



CONSENSUS ASSESSMENTS INITIATIVE QUESTIONNAIRE v4.0.2

Question ID	Question	CSP CAIQ Answer
A&A-01.1	Are audit and assurance policies, procedures, and standards established, documented, approved, communicated, applied, evaluated, and maintained?	Yes
A&A-01.2	Are audit and assurance policies, procedures, and standards reviewed and updated at least annually?	Yes
A&A-02.1	Are independent audit and assurance assessments conducted according to relevant standards at least annually?	Yes
A&A-03.1	Are independent audit and assurance assessments performed according to risk-based plans and policies?	Yes

A&A-04.1	Is compliance verified regarding all relevant standards, regulations, legal/contractual, and statutory requirements applicable to the audit?	Yes
A&A-05.1	Is an audit management process defined and implemented to support audit planning, risk analysis, security control assessments, conclusions, remediation schedules, report generation, and reviews of past reports and supporting evidence?	Yes
A&A-06.1	Is a risk-based corrective action plan to remediate audit findings established, documented, approved, communicated, applied, evaluated, and maintained?	Yes
A&A-06.2	Is the remediation status of audit findings reviewed and reported to relevant stakeholders?	No
AIS-01.1	Are application security policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained to guide appropriate planning, delivery, and support of the organization's application security capabilities?	Yes

AIS-01.2	Are application security policies and procedures reviewed and updated at least annually?	Yes
AIS-02.1	Are baseline requirements to secure different applications established, documented, and maintained?	Yes
AIS-03.1	Are technical and operational metrics defined and implemented according to business objectives, security requirements, and compliance obligations?	Yes
AIS-04.1	Is an SDLC process defined and implemented for application design, development, deployment, and operation per organizationally designed security requirements?	Yes
AIS-05.1	Does the testing strategy outline criteria to accept new information systems, upgrades, and new versions while ensuring application security, compliance adherence, and organizational speed of delivery goals?	Yes

AIS-05.2	Is testing automated when applicable and possible?	No
AIS-06.1	Are strategies and capabilities established and implemented to deploy application code in a secure, standardized, and compliant manner?	Yes
AIS-06.2	Is the deployment and integration of application code automated where possible?	No
AIS-07.1	Are application security vulnerabilities remediated following defined processes?	Yes
AIS-07.2	Is the remediation of application security vulnerabilities automated when possible?	No
BCR-01.1	Are business continuity management and operational resilience policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained?	Yes

BCR-01.2	Are the policies and procedures reviewed and updated at least annually?	Yes
BCR-02.1	Are criteria for developing business continuity and operational resiliency strategies and capabilities established based on business disruption and risk impacts?	Yes
BCR-03.1	Are strategies developed to reduce the impact of, withstand, and recover from business disruptions in accordance with risk appetite?	Yes
BCR-04.1	Are operational resilience strategies and capability results incorporated to establish, document, approve, communicate, apply, evaluate, and maintain a business continuity plan?	Yes
BCR-05.1	Is relevant documentation developed, identified, and acquired to support business continuity and operational resilience plans?	Yes

BCR-05.2	Is business continuity and operational resilience documentation available to authorized stakeholders?	No
BCR-05.3	Is business continuity and operational resilience documentation reviewed periodically?	Yes
BCR-06.1	Are the business continuity and operational resilience plans exercised and tested at least annually and when significant changes occur?	Yes
BCR-07.1	Do business continuity and resilience procedures establish communication with stakeholders and participants?	Yes
BCR-08.1	Is cloud data periodically backed up?	Yes
BCR-08.2	Is the confidentiality, integrity, and availability of backup data ensured?	Yes

BCR-08.3	Can backups be restored appropriately for resiliency?	Yes
BCR-09.1	Is a disaster response plan established, documented, approved, applied, evaluated, and maintained to ensure recovery from natural and man-made disasters?	Yes
BCR-09.2	Is the disaster response plan updated at least annually, and when significant changes occur?	Yes
BCR-10.1	Is the disaster response plan exercised annually or when significant changes occur?	Yes
BCR-10.2	Are local emergency authorities included, if possible, in the exercise?	NA

BCR-11.1	Is business-critical equipment supplemented with redundant equipment independently located at a reasonable minimum distance in accordance with applicable industry standards?	Yes
CCC-01.1	Are risk management policies and procedures associated with changing organizational assets including applications, systems, infrastructure, configuration, etc., established, documented, approved, communicated, applied, evaluated and maintained (regardless of whether asset management is internal or external)?	Yes
CCC-01.2	Are the policies and procedures reviewed and updated at least annually?	Yes
CCC-02.1	Is a defined quality change control, approval and testing process (with established baselines, testing, and release standards) followed?	Yes

CCC-03.1	Are risks associated with changing organizational assets (including applications, systems, infrastructure, configuration, etc.) managed, regardless of whether asset management occurs internally or externally (i.e., outsourced)?	Yes
CCC-04.1	Is the unauthorized addition, removal, update, and management of organization assets restricted?	Yes
CCC-05.1	Are provisions to limit changes that directly impact CSC-owned environments and require tenants to authorize requests explicitly included within the service level agreements (SLAs) between CSPs and CSCs?	Yes
CCC-06.1	Are change management baselines established for all relevant authorized changes on organizational assets?	Yes
CCC-07.1	Are detection measures implemented with proactive notification if changes deviate from established baselines?	Yes

CCC-08.1	Is a procedure implemented to manage exceptions, including emergencies, in the change and configuration process?	Yes
CCC-08.2	'Is the procedure aligned with the requirements of the GRC-04: Policy Exception Process?'	Yes
CCC-09.1	Is a process to proactively roll back changes to a previously known "good state" defined and implemented in case of errors or security concerns?	Yes
CEK-01.1	Are cryptography, encryption, and key management policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained?	Yes
CEK-01.2	Are cryptography, encryption, and key management policies and procedures reviewed and updated at least annually?	Yes
CEK-02.1	Are cryptography, encryption, and key management roles and responsibilities defined and implemented?	Yes

CEK-03.I	Are data at-rest and in-transit cryptographically protected using cryptographic libraries certified to approved standards?	Yes
CEK-04.I	Are appropriate data protection encryption algorithms used that consider data classification, associated risks, and encryption technology usability?	Yes
CEK-05.I	Are standard change management procedures established to review, approve, implement and communicate cryptography, encryption, and key management technology changes that accommodate internal and external sources?	Yes
CEK-06.I	Are changes to cryptography-, encryption- and key management-related systems, policies, and procedures, managed and adopted in a manner that fully accounts for downstream effects of proposed changes, including residual risk, cost, and benefits analysis?	Yes
CEK-07.I	Is a cryptography, encryption, and key management risk program established and maintained that includes risk assessment, risk treatment, risk context, monitoring, and feedback provisions?	Yes

CEK-08.1	Are CSPs providing CSCs with the capacity to manage their own data encryption keys?	No
CEK-09.1	Are encryption and key management systems, policies, and processes audited with a frequency proportional to the system's risk exposure, and after any security event?	Yes
CEK-09.2	Are encryption and key management systems, policies, and processes audited (preferably continuously but at least annually)?	Yes
CEK-10.1	Are cryptographic keys generated using industry-accepted and approved cryptographic libraries that specify algorithm strength and random number generator specifications?	Yes
CEK-11.1	Are private keys provisioned for a unique purpose managed, and is cryptography secret?	Yes

CEK-12.1	Are cryptographic keys rotated based on a cryptoperiod calculated while considering information disclosure risks and legal and regulatory requirements?	No
CEK-13.1	Are cryptographic keys revoked and removed before the end of the established cryptoperiod (when a key is compromised, or an entity is no longer part of the organization) per defined, implemented, and evaluated processes, procedures, and technical measures to include legal and regulatory requirement provisions?	Yes
CEK-14.1	Are processes, procedures and technical measures to destroy unneeded keys defined, implemented and evaluated to address key destruction outside secure environments, revocation of keys stored in hardware security modules (HSMs), and include applicable legal and regulatory requirement provisions?	Yes
CEK-15.1	Are processes, procedures, and technical measures to create keys in a pre-activated state (i.e., when they have been generated but not authorized for use) being defined, implemented, and evaluated to include legal and regulatory requirement provisions?	No

CEK-16.1	Are processes, procedures, and technical measures to monitor, review and approve key transitions (e.g., from any state to/from suspension) being defined, implemented, and evaluated to include legal and regulatory requirement provisions?	Yes
CEK-17.1	Are processes, procedures, and technical measures to deactivate keys (at the time of their expiration date) being defined, implemented, and evaluated to include legal and regulatory requirement provisions?	Yes
CEK-18.1	Are processes, procedures, and technical measures to manage archived keys in a secure repository (requiring least privilege access) being defined, implemented, and evaluated to include legal and regulatory requirement provisions?	Yes
CEK-19.1	Are processes, procedures, and technical measures to encrypt information in specific scenarios (e.g., only in controlled circumstances and thereafter only for data decryption and never for encryption) being defined, implemented, and evaluated to include legal and regulatory requirement provisions?	No

CEK-20.I	Are processes, procedures, and technical measures to assess operational continuity risks (versus the risk of losing control of keying material and exposing protected data) being defined, implemented, and evaluated to include legal and regulatory requirement provisions?	Yes
CEK-21.I	Are key management system processes, procedures, and technical measures being defined, implemented, and evaluated to track and report all cryptographic materials and status changes that include legal and regulatory requirements provisions?	No
DCS-01.I	Are policies and procedures for the secure disposal of equipment used outside the organization's premises established, documented, approved, communicated, enforced, and maintained?	Yes

DCS-01.2	Is a data destruction procedure applied that renders information recovery information impossible if equipment is not physically destroyed?	Yes
DCS-01.3	Are policies and procedures for the secure disposal of equipment used outside the organization's premises reviewed and updated at least annually?	Yes
DCS-02.1	Are policies and procedures for the relocation or transfer of hardware, software, or data/information to an offsite or alternate location established, documented, approved, communicated, implemented, enforced, maintained?	Yes
DCS-02.2	Does a relocation or transfer request require written or cryptographically verifiable authorization?	Yes

DCS-02.3	Are policies and procedures for the relocation or transfer of hardware, software, or data/information to an offsite or alternate location reviewed and updated at least annually?	Yes
DCS-03.1	Are policies and procedures for maintaining a safe and secure working environment (in offices, rooms, and facilities) established, documented, approved, communicated, enforced, and maintained?	Yes
DCS-03.2	Are policies and procedures for maintaining safe, secure working environments (e.g., offices, rooms) reviewed and updated at least annually?	Yes
DCS-04.1	Are policies and procedures for the secure transportation of physical media established, documented, approved, communicated, enforced, evaluated, and maintained?	Yes

DCS-04.2	Are policies and procedures for the secure transportation of physical media reviewed and updated at least annually?	Yes
DCS-05.1	Is the classification and documentation of physical and logical assets based on the organizational business risk?	Yes
DCS-06.1	Are all relevant physical and logical assets at all CSP sites cataloged and tracked within a secured system?	Yes
DCS-07.1	Are physical security perimeters implemented to safeguard personnel, data, and information systems?	Yes
DCS-07.2	Are physical security perimeters established between administrative and business areas, data storage, and processing facilities?	Yes
DCS-08.1	Is equipment identification used as a method for connection authentication?	Yes

