

ISMS Scoping Document

Umbraco A/S

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Content

1. Purpose.....	3
2. General.....	3
2.1. Assets.....	4
2.2. Locations.....	4
2.3. Organizational Units.....	4
2.4. Personnel.....	4
2.5. Justification for applicability.....	4
3. Scope Exclusions and Boundaries.....	5
4. Document revision.....	5
Version history.....	5
Appendix A – Context of the Organization.....	7
1. Purpose and objectives.....	7
2. Internal context.....	7
2.1 Organizational structure.....	7
2.2 Primary business processes/assets.....	7
1. External context.....	7
1.1. Political.....	8
1.2. Economic.....	8
1.3. Social.....	8
1.4. Technological.....	8
1.5. Environmental.....	8
1.6. Legal.....	8
Appendix B – Interested parties and their requirements.....	9
1. Internal parties.....	9
2. External parties.....	10
Appendix C – Interfaces and dependencies.....	11
Appendix D – Assets.....	11

1. Purpose

Umbraco A/S (Umbraco) has established an Information Security Management System (“ISMS”) in accordance with ISO/IEC 27001 (“ISO 27001”) that governs the processes required to protect company and information assets. This document specifies the scope of the ISMS at Umbraco, in order to enable a clear understanding of the boundaries of the ISMS, and to support the continual improvement of the ISMS by maintaining a set of appendices, outlining the context of the organization that is essential for the scope of the ISMS.

2. General

The following statements define the scope for ISMS.

The provision of a stable, predictable, secure and scalable open-source CMS platform, which enables both partners and user organizations to manage digital content on websites.

Services for Umbraco, that are included in the Scope of the ISMS.

- **Umbraco Cloud**
- **Umbraco Heartcore**

The scope of Umbraco ISMS includes the dependencies, assets, technologies and processes for the secure development and provisioning of these services.

Additionally, the scope is defined with consideration of the external and internal context of the organization (Appendix A), requirements of interested parties (Appendix B), such as customers and regulatory bodies, and boundaries with third parties (Appendix C).

2.1. Assets

The assets of the ISMS are further categorized as Software/Platform and Facility. The details of the assets can be found in Appendix D.

2.2. Locations

The following locations are in scope for the ISMS:

Umbraco HQ	
Umbraco HQ - Odense	Buchwaldsgade 35, 2. sal (second floor), 5000 Odense C

All other locations are considered as remote locations with regards to the ISMS and the supporting security controls.

2.3. Organizational Units

As the ISMS is focused on the secure development and provisioning of the services mentioned above, with a centralized organization with Umbraco HQ serving as the hub for all functions, the scope of the ISMS does not directly include or exclude specific organizational units, apart for those listed in chapter 3. Rather, the ISMS focuses on the actual contributors to the deliverables, regardless of organizational structure.

2.4. Personnel

All personnel that are involved in the provisioning of the included services or the supporting information security controls, whether employees or contractors, are in-scope for the ISMS.

Community contributions to the Open-Source Umbraco CMS Core are considered on par with supplier deliverables, and community members are as such not included in the scope of the ISMS.

2.5. Justification for applicability

In accordance with ISO/IEC 27001 requirements, each control listed in the Statement of Applicability shall include a justification for its applicability.

This justification is determined based on the outcome of the organization's risk assessment, relevant legal or regulatory obligations, and contractual requirements.

The three primary sources of justification are **Risk Management**, **Regulations**, and **Contracts**.

1. Risk Management

- a. Applicable because it addresses an identified information security risk.
2. Regulations
 - a. Required to comply with legal, statutory, or regulatory obligations.
3. Contracts
 - a. Mandated by external contractual commitments with clients, suppliers, or partners.

3. Scope Exclusions and Boundaries

- Umbraco A/S uses Microsoft Azure and Cloudflare to support its Cloud products. . This is provided as Infrastructure-as-a-Service. Microsoft and Cloudflare is responsible for managing logical access to the underlying network, Infrastructure management, and storage devices for its cloud service hosting Umbraco data.
- Microsoft and Cloudflare is responsible for the physical security and environmental controls at data centre facilities hosting Umbraco Services. Therefore, physical security and environmental controls are out of scope for those facilities.
- Umbraco A/S delivers its services as Platform-as-a-service. Umbraco A/S is therefore responsible for the secure provisioning of the platform and configurations within the scope of the platform. The customers and/or end-users are responsible for the implementation and use of the platform including, but not limited to: Data, applications, configuration and use of the platform.
- Umbraco A/S has service offerings to partners and end-user organizations. These are delivered as separate from the actual services listed in chapter 2, as such these services and the organizational units, assets and processes that are related to these services, Support, Training and Partner-programs, are out of scope for the ISMS.

