

		[Insert Registered Legal Entity Name Here]									
Document number: P23		Document Title: Time Synchronization 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 8.17	
NIST SP 800-53 Rev.5	SC-45, AU-8	
EU GDPR	Article 32	
EU NIS2	Article 21(2)(e)	
EU DORA	Articles 9, 10	
COBIT 2019	DSS05.04, MEA03	

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1. Purpose

- 1.1 The purpose of this policy is to ensure that all organizational systems, applications, devices, and cloud services maintain consistent and accurate time settings by synchronizing with designated, trusted time sources.
- 1.2 Accurate time synchronization is essential for reliable logging, secure communications, audit traceability, incident response, and forensic investigation. Misaligned time can result in uncorrelated logs, failed authentication, and incomplete regulatory reporting.
- 1.3 This policy supports ISO/IEC 27001 Annex A Control 8.17 and related international standards by enforcing time accuracy and clock drift detection across the organization's IT estate.

2. Scope

- 2.1 This policy applies to:
 - 2.1.1 All infrastructure components including servers, workstations, network devices, firewalls, and IoT systems
 - 2.1.2 Virtual and cloud environments (e.g., AWS, Azure, Google Cloud)
 - 2.1.3 All systems participating in logging, authentication, transaction processing, or security event correlation
 - 2.1.4 Internal employees, contractors, and third-party service providers with responsibility over time-sensitive systems
- 2.2 Systems generating or consuming timestamped records—such as log entries, alerts, user activity records, or forensic evidence—are considered in-scope.

3. Objectives

- 3.1 Define a consistent, centralized time synchronization architecture using approved NTP sources or equivalent.
- 3.2 Ensure that all systems synchronize their clocks at defined intervals and that any drift is detected and corrected automatically or with minimal intervention.
- 3.3 Maintain clock accuracy across hybrid, on-premises, and cloud environments to enable:
 - 3.3.1 Reliable event correlation and incident response
 - 3.3.2 Regulatory compliance with standards such as ISO 27001, GDPR, NIS2, and DORA
 - 3.3.3 Protection against replay attacks and time-based authentication failures
- 3.4 Establish clear roles, exception handling procedures, and audit mechanisms to maintain policy enforcement.
- 3.5 Ensure that time-related anomalies are logged, alerted upon, and escalated when exceeding tolerances.

4. Roles and Responsibilities

- 4.1 **Chief Information Security Officer (CISO)**
 - 4.1.1 Owns this policy and ensures alignment with ISMS operational controls and regulatory requirements.
 - 4.1.2 Approves enterprise time source selection and validates time synchronization reporting processes.
- 4.2 **Infrastructure Services Manager / Network Engineering Lead**

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4.2.1 Maintains the organization’s primary and secondary NTP servers or designated time source configuration.

[.....]

11. Reference Standards and Frameworks

ISO/IEC 27001:2022

Clause 8.1 – Operational Planning and Control: Requires integration of accurate technical controls such as synchronized system clocks for reliable operational execution.

ISO/IEC 27002:2022 – Control 8.17

Reinforces clock accuracy and mandates organizational consistency of system time to facilitate log comparison, investigation, and secure transaction validation.

NIST SP 800-53 Rev.5

SC-45 – System Time Synchronization: Requires time synchronization using authoritative sources across all components within a system boundary.

AU-8 – Time Stamps: Ensures events are accurately timestamped and provides traceability for audit and incident response.

EU GDPR (2016/679)

Article 32 – Security of Processing: While not explicitly citing time, mandates the use of appropriate technical measures—including audit trails and logs—that inherently depend on synchronized timestamps for validity and integrity.

EU NIS2 Directive (2022/2555)

Article 21(2)(e): Requires logging and detection capabilities which presuppose accurate time synchronization for cross-system correlation and timely response.

EU DORA (2022/2554)

Article 9 – ICT Risk Management: Mandates accurate system telemetry for risk monitoring and anomaly detection, which depends on precise clock synchronization.

Article 10 – ICT Business Continuity: Enforces controls ensuring system integrity during disruptions, including time-aligned event records.

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DSS05.04 – Monitor Security Events: Requires timestamp integrity for effective log analysis and threat detection.

MEA03 – Monitor, Evaluate, and Assess Compliance: Time synchronization supports accurate compliance auditing and reporting cycles.

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