

Control Domain	Control ID	Question ID	Control Specification	Consensus Assessment Questions	Consensus Assessment Answers			Notes
					Yes	No	N/A	
Applications & Interfaces Security Application Security	AIS-01	AIS-01.1	Applications and programming interfaces (APIs) shall be designed, developed, deployed, and tested in accordance with leading industry standards (e.g., OWASP for web applications) and address in applicable legal, regulatory, or regulatory compliance obligations.	Do you use industry standards (i.e., OWASP Software Assurance Maturity Model, ISO 27034) to build in security for your Systems/Software Development Lifecycle (SDLC)?	x			The AWS system development lifecycle incorporates industry best practices which include formal design reviews by the AWS Security Team, threat modeling and completion of a risk assessment. Defectus has built the application using tool based on OWASP model guided by own security team.
		AIS-01.2		Do you use an automated source code analysis tool to detect security defects in code prior to production?		x		Automated code analysis tools are run as a part of the AWS Software Development Lifecycle, and all deployed software undergoes recurring penetration testing performed by carefully selected industry experts. Our security risk assessment reviews begin during the design phase and the engagement lasts through launch to ongoing operations. Refer to the AWS Overview of Security Processes for further details. That whitepaper is located here: https://d1.awsstatic.com/whitepapers/Security/AWS_Security_Whitepaper.pdf
		AIS-01.3		Do you use manual source code analysis to detect security defects in code prior to production?			x	Defectus has used tools for continuous inspection of code quality to perform automatic review with static analysis of code to detect bugs, code smells, and security vulnerabilities.
		AIS-01.4		Do you verify that all of your software suppliers adhere to industry standards for Systems/Software Development Lifecycle (SDLC) security?		x		Manual source-code analysis is not employed. Automated code analysis tools are run as a part of the AWS Software Development Lifecycle
		AIS-01.5		Do you verify that all of your software suppliers adhere to industry standards for Systems/Software Development Lifecycle (SDLC) security?		x		AWS implements open source software or custom code within its services. All open source software to include binary or machine-executable code from third parties is reviewed and approved by the Open Source Group prior to implementation, and has source code that is publicly accessible. AWS service teams are prohibited from implementing code from third parties unless it has been approved through the open source review. All code developed by AWS is available for review by the applicable service team, as well as AWS Security. By its nature, open source code is available for review by the Open Source Group prior to authoring authorization for use within Amazon. Defectus has used open source software or custom code within its services. Before going the adoption, there is a team that validate the implemented code.
		AIS-01.5		Do you verify that all of your software suppliers adhere to industry standards for Systems/Software Development Lifecycle (SDLC) security?		x		Static code analysis tools are run as a part of the standard build process, and all deployed software undergoes recurring penetration testing performed by carefully selected industry experts. Our security risk assessment reviews begin during the design phase and the engagement lasts through launch to ongoing operations. Refer to the AWS Overview of Security Processes for further details. That whitepaper is located here: https://d1.awsstatic.com/whitepapers/Security/AWS_Security_Whitepaper.pdf Defectus performs vulnerability scanning (SAST and DAST) of SaaS application as a part of Defectus Software Development Life Cycle (SDLC).
Applications & Interfaces Security Customer Access Requirements	AIS-02	AIS-02.1	Prior to granting customers access to data, assets, and information systems, identified security, contractual, and regulatory requirements for customer access shall be addressed.	Are all identified security, contractual, and regulatory requirements for customer access contractually addressed and remediated prior to granting customers access to data, assets, and information systems?	x			AWS and Defectus agree to a service agreement outlining the terms of service and responsibilities of both parties prior to service delivery. The requirements of Defectus SaaS application will be the same of master account
		AIS-02.2		Are all requirements and trust levels for customer access defined and documented?		x		AWS and Defectus agree to a service agreement outlining the terms of service and responsibilities of both parties prior to service delivery. The requirements of Defectus SaaS application will be the same of master account
Application & Interface Security Data Integrity	AIS-03	AIS-03.1	Data input and output integrity routines (i.e., reconciliation and edit checks) shall be implemented for application interfaces and databases to prevent manual or systematic processing errors, corruption of data, or misuse.	Does your data management policies and procedures require audits to verify data input and output integrity routines?	x			AWS data integrity controls as described in AWS SOC reports for S3, illustrates the data integrity controls maintained through all phases including transmission, storage and processing. Defectus implements input and output integrity routines in the application and databases layer utilized within AWS environment.
		AIS-03.2		Are data input and output integrity routines (i.e., MD5/DSHA checksums) implemented for application interfaces and databases to prevent manual or systematic processing errors or corruption of data?		x		AWS data integrity controls as described in AWS SOC reports for S3, illustrates the data integrity controls maintained through all phases including transmission, storage and processing. Defectus implements input and output integrity routines in the application and databases layer utilized within AWS environment.
Applications & Interfaces Security Data Security / Integrity	AIS-04	AIS-04.1	Policies and procedures shall be established and maintained in support of data security to include (confidentiality, integrity, and availability) across multiple system interfaces, jurisdictions, and business functions to prevent improper disclosure, alteration, or destruction.	Is your Data Security Architecture designed using an industry standard (e.g., CDSA, NIST/SAFE, CSA Trusted Cloud Architectural Standard, FedRAMP, CACSRM)?	x			The scope is in charge to the CSP AWS
		AIS-04.2		Do you develop and maintain an agreed upon audit plan (i.e., scope, triggers, frequency, resources etc.) for reviewing the efficiency and effectiveness of implemented security controls?	x			The scope is in charge to the CSP AWS
		AIS-04.3		Do you have measures that ensure the confidentiality of each system you depend on?	x			The scope is in charge to the CSP AWS
Audit Assurance & Compliance Independent Audit	AIC-02	AIC-02.1	Audit plans shall be developed and maintained to address business process disruptions. Auditing plans shall focus on reviewing the independent reviews and assessments that be performed at least annually to ensure that the organization addresses conformance of established policies, standards, procedures, and compliance obligations.	Do you allow tenants to view your SOC 2/ISO 27001 or similar third party audit or certification reports?	x			The scope is in charge to the CSP AWS
		AIC-02.2		Do you conduct external penetration tests of your cloud infrastructure regularly as prescribed by industry best practices and applicable laws?	x			The scope is in charge to the CSP AWS
		AIC-02.3		Do you conduct application penetration tests of your cloud infrastructure regularly as prescribed by industry best practices and applicable laws?	x			The scope is in charge to the CSP AWS
		AIC-02.4		Do you conduct internal audits at least annually?	x			The scope is in charge to the CSP AWS
		AIC-02.5		Are the results of internal and external audits available to tenants at their request?	x			The scope is in charge to the CSP AWS
Audit Assurance & Compliance Information System Regulatory Mapping	AIC-03	AIC-03.1	Organizations shall create and maintain a control framework which captures standards, regulations, legal, and industry requirements relevant for their business needs. The control framework shall be reviewed at least annually to ensure changes that could affect the business processes are reflected.	Do you have a program in place that includes the ability to monitor changes to the regulatory requirements in relevant jurisdictions, adjust your security program for changes to legal requirements, and ensure compliance with relevant regulatory requirements?	x			The scope is in charge to the CSP AWS
		AIC-03.2		Do you have measures that ensure the confidentiality of each system you depend on?	x			The scope is in charge to the CSP AWS
		AIC-03.3		Do you have measures that ensure the confidentiality of each system you depend on?	x			The scope is in charge to the CSP AWS
Business Continuity Resiliency	BCR-01	BCR-01.1	A consistent unified framework for business continuity planning and plan development shall be established, documented, and adopted to ensure business resilience.	Does your organization have a plan or framework for business continuity management or disaster recovery management?	x			The scope is in charge to the CSP AWS
		BCR-01.2		Do you have measures that ensure the confidentiality of each system you depend on?	x			The scope is in charge to the CSP AWS

Operational Resilience Business Continuity Planning		BCR-01.1	ensure all business continuity plans are consistent in addressing priorities for testing, maintenance, and information security requirements. Requirements for business continuity plans include the following: <ul style="list-style-type: none">• Defined purpose and scope, aligned with relevant dependencies• Accessible to and understood by those who will use them• Owned by a named person(s) who is responsible for their review, update, and approval• Defined lines of communication, roles, and responsibilities• Detailed recovery procedures, manual work-around, and reference information• Method for plan invocation	Do you provide a disaster recovery capability?	x		Detailed deploy Stack on AWS's placing machines and storing data within multiple geographic regions as well as across multiple Availability Zones within each region. Each Availability Zone is designed as an independent failure zone. In case of failure, automated AWS processes move data traffic away from the affected zone.
		aws-ai-2 aws-ai-3 BCR-01.6		Do you control service continuity with upstream providers in the event of provider failure? Do you provide access to operational redundancy reports, including the services you rely on?	x	x	The scope is in charge to the CSP AWS.