4. Document revision

This document and its appendices are subject to yearly revision, as part of the performance evaluation and continual improvement processes of Umbraco. The yearly revision of the documents includes verification of the organizational context and a decision on maintaining or adjusting the scope and boundaries of the ISMS.

Any significant changes to the organizational context including, but not limited to, major changes in organization, new legal and regulatory requirements, major changes in external stakeholders, or the implementation of significantly new services or technologies, will also result in a revision of this document and its appendices.

Future document revisions are to be documented in the Umbraco Compliance Tool - "ComplyCloud".

Version history

Date	Author	Version	Changes	Approved by
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06-03-2025	<Unitas/ Umbraco>	1.0	Document creation	MTA
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Future document changes/ audits will be present within the ISMS system.

Appendix A – Context of the Organization

1. Purpose and objectives

Umbraco A/S is the unifying body of the Umbraco ecosystem, encompassing the open-source CMS, the community of partners, customers and developers, and the company itself. Umbraco strives to be the preferred CMS platform for partners and enterprise customers by 2030.

The overall objective of Umbraco is to enable partners and customers to utilize the Umbraco CMS as the foundation of their activities. To achieve this, Umbraco aims to ensure that the provided services and systems are *Stable, Predictable, Secure and Scalable*.

2. Internal context

2.1 Organizational structure

Umbraco is organized with a strong centralized core at Umbraco HQ. The various teams and departments are all based out of Umbraco HQ, and external consultants deliver directly into their respective teams.

There is a small subset of subsidiaries, mainly minor offices established in key markets. These primarily serve as points of presence in these markets, but all primary operations are consolidated into Umbraco HQ.

While this centralized organization does create a degree of dependence of Umbraco HQ from the various teams, this also serves as an opportunity to maintain a close connection between management and teams, thus enabling management to directly assess and impact the security culture of the organization, as well as being able to have easy and direct access to internal stakeholders.

2.2 Primary business processes/assets

Asset/Process	Description/Purpose
Development and operations processes	The development and operations processes are the main processes required to meet the objectives of Umbraco
Umbraco CMS - Source	While the Umbraco CMS is open source, it is crucial for Umbraco to maintain the integrity of the source in order to uphold and ensure the strategic objectives of Umbraco
Economic resource planning and management	Umbraco needs to keep financially stable in order to maintain operations. Furthermore, the “Open Books” approach could see detrimental effects, if significant security issues were to impact these processes

1. External context

The external context of Umbraco is analysed by utilizing the PESTEL (Political, Economic, Social, Technological, Environmental and Legal) method, to cover the primary external factors that are relevant to Umbraco.

1.1. Political

Umbraco operates in a long range of countries and across various different industries. Key markets are defined, but various trends in both international relations and local/national politics can influence Umbraco and partner organisation's ability to operate in some markets.

Umbraco utilizes a strong centralisation of the organization Umbraco HQ, in order to maintain control, and be able to shift focus on various markets and political influences from a consolidated position.

1.2. Economic

The current economic environment is somewhat influenced by international relations, but Umbraco's wide reach means that there are currently no major issues for either Umbraco or partners and/or end-users that impacts the ability to continue economic growth according to strategic objectives.

1.3. Social

Umbraco has incorporated social aspects into the sustainability approach. A strong cultural presence with regards to equal opportunities and healthy work environments, is a considerable asset in attracting and retaining talent in a highly competitive industry.

1.4. Technological

Umbraco is primarily utilizing Microsoft .NET as the development platform. While this platform is cross-platform, Umbraco is still reliant on the direction in technological development that is set by Microsoft. Umbraco is streamlining DevOps procedures to coincide with major releases from Microsoft.

1.5. Environmental

There is an ongoing trend towards higher environmental accountability across all industries. For Umbraco, this means that there is an increasing demand for environmental reporting. Umbraco has been active in reducing climate impact for a long time, so Umbraco is well suited to respond to increasing demands.

1.6. Legal

There are a variety of laws, regulations and compliance standards that may impact Umbraco's security objectives.

