CAIQv3.1 CONSENSUS ASSESSMENTS INITIATIVE QUESTIONNAIRE v3.1

Control Domain	Control ID	Question ID	Control Specification	Consensus Assessment Questions	Consensus Assessment Answers			Notes
					Yes	No	Not applicable	
Application & Interface Security *Application Security*	AIS-01	AIS-01.1	Applications and programming interfaces (APIs) shall be designed, developed, deployed, and tested in accordance with leading industry standards (e.g., OWASP for web applications) and adhere to applicable legal, statutory, or regulatory compliance obligations.	Do you use industry standards (i.e. OWASP Software Assurance Maturity Model, ISO 27034) to build in security for your Systems/Software Development Lifecycle (SDLC)?	X			
		AIS-01.2		Do you use an automated source code analysis tool to detect security defects in code prior to production?	X			
		AIS-01.3		Do you use manual source-code analysis to detect security defects in code prior to production?	X			
		AIS-01.4		Do you verify that all of your software suppliers adhere to industry standards for Systems/Software Development Lifecycle (SDLC) security?			X	Sviluppo interno
		AIS-01.5		(SaaS only) Do you review your applications for security vulnerabilities and address any issues prior to deployment to production?	X			
Application & Interface Security *Customer Access Requirements*	AIS-02	AIS-02.1	Prior to granting customers access to data, assets, and information systems, identified security, contractual, and regulatory requirements for customer access shall	Are all identified security, contractual, and regulatory requirements for customer access contractually addressed and remediated prior to granting customers access to data, assets, and information systems?	X			
		AIS- 02.2		Are all requirements and trust levels for customers' access defined and documented?	X			
Application & Interface Security *Data Integrity*	AIS-03	AIS-03.1	Data input and output integrity routines (i.e., reconciliation and edit checks) shall be implemented for application interfaces and databases to prevent manual or systematic processing errors,	Does your data management policies and procedures require audits to verify data input and output integrity routines?	X			
		AIS-03.2		Are data input and output integrity routines (i.e. MD5/SHA checksums) implemented for application interfaces and databases to prevent manual or systematic processing errors or corruption of data?	X			
Application & Interface Security *Data Security / Integrity*	AIS-04	AIS-04.1	Policies and procedures shall be established and maintained in support of data security to include (confidentiality, integrity, and availability) across multiple system interfaces, jurisdictions, and business functions to prevent improper disclosure, alternation, or destruction.	Is your Data Security Architecture designed using an industry standard (e.g., CDSA, MULITSAFE, CSA Trusted Cloud Architectural Standard, FedRAMP, CAESARS)?	X			
Audit Assurance & Compliance *Audit Planning*	AAC-01	AAC-01.1	Audit plans shall be developed and maintained to address business process disruptions. Auditing plans shall focus on reviewing the effectiveness of the implementation of	Do you develop and maintain an agreed upon audit plan (e.g., scope, objective, frequency, resources,etc.) for reviewing the efficiency and effectiveness of implemented security controls?	X			
		AAC-01.2		Does your audit program take into account effectiveness of implementation of security operations?	X			
Audit Assurance & Compliance *Independent Audits*	AAC-02	AAC-02.1	Independent reviews and assessments shall be performed at least annually to ensure that the organization addresses	Do you allow tenants to view your SOC2/ISO 27001 or similar third-party audit or certification reports?		X		

		AAC-02.2	nonconformities of established policies, standards, procedures, and compliance obligations.	Do you conduct network penetration tests of your cloud service infrastructure at least annually?	X			
		AAC-02.3		Do you conduct application penetration tests of your cloud infrastructure regularly as prescribed by industry best practices and guidance?	X			
		AAC-02.4		Do you conduct internal audits at least annually?	X			
		AAC-02.5		Do you conduct independent audits at least annually?	X			
		AAC-02.6		Are the results of the penetration tests available to tenants at their request?		X		Su richiesta
		AAC-02.7		Are the results of internal and external audits available to tenants at their request?		X		Su richiesta
Audit Assurance & Compliance *Information System Regulatory Mapping*	AAC-03	AAC-03.1	Organizations shall create and maintain a control framework which captures standards, regulatory, legal, and statutory requirements relevant for their business needs. The control framework shall be reviewed at least annually to ensure changes that could affect the business processes are reflected.	Do you have a program in place that includes the ability to monitor changes to the regulatory requirements in relevant jurisdictions, adjust your security program for changes to legal requirements, and ensure compliance with relevant regulatory requirements?	X			Periodicamente
Business Continuity Management & Operational Resilience *Business Continuity Planning*	BCR-01	BCR-01.1	A consistent unified framework for business continuity planning and plan development shall be established, documented, and adopted to ensure all business continuity plans are consistent in addressing priorities for testing, maintenance, and information security requirements. Requirements for business continuity plans include the following: • Defined purpose and scope, aligned with relevant dependencies	Does your organization have a plan or framework for business continuity management or disaster recovery management?	X			
		BCR-01.2		Do you have more than one provider for each service you depend on?		X		
		BCR-01.3		Do you provide a disaster recovery capability?	X			
		BCR-01.4		Do you monitor service continuity with upstream providers in the event of provider failure?	X			
		BCR-01.5		Do you provide access to operational redundancy reports, including the services you rely on?		X		
		BCR-01.6		Do you provide a tenant-triggered failover option?		X		
		BCR-01.7		Do you share your business continuity and redundancy plans with your tenants?		X		Su richiesta
Business Continuity Management & Operational Resilience *Business Continuity Testing*	BCR-02	BCR-02.1	Business continuity and security incident response plans shall be subject to testing at planned intervals or upon significant organizational or environmental changes. Incident response plans shall involve impacted customers (tenant) and other business relationships that represent critical intra-supply chain business process dependencies.	Are business continuity plans subject to testing at planned intervals or upon significant organizational or environmental changes to ensure continuing effectiveness?	X			
Business Continuity Management & Operational Resilience *Power / Telecommunications*	BCR-03	BCR-03.1	Data center utilities services and environmental conditions (e.g., water, power, temperature and humidity controls, telecommunications, and internet connectivity) shall be secured,	Does your organization adhere to any international or industry standards when it comes to securing, monitoring, maintaining and testing of datacenter utilities services and environmental conditions?			X	SaaS ospitato su infrastruttura cloud di in CSP qualificato
		BCR-03.2		Has your organization implemented environmental controls, fail-over mechanisms or other redundancies to secure utility services and mitigate environmental conditions?			X	SaaS ospitato su infrastruttura cloud di in CSP qualificato

Business Continuity Management & Operational Resilience Documentation	BCR-04	BCR-04.1	Information system documentation (e.g., administrator and user guides, and architecture diagrams) shall be made available to authorized personnel to ensure the following: • Configuring, installing, and operating the information system • Effectively using the system's security features	Are information system documents (e.g., administrator and user guides, architecture diagrams, etc.) made available to authorized personnel to ensure configuration, installation and operation of the information system?	X			
Business Continuity Management & Operational Resilience *Environmental Risks*	BCR-05	BCR-05.1	Physical protection against damage from natural causes and disasters, as well as deliberate attacks, including fire, flood, atmospheric electrical discharge, solar induced geomagnetic storm, wind, earthquake, tsunami, explosion, nuclear accident, volcanic activity, biological hazard, civil unrest, mudslide, tectonic activity, and other forms of natural or man-made disaster shall be anticipated, designed, and have countermeasures applied.	Is physical damage anticipated and are countermeasures included in the design of physical protections?			X	SaaS ospitato su infrastruttura cloud di in CSP qualificato
Business Continuity Management & Operational Resilience *Equipment Location*	BCR-06	BCR-06.1	To reduce the risks from environmental threats, hazards, and opportunities for unauthorized access, equipment shall be kept away from locations subject to high probability environmental risks and supplemented by redundant equipment located at a reasonable distance.	Are any of your data centers located in places that have a high probability/occurrence of high-impact environmental risks (floods, tornadoes, earthquakes, hurricanes, etc.)?			X	SaaS ospitato su infrastruttura cloud di in CSP qualificato
Business Continuity Management & Operational Resilience *Equipment Maintenance*	BCR-07	BCR-07.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, for equipment maintenance ensuring continuity and availability of operations and support personnel.	Do you have documented policies, procedures and supporting business processes for equipment and datacenter maintenance?			X	SaaS ospitato su infrastruttura cloud di in CSP qualificato
		BCR-07.2		Do you have an equipment and datacenter maintenance routine or plan?			X	SaaS ospitato su infrastruttura cloud di in CSP qualificato
Business Continuity Management & Operational Resilience *Equipment Power Failures*	BCR-08	BCR-08.1	Protection measures shall be put into place to react to natural and man-made threats based upon a geographically-specific business impact assessment.	Are security mechanisms and redundancies implemented to protect equipment from utility service outages (e.g., power failures, network disruptions, etc.)?			X	SaaS ospitato su infrastruttura cloud di in CSP qualificato

