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			Development, support and maintenance of our Software Products and SAAS services area are in compliance with ISO9001 certification; for each development is adopted a design analysis that includes security and privacy aspects.
		AIS-01.2		Do you use an automated source code analysis tool to detect security defects in code prior to production?		X		From February 2021 this process will be applied also for this platform.This process is already active for other products
		AIS-01.3		Do you use manual source-code analysis to detect security defects in code prior to production?	X			Source-code analysis is done annually
		AIS-01.4		Do you verify that all of your software suppliers adhere to industry standards for Systems/Software Development Lifecycle (SDLC) security?	X			Partner and Suppliers meet contractual requirements in order to be in line with WK's security policies, additional checks will be carried out to verify compliance if necessary. "WK - Information Security Standards for WK Suppliers-STD-1203a.pdf"
		AIS-01.5		(SaaS only) Do you review your applications for security vulnerabilities and address any issues prior to deployment to production?	X			Our SaaS application is also reviewed annually
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 be addressed.	Are all identified security, contractual, and regulatory requirements for customer access contractually addressed and remediated prior to granting customers access to data, assets, and information systems?	X			Customers have access to their own data, in compliance with the supplyer rules and the related SLA's definined by contacts .
		AIS- 02.2		Are all requirements and trust levels for customers' access defined and documented?	X			It is documented as configured defined tables of the software, in order to define access rights of the users.
Application & Interface Security *Data Integrity*	AIS-03	AIS-03.1	Data input and output integrity routines (i.e., reconciliation and edit checks) shall be implemented for application interfaces and databases to prevent manual or systematic processing errors, corruption of data, or misuse.	Does your data management policies and procedures require audits to verify data input and output integrity routines?	X			Our Security policies only include Audit on security event logs and not on data integrity routines. BU can define stricter policies than the Global ones. WK - Security Logging and Monitoring GBS -STD-1408
		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			The architecture has been designed and built in accordance with the information management security standards of ISO 27001 certification.
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 security operations. All audit activities must be agreed upon prior to executing any audits.	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			SOC1 and SOC2 Reports Type II are available
		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 nonconformities of established policies, standards, procedures, and compliance obligations.	Do you allow tenants to view your SOC2/ISO 27001 or similar third-party audit or certification reports?	X			SOC1 and SOC2 Reports Type II are available
		AAC-02.2		Do you conduct network penetration tests of your cloud service infrastructure at least annually?	X			A Penetration Test is performed at least annually on all IP addresses to identify any vulnerabilities.
		AAC-02.3		Do you conduct application penetration tests of your cloud infrastructure regularly as prescribed by industry best practices and guidance?	X			Wk policies define Penetration test activities performed by a third party at least once a year.
		AAC-02.4		Do you conduct internal audits at least annually?	X			
		AAC-02.5		Do you conduct independent audits at least annually?	X			SOC1 and SOC2 Reports Type II are available
		AAC-02.6		Are the results of the penetration tests available to tenants at their request?	X			They are confidential documents and are shared only on demand (NDA signature required)
		AAC-02.7		Are the results of internal and external audits available to tenants at their request?	X			SOC1 and SOC2 Reports Type II are available
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			Regulatory compliance teams ensure the compliance of applications to the Italian and European law.
Business Continuity Management & Operational Resilience *Business Continuity Planning*	BCR-01	BCR-01.1		Does your organization have a plan or framework for business continuity management or disaster recovery management?	X			Wolters kluwer has a global business continuity management plan. Wolters kluwer Italia is obliged to respect this Policy. The Disaster Recovery Plan is currently being finalized (expected on 2021).
		BCR-01.2		Do you have more than one provider for each service you depend on?	X			The datacenter is configured in a Business Continuity perspective, using different physical sites and different service providers in order to react to any unexpected events.

		BCR-01.3	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 • Accessible to and understood by those who will use them • Owned by a named person(s) who is responsible for their review, update, and approval • Defined lines of communication, roles, and responsibilities • Detailed recovery procedures, manual work-around, and reference information • Method for plan invocation	Do you provide a disaster recovery capability?	X			
		BCR-01.4		Do you monitor service continuity with upstream providers in the event of provider failure?	X			We do not have a formal Disaster Recovery Plan, but we have infrastructure redundancy and monitoring processes.