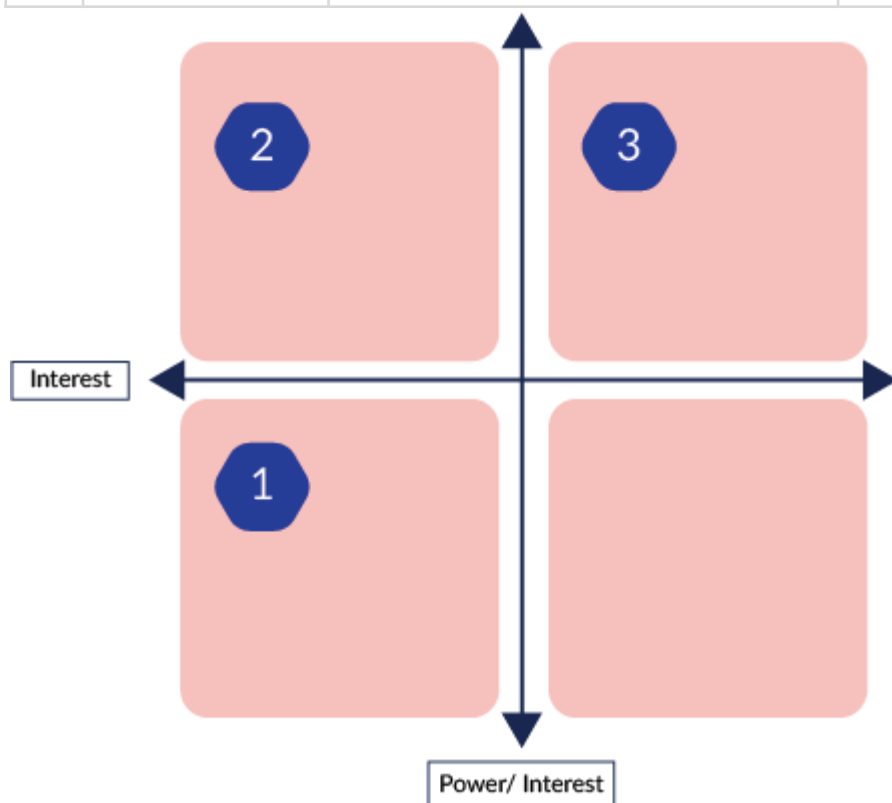
While Umbraco is directly regulated by some legislation such as GDPR, other regulations impact Umbraco through the requirements of customers. This includes areas such as DORA and CRA. Furthermore, contractual agreements can directly influence information security requirements.

The ISMS needs to be able to handle requests from multiple regulations and standards, but there is also a necessity for Umbraco to maintain a high degree of control with contractual obligations.