Business Continuity Management & Operational Resilience *Impact Analysis*	BCR-09	BCR-09.1	There shall be a defined and documented method for determining the impact of any disruption to the organization (cloud provider, cloud consumer) that must incorporate the following: • Identify critical products and services • Identify all dependencies, including processes, applications, business partners, and	Do you use industry standards and frameworks to determine the impact of any disruption to your organization (i.e. criticality of services and recovery priorities, disruption tolerance, RPO and RTO etc) ?	X			
		BCR-09.2		Does your organization conduct impact analysis pertaining to possible disruptions to the cloud service?	X			
Business Continuity Management & Operational Resilience *Policy*	BCR-10	BCR-10.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, for appropriate IT governance and service management to ensure appropriate planning, delivery and support of the organization's IT capabilities supporting business functions, workforce, and/or customers based on industry acceptable standards (i.e., ITIL v4 and COBIT 5). Additionally, policies and procedures shall include defined roles and responsibilities supported by regular workforce training.	Are policies and procedures established and made available for all personnel to adequately support services operations' roles?	X			
Business Continuity Management & Operational Resilience *Retention Policy*	BCR-11	BCR-11.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, for defining and adhering to the retention period of any critical asset as per established policies and procedures, as well as applicable legal, statutory, or regulatory compliance	Do you have technical capabilities to enforce tenant data retention policies?	X			
		BCR-11.2		Do you have documented policies and procedures demonstrating adherence to data retention periods as per legal, statutory or regulatory compliance requirements?	X			
		BCR-11.3		Have you implemented backup or recovery mechanisms to ensure compliance with regulatory, statutory, contractual or business requirements?	X			
		BCR-11.4		If using virtual infrastructure, does your cloud solution include independent hardware restore and recovery capabilities?			X	SaaS ospitato su infrastruttura cloud di in CSP qualificato
		BCR-11.5		If using virtual infrastructure, do you provide tenants with a capability to restore a virtual machine to a previous configuration?		X		SaaS ospitato su infrastruttura cloud di in CSP qualificato
		BCR-11.6		Does your cloud solution include software/provider independent restore and recovery capabilities?	X			
		BCR-11.7		Do you test your backup or redundancy mechanisms at least annually?	X			
Change Control & Configuration Management *New Development / Acquisition*	CCC-01	CCC-01.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to ensure the development and/or acquisition of new data, physical or virtual applications, infrastructure network and systems components, or any corporate, operations and/or data center facilities have been pre-authorized by the organization's business leadership or other accountable business role or function.	Are policies and procedures established for management authorization for development or acquisition of new applications, systems, databases, infrastructure, services, operations and facilities?	X			
Change Control & Configuration Management	CCC-02	CCC-02.1	External business partners shall adhere to the same policies and procedures	Are policies and procedures for change management, release, and testing adequately communicated to external business partners?	X			
		CCC-02.2		Are policies and procedures adequately enforced to ensure external business partners comply with change management requirements?	X			

Change Control & Configuration *Management Quality Testing*	CCC-03	CCC-03.1	Organizations shall follow a defined quality change control and testing process (e.g., ITIL Service Management) with established baselines, testing, and release standards which focus on system availability, confidentiality, and integrity of systems and services.	Do you have a defined quality change control and testing process in place based on system availability, confidentiality, and integrity?	X			
		CCC-03.2		Is documentation describing known issues with certain products/services available?	X			
		CCC-03.3		Are there policies and procedures in place to triage and remedy reported bugs and security vulnerabilities for product and service offerings?	X			
		CCC-03.4		Do you have controls in place to ensure that standards of quality are being met for all software development?	X			
		CCC-03.5		Do you have controls in place to detect source code security defects for any outsourced software development activities?	X			
		CCC-03.6		Are mechanisms in place to ensure that all debugging and test code elements are removed from released software versions?	X			
Change Control & Configuration Management *Unauthorized Software Installations*	CCC-04	CCC-04.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to restrict the installation of unauthorized software on organizationally-owned or managed user end-point devices (e.g., issued workstations, laptops, and mobile devices) and IT infrastructure network and systems components.	Do you have controls in place to restrict and monitor the installation of unauthorized software onto your systems?	X			
Change Control & Configuration Management *Production Changes*	CCC-05	CCC-05.1	Policies and procedures shall be established for managing the risks associated with applying changes to: • Business-critical or	Do you provide tenants with documentation that describes your production change management procedures and their roles/rights/responsibilities within it?		X		Su richiesta del cliente
		CCC-05.2		Do you have policies and procedures established for managing risks with respect to change management in production environments?	X			
		CCC-0.5.3		Do you have technical *measures* in place to ensure that changes in production environments are registered, authorized and in adherence with existing SLAs?	X			
Data Security & Information Lifecycle Management *Classification*	DSI-01	DSI-01.1	Data and objects containing data shall be assigned a classification by the data owner based on	Do you provide a capability to identify data and virtual machines via policy tags/metadata (e.g., tags can be used to limit guest operating systems from booting/instantiating/transporting data in the wrong country)?	X			
		DSI-01.2		Do you provide a capability to identify data and hardware via policy tags/metadata/hardware tags (e.g., TXT/TPM, VN-Tag, etc.)?		X		
Data Security & Information Lifecycle Management *Data Inventory / Flows*	DSI-02	DSI-02.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to inventory, document, and maintain data flows	Do you inventory, document, and maintain data flows for data that is resident (permanent or temporary) within the services' applications and infrastructure network and systems?	X			
		DSI-02.2	for data that is resident (permanently or temporarily) within the	Can you ensure that data does not migrate beyond a defined geographical residency?	X			
Data Security & Information Lifecycle Management E-commerce	DSI-03	DSI-03.1	Data related to electronic commerce (e-commerce) that traverses public networks shall be	Do you provide standardized (e.g. ISO/IEC) non-proprietary encryption algorithms (3DES, AES, etc.) to tenants in order for them to protect their data if it is required to move through public networks (e.g., the Internet)?			X	
		DSI-03.2		Do you utilize open encryption methodologies any time your infrastructure components need to communicate with each other via public networks (e.g., Internet-based replication of data from one environment to another)?			X	
Data Security & Information Lifecycle Management *Handling / Labeling / Security Policy*	DSI-04	DSI-04.1	Policies and procedures shall be established for labeling, handling, and the security of data and objects which contain data. Mechanisms for	Are policies and procedures established for data labeling and handling in order to ensure the security of data and objects that contain data?	X			Si tratta delle gestione dei dati in aderenza al GDPR e a standard di riferimento
		DSI-04.2		Do you follow a structured data-labeling standard (e.g., ISO 15489, Oasis XML Catalog Specification, CSA data type guidance)?		X		
		DSI-04.3		Are mechanisms for label inheritance implemented for objects that act as aggregate containers for data?	X			

Data Security & Information Lifecycle Management *Nonproduction Data*	DSI-05	DSI-05.1	Production data shall not be replicated or used in non-production environments. Any use of customer data in non-production environments requires explicit, documented approval from all customers whose data is affected, and must comply with all legal and regulatory requirements for scrubbing of sensitive data elements.	Do you have procedures in place to ensure production data shall not be replicated or used in non-production environments?	X			
Data Security & Information Lifecycle Management *Ownership / Stewardship*	DSI-06	DSI-06.1	All data shall be designated with stewardship, with assigned responsibilities defined, documented, and communicated.	Are the responsibilities regarding data stewardship defined, assigned, documented, and communicated?	X			
Data Security & Information Lifecycle Management *Secure Disposal*	DSI-07	DSI-07.1	Policies and procedures shall be established with supporting business processes and technical measures implemented for the secure disposal	Do you support the secure deletion (e.g., degaussing/cryptographic wiping) of archived and backed-up data?	X			Cancellazione dei dati al termine del servizio
		DSI-07.2		Can you provide a published procedure for exiting the service arrangement, including assurance to sanitize all computing resources of tenant data once a customer has exited your environment or has vacated a resource?	X			
Datacenter Security *Asset Management*	DCS-01	DCS-01.1	Assets must be classified in terms of business criticality, service-level	Do you classify your assets in terms of business criticality, service-level expectations, and operational continuity requirements?	X			
		DCS-01.2		Do you maintain a complete inventory of all of your critical assets located at all sites/ or geographical locations and their assigned ownership?	X			
Datacenter Security *Controlled Access Points*	DCS-02	DCS-02.1	Physical security perimeters (e.g., fences, walls, barriers, guards, gates, electronic surveillance, physical authentication mechanisms, reception desks, and security patrols) shall be implemented to safeguard sensitive data and information systems.	Are physical security perimeters (e.g., fences, walls, barriers, guards, gates, electronic surveillance, physical authentication mechanisms, reception desks, and security patrols) implemented for all areas housing sensitive data and information systems?			X	SaaS ospitato su infrastruttura cloud di in CSP qualificato
Datacenter Security *Equipment Identification*	DCS-03	DCS-03.1	Automated equipment identification shall be used as a method of	Do you have a capability to use system geographic location as an authentication factor?		X		
		DCS-03.2		Is automated equipment identification used as a method to validate connection authentication integrity based on known equipment location?			X	SaaS ospitato su infrastruttura cloud di in CSP qualificato
Datacenter Security *Offsite Authorization*	DCS-04	DCS-04.1	Authorization must be obtained prior to relocation or transfer of hardware, software, or data to an offsite premises.	Is authorization obtained prior to relocation or transfer of hardware, software, or data to an offsite premises?	X			
Datacenter Security *Offsite Equipment*	DCS-05	DCS-05.1	Policies and procedures shall be established for the secure disposal of equipment (by asset type) used outside the organization's premise. This shall include a wiping solution or destruction process that renders recovery of information impossible. The erasure shall consist of a full write of the drive to ensure that the erased drive is released to inventory for reuse and deployment or securely stored until it can be destroyed.	Can you provide tenants with your asset management policies and procedures?			X	
Datacenter Security *Policy*	DCS-06	DCS-06.1	Policies and procedures shall be established, and	Can you provide evidence that policies, standards, and procedures have been established for maintaining a safe and secure working environment in offices, rooms, facilities, and secure areas?			X	contratto e accordo al trattamento con fornitore infrastruttura