DCS-09.1	Are solely authorized personnel able to access secure areas, with all ingress and egress areas restricted, documented, and monitored by physical access control mechanisms?	Yes
DCS-09.2	Are access control records retained periodically, as deemed appropriate by the organization?	Yes
DCS-10.1	Are external perimeter datacenter surveillance systems and surveillance systems at all ingress and egress points implemented, maintained, and operated?	Yes
DCS-11.1	Are datacenter personnel trained to respond to unauthorized access or egress attempts?	Yes
DCS-12.1	Are processes, procedures, and technical measures defined, implemented, and evaluated to ensure risk-based protection of power and telecommunication cables from interception, interference, or damage threats at all facilities, offices, and rooms?	Yes

DCS-13.1	Are data center environmental control systems designed to monitor, maintain, and test that on-site temperature and humidity conditions fall within accepted industry standards effectively implemented and maintained?	Yes
DCS-14.1	Are utility services secured, monitored, maintained, and tested at planned intervals for continual effectiveness?	Yes
DCS-15.1	Is business-critical equipment segregated from locations subject to a high probability of environmental risk events?	Yes
DSP-01.1	Are policies and procedures established, documented, approved, communicated, enforced, evaluated, and maintained for the classification, protection, and handling of data throughout its lifecycle according to all applicable laws and regulations, standards, and risk level?	Yes
DSP-01.2	Are data security and privacy policies and procedures reviewed and updated at least annually?	Yes

DSP-02.1	Are industry-accepted methods applied for secure data disposal from storage media so information is not recoverable by any forensic means?	Yes
DSP-03.1	Is a data inventory created and maintained for sensitive and personal information (at a minimum)?	NA
DSP-04.1	Is data classified according to type and sensitivity levels?	NA
DSP-05.1	Is data flow documentation created to identify what data is processed and where it is stored and transmitted?	Yes
DSP-05.2	Is data flow documentation reviewed at defined intervals, at least annually, and after any change?	Yes
DSP-06.1	Is the ownership and stewardship of all relevant personal and sensitive data documented?	NA

DSP-06.2	Is data ownership and stewardship documentation reviewed at least annually?	NA
DSP-07.1	Are systems, products, and business practices based on security principles by design and per industry best practices?	Yes
DSP-08.1	Are systems, products, and business practices based on privacy principles by design and according to industry best practices?	Yes
DSP-08.2	Are systems' privacy settings configured by default and according to all applicable laws and regulations?	Yes
DSP-09.1	Is a data protection impact assessment (DPIA) conducted when processing personal data and evaluating the origin, nature, particularity, and severity of risks according to any applicable laws, regulations and industry best practices?	NA

DSP-10.1	Are processes, procedures, and technical measures defined, implemented, and evaluated to ensure any transfer of personal or sensitive data is protected from unauthorized access and only processed within scope (as permitted by respective laws and regulations)?	NA
DSP-11.1	Are processes, procedures, and technical measures defined, implemented, and evaluated to enable data subjects to request access to, modify, or delete personal data (per applicable laws and regulations)?	Yes
DSP-12.1	Are processes, procedures, and technical measures defined, implemented, and evaluated to ensure personal data is processed (per applicable laws and regulations and for the purposes declared to the data subject)?	Yes
DSP-13.1	Are processes, procedures, and technical measures defined, implemented, and evaluated for the transfer and sub-processing of personal data within the service supply chain (according to any applicable laws and regulations)?	Yes

DSP-14.1	Are processes, procedures, and technical measures defined, implemented, and evaluated to disclose details to the data owner of any personal or sensitive data access by sub-processors before processing initiation?	Yes
DSP-15.1	Is authorization from data owners obtained, and the associated risk managed, before replicating or using production data in non-production environments?	Yes
DSP-16.1	Do data retention, archiving, and deletion practices follow business requirements, applicable laws, and regulations?	Yes
DSP-17.1	Are processes, procedures, and technical measures defined and implemented to protect sensitive data throughout its lifecycle?	Yes
DSP-18.1	Does the CSP have in place, and describe to CSCs, the procedure to manage and respond to requests for disclosure of Personal Data by Law Enforcement Authorities according to applicable laws and regulations?	Yes

DSP-18.2	Does the CSP give special attention to the notification procedure to interested CSCs, unless otherwise prohibited, such as a prohibition under criminal law to preserve confidentiality of a law enforcement investigation?	Yes
DSP-19.1	Are processes, procedures, and technical measures defined and implemented to specify and document physical data locations, including locales where data is processed or backed up?	Yes
GRC-01.1	Are information governance program policies and procedures sponsored by organizational leadership established, documented, approved, communicated, applied, evaluated, and maintained?	Yes

GRC-01.2	Are the policies and procedures reviewed and updated at least annually?	Yes
GRC-02.1	Is there an established formal, documented, and leadership-sponsored enterprise risk management (ERM) program that includes policies and procedures for identification, evaluation, ownership, treatment, and acceptance of cloud security and privacy risks?	Yes
GRC-03.1	Are all relevant organizational policies and associated procedures reviewed at least annually, or when a substantial organizational change occurs?	Yes
GRC-04.1	Is an approved exception process mandated by the governance program established and followed whenever a deviation from an established policy occurs?	Yes
GRC-05.1	Has an information security program (including programs of all relevant CCM domains) been developed and implemented?	Yes

GRC-06.I	Are roles and responsibilities for planning, implementing, operating, assessing, and improving governance programs defined and documented?	Yes
GRC-07.I	Are all relevant standards, regulations, legal/contractual, and statutory requirements applicable to your organization identified and documented?	Yes
GRC-08.I	Is contact established and maintained with cloud-related special interest groups and other relevant entities?	Yes
HRS-01.I	Are background verification policies and procedures of all new employees (including but not limited to remote employees, contractors, and third parties) established, documented, approved, communicated, applied, evaluated, and maintained?	Yes

HRS-01.2	Are background verification policies and procedures designed according to local laws, regulations, ethics, and contractual constraints and proportional to the data classification to be accessed, business requirements, and acceptable risk?	Yes
HRS-01.3	Are background verification policies and procedures reviewed and updated at least annually?	Yes
HRS-02.1	Are policies and procedures for defining allowances and conditions for the acceptable use of organizationally-owned or managed assets established, documented, approved, communicated, applied, evaluated, and maintained?	Yes

HRS-02.2	Are the policies and procedures for defining allowances and conditions for the acceptable use of organizationally-owned or managed assets reviewed and updated at least annually?	Yes
HRS-03.1	Are policies and procedures requiring unattended workspaces to conceal confidential data established, documented, approved, communicated, applied, evaluated, and maintained?	Yes
HRS-03.2	Are policies and procedures requiring unattended workspaces to conceal confidential data reviewed and updated at least annually?	Yes
HRS-04.1	Are policies and procedures to protect information accessed, processed, or stored at remote sites and locations established, documented, approved, communicated, applied, evaluated, and maintained?	Yes

HRS-04.2	Are policies and procedures to protect information accessed, processed, or stored at remote sites and locations reviewed and updated at least annually?	Yes
HRS-05.1	Are return procedures of organizationally-owned assets by terminated employees established and documented?	Yes
HRS-06.1	Are procedures outlining the roles and responsibilities concerning changes in employment established, documented, and communicated to all personnel?	Yes
HRS-07.1	Are employees required to sign an employment agreement before gaining access to organizational information systems, resources, and assets?	Yes
HRS-08.1	Are provisions and/or terms for adherence to established information governance and security policies included within employment agreements?	Yes
HRS-09.1	Are employee roles and responsibilities relating to information assets and security documented and communicated?	Yes

HRS-10.1	Are requirements for non-disclosure/confidentiality agreements reflecting organizational data protection needs and operational details identified, documented, and reviewed at planned intervals?	Yes
HRS-11.1	Is a security awareness training program for all employees of the organization established, documented, approved, communicated, applied, evaluated and maintained?	Yes
HRS-11.2	Are regular security awareness training updates provided?	Yes
HRS-12.1	Are all employees granted access to sensitive organizational and personal data provided with appropriate security awareness training?	Yes
HRS-12.2	Are all employees granted access to sensitive organizational and personal data provided with regular updates in procedures, processes, and policies relating to their professional function?	Yes

HRS-13.1	Are employees notified of their roles and responsibilities to maintain awareness and compliance with established policies, procedures, and applicable legal, statutory, or regulatory compliance obligations?	Yes
IAM-01.1	Are identity and access management policies and procedures established, documented, approved, communicated, implemented, applied, evaluated, and maintained?	Yes
IAM-01.2	Are identity and access management policies and procedures reviewed and updated at least annually?	Yes
IAM-02.1	Are strong password policies and procedures established, documented, approved, communicated, implemented, applied, evaluated, and maintained?	Yes
IAM-02.2	Are strong password policies and procedures reviewed and updated at least annually?	Yes

IAM-03.I	Is system identity information and levels of access managed, stored, and reviewed?	Yes
IAM-04.I	Is the separation of duties principle employed when implementing information system access?	Yes
IAM-05.I	Is the least privilege principle employed when implementing information system access?	Yes
IAM-06.I	Is a user access provisioning process defined and implemented which authorizes, records, and communicates data and assets access changes?	Yes
IAM-07.I	Is a process in place to de-provision or modify the access, in a timely manner, of movers / leavers or system identity changes, to effectively adopt and communicate identity and access management policies?	Yes
IAM-08.I	Are reviews and revalidation of user access for least privilege and separation of duties completed with a frequency commensurate with organizational risk tolerance?	Yes

IAM-09.1	Are processes, procedures, and technical measures for the segregation of privileged access roles defined, implemented, and evaluated such that administrative data access, encryption, key management capabilities, and logging capabilities are distinct and separate?	Yes
IAM-10.1	Is an access process defined and implemented to ensure privileged access roles and rights are granted for a limited period?	Yes
IAM-10.2	Are procedures implemented to prevent the culmination of segregated privileged access?	Yes
IAM-11.1	Are processes and procedures for customers to participate, where applicable, in granting access for agreed, high risk as (defined by the organizational risk assessment) privileged access roles defined, implemented and evaluated?	NA
IAM-12.1	Are processes, procedures, and technical measures to ensure the logging infrastructure is "read-only" for all with write access (including privileged access roles) defined, implemented, and evaluated?	Yes

IAM-12.2	Is the ability to disable the "read-only" configuration of logging infrastructure controlled through a procedure that ensures the segregation of duties and break glass procedures?	Yes
IAM-13.1	Are processes, procedures, and technical measures that ensure users are identifiable through unique identification (or can associate individuals with user identification usage) defined, implemented, and evaluated?	Yes
IAM-14.1	Are processes, procedures, and technical measures for authenticating access to systems, application, and data assets including multifactor authentication for a least-privileged user and sensitive data access defined, implemented, and evaluated?	No
IAM-14.2	Are digital certificates or alternatives that achieve an equivalent security level for system identities adopted?	Yes