Appendix B – Interested parties and their requirements

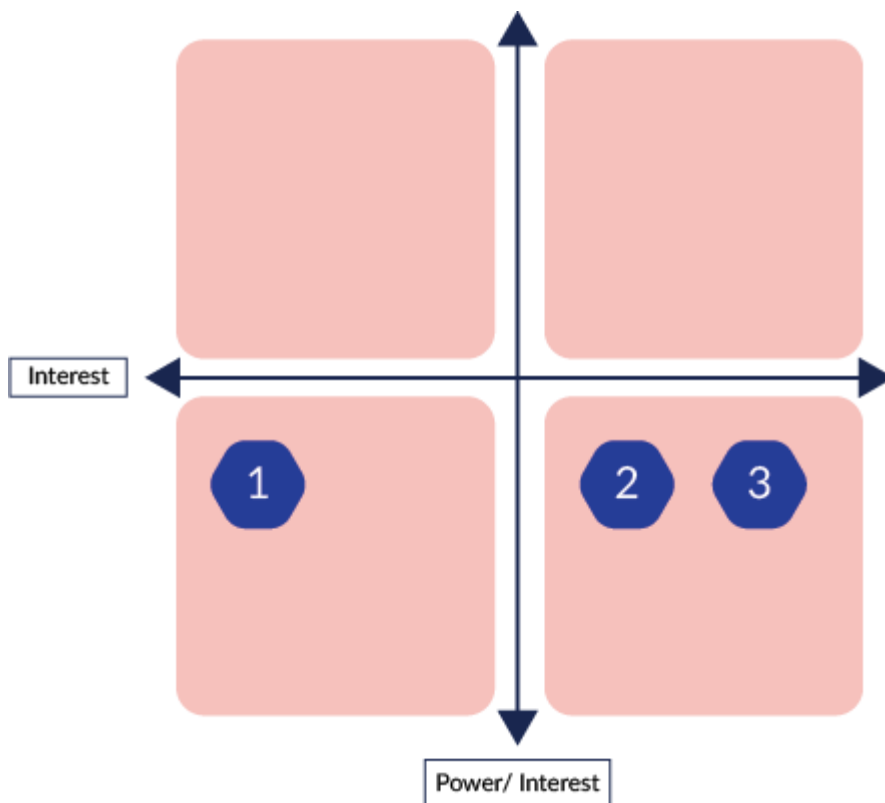
1. Internal parties

ID	Interested Party	Requirements	Impact on ISMS
1	Monterro	Requires Umbraco to continue its growth and financial profitability	The Risk management processes of the ISMS should reflect the need for stable growth rather than “high risk-high gain”
2	Board of Directors	Needs to be informed of major strategic issues including high level policies and risks, but are not generally putting forward strict requirements to information security	The ISMS should be focussed towards Umbraco HQ with a majority of policies anchored in management rather than Board of Directors. Management reviews should be regularly conducted at Umbraco HQ, with summaries and main decision points forwarded to the board
3	Employees	There is a strong feeling of commitment from employees, that the security of the systems and services is a priority. Employees take pride in working at Umbraco, and delivering professional products	The ISMS should be visible and demonstrate a strong commitment to information security, through clear and effective policies, procedures and communication



2. External parties

ID	Interested Party	Requirements	Impact on ISMS
1	Partner organizations	Partner organisations are reliant on the integrity, usability and reputation of Umbraco. Furthermore, partner organisations operate between Umbraco and end-users, and might not be focussed on managing information security in supply-chains	The ISMS needs to be able to manage contractual agreements with partners and be able to demonstrate compliance with these agreements. Furthermore, it will be beneficial to have a good overview of documentation to support partners in showing compliance
2	Community	The community is very active in contributing to the CMS, and there is pride in contributing. The community needs to see that security is taken seriously, to instil a good security culture in the community. Also the open source nature means that there can be varying levels of competence in contributions	The ISMS must be able to manage the information security aspects of utilizing open-source code and validating external inputs to the CMS. It is also necessary to be able to manage potential different security postures within the services
3	End-users	End users can have a number of compliance-requirements that require security documentation. While this is most often an issue between the end user and the partner organization, documentation requirements are often passed on to Umbraco	The ISMS needs to be able to manage the level of compliance needed per agreements with partners, and what type of compliance end-users might require when using commercial add-ons etc. It also needs strong documentation procedures in order to enable smooth audits when necessary



Appendix C – Interfaces and dependencies

The interfaces and dependencies between activities performed by Umbraco A/S and other organizations are listed below and are considered while determining the scope of ISMS. The organizations listed below are critical to Umbraco A/S' operations. However, since the company does not have direct control over these organizations, inherent risks are reduced via signed contractual agreements which comply with Umbraco standards.

Organization	Description of interfaces and dependencies	Remarks
Microsoft	Microsoft delivers the Azure infrastructure on which Umbraco Cloud and Heartcore operate. Furthermore, Umbraco strives to maintain full compatibility with the latest versions of the MS technology Stack	
Cloudflare	Cloudflare serves as the primary DNS & Edge computing provider. Cloudflare is used to securely route (WAF & TLS) internet traffic from end clients to Umbraco HQ & Umbraco Cloud web properties	
Partners and end-users	Umbraco A/S primarily delivers as PaaS, and the main responsibilities for the use of the platform lies with partner organizations and/or end user organizations	Umbraco A/S has service offerings to Partners and end-users, but this is not considered as a key interface or dependency with regards to the in-scope services, and these are considered out-of-scope

Appendix D – Assets

The following, is a list of the supporting assets that are required to be part of the ISMS in order to support the primary business processes and assets.

Asset category	Name	Description	Location(s)	Primary asset(s)
Software/Platform	Azure DevOps	Azure DevOps is the main software development and operations platform used in the operation of most services and applications	Datacenter location is based in Europe	Development and operations processes

Software/Platform	GitHub	GitHub is the main platform and code repository for managing the Source code for Umbraco CMS	Datacenter location is based in United States	Development and operations processes Umbro CMS - Source
Facility	HQ-Odense	The main base of operations for Umbraco	Odense - Buchwaldsgade 35 2nd floor	Development and operations processes Economic resource planning and management