Do P22	cument numb 2S	er:	Document Title		d Monitoring Pol	icy
Vei	rsion: 1.0	Effective Date: 01.01.2025	Document Owr	ner:		
Х	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	Controls 8.15-8.17							
NIST SP 800-53 Rev.5	AU-2 to AU-12, SI-4							
EU GDPR	Articles 5(1)(f), 32, 33							
EU NIS2	Articles 21(2)(d), 23							
EU DORA	Articles 10, 15							
COBIT 2019	DSS01.03, DSS05.02							

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1. Purpose

- 1.1. This policy establishes mandatory logging and monitoring controls to ensure the security, accountability, and operational integrity of the organization's IT systems.
- 1.2. It defines the types of events that must be logged, how logs are stored, how they are reviewed, and the responsibilities of staff and service providers.
- 1.3. Logging and monitoring support threat detection, regulatory compliance, incident response, and forensic analysis.
- 1.4. This policy enables the organization to meet the operational control requirements of ISO/IEC 27001:2022 and supports ongoing audit-readiness, customer trust, and compliance with GDPR, NIS2, and DORA.

2. Scope

- 2.1. This policy applies to all systems and users within the organization, including:
 - 2.1.1. Workstations, laptops, servers, firewalls, switches, routers, and wireless access points
 - 2.1.2. Cloud services used for business operations (e.g., email, file storage, backups, collaboration tools)
 - 2.1.3. Logging functions on antivirus software, applications, operating systems, and network equipment
 - 2.1.4. All employees, contractors, and managed service providers (MSPs) who use or administer systems
 - 2.1.5. Any location where company IT systems are used, including remote, hybrid, or BYOD environments
- 2.2. The policy also applies to logs generated by third-party services where the organization has administrative access or contractual audit rights.

3. Objectives

- 3.1. Ensure logging of system activity, including authentication, configuration changes, access to sensitive data, and security alerts
- 3.2. Maintain secure and accurate logs to detect policy violations, system errors, or unauthorized actions
- 3.3. Enable rapid review of logs during incidents, investigations, and audits
- 3.4. Support time synchronization to ensure integrity and correlation of log data
- 3.5. Protect logs from tampering, loss, or premature deletion
- 3.6. Fulfill legal and regulatory obligations for system accountability, traceability, and breach response

4. Roles and Responsibilities

4.1. General Manager (GM)

- 4.1.1. Approves this policy and ensures implementation across all business systems
- 4.1.2. Reviews high-severity alerts and serious audit findings reported by IT or privacy functions
- 4.1.3. Signs off on exceptions where logging or retention cannot be technically enforced

4.2. IT Support Provider / Internal IT Role

- 4.2.1. Implements and configures logging for operating systems, network devices, antivirus tools, and key applications
- 4.2.2. Ensures logs are retained, backed up, and protected from alteration
- 4.2.3. Reviews logs on a scheduled basis and investigates suspicious or unauthorized activity
- 4.2.4. Maintains alerting systems that flag anomalous behavior or intrusion indicators

4.3. Privacy Coordinator / Data Protection Lead

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- 4.3.1. Verifies that log data relating to personal or sensitive information is handled in line with GDPR and other data protection laws
- 4.3.2. Supports investigations involving access to personal data or security events affecting user confidentiality
- 4.3.3. Ensures logs are used in incident response, breach notification analysis, and internal reviews

4.4. All Staff and Contractors

- 4.4.1. Must not disable or interfere with system logging or alert mechanisms
- 4.4.2. Must promptly report system error messages, failed login attempts, or other anomalies

[.....]

11. Reference Standards and Frameworks

ISO/IEC 27001:2022

Clause 8.1 – Requires implementation of operational controls to mitigate information security risks, including logging.

ISO/IEC 27002:2022

Control 8.15 – Requires event logging to support anomaly detection and accountability.

Control 8.16 – Requires protection of logs from tampering and unauthorized access.

Control 8.17 - Requires monitoring systems for unusual activity and confirming the effectiveness of

NIST SP 800-53 Rev.5

AU-2 to AU-12 – Cover audit log content, review, retention, and automated alerting.

SI-4 – Requires detection of system anomalies and reporting of suspicious events.

EU GDPR

Article 5(1)(f) – Requires integrity and confidentiality of personal data, which includes logging of access.

Article 32 – Mandates technical and organizational measures to ensure security, including logging and monitoring.

Article 33 – Requires timely breach notification, supported by logs that enable root cause analysis.

EU NIS2 Directive

Article 21(2)(d) – Requires logging mechanisms that detect anomalies and provide support during incident investigations.

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Article 23 – Mandates reporting of incidents within 24 hours, which depends on accurate and timely log data.

EU DORA

Article 10 – Requires digital operational resilience, including traceability of ICT-related incidents through logging.

Article 15 – Obligates monitoring of service providers, including log access and review rights.

COBIT 2019

DSS01.03 – Requires traceability of system activity through logging and monitoring.

DSS05.02 – Addresses logging as a key control in protecting against malware and other unauthorized activity.

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