IAM-15.1	Are processes, procedures, and technical measures for the secure management of passwords defined, implemented, and evaluated?	Yes
IAM-16.1	Are processes, procedures, and technical measures to verify access to data and system functions authorized, defined, implemented, and evaluated?	Yes
IPY-01.1	Are policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained for communications between application services (e.g., APIs)?	Yes
IPY-01.2	Are policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained for information processing interoperability?	Yes

IPY-01.3	Are policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained for application development portability?	Yes
IPY-01.4	Are policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained for information/data exchange, usage, portability, integrity, and persistence?	Yes
IPY-01.5	Are interoperability and portability policies and procedures reviewed and updated at least annually?	Yes

IPY-02.1	Are CSCs able to programmatically retrieve their data via an application interface(s) to enable interoperability and portability?	Yes
IPY-03.1	Are cryptographically secure and standardized network protocols implemented for the management, import, and export of data?	Yes
IPY-04.1	Do agreements include provisions specifying CSC data access upon contract termination, and have the following? a. Data format b. Duration data will be stored c. Scope of the data retained and made available to the CSCs d. Data deletion policy	Yes
IVS-01.1	Are infrastructure and virtualization security policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained?	Yes
IVS-01.2	Are infrastructure and virtualization security policies and procedures reviewed and updated at least annually?	Yes

IVS-02.1	Is resource availability, quality, and capacity planned and monitored in a way that delivers required system performance, as determined by the business?	Yes
IVS-03.1	Are communications between environments monitored?	Yes
IVS-03.2	Are communications between environments encrypted?	Yes
IVS-03.3	Are communications between environments restricted to only authenticated and authorized connections, as justified by the business?	Yes

IVS-03.4	Are network configurations reviewed at least annually?	Yes
IVS-03.5	Are network configurations supported by the documented justification of all allowed services, protocols, ports, and compensating controls?	Yes
IVS-04.1	Is every host and guest OS, hypervisor, or infrastructure control plane hardened (according to their respective best practices) and supported by technical controls as part of a security baseline?	Yes
IVS-05.1	Are production and non-production environments separated?	Yes

IVS-06.1	Are applications and infrastructures designed, developed, deployed, and configured such that CSP and CSC (tenant) user access and intra-tenant access is appropriately segmented, segregated, monitored, and restricted from other tenants?	Yes
IVS-07.1	Are secure and encrypted communication channels including only up-to-date and approved protocols used when migrating servers, services, applications, or data to cloud environments?	Yes
IVS-08.1	Are high-risk environments identified and documented?	Yes
IVS-09.1	Are processes, procedures, and defense-in-depth techniques defined, implemented, and evaluated for protection, detection, and timely response to network-based attacks?	Yes
LOG-01.1	Are logging and monitoring policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained?	Yes

LOG-01.2	Are policies and procedures reviewed and updated at least annually?	Yes
LOG-02.1	Are processes, procedures, and technical measures defined, implemented, and evaluated to ensure audit log security and retention?	Yes
LOG-03.1	Are security-related events identified and monitored within applications and the underlying infrastructure?	Yes
LOG-03.2	Is a system defined and implemented to generate alerts to responsible stakeholders based on security events and their corresponding metrics?	Yes
LOG-04.1	Is access to audit logs restricted to authorized personnel, and are records maintained to provide unique access accountability?	Yes

LOG-05.1	Are security audit logs monitored to detect activity outside of typical or expected patterns?	Yes
LOG-05.2	Is a process established and followed to review and take appropriate and timely actions on detected anomalies?	Yes
LOG-06.1	Is a reliable time source being used across all relevant information processing systems?	Yes
LOG-07.1	Are logging requirements for information meta/data system events established, documented, and implemented?	Yes
LOG-07.2	Is the scope reviewed and updated at least annually, or whenever there is a change in the threat environment?	Yes

LOG-08.1	Are audit records generated, and do they contain relevant security information?	Yes
LOG-09.1	Does the information system protect audit records from unauthorized access, modification, and deletion?	Yes
LOG-10.1	Are monitoring and internal reporting capabilities established to report on cryptographic operations, encryption, and key management policies, processes, procedures, and controls?	No
LOG-11.1	Are key lifecycle management events logged and monitored to enable auditing and reporting on cryptographic keys' usage?	No
LOG-12.1	Is physical access logged and monitored using an auditable access control system?	NA
LOG-13.1	Are processes and technical measures for reporting monitoring system anomalies and failures defined, implemented, and evaluated?	Yes

LOG-13.2	Are accountable parties immediately notified about anomalies and failures?	Yes
SEF-01.1	Are policies and procedures for security incident management, e-discovery, and cloud forensics established, documented, approved, communicated, applied, evaluated, and maintained?	Yes
SEF-01.2	Are policies and procedures reviewed and updated annually?	Yes
SEF-02.1	Are policies and procedures for timely management of security incidents established, documented, approved, communicated, applied, evaluated, and maintained?	Yes
SEF-02.2	Are policies and procedures for timely management of security incidents reviewed and updated at least annually?	Yes

SEF-03.1	Is a security incident response plan that includes relevant internal departments, impacted CSCs, and other business-critical relationships (such as supply-chain) established, documented, approved, communicated, applied, evaluated, and maintained?	Yes
SEF-04.1	Is the security incident response plan tested and updated for effectiveness, as necessary, at planned intervals or upon significant organizational or environmental changes?	Yes
SEF-05.1	Are information security incident metrics established and monitored?	Yes
SEF-06.1	Are processes, procedures, and technical measures supporting business processes to triage security-related events defined, implemented, and evaluated?	Yes
SEF-07.1	Are processes, procedures, and technical measures for security breach notifications defined and implemented?	Yes

SEF-07.2	Are security breaches and assumed security breaches reported (including any relevant supply chain breaches) as per applicable SLAs, laws, and regulations?	Yes
SEF-08.1	Are points of contact maintained for applicable regulation authorities, national and local law enforcement, and other legal jurisdictional authorities?	Yes
STA-01.1	Are policies and procedures implementing the shared security responsibility model (SSRM) within the organization established, documented, approved, communicated, applied, evaluated, and maintained?	Yes
STA-01.2	Are the policies and procedures that apply the SSRM reviewed and updated annually?	Yes

STA-02.I	Is the SSRM applied, documented, implemented, and managed throughout the supply chain for the cloud service offering?	Yes
STA-03.I	Is the CSC given SSRM guidance detailing information about SSRM applicability throughout the supply chain?	No
STA-04.I	Is the shared ownership and applicability of all CSA CCM controls delineated according to the SSRM for the cloud service offering?	Yes
STA-05.I	Is SSRM documentation for all cloud services the organization uses reviewed and validated?	Yes
STA-06.I	Are the portions of the SSRM the organization is responsible for implemented, operated, audited, or assessed?	Yes
STA-07.I	Is an inventory of all supply chain relationships developed and maintained?	Yes
STA-08.I	Are risk factors associated with all organizations within the supply chain periodically reviewed by CSPs?	Yes

<p>STA-09.I</p>	<p>Do service agreements between CSPs and CSCs (tenants) incorporate at least the following mutually agreed upon provisions and/or terms?</p> <ul style="list-style-type: none"> • Scope, characteristics, and location of business relationship and services offered • Information security requirements (including SSRM) • Change management process • Logging and monitoring capability • Incident management and communication procedures • Right to audit and third-party assessment • Service termination • Interoperability and portability requirements • Data privacy 	<p>Yes</p>
<p>STA-10.I</p>	<p>Are supply chain agreements between CSPs and CSCs reviewed at least annually?</p>	<p>Yes</p>
<p>STA-11.I</p>	<p>Is there a process for conducting internal assessments at least annually to confirm the conformance and effectiveness of standards, policies, procedures, and SLA activities?</p>	<p>Yes</p>
<p>STA-12.I</p>	<p>Are policies that require all supply chain CSPs to comply with information security, confidentiality, access control, privacy, audit, personnel policy, and service level requirements and standards implemented?</p>	<p>Yes</p>

STA-13.1	Are supply chain partner IT governance policies and procedures reviewed periodically?	Yes
STA-14.1	Is a process to conduct periodic security assessments for all supply chain organizations defined and implemented?	Yes
TVM-01.1	Are policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained to identify, report, and prioritize the remediation of vulnerabilities to protect systems against vulnerability exploitation?	Yes
TVM-01.2	Are threat and vulnerability management policies and procedures reviewed and updated at least annually?	Yes
TVM-02.1	Are policies and procedures to protect against malware on managed assets established, documented, approved, communicated, applied, evaluated, and maintained?	Yes
TVM-02.2	Are asset management and malware protection policies and procedures reviewed and updated at least annually?	Yes

TVM-03.I	Are processes, procedures, and technical measures defined, implemented, and evaluated to enable scheduled and emergency responses to vulnerability identifications (based on the identified risk)?	Yes
TVM-04.I	Are processes, procedures, and technical measures defined, implemented, and evaluated to update detection tools, threat signatures, and compromise indicators weekly (or more frequent) basis?	Yes
TVM-05.I	Are processes, procedures, and technical measures defined, implemented, and evaluated to identify updates for applications that use third-party or open-source libraries (according to the organization's vulnerability management policy)?	NA
TVM-06.I	Are processes, procedures, and technical measures defined, implemented, and evaluated for periodic, independent, third-party penetration testing?	Yes
TVM-07.I	Are processes, procedures, and technical measures defined, implemented, and evaluated for vulnerability detection on organizationally managed assets at least monthly?	Yes

TVM-08.1	Is vulnerability remediation prioritized using a risk-based model from an industry-recognized framework?	Yes
TVM-09.1	Is a process defined and implemented to track and report vulnerability identification and remediation activities that include stakeholder notification?	No
TVM-10.1	Are metrics for vulnerability identification and remediation established, monitored, and reported at defined intervals?	Yes
UEM-01.1	Are policies and procedures established, documented, approved, communicated, applied, evaluated, and maintained for all endpoints?	Yes
UEM-01.2	Are universal endpoint management policies and procedures reviewed and updated at least annually?	Yes
UEM-02.1	Is there a defined, documented, applicable and evaluated list containing approved services, applications, and the sources of applications (stores) acceptable for use by endpoints when accessing or storing organization-managed data?	Yes

UEM-03.I	Is a process defined and implemented to validate endpoint device compatibility with operating systems and applications?	Yes
UEM-04.I	Is an inventory of all endpoints used and maintained to store and access company data?	Yes
UEM-05.I	Are processes, procedures, and technical measures defined, implemented and evaluated, to enforce policies and controls for all endpoints permitted to access systems and/or store, transmit, or process organizational data?	Yes
UEM-06.I	Are all relevant interactive-use endpoints configured to require an automatic lock screen?	Yes
UEM-07.I	Are changes to endpoint operating systems, patch levels, and/or applications managed through the organizational change management process?	Yes
UEM-08.I	Is information protected from unauthorized disclosure on managed endpoints with storage encryption?	No