		BCR-01.5		Do you provide a tenant-organized failover option?	x		Detailed Stack use publicly available mechanisms provided by AWS to report security and/or privacy events, including disasters.
		aws-ai-1		Do you share your business continuity and redundancy plans with your tenants?		x	
Business Continuity Management & Operational Resilience Business Continuity Testing	BCR-02	BCR-02.1	Business continuity and security incident response plans shall be subject to testing at planned intervals or upon significant organizational or environmental changes. Incident response plans shall include impacted customers (tenants) and other business relationships that represent critical intra-supply chain business process dependencies.	Are business continuity plans subject to testing at planned intervals or upon significant organizational or environmental changes to ensure continuing effectiveness?	x		The scope is in charge to the CSP AWS
Business Continuity Management & Operational Resilience Business Continuity Documentation	BCR-03	BCR-03.1	Data center utilities services and environmental conditions (e.g., water, power, temperature and humidity controls, telecommunications, and internet connectivity) shall be secured, monitored, maintained, and	Does your organization adhere to any international or industry standards when it comes to security, monitoring, maintaining and testing of datacenter utility services and environmental conditions?	x		The scope is in charge to the CSP AWS
		BCR-03.2	severest connectivity) shall be secured, monitored, maintained, and	Has your organization implemented environmental controls, fail-over mechanisms or other redundancies to secure utility services and maintain environmental conditions?	x		The scope is in charge to the CSP AWS
	BCR-04	BCR-04.1	Information system documentation (e.g., administrator and user guides, and architecture diagrams) shall be made available to authorized personnel to ensure the following: <ul style="list-style-type: none">• Configuring, installing, and operating the information system• Effectively using the system's security features	Are information system documents (e.g., administrator and user guides, architecture diagrams, etc.) made available to authorized personnel to ensure configuration, installation and operation of the information system?	x		The scope is in charge to the CSP AWS
Business Continuity Management & Operational Resilience Environmental Risk	BCR-05	BCR-05.1	Physical protection against damage from natural (causes and disasters, as well as deliberate attacks, including fire, flood, electromagnetic electrical discharge, solar induced geomagnetic storm, wind, earthquake, tsunami, explosion, nuclear accident, volcanic activity, biological hazard, civil unrest, mobile, malicious activity, and other forms of natural or man-made disaster shall be anticipated, designed, and have countermeasures applied.	Is physical damage anticipated and are countermeasures included in the design of physical protection?	x		The scope is in charge to the CSP AWS
Business Continuity Management & Operational Resilience Equipment Location	BCR-06	BCR-06.1	To reduce the risks from environmental threats, hazards, and opportunities for uncontrolled assets, equipment shall be kept away from locations subject to high probability environmental risks and supplemented by redundant equipment located at a reasonable distance.	Are any of your data centers located in places that have a high probability/recurrence of high-impact environmental risks (floods, tsunamis, earthquakes, hurricanes, etc.)?		x	
Business Continuity Management & Operational Resilience Equipment Power Failures	BCR-07	BCR-07.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, for equipment	Do you have documented policies, procedures and supporting business processes for equipment and datacenter maintenance?	x		The scope is in charge to the CSP AWS
		BCR-07.2	Protection measures shall be put into place to react to natural and man-made threats based upon a geographically-specific business impact assessment.	Do you have an assessed and deliberate maintenance schedule in place?	x		The scope is in charge to the CSP AWS
	BCR-08	BCR-08.1		Are security mechanisms and redundancies implemented to protect equipment from utility service outages (e.g., power failures, network disruptions, etc.)?	x		
Business Continuity Management &	BCR-09	BCR-09.1	There shall be a defined and documented method for determining the impact of any disruption to the organization (local provider, cloud	Do you use industry standards and frameworks to determine the impact of any disruption to your organization (i.e. criticality of services and business-criticality, disaster-recovery, RTO and RPO, etc.)?	x		The scope is in charge to the CSP AWS
		BCR-09.1		Does your organization conduct impact analysis reflective to possible disruptions to the cloud service?	x		The scope is in charge to the CSP AWS

[illegible]

Data Security & Information Lifecycle Management Reproduction Date	DSI-03	DSI-03.1	Production data shall not be replicated or used in non-production environments. Any use of customer data in non-production environments requires explicit, documented approval from all customers whose data is affected, and must comply with all legal and regulatory requirements for handling of sensitive data elements.	Do you have procedures in place to ensure production data shall not be replicated or used in non-production environments?	x		The scope is in charge to the CSP AWS
Data Security & Information Lifecycle Management Ownership / Stewardship	DSI-06	DSI-06.1	All data shall be designated with stewardship, with assigned responsibilities defined, documented, and communicated.	Are the responsibilities regarding data stewardship defined, assigned, documented, and communicated?	x		Deloitte has a own procedure to identify and assign the data stewardship to specific owner.
Data Security & Information Lifecycle Management Datacenter Security Group Management	DSI-07	DSI-07.1	Policies and procedures shall be established with supporting business processes and technical measures implemented for the secure disposal of sensitive information and data. Assets must be classified in terms of business criticality, service-level expectations, and operational continuity requirements. A complete inventory of all of your critical assets located at all sites or geographical locations and their assigned ownership?	Do you restrict the secure deletion (e.g., declassification/retention) of archived and backed-up data?	x		The scope is in charge to the CSP AWS
Datacenter Security Group Management	DSI-01	DSI-01.1	Assets must be classified in terms of business criticality, service-level expectations, and operational continuity requirements. A complete inventory of all of your critical assets located at all sites or geographical locations and their assigned ownership?	Can you provide a published procedure for exiting the service arrangement, including assurance to sanitize all computing assets?	x		The scope is in charge to the CSP AWS
Datacenter Security Controlled Access Points	DSI-02	DSI-02.1	Physical security perimeters (e.g., fences, walls, barriers, gates, geos, electronic surveillance, physical authentication mechanisms, reception desks, and security patrols) shall be implemented to safeguard sensitive data and information systems.	Do you classify your assets in terms of business criticality, service-level expectations, and operational continuity requirements?	x		The scope is in charge to the CSP AWS
			Are physical security perimeters (e.g., fences, walls, barriers, gates, geos, electronic surveillance, physical authentication mechanisms, reception desks, and security patrols) implemented for all areas housing sensitive data and information systems?	Do you maintain a complete inventory of all of your critical assets located at all sites or geographical locations and their assigned ownership?	x		The scope is in charge to the CSP AWS
Datacenter Security Equipment Identification	DSI-03	DSI-03.1	Automated equipment identification shall be used as a method of connection authentication. Location-aware technologies may be used to validate connection authentication integrity based on known equipment location.	Do you have a capability to use system geographic location as an authentication factor?	x		Deloitte should provide conditional user access based on IP address using IPSEC connection or AWS Security Group functionality.