		BCR-01.5		Do you provide access to operational redundancy reports, including the services you rely on?	X			Wolters kluwer has a global business continuity management plan. Wolters kluwer Italia is obliged to respect this Policy. The Disaster Recovery Plan is currently being finalized (expected on 2021).
		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		The Disaster Recovery Plan is currently being finalized (expected on 2021).
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			Wolters kluwer has a global business continuity management plan in line with ISO27001 directives. Wolters kluwer Italia is obliged to respect this Policy. The Disaster Recovery Plan is currently being finalized (expected on 2021).
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, monitored, maintained, and tested for continual effectiveness at planned intervals to ensure protection from unauthorized interception or damage, and designed with automated fail-over or other redundancies in the event of planned or unplanned disruptions.	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			The datacenter adopts different monitoring measures for infrastructure security, in line with what established by ISO27001 standards
		BCR-03.2		Has your organization implemented environmental controls, fail-over mechanisms or other redundancies to secure utility services and mitigate environmental conditions?	X			The datacenter is configured as a distributed datacencer perspective using different physical sites and different service providers in order to react to any unexpected events.
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			Documents are available to technicians who need to have access to the systems.
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			WK data center sites are built according to Standard standards and certified at least TIER 3.
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		The locations where the data centers are placed are far from waterways, rivers or seas and with low probability of earthquakes.
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			Policy, procedures and maintenance of the Datacenter infrastructure are in compliance with ISO27001 standards.
		BCR-07.2		Do you have an equipment and datacenter maintenance routine or plan?	X			Policy, procedures and maintenance of the Datacenter infrastructure are in compliance with ISO27001 standards.
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			The datacenter is configured as a distributed datacencer perspective using different physical sites and different service providers in order to react to any unexpected events.
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 third party service providers • Understand threats to critical products and services • Determine impacts resulting from planned or unplanned disruptions and how these vary over time • Establish the maximum tolerable period for disruption • Establish priorities for recovery • Establish recovery time objectives for resumption of critical products and services within their maximum tolerable period of disruption • Estimate the resources required for resumption	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			Support by BIA process (Business impact analysis)
		BCR-09.2		Does your organization conduct impact analysis pertaining to possible disruptions to the cloud service?	X			Support by BIA process (Business impact analysis)
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			Security policies are available for all employees
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 obligations. Backup and recovery measures shall be incorporated as part of business continuity planning and tested accordingly for effectiveness.	Do you have technical capabilities to enforce tenant data retention policies?	X			On request we can adopt client retention data policies
		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			Policies and procedures define data retention periods (also described contractually).
		BCR-11.3		Have you implemented backup or recovery mechanisms to ensure compliance with regulatory, statutory, contractual or business requirements?	X			Backup procedures and recovery mechanisms (contractually defined) are implemented
		BCR-11.4		If using virtual infrastructure, does your cloud solution include independent hardware restore and recovery capabilities?	X			On request
		BCR-11.5		If using virtual infrastructure, do you provide tenants with a capability to restore a virtual machine to a previous configuration?	X			Customer can not perform the restore of virtual images, but in case of need or on customer demand, that can be performed in agreement with SLAs (Service Level Agreements) to customers.

		BCR-11.6		Does your cloud solution include software/provider independent restore and recovery capabilities?	x			On request
		BCR-11.7		Do you test your backup or redundancy mechanisms at least annually?	x			The effectiveness of the backup systems is regularly verified by monitoring the logs events
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 management procedures for the management of resources and applications/services are in place.
Change Control & Configuration Management *Outsourced Development*	CCC-02	CCC-02.1	External business partners shall adhere to the same policies and procedures for change management, release, and testing as internal developers within the organization (e.g., ITIL service management processes).	Are policies and procedures for change management, release, and testing adequately communicated to external business partners?	x			Partner and Suppliers meet contractual requirements in order to be in line with WK's security policies, additional checks will be carried out to verify compliance if necessary. "WK - Information Security Standards for WK Suppliers-STD-1203a.pdf"
		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			Change control and testing processes are defined in our change procedures to ensure data integrity, confidentiality and availability.