UEM-09.1	Are anti-malware detection and prevention technology services configured on managed endpoints?	Yes
UEM-10.1	Are software firewalls configured on managed endpoints?	Yes
UEM-11.1	Are managed endpoints configured with data loss prevention (DLP) technologies and rules per a risk assessment?	Yes
UEM-12.1	Are remote geolocation capabilities enabled for all managed mobile endpoints?	NA
UEM-13.1	Are processes, procedures, and technical measures defined, implemented, and evaluated to enable remote company data deletion on managed endpoint devices?	No
UEM-14.1	Are processes, procedures, and technical and/or contractual measures defined, implemented, and evaluated to maintain proper security of third-party endpoints with access to organizational assets?	Yes

End of Standard

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SSRM Control Ownership	CSP Implementation Description (Optional/Recommended)	CSC Responsibilities (Optional/Recommended)
Shared CSP and CSC		
Shared CSP and CSC		
Shared CSP and CSC		in fase di certificazione ISO27001
Shared CSP and CSC		

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

Esistono procedure specifiche

CSC-owned

I report di audit sono a disposizione su richiesta

CSC-owned

CSC-owned

CSC-owned

CSC-owned

CSC-owned

La Società applica le best practice OWASP del settore

CSC-owned

Test di sicurezza eseguiti tenendo in considerazione gli standard di settore tra cui le OWASP test guide

CSC-owned

CSC-owned

CSC-owned

Shared CSP and CSC

CSC-owned

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

La piattaforma SaaS e' implementata su un'infrastruttura certificata (CSP Qualificato AgID in possesso di certificazioni ISO 27001, 27017 e 27018)

Shared CSP and CSC

Shared CSP and CSC

CSC-owned

Sono a disposizione su richiesta dei report riassuntivi generici

Shared CSP and CSC

Shared CSP and CSC

CSC-owned

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

CSC-owned

Shared CSP and CSC

Dati conservati in ambiente cloud certificato e garantito

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

CSC-owned

CSC-owned

CSC-owned

CSC-owned

CSC-owned

Shared CSP and CSC

Shared CSP and CSC

CSP-owned

Shared CSP and CSC

I dati vengono utilizzati algoritmi di cifratura solo per i dati in transito

Shared CSP and CSC



Shared CSP and CSC

Shared CSP and CSC



Shared CSP and CSC

CSP-owned

CSP-owned

CSP-owned

CSP-owned

CSP-owned

CSP-owned

CSP-owned



CSP-owned

CSP-owned



CSP-owned

CSP-owned

CSP-owned

CSP-owned

CSP-owned

CSP-owned

CSP-owned

Viene Utilizzato un datacenter di un CSP certificato e qualificato AgID, che garantisce che l'infrastruttura e i processi siano conformi a quanto previsto dalla ISO 27001, 27017 e 27018

CSC-owned

CSP-owned

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CSC-owned

CSC-owned

CSC-owned

CSP-owned

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Shared CSP and CSC

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CSC-owned

CSC-owned

CSC-owned

CSC-owned

I dati vengono importati localmente sotto forma di codici numerici perdendo tutte le informazioni sensibili

CSC-owned

CSC-owned

I dati vengono importati localmente sotto forma di codici numerici perdendo tutte le informazioni sensibili

CSC-owned

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CSC-owned

I dati vengono importati localmente sotto forma di codici numerici perdendo tutte le informazioni sensibili

Shared CSP and CSC

In compliance con il gdpr art. 25

Shared CSP and CSC

In compliance con il gdpr art. 25

Shared CSP and CSC

In compliance con il gdpr art. 25

CSC-owned

In base all'Art. 35 del gdpr Il trattamento dei dati effettuato attraverso il servizio SAS NextOne non rappresenta un rischio elevato per i diritti e le libertà delle persone fisiche.
Pertanto non si richiede necessario eseguire una valutazione d'impatto.

CSC-owned

I dati personali non vengono trasferiti all'esterno del perimetro del CSP qualificato

CSC-owned



CSC-owned

CSC-owned



CSC-owned

CSC-owned

CSC-owned

Shared CSP and CSC

Per la parte delle misure di sicurezza fisica vengono applicate dal CSp qualificato ISO 27001, 27017, 018 (data center del servizio SAAS)

CSP-owned

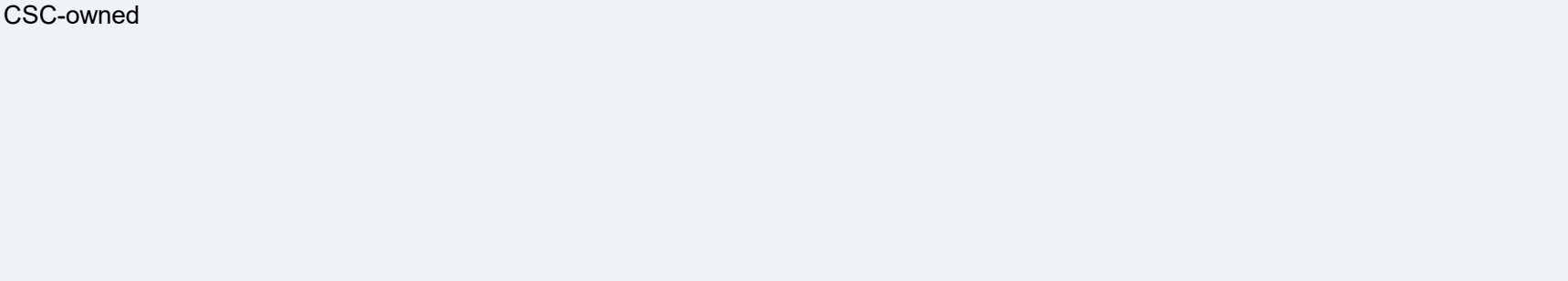
CSP-owned

CSC-owned

CSC-owned

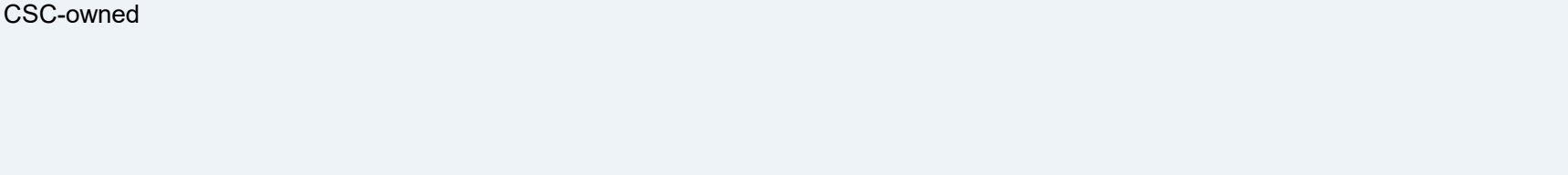
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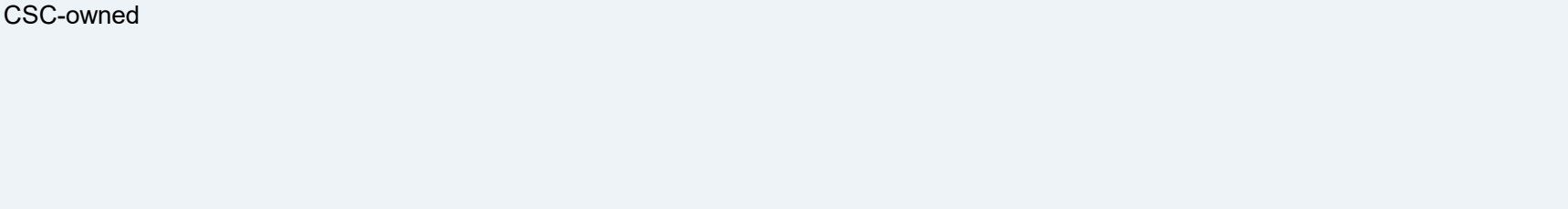
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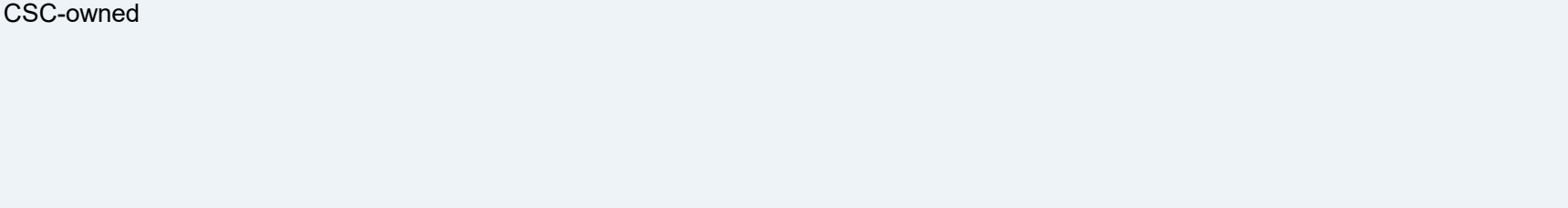
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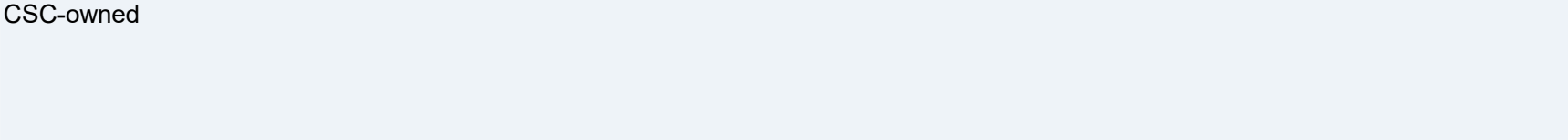
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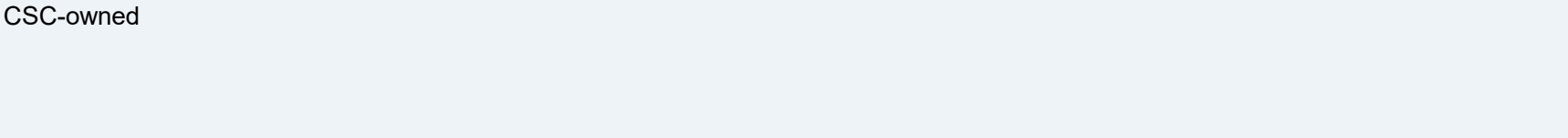
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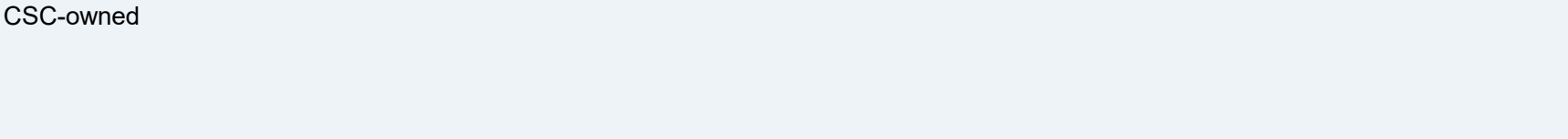
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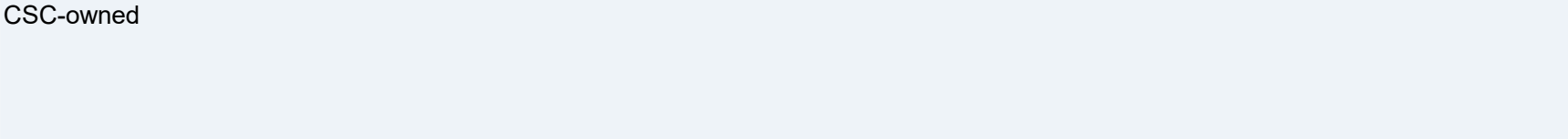
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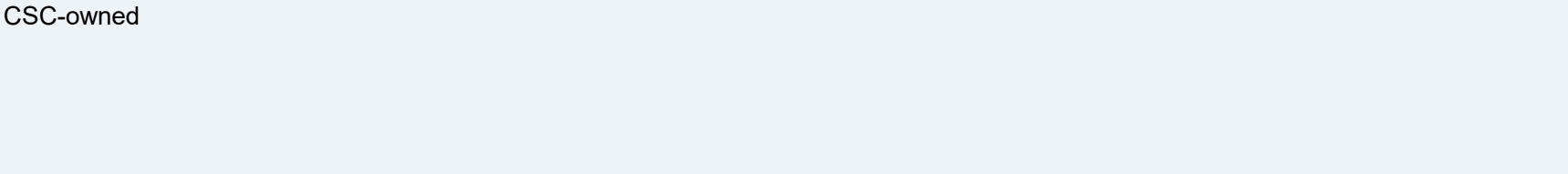
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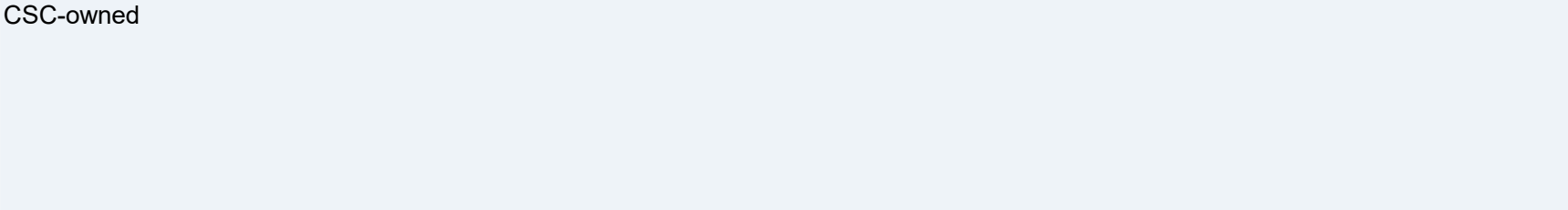
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Non vengono utilizzate soluzioni di strong authentication