		DCS-06.2	supporting business processes implemented,	Can you provide evidence that your personnel and involved third parties have been trained regarding your documented policies, standards, and procedures?	X			contratto e accordo al trattamento con fornitore infrastruttura
Datacenter Security *Secure Area Authorization*	DCS-07	DCS-07.1	Ingress and egress to secure areas shall be constrained and monitored by physical access control mechanisms to ensure that only authorized personnel are allowed access.	Are physical access control mechanisms (e.g. CCTV cameras, ID cards, checkpoints) in place to secure, constrain and monitor egress and ingress points?	X			SaaS ospitato su infrastruttura cloud di in CSP qualificato
Datacenter Security *Unauthorized Persons Entry*	DCS-08	DCS-08.1	Ingress and egress points such as service areas and other points where unauthorized personnel may enter the premises shall be monitored, controlled and, if possible, isolated from data storage and processing facilities to prevent unauthorized data corruption, compromise, and loss.	Are ingress and egress points, such as service areas and other points where unauthorized personnel may enter the premises, monitored, controlled and isolated from data storage and process?	X			SaaS ospitato su infrastruttura cloud di in CSP qualificato
Datacenter Security *User Access*	DCS-09	DCS-09.1	Physical access to information assets and functions by users and support personnel shall be restricted.	Do you restrict physical access to information assets and functions by users and support personnel?	X			SaaS ospitato su infrastruttura cloud di in CSP qualificato
Encryption & Key Management *Entitlement*	EKM-01	EKM-01.1	Keys must have identifiable owners (binding keys to identities) and there shall be key management policies.	Do you have key management policies binding keys to identifiable owners?		X		
Encryption & Key Management *Key Generation*	EKM-02	EKM-02.1	Policies and procedures shall be established for the management of cryptographic keys in the service's cryptosystem (e.g., lifecycle management from key generation to revocation and replacement, public key infrastructure, cryptographic protocol design and algorithms used, access controls in place for secure key generation, and exchange and storage including segregation of keys used	Do you have a capability to allow creation of unique encryption keys per tenant?		X		
		EKM-02.2		Do you have a capability to manage encryption keys on behalf of tenants?		X		
		EKM-02.3		Do you maintain key management procedures?		X		
		EKM-02.4		Do you have documented ownership for each stage of the lifecycle of encryption keys?		X		
		EKM-02.5		Do you utilize any third party/open source/proprietary frameworks to manage encryption keys?	X			
Encryption & Key Management *Encryption*	EKM-03	EKM-03.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, for the use of encryption protocols for protection of	Do you encrypt tenant data at rest (on disk/storage) within your environment?		X		
		EKM-03.2		Do you leverage encryption to protect data and virtual machine images during transport across and between networks and hypervisor instances?	X			
		EKM-03.3		Do you have documentation establishing and defining your encryption management policies, procedures, and guidelines?		X		
Encryption & Key Management *Storage and Access*	EKM-04	EKM-04.1	Platform and data appropriate encryption (e.g., AES-256) in open/validated formats and standard algorithms shall be required. Keys shall not be stored in the cloud (i.e. at the cloud provider in question), but maintained by the cloud	Do you have platform and data appropriate encryption that uses open/validated formats and standard algorithms?	X			
		EKM-04.2		Are your encryption keys maintained by the cloud consumer or a trusted key management provider?	X			
		EKM-04.3		Do you store encryption keys in the cloud?	X			
		EKM-04.4		Do you have separate key management and key usage duties?		X		
Governance and Risk Management *Baseline Requirements*	GRM-01	GRM-01.1	Baseline security requirements shall be established for developed or acquired, organizationally-owned or	Do you have documented information security baselines for every component of your infrastructure (e.g., hypervisors, operating systems, routers, DNS servers, etc.)?	X			
		GRM-01.2		Do you have the capability to continuously monitor and report the compliance of your infrastructure against your information security baselines?	X			
Governance and Risk Management	GRM-02	GRM-02.1	Risk assessments associated with data	Does your organization's risk assessments take into account awareness of data residency, legal and statutory requirements for retention periods and data protection and classification?	X			

Risk Assessments		GRM-02.2	governance requirements	Do you conduct risk assessments associated with data governance requirements at least once a year?	X			
Governance and Risk Management *Management Oversight*	GRM-03	GRM-03.1	Managers are responsible for maintaining awareness of, and complying with, security policies, procedures, and standards that are relevant to their area of responsibility.	Are your technical, business, and executive managers responsible for maintaining awareness of and compliance with security policies, procedures, and standards for both themselves and their employees as they pertain to the manager and employees' area of responsibility?	X			
Governance and Risk Management	GRM-04	GRM-04.1	An Information Security Management Program	Do you provide tenants with documentation describing your Information Security Management Program (ISMP)?		X		
		GRM-04.2		Do you review your Information Security Management Program (ISMP) at least once a year?		X		
Governance and Risk Management *Management Support / Involvement*	GRM-05	GRM-05.1	Executive and line management shall take formal action to support information security through clearly-documented direction and commitment, and shall ensure the action has been assigned.	Do executive and line management take formal action to support information security through clearly-documented direction and commitment, and ensure the action has been assigned?	X			
Governance and Risk Management *Policy*	GRM-06	GRM-06.1	Information security policies and procedures shall be established and made readily available for review by all impacted personnel and external business relationships. Information security policies must be authorized by the	Are your information security policies and procedures made available to all impacted personnel and business partners, authorized by accountable business role/function and supported by the information security management program as per industry best practices (e.g. ISO 27001, SOC 2)?	X			Vengono seguite procedure adeguate alle ISO
		GRM-06.2		Are information security policies authorized by the organization's business leadership (or other accountable business role or function) and supported by a strategic business plan and an information security management program inclusive of defined information security roles and responsibilities for business leadership?	X			
		GRM-06.3		Do you have agreements to ensure your providers adhere to your information security and privacy policies?	X			
		GRM-06.4		Can you provide evidence of due diligence mapping of your controls, architecture, and processes to regulations and/or standards?	X			
		GRM-06.5		Do you disclose which controls, standards, certifications, and/or regulations you comply with?	X			
Governance and Risk Management *Policy Enforcement*	GRM-07	GRM-07.1	A formal disciplinary or sanction policy shall be established for employees who have violated	Is a formal disciplinary or sanction policy established for employees who have violated security policies and procedures?		X		
		GRM-07.2		Are employees made aware of what actions could be taken in the event of a violation via their policies and procedures?		X		
Governance and Risk Management *Business / Policy Change Impacts*	GRM-08	GRM-08.1	Risk assessment results shall include updates to security policies, procedures, standards, and controls to ensure that they remain relevant and effective.	Do risk assessment results include updates to security policies, procedures, standards, and controls to ensure they remain relevant and effective?	X			
Governance and Risk Management	GRM-09	GRM-09.1	The organization's business leadership (or	Do you notify your tenants when you make material changes to your information security and/or privacy policies?	X			Su richiesta del Cliente
		GRM-09.2		Do you perform, at minimum, annual reviews to your privacy and security policies?	X			
Governance and Risk Management *Assessments*	GRM-10	GRM-10.1	Aligned with the enterprise-wide framework, formal risk assessments shall be performed at least	Are formal risk assessments aligned with the enterprise-wide framework and performed at least annually, or at planned intervals, determining the likelihood and impact of all identified risks, using qualitative and quantitative methods?	X			
		GRM-10.2		Is the likelihood and impact associated with inherent and residual risk determined independently, considering all risk categories?	X			
Governance and Risk Management *Program*	GRM-11	GRM-11.1	Risks shall be mitigated to an acceptable level. Acceptance levels based on risk criteria shall be established and	Do you have a documented, organization-wide program in place to manage risk?	X			
		GRM-11.2		Do you make available documentation of your organization-wide risk management program?	X			
Human Resources *Asset Returns*	HRS-01		Upon termination of workforce personnel and/or expiration of	Upon termination of contract or business relationship, are employees and business partners adequately informed of their obligations for returning organizationally-owned assets?	X			
		HRS-01.2		Do you have asset return procedures outlining how assets should be returned within an established period?	X			
Human Resources *Background Screening*	HRS-02	HRS-02.1	Pursuant to local laws, regulations, ethics, and contractual constraints, all employment candidates, contractors, and third parties shall be subject to background verification proportional to the data classification to be accessed, the business requirements, and acceptable risk.	Pursuant to local laws, regulations, ethics, and contractual constraints, are all employment candidates, contractors, and involved third parties subject to background verification?	X			
Human Resources *Employment Agreements*	HRS-03	HRS-03.1	Employment agreements shall incorporate provisions and/or terms for adherence to established information	Do your employment agreements incorporate provisions and/or terms in adherence to established information governance and security policies?	X			
		HRS-03.2		Do you require that employment agreements are signed by newly hired or on-boarded workforce personnel prior to granting workforce personnel user access to corporate facilities, resources, and assets?	X			
Human Resources *Employment Termination*	HRS-04	HRS-04.1	Roles and responsibilities for performing employment termination	Are documented policies, procedures, and guidelines in place to govern change in employment and/or termination?	X			