		CCC-03.2		Is documentation describing known issues with certain products/services available?	x			Customer service, according to the best practices defined by the ISO 9001 procedure, adopts a knowledge base.
		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			Customer service, according to the best practices defined in the ISO 9001 procedure, adopts a knowledge base. New versions of the software are tested by quality control staff who verify that there is no issue. In case of issue, the change process is adopted by evaluating the impact or remediation the issue before the release of the new version.
		CCC-03.4		Do you have controls in place to ensure that standards of quality are being met for all software development?	x			Customer service, according to the best practices defined in the ISO 9001 procedure, adopts a knowledge base. New versions of the software are tested by quality control staff who verify that there is no issue. In case of issue, the change process is adopted by evaluating the impact or remediation the issue before the release of the new version.
		CCC-03.5		Do you have controls in place to detect source code security defects for any outsourced software development activities?	x			Customer service, according to the best practices defined in the ISO 9001 procedure, adopts a knowledge base. New versions of the software are tested by quality control staff who verify that there is no issue. In case of issue, the change process is adopted by evaluating the impact or remediation the issue before the release of the new version.
		CCC-03.6		Are mechanisms in place to ensure that all debugging and test code elements are removed from released software versions?	x			Customer service, according to the best practices defined in the ISO 9001 procedure, adopts a knowledge base. New versions of the software are tested by quality control staff who verify that there is no issue. In case of issue, the change process is adopted by evaluating the impact or remediation the issue before the release of the new version.
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			Yes, we have policies that define SW in Blacklist and we use market tools (CyberArk) for monitoring the installed SW.
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 customer (tenant)-impacting (physical and virtual) applications and system-system interface (API) designs and configurations. • Infrastructure network and systems components. Technical measures shall be implemented to provide assurance that all changes directly correspond to a registered change request, business-critical or customer (tenant), and/or authorization by, the customer (tenant) as per agreement (SLA) prior to deployment.	Do you provide tenants with documentation that describes your production change management procedures and their roles/rights/responsibilities within it?	x			Confidential company documents are shared only on demand with NDA signature
		CCC-05.2		Do you have policies and procedures established for managing risks with respect to change management in production environments?	x			For Saas services, Change Management procedures and processes are adopted in compliance with contractual SLAs and analyzing aspects related to the risks deriving from change operations.
		CCC-05.3		Do you have technical measures in place to ensure that changes in production environments are registered, authorized and in adherence with existing SLAs?	x			For Saas services, Change Management procedures and processes are adopted in compliance with contractual SLAs and analyzing aspects related to the risks deriving from change operations.
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 data type, value, sensitivity, and criticality to the organization.	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			We have policies that define data classification and related marking, according to 4 categories. A minimum tag standard is also defined. WK - Data Classification and Handling GBS-STD-1202 WK - Asset Management GBS-STD-1201
		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			We have policies that define the data classification and related marking, according to 4 categories. A minimum tag standard is also defined. WK - Data Classification and Handling GBS-STD-1202 WK - Asset Management GBS-STD-1202
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 for data that is resident (permanently or temporarily) within the service's geographically distributed (physical and virtual) applications and infrastructure network and systems components and/or shared with other third parties to ascertain any regulatory, statutory, or supply chain agreement (SLA) compliance impact, and to address any other business risks associated with the data. Upon request, provider shall inform customer (tenant) of compliance impact and risk, especially if customer data is used as part of the services.	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			Data flow is in the inventory and documented, contracts with customer indicate that data are stored in the Italian data centre.
		DSI-02.2		Can you ensure that data does not migrate beyond a defined geographical residency?	x			The data stored in the data centres where the service is provided cannot be migrated to other states than Italy.
Data Security & Information Lifecycle Management *E-commerce Transactions*	DSI-03	DSI-03.1	Data related to electronic commerce (e-commerce) that traverses public networks shall be appropriately classified and protected from fraudulent activity, unauthorized disclosure, or modification in such a manner to prevent contract dispute and compromise of data.	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			The connection to SAAS service are available in transit via HTTPS or on SFTP, if data exchange flows is needed.