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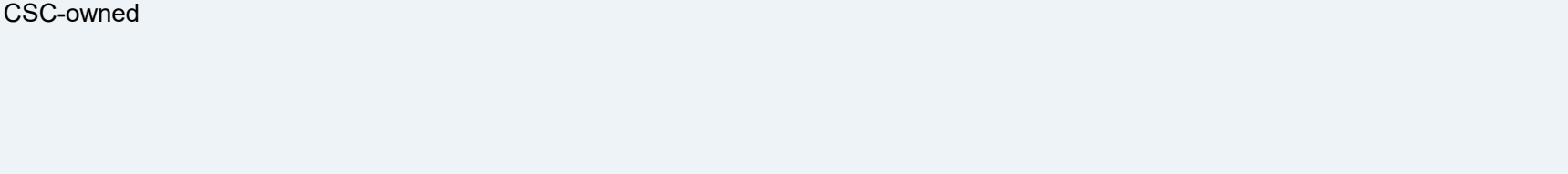
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Shared CSP and CSC

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Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

CSC-owned

CSC-owned

Servizio SaaS strutturato secondo un modello "multi-tenant"

Shared CSP and CSC

CSC-owned

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

In compliace con la normativa sulla protezione dei dati (riferimento normativo: provvedimento sugli amministratori di sistema emanato dal Garante per la protezione dei dati - provvedimento del 27 novembre 2008)

Shared CSP and CSC

In compliace con la normativa sulla protezione dei dati (riferimento normativo: provvedimento sugli amministratori di sistema emanato dal Garante per la protezione dei dati - provvedimento del 27 novembre 2008)

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

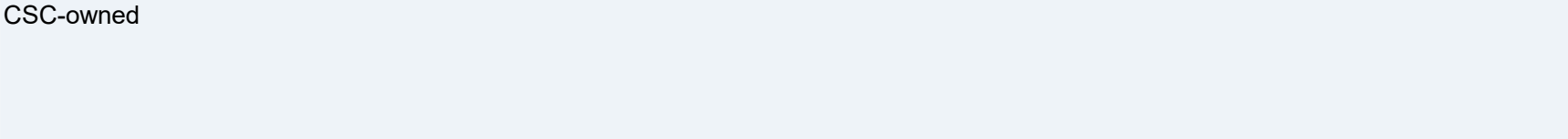
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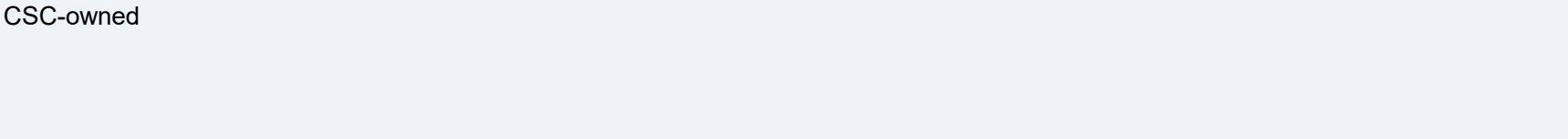
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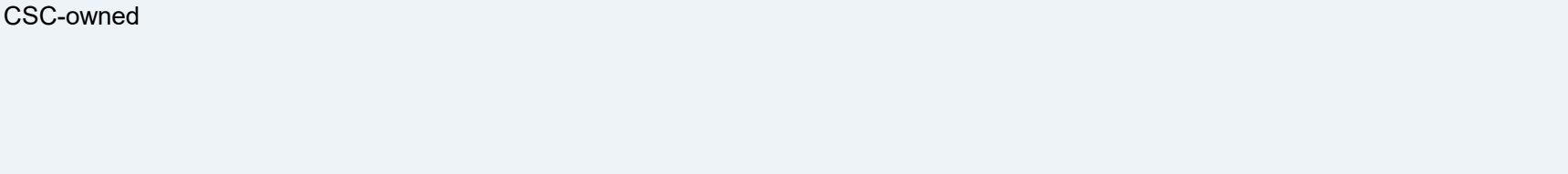
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Non si applica il processo di e-discovery

CSC-owned

CSC-owned

CSC-owned

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

Shared CSP and CSC

CSC-owned

In caso di data breach vengono applicate le modalità previste sul sito del Garante per la protezione dei dati personali.

CSC-owned

In base alle politiche e alle procedure del sistema di gestione 9001

CSC-owned

In base alle politiche e alle procedure del sistema di gestione 9001

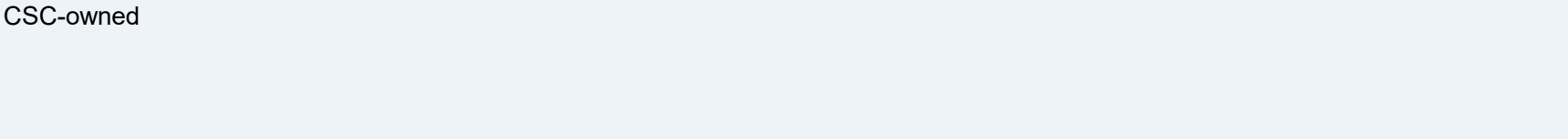
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Shared CSP and CSC

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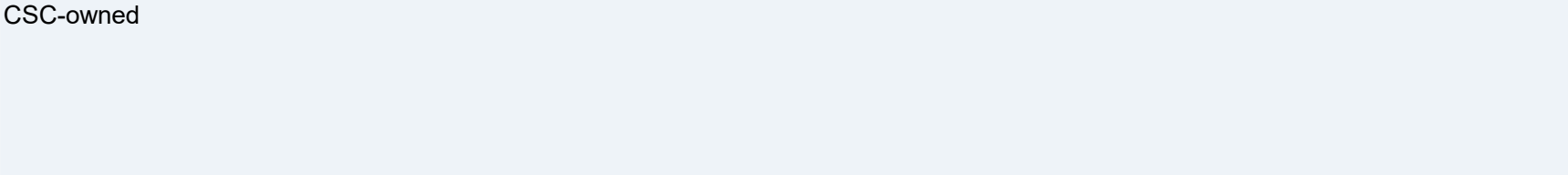
Il servizio SaaS non utilizza librerie di terze parti o open-source

CSC-owned

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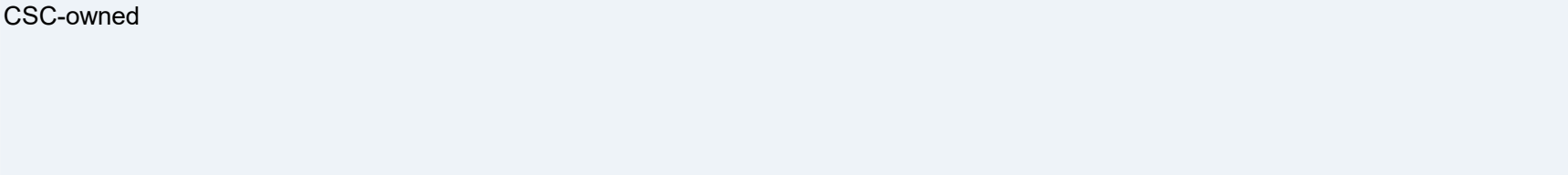
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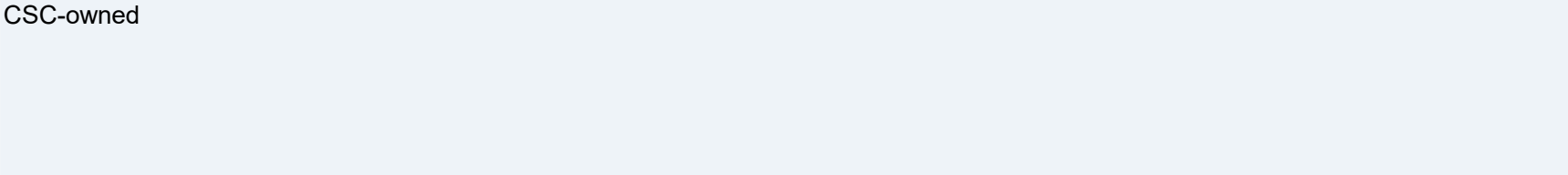
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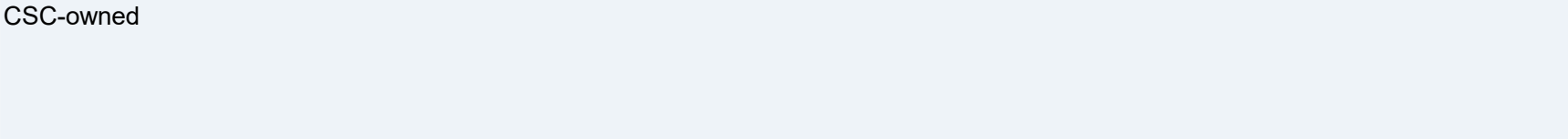
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CSC-owned