Termination		HRS-04.2	Employment termination or change in employment procedures shall be assigned, documented, and communicated.	Do the above procedures and guidelines account for timely revocation of access and return of assets?	X			
Human Resources *Portable / Mobile Devices*	HRS-05	HRS-05.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to manage business risks associated with permitting mobile device access to corporate resources and may require the implementation of higher assurance compensating controls and acceptable-use policies and procedures (e.g., mandated security training, stronger identity, entitlement and access controls, and device monitoring).	Are policies and procedures established and measures implemented to strictly limit access to your sensitive data and tenant data from portable and mobile devices (e.g., laptops, cell phones, and personal digital assistants (PDAs)), which are generally higher-risk than non-portable devices (e.g., desktop computers at the provider organization's facilities)?	X			
Human Resources *Non-Disclosure Agreements*	HRS-06	HRS-06.1	Requirements for non-disclosure or confidentiality agreements reflecting the organization's needs for the protection of data and operational details shall be identified, documented, and reviewed at planned intervals.	Are requirements for non-disclosure or confidentiality agreements reflecting the organization's needs for the protection of data and operational details identified, documented, and reviewed at planned intervals?	X			
Human Resources *Roles / Responsibilities*	HRS-07	HRS-07.1	Roles and responsibilities of contractors, employees, and third-party users shall be documented as they relate to information assets and security.	Do you provide tenants with a role definition document clarifying your administrative responsibilities versus those of the tenant?	X			
Human Resources *Acceptable Use*	HRS-08	HRS-08.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, for defining allowances and conditions for permitting usage of organizationally-owned or managed user end-point devices (e.g., issued workstations, laptops, and mobile devices) and IT infrastructure network and systems components. Additionally, defining allowances and conditions to permit usage of personal mobile devices and associated applications with access to corporate resources (i.e., BYOD) shall be considered	Do you have policies and procedures in place to define allowances and conditions for permitting usage of organizationally-owned or managed user end-point devices and IT infrastructure network and systems components?	X			
		HRS-08.2		Do you define allowance and conditions for BYOD devices and its applications to access corporate resources?			X	
Human Resources *Training / Awareness*	HRS-09	HRS-09.1	A security awareness training program shall be established for all contractors, third-party users, and employees of the organization and mandated when	Do you provide a formal, role-based, security awareness training program for cloud-related access and data management issues (e.g., multi-tenancy, nationality, cloud delivery model, segregation of duties implications, and conflicts of interest) for all persons with access to tenant data?	X			comprensivo nella formazione generica del dipendente e dei collaboratori
		HRS-09.2		Do you specifically train your employees regarding their specific role and the information security controls they must fulfill?	X			comprensivo nella formazione generica del dipendente e dei collaboratori
		HRS-09.3		Do you document employee acknowledgment of training they have completed?	X			comprensivo nella formazione generica del dipendente e dei collaboratori

		HRS-09.4	appropriate. All individuals with access to	Is successful and timed completion of the training program(s) considered a prerequisite for acquiring and maintaining access to sensitive systems?	X			comprensivo nella formazione generica del dipendente e dei collaboratori
		HRS-09.5	organizational data shall	Are personnel trained and provided with awareness programs at least once a year?	X			
		HRS-09.6	receive appropriate awareness training and	Are administrators and data stewards properly educated on their legal responsibilities with regard to security and data integrity?	X			
Human Resources *User Responsibility*	HRS-10	HRS-10.1	All personnel shall be made aware of their roles	Are personnel informed of their responsibilities for maintaining awareness and compliance with published security policies, procedures, standards, and applicable regulatory requirements?	X			
		HRS-10.2	and responsibilities for:	Are personnel informed of their responsibilities for maintaining a safe and secure working environment?	X			
		HRS-10.3	• Maintaining awareness	Are personnel informed of their responsibilities for ensuring that equipment is secured and not left unattended?	X			
Human Resources *Workspace*	HRS-11	HRS-11.1	Policies and procedures	Are all computers and laptops configured such that there is lockout screen after a pre-defined amount of time?	X			
		HRS-11.2	shall be established to require that unattended	Are there policies and procedures to ensure that unattended workspaces do not have openly visible (e.g., on a desktop) sensitive documents?	X			
Identity & Access Management *Audit Tools Access*	IAM-01	IAM-01.1	Access to, and use of, audit tools that interact with the organization's information systems shall be appropriately segmented and restricted	Do you restrict, log, and monitor access to your information security management systems (e.g., hypervisors, firewalls, vulnerability scanners, network sniffers, APIs, etc.)?	X			
		IAM-01.2	to prevent compromise	Do you monitor and log privileged access (e.g., administrator level) to information security management systems?	X			
Identity & Access Management *User Access Policy*	IAM-02	IAM-02.1	User access policies and procedures shall be	Do you have controls in place ensuring timely removal of systems access that is no longer required for business purposes?	X			
		IAM-02.2	established, and supporting business	Do you have policies, procedures and technical measures in place to ensure appropriate data/assets access management in adherence to legal, statutory or regulatory compliance requirements?	X			
		IAM-02.3	processes and technical measures implemented,	Do you have procedures and technical measures in place for user account entitlement de-/provisioning based on the rule of least privilege?	X			
		IAM-02.4	for ensuring appropriate identity, entitlement, and	Do you have procedures and technical measures in place for data access segmentation in multi-tenant system architectures?	X			
		IAM-02.5	access management for all internal corporate and	Do you enforce data access permissions based on the rules of Authentication, Authorization and Accountability (AAA)?	X			
		IAM-02.6	customer (tenant) users with access to data and	Do your policies and procedures incorporate security controls for establishing higher levels of assurance for critical business case considerations, supported by multifactor authentication?		X		
		IAM-02.7	organizationally-owned or managed (physical and	Do you provide metrics to track the speed with which you are able to remove systems access that is no longer required for business purposes?			X	Il servizio si integra con i sistemi di autenticazione dei clienti
Identity & Access Management *Diagnostic / Configuration Ports Access*	IAM-03	IAM-03.1	User access to diagnostic and configuration ports shall be restricted to authorized individuals and applications.	Is user access to diagnostic and configuration ports restricted to authorized individuals and applications?	X			solo tramite applicazioni autorizzate
Identity & Access Management *Policies and Procedures*	IAM-04	IAM-04.1	Policies and procedures shall be established to	Do you manage and store the identity of all personnel who have access to the IT infrastructure, including their level of access?	X			
		IAM-04.2	store and manage identity information about every person who accesses IT	Do you manage and store the user identity of all personnel who have network access, including their level of access?		X		solo tramite applicazioni autorizzate
Identity & Access Management *Segregation of Duties*	IAM-05	IAM-05.1	User access policies and procedures shall be established, and supporting business processes and technical measures implemented, for restricting user access as per defined segregation of duties to address business risks associated with a user-role conflict of interest.	Do you provide tenants with documentation on how you maintain segregation of duties within your cloud service offering?	X			autorizzazione agli applicativi di configurazione
Identity & Access Management *Source Code Access Restriction*	IAM-06	IAM-06.1	Access to the organization's own	Are controls in place to prevent unauthorized access to your application, program, or object source code, and assure it is restricted to authorized personnel only?	X			
		IAM-06.2	developed applications, program, or object source	Are controls in place to prevent unauthorized access to tenant application, program, or object source code, and assure it is restricted to authorized personnel only?	X			
Identity & Access Management *Third Party Access*	IAM-07	IAM-07.1	The identification, assessment, and prioritization of risks	Does your organization conduct third-party unauthorized access risk assessments?	X			
		IAM-07.2	posed by business processes requiring third-party access to the	Are preventive, detective corrective compensating controls in place to mitigate impacts of unauthorized or inappropraite access?	X			
Identity & Access Management *User Access Restriction / Authorization*	IAM-08	IAM-08.1	Policies and procedures are established for permissible storage and access of identities used for authentication to	Do you document how you grant, approve and enforce access restrictions to tenant/customer credentials following the rules of least privilege?	X			tramite applicativo
		IAM-08.2	ensure identities are only accessible based on rules	Based on the rules of least privilege, do you have policies and procedures established for permissible storage and access of identities used for authentication?	X			