Datacenter Security Office Authentication	DSI-04	DSI-04.1	Authorization must be obtained prior to relocation or transfer of hardware, software, or data to an offsite premises.	Is automated equipment identification used as a method to validate connection authentication integrity based on known equipment location?	x		The scope is in charge to the CSP AWS
			Is authorization obtained prior to relocation or transfer of hardware, software, or data to an offsite premises?		x		
Datacenter Security Office Equipment	DSI-05	DSI-05.1	Policies and procedures shall be established for the secure disposal of equipment (by asset type) used outside the organization's premises. This shall include a wiping solution or destruction process that renders recovery of information impossible. The process shall consist of a full series of file drives to ensure that the stored data is released to inventory for reuse and deployment or securely stored until it can be destroyed.	Can you provide tenants with your asset management policies and procedures?	x		The scope is in charge to the CSP AWS
Datacenter Security Policy	DSI-06	DSI-06.1	Policies and procedures shall be established, and supporting business processes implemented, for maintaining a safe and secure working environment in offices, rooms, facilities, and secure areas during regular, scheduled, and unscheduled events.	Can you provide evidence that policies, standards, and procedures have been established for maintaining a safe and secure working environment in offices, rooms, facilities, and secure areas?	x		The scope is in charge to the CSP AWS
Datacenter Security Secure Area Authorization	DSI-07	DSI-07.1	Regimes and regimes to secure areas shall be constructed and monitored by physical access control mechanisms to ensure that only authorized personnel are allowed access.	Can you provide evidence that your personnel and external third parties have been trained regarding your documented policies, standards, and procedures?	x		The scope is in charge to the CSP AWS
			Are physical access control mechanisms (e.g. CCTV cameras, ID cards, checkpoints) in place to secure, constrain and monitor access and ingress points?		x		

Datacenter Security Unauthorized Person Entry	DCS-08	DCS-08.1	Ingress and egress points such as service areas and other points where unauthorized personnel may enter the premises shall be monitored, controlled and, if possible, isolated from data storage and processing facilities to prevent unauthorized data corruption, compromise, and loss.			The scope is in charge to the CSP AWS
			Are ingress and egress points, such as service areas and other points where unauthorized personnel may enter the premises, monitored, controlled and isolated from data storage and process?	x		
Datacenter Security User Access	DCS-09	DCS-09.1	Physical access to information assets and functions by users and support personnel shall be restricted.			The scope is in charge to the CSP AWS
			Do you restrict physical access to information assets and functions by users and support personnel?	x		
Encryption & Key Management Enrollment	DSM-01	DSM-01.1	Keys must have identifiable owners (binding keys to identities) and there shall be key management policies.			The scope is in charge to the CSP AWS
			Do you have key management policies (binding keys to identifiable names)?	x		
Encryption & Key Management Key Generation	DSM-02	DSM-02.1	Policies and procedures shall be established for the management of cryptographic keys in the service's cryptosystem (e.g., lifecycle management from key generation to rotation and replacement, public key infrastructure, cryptographic protocol design and algorithms used, access controls in place for secure key generation, and exchange and storage including segregation of keys used for encrypted data or sessions). Upon request, provider shall inform the customer (owner) of Policies and procedures shall be established, and supporting business processes and technical measures implemented, for the use of encryption protocols for protection of sensitive data in storage (e.g., file servers, databases, and end-user workstations) and data in transit.	Do you have a capability to allow creation of custom encryption keys over network? Do you have a capability to manage encryption keys on behalf of request? Do you maintain key management records? Do you have documented awareness for each stage of the lifecycle of encryption keys?	x x x x	The scope is in charge to the CSP AWS The scope is in charge to the CSP AWS The scope is in charge to the CSP AWS Default uses AWS Key Management Systems (KMS) to create and manage encryption keys lifecycle and document each stage of the lifecycle of encryption keys
			Do you utilize any third-party/cloud/service providers to manage encryption keys?	x		The scope is in charge to the CSP AWS
			Do you encrypt sensitive data at rest (on disk/storage) within your environment?	x		Default uses AWS key rotation mechanism for EC2 and RDS, PaaS tunnel to VPC, AWS to AWS, and AWS to AWS connections.
			Do you manage encryption to protect data and virtual machine images during transport across and between networks and hypervisor resources?	x		Default uses AWS encryption mechanism for EC2 and RDS, PaaS tunnel to VPC, AWS to AWS, and AWS to AWS connections.
Encryption & Key Management Exception	DSM-03	DSM-03.1	Platform and data appropriate encryption (e.g., AES-256) in appropriate formats and standard algorithms that be required. Keys shall not be stored in the cloud (e.g., at the cloud provider in question), but maintained by the cloud consumer or trusted key.	Do you have encryption keys in the cloud? Do you have appropriate key management and key usage duties? Do you have documented information security baseline for every component of your infrastructure (e.g., hypervisors, operating systems, databases, PaaS services, etc.)?	x x x	The scope is in charge to the CSP AWS Default uses AWS Key Management Systems (KMS) to create and manage encryption keys lifecycle and document each stage of the lifecycle of encryption keys
			Do you have the capability to continuously monitor and report the compliance of your infrastructure against your information security baseline?	x		In alignment with ISO 27001 standard, AWS maintains a Risk Management program to mitigate and manage risk. In addition, AWS maintains an AWS ISO 27001 certification. Alignment with ISO 27001 demonstrates to customers that AWS has a system of controls in place that specifically address the primary protection of their content. For more information refer to the AWS Compliance ISO 27001 FAQ http://aws.amazon.com/compliance/iso-27001-faq/ . In addition, Default SaaS could choose a specific AWS region for data evidence, based on specific customer requirements. Default maintains documented policies and procedures with data retention period compliance to GDPR requirements.
Governance and Risk Management Aware	GRM-01	GRM-01.1	Security requirements shall be established for identified or acquired, organizationally-owned or managed, physical or virtual, applications and infrastructure systems, and network components that are documented associated with data protection requirements shall be conducted at planned intervals and shall consider the following: • Assessment of where sensitive data is stored and transmitted across applications, databases, servers, and network infrastructure • Compliance with defined retention periods and end-of-life disposal requirements • Data classification and protection from unauthorized access, loss, destruction, and falsification	Do you conduct risk assessments associated with data protection requirements at least once a year?	x	The scope is in charge to the CSP AWS
			Do you conduct risk assessments associated with data protection requirements at least once a year?	x		The scope is in charge to the CSP AWS
Governance and Risk Management Oversight	GRM-02	GRM-02.1	Managers are responsible for maintaining awareness of, and complying with, security policies, procedures, and standards that are relevant to their area of responsibility.			The scope is in charge to the CSP AWS
			Are your technical, business, and executive managers responsible for maintaining awareness of and compliance with security policies, procedures, and standards for both themselves and their employees as they pertain to the manager and employee's area of responsibility?	x		
Governance and Risk Management Support / Indemnified	GRM-03	GRM-03.1	An Information Security Management Program (ISMP) shall be developed, documented, assessed, and implemented that includes executive and line management that have formal action to support information security through clearly-documented direction and commitment, and shall ensure the action has been assigned.	Do you provide details with documentation, discipline your Information Security Management Program (ISMP)? Do you update your Information Security Management Program (ISMP) at least once a year?	x x	The scope is in charge to the CSP AWS The scope is in charge to the CSP AWS
			Do executive and line management take formal action to support information security through clearly-documented direction and commitment, and ensure the action has been assigned?	x		
Governance and Risk Management Policy	GRM-04	GRM-04.1	Information security policies and procedures shall be established and made readily available for review by all impacted personnel and external business relationships. Information security policies must be authorized by the organization's business leadership (or other accountable business role or function) and supported by a strategic business plan and an information security management program inclusive of defined information security roles and responsibilities for business leadership.	Are your information security policies and procedures made available to all impacted personnel and business partners, authorized by accountable business leadership and supported by the information security management program (or policies) best practices (e.g., ISO 27001, SOC 2)? Are information security policies authorized by the organization's business leadership (or other accountable business role or function) and supported by a strategic business plan and an information security management program inclusive of defined information security roles and responsibilities for business leadership?	x x	The scope is in charge to the CSP AWS The scope is in charge to the CSP AWS
			Do you have awareness to ensure your awareness refers to your information security and access policies?	x		The scope is in charge to the CSP AWS
Governance and Risk Management	GRM-05	GRM-05.1	A formal disclosure or sanction policy shall be established for individuals who have violated security policies and standards.	Can you provide evidence of due diligence regarding your controls, architecture, and processes to regulators and/or standards? Do you disclose which controls, standards, certifications, and/or regulations you comply with? Is a formal disclosure or sanction policy established for individuals who have violated security policies and standards? Do you provide details with documentation, discipline your Information Security Management Program (ISMP)?	x x x x	The scope is in charge to the CSP AWS The scope is in charge to the CSP AWS The scope is in charge to the CSP AWS The scope is in charge to the CSP AWS

Governance and Risk Management Business/Policy Change Impacts	GRM-08	GRM-08.1	Risk assessment results shall include updates to security policies, procedures, standards, and controls to ensure that they remain relevant and effective.				The scope is in charge to the CSF AWS
			Do risk assessment results include updates to security policies, procedures, standards, and controls to ensure they remain relevant and effective?	x			
Governance and Risk Management Governance and Risk Management Assurance	GRM-09	GRM-09.1	The organization's business leadership (or other accountable business unit functions) shall review the information security policy at least annually or at planned intervals.				
	GRM-10	GRM-10.1	Aligned with the enterprise-wide framework, formal risk assessments shall be performed at least annually or at planned intervals, (and in consultation with any change to information systems) to determine the likelihood and impact associated with inherent and residual risk determined independently, considering all risk scenarios.	x			The scope is in charge to the CSF AWS
		GRM-10.2	Do you have a documented, organization-wide program in place to manage risk?	x			The scope is in charge to the CSF AWS
Governance and Risk Management Program	GRM-11	GRM-11.1	Risks shall be mitigated to an acceptable level. Acceptance levels based on criteria shall be established and documented in accordance with reasonable resolution time frames and stakeholder approval.				
		GRM-11.2	Do you make available documentation of your organization-wide risk management program?	x			Detailed doesn't provide the Risk Management program to the customer. This document is categorized as "confidential". Detailed Risk Management program is reviewed by internal auditors during audits for our ISO 27001 compliance.
Human Resources Basic Requirements	HR5-01	HR5-01.1	Upon termination of contract or business relationship, all organizationally owned assets shall be returned to the organization.				
