

		[Insert Registered Legal Entity Name Here]									
Document number: P12S		Document Title: Asset Management Policy									
Version: 1.0		Effective Date: 01.01.2025		Document Owner:							
X	Policy		Standard		Procedure		Form		Register		Other

Revision history				
Revision number	Revision Date	Changes	Reviewed by	Process owner

Approvals			
Name	Title	Date	Signature

Aligned with standards and regulations where applicable		
Standard/Regulation	Clause/Article	Comment
ISO/IEC 27001:2022	Clause 8.1	
ISO/IEC 27002:2022	Control 5.9	
NIST SP 800-53 Rev.5	CM-8	
EU NIS2	Article 21(2)(a)	
EU DORA	Article 5(8)	
COBIT 2019	BAI09	
EU GDPR	Article 30	

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1. Purpose

- 1.1. This policy defines how the organization identifies, tracks, protects, and retires its information assets, including both physical and digital components.
- 1.2. The aim is to reduce operational and security risks by maintaining visibility, accountability, and secure handling of all business assets throughout their lifecycle.
- 1.3. A reliable asset inventory supports regulatory compliance, incident response, continuity planning, and risk management.
- 1.4. This policy also supports certification under ISO/IEC 27001 and demonstrates alignment with legal, financial, and cybersecurity obligations under frameworks like GDPR, NIS2, and DORA.
- 1.5. For small and medium-sized enterprises (SMEs), a simple but systematic asset management approach is essential to avoid unmanaged devices, data loss, or audit failure—especially when operating with limited technical staffing.

2. Scope

- 2.1. This policy applies to all assets owned, leased, or otherwise managed by the organization, including those used in:
 - 2.1.1. Office-based work
 - 2.1.2. Remote or hybrid arrangements
 - 2.1.3. Field-based or mobile operations
 - 2.1.4. Cloud and outsourced environments
- 2.2. Covered asset types include but are not limited to:
 - 2.2.1. **Hardware:** laptops, desktops, monitors, phones, tablets, USB drives, routers, printers, backup media
 - 2.2.2. **Software:** installed applications, SaaS tools, operating systems, antivirus tools, licenses
 - 2.2.3. **Data assets:** business data repositories, spreadsheets, customer records, source code
 - 2.2.4. **Digital credentials and services:** domain names, digital certificates, API keys, email accounts, cloud logins
 - 2.2.5. **Access devices:** keys, smartcards, access fobs, biometric tokens
- 2.3. All employees, contractors, and third-party providers handling organizational assets fall within the scope of this policy.
- 2.4. The policy also governs both short-term (e.g., project-specific laptops) and long-term assets, as well as shared assets used by multiple personnel.

3. Objectives

- 3.1. Establish and maintain a complete, accurate inventory of all relevant assets, updated on a continuous basis.
- 3.2. Ensure that each asset has a designated owner responsible for its use, storage, and return.
- 3.3. Classify assets based on sensitivity, business impact, or regulatory relevance, enabling differentiated protection levels.
- 3.4. Define clear procedures for asset issuance, reassignment, maintenance, loss reporting, and retirement.

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- 3.5. Ensure assets are securely handled throughout their lifecycle and that information they store is either protected or securely erased upon disposal.
- 3.6. Reduce the likelihood of security incidents caused by untracked, unreturned, or misused organizational resources.
- 3.7. Support compliance with relevant laws (e.g., GDPR's accountability principle) and cybersecurity certification standards.

4. Roles and Responsibilities

4.1. General Manager (GM)

- 4.1.1. Owns this policy and is responsible for ensuring that asset management practices are implemented and followed across the organization.
- 4.1.2. Reviews and approves updates to the asset inventory and authorizes asset decommissioning or transfer where needed.
- 4.1.3. Must be notified of any significant loss, theft, or misuse of assets.

4.2. IT Lead or Designated Asset Custodian

- 4.2.1. Maintains the asset inventory (e.g., in a spreadsheet, ticketing system, or lightweight asset tracker).
- 4.2.2. Assigns asset ownership and tracks changes to status (e.g., new, in use, under repair, retired).
- 4.2.3. Verifies that all issued assets are documented and linked to an individual or business unit.
- 4.2.4. Ensures that classification labels are applied and followed (e.g., Internal, Confidential).
- 4.2.5. Coordinates retrieval, sanitization, and deactivation of assets during offboarding or retirement.
- 4.2.6. Reports any unresolved asset discrepancies to the GM.

4.3. Line Managers

- 4.3.1. Notify the IT Lead when staff join, leave, or change roles, triggering asset assignment or return.
- 4.3.2. Support the IT Lead in confirming that all issued assets are returned and cleared of sensitive data.
- 4.3.3. May act as owners for shared departmental assets and ensure proper usage tracking.

4.4. Employees and Contractors

- 4.4.1. Must take appropriate care of any organizational assets they receive or use.
- 4.4.2. Are responsible for reporting new assets, suspected damage, or misplacement immediately to the IT Lead.
- 4.4.3. Must not lend, share, or reassign assets without documented approval.
- 4.4.4. Must ensure safe storage and transport, especially for portable devices (e.g., laptops, phones, USBs).
- 4.4.5. Are obligated to return all assets and associated materials upon request, role change, or contract termination.

5. Governance Requirements

- 5.1. The IT Lead must maintain a structured asset inventory that includes the following minimum fields:
 - 5.1.1. Asset ID or serial number
 - 5.1.2. Asset type (e.g., laptop, phone, license)
 - 5.1.3. Assigned owner (name and role)

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- 5.1.4. Physical or logical location (if relevant)
- 5.1.5. Classification level (Internal, Confidential)
- 5.1.6. Status (active, pending return, retired)
- 5.1.7. Purchase or issuance date
- 5.1.8. Return or disposal date (if applicable)
- 5.2. All updates to the asset inventory (new entries, reassignments, removals) must be logged promptly. Spot-checks must be performed at least semi-annually to verify accuracy.
- 5.3. Assets must be classified according to their sensitivity or criticality. For example:
 - 5.3.1. *Internal*: General business devices or software
 - 5.3.2. *Confidential*: Devices storing customer data, HR records, financial information, or intellectual property
- 5.4. The asset inventory must be protected against unauthorized access or alteration. Access should be limited to the GM, IT Lead, and designated personnel. Backups of the inventory must be maintained.
- 6. **Policy Implementation Requirements**
 - 6.1. **Asset Issuance and Documentation**
 - 6.1.1. All newly purchased or reassigned assets must be recorded in the asset inventory immediately.
 - 6.1.2. [.....]

ISO/IEC 27001:2022

Clause 8.1: Requires operational controls to manage assets and protect them throughout their use.

ISO/IEC 27002:2022

Control 5.9: Details how to identify, assign ownership, classify, and manage assets securely.

NIST SP 800-53 Rev.5

CM-8: Requires organizations to develop and maintain an inventory of system components, including hardware, software, and virtual assets.

EU GDPR

Article 30: Requires documentation of data processing activities, which depends on knowing where data is stored and on what assets.

EU NIS2

Article 21(2)(a): Calls for technical and organizational measures, including asset tracking, to protect network and information systems.

EU DORA

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Article 5(8): Financial entities must maintain detailed inventories of ICT assets as part of ICT risk management.

COBIT 2019

BAI09: Specifies that IT assets must be managed throughout their lifecycle—from acquisition to retirement—with clear ownership and controls.

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