		IAM-08.3	of least privilege and replication limitation only to users explicitly defined as business necessary.	Do you limit identities' replication only to users explicitly defined as business necessary?	X			
Identity & Access Management *User Access Authorization*	IAM-09	IAM-09.1	Provisioning user access (e.g., employees, contractors, customers (tenants), business partners and/or supplier relationships) to data and	Does your management provision the authorization and restrictions for user access (e.g., employees, contractors, customers (tenants), business partners, and/or suppliers) prior to their access to data and any owned or managed (physical and virtual) applications, infrastructure systems, and network components?	X			
		IAM-09.2		Do you provide upon the request of users with legitimate interest access (e.g., employees, contractors, customers (tenants), business partners and/or suppliers) to data and any owned or managed (physical and virtual) applications, infrastructure systems and network components?	X			solo tramite applicativi autorizzati
Identity & Access Management *User Access Reviews*	IAM-10	IAM-10.1	User access shall be authorized and revalidated for entitlement appropriateness, at planned intervals, by the organization's business	Do you require a periodical authorization and validation (e.g. at least annually) of the entitlements for all system users and administrators (exclusive of users maintained by your tenants), based on the rule of least privilege, by business leadership or other accountable business role or function?	X			
		IAM-10.2		Do you collect evidence to demonstrate that the policy (see question IAM-10.1) has been enforced?	X			
		IAM-10.3		Do you ensure that remediation actions for access violations follow user access policies?	X			gli utenti accedono solo tramite applicativi autorizzati
		IAM-10.4		Will you share user entitlement and remediation reports with your tenants, if inappropriate access may have been allowed to tenant data?	X			
Identity & Access Management *User Access Revocation*	IAM-11	IAM-11.1	Timely de-provisioning (revocation or modification) of user access to data and organizationally-owned or	Is timely deprovisioning, revocation, or modification of user access to the organizations systems, information assets, and data implemented upon any change in status of employees, contractors, customers, business partners, or involved third parties?	X			
		IAM-11.2		Is any change in user access status intended to include termination of employment, contract or agreement, change of employment or transfer within the organization?	X			
Identity & Access Management *User ID Credentials*	IAM-12	IAM-12.1	Internal corporate or customer (tenant) user account credentials shall	Do you support use of, or integration with, existing customer-based Single Sign On (SSO) solutions to your service?		X		
		IAM-12.2	be restricted as per the	Do you use open standards to delegate authentication capabilities to your tenants?		X		solo tramite applicativi autorizzati
		IAM-12.3	following, ensuring appropriate identity,	Do you support identity federation standards (e.g., SAML, SPML, WS-Federation, etc.) as a means of authenticating/authorizing users?		X		solo tramite applicativi autorizzati
		IAM-12.4	entitlement, and access management and in	Do you have a Policy Enforcement Point capability (e.g., XACML) to enforce regional legal and policy constraints on user access?		X		solo tramite applicativi autorizzati
		IAM-12.5	accordance with established policies and	Do you have an identity management system (enabling classification of data for a tenant) in place to enable both role-based and context-based entitlement to data?		X		solo tramite applicativi autorizzati
		IAM-12.6	procedures: • Identity trust	Do you provide tenants with strong (multifactor) authentication options (e.g., digital certs, tokens, biometrics, etc.) for user access?		X		solo tramite applicativi autorizzati
		IAM-12.7	verification and service-to-	Do you allow tenants to use third-party identity assurance services?		X		solo tramite applicativi autorizzati
		IAM-12.8	service application (API) and information	Do you support password (e.g., minimum length, age, history, complexity) and account lockout (e.g., lockout threshold, lockout duration) policy enforcement?	X			solo tramite applicativi autorizzati
		IAM-12.9	processing interoperability	Do you allow tenants/customers to define password and account lockout policies for their accounts?	X			all'interno degli applicativi autorizzati
		IAM-12.10	(e.g., SSO and Federation)	Do you support the ability to force password changes upon first logon?		X		non è previsto
		IAM-12.11	• Account credential lifecycle management	Do you have mechanisms in place for unlocking accounts that have been locked out (e.g., self-service via email, defined challenge questions, manual unlock)?	X			all'interno degli applicativi autorizzati
Identity & Access Management *Utility Programs Access*	IAM-13	IAM-13.1	Utility programs capable of potentially overriding system, object, network, virtual machine, and application controls shall be restricted.	Are access to utility programs used to manage virtualized partitions (e.g. shutdown, clone, etc) appropriately restricted and monitored?	X			non è consentito
Infrastructure & Virtualization Security *Audit Logging / Intrusion Detection*	IVS-01	IVS-01.1	Higher levels of assurance are required for protection, retention, and lifecycle management of audit logs, adhering to applicable legal, statutory, or regulatory compliance obligations and providing unique user access accountability to detect potentially suspicious network behaviors and/or file integrity anomalies, and to support forensic investigative capabilities	Are file integrity (host) and network intrusion detection (IDS) tools implemented to help facilitate timely detection, investigation by root cause analysis, and response to incidents?	X			
		IVS-01.2		Is physical and logical user access to audit logs restricted to authorized personnel?	X			
		IVS-01.3		Can you provide evidence that due diligence mapping of regulations and standards to your controls/architecture/processes has been performed?	X			
		IVS-01.4		Are audit logs centrally stored and retained?	X			
		IVS-01.5		Are audit logs reviewed on a regular basis for security events (e.g., with automated tools)?	X			
Infrastructure & Virtualization Security *Change Detection*	IVS-02	IVS-02.1	The provider shall ensure the integrity of all virtual machine images at all times. Any changes made to virtual machine images must be logged and an alert raised regardless of their running state (e.g., dormant, off, or running). The results of a change or	Do you log and alert any changes made to virtual machine images regardless of their running state (e.g., dormant, off or running)?	X			
		IVS-02.2		Does the virtual machine management infrastructure include a tamper audit or software integrity function to detect changes to the build/configuration of the virtual machine?	X			
		IVS-02.3		Are changes made to virtual machines, or moving of an image and subsequent validation of the image's integrity, made immediately available to customers through electronic methods (e.g., portals or alerts)?	X			