		HR5-01.2	Do you terminate of contract or business relationship, are employees and business partners adequately informed of their obligations for returning assets/returning assets?	x			The scope is in charge to the CSF AWS
		HR5-01.3	Do you have asset return procedures in place to ensure assets are returned within an established period?	x			The scope is in charge to the CSF AWS
Human Resources Background Screening	HR5-02	HR5-02.1	Pursuant to local laws, regulations, ethics, and contractual constraints, all employment candidates, contractors, and third parties shall be subject to background verification proportional to the data classification to be assessed, the business requirements, and acceptable risk.				
			Pursuant to local laws, regulations, ethics, and contractual constraints, are all employment candidates, contractors, and involved third parties subject to background verification?	x			The scope is in charge to the CSF AWS
Human Resources Employment Agreements	HR5-03	HR5-03.1	Employment agreements shall incorporate provisions and/or terms of reference to established information governance and security policies and must be signed by newly hired or on-boarded workforce personnel (e.g., full or part-time employee or contingent staff) prior to granting workforce personnel user access to corporate facilities, resources, and data.				
		HR5-03.2	Do your employment agreements incorporate provisions and/or terms in accordance to established information governance and security policies?	x			The scope is in charge to the CSF AWS
		HR5-03.3	Do you require that employment agreements are signed by newly hired or on-boarded workforce personnel prior to granting workforce personnel user access to corporate facilities, resources, and data?	x			The scope is in charge to the CSF AWS
Human Resources Portable/Mobile Devices	HR5-04	HR5-04.1	Policy and procedures shall be established, and supporting business processes and technical measures implemented, to manage business risks associated with permitting mobile device access to corporate resources and may require the implementation of higher assurance compensating controls and acceptable-use policies and procedures (e.g., mandated security training, stronger identity, authentication and access controls, and device monitoring).				
		HR5-04.2	Are policies and procedures established and measures implemented to strictly limit access to your sensitive data and tenant data from portable and mobile devices (e.g., laptops, cell phones, and personal digital assistants (PDAs)), which are generally higher risk than non-portable devices (e.g., desktop computers at the provider organization's facilities)?	x			The scope is in charge to the CSF AWS
		HR5-04.3	Do the above controls and workflow account for timely separation of access and return of assets?	x			The scope is in charge to the CSF AWS
Human Resources Non-Disclosure Agreements	HR5-05	HR5-05.1	Requirements for non-disclosure or confidentiality agreements reflecting the organization's needs for the protection of data and operational details shall be identified, documented, and reviewed at planned intervals.				
			Are requirements for non-disclosure or confidentiality agreements reflecting the organization's needs for the protection of data and operational details identified, documented, and reviewed at planned intervals?	x			The scope is in charge to the CSF AWS
Human Resources Roles/Responsibilities	HR5-07	HR5-07.1	Roles and responsibilities of contractors, employees, and third-party users shall be documented as they relate to information assets and security.				
			Do you provide tenants with a role definition document clarifying your administrative responsibilities versus those of the tenant?	x			The scope is in charge to the CSF AWS
Human Resources Accessible Use	HR5-08	HR5-08.1	Policy and procedures shall be established, and supporting business processes and technical measures implemented, for defining, assessing and controlling the accessibility of information assets.				
		HR5-08.2	Do you have policies and procedures in place to define awareness and conditions for permitting usage of organizationally-owned or managed user and/or device access and IT infrastructure network and systems components?	x			The scope is in charge to the CSF AWS
		HR5-08.3	Do you define awareness and conditions for PDSI devices and its alternatives in your corporate response?	x			The scope is in charge to the CSF AWS
Human Resources Training/Awareness	HR5-09	HR5-09.1	A security awareness training program shall be established for all contractors, third-party users, and employees of the organization and mandated when appropriate. All individuals with access to organizational data shall receive appropriate awareness training and refreshers in environmental conditions, awareness, and actions.				
		HR5-09.2	Do you provide a formal, on-board, security awareness training program for cloud-related access and data management (such as e.g., multi-tenancy, virtualization, cloud delivery model, segregation of duties implications, and conflicts of interest) for all access, with access to tenant data?	x			The scope is in charge to the CSF AWS
		HR5-09.3	Do you specifically train your employees regarding their specific role and the information security controls they must fulfill?	x			The scope is in charge to the CSF AWS
		HR5-09.4	Do you document employee acknowledgment of training they have completed?	x			The scope is in charge to the CSF AWS

[illegible]

Security & Access Management Utility Programs Access	IAS-11	IAS-12.01	Do you support the ability to force password changes upon first login?	x		Default SaaS define password and account policies for accounts, to meet minimum self-administration requirements for CSF AWS.
		IAS-12.11	Do you have mechanisms in place for disabling accounts that have been locked out (e.g., self-service via email, defined policies, automation, manual audit)?	x		Default SaaS define password and account policies for accounts, to meet minimum self-administration requirements for CSF AWS.
		IAS-12.12	Are access to utility programs used to manage virtualized partitions (e.g. shutdown, clone, etc) appropriately restricted and monitored?	x		The scope is in charge to the CSF AWS.
Infrastructure & Vulnerability Security Asset Registry / Network Services	IAS-01	IAS-01.1	Higher levels of assurance are required for protection, retention, and lifecycle management of audit logs, adhering to applicable legal, statutory, or regulatory compliance obligations and providing unique user access accountability to detect potentially suspicious network behavior and/or file integrity anomalies, and to support forensic investigative capabilities in the event of a security breach.			AWS Security performs regular vulnerability scans on the underlying infrastructure, web applications, and databases in the AWS environment using a variety of tools. External vulnerability assessments are conducted by an AWS approved third party vendor at least quarterly and identified issues are investigated and resolved as resolution. Vulnerabilities that are identified are monitored and evaluated and countermeasures are designed, implemented, and operated to compensate for known and newly identified vulnerabilities. Default SaaS performs vulnerability scans proactively using file integrity monitoring and intrusion detection for Amazon EC2 used in SaaS application. Default SaaS IP addresses and not AWS endpoints. AWS endpoints are tested as part of AWS compliance vulnerability scans.
		IAS-01.2	Are file integrity (FIM) and network intrusion detection (IDS) tools implemented to help facilitate timely detection, investigation by root cause analysis, and response to incidents?	x		
		IAS-01.3	Is detection and logging on access to audit logs supported or automated (e.g. supported)?	x		The scope is in charge to the CSF AWS.
		IAS-01.4	Can you provide evidence that data lineage mapping of regulations and standards to your controls/architecture/processes is in compliance?	x		The scope is in charge to the CSF AWS.
		IAS-01.5	Are audit logs centrally stored and retained?	x		The scope is in charge to the CSF AWS.
		IAS-01.6	Are audit logs stored in a central location for at least 90 days (e.g., with automated backup)?	x		The scope is in charge to the CSF AWS.
Infrastructure & Vulnerability Security Change Governance	IAS-02	IAS-02.1	Do you log and alert any change made to virtual machine images regardless of their running state (e.g., dormant, off or running). The results of a change or reuse of an image and the subsequent validation of the image's integrity must be immediately available to customers through electronic methods (e.g., portals or APIs).	x		Default SaaS log and alert any change made to virtual machine images using AWS CloudTrail feature. Default SaaS take advantage of the Amazon Machine Images (AMI) to provide an image integrity for SaaS. AWS is designed to protect the confidentiality and integrity of transmitted data through the comparison of a cryptographic hash of data transmitted. This is done to help ensure that the message is not corrupted or altered in transit. Data that has been corrupted or altered in transit is immediately reported. Default SaaS use a secure, encrypted session to AWS servers using HTTPS (Transport Layer Security (TLS)). Default SaaS protect data at rest using AWS encryption features.
		IAS-02.2	Do you log and alert any change made to virtual machine images regardless of their running state (e.g., dormant, off or running). The results of a change or reuse of an image and the subsequent validation of the image's integrity must be immediately available to customers through electronic methods (e.g., portals or APIs).	x		The scope is in charge to the CSF AWS.
		IAS-02.3	Are changes made to virtual machines, or missing of an image and subsequent validation of the image's integrity, made immediately available to customers through electronic methods (e.g., portals or APIs)?	x		The scope is in charge to the CSF AWS.
		IAS-02.4	Is a reliable and mutually agreed upon external time source that be used to synchronize the system clocks of all relevant information processing systems to facilitate tracing and reconstruction of activity resolution.	x		The scope is in charge to the CSF AWS.
		IAS-02.5	The availability, quality, and adequate capacity and resources that be planned, prepared, and measured to deliver the required system performance in accordance with legal, statutory, and regulatory compliance obligations. Projections of future capacity requirements must be made to mitigate the risk of system overload.	x		The scope is in charge to the CSF AWS.