Non viene applicata la funzionalità di geolocalizzazione remota

CSC-owned

CSC-owned

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CCM Control ID	CCM Control Specification	CCM Control Title
A&A-01	Establish, document, approve, communicate, apply, evaluate and maintain audit and assurance policies and procedures and standards. Review and update the policies and procedures at least annually.	Audit and Assurance Policy and Procedures
A&A-02	Conduct independent audit and assurance assessments according to relevant standards at least annually.	Independent Assessments
A&A-03	Perform independent audit and assurance assessments according to risk-based plans and policies.	Risk Based Planning Assessment

A&A-04	Verify compliance with all relevant standards, regulations, legal/contractual, and statutory requirements applicable to the audit.	Requirements Compliance
A&A-05	Define and implement an Audit Management process to support audit planning, risk analysis, security control assessment, conclusion, remediation schedules, report generation, and review of past reports and supporting evidence.	Audit Management Process
A&A-06	Establish, document, approve, communicate, apply, evaluate and maintain a risk-based corrective action plan to remediate audit findings, review and report remediation status to relevant stakeholders.	Remediation
AISC-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for application security to provide guidance to the appropriate planning, delivery and support of the organization's application security capabilities. Review and update the policies and procedures at least annually.	Application and Interface Security Policy and

AIS-01		Security Policy and Procedures
AIS-02	Establish, document and maintain baseline requirements for securing different applications.	Application Security Baseline Requirements
AIS-03	Define and implement technical and operational metrics in alignment with business objectives, security requirements, and compliance obligations.	Application Security Metrics
AIS-04	Define and implement a SDLC process for application design, development, deployment, and operation in accordance with security requirements defined by the organization.	Secure Application Design and Development
AIS-05	Implement a testing strategy, including criteria for acceptance of new information systems, upgrades and new versions, which provides application security assurance and maintains compliance while enabling organizational speed	Automated Application

<p>AIS-05</p>	<p>of delivery goals. Automate when applicable and possible.</p>	<p>Security Testing</p>
<p>AIS-06</p>	<p>Establish and implement strategies and capabilities for secure, standardized, and compliant application deployment. Automate where possible.</p>	<p>Automated Secure Application Deployment</p>
<p>AIS-07</p>	<p>Define and implement a process to remediate application security vulnerabilities, automating remediation when possible.</p>	<p>Application Vulnerability Remediation</p>
<p>RCR-01</p>	<p>Establish, document, approve, communicate, apply, evaluate and maintain business continuity management and operational resilience policies and procedures. Review and update the policies and procedures at least annually.</p>	<p>Business Continuity Management Policy and</p>

BCR-01		Management Policy and Procedures
BCR-02	Determine the impact of business disruptions and risks to establish criteria for developing business continuity and operational resilience strategies and capabilities.	Risk Assessment and Impact Analysis
BCR-03	Establish strategies to reduce the impact of, withstand, and recover from business disruptions within risk appetite.	Business Continuity Strategy
BCR-04	Establish, document, approve, communicate, apply, evaluate and maintain a business continuity plan based on the results of the operational resilience strategies and capabilities.	Business Continuity Planning
	Develop, identify, and acquire documentation that is relevant to support the business continuity and operational resilience programs. Make the documentation available to authorized stakeholders and review periodically.	

BCR-05		Documentation
BCR-06	Exercise and test business continuity and operational resilience plans at least annually or upon significant changes.	Business Continuity Exercises
BCR-07	Establish communication with stakeholders and participants in the course of business continuity and resilience procedures.	Communication
BCR-08	Periodically backup data stored in the cloud. Ensure the confidentiality, integrity and availability of the backup, and verify data restoration from backup for resiliency.	Backup

BCR-09	<p>Establish, document, approve, communicate, apply, evaluate and maintain a disaster response plan to recover from natural and man-made disasters.</p> <p>Update the plan at least annually or upon significant changes.</p>	Disaster Response Plan
BCR-10	<p>Exercise the disaster response plan annually or upon significant changes, including if possible local emergency authorities.</p>	Response Plan Exercise

BCR-11	<p>Supplement business-critical equipment with redundant equipment independently located at a reasonable minimum distance in accordance with applicable industry standards.</p>	Equipment Redundancy
CCC-01	<p>Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for managing the risks associated with applying changes to organization assets, including application, systems, infrastructure, configuration, etc., regardless of whether the assets are managed internally or externally (i.e., outsourced). Review and update the policies and procedures at least annually.</p>	Change Management Policy and Procedures
CCC-02	<p>Follow a defined quality change control, approval and testing process with established baselines, testing, and release standards.</p>	Quality Testing

CCC-03	Manage the risks associated with applying changes to organization assets, including application, systems, infrastructure, configuration, etc., regardless of whether the assets are managed internally or externally (i.e., outsourced).	Change Management Technology
CCC-04	Restrict the unauthorized addition, removal, update, and management of organization assets.	Unauthorized Change Protection
CCC-05	Include provisions limiting changes directly impacting CSCs owned environments/tenants to explicitly authorized requests within service level agreements between CSPs and CSCs.	Change Agreements
CCC-06	Establish change management baselines for all relevant authorized changes on organization assets.	Change Management Baseline
CCC-07	Implement detection measures with proactive notification in case of changes deviating from the established baseline.	Detection of Baseline Deviation

CCC-08	'Implement a procedure for the management of exceptions, including emergencies, in the change and configuration process. Align the procedure with the requirements of GRC-04: Policy Exception Process.'	Exception Management
CCC-09	Define and implement a process to proactively roll back changes to a previous known good state in case of errors or security concerns.	Change Restoration
CEK-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for Cryptography, Encryption and Key Management. Review and update the policies and procedures at least annually.	Encryption and Key Management Policy and Procedures
CEK-02	Define and implement cryptographic, encryption and key management roles and responsibilities.	CEK Roles and Responsibilities

CEK-03	Provide cryptographic protection to data at-rest and in-transit, using cryptographic libraries certified to approved standards.	Data Encryption
CEK-04	Use encryption algorithms that are appropriate for data protection, considering the classification of data, associated risks, and usability of the encryption technology.	Encryption Algorithm
CEK-05	Establish a standard change management procedure, to accommodate changes from internal and external sources, for review, approval, implementation and communication of cryptographic, encryption and key management technology	Encryption Change Management
CEK-06	Manage and adopt changes to cryptography-, encryption-, and key management-related systems (including policies and procedures) that fully account for downstream effects of proposed changes, including residual risk, cost, and benefits analysis.	Encryption Change Cost Benefit Analysis
CEK-07	Establish and maintain an encryption and key management risk program that includes provisions for risk assessment, risk treatment, risk context, monitoring, and feedback.	Encryption Risk Management

CEK-08	CSPs must provide the capability for CSCs to manage their own data encryption keys.	CSC Key Management Capability
CEK-09	Audit encryption and key management systems, policies, and processes with a frequency that is proportional to the risk exposure of the system with audit occurring preferably continuously but at least annually and after any security event(s).	Encryption and Key Management Audit
CEK-10	Generate Cryptographic keys using industry accepted cryptographic libraries specifying the algorithm strength and the random number generator used.	Key Generation
CEK-11	Manage cryptographic secret and private keys that are provisioned for a unique purpose.	Key Purpose

CEK-12	Rotate cryptographic keys in accordance with the calculated cryptoperiod, which includes provisions for considering the risk of information disclosure and legal and regulatory requirements.	Key Rotation
CEK-13	Define, implement and evaluate processes, procedures and technical measures to revoke and remove cryptographic keys prior to the end of its established cryptoperiod, when a key is compromised, or an entity is no longer part of the organization, which include provisions for legal and regulatory	Key Revocation
CEK-14	Define, implement and evaluate processes, procedures and technical measures to destroy keys stored outside a secure environment and revoke keys stored in Hardware Security Modules (HSMs) when they are no longer needed, which include provisions for legal and regulatory requirements.	Key Destruction
CEK-15	Define, implement and evaluate processes, procedures and technical measures to create keys in a pre-activated state when they have been generated but not authorized for use, which include provisions for legal and regulatory requirements.	Key Activation

CEK-16	Define, implement and evaluate processes, procedures and technical measures to monitor, review and approve key transitions from any state to/from suspension, which include provisions for legal and regulatory requirements.	Key Suspension
CEK-17	Define, implement and evaluate processes, procedures and technical measures to deactivate keys at the time of their expiration date, which include provisions for legal and regulatory requirements.	Key Deactivation
CEK-18	Define, implement and evaluate processes, procedures and technical measures to manage archived keys in a secure repository requiring least privilege access, which include provisions for legal and regulatory requirements.	Key Archival
CEK-19	Define, implement and evaluate processes, procedures and technical measures to use compromised keys to encrypt information only in controlled circumstance, and thereafter exclusively for decrypting data and never for encrypting data, which include provisions for legal and regulatory requirements.	Key Compromise

CEK-20	Define, implement and evaluate processes, procedures and technical measures to assess the risk to operational continuity versus the risk of the keying material and the information it protects being exposed if control of the keying material is lost, which include provisions for legal and regulatory requirements.	Key Recovery
CEK-21	Define, implement and evaluate processes, procedures and technical measures in order for the key management system to track and report all cryptographic materials and changes in status, which include provisions for legal and regulatory requirements.	Key Inventory Management
	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for the secure disposal of equipment used outside the organization's premises. If the equipment is not physically destroyed a data destruction procedure that renders recovery of information impossible must be	

DCS-01	applied. Review and update the policies and procedures at least annually.	Off-Site Equipment Disposal Policy and Procedures
DCS-02	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for the relocation or transfer of hardware, software, or data/information to an offsite or alternate location. The relocation or transfer request requires the written or cryptographically verifiable authorization. Review and update the policies and procedures at least annually.	Off-Site Transfer Authorization Policy and Procedures

DCS-03	<p>Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for maintaining a safe and secure working environment in offices, rooms, and facilities. Review and update the policies and procedures at least annually.</p>	<p>Secure Area Policy and Procedures</p>
DCS-04	<p>Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for the secure transportation of physical media. Review and update the policies and procedures at least annually.</p>	<p>Secure Media Transportation</p>

DCS-04		Policy and Procedures
DCS-05	Classify and document the physical, and logical assets (e.g., applications) based on the organizational business risk.	Assets Classification
DCS-06	Catalogue and track all relevant physical and logical assets located at all of the CSP's sites within a secured system.	Assets Cataloguing and Tracking
DCS-07	Implement physical security perimeters to safeguard personnel, data, and information systems. Establish physical security perimeters between the administrative and business areas and the data storage and processing facilities areas.	Controlled Access Points
DCS-08	Use equipment identification as a method for connection authentication.	Equipment Identification

