Review of ISO 9001:2015 and ISO 27001:2013 Implementation in Financial Institution – Case Study

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Abstract - In today's technologically-driven world, protecting ICTs (Information and Communication Technologies) is of great importance. Due to the amount of personal data and the obligations of high transaction accuracy, financial institutions such as banks and insurance companies are even more sensitive to data protection. On the business side, ICT is fundamental for day-to-day operations, so investing in ICT is investing in business continuity, operating and resilience. Integration of ISO 27001:2013 and ISO 9001:2015 standards into an organization's Information Security Management System (ISMS) and Quality Management System (QMS), respectively, further enhances the importance of protecting ICT. It is also important for organizations to implement these standards as a useful baseline for further compliances, such as for example GDPR (General Data Protection Regulation). These standards provide a framework for continually improving management systems in critical areas, which is just one more reason for implementation.

Keywords – Audit, ISO 9001:2015, ISO 27001:2013, Information Security Management Systems

I. INTRODUCTION

The common tool to perform data security risk assessment is ISO 27001, the international standard for an information security management system [1]. It emphasizes a risk-based approach to information security. The standard analyzes information security from the following 12 levels: 1. Security of organizational information; 2. Security of human resources; 3. Asset management; 4. Logical security; 5. Cryptography; 6. Security of operations; 7. Security of communications; 8. Security of development environments; 9. Security in the management of suppliers; 10. Safety from the aspect of occurrence and resolution of incidents; 11. Business continuity; 12. Compliance with legal regulations. It requires organizations to identify, assess, and manage information security risks systematically. This is particularly relevant to ICT, where the evolving threat landscape requires proactive measures to identify and mitigate potential vulnerabilities [2]. ISO 27001 helps organizations ensure compliance with legal and

regulatory requirements related to information security. This is crucial for protecting sensitive data stored and processed through ICT systems.

ISO 9001:2015 is the base for Quality Management System (QMS) implementation. Companies implement quality procedures and devise policies aiming to increase customer satisfaction and ensure the consistency of their practices. In the ICT sector, where organizations often rely on complex supply chains, ISO 9001 can help manage quality across the supply chain [3]. Both ISO 27001 and ISO 9001 encourage process-oriented thinking. Integrating the QMS and ISMS ensures that processes related to information security and quality management are aligned, and they simplify and improve business processes.

This paper provides GAP analyzis of an existing organization and potential recommendation for any further ISO 9001:2015 and ISO 27001:2013 implementations. The complete research has been done in Lovcen Bank ad Podgorica, which is 6th bank by size in Montenegro according to the report of Central Bank of Montenegro. During the research, authors had access to all business and IT systems together with a relevant literature. The duration of research was 120 working days. This paper coud be used as base for furher cases in banks and insurance companies.

First chapter of this paper explains standards and motivation for writing this paper. Section II is for ISO9001:2015 GAP analysis. In Section III we provide GAP analysis for ISO 27001:2013. Discussion is presented in Section IV. Section V is for conclusion and future analysis.

II. GAP ANALYSIS FOR ISO 9001:2015

This analysis helped identify areas where existing organization met the standard's criteria and areas where there are gaps that needed to be addressed for compliance.

TABLE I. GAP ANALYSIS FOR ISO 9001:2015

Standard	ISO 0001	
requirement (ISO	2015	Implemented YES/NO
9001:2015) - QMIS	clauses	
Understanding organization and it's context	4.1	Yes. Defined through strategic planning
Understanding the	4.2	Yes. Defined through strategic
of interested parties		planning
Determining the scope	4.3	Yes. Organization has clearly
of the quality management system		implementation of the QMS
Quality management	4.4	No. There is no process scheme,
system and its		scheme, no business process
L and archin and	5.1	management tool. Recommended
Commitment	5.1	Tes. Decission management
General Customer focus	5.1.1	Yes. Decission management
Customer rocus	5.2	Mandatory to implement in
Policy		accordance with the requirements of the ISO 9001 standard
Establish the quality	5.2.1	Mandatory to implement in accordance with the requirements
policy		of the ISO 9001 standard
Communicating the	5.2.2	Mandatory to implement in accordance with the requirements
Quality Policy	5.2	of the ISO 9001 standard
responsibilities, and	5.3	Company's organization scheme
authorities	6.1	Mandatory to implement in
Actions to address	0.1	accordance with the requirements
Ovality abiastivas and	6.2	of the ISO 9001 standard
planning to achieve	0.2	accordance with the requirements
them Planning of abangas	6.2	of the ISO 9001 standard
Resources	7.1	Human resources policy
General	7.1.1	Human resources policy
People	7.1.2	Human resources poncy
Infrastructure	7.1.3	Yes. Existing contract
Monitoring and Measuring Resources	7.1.5	Human resources policy
Competence	7.2	Human resources policy
Awareness	7.3	Human resources policy
Documented	7.5	No Document Management
information		System. Recommended
General	7.5.1	System. Recommended
Creating and updating	7.5.2	No Document Management
Control of Documented	7.5.3	No Document Management
Information	0.1	System. Recommended
and control	8.1	Existing policies and procedures
Requirements for	8.2	New product procedure. Project
Customer	8.2.1	New product procedure. Project
communication	800	Management
requirements for	6.2.2	Project Management
products and services	800	Now product pressdant Dest
requirements for products and services	8.2.3	Management
Design & Development of products & services	8.3	Mandatory to implement in accordance with the requirements of the ISO 9001 standard
General	8.3.1	Mandatory to implement in accordance with the requirements of the ISO 9001 standard