		IAS-02.6	Does the log and alert any change made to virtual machine images regardless of their running state (e.g., dormant, off or running). The results of a change or reuse of an image and the subsequent validation of the image's integrity must be immediately available to customers through electronic methods (e.g., portals or APIs).	x		The scope is in charge to the CSF AWS.
Infrastructure & Vulnerability Security Access Management / Vulnerability Management	IAS-03	IAS-03.1	Implementers that ensure that the security vulnerability assessment tools or services accommodate the virtualization technologies used (e.g., virtualization aware).			The scope is in charge to the CSF AWS.
		IAS-03.2	Do security vulnerability assessment tools or services accommodate the virtualization technologies being used (e.g., virtualization aware)?	x		
		IAS-03.3	For your test offering, do you provide customers with guidance on how to create a layered security architecture appropriate to your virtualized solution?	x		Default SaaS doesn't offer test to their customer.
		IAS-03.4	Do you regularly update network architecture diagrams that include data flows between security domains/zones?	x		Several network fabrics exist at Amazon, each separated by devices that control the flow of information between fabrics. The flow of information between fabrics is established by approved authorizations, which exist as access control lists (ACL) which reside on these devices. These devices control the flow of information between fabrics as mandated by AWS. ACLs are defined, approved by appropriate personnel, managed and deployed using AWS-ACL management tool. Default SaaS maintain information related to data flow and individual application architectures of SaaS AWS implementations.
		IAS-03.5	Do you regularly review for appropriate the allowed access/connectivity (e.g., firewall rules) between security domains/zones within the network?	x		Amazon's Information Security team approves these ACLs. Approved firewall rules sets and access control lists between network fabrics restrict the flow of information to specific information system users. Access control lists and rules sets are reviewed and approved, and are automatically pushed to boundary protection devices on a periodic basis (at least weekly 24 hours) to ensure rules sets and access control lists are up-to-date. AWS Network Management is regularly reviewed by independent third party auditors as a part of AWS ongoing compliance with SOC, PCI DSS, and ISO 27003. Default SaaS maintain information related to data and individual architectures of SaaS application and is also responsible for defining the security rules applied by the components followed by AWS.
		IAS-03.6	Are all firewall access control lists documented with business justification?	x		AWS implements least privilege throughout its infrastructure components. AWS prohibits all ports and protocols that do not have a specific business purpose. AWS follows a rigorous approach to restrict information access from these features and functions that are essential to use of the device. Network scanning is performed and any unnecessary ports or protocols to use are closed. Default SaaS maintain information related to data and individual architecture of SaaS application and is also responsible for defining the security rules applied by the components followed by AWS.
Infrastructure & Vulnerability Security OT Networking and Data Controls	IAS-07	IAS-07.1	Each operating system shall be hardened to provide only necessary ports, protocols, and services to meet business needs and have in place supporting technical controls such as, antivirus, file integrity monitoring, and logging as part of their baseline operating build standard or template.			The scope is in charge to the CSF AWS.
		IAS-07.2	Are operating systems hardened to provide only the necessary ports, protocols, and services to meet business needs using technical controls (e.g., antivirus, file integrity monitoring, and logging as part of their baseline build standard or template)?	x		
		IAS-07.3	For your SaaS or PaaS offering, do you provide tenants with separate environments for production and test processes?	x		Default SaaS provides separate environments for production and test processes.
Infrastructure & Vulnerability Security Production / Non-Production	IAS-08	IAS-08.1	Production and non-production environments shall be separated to prevent unauthorized access or changes to information assets. Separation of the environments may include: statistical partitioning, network, domain/name authentication sources, and their segregation of duties for personnel accessing these environments at any of their own time.	x		Default SaaS provides separate environments for production and test processes.

Infrastructure & Virtualization Security Implementation	IS-06	IS-06.1	Multi-tenant organizationally owned or managed physical and virtual applications, and infrastructure system and network components, that are designed, developed, deployed, and configured such that provider and customer (tenant) user access is appropriately segregated from other tenant users, based on the following considerations:	Do you logically and physically separate production and non-production environments?	x		The scope is in charge to the CSP AWS
		IS-06.2	Established policies and procedures	Are system and network environments protected by a firewall or virtual firewall to ensure compliance with legal, regulatory and contractual requirements?	x		The scope is in charge to the CSP AWS
		IS-06.3	Isolation of business critical assets and/or sensitive user data and resources that mandates stronger internal controls and high level of assurance	Do you have the ability to logically segment or encrypt customer data such that data may be produced for a single tenant only, without inadvertently exposing another tenant's data?	x		The scope is in charge to the CSP AWS
		IS-06.4	Compliance with legal, statutory, and regulatory compliance obligations	Are system and network environments protected by a firewall or virtual firewall to ensure protection and isolation of sensitive data?	x		Details use AWS (Organization, VPC, subnet, etc) to segregate tenant and protect tenant's data.
		IS-10	Secure and encrypted communication channels that be used when migrating physical servers, applications, or data to virtualized servers and, where possible, shall use a network segregated from production environments	Are secure and encrypted communication channels used when migrating physical servers, applications, or data to virtualized servers?	x		Details use a secure, encrypted session to AWS servers using Transport Layer Security (TLS).
Infrastructure & Virtualization Security (CSP Security, Hypervisor, Firewall, Networking)	IS-11	IS-11.1	Access to all hypervisor management functions or administrative consoles for systems hosting virtualized systems shall be restricted to personnel based upon the principle of least privilege and supported through technical controls (e.g., two-factor authentication, audit trails, IP address filtering, firewalls, and TLS encapsulated communications to the administrative console).	Do you use a network segregated from production-level networks when migrating physical servers, applications, or data to virtualized servers?	x		Details use AWS (VPC, subnet, etc) to segregate production and non-production environments.
				Do you restrict personnel access to all hypervisor management functions or administrative consoles for systems hosting virtualized systems based on the principle of least privilege and supported through technical controls (e.g., two-factor authentication, audit trails, IP address filtering, firewalls and TLS-encapsulated communications to the administrative console)?	x		The scope is in charge to the CSP AWS
Infrastructure & Virtualization Security Wireless Security	IS-12	IS-12.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to protect wireless network environments, including the following:	Are policies and procedures established and mechanisms configured and implemented to protect the wireless network environment perimeter and to restrict unauthorized wireless traffic?	x		Policies, procedures and mechanisms to protect AWS network environment are in place. There are no wireless networks or radio signals within the system boundary. AWS continuously monitors wireless networks in order to detect rogue or other devices not authorized to authenticate to the system. AWS security controls are reviewed by independent external auditors during audits for our SOC, PCI DSS and ISO 27001 compliance.
		IS-12.2	Security settings enabled with strong encryption for authentication and transmission, replacing vendor default settings (e.g., encryption keys, passwords, and SNMP community strings)	Are policies and procedures established and mechanisms implemented to ensure wireless security settings are enabled with strong encryption for authentication and transmission, replacing vendor default settings (e.g., encryption keys, passwords, SNMP community string)?	x		There are no wireless networks or radio signals within the system boundary. AWS continuously monitors wireless networks in order to detect rogue or other devices not authorized to authenticate to the system.
		IS-12.3	The capability to detect the presence of unauthorized (rogue) wireless network devices for a timely disconnect from the network	Are policies and procedures established and mechanisms implemented to protect wireless network environments and detect the presence of unauthorized (rogue) network devices for a timely disconnect from the network?	x		There are no wireless networks or radio signals within the system boundary. AWS continuously monitors wireless networks in order to detect rogue or other devices not authorized to authenticate to the system.
Infrastructure & Virtualization Security Network Architecture	IS-13	IS-13.1	Network architecture diagrams shall clearly identify high-risk environments and data flows that may have legal compliance impacts. Technical measures shall be implemented and shall apply defense-in-depth techniques (e.g., deep packet analysis, traffic throttling, and black-holing for detection and timely response to network-based attacks associated with anomalous ingress or egress traffic patterns (e.g., MAC spoofing and ARP poisoning attacks) and/or distributed denial-of-service (DDoS) attacks.	Do your network architecture diagrams clearly identify high-risk environments and data flows that may have legal compliance impacts?	x		Details has designed a clearly architecture diagram to identify data flow and using network segmentation to segregate environments. Internally, AWS network segmentation is aligned with the ISO 27001 standard. AWS has been validated and certified by an independent auditor to confirm alignment with ISO 27001 certification standard.
