential Eight	Semi-annual	Implemented
4.3.2	Disposal shall be evidenced (certificates of destruction) for confiden…	ISO/IEC 27001:2022	Semi-annual	Implemented
4.3.3	Decommissioning shall remove access, data and licences and update the …	SOC 2 (TSC)	Annual	Implemented
4.4.1	Authorised software shall be defined; unauthorised software shall be d…	APRA CPS 234	Semi-annual	Implemented
4.4.2	SaaS and cloud assets shall be discovered continuously and reconciled …	ASD ISM	Annual	Partially implemented
4.4.3	Software licences and support status shall be tracked; end-of-life sof…	Essential Eight	Monthly	Implemented
4.4.4	Configuration items shall be linked to owners, services and classifica…	ISO/IEC 27001:2022	Quarterly	Implemented
4.5.1	Decommissioning shall remove access, data, certificates and licences a…	SOC 2 (TSC)	Semi-annual	Implemented
4.5.2	Media shall be sanitised or destroyed to an approved standard before d…	APRA CPS 234	Monthly	Implemented
4.5.3	Destruction of confidential/restricted media shall be evidenced (certi…	ASD ISM	Semi-annual	Implemented
4.5.4	Cloud resources shall be deprovisioned with data securely deleted per …	Essential Eight	Semi-annual	Partially implemented
4.6.1	A named executive owner shall be accountable for this control area and…	ISO/IEC 27001:2022	Quarterly	Implemented

Ref	Control statement	Framework	Test freq.	Status
4.6.2	This document shall be reviewed at least annually and after any materi…	SOC 2 (TSC)	Quarterly	Partially implemented
4.6.3	Roles and responsibilities shall align to the three-lines-of-defence m…	APRA CPS 234	Monthly	Implemented
4.6.4	Material decisions, approvals and deviations shall be minuted and reta…	ASD ISM	Monthly	Implemented
4.7.1	Risks within this control area shall be identified, assessed (likeliho…	Essential Eight	Semi-annual	Partially implemented
4.7.2	Residual risk exceeding the approved risk appetite shall be escalated …	ISO/IEC 27001:2022	Annual	Partially implemented
4.7.3	Risk assessments shall be refreshed on a defined cadence and upon sign…	SOC 2 (TSC)	Annual	Implemented
4.7.4	Key risk indicators (KRIs) shall be defined and monitored against thre…	APRA CPS 234	Monthly	Implemented
4.8.1	Control performance shall be monitored continuously through automated …	ASD ISM	Quarterly	Implemented
4.8.2	The metrics and targets in this document shall be reported monthly to …	Essential Eight	Monthly	Implemented
4.8.3	Control failures and exceptions shall be logged, triaged by severity a…	ISO/IEC 27001:2022	Annual	Implemented
4.8.4	Independent assurance (internal audit / external assessment) shall per…	SOC 2 (TSC)	Semi-annual	Partially implemented
4.9.1	Evidence demonstrating the operation of these controls shall be genera…	APRA CPS 234	Annual	Implemented
4.9.2	Evidence shall be sufficient for an independent assessor to conclude o…	ASD ISM	Monthly	Partially implemented
4.9.3	Access to control evidence shall be least-privilege and itself logged;…	Essential Eight	Semi-annual	Implemented
4.9.4	On decommissioning, records shall be retained or disposed of per the r…	ISO/IEC 27001:2022	Semi-annual	Implemented
4.10.1	Lessons from incidents, audits, assessments and exercises shall be fed…	SOC 2 (TSC)	Quarterly	Partially implemented
4.10.2	Control maturity shall be assessed against a defined target state, wit…	APRA CPS 234	Monthly	Implemented
4.10.3	Automation and tooling shall be progressively adopted to reduce manual…	ASD ISM	Monthly	Partially implemented

Appendix A — Control implementation checklist

Control area	Controls	Implementation status
Inventory and ownership	3 control(s)	Partially implemented
Classification and handling	3 control(s)	Implemented
Disposal and media	3 control(s)	Partially implemented
Software and SaaS discovery	4 control(s)	Implemented
Secure disposal and decommissioning	4 control(s)	Implemented

Control area	Controls	Implementation status
Governance, accountability and policy lifecycle	4 control(s)	Implemented
Risk assessment and treatment	4 control(s)	Implemented
Monitoring, measurement and reporting	4 control(s)	Planned
Records, retention and evidence	4 control(s)	Implemented
Continuous improvement	3 control(s)	Implemented

Appendix B — Control testing and evidence matrix

Control area	Ctrls	Test method	Evidence	Frequency
Inventory and ownership	3	Configuration review + sampling	Config export + screenshots	Quarterly
Classification and handling	3	Automated control telemetry	Dashboard / telemetry extract	Monthly
Disposal and media	3	Evidence inspection + interview	Approved records + tickets	Annual
Software and SaaS discovery	4	Re-performance / observation	Observed run + sign-off	Monthly
Secure disposal and decommissioning	4	Log and exception review	SIEM / log extract	Quarterly
Governance, accountability and policy lifecycle	4	Independent test / scan	Scan / test report	Monthly
Risk assessment and treatment	4	Configuration review + sampling	Config export + screenshots	Quarterly
Monitoring, measurement and reporting	4	Automated control telemetry	Dashboard / telemetry extract	Monthly
Records, retention and evidence	4	Evidence inspection + interview	Approved records + tickets	Monthly
Continuous improvement	3	Re-performance / observation	Observed run + sign-off	Monthly

Evidence is retained for audit per the records-retention schedule and crosswalked to ASD ISM, Essential Eight, ISO/IEC 27001:2022, SOC 2 (TSC), APRA CPS 234.

13. Document approval and distribution

Approval	Name	Role	Date
Prepared by	David Okafor	Head of Compliance	10 Oct 2026
Reviewed by	Laura Mendez	Third-Party Risk Manager	20 Oct 2026
Approved by	Priya Sharma	Chief Information Security Officer	26 Oct 2026
Endorsed by	—	Board Risk Committee	30 Oct 2026

Distribution: all staff and contractors via the policy portal; control owners; Risk & Compliance (2nd line); Internal Audit (3rd line); relevant material service providers under NDA.

14. Abbreviations

Abbreviation	Meaning
ISMS	Information Security Management System
MFA / SSO	Multi-Factor Authentication / Single Sign-On
PAM / IGA	Privileged Access Management / Identity Governance & Administration
RTO / RPO	Recovery Time Objective / Recovery Point Objective
SoD	Segregation of Duties
KRI / KPI	Key Risk Indicator / Key Performance Indicator

Abbreviation	Meaning
SIEM / SOC	Security Information & Event Management / Security Operations Centre

15. Revision history

Version	Date	Author	Summary of change
1.0	03 Oct 2023	Tom Bauer	Initial issue.
2.0	02 Oct 2024	Aisha Khan	Annual review; control uplift and framework alignment.
3.3	02 Oct 2025	David Okafor	Updated for current framework versions and cloud scope.