DCS-09	Allow only authorized personnel access to secure areas, with all ingress and egress points restricted, documented, and monitored by physical access control mechanisms. Retain access control records on a periodic basis as deemed appropriate by the organization.	Secure Area Authorization
DCS-10	Implement, maintain, and operate datacenter surveillance systems at the external perimeter and at all the ingress and egress points to detect unauthorized ingress and egress attempts.	Surveillance System
DCS-11	Train datacenter personnel to respond to unauthorized ingress or egress attempts.	Unauthorized Access Response Training
DCS-12	Define, implement and evaluate processes, procedures and technical measures that ensure a risk-based protection of power and telecommunication cables from a threat of interception, interference or damage at all facilities, offices and rooms.	Cabling Security

DCS-13	Implement and maintain data center environmental control systems that monitor, maintain and test for continual effectiveness the temperature and humidity conditions within accepted industry standards.	Environmental Systems
DCS-14	Secure, monitor, maintain, and test utilities services for continual effectiveness at planned intervals.	Secure Utilities
DCS-15	Keep business-critical equipment away from locations subject to high probability for environmental risk events.	Equipment Location
DSP-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for the classification, protection and handling of data throughout its lifecycle, and according to all applicable laws and regulations, standards, and risk level. Review and update the policies and procedures at least annually.	Security and Privacy Policy and Procedures

DSP-02	Apply industry accepted methods for the secure disposal of data from storage media such that data is not recoverable by any forensic means.	Secure Disposal
DSP-03	Create and maintain a data inventory, at least for any sensitive data and personal data.	Data Inventory
DSP-04	Classify data according to its type and sensitivity level.	Data Classification
DSP-05	Create data flow documentation to identify what data is processed, stored or transmitted where. Review data flow documentation at defined intervals, at least annually, and after any change.	Data Flow Documentation
DSP-06	Document ownership and stewardship of all relevant documented personal and sensitive data. Perform review at least annually.	Data Ownership and

DSP-06		Stewardship
DSP-07	Develop systems, products, and business practices based upon a principle of security by design and industry best practices.	Data Protection by Design and Default
DSP-08	Develop systems, products, and business practices based upon a principle of privacy by design and industry best practices. Ensure that systems' privacy settings are configured by default, according to all applicable laws and regulations.	Data Privacy by Design and Default
DSP-09	Conduct a Data Protection Impact Assessment (DPIA) to evaluate the origin, nature, particularity and severity of the risks upon the processing of personal data, according to any applicable laws, regulations and industry best practices.	Data Protection Impact Assessment

DSP-10	Define, implement and evaluate processes, procedures and technical measures that ensure any transfer of personal or sensitive data is protected from unauthorized access and only processed within scope as permitted by the respective laws and regulations.	Sensitive Data Transfer
DSP-11	Define and implement, processes, procedures and technical measures to enable data subjects to request access to, modification, or deletion of their personal data, according to any applicable laws and regulations.	Personal Data Access, Reversal, Rectification and Deletion
DSP-12	Define, implement and evaluate processes, procedures and technical measures to ensure that personal data is processed according to any applicable laws and regulations and for the purposes declared to the data subject.	Limitation of Purpose in Personal Data Processing
DSP-13	Define, implement and evaluate processes, procedures and technical measures for the transfer and sub-processing of personal data within the service supply chain, according to any applicable laws and regulations.	Personal Data Sub-processing

DSP-14	Define, implement and evaluate processes, procedures and technical measures to disclose the details of any personal or sensitive data access by sub-processors to the data owner prior to initiation of that processing.	Disclosure of Data Sub-processors
DSP-15	Obtain authorization from data owners, and manage associated risk before replicating or using production data in non-production environments.	Limitation of Production Data Use
DSP-16	Data retention, archiving and deletion is managed in accordance with business requirements, applicable laws and regulations.	Data Retention and Deletion
DSP-17	Define and implement, processes, procedures and technical measures to protect sensitive data throughout it's lifecycle.	Sensitive Data Protection
DSP-18	The CSP must have in place, and describe to CSCs the procedure to manage and respond to requests for disclosure of Personal Data by Law Enforcement Authorities according to applicable laws and regulations. The CSP must give special attention to the notification procedure to interested CSCs, unless otherwise prohibited, such as a prohibition under criminal law to preserve confidentiality of a law enforcement investigation	Disclosure Notification

DSP-18	of a law enforcement investigation.	Disclosure Notification
DSP-19	Define and implement, processes, procedures and technical measures to specify and document the physical locations of data, including any locations in which data is processed or backed up.	Data Location
GRC-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for an information governance program, which is sponsored by the leadership of the organization. Review and update the policies and procedures at least annually.	Governance Program Policy

GRC-01		and Procedures
GRC-02	Establish a formal, documented, and leadership-sponsored Enterprise Risk Management (ERM) program that includes policies and procedures for identification, evaluation, ownership, treatment, and acceptance of cloud security and privacy risks.	Risk Management Program
GRC-03	Review all relevant organizational policies and associated procedures at least annually or when a substantial change occurs within the organization.	Organizational Policy Reviews
GRC-04	Establish and follow an approved exception process as mandated by the governance program whenever a deviation from an established policy occurs.	Policy Exception Process
GRC-05	Develop and implement an Information Security Program, which includes programs for all the relevant domains of the CCM.	Information Security Program

GRC-06	Define and document roles and responsibilities for planning, implementing, operating, assessing, and improving governance programs.	Governance Responsibility Model
GRC-07	Identify and document all relevant standards, regulations, legal/contractual, and statutory requirements, which are applicable to your organization.	Information System Regulatory Mapping
GRC-08	Establish and maintain contact with cloud-related special interest groups and other relevant entities in line with business context.	Special Interest Groups
	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for background verification of all new employees (including but not limited to remote employees, contractors, and third parties) according to local laws, regulations, ethics, and contractual constraints and proportional to the data classification to be accessed, the business requirements, and acceptable	

HRS-01	<p>acceptable risk. Review and update the policies and procedures at least annually.</p>	<p>Background Screening Policy and Procedures</p>
HRS-02	<p>Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for defining allowances and conditions for the acceptable use of organizationally-owned or managed assets. Review and update the policies and procedures at least annually.</p>	<p>Acceptable Use of Technology Policy and</p>

HRS-02		Technology Policy and Procedures
HRS-03	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures that require unattended workspaces to not have openly visible confidential data. Review and update the policies and procedures at least annually.	Clean Desk Policy and Procedures
HRS-04	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures to protect information accessed, processed or stored at remote sites and locations. Review and update the policies and procedures	Remote and Home Working

	at least annually.	Policy and Procedures
HRS-05	Establish and document procedures for the return of organization-owned assets by terminated employees.	Asset returns
HRS-06	Establish, document, and communicate to all personnel the procedures outlining the roles and responsibilities concerning changes in employment.	Employment Termination
HRS-07	Employees sign the employee agreement prior to being granted access to organizational information systems, resources and assets.	Employment Agreement Process
HRS-08	The organization includes within the employment agreements provisions and/or terms for adherence to established information governance and security policies.	Employment Agreement Content
HRS-09	Document and communicate roles and responsibilities of employees, as they relate to information assets and security.	Personnel Roles and Responsibilities

HRS-10	Identify, document, and review, at planned intervals, requirements for non-disclosure/confidentiality agreements reflecting the organization's needs for the protection of data and operational details.	Non-Disclosure Agreements
HRS-11	Establish, document, approve, communicate, apply, evaluate and maintain a security awareness training program for all employees of the organization and provide regular training updates.	Security Awareness Training
HRS-12	Provide all employees with access to sensitive organizational and personal data with appropriate security awareness training and regular updates in organizational procedures, processes, and policies relating to their professional function relative to the organization.	Personal and Sensitive Data Awareness and Training

HRS-13	<p>Make employees aware of their roles and responsibilities for maintaining awareness and compliance with established policies and procedures and applicable legal, statutory, or regulatory compliance obligations.</p>	<p>Compliance User Responsibility</p>
IAM-01	<p>Establish, document, approve, communicate, implement, apply, evaluate and maintain policies and procedures for identity and access management. Review and update the policies and procedures at least annually.</p>	<p>Identity and Access Management Policy and Procedures</p>
IAM-02	<p>Establish, document, approve, communicate, implement, apply, evaluate and maintain strong password policies and procedures. Review and update the policies and procedures at least annually.</p>	<p>Strong Password Policy and Procedures</p>

IAM-03	Manage, store, and review the information of system identities, and level of access.	Identity Inventory
IAM-04	Employ the separation of duties principle when implementing information system access.	Separation of Duties
IAM-05	Employ the least privilege principle when implementing information system access.	Least Privilege
IAM-06	Define and implement a user access provisioning process which authorizes, records, and communicates access changes to data and assets.	User Access Provisioning
IAM-07	De-provision or respectively modify access of movers / leavers or system identity changes in a timely manner in order to effectively adopt and communicate identity and access management policies.	User Access Changes and Revocation
IAM-08	Review and revalidate user access for least privilege and separation of duties with a frequency that is commensurate with organizational risk tolerance.	User Access Review

IAM-09	Define, implement and evaluate processes, procedures and technical measures for the segregation of privileged access roles such that administrative access to data, encryption and key management capabilities and logging capabilities are distinct and separated.	Segregation of Privileged Access Roles
IAM-10	Define and implement an access process to ensure privileged access roles and rights are granted for a time limited period, and implement procedures to prevent the culmination of segregated privileged access.	Management of Privileged Access Roles
IAM-11	Define, implement and evaluate processes and procedures for customers to participate, where applicable, in the granting of access for agreed, high risk (as defined by the organizational risk assessment) privileged access roles.	CSCs Approval for Agreed Privileged Access Roles
IAM-12	Define, implement and evaluate processes, procedures and technical measures to ensure the logging infrastructure is read-only for all with write access, including privileged access roles, and that the ability to disable it is controlled through a procedure that ensures the segregation of duties and break glass procedures.	Safeguard Log Integrity

IAM-12		Safeguard Logs Integrity
IAM-13	Define, implement and evaluate processes, procedures and technical measures that ensure users are identifiable through unique IDs or which can associate individuals to the usage of user IDs.	Uniquely Identifiable Users
IAM-14	Define, implement and evaluate processes, procedures and technical measures for authenticating access to systems, application and data assets, including multifactor authentication for at least privileged user and sensitive data access. Adopt digital certificates or alternatives which achieve an equivalent level of security for system identities.	Strong Authentication

IAM-15	Define, implement and evaluate processes, procedures and technical measures for the secure management of passwords.	Passwords Management
IAM-16	Define, implement and evaluate processes, procedures and technical measures to verify access to data and system functions is authorized.	Authorization Mechanisms
	<p>Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for interoperability and portability including requirements for:</p> <ul style="list-style-type: none">a. Communications between application interfacesb. Information processing interoperabilityc. Application development portabilityd. Information/Data exchange, usage, portability, integrity, and persistence <p>Review and update the policies and procedures at least annually.</p>	

IPY-01

Interoperability and
Portability Policy and
Procedures

IPY-02	Provide application interface(s) to CSCs so that they programmatically retrieve their data to enable interoperability and portability.	Application Interface Availability
IPY-03	Implement cryptographically secure and standardized network protocols for the management, import and export of data.	Secure Interoperability and Portability Management
IPY-04	<p>Agreements must include provisions specifying CSCs access to data upon contract termination and will include:</p> <ul style="list-style-type: none"> a. Data format b. Length of time the data will be stored c. Scope of the data retained and made available to the CSCs d. Data deletion policy 	Data Portability Contractual Obligations
IVS-01	<p>Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for infrastructure and virtualization security.</p> <p>Review and update the policies and procedures at least annually.</p>	Infrastructure and Virtualization Security Policy and Procedures