		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			The connection to SAAS service are available in transit via HTTPS or on SFTP if data exchange flows is needed.
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 label inheritance shall be implemented for objects that act as aggregate containers for data.	Are policies and procedures established for data labeling and handling in order to ensure the security of data and objects that contain data?	x			We have an Information classification policy, which classifies information into 4 clusters, and defines the marking, based on ISO Standards and in compliance with GDPR. WK - Data Classification and Handling GBS-STD-1202.pdf WK - Asset Management GBS-STD-1201.pdf
		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			Customer Data are authorized for storage and processing only in the production environment. WK - Data Classification and Handling GBS-STD-1202.pdf
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			System Administrators (and 3°parties who administer our systems) are defined and identified, obligations and responsibilities subscribed, activities/accesses monitored with logging management tools.
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 and complete removal of data from all storage media, ensuring data is not recoverable by any computer forensic means.	Do you support the secure deletion (e.g., degaussing/cryptographic wiping) of archived and backed-up data?	X			Any device that contains non- volatile memory, storage, and/or all types of media (Tapes, compact disks, DVDs, CDs, and other media) should be erased and physically destroyed when retired from service in accordance with WK Asset Disposal Standards. WK - Data Classification and Handling GBS-STD-1202.pdf WK - Asset Disposal GBS-STD-1206.pdf
		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			Exit procedure and data portability/deletion is contractually defined
Datacenter Security *Asset Management*	DCS-01	DCS-01.1	Assets must be classified in terms of business criticality, service-level expectations, and operational continuity requirements. A complete inventory of business-critical assets located at all sites and/or geographical locations and their usage over time shall be maintained and updated regularly, and assigned ownership by defined roles and responsibilities.	Do you classify your assets in terms of business criticality, service-level expectations, and operational continuity requirements?	X			Assets are tracked and monitored using tools and, if necessary, manually as defined by our policies. WK - Asset Management GBS-STD-1201.pdf
		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			Data centers adopt physical security measures, in accordance with our security policies. WK - Data Center Physical Security GBS-STD-1416
Datacenter Security *Equipment Identification*	DCS-03	DCS-03.1	Automated equipment identification shall be used as a method of connection authentication. Location-aware technologies may be used to validate connection authentication integrity based on known equipment location.	Do you have a capability to use system geographic location as an authentication factor?		X		Service available on request.
		DCS-03.2		Is automated equipment identification used as a method to validate connection authentication integrity based on known equipment location?		X		Service available on request.
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			Authorization is requested and obtained solely in case such transfer implies relocation of data outside the territory of EU and/or amendments of the lists of subprocessor/s in fully compliance with Gdpr. Relocation outside EU will require adequate guarantees as per indication of Privacy Authority.
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			Confidential documents that can be shared only on demand with NDA signature
Datacenter Security *Policy*	DCS-06	DCS-06.1	Policies and procedures shall be established, and supporting business processes implemented, for maintaining a safe and secure working environment in offices, rooms, facilities, and secure areas storing sensitive information.	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			Confidential documents that can be shared only on demand with NDA signature
		DCS-06.2		Can you provide evidence that your personnel and involved third parties have been trained regarding your documented policies, standards, and procedures?	X			Confidential documents that can be shared only on demand with NDA signature
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			There are passive and active control measures in all our data centers, as required by our policies: WK - Data Center Physical Security GBS-STD-1416
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			Customer contractors or maintenance personnel who have justified reason to enter our on premises faciliy, are registred and always accompanied by an Employee, the data centers wher customer data are processing are physically separated from our facilities. WK - Non data center physical security GBS-STD-1406
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			Access to the servers is allowed only to personnel authorized for processing. Protection measures are in place to prevent access to the machines by unauthorized personnel.