	0.0.0	
Design & Development	8.3.2,	Mandatory to implement in
alenning inputs	8.3.3,	accordance with the requirements
planning, inputs,	8.3.4,	of the ISO 9001 standard
control, outputs	8.3.5	
-	836	Mandatory to implement in
Design & Development	0.5.0	accordance with the requirements
Changes		
		of the ISO 9001 standard
Control of externally	8.4	Supply chain management
provided processes,		procedure
products and services		•
1	841	Supply chain management
General	0.4.1	Suppry chain management
		procedure
Type and Extent of	8.4.2	Supply chain management
control		procedure
Information for	8.4.3	Supply chain management
external providers		procedure
Deceluation and complete	05	New meduat measure Designt
Floduction and service	0.5	New product procedure. Project
provision		Management
Control of production	8.5.1	New product procedure. Project
and service provision		Management
Identification and	852	New product procedure Project
traceability	0.0.2	Management
Draw and the 1	0.5.0	Management
Property belonging to	8.5.3	New product procedure. Project
customer or external		Management
providers		
	8.5.4	New product procedure. Project
Preservation		Management
	055	Normanagement
Post-delivery activities	8.3.3	New product procedure. Project
		Management
Control of changes	8.5.6	Change management
Release of products	8.6	No. Qualitative tests defined in
and services		A 14 in ISO 27001.2013
Control of	07	Mandatory to implement in
	0.7	Mandatory to implement in
Nonconforming		accordance with the requirements
Outputs		of the ISO 9001 standard
Monitoring,	9.1	Mandatory to implement in
measurement, analysis		accordance with the requirements
and evaluation		of the ISO 9001 standard
and evaluation	0.1.1	Dragodyna for monoping alignt
General	9.1.1	riocedule for managing chem
		objections
Evaluation of	9.1.2	Procedure for managing client
Compliance		objections
	9.1.3	Mandatory to implement in
Analysis and		accordance with the requirements
Evaluation		of the ISO 9001 standard
	0.2	Mandatama ta inglanant in
	9.2	Mandatory to implement in
Internal audit		accordance with the requirements
		of the ISO 9001 standard
	9.3	Mandatory to implement in
Management review		accordance with the requirements
		of the ISO 9001 standard
	0.2.1	Mandatama ta inglamant in
	9.3.1	Mandatory to implement in
General		accordance with the requirements
		of the ISO 9001 standard
X	9.3.2	Mandatory to implement in
Management review		accordance with the requirements
inputs		of the ISO 9001 standard
	022	Mandatany to implement in
Management Review	9.3.3	Mandatory to implement in
Outputs		accordance with the requirements
ouputo		of the ISO 9001 standard
	10.1	Mandatory to implement in
General		accordance with the requirements
		of the ISO 9001 standard
	10.2	Mondotomy to instandard
Nonconformity and	10.2	iviandatory to implement in
corrective actions		accordance with the requirements
		of the ISO 9001 standard
Gentingel	10.3	Mandatory to implement in
Continual		accordance with the requirements
improvement		of the ISO 9001 standard

Statistics for ISO9001:2015 implementation in this company:

- Sucessfully implemented controls (100%): count: 34, success rate: 58,87%
- Partially implemented controls (50%), count: 5
- Unimplemented controls (0%): count 23, success rate: 41,13%.

Total ISO9001:2015 realization rate is 58,87%.

III. GAP ANALYSIS FOR ISO 27001:2013

The table below lists the requirements of the ISO 27001:2013 standard with proof of whether the implementation was successfully implemented in the business environment of the observed company.