		IS-13.2		Do you implement technical measures and apply defense-in-depth techniques (e.g., deep packet analysis, traffic throttling and black-holing for detection and timely response to network-based attacks associated with anomalous ingress or egress traffic patterns (e.g., MAC spoofing and ARP poisoning attacks) and/or distributed denial-of-service (DDoS) attacks)?	x		The scope is in charge to the CSP AWS
Interoperability & Portability (APIs)	IP-01	IP-01.1	The provider shall use open and published APIs to ensure support for interoperability between components and to facilitate migrating applications.	Do you publish a list of all APIs available in the service and indicate which are standard and which are customized?	x		The scope is in charge to the CSP AWS
Interoperability & Portability Data Request	IP-02	IP-02.1	All structured and unstructured data shall be available to the customer and provided to them upon request in an industry-standard format (e.g., .doc, .xls, .pdf, logs, and flat files).	Is unstructured customer data available on request in an industry standard format (e.g., .doc, .xls, or .pdf)?	x		
Interoperability & Portability Policy & Legal	IP-03	IP-03.1	Policies, procedures, and mutually agreed upon provisions and/or terms shall be established to satisfy customer (tenant) requirements for service-to-service applications (API) and information governing interoperability, and portability for application development and information exchange, usage, and integrity provisions.	Do you provide policies and procedures (i.e. service level agreements) governing the use of APIs for interoperability between components and/or services?	x		Details SaaS provides policies and procedures for the usage of APIs and for service-to-service applications (APIs).
		IP-03.2		If using virtual infrastructure, do you allow virtual machine images to be downloaded and ported to a new cloud provider?	x		Details SaaS can export their APIs and use them on premise or at another cloud provider.
Interoperability & Portability Standardized	IP-04	IP-04.1	The provider shall use secure (e.g., non-clear text and authenticated), standardized network protocols for the ingest and export of data and to manage the service, and shall make available a document to	Do you provide consumers (tenants) with documentation detailing the relevant interoperability and portability network protocols and standards that are followed?	x		Details use a secure, authenticated and encrypted session to AWS servers using Transport Layer Security (TLS).
		IP-04.2		Do you use an industry-respected virtualization platform and standard virtualization formats (e.g., OVF) to help ensure interoperability, and shall have documented custom changes made to any hypervisor in use, and all solution-specific virtualization hooks available for customer reuse?	x		The scope is in charge to the CSP AWS
Interoperability & Portability Virtualization	IP-05	IP-05.1	The provider shall use an industry-respected virtualization platform and standard virtualization formats (e.g., OVF) to help ensure interoperability, and shall have documented custom changes made to any hypervisor in use, and all solution-specific virtualization hooks available for customer reuse.	If using virtual infrastructure, are machine images made available to the customer in a way that would allow the customer to port them to their own off-site compute resources?	x		Details SaaS can export their APIs and use them on premise or at another cloud provider.
		IP-05.2		Do you have documented custom changes made to any hypervisor in use, and all solution-specific virtualization hooks available for customer reuse?	x		The scope is in charge to the CSP AWS

Mobile Security Anti-Malware	MDS-01	MDS-01.1	Anti-malware awareness training, specific to mobile devices, shall be included in the provider's information security awareness training.				<p>AWS scope for mobile devices are iOS and Android based mobile phones and tablets.</p> <p>AWS maintains a formal mobile device policy and associated procedures.</p> <p>Specifically, AWS mobile devices are only allowed access to AWS corporate fabric resources and cannot access AWS production fabric where customer content is stored. AWS production fabric is separated from the corporate fabric by boundary protection devices that control the flow of information between fabrics. Approved firewall rule sets and access control lists between network fabrics restrict the flow of information to specific information system services.</p> <p>Access control lists and rule sets are reviewed and approved, and are automatically pushed to boundary protection devices on a periodic basis (at least every 24 hours) to ensure rule sets and access control lists are up-to-date.</p> <p>Consequently, mobile devices are not relevant to AWS customer content access. Outdata doesn't provides mobile application for this service.</p>
Mobile Security Application Stores	MDS-02	MDS-02.1	A documented list of approved application stores has been communicated as acceptable for mobile devices accessing or storing provider managed data.				<p>See Response to MDS-01.1</p>
Mobile Security Approved Applications	MDS-03	MDS-03.1	The company shall have a documented policy prohibiting the installation of non-approved applications or approved applications not obtained through a pre-identified application store.				<p>See Response to MDS-01.1</p>
Mobile Security Approved Software for BYOD	MDS-04	MDS-04.1	The BYOD policy and supporting awareness training clearly states the approved applications, application stores, and application extensions and plugins that may be used for BYOD usage.				<p>See Response to MDS-01.1</p>
Mobile Security Awareness and Training	MDS-05	MDS-05.1	The provider shall have a documented mobile device policy that includes a documented definition for mobile devices and the acceptable usage and requirements for all mobile devices. The provider shall post and communicate the policy and requirements through the company's security awareness and training program.				<p>See Response to MDS-01.1</p>

Mobile Security Cloud Based Services	MCS-06	MCS-06.1	All cloud-based services used by the company's mobile devices or BYOD shall be pre-approved for usage and the storage of company business data.	Do you have a documented list of pre-approved cloud-based services that are allowed to be used for use and storage of company business data via a mobile device?		x	See Response to MCS-01.1
Mobile Security Compatibility	MCS-07	MCS-07.1	The company shall have a documented application validation process to test for mobile device, operating system, and application compatibility issues.	Do you have a documented application validation process for testing device, operating system, and application compatibility issues?		x	See Response to MCS-01.1
Mobile Security Device Eligibility	MCS-08	MCS-08.1	The BYOD policy shall define the device and eligibility requirements to allow for BYOD usage.	Do you have a BYOD policy that defines the device(s) and eligibility requirements allowed for BYOD usage?		x	See Response to MCS-01.1
Mobile Security Device Inventory	MCS-09	MCS-09.1	An inventory of all mobile devices used to store and access company data shall be kept and maintained. All changes to the status of these devices, i.e., operating system and patch levels, lost or decommissioned status, and to whom the device is assigned or approved for usage (BYOD), will be included for each device in the inventory.	Do you maintain an inventory of all mobile devices storing and accessing company data which includes device status (e.g., operating system and patch levels, lost or decommissioned, device assigned)?		x	See Response to MCS-01.1
Mobile Security Device Management	MCS-10	MCS-10.1	A centralized, mobile device management solution shall be deployed to all mobile devices permitted to store, transmit, or process customer data.	Do you have a centralized mobile device management solution deployed to all mobile devices that are permitted to store, transmit, or process company data?		x	See Response to MCS-01.1

Mobile Security Encryption	MDS-11	MDS-11.1	The mobile device policy shall require the use of encryption either for the entire device or for data identified as sensitive on all mobile devices and shall be enforced through technology controls.			See Response to MDS-GL-1
			Does your mobile device policy require the use of encryption for either the entire device or for data identified as sensitive enforceable through technology controls for all mobile devices?	x		
Mobile Security Introducing and Enforcing	MDS-12	MDS-12.1	The mobile device policy shall prohibit the circumvention of built-in security controls on mobile devices (e.g., jailbreaking or rooting) and enforced through detective and preventative controls on the device or a centralized device management system which prohibit the circumvention of built-in security controls?	x	See Response to MDS-GL-1	
Mobile Security Usage	MDS-13	MDS-13.1	The BYOD policy includes clarifying language for the expectation of privacy, requirements for litigation, e-discovery, and legal holds.	x	See Response to MDS-GL-1	
Mobile Security Lockout Screen	MDS-14	MDS-14.1	BYOD and/or corporate owned devices are configured to require an automatic lockout screen, and the requirements shall be enforced through technical controls.	x	See Response to MDS-GL-1	
			Do you require and enforce via technical controls an automatic lockout screen for BYOD and company owned devices?	x		
Mobile Security Operating Systems	MDS-15	MDS-15.1	Changes to mobile device operating systems, patch levels, and/or applications shall be managed through the company's change management processes.			See Response to MDS-GL-1
			Do you manage all changes to mobile device operating systems, patch levels, and applications via your company's change management processes?	x		
Mobile Security Passwords	MDS-16	MDS-16.1	Password policies, applicable to mobile devices, shall be documented and enforced through technical controls on all company devices or devices associated the BYOD, usage, and shall include the observation of:	x	See Response to MDP-GL-1	
Mobile Security Policy	MDS-17	MDS-17.1	The mobile device policy shall require the BYOD user to perform backups of data, prohibit the usage of unapproved application stores, and restrict the use of anti-malware software before connecting.	x	See Response to MDP-GL-1	
Mobile Security Remote Wipe	MDS-18	MDS-18.1	All mobile devices permitted for use through the company BYOD and/or use of a secure mobile device shall include the remote wipe capability.	x	See Response to MDP-GL-1	
Mobile Security Security Features	MDS-19	MDS-19.1	Mobile devices connecting to corporate networks or storing and accessing company information shall also be remote wiped.	x	See Response to MDP-GL-1	
Mobile Security User	MDS-20	MDS-20.1	The BYOD policy shall clarify the system, and users, allowed for use on devices in the BYOD-enabled device?	x	See Response to MDP-GL-1	
Security Incident Management, C Discovery, & Cloud Forensics Control / Authentic Measurement	SIF-01	SIF-01.1	Part of control for applicable regulatory authorities, national and local law enforcement, and other legal jurisdictional authorities shall be maintained and regularly updated (e.g., change in impacted scope and/or a change in any compliance obligation) to ensure direct compliance failures have been established and to be prepared for a forensic investigation requiring rapid engagement with law enforcement.			The scope is in charge to the CFP AWS
			Do you maintain liaisons and points of contact with local authorities in accordance with contracts and appropriate regulations?	x		
Security Incident Management, C Discovery, & Cloud Forensics	SIF-02	SIF-02.1	Polices and procedures shall be established, and supporting business processes and technical measures implemented, to trigger security-related events and ensure timely and effective incident management as established IT service management policies and procedures.	x	The scope is in charge to the CFP AWS	
Security Incident Management, C Discovery, & Cloud Forensics	SIF-03	SIF-03.1	Workforce personnel and external business relationships shall be informed of their responsibility and, if required, shall consent and contractually agree to report all information security events in a timely manner.	x	The scope is in charge to the CFP AWS	
Security Incident Management, C Discovery, & Cloud Forensics Incident Response Legal Preparation	SIF-04	SIF-04.1	Proper forensic procedures, including chain of custody, are required for the preservation of evidence to support potential legal action subject to the relevant jurisdiction after an information security incident.	x	The scope is in charge to the CFP AWS	
			Upon notification, customers and/or other external business partners impacted by a security breach shall be given the opportunity to participate as is legally permissible in the forensic investigation.			