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			Cryptography processes cover several aspects: intransit and at rest, we have policies that define the life cycle and management of encryption keys. WK - PKI Security GBS-STD-1404 WK - Encryption and Key Management GBS-STD-1407
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 for encrypted data or sessions). Upon request, provider shall inform the customer (tenant) of changes within the cryptosystem, especially if the customer (tenant) data is used as part of the service, and/or the customer (tenant) has some shared responsibility over implementation of the control.	Do you have a capability to allow creation of unique encryption keys per tenant?	X			On Demand
		EKM-02.2		Do you have a capability to manage encryption keys on behalf of tenants?	X			Cryptography processes cover several aspects: intransit and at rest, we have policies that define the life cycle and management of encryption keys. WK - PKI Security GBS-STD-1404 WK - Encryption and Key Management GBS-STD-1407
		EKM-02.3		Do you maintain key management procedures?	X			Cryptography processes cover several aspects: intransit and at rest, we have policies that define the life cycle and management of encryption keys. WK - PKI Security GBS-STD-1404 WK - Encryption and Key Management GBS-STD-1407
		EKM-02.4		Do you have documented ownership for each stage of the lifecycle of encryption keys?	X			Cryptography processes cover several aspects: intransit and at rest, we have policies that define the life cycle and management of encryption keys. WK - PKI Security GBS-STD-1404 WK - Encryption and Key Management GBS-STD-1407
		EKM-02.5		Do you utilize any third party/open source/proprietary frameworks to manage encryption keys?	X			We use a market tool (Gemalto/Thales)

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 sensitive data in storage (e.g., file servers, databases, and end-user workstations) and data in transmission (e.g., system interfaces, over public networks, and electronic messaging) as per applicable legal, statutory, and regulatory compliance obligations.	Do you encrypt tenant data at rest (on disk/storage) within your environment?	X			Only on VM Image, on demand we can encrypt storage data or DB (with Transparent Data Encryption)
		EKM-03.2		Do you leverage encryption to protect data and virtual machine images during transport across and between networks and hypervisor instances?	X			Yes, Virtual Machine Images are encrypt at-rest
		EKM-03.3		Do you have documentation establishing and defining your encryption management policies, procedures, and guidelines?	X			Cryptography processes cover several aspects: intransit and at rest, we have policies that define the life cycle and management of encryption keys. WK - PKI Security GBS-STD-1404 WK - Encryption and Key Management GBS-STD-1407
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 consumer or trusted key management provider. Key management and key usage shall be separated duties.	Do you have platform and data appropriate encryption that uses open/validated formats and standard algorithms?	X			Key are managed by our key management platform. Platform adopts appropriate formats and standard encryption algorithms (compliant to the FIPS 140-2 lvl1 standard). Keys are not be stored in the cloud Platform.
		EKM-04.2		Are your encryption keys maintained by the cloud consumer or a trusted key management provider?	X			Key are managed by our key management platform. Platform adopts appropriate formats and standard encryption algorithms (compliant to the FIPS 140-2 lvl1 standard). Keys are not be stored in the cloud Platform.
		EKM-04.3		Do you store encryption keys in the cloud?	X			Our KeyManagement System (where we store encryption keys) is in HA and is locate in our onpremis environment. A DR system is also located in Cluod (AWS), keys are managed only by WK.
		EKM-04.4		Do you have separate key management and key usage duties?	X			Our KeyManagement System (where we store encryption keys) is in HA and is locate in our onpremis environment. A DR system is also located in Cluod (AWS), keys are managed only by WK.
Governance and Risk Management *Baseline Requirements*	GRM-01	GRM-01.1	Baseline security requirements shall be established for developed or acquired, organizationally-owned or managed, physical or virtual, applications and infrastructure system, and network components that comply with applicable legal, statutory, and regulatory compliance obligations. Deviations from standard baseline configurations must be authorized following change management policies and procedures prior to deployment, provisioning, or use. Compliance with security baseline requirements must be reassessed at least annually unless an alternate frequency has been established and authorized based on business needs.	Do you have documented information security baselines for every component of your infrastructure (e.g., hypervisors, operating systems, routers, DNS servers, etc.)?	X			Policy and Standards are adopted in the configuration of infrastructure elements. WK - Server Hardening GBS-STD-1415
		GRM-01.2		Do you have the capability to continuously monitor and report the compliance of your infrastructure against your information security baselines?	X			Measures and controls are in place to keep the infrastructure in line with our security baseline information.