TABLE II. GAP ANALYSIS FOR ISO 27001:2013

Standard requirement (ISO27001:2013) - ISMS	ISO 27001: 2013 clauses	Implemented YES/NO
Has company defined internal and external context for the ISMS system	4.1	Yes. Defined through strategic planning
Has company defined the understanding and expectations of all interested parties for the implementation of the ISMS system	4.2	Yes. Defined through strategic planning
Has company clearly defined the scope for the implementation and application of the ISMS system	4.3	Yes. Company has clearly definde scope for the implementation and application of the ISMS system
Are there clearly defined roles, responsibilities and authorities in teh company from the aspect of implementing the ISMS system	5.3	Organizational chart for IT and Information Security
Has company defined all possible threats to strategic information assets	6.1.2	Procedure for risk management in the information system Procedure for operational risks
Is there a defined and documented best practice for the realization of real Threat Management Systems?	6.1.2	Procedure for risk management in the information system Procedure for operational risks
Has company defined all possible vulnerabilities on strategic information assets	6.1.2	Mandatory to implement in accordance with the requirements of the ISO 27001 standard
Is there a defined and documented best practice for the realization of real Vulnerability Management Systems	6.1.2	Mandatory to implement in accordance with the requirements of the ISO 27001 standard
Has company performed an evaluation of threats to strategic information assets	6.1.2	Mandatory to implement in accordance with the requirements of the ISO 27001 standard
Has company performed a vulnerability evaluation of strategic information assets	6.1.2	Mandatory to implement in accordance with the requirements of the ISO 27001 standard
Has comapny determined risk factors as well as levels for successful resolution of all risks	6.1.2	Mandatory to implement in accordance with the requirements of the ISO 27001 standard
Are the Risk Owners determined?	6.1.2	Mandatory to implement in accordance with the requirements of the ISO 27001 standard
Is there a defined Risk Treatment Plan for risks with indicated: risk management activities, risk owners, level of risk management, time period required for risk management	6.1.3	There is a Register for risk management Report on Risk Assessment
Are the Information Security Objectives defined with indicated activities and metrics for measuring them	6.2	Mandatory to implement in accordance with the requirements of the ISO 27001 standard
Has company defined a procedure for managing documents	7.5.1, 7.5.2, 7.5.3	Document management procedure
Has company defined a procedure for managing data records	7.5.1, 7.5.2, 7.5.3	Document management procedure
Is there a defined metric with clearly displayed KPIs for all points of the standard: A.5 – A.18	9.1	Mandatory to implement in accordance with the requirements of the ISO 27001 standard

Is there a defined methodology	9.1	
for measuring metrics	0.1	Mondotomy to implement
of the metrics and critical	9.1	in accordance with the
deviations from the desired		requirements of the ISO
ones		27001 standard
Is there a defined internal audit	9.2	Mandatory to implement
forms: order program		requirements of the ISO
checklists, etc.		27001 standard
Are there any results of an	9.2	Mandatory to implement
internal audit with a clear		in accordance with the
internal audit report?		27001 standard
Is there a defined procedure for	10.1	Mandatory to implement
managing non-conformities		in accordance with the
forms		27001 standard
Is there a defined procedure for	10.1	Mandatory to implement
the management of corrective		in accordance with the
measures together with the		27001 standard
Is there a plan for continuous	10.2	Mandatory to implement
improvement of the ISMS		in accordance with the
system after the completion of		requirements of the ISO
metric measurements, internal		27001 Standard
Has the Information Security	A.5.1.1	Information security
Policy been defined and		policy
officially published?		
Is the review procedure defined	A.5.1.2, 9.3	in accordance with the
by the administration?		requirements of the ISO
	4512	27001 standard
Was the review carried out by	A.3.1.2, 9.3	in accordance with the
the management?		requirements of the ISO
Are security roles defined in	A 6 1 1	27001 standard Organizational chart
the management of the ISMS	A.6.1.2,	Workplaces
system with clear obligations to	A.6.1.3,	systematization
the regulatory authorities in	A.0.1.4	
Le there e defined preject	A.6.1.5	Mandatory to implement
is there a defined project management procedure from		in accordance with the
the aspect of the ISMS system		requirements of the ISO 27001 standard
Is the Mobile Device	A.6.2.1	Mandatory to implement
Management Policy defined		in accordance with the
and published?		27001 standard
Is the Remote Work Policy	A.6.2.2	The procedure of remote
defined and published?		access to the information
		Code of Business
	A.7.1.1,	
	A.7.1.1, A.7.1.2	Conduct - Code of Ethics
Are the recruitment criteria	A.7.1.1, A.7.1.2	Conduct - Code of Ethics Rulebook on disciplinary procedure
Are the recruitment criteria defined in the Employment Regulations from the point of	A.7.1.1, A.7.1.2	Conduct - Code of Ethics Rulebook on disciplinary procedure Statements on getting to
Are the recruitment criteria defined in the Employment Regulations from the point of view of the ISMS system?	A.7.1.1, A.7.1.2	Conduct - Code of Ethics Rulebook on disciplinary procedure Statements on getting to know each other during