Infrastructure & Virtualization Security *Clock Synchronization*	IVS-03	IVS-03.1	A reliable and mutually agreed upon external time source shall be used to synchronize the system clocks of all relevant information processing systems to facilitate tracing and reconstitution of activity timelines.	Do you use a synchronized time-service protocol (e.g., NTP) to ensure all systems have a common time reference?	X			
Infrastructure & Virtualization Security *Capacity / Resource Planning*	IVS-04	IVS-04.1	The availability, quality, and adequate capacity and resources shall be planned, prepared, and measured to deliver the required system performance in accordance with legal,	Do you provide documentation regarding what levels of system (e.g., network, storage, memory, I/O, etc.) oversubscription you maintain and under what circumstances/scenarios?		X		
		IVS-04.2		Do you restrict use of the memory oversubscription capabilities present in the hypervisor?		X		
		IVS-04.3		Does your system's capacity requirements take into account current, projected, and anticipated capacity needs for all systems used to provide services to the tenants?	X			
		IVS-04.4		Is system performance monitored and tuned in order to continuously meet regulatory, contractual, and business requirements for all the systems used to provide services to the tenants?	X			
Infrastructure & Virtualization Security *Management - Vulnerability Management*	IVS-05	IVS-05.1	Implementers shall ensure that the security vulnerability assessment tools or services accommodate the virtualization technologies used (e.g., virtualization aware).	Do security vulnerability assessment tools or services accommodate the virtualization technologies being used (e.g., virtualization aware)?	X			
Infrastructure & Virtualization Security *Network Security*	IVS-06	IVS-06.1	Network environments and virtual instances shall be designed and configured to restrict and monitor traffic between trusted and untrusted connections. These	For your IaaS offering, do you provide customers with guidance on how to create a layered security architecture equivalence using your virtualized solution?			X	
		IVS-06.2		Do you regularly update network architecture diagrams that include data flows between security domains/zones?	X			Tramite sucuri e fornitore di infrastruttura qualificata
		IVS-06.3		Do you regularly review for appropriateness the allowed access/connectivity (e.g., firewall rules) between security domains/zones within the network?	X			Tramite sucuri e fornitore di infrastruttura qualificata
		IVS-06.4		Are all firewall access control lists documented with business justification?	X			Tramite sucuri e fornitore di infrastruttura qualificata
Infrastructure & Virtualization Security *OS Hardening and Base Controls*	IVS-07	IVS-07.1	Each operating system shall be hardened to provide only necessary ports, protocols, and services to meet business needs and have in place supporting technical controls such as: antivirus, file integrity monitoring, and logging as part of their baseline operating build standard or template.	Are operating systems hardened to provide only the necessary ports, protocols, and services to meet business needs using technical controls (e.g., antivirus, file integrity monitoring, and logging) as part of their baseline build standard or template?	X			
Infrastructure & Virtualization Security *Production / Non-Production*	IVS-08	IVS-08.1	Production and non-production environments shall be separated to prevent unauthorized access or changes to	For your SaaS or PaaS offering, do you provide tenants with separate environments for production and test processes?	X			
		IVS-08.2		For your IaaS offering, do you provide tenants with guidance on how to create suitable production and test environments?			X	
		IVS-08.3		Do you logically and physically segregate production and non-production environments?	X			
Infrastructure & Virtualization Security *Segmentation*	IVS-09	IVS-09.1	Multi-tenant organizationally-owned or managed (physical and virtual) applications, and infrastructure system and network components, shall be designed, developed, deployed, and configured such that provider and customer (tenant) user access is	Are system and network environments protected by a firewall or virtual firewall to ensure business and customer security requirements?	X			
		IVS-09.2		Are system and network environments protected by a firewall or virtual firewall to ensure compliance with legal, regulatory and contractual requirements?	X			
		IVS-09.3		Have you implemented the necessary measures for the appropriate isolation and segmentation of tenants' access to infrastructure system and network components, in adherence to established policies, legal, statutory, and regulatory compliance obligations?	X			ogni cliente accede soltanto alle proprie risorse tramite programmi autorizzati
		IVS-09.4		Do you have the ability to logically segment or encrypt customer data such that data may be produced for a single tenant only, without inadvertently accessing another tenant's data?	X			
		IVS-09.5		Are system and network environments protected by a firewall or virtual firewall to ensure protection and isolation of sensitive data?	X			
Infrastructure & Virtualization Security *VM Security - Data Protection*	IVS-10	IVS-10.1	Secured and encrypted communication channels shall be used when migrating physical servers, applications, or data to virtualized servers and, where possible, shall use a network segregated from production-level networks for such migrations.	Are secured and encrypted communication channels used when migrating physical servers, applications, or data to virtual servers?			X	Se necessario, in collaborzione con il fornitore di infrastruttura qualificata
		IVS-10.2		Do you use a network segregated from production-level networks when migrating physical servers, applications, or data to virtual servers?			X	Se necessario, in collaborzione con il fornitore di infrastruttura qualificata

Infrastructure & Virtualization Security *VMM Security - Hypervisor Hardening*	IVS-11	IVS-11.1	Access to all hypervisor management functions or administrative consoles for systems hosting virtualized systems shall be restricted to personnel based upon the principle of least privilege and supported through technical controls (e.g., two-factor authentication, audit trails, IP address filtering, firewalls, and TLS encapsulated communications to the administrative consoles).	Do you restrict personnel access to all hypervisor management functions or administrative consoles for systems hosting virtualized systems based on the principle of least privilege and supported through technical controls (e.g., two-factor authentication, audit trails, IP address filtering, firewalls and TLS-encapsulated communications to the administrative consoles)?	X			
Infrastructure & Virtualization Security *Wireless Security*	IVS-12	IVS-12.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to protect wireless network environments, including the following: • Perimeter firewalls implemented and configured to restrict unauthorized traffic	Are policies and procedures established and mechanisms configured and implemented to protect the wireless network environment perimeter and to restrict unauthorized wireless traffic?	X			non viene utilizzata rete wireless - Accessi controllati
		IVS-12.2		Are policies and procedures established and mechanisms implemented to ensure wireless security settings are enabled with strong encryption for authentication and transmission, replacing vendor default settings (e.g., encryption keys, passwords, SNMP community strings)?	X			non viene utilizzata rete wireless - Accessi controllati
		IVS-12.3		Are policies and procedures established and mechanisms implemented to protect wireless network environments and detect the presence of unauthorized (rogue) network devices for a timely disconnect from the network?	X			non viene utilizzata rete wireless - Accessi controllati
Infrastructure & Virtualization Security *Network Architecture*	IVS-13	IVS-13.1	Network architecture diagrams shall clearly identify high-risk environments and data flows that may have legal compliance impacts.	Do your network architecture diagrams clearly identify high-risk environments and data flows that may have legal compliance impacts?	X			
		IVS-13.2		Do you implement technical measures and apply defense-in-depth techniques (e.g., deep packet analysis, traffic throttling and black-holing) for detection and timely response to network-based attacks associated with anomalous ingress or egress traffic patterns (e.g., MAC spoofing and ARP poisoning attacks) and/or distributed denial-of-service (DDoS) attacks?	X			
Interoperability & Portability *APIs*	IPY-01	IPY-01.1	The provider shall use open and published APIs to ensure support for interoperability between components and to facilitate migrating applications.	Do you publish a list of all APIs available in the service and indicate which are standard and which are customized?	X			
Interoperability & Portability *Data Request*	IPY-02	IPY-02.1	All structured and unstructured data shall be available to the customer and provided to them upon request in an industry-standard format (e.g., .doc, .xls, .pdf, logs, and flat files).	Is unstructured customer data available on request in an industry-standard format (e.g., .doc, .xls, or .pdf)?	X			
Interoperability & Portability *Policy & Legal*	IPY-03	IPY-03.1	Policies, procedures, and mutually-agreed upon provisions and/or terms shall be established to satisfy customer (tenant) requirements for service-	Do you provide policies and procedures (i.e. service level agreements) governing the use of APIs for interoperability between your service and third-party applications?	X			
		IPY-03.2		If using virtual infrastructure, do you allow virtual machine images to be downloaded and ported to a new cloud provider?	X			consentiamo la gestione del servizio anche sul provider che ospita il sito istituzionale del cliente
		IPY-03.3		Do you provide policies and procedures (i.e. service level agreements) governing the migration of application data to and from your service?	X			
Interoperability & Portability *Standardized Network Protocols*	IPY-04	IPY-04.1	The provider shall use secure (e.g., non-clear text and authenticated) standardized network	Is data import, data export, and service management be conducted over secure (e.g., non-clear text and authenticated), industry accepted standardized network protocols?	X			
		IPY-04.2		Do you provide consumers (tenants) with documentation detailing the relevant interoperability and portability network protocol standards that are involved?	X			
Interoperability & Portability *Virtualization*	IPY-05	IPY-05.1	The provider shall use an industry-recognized virtualization platform and standard virtualization formats (e.g., OVF) to help ensure interoperability,	Do you use an industry-recognized virtualization platform and standard virtualization formats (e.g., OVF) to help ensure interoperability?	X			
		IPY-05.2		If using virtual infrastructure, are machine images made available to the customer in a way that would allow the customer to replicate those images in their own off-site storage location?	X			
		IPY-05.3		Do you have documented custom changes made to any hypervisor in use, and all solution-specific virtualization hooks available for customer review?	X			
Mobile Security *Anti-Malware*	MOS-01	MOS-01.1	Anti-malware awareness training, specific to mobile devices, shall be included in the provider's information security awareness training.	Do you provide anti-malware training specific to mobile devices as part of your information security awareness training?	X			