Security Incident Management, C Discovery, & Cloud Forensics Incident Response Recovery	SIF-05	SIF-05.1	Mechanisms shall be put in place to monitor and quantify the types, volumes, and costs of information security incidents.	x	The scope is in charge to the CFP AWS	
			Will you share statistical information for security incident data with your tenants upon request?	x		The scope is in charge to the CFP AWS. Besides tracks, metrics for internal process measurements and improvements, but this level of detail is not shared with the customer and categorized as "confidential". Any data breaches will be communicated to the data controller according to the GDPR policies.

Supply Chain Management, Transparency, and Accountability Data Quality and Integrity	SFA-01	SFA-01.1	Providers shall inspect, account for, and work with their cloud supply chain partners to correct data quality errors and associated risks. Providers shall design and implement controls to mitigate and contain data security risks through proper separation of duties, role-based access, and least privilege access for all personnel within their supply chain.	Do you inspect and account for data quality errors and associated risks, and work with your cloud supply-chain partners to correct them?	x		Deloitte SaaS inspect all accounts and analyze the associated risks. Each third parties contractor must be confirmed and identified as a data controller.
		SFA-01.2	The provider shall make security incident information available to all affected customers and providers periodically through electronic methods (e.g., portal).	Do you design and implement controls to mitigate and contain data security risks through proper separation of duties, role-based access, and least-privilege access for all personnel within your supply chain?	x		The scope is in charge to the CSP AWS
	SFA-02	SFA-02.1		Do you make security incident information available to all affected customers and providers periodically through electronic methods (e.g., portal)?	x		
		SFA-02.2					
Supply Chain Management, Transparency, and Accountability Provider Internal Assessments	SFA-03	SFA-03.1	Business-critical or customer (tenant) impacting (physical and virtual) application and system-system interface (API) designs and components, and cloud architecture network and system components, shall be designed, developed, and deployed in accordance with the provider's security requirements, and deployed in accordance with the provider's security requirements.	Do you collect capacity and use data for all relevant components of your cloud service offering?	x		The scope is in charge to the CSP AWS
		SFA-03.2		Do you provide tenants with capacity planning and use reports?	x		Deloitte for SaaS offering provide capacity planning for infrastructure strong and use AWS report to monitor the consumption of resource.
	SFA-04	SFA-04.1	The provider shall perform annual internal assessments of conformance and effectiveness of its policies, procedures, and supporting measures and metrics.	Do you perform annual internal assessments of conformance and effectiveness of your policies, procedures, and supporting measures and metrics?	x		The scope is in charge to the CSP AWS
		SFA-04.2					
Supply Chain Management, Transparency, and Accountability Third Party Agreements	SFA-05	SFA-05.1	Supply chain agreements (e.g., SaaS) between providers and customers (tenants) shall incorporate at least the following mutually agreed upon provisions and/or terms:	Do you select and monitor outsourced providers in compliance with laws in the country where the data is processed, stored, and transmitted?	x		The scope is in charge to the CSP AWS
		SFA-05.2	• Scope of business relationship and services offered (e.g., customer (tenant) data acquisition, exchange and usage, feature sets and functionality, personnel and infrastructure network and systems components for service delivery and support, roles and responsibilities of provider and customer (tenant) and any subcontracted or outsourced business relationships, physical/geographical location of business services, and any known regulatory compliance considerations)	Do you select and monitor outsourced providers to ensure that they are in compliance with applicable legislation?	x		The scope is in charge to the CSP AWS
		SFA-05.3	• Information security requirements, provider and customer (tenant) primary points of contact for the duration of the business relationship, and reference to detailed supporting relevant business processes and technical measures implemented to enable effectively governance risk management, assurance and regulatory and regulatory compliance obligations by all impacted business relationships	Do third-party agreements include provisions for the security and protection of information and assets?	x		The scope is in charge to the CSP AWS
		SFA-05.4	• Notification and/or pre-authorization of any change controlled by the provider with customer (tenant) requests.	Do you have the capability to recover data for a specific customer in the case of a failure or data loss?	x		Deloitte in the backup policies take the advantage of Amazon S3 and Glacier services that are designed to reduce the likelihood of data loss and provide durability equivalent of multi-site copies of data objects is achieved through data storage redundancy. For information on data durability and redundancy, please refer to the AWS website.
	SFA-06	SFA-06.1	• Timely notification of a security incident (or confirmed breach) to the customer (tenant) and other business relationships impacted (e.g., up-stream/down-stream). Review shall be performed at least annually and identify non-conformance to established agreements. The review should result in actions to address service-level conflicts or inconsistencies resulting from disparate supplier relationships.	Do you have the capability to restrict the storage of customer data to specific countries or geographic locations?	x		Deloitte SaaS could choose a specific AWS region to store data based on specific customer locations.
		SFA-06.2	• Assessment and independent verification of compliance with agreement provisions and/or terms (e.g., industry acceptable certification, attestation audit report, or equivalent forms of assurance) without posing an unacceptable business risk of exposure to the organization being assessed.	Can you provide the physical location(s)/geography of storage of a tenant's data upon request?	x		Deloitte SaaS could choose a specific AWS region to store data based on specific customer locations.
		SFA-06.3	• Timely notification of a security incident (or confirmed breach) to the customer (tenant) and other business relationships impacted (e.g., up-stream/down-stream). Review shall be performed at least annually and identify non-conformance to established agreements. The review should result in actions to address service-level conflicts or inconsistencies resulting from disparate supplier relationships.	Can you provide the physical location(s)/geography of storage of a tenant's data in advance?	x		Deloitte SaaS could choose a specific AWS region to store data based on specific customer locations.
		SFA-06.4	• Assessment and independent verification of compliance with agreement provisions and/or terms (e.g., industry acceptable certification, attestation audit report, or equivalent forms of assurance) without posing an unacceptable business risk of exposure to the organization being assessed.	Do you allow tenants to opt out of having their data/information assessed via intrusion technologies?	x		Deloitte SaaS monitor environments through AWS services (CloudWatch, etc) and application specific logs to detect privacy breaches. Deloitte SaaS follows the European laws regarding privacy according to the timing requirements (GDPR). For specific project the timing should be reduced in according to each tenants.
	SFA-07	SFA-07.1	Procedures shall review the risk management and governance processes of their partners in that practices are consistent and aligned to account for risks inherited from other members of that partner's cloud supply chain.	Do you allow tenants to opt out of having their data/information assessed via intrusion technologies?	x		Deloitte SaaS monitor environments through AWS services (CloudWatch, etc) and application specific logs to detect privacy breaches. Deloitte SaaS follows the European laws regarding privacy according to the timing requirements (GDPR). For specific project the timing should be reduced in according to each tenants.