Are the recruitment criteria defined in the Employment Regulations from the point of view of the ISMS system?	A.7.1.1, A.7.1.2	Conduct - Code of Ethics Rulebook on disciplinary procedure Statements on getting to know each other during the employment relationship
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Are the recruitment criteria defined in the Employment Regulations from the point of view of the ISMS system?	A.7.1.1, A.7.1.2	Conduct - Code of Ethics Rulebook on disciplinary procedure Statements on getting to know each other during the employment relationship Disciplinary procedure Code of Business Conduct - Code of Ethics
Are the recruitment criteria defined in the Employment Regulations from the point of view of the ISMS system?	A.7.1.1, A.7.1.2	Conduct - Code of Ethics Rulebook on disciplinary procedure Statements on getting to know each other during the employment relationship Disciplinary procedure Code of Business Conduct - Code of Ethics Rulebook on disciplinary
Are the recruitment criteria defined in the Employment Regulations from the point of view of the ISMS system? Have all employees sign a statement that they are familiar	A.7.1.1, A.7.1.2	Conduct - Code of Ethics Rulebook on disciplinary procedure Statements on getting to know each other during the employment relationship Disciplinary procedure Code of Business Conduct - Code of Ethics Rulebook on disciplinary procedure
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	A 7 3 1	Code of Business
	110000	Conduct - Code of Ethics
Ano the employee's chlications		Rulebook on disciplinary
Afe the employee's obligations		procedure
after the termination of the		Statements on getting to
stated?		know each other during
stated?		the employment
		relationship
		Disciplinary procedure
Has a list been made of all	A.8.1.1	List of IT assets
strategic information assets in		
the company including:		
servers, routers, switches,		
computers, network equipment,		
databases, operating systems,		
printers, scanners, IP cameras		
and other security equipment		
For the completed list of	A.8.1.2	List of IT assets
strategic information assets,		
has it been determined who are		
the owners of these assets and		
have the owners signed the		
takeover of all assets?		
Is there a defined procedure for	A.8.1.3	List of IT assets
acceptable use of the property		
along with acceptable forms		
Is there a defined property	A.8.1.4	List of IT assets
recovery procedure along with		
acceptable forms		
Has the data been classified?	A.8.2.1	No Data Classification
The information needs to be		System - recommended
sorted into several basic		No Data Loss Prevention
categories.		System - recommended
Whether all classified	A.8.2.2	Data classification
information has been		procedure
successfully tagged		
Is there a defined procedure for	A.8.2.3	Data classification
property management together		procedure
with the associated forms		-
	A.8.3.1	Procedures criteria and
Is there a defined procedure for		method of deleting data
managing portable media?		from the medium
Is there a defined measure for	A.8.3.2	Mandatory to implement
dispessing of modio together		in accordance with the
disposing of media together		requirements of the ISO
with the associated forms		27001 standard
Is there a defined procedure for	A.8.3.3	Mandatory to implement
the physical transfer of media		in accordance with the
together with the associated		requirements of the ISO
forms		27001 standard
Is the policy for access control	A.9.1.1	Information system
defined?		access procedure
Has a documented best practice	A.9.1.2	Yes
been introduced for introducing		
a Firewall into the intranet and		
extranet network of the		
company		
	A.9.2.1,	Information system
Has a procedure for user	A.9.2.2,	access procedure
registration and deregistration	A.9.2.3,	
and management of their	A.9.2.4,	
access been introduced?	A.9.2.5,	
	A.9.2.6	
Has a procedure been	A.9.4.1,	Information system
introduced to control access to	A.9.4.2,	access procedure
information as well as manage	A.9.4.3,	
user access together with the	A.9.4.4,	
associated forms	A.9.4.5	
Is there a documented best	A.9.4.5	Code is outsourced
practice for performing code		
analysis in all application		
solutions		
Has a password management	A.9.4.3	Password Management
policy been defined?		Policy
Is there a documented best	A.9.4.2	Mandatory to implement
practice for conducting		in accordance with the
penetration tests on all		requirements of the ISO
information systems	1	27001 standard
Has the Policy for the use of		
Thas the Foney for the use of	A.10.1.1	Procedure for the use of
cryptographic controls been	A.10.1.1	Procedure for the use of cryptographic controls.
cryptographic controls been	A.10.1.1	Procedure for the use of cryptographic controls. Procedure needs to
cryptographic controls been defined?	A.10.1.1	Procedure for the use of cryptographic controls. Procedure needs to become policy
cryptographic controls been defined? Has the Policy for the use of	A.10.1.1 A.10.1.2	Procedure for the use of cryptographic controls. Procedure needs to become policy Procedure for the use of
cryptographic controls been defined? Has the Policy for the use of cryptographic keys been	A.10.1.1 A.10.1.2	Procedure for the use of cryptographic controls. Procedure needs to become policy Procedure for the use of cryptographic controls.
cryptographic controls been defined? Has the Policy for the use of cryptographic keys been defined?	A.10.1.1 A.10.1.2	Procedure for the use of cryptographic controls. Procedure needs to become policy Procedure for the use of cryptographic controls. Procedure needs to