Governance and Risk Management *Risk Assessments*	GRM-02	GRM-02.1	Risk assessments associated with data governance requirements shall be conducted at planned intervals and shall consider the following: • Awareness of where sensitive data is stored and transmitted across applications, databases, servers, and network infrastructure • Compliance with defined retention periods and end-of-life disposal requirements • Data classification and protection from unauthorized use, access, loss, destruction, and falsification	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			The RA framework considers the processing of data
		GRM-02.2		Do you conduct risk assessments associated with data governance requirements at least once a year?	X			Last one has been carried out in 2019. This year is ongoing, due to ISO27001 Process.
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			Senior Management defines the principles and values followed by the company, including security guidelines. For each employee is required to complete periodic generic security training (other than role-specific training). Compliance audits and tests are conducted to verify that employees understand and follow the defined policies.
Governance and Risk Management *Management Program*	GRM-04	GRM-04.1	An Information Security Management Program (ISMP) shall be developed, documented, approved, and implemented that includes administrative, technical, and physical safeguards to protect assets and data from loss, misuse, unauthorized access, disclosure, alteration, and destruction. The security program shall include, but not be limited to, the following areas insofar as they relate to the characteristics of the business: • Risk management • Security policy • Organization of information security • Asset management • Human resources security • Physical and environmental security • Communications and operations management • Access control • Information systems acquisition, development, and maintenance	Do you provide tenants with documentation describing your Information Security Management Program (ISMP)?	X			Confidential documents shared only on demand, with NDA signature
		GRM-04.2		Do you review your Information Security Management Program (ISMP) at least once a year?	X			The information security management program is reviewed at least annually by Global Information Security team and it is in compliance with ISO27001 standards.
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			WK has adopted a Security maturity program defined in 5 basic pillars on information security. At least annually an Audit is performed for each KPI defined per pillar and a score and an improvement plan defined for the following year.
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 organization's business leadership (or other accountable business role or function) and supported by a strategic business plan and an information security management program inclusive of defined information security roles and responsibilities for business leadership.	Are your information security policies and procedures made available to all impacted personnel and business partners, authorized by accountable business role/function and supported by the information security management program as per industry best practices (e.g. ISO 27001, SOC 2)?	X			All documentation relating to security policies and procedures is available upon request.
		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			There is a special committee that manages, discuss and review the company's security policy and procedures. Policies and procedures are approved by top management.
		GRM-06.3		Do you have agreements to ensure your providers adhere to your information security and privacy policies?	X			Partner and Suppliers meet contractual requirements in order to be in line with WK's security policies, additional checks will be carried out to verify compliance if necessary. "WK - Information Security Standards for WK Suppliers-STD-1203a.pdf"
		GRM-06.4		Can you provide evidence of due diligence mapping of your controls, architecture, and processes to regulations and/or standards?	X			A Global Independent Information Security Department exists, develops IT Security plans and strategy and is responsible for maintaining information security policies, standards, and procedures. All Key roles and responsibilities pertaining to the IT organization are defined, documented, formally assigned, communicated, reviewed and approved by management. An IT governance framework is established which outlines the charter, scope, roles and responsibilities of stakeholders and oversight and functional committees within global organization and local business units.
		GRM-06.5		Do you disclose which controls, standards, certifications, and/or regulations you comply with?	X			Part of this information: controls, standards, certifications and regulations with which WK is compliant are company confidential, and shared only on demand with NDA signature.
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 security policies and procedures. Employees shall be made aware of what action might be taken in the event of a violation, and disciplinary measures must be stated in the policies and procedures.	Is a formal disciplinary or sanction policy established for employees who have violated security policies and procedures?	X			Wolters Kluwer sanctions any workforce member in violation of security privacy and security policies and procedures, whether the violation was intentional or unintentional. The type of sanction depends on the context which includes relevant legislation, business contracts, customer impact, intent and/or the individual and the severity of the violation. Sanctions include, but are not limited to, re-training, verbal and written warnings and/or termination of employment. WK - Global IT Security GBS-POL-1001-jun 2020
		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			The GlobalSecurity policy defines that disciplinary measures must be taken. Employees who violate security standards or policies are subject to investigation and disciplinary procedure as required by law or contract of employment.