		SFA-07.2		Do you archive the client with a list and copies of all subcontractor agreements and keep this updated?	x		The scope is in charge to the CSP AWS
		SFA-07.3					
		SFA-07.4					
Supply Chain Management, Transparency, and Accountability Supply Chain Metrics	SFA-08	SFA-08.1	Policies and procedures shall be implemented to ensure the consistent review of service agreements (e.g., SaaS) between providers and customers (tenants) across the relevant supply chain.	Do you review the risk management and governance processes of partners to account for risks inherited from other members of that partner's supply chain?	x		
		SFA-08.2	Upstream/downstream. Review shall be performed at least annually and identify non-conformance to established agreements. The review should result in actions to address service-level conflicts or inconsistencies resulting from disparate supplier relationships.	Are policies and procedures established, and supporting business processes and technical measures implemented, for maintaining consistent, accurate, and relevant assessments (e.g., SaaS) between providers and customers (tenants)?	x		The scope is in charge to the CSP AWS
		SFA-08.3	Upstream/downstream. Review shall be performed at least annually and identify non-conformance to established agreements. The review should result in actions to address service-level conflicts or inconsistencies resulting from disparate supplier relationships.	Do you have the ability to measure and address non-conformance of providers and/or terms across the entire supply chain (upstream/downstream)?	x		AWS proactively informs our customers of any subcontractors who have access to customer-owned content that you upload onto AWS, including content that may contain personal data. There are no subcontractors authorized by AWS to access any customer-owned content that you upload onto AWS. To monitor subcontractor access year-round please refer to: https://aws.amazon.com/Compliance/third-party-access/
		SFA-08.4	Upstream/downstream. Review shall be performed at least annually and identify non-conformance to established agreements. The review should result in actions to address service-level conflicts or inconsistencies resulting from disparate supplier relationships.	Can you manage service-level conflicts or inconsistencies resulting from disparate supplier relationships?	x		Deloitte monitors the performance for each subcontractors where each of them need to be confirmed and identified as a data controller.
	SFA-09	SFA-09.1		Do you archive tenants with sensitive visibility and selective of your operational Service Level Agreements (SLA) performance?	x		AWS proactively informs our customers of any subcontractors who have access to customer-owned content that you upload onto AWS, including content that may contain personal data. There are no subcontractors authorized by AWS to access any customer-owned content that you upload onto AWS. To monitor subcontractor access year-round please refer to: https://aws.amazon.com/Compliance/third-party-access/
		SFA-09.2		Do you archive tenants with sensitive visibility and selective of your SLA performance?	x		The scope is in charge to the CSP AWS
		SFA-09.3		Do you archive tenants with sensitive visibility and selective of your SLA performance?	x		The scope is in charge to the CSP AWS
		SFA-09.4		Do you archive tenants with sensitive visibility and selective of your SLA performance?	x		The scope is in charge to the CSP AWS
	SFA-10	SFA-10.1		Do you archive tenants with sensitive visibility and selective of your SLA performance?	x		Deloitte monitors the performance for each subcontractors where each of them need to be confirmed and identified as a data controller.
		SFA-10.2		Do you archive tenants with sensitive visibility and selective of your SLA performance?	x		The scope is in charge to the CSP AWS
		SFA-10.3		Do you archive tenants with sensitive visibility and selective of your SLA performance?	x		The scope is in charge to the CSP AWS
		SFA-10.4		Do you archive tenants with sensitive visibility and selective of your SLA performance?	x		The scope is in charge to the CSP AWS

Supply Chain Management, Transparency, and Accountability (Third-Party Assessment)	SFA-08	SFA-08.1	Providers shall ensure reasonable information security across their information supply chain by performing an annual review. The review shall include all partners/third party providers upon which their information supply chain depends on.	Do you ensure reasonable information security across your information supply chain by performing an annual review?			AWS proactively informs our customers of any subcontractors who have access to customer-owned content you upload onto AWS, including content that may contain personal data. There are no subcontractors authorized by AWS to access any customer-owned content that you upload onto AWS. To monitor subcontractor access year-round, please refer to: https://aws.amazon.com/compliance/third-party-access/ . Dedatus monitors the performance for each subcontractors where each of them need to be performed and identified as a data controller.
		SFA-08.2		Does your annual review include all partners/third party providers upon which your information supply chain depends?			AWS proactively informs our customers of any subcontractors who have access to customer-owned content you upload onto AWS, including content that may contain personal data. There are no subcontractors authorized by AWS to access any customer-owned content that you upload onto AWS. To monitor subcontractor access year-round, please refer to: https://aws.amazon.com/compliance/third-party-access/ . Dedatus monitors the performance for each subcontractors where each of them need to be performed and identified as a data controller.
Supply Chain Management, Transparency, and Threat and Vulnerability Management (Third-Party Assessment)	SFA-09	SFA-09.1	Third-party service providers shall demonstrate compliance with information security and confidentiality, access control, service definitions, and delivery level agreements included in third-party	Do you mandate annual information security reviews and audits of your third party providers to ensure that all agreed upon security requirements are met?			The scope is in charge to the CSP AWS
		SFA-09.2		Do you have external third party services conduct vulnerability scans and periodic penetration tests on your applications and services?			The scope is in charge to the CSP AWS
		TVM-01	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to prevent the execution of malware on organizationally-owned or managed user end-point devices (i.e., issued workstations, laptops, and mobile devices) and	Do you have anti-malware programs that support or connect to your cloud service offerings installed on all of your IT infrastructure network and system components?			The scope is in charge to the CSP AWS
		TVM-01.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to prevent the execution of malware on organizationally-owned or managed user end-point devices (i.e., issued workstations, laptops, and mobile devices) and	Do you ensure that security threat detection systems using signatures, file, or behavioral patterns are updated across all infrastructure components as prescribed by industry best practices?			The scope is in charge to the CSP AWS
		TVM-02	Policies and procedures shall be established, and supporting business processes and technical measures implemented, for timely detection of vulnerabilities within organizationally-owned or managed applications, infrastructure network and system components (e.g., network vulnerability assessment, penetration testing) to ensure the efficacy of implemented security controls. A risk-based model for prioritizing operation of identified vulnerabilities shall be used. Changes shall be managed through a change management process for all vendor-supplied patches, configuration changes, or changes to the organization's internally developed software. Upon request, the provider informs customer (tenant) of patches and procedures and identified weaknesses especially if customer (tenant) data is used as part the service and/or customer (tenant) has some shared responsibility over implementation of control.	Do you conduct application-layer vulnerability scans regularly as prescribed by industry best practices?			The scope is in charge to the CSP AWS Dedatus retain control of guest operating systems, software and applications and performs regular vulnerability scans and patching of their systems. AWS Security regularly scans all internet-facing service endpoint IP addresses for vulnerabilities. AWS Security notifies the appropriate parties to remediate any identified vulnerabilities. AWS' own maintenance and system patching generally do not impact customers. Refer to ISO 27001 standard, Annex A, domain 12 for additional details. AWS has been validated and certified by an independent auditor to conform alignment with ISO 27001 certification standard.
		TVM-02.1		Do you conduct host operating system-layer vulnerability scans regularly as prescribed by industry best practices?			Dedatus retain control of guest operating systems, software and applications and performs regular vulnerability scans and patching of their systems. AWS Security regularly scans all internet-facing service endpoint IP addresses for vulnerabilities. AWS Security notifies the appropriate parties to remediate any identified vulnerabilities. AWS' own maintenance and system patching generally do not impact customers. Refer to ISO 27001 standard, Annex A, domain 12 for additional details. AWS has been validated and certified by an independent auditor to conform alignment with ISO 27001 certification standard.
Threat and Vulnerability Management (Mobile Code)	TVM-03	TVM-03.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to prevent the execution of unauthorized mobile code, defined as software transferred between systems over a trusted or untrusted network and executed on a local system without explicit installation or execution by the recipient, on organizationally-owned or managed user end-point devices (e.g., issued workstations, laptops, and mobile devices) and IT infrastructure network and system components.	Is mobile code authorized before its installation and use, and the code configuration checked, to ensure that the authorized mobile code operates according to a clearly defined security policy?			AWS Security performs regular vulnerability scans on the host operating system, web application, and databases in the AWS environment using a variety of tools. Dedatus performs vulnerability scans penetration testing, the integrity monitoring and intrusion detection for Amazon EC2 and in-host applications. Dedatus is responsible for maintaining the application of patches to Amazon instance.
		TVM-03.2		Is all unauthorized mobile code prevented from executing?			Dedatus doesn't provide mobile code to be installed on mobile device, because provide a web application. AWS allows customers to manage client and mobile applications to their own requirements.
		TVM-03.3		Do you inform customers (tenant) of patches and procedures and identified weaknesses if customer (tenant) data is used as part the service and/or customer (tenant) has some shared responsibility over implementation of control?			Dedatus provides the result of vulnerability scan to its customer. AWS' Services terms are available at https://aws.amazon.com/service-terms/
		TVM-03.4		Will you make the results of vulnerability scans available to tenants at their request?			AWS Security performs regular vulnerability scans on the host operating system, web application, and databases in the AWS environment using a variety of tools. Dedatus performs vulnerability scans penetration testing, the integrity monitoring and intrusion detection for Amazon EC2 and in-host applications. Dedatus is responsible for maintaining the application of patches to Amazon instance.