Is there a document with	A.11.1.1	Mandatory to implement
clearly shown separation zones	A.11.1.5	in accordance with the requirements of the ISO
in the company		27001 standard
Are there defined Disaster	A.11.1.3	Mandatory to implement
Recovery Plans for protection	A.11.1.4	in accordance with the
other natural disasters		27001 standard
Is there a documented best	A.11.1.6	Mandatory to implement
practice for performing		in accordance with the
quantitative and qualitative		requirements of the ISO
work as a place of delivery and		27001 standard
Ioading	A 11 2 2	Procedures criteria and
practices for maintaining UPS	A.11.2.2	method of deleting data
systems and air conditioning		from the medium
systems in data centers?		
Is there a documented best	A.11.2.3	Yes
specifically for UPS cables		
specifically for 013 cables	A.11.2.4	Mandatory to implement
Is there a defined procedure for taking equipment outside the		in accordance with the
company		requirements of the ISO
Is there a decumented best	A 11 2 5	2/001 standard
practice for safe disposal of	A.11.2.3	in accordance with the
equipment and for monitoring		requirements of the ISO
equipment outside the company		27001 standard
To these a defined -1 d1	A.11.2.9	Mandatory to implement
and blank screen policy?		in accordance with the requirements of the ISO
and orank serven policy:		27001 standard
Is there a defined change	A.12.1.2	Change management
management procedure with		procedure
clearly defined and included		
changes and types of changes		
Is there a defined capacity	A.12.1.3	Mandatory to implement
management procedure with		in accordance with the
clearly indicated capacity plans		requirements of the ISO
and their planning?		27001 standard
Is there a defined procedure for	A.12.1.4	procedure for separating
test environments		environments
Is there a defined policy for	A.12.2.1	Antivirus procedure
managing antivirus solutions		
Is there a documented best	A.12.2.1	Antivirus procedure
solutions and their use in		
company		
Is there a defined Backup	A.12.3.1	Backup procedure
Management Policy		
Management Policy Is there a defined log	A.12.4.2	Event management
Management Policy Is there a defined log management policy with administrator and operator log	A.12.4.2 A.12.4.3	Event management procedure
Management Policy Is there a defined log management policy with administrator and operator log management practices	A.12.4.2 A.12.4.3	Event management procedure
Management Policy Is there a defined log management policy with administrator and operator log management practices Is there a unique form in the	A.12.4.2 A.12.4.3 A.12.4.4	Event management procedure Domain controller
Management Policy Is there a defined log management policy with administrator and operator log management practices Is there a unique form in the company where it is recorded	A.12.4.2 A.12.4.3 A.12.4.4	Event management procedure Domain controller
Management Policy Is there a defined log management policy with administrator and operator log management practices Is there a unique form in the company where it is recorded Is there a defined policy with	A.12.4.2 A.12.4.3 A.12.4.4 A.12.5.1	Event management procedure Domain controller Mandatory to implement
Management Policy Is there a defined log management policy with administrator and operator log management practices Is there a unique form in the company where it is recorded Is there a defined policy with clear descriptions of which operating systems are allowed	A.12.4.2 A.12.4.3 A.12.4.4 A.12.5.1	Event management procedure Domain controller Mandatory to implement in accordance with the requirements of the ISO
Management Policy Is there a defined log management policy with administrator and operator log management practices Is there a unique form in the company where it is recorded Is there a defined policy with clear descriptions of which operating systems are allowed in the company	A.12.4.2 A.12.4.3 A.12.4.4 A.12.5.1	Event management procedure Domain controller Mandatory to implement in accordance with the requirements of the ISO 27001 standard
Management Policy Is there a defined log management policy with administrator and operator log management practices Is there a unique form in the company where it is recorded Is there a defined policy with clear descriptions of which operating systems are allowed in the company Is there a unique form in	A.12.4.2 A.12.4.3 A.12.4.4 A.12.5.1	Event management procedure Domain controller Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement
Management Policy Is there a defined log management policy with administrator and operator log management practices Is there a unique form in the company where it is recorded Is there a defined policy with clear descriptions of which operating systems are allowed in the company Is there a unique form in Company where it is recorded	A.12.4.2 A.12.4.3 A.12.4.4 A.12.5.1 A.12.5.1	Event management procedure Domain controller Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the
Management Policy Is there a defined log management policy with administrator and operator log management practices Is there a unique form in the company where it is recorded Is there a defined policy with clear descriptions of which operating systems are allowed in the company Is there a unique form in Company where it is recorded which operating systems are	A.12.4.2 A.12.4.3 A.12.4.4 A.12.5.1 A.12.5.1	Event management procedure Domain controller Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 2700 is underd
Management Policy Is there a defined log management policy with administrator and operator log management practices Is there a unique form in the company where it is recorded Is there a defined policy with clear descriptions of which operating systems are allowed in the company Is there a unique form in Company where it is recorded which operating systems are installed on servers and PCs Is there a documented best	A.12.4.2 A.12.4.3 A.12.4.4 A.12.5.1 A.12.5.1	Event management procedure Domain controller Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement
Management Policy Is there a defined log management policy with administrator and operator log management practices Is there a unique form in the company where it is recorded Is there a defined policy with clear descriptions of which operating systems are allowed in the company Is there a unique form in Company where it is recorded which operating systems are installed on servers and PCs Is there a documented best practice related to restrictions	A.12.4.2 A.12.4.3 A.12.4.4 A.12.5.1 A.12.5.1 A.12.6.2	Event management procedure Domain controller Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the