IVS-02	Plan and monitor the availability, quality, and adequate capacity of resources in order to deliver the required system performance as determined by the business.	Capacity and Resource Planning
IVS-03	Monitor, encrypt and restrict communications between environments to only authenticated and authorized connections, as justified by the business. Review these configurations at least annually, and support them by a documented justification of all allowed services, protocols, ports, and compensating controls.	Network Security

IVS-04	Harden host and guest OS, hypervisor or infrastructure control plane according to their respective best practices, and supported by technical controls, as part of a security baseline.	OS Hardening and Base Controls
IVS-05	Separate production and non-production environments.	Production and Non-Production Environments

IVS-06	Design, develop, deploy and configure applications and infrastructures such that CSP and CSC (tenant) user access and intra-tenant access is appropriately segmented and segregated, monitored and restricted from other tenants.	Segmentation and Segregation
IVS-07	Use secure and encrypted communication channels when migrating servers, services, applications, or data to cloud environments. Such channels must include only up-to-date and approved protocols.	Migration to Cloud Environments
IVS-08	Identify and document high-risk environments.	Network Architecture Documentation
IVS-09	Define, implement and evaluate processes, procedures and defense-in-depth techniques for protection, detection, and timely response to network-based attacks.	Network Defense
LOG-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for logging and monitoring. Review and update the policies and procedures at least annually.	Logging and Monitoring

LOG-01		Policy and Procedures
LOG-02	Define, implement and evaluate processes, procedures and technical measures to ensure the security and retention of audit logs.	Audit Logs Protection
LOG-03	Identify and monitor security-related events within applications and the underlying infrastructure. Define and implement a system to generate alerts to responsible stakeholders based on such events and corresponding metrics.	Security Monitoring and Alerting
LOG-04	Restrict audit logs access to authorized personnel and maintain records that provide unique access accountability.	Audit Logs Access and Accountability

LOG-05	Monitor security audit logs to detect activity outside of typical or expected patterns. Establish and follow a defined process to review and take appropriate and timely actions on detected anomalies.	Audit Logs Monitoring and Response
LOG-06	Use a reliable time source across all relevant information processing systems.	Clock Synchronization
LOG-07	Establish, document and implement which information meta/data system events should be logged. Review and update the scope at least annually or whenever there is a change in the threat environment.	Logging Scope

LOG-08	Generate audit records containing relevant security information.	Log Records
LOG-09	The information system protects audit records from unauthorized access, modification, and deletion.	Log Protection
LOG-10	Establish and maintain a monitoring and internal reporting capability over the operations of cryptographic, encryption and key management policies, processes, procedures, and controls.	Encryption Monitoring and Reporting
LOG-11	Log and monitor key lifecycle management events to enable auditing and reporting on usage of cryptographic keys.	Transaction/Activity Logging
LOG-12	Monitor and log physical access using an auditable access control system.	Access Control Logs
LOG-13	Define, implement and evaluate processes, procedures and technical measures for the reporting of anomalies and failures of the monitoring system and provide immediate notification to the accountable party.	Failures and Anomalies

LOG-13		Reporting
SEF-01	<p>Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for Security Incident Management, E-Discovery, and Cloud Forensics. Review and update the policies and procedures at least annually.</p>	<p>Security Incident Management Policy and Procedures</p>
SEF-02	<p>Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for the timely management of security incidents. Review and update the policies and procedures at least annually.</p>	<p>Service Management Policy and Procedures</p>

SEF-03	'Establish, document, approve, communicate, apply, evaluate and maintain a security incident response plan, which includes but is not limited to: relevant internal departments, impacted CSCs, and other business critical relationships (such as supply-chain) that may be impacted.'	Incident Response Plans
SEF-04	Test and update as necessary incident response plans at planned intervals or upon significant organizational or environmental changes for effectiveness.	Incident Response Testing
SEF-05	Establish and monitor information security incident metrics.	Incident Response Metrics
SEF-06	Define, implement and evaluate processes, procedures and technical measures supporting business processes to triage security-related events.	Event Triage Processes
SEF-07	Define and implement, processes, procedures and technical measures for security breach notifications. Report security breaches and assumed security breaches including any relevant supply chain breaches, as per applicable SLAs,	Security Breach Notification

SEF-07	laws and regulations.	Security Breach Notification
SEF-08	Maintain points of contact for applicable regulation authorities, national and local law enforcement, and other legal jurisdictional authorities.	Points of Contact Maintenance
STA-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for the application of the Shared Security Responsibility Model (SSRM) within the organization. Review and update the policies and procedures at least annually.	SSRM Policy and Procedures

STA-02	Apply, document, implement and manage the SSRM throughout the supply chain for the cloud service offering.	SSRM Supply Chain
STA-03	Provide SSRM Guidance to the CSC detailing information about the SSRM applicability throughout the supply chain.	SSRM Guidance
STA-04	Delineate the shared ownership and applicability of all CSA CCM controls according to the SSRM for the cloud service offering.	SSRM Control Ownership
STA-05	Review and validate SSRM documentation for all cloud services offerings the organization uses.	SSRM Documentation Review
STA-06	Implement, operate, and audit or assess the portions of the SSRM which the organization is responsible for.	SSRM Control Implementation
STA-07	Develop and maintain an inventory of all supply chain relationships.	Supply Chain Inventory
STA-08	CSPs periodically review risk factors associated with all organizations within their supply chain.	Supply Chain Risk Management

STA-09	<p>Service agreements between CSPs and CSCs (tenants) must incorporate at least the following mutually-agreed upon provisions and/or terms:</p> <ul style="list-style-type: none"> • Scope, characteristics and location of business relationship and services offered • Information security requirements (including SSRM) • Change management process • Logging and monitoring capability • Incident management and communication procedures • Right to audit and third party assessment • Service termination • Interoperability and portability requirements • Data privacy 	Primary Service and Contractual Agreement
STA-10	Review supply chain agreements between CSPs and CSCs at least annually.	Supply Chain Agreement Review
STA-11	Define and implement a process for conducting internal assessments to confirm conformance and effectiveness of standards, policies, procedures, and service level agreement activities at least annually.	Internal Compliance Testing
STA-12	Implement policies requiring all CSPs throughout the supply chain to comply with information security, confidentiality, access control, privacy, audit, personnel policy and service level requirements and standards.	Supply Chain Service Agreement Compliance

STA-13	Periodically review the organization's supply chain partners' IT governance policies and procedures.	Supply Chain Governance Review
STA-14	Define and implement a process for conducting security assessments periodically for all organizations within the supply chain.	Supply Chain Data Security Assessment
TVM-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures to identify, report and prioritize the remediation of vulnerabilities, in order to protect systems against vulnerability exploitation. Review and update the policies and procedures at least annually.	Threat and Vulnerability Management Policy and Procedures
TVM-02	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures to protect against malware on managed assets. Review and update the policies and procedures at least annually.	Malware Protection Policy and Procedures

TVM-03	Define, implement and evaluate processes, procedures and technical measures to enable both scheduled and emergency responses to vulnerability identifications, based on the identified risk.	Vulnerability Remediation Schedule
TVM-04	Define, implement and evaluate processes, procedures and technical measures to update detection tools, threat signatures, and indicators of compromise on a weekly, or more frequent basis.	Detection Updates
TVM-05	Define, implement and evaluate processes, procedures and technical measures to identify updates for applications which use third party or open source libraries according to the organization's vulnerability management policy.	External Library Vulnerabilities
TVM-06	Define, implement and evaluate processes, procedures and technical measures for the periodic performance of penetration testing by independent third parties.	Penetration Testing
TVM-07	Define, implement and evaluate processes, procedures and technical measures for the detection of vulnerabilities on organizationally managed assets at least monthly.	Vulnerability Identification

TVM-08	Use a risk-based model for effective prioritization of vulnerability remediation using an industry recognized framework.	Vulnerability Prioritization
TVM-09	Define and implement a process for tracking and reporting vulnerability identification and remediation activities that includes stakeholder notification.	Vulnerability Management Reporting
TVM-10	Establish, monitor and report metrics for vulnerability identification and remediation at defined intervals.	Vulnerability Management Metrics
UEM-01	Establish, document, approve, communicate, apply, evaluate and maintain policies and procedures for all endpoints. Review and update the policies and procedures at least annually.	Endpoint Devices Policy and Procedures
UEM-02	Define, document, apply and evaluate a list of approved services, applications and sources of applications (stores) acceptable for use by endpoints when accessing or storing organization-managed data.	Application and Service Approval

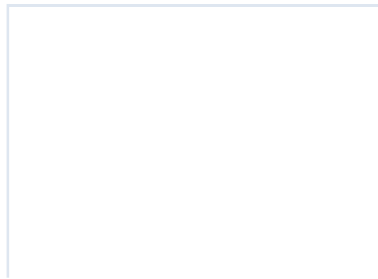
UEM-03	Define and implement a process for the validation of the endpoint device's compatibility with operating systems and applications.	Compatibility
UEM-04	Maintain an inventory of all endpoints used to store and access company data.	Endpoint Inventory
UEM-05	Define, implement and evaluate processes, procedures and technical measures to enforce policies and controls for all endpoints permitted to access systems and/or store, transmit, or process organizational data.	Endpoint Management
UEM-06	Configure all relevant interactive-use endpoints to require an automatic lock screen.	Automatic Lock Screen
UEM-07	Manage changes to endpoint operating systems, patch levels, and/or applications through the company's change management processes.	Operating Systems
UEM-08	Protect information from unauthorized disclosure on managed endpoint devices with storage encryption.	Storage Encryption

UEM-09	Configure managed endpoints with anti-malware detection and prevention technology and services.	Anti-Malware Detection and Prevention
UEM-10	Configure managed endpoints with properly configured software firewalls.	Software Firewall
UEM-11	Configure managed endpoints with Data Loss Prevention (DLP) technologies and rules in accordance with a risk assessment.	Data Loss Prevention
UEM-12	Enable remote geo-location capabilities for all managed mobile endpoints.	Remote Locate
UEM-13	Define, implement and evaluate processes, procedures and technical measures to enable the deletion of company data remotely on managed endpoint devices.	Remote Wipe
UEM-14	Define, implement and evaluate processes, procedures and technical and/or contractual measures to maintain proper security of third-party endpoints with access to organizational assets.	Third-Party Endpoint Security Posture



CCM Domain Title

Audit & Assurance



Application & Interface
Security

Business Continuity
Management and
Operational Resilience

Change Control and
Configuration Management

Cryptography, Encryption &
Key Management

Datacenter Security

Data Security and Privacy

Lifecycle Management

Governance, Risk and
Compliance

Human Resources

Identity & Access
Management

Interoperability & Portability

Infrastructure &
Virtualization Security

Logging and Monitoring

Security Incident
Management, E-Discovery, &
Cloud Forensics

Supply Chain Management,
Transparency, and
Accountability

Threat & Vulnerability
Management

Universal Endpoint
Management