Mobile Security *Application Stores*	MOS-02	MOS-02.1	A documented list of approved application stores has been communicated as acceptable for mobile devices accessing or storing provider managed data.	Do you document and make available lists of approved application stores for mobile devices accessing or storing company data and/or company systems?		X		non si accede tramite dispositivi mobili ai dati.
Mobile Security *Approved Applications*	MOS-03	MOS-03.1	The company shall have a documented policy prohibiting the installation of non-approved applications or approved applications not obtained through a pre-identified application store.	Do you have a policy enforcement capability (e.g., XACML) to ensure that only approved applications and those from approved application stores can be loaded onto a mobile device?		X		
Mobile Security *Approved Software for BYOD*	MOS-04	MOS-04.1	The BYOD policy and supporting awareness training clearly states the approved applications, application stores, and application extensions and plugins that may be used for BYOD usage.	Does your BYOD policy and training clearly state which applications and applications stores are approved for use on BYOD devices?			X	Uso non consentito
Mobile Security *Awareness and Training*	MOS-05	MOS-05.1	The provider shall have a documented mobile device policy that includes a documented definition for mobile devices and the acceptable usage and requirements for all mobile devices. The provider shall post and communicate the policy and requirements through the company's security awareness and training program.	Do you have a documented mobile device policy in your employee training that clearly defines mobile devices and the accepted usage and requirements for mobile devices?	X			
Mobile Security *Cloud Based Services*	MOS-06	MOS-06.1	All cloud-based services used by the company's mobile devices or BYOD shall be pre-approved for usage and the storage of company business data.	Do you have a documented list of pre-approved cloud based services that are allowed to be used for use and storage of company business data via a mobile device?		X		
Mobile Security *Compatibility*	MOS-07	MOS-07.1	The company shall have a documented application validation process to test for mobile device, operating system, and application compatibility issues.	Do you have a documented application validation process for testing device, operating system, and application compatibility issues?		X		
Mobile Security *Device Eligibility*	MOS-08	MOS-08.1	The BYOD policy shall define the device and eligibility requirements to allow for BYOD usage.	Do you have a BYOD policy that defines the device(s) and eligibility requirements allowed for BYOD usage?			X	Uso non consentito

Mobile Security *Device Inventory*	MOS-09	MOS-09.1	An inventory of all mobile devices used to store and access company data shall be kept and maintained. All changes to the status of these devices, (i.e., operating system and patch levels, lost or decommissioned status, and to whom the device is assigned or approved for usage (BYOD)), will be included for each device in the inventory.	Do you maintain an inventory of all mobile devices storing and accessing company data which includes device status (e.g., operating system and patch levels, lost or decommissioned, device assignee)?	X			
Mobile Security *Device Management*	MOS-10	MOS-10.1	A centralized, mobile device management solution shall be deployed to all mobile devices permitted to store, transmit, or process customer data.	Do you have a centralized mobile device management solution deployed to all mobile devices that are permitted to store, transmit, or process company data?		X		
Mobile Security *Encryption*	MOS-11	MOS-11.1	The mobile device policy shall require the use of encryption either for the entire device or for data identified as sensitive on all mobile devices and shall be enforced through technology controls.	Does your mobile device policy require the use of encryption for either the entire device or for data identified as sensitive enforceable through technology controls for all mobile devices?			X	memorizzazione dei dati sensibili non consentita
Mobile Security *Jailbreaking and Rooting*	MOS-12	MOS-12.1	The mobile device policy shall prohibit the circumvention of built-in security controls on	Does your mobile device policy prohibit the circumvention of built-in security controls on mobile devices (e.g., jailbreaking or rooting)?		X		
		MOS-12.2		Do you have detective and preventative controls on the device or via a centralized device management system which prohibit the circumvention of built-in security controls?		X		
Mobile Security *Legal*	MOS-13	MOS-13.1	The BYOD policy includes clarifying language for the expectation of privacy, requirements for	Does your BYOD policy clearly define the expectation of privacy, requirements for litigation, e-discovery, and legal holds?			X	Uso non consentito
		MOS-13.2		Does the BYOD policy clearly state the expectations over the loss of non-company data in case a wipe of the device is required?			X	Uso non consentito
Mobile Security *Lockout Screen*	MOS-14	MOS-14.1	BYOD and/or company owned devices are configured to require an automatic lockout screen, and the requirement shall be enforced through technical controls.	Do you require and enforce via technical controls an automatic lockout screen for BYOD and company owned devices?			X	Uso non consentito
Mobile Security *Operating Systems*	MOS-15	MOS-15.1	Changes to mobile device operating systems, patch levels, and/or applications shall be managed through the company's change management processes.	Do you manage all changes to mobile device operating systems, patch levels, and applications via your company's change management processes?		X		
Mobile Security *Passwords*	MOS-16	MOS-16.1	Password policies, applicable to mobile devices, shall be documented and enforced	Do you have password policies for enterprise issued mobile devices and/or BYOD mobile devices?			X	Uso non consentito
		MOS-16.2		Are your password policies enforced through technical controls (i.e. MDM)?		X		
		MOS-16.3		Do your password policies prohibit the changing of authentication requirements (i.e. password/PIN length) via a mobile device?		X		
Mobile Security *Policy*	MOS-17	MOS-17.1	The mobile device policy shall require the BYOD user to perform backups	Do you have a policy that requires BYOD users to perform backups of specified corporate data?			X	Uso non consentito
		MOS-17.2		Do you have a policy that requires BYOD users to prohibit the usage of unapproved application stores?			X	Uso non consentito
		MOS-17.3		Do you have a policy that requires BYOD users to use anti-malware software (where supported)?			X	Uso non consentito
Mobile Security *Remote Wipe*	MOS-18	MOS-18.1	All mobile devices permitted for use through the company BYOD	Does your IT provide remote wipe or corporate data wipe for all company-accepted BYOD devices?			X	Uso non consentito
		MOS-18.2		Does your IT provide remote wipe or corporate data wipe for all company-assigned mobile devices?		X		Eventuali dispositivi mobili aziendali non devono contenere dati sensibili
Mobile Security *Security Patches*	MOS-19	MOS-19.1	Mobile devices connecting to corporate networks or storing and accessing company information shall	Do your mobile devices have the latest available security-related patches installed upon general release by the device manufacturer or carrier?		X		
		MOS-19.2		Do your mobile devices allow for remote validation to download the latest security patches by company IT personnel?		X		
Mobile Security	MOS-20	MOS-20.1	The BYOD policy shall	Does your BYOD policy clarify the systems and servers allowed for use or access on the BYOD-enabled device?			X	Uso non consentito

Users		MOS-20.2	clarify the systems and servers allowed for use or access on a BYOD-enabled device.	Does your BYOD policy specify the user roles that are allowed access via a BYOD-enabled device?			X	
Security Incident Management, E-Discovery, & Cloud Forensics *Contact / Authority Maintenance*	SEF-01	SEF-01.1	Points of contact for applicable regulation authorities, national and local law enforcement, and other legal jurisdictional authorities shall be maintained and regularly updated (e.g., change in impacted-scope and/or a change in any compliance obligation) to ensure direct compliance liaisons have been established and to be prepared for a forensic investigation requiring rapid engagement with law enforcement.	Do you maintain liaisons and points of contact with local authorities in accordance with contracts and appropriate regulations?	X			
Security Incident Management, E-Discovery, & Cloud Forensics *Incident Management*	SEF-02	SEF-02.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to triage security-related events and ensure timely and thorough incident	Do you have a documented security incident response plan?	X			
		SEF-02.2		Do you integrate customized tenant requirements into your security incident response plans?		X		
		SEF-02.3		Do you publish a roles and responsibilities document specifying what you vs. your tenants are responsible for during security incidents?	X			
		SEF-02.4		Have you tested your security incident response plans in the last year?	X			
Security Incident Management, E-Discovery, & Cloud Forensics *Incident Reporting*	SEF-03	SEF-03.1	Workforce personnel and external business relationships shall be informed of their responsibility and, if required, shall consent and/or contractually agree	Are workforce personnel and external business relationships adequately informed of their responsibility, and, if required, consent and/or contractually required to report all information security events in a timely manner?	X			
		SEF-03.2		Do you have predefined communication channels for workforce personnel and external business partners to report incidents in a timely manner adhering to applicable legal, statutory, or regulatory compliance obligations?	X			
Security Incident Management, E-Discovery, & Cloud Forensics *Incident Response Legal Preparation*	SEF-04	SEF-04.1	Proper forensic procedures, including chain of custody, are required for the presentation of evidence to support potential legal action subject to the relevant jurisdiction after an information security incident. Upon notification, customers and/or other external business partners impacted by a security breach shall be given the opportunity to participate	Does your incident response plan comply with industry standards for legally admissible chain-of-custody management processes and controls?	X			
		SEF-04.2		Does your incident response capability include the use of legally admissible forensic data collection and analysis techniques?	X			
		SEF-04.3		Are you capable of supporting litigation holds (freeze of data from a specific point in time) for a specific tenant without freezing other tenant data?	X			i dati di ciascun cliente sono separati dagli altri
		SEF-04.4		Do you enforce and attest to tenant data separation when producing data in response to legal subpoenas?	X			i dati di ciascun cliente sono separati dagli altri
Security Incident Management, E-Discovery, & Cloud Forensics *Incident Response Metrics*	SEF-05	SEF-05.1	Mechanisms shall be put in place to monitor and quantify the types, volumes, and costs of information security incidents.	Do you monitor and quantify the types, volumes, and impacts on all information security incidents?	X			
		SEF-05.2		Will you share statistical information for security incident data with your tenants upon request?	X			
Supply Chain Management, Transparency, and Accountability *Data Quality and Integrity*	STA-01	STA-01.1	Providers shall inspect, account for, and work with their cloud supply-chain partners to correct data quality errors and associated risks. Providers shall design and implement controls to	Do you inspect and account for data quality errors and associated risks, and work with your cloud supply-chain partners to correct them?	X			
		STA-01.2		Do you design and implement controls to mitigate and contain data security risks through proper separation of duties, role-based access, and least-privileged access for all personnel within your supply chain?	X			