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Management Policy Is there a defined log management policy with administrator and operator log management practices Is there a unique form in the company where it is recorded Is there a defined policy with clear descriptions of which operating systems are allowed in the company Is there a unique form in Company where it is recorded which operating systems are installed on servers and PCs Is there a documented best practice related to restrictions on software installations on all strategic information assets Is there a defined procedure for	A.12.4.2 A.12.4.3 A.12.4.4 A.12.5.1 A.12.5.1 A.12.6.2 A.12.7.1	Event management procedure Domain controller Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Internal audit procedure
Management Policy Is there a defined log management policy with administrator and operator log management practices Is there a unique form in the company where it is recorded Is there a defined policy with clear descriptions of which operating systems are allowed in the company Is there a unique form in Company where it is recorded which operating systems are installed on servers and PCs Is there a documented best practice related to restrictions on software installations on all strategic information assets Is there a defined procedure for the audit (revision) of	A.12.4.2 A.12.4.3 A.12.4.4 A.12.5.1 A.12.5.1 A.12.6.2 A.12.7.1	Event management procedure Domain controller Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Internal audit procedure
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Management Policy Is there a defined log management policy with administrator and operator log management practices Is there a unique form in the company where it is recorded Is there a defined policy with clear descriptions of which operating systems are allowed in the company Is there a unique form in Company where it is recorded which operating systems are installed on servers and PCs Is there a documented best practice related to restrictions on software installations on all strategic information assets Is there a defined procedure for the audit (revision) of information systems and does it follow the recommendations of CobiT or ITIL and other similar methodologies	A.12.4.2 A.12.4.3 A.12.4.4 A.12.5.1 A.12.5.1 A.12.6.2 A.12.7.1	Event management procedure Domain controller Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Internal audit procedure
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Management Policy Is there a defined log management policy with administrator and operator log management practices Is there a unique form in the company where it is recorded Is there a defined policy with clear descriptions of which operating systems are allowed in the company Is there a unique form in Company where it is recorded which operating systems are installed on servers and PCs Is there a documented best practice related to restrictions on software installations on all strategic information assets Is there a defined procedure for the audit (revision) of information systems and does it follow the recommendations of CobiT or ITIL and other similar methodologies Is there a defined procedure for the implementation and monitoring of nature the	A.12.4.2 A.12.4.3 A.12.4.4 A.12.5.1 A.12.5.1 A.12.5.1 A.12.6.2 A.12.7.1 A.13.1.1 A.13.1.2 A.13.1.3	Event management procedure Domain controller Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Internal audit procedure Mandatory to implement in accordance with the requirements of the ISO
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Management Policy Is there a defined log management policy with administrator and operator log management practices Is there a unique form in the company where it is recorded Is there a defined policy with clear descriptions of which operating systems are allowed in the company Is there a unique form in Company where it is recorded which operating systems are installed on servers and PCs Is there a documented best practice related to restrictions on software installations on all strategic information assets Is there a defined procedure for the audit (revision) of information systems and does it follow the recommendations of CobiT or ITIL and other similar methodologies Is there a defined procedure for the implementation and monitoring of network segregation and domains in the network of the company	A.12.4.2 A.12.4.3 A.12.4.4 A.12.5.1 A.12.5.1 A.12.5.1 A.12.6.2 A.12.7.1 A.13.1.1 A.13.1.2 A.13.1.3	Event management procedure Domain controller Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Internal audit procedure Mandatory to implement in accordance with the requirements of the ISO 27001 standard
Management Policy Is there a defined log management policy with administrator and operator log management practices Is there a unique form in the company where it is recorded Is there a defined policy with clear descriptions of which operating systems are allowed in the company Is there a unique form in Company where it is recorded which operating systems are installed on servers and PCs Is there a decumented best practice related to restrictions on software installations on all strategic information assets Is there a defined procedure for the audit (revision) of information systems and does it follow the recommendations of CobiT or ITIL and other similar methodologies Is there a defined procedure for the implementation and monitoring of network segregation and domains in the network of the company Is there a defined policy for the	A.12.4.2 A.12.4.3 A.12.4.4 A.12.5.1 A.12.5.1 A.12.5.1 A.12.6.2 A.12.7.1 A.13.1.1 A.13.1.2 A.13.1.3 A.13.2.1	Event management procedure Domain controller Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Internal audit procedure Mandatory to implement in accordance with the requirements of the ISO 27001 standard Internal audit procedure
Management Policy Is there a defined log management policy with administrator and operator log management practices Is there a unique form in the company where it is recorded Is there a defined policy with clear descriptions of which operating systems are allowed in the company Is there a unique form in Company where it is recorded which operating systems are installed on servers and PCs Is there a documented best practice related to restrictions on software installations on all strategic information assets Is there a defined procedure for the audit (revision) of information systems and does it follow the recommendations of CobiT or ITIL and other similar methodologies Is there a defined procedure for the implementation and monitoring of network segregation and domains in the network of the company Is there a defined policy for the transfer of information	A.12.4.2 A.12.4.3 A.12.4.4 A.12.5.1 A.12.5.1 A.12.5.1 A.12.6.2 A.12.7.1 A.13.1.1 A.13.1.2 A.13.1.3 A.13.2.1	Event management procedure Domain controller Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Internal audit procedure Mandatory to implement in accordance with the requirements of the ISO 27001 standard Internal audit procedure Excluded. Impossible to implement in this

Are there defined internal	A.13.2.2	Mandatory to implement
agreements in the company		in accordance with the
related to the transfer of		27001 standard
Operation Level Agreement		
agreements		
Is there a Rulebook with clearly	A.13.2.3	Mandatory to implement
defined activities on		requirements of the ISO
maintaining the e-mail service		27001 standard
Are there defined Non-	A.13.2.4	Mandatory to implement
Disclosure Agreements with		in accordance with the
third parties and suppliers		27001 standard
Is there a documented best	A.14.1.3	Excluded. Impossible to
practice for the protection of all		implement in this
application transactions in the		company
company		
Is there a defined Safe	A.14.2.1	Excluded. Impossible to
Development Policy?		implement in this
Is there a defined Policy for	A 14 2 5	company Instructions for
separating the pre-production	A.14.2.6	refreshing the test and
from the Production		development
environment		environment
Is there a defined procedure	A.14.2.7	Mandatory to implement
with associated forms for monitoring the externalized		requirements of the ISO
development of application		27001 standard
solutions		
	A.14.2.8	Mandatory to implement
	A.14.2.9	in accordance with the requirements of the ISO
Is there a defined procedure for		27001 standard. It is
as selecting test data for each		mandatory to have a
system test		defined procedure for
		well as selecting test data
		for each system test.
Is there a defined list of criteria	A.14.3.1	Mandatory to implement
for qualitative tests by		in accordance with the requirements of the ISO
information assets: servers.		27001 standard
routers, switches, PCs, printers,		
scanners, IP cameras, security		
systems, databases, operating		
systems, etc.	A 15 1.1	Mandatory to implement
	11.10	in accordance with the
Is there a defined Information		requirements of the ISO
Security Policy for supplier		27001 standard. It is mandatory to have a
management?		defined Information
		Security Policy for
Are there documented security	Δ 15 1 2	supplier management Mandatory to implement
parameters that are an integral	A.13.1.2	in accordance with the
part of every contract with		requirements of the ISO
suppliers		
Does company have a		27001 standard
documented chain of suppliers	A.15.1.3	27001 standard Mandatory to implement
in terms of monitoring the	A.15.1.3	27001 standard Mandatory to implement in accordance with the requirements of the ISO
in terms of monitoring the work of suppliers and	A.15.1.3	27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard
in terms of monitoring the work of suppliers and subcontractors	A.15.1.3	27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard
in terms of monitoring the work of suppliers and subcontractors Are there generally defined	A.15.1.3 A.15.2.1	27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement
in terms of monitoring the work of suppliers and subcontractors Are there generally defined tests for selecting suppliers	A.15.1.3 A.15.2.1	27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO
in terms of monitoring the work of suppliers and subcontractors Are there generally defined tests for selecting suppliers from the aspect of ISMS systems and information	A.15.1.3 A.15.2.1	27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard
in terms of monitoring the work of suppliers and subcontractors Are there generally defined tests for selecting suppliers from the aspect of ISMS systems and information security in general	A.15.1.3	27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard
in terms of monitoring the work of suppliers and subcontractors Are there generally defined tests for selecting suppliers from the aspect of ISMS systems and information security in general Is there a defined procedure	A.15.1.3 A.15.2.1 A.15.2.2	27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement
in terms of monitoring the work of suppliers and subcontractors Are there generally defined tests for selecting suppliers from the aspect of ISMS systems and information security in general Is there a defined procedure with associated forms for	A.15.1.3 A.15.2.1 A.15.2.2	27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the
in terms of monitoring the work of suppliers and subcontractors Are there generally defined tests for selecting suppliers from the aspect of ISMS systems and information security in general Is there a defined procedure with associated forms for monitoring all changes that	A.15.1.3 A.15.2.1 A.15.2.2	27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard
in terms of monitoring the work of suppliers and subcontractors Are there generally defined tests for selecting suppliers from the aspect of ISMS systems and information security in general Is there a defined procedure with associated forms for monitoring all changes that occur at the supplier	A.15.1.3 A.15.2.1 A.15.2.2	27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Procedure for
in terms of monitoring the work of suppliers and subcontractors Are there generally defined tests for selecting suppliers from the aspect of ISMS systems and information security in general Is there a defined procedure with associated forms for monitoring all changes that occur at the supplier Is there a defined procedure for the management of security	A.15.1.3 A.15.2.1 A.15.2.2 A.16.1.1 A16.1.2,	27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Procedure for monitoring the situation
in terms of monitoring the work of suppliers and subcontractors Are there generally defined tests for selecting suppliers from the aspect of ISMS systems and information security in general Is there a defined procedure with associated forms for monitoring all changes that occur at the supplier Is there a defined procedure for the management of security incidents together with the	A.15.1.3 A.15.2.1 A.15.2.2 A.16.1.1 A16.1.2, A16.1.3,	27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Procedure for monitoring the situation and incidents in the IS
in terms of monitoring the work of suppliers and subcontractors Are there generally defined tests for selecting suppliers from the aspect of ISMS systems and information security in general Is there a defined procedure with associated forms for monitoring all changes that occur at the supplier Is there a defined procedure for the management of security incidents together with the associated forms and included:	A.15.1.3 A.15.2.1 A.15.2.2 A.16.1.1 A16.1.2, A16.1.3, A.16.1.4 A 16.1.5	27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Procedure for monitoring the situation and incidents in the IS with respect to the given
in terms of monitoring the work of suppliers and subcontractors Are there generally defined tests for selecting suppliers from the aspect of ISMS systems and information security in general Is there a defined procedure with associated forms for monitoring all changes that occur at the supplier Is there a defined procedure for the management of security incidents together with the associated forms and included: goals, activities,	A.15.1.3 A.15.2.1 A.15.2.2 A.16.1.1 A16.1.2, A16.1.3, A.16.1.4 A.16.1.5 A16.1.6,	27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Mandatory to implement in accordance with the requirements of the ISO 27001 standard Procedure for monitoring the situation and incidents in the IS with respect to the given recommendations
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Is there a defined procedure for managing business continuity together with the associated forms	A.17.1.1	Business Continuity Plan, Business Impact Analysis
Is there a defined procedure for managing the availability of all IT services together with the associated forms	A.17.1.2 A17.1.3	Business Continuity Plan, Business Impact Analysis
Is there a prepared and documented best practice for implementing redundancy for the internal systems	A.17.2.1	Business Continuity Plan, Business Impact Analysis
Is there a prepared and documented best practice for implementing geo redundancy?	A.17.2.1	Business Continuity Plan, Business Impact Analysis
Is there a defined procedure for identifying legal and legal regulations from the aspect of information security	A.18.1.1 A.18.1.2 A.18.1.5	Law on Protection of Personal Data of Montenegro Government regulation on information security of Montenegro Law on Banks of Montenegro Decision on minimum standards for operational risk management
Is there a defined procedure for testing technical compliance with the basic requirements of the ISMS system	A.18.2.3	Mandatory to implement in accordance with the requirements of the ISO 27001 standard. It is mandatory to have a defined procedure for testing technical compliance with the basic requirements of the ISMS system