Supply Chain Management, Transparency, and Accountability *Incident Reporting*	STA-02	STA-02.1	The provider shall make security incident information available to all affected customers and providers periodically through electronic methods (e.g., portals).	Do you make security incident information available to all affected customers and providers periodically through electronic methods (e.g., portals)?	X			
Supply Chain Management, Transparency, and Accountability *Network / Infrastructure Services*	STA-03	STA-03.1	Business-critical or customer (tenant) impacting (physical and virtual) application and system-system interface (API) designs and configurations, and	Do you collect capacity and use data for all relevant components of your cloud service offering?	X			
		STA-03.2		Do you provide tenants with capacity planning and use reports?		X		Su richiesta del Cliente
Supply Chain Management, Transparency, and Accountability *Provider Internal Assessments*	STA-04	STA-04.1	The provider shall perform annual internal assessments of conformance and effectiveness of its policies, procedures, and supporting measures and metrics.	Do you perform annual internal assessments of conformance and effectiveness of your policies, procedures, and supporting measures and metrics?	X			
Supply Chain Management, Transparency, and Accountability *Third Party Agreements*	STA-05	STA-05.1	Supply chain agreements (e.g., SLAs) between providers and customers (tenants) shall incorporate at least the following mutually-agreed upon provisions and/or terms: • Scope of business relationship and services offered (e.g., customer (tenant) data acquisition, exchange and usage, feature sets and functionality, personnel and infrastructure network and systems components for service delivery and support, roles and responsibilities of provider and customer (tenant) and any subcontracted or outsourced business relationships, physical geographical location of hosted services, and any known regulatory compliance considerations) • Information security requirements, provider and customer (tenant) primary points of contact for the duration of the business relationship, and references to detailed supporting and relevant business processes and technical measures implemented to enable	Do you select and monitor outsourced providers in compliance with laws in the country where the data is processed, stored, and transmitted?	X			i nostri partner hanno un ruolo esclusivamente commerciale
		STA-05.2		Do you select and monitor outsourced providers to ensure that they are in compliance with applicable legislation?	X			i nostri partner hanno un ruolo esclusivamente commerciale
		STA-05.3		Does legal counsel review all third-party agreements?	X			i nostri partner hanno un ruolo esclusivamente commerciale
		STA-05.4		Do third-party agreements include provision for the security and protection of information and assets?	X			i nostri partner hanno un ruolo esclusivamente commerciale
		STA-05.5		Do you have the capability to recover data for a specific customer in the case of a failure or data loss?	X			
		STA-05.6		Do you have the capability to restrict the storage of customer data to specific countries or geographic locations?	X			
		STA-05.7		Can you provide the physical location/geography of storage of a tenant's data upon request?	X			
		STA-05.8		Can you provide the physical location/geography of storage of a tenant's data in advance?	X			
		STA-05.9		Do you allow tenants to define acceptable geographical locations for data routing or resource instantiation?		X		
		STA-05.10		Are systems in place to monitor for privacy breaches and notify tenants expeditiously if a privacy event may have impacted their data?	X			
		STA-05.11		Do you allow tenants to opt out of having their data/metadata accessed via inspection technologies?			X	Non prevista
		STA-05.12		Do you provide the client with a list and copies of all subprocessing agreements and keep this updated?		X		Su richiesta se sono presenti sub responsabili
Supply Chain Management, Transparency, and Accountability *Supply Chain Governance Reviews*	STA-06	STA-06.1	Providers shall review the risk management and governance processes of their partners so that practices are consistent and aligned to account for risks inherited from other members of that partner's cloud supply chain.	Do you review the risk management and governance processes of partners to account for risks inherited from other members of that partner's supply chain?	X			i nostri partner hanno un ruolo esclusivamente commerciale. Come da accordi contrattuali ed allegati
Supply Chain Management, Transparency, and Accountability *Supply Chain Metrics*	STA-07	STA-07.1	Policies and procedures shall be implemented to ensure the consistent review of service agreements (e.g., SLAs)	Are policies and procedures established, and supporting business processes and technical measures implemented, for maintaining complete, accurate, and relevant agreements (e.g., SLAs) between providers and customers (tenants)?	X			

Supply Chain Metrics		STA-07.2	agreements (e.g., SLAs) between providers and customers (tenants) across the relevant supply chain (upstream/downstream). Reviews shall be performed at least annually and identify non-conformance to established agreements. The reviews should result in actions to address service-level conflicts or inconsistencies resulting from disparate supplier relationships.	Do you have the ability to measure and address non-conformance of provisions and/or terms across the entire supply chain (upstream/downstream)?	X			
		STA-07.3		Can you manage service-level conflicts or inconsistencies resulting from disparate supplier relationships?	X			
		STA-07.4		Do you provide tenants with ongoing visibility and reporting of your operational Service Level Agreement (SLA) performance?		X		
		STA-07.5		Do you make standards-based information security metrics (CSA, CAMM, etc.) available to your tenants?	X			
		STA-07.6		Do you provide customers with ongoing visibility and reporting of your SLA performance?		X		
		STA-07.7		Do your data management policies and procedures address tenant and service level conflicts of interests?	X			
		STA-07.8		Do you review all service level agreements at least annually?	X			
Supply Chain Management, Transparency, and Accountability *Third Party Assessment*	STA-08	STA-08.1	Providers shall assure reasonable information security across their information supply chain by performing an annual review. The review shall include all partners/third party providers upon	Do you assure reasonable information security across your information supply chain by performing an annual review?	X			
		STA-08.2		Does your annual review include all partners/third-party providers upon which your information supply chain depends?	X			I nostri partner hanno un ruolo esclusivamente commerciale. Eventuali fornitori devono rispettati i requisiti contrattuali e le normative di riferimento
Supply Chain Management, Transparency, and Accountability *Third Party Audits*	STA-09	STA-09.1	Third-party service providers shall demonstrate compliance with information security and confidentiality, access control, service definitions, and delivery level agreements included in third-party contracts. Third-party reports	Do you mandate annual information security reviews and audits of your third party providers to ensure that all agreed upon security requirements are met?	X			
		STA-09.2		Do you have external third party services conduct vulnerability scans and periodic penetration tests on your applications and networks?	X			
Threat and Vulnerability Management *Antivirus / Malicious Software*	TVM-01	TVM-01.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to prevent the execution of malware on	Do you have anti-malware programs that support or connect to your cloud service offerings installed on all of your IT infrastructure network and systems components?	X			
		TVM-01.2		Do you ensure that security threat detection systems using signatures, lists, or behavioral patterns are updated across all infrastructure components as prescribed by industry best practices?	X			
Threat and Vulnerability Management *Vulnerability / Patch Management*	TVM-02	TVM-02.1	Policies and procedures shall be established, and supporting processes and technical measures implemented, for timely detection of vulnerabilities within organizationally-owned or managed applications, infrastructure network and system components (e.g., network vulnerability assessment,	Do you conduct network-layer vulnerability scans regularly as prescribed by industry best practices?	X			
		TVM-02.2		Do you conduct application-layer vulnerability scans regularly as prescribed by industry best practices?	X			
		TVM-02.3		Do you conduct local operating system-layer vulnerability scans regularly as prescribed by industry best practices?	X			
		TVM-02.4		Will you make the results of vulnerability scans available to tenants at their request?	X			
		TVM-02.5		Do you have a capability to patch vulnerabilities across all of your computing devices, applications, and systems?	X			
		TVM-02.6		Do you inform customers (tenant) of policies and procedures and identified weaknesses if customer (tenant) data is used as part the service and/or customer (tenant) has some shared responsibility over implementation of control?	X			Tipicamente, i dati del cliente non fanno parte del servizio offerto e non vengono usati per altre finalità. Il Cliente è responsabile dei dati che memorizza.
Threat and Vulnerability Management *Mobile Code*	TVM-03	TVM-03.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to prevent the execution of unauthorized mobile code, defined as software transferred between systems over a trusted or untrusted network and executed on a local system without explicit	Is mobile code authorized before its installation and use, and the code configuration checked, to ensure that the authorized mobile code operates according to a clearly defined security policy?			X	
		TVM-03.2		Is all unauthorized mobile code prevented from executing?			X	