Statistics for ISO27001:2013 implementation in this company:

- Sucessfully implemented controls (100%): count: 52, success rate: 54,08%
- Partially implemented controls (50%), count: 2
- Unimplemented controls (0%): count 44, success rate: 45,91%.

The total ISO27001:2013 realization rate is 54,08%.

IV. DISCUSSION

As the conclusion of both GAP analasysis for ISO9001:2015 and ISO27001:2023, realization rate was provided. It remains to be seen which of the five levels of criticality Company is in in terms of the implementation of these two standards. There are a total of five levels of criticality: critical, poor, satisfactory with mandatory implementation elements, satisfactory and excellent. The criticality level is found by finding the arithmetic sum of the measured values for the ISO 9001:2015 and ISO 27001:2013 standards, they are as follows:

Level of	Realization	Activities
criticality	rate	
Critical	0%-20%	Critical level of implementation of
		quality and information security
		within the Company. An urgent
		reaction of the Company's
		management is required.
Poor	21%-40%	There are basic elements of quality
		and information security
		implementation within the
		Company. A delayed reaction of
		the management is required.
Satisfactory	41%-60%	Satisfactory degree of
with mandatory		implementation of quality and
implementation		information security. No reaction
elements		from the company's management is
		required. The introduction of new
		documents and technical systems

		should be done periodically and with an established project plan.
Satisfactory	61%-80%	A very satisfactory degree of implementation of quality and information security. The introduction of new documents and technical systems should be done in accordance with the company's business needs.
Excellent	81%-100%	Excellent level of implementation of quality and information security. It is not necessary to introduce new documents or new technical systems.

Overall realization rate of ISO27001:2013 is 54,08% and ISO9001:2015 is 58,87%. The average for both standards is 56,48%. That means that level of qaulity implementation and information security is at the middle level of implementation, no immediate intervention of the company's management is required, but it is necessary to make a project time plan for both the implementation of documentation and the implementation of technical systems. The recommendation is to first complete staffing, then prepare policies and procedures, and only then implement the proposed technical systems.

V. CONCLUSION AND FUTURE RESEARCH

Some very important technical issues in the field of information security were not considered in the audit discussed in this paper, as they are not included in the version of the ISO 27001:2013 standard. Based on this practical methodological approach, it is therefore very important to include the following security controls in subsequent revisions of the ISO 27001:2013 standard. The use of the following policies and procedures is imperative based on experience in the banking sector and this is a concrete conclusion from this paper:

- Existence of a policy or procedure to prevent the outflow of data and information (Data Loss Prevention System)
- Continuous monitoring of vulnerabilities in technical systems (Vulnerability Management System)
- Monitoring of administrator rights (Privilege Access Management System)
- The existence of a Security Operations Center for 24/7 monitoring of potential security incidents that may occur (Security Operating Center)
- Existence of a policy or procedure that ensures the protection of data stored in the cloud
- Existence of a technical system for continuous 24/7 monitoring of security logs (Security Information and Event Management System)

With implementing and maintaining ISO9001:2015 and ISO27001:2013 standards, organizations can demonstrate their commitment to good information security practices, high-quality management systems, and the overall well-being of their stakeholders. This paper provided detailed step-by-step guide how to preform GAP analysis for financial institution, which can be used for any future research, and practical application. For observed company we demonstrated a satisfactory degree of implementation of quality and information security. No reaction from the company's management is required. The introduction of new documents and technical systems should be done periodically and with an established project plan.

Since the ISO 27001:2013 standard and the General Data Protection Regulation (GDPR) are both crucial frameworks that organizations often consider in their efforts to manage information security and data protection effectively, future research could connect and compare those two for financial institutions. Further research could explore how organizations can effectively tailor their approach to standard's implementation based on their specific needs.

In future research, it is necessary to use the strict recommendations for improving information security, which are listed in this paper. It is also necessary to use the recommendations of other standards or frameworks in the field of information security, specifically: COBIT, ITIL, ISO 22301, ISO 27014, ISO 27033, ISO 27701.

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