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**			Policies, procedures and basic security standards are reviewed at least once a year
Governance and Risk Management *Policy Reviews*	GRM-09	GRM-09.1	The organization's business leadership (or other accountable business role or function) shall review the information security policy at planned intervals or as a result of changes to the organization to ensure its continuing alignment with the security strategy, effectiveness, accuracy, relevance, and applicability to legal, statutory, or regulatory compliance obligations.	Do you notify your tenants when you make material changes to your information security and/or privacy policies?	**X**			Confidential documents shared only on demand with NDA signature
		GRM-09.2		Do you perform, at minimum, annual reviews to your privacy and security policies?	**X**			Policies, procedures and basic security standards are reviewed at least once a year
Governance and Risk Management *Assessments*	GRM-10	GRM-10.1	Aligned with the enterprise-wide framework, formal risk assessments shall be performed at least annually or at planned intervals, (and in conjunction with any changes to information systems) to determine the likelihood and impact of all identified risks using qualitative and quantitative methods. The likelihood and impact associated with inherent and residual risk shall be determined independently, considering all risk categories (e.g., audit results, threat and vulnerability analysis, and regulatory compliance).	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**			A formal risk assessments is performed at least annually.
		GRM-10.2		Is the likelihood and impact associated with inherent and residual risk determined independently, considering all risk categories?	**X**			The Risk Assessments is performed on a standard framework. WK - Risk Management GBS-STD-1204
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 documented in accordance with reasonable resolution time frames and stakeholder approval.	Do you have a documented, organization-wide program in place to manage risk?	**X**			A dedicated Department manages this scope
		GRM-11.2		Do you make available documentation of your organization-wide risk management program?	**X**			Confidential documents shared on demand with NDA signature
Human Resources *Asset Returns*	HRS-01	HRS-01.1	Upon termination of workforce personnel and/or expiration of external business relationships, all organizationally-owned assets shall be returned within an established period.	Upon termination of contract or business relationship, are employees and business partners adequately informed of their obligations for returning organizationally-owned assets?	**X**			All Information Systems provided to Users, such as computing devices, mobile devices, mobile storage, and similar devices, must be returned upon termination of employment or entering into a new assignment within Wolters Kluwer or, for Users who are not employees, conclusion of the project or engagement that requires such access and, in any event, upon expiration or termination of the User's relationship with Wolters Kluwer. WK - Acceptable Use GBS-POL-1002
		HRS-01.2		Do you have asset return procedures outlining how assets should be returned within an established period?	**X**			HR and WPT Teams have defined rules for the return of the assets.
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**			Background checks are carried out by normal recruitment procedures, questionnaires and evaluations carried out during interviews; Supplier are subject to a qualification process.
Human Resources *Employment Agreements*	HRS-03	HRS-03.1	Employment agreements shall incorporate provisions and/or terms for adherence to established information governance and security policies and must be signed by newly hired or on-boarded workforce personnel (e.g., full or part-time employee or contingent staff) prior to granting workforce personnel user access to corporate facilities, resources, and assets.	Do your employment agreements incorporate provisions and/or terms in adherence to established information governance and security policies?	**X**			Before accessing any of WK's assets, employee contract's must be signed. New employees must be aware of and comply with all Company policies.
		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 or change in employment procedures shall be assigned, documented, and communicated.	Are documented policies, procedures, and guidelines in place to govern change in employment and/or termination?	**X**			Procedures and controls are adopted with regard to personnel management. When an employee changes jobs or leaves the company, appropriate review or termination actions are taken.
		HRS-04.2		Do the above procedures and guidelines account for timely revocation of access and return of assets?	**X**			Procedures and controls are adopted with regard to personnel management. When an employee changes jobs or leaves the company, appropriate review or termination actions are taken.
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**			According to our policy, no mobile or portable devices other than production systems can contain customer data. Customer (or our legal department) may authorize it - if necessary. In this case, the transfer must take place according to specific rules, must be encrypted and processed only for the time strictly necessary to perform activities and then deleted from temporary mobile device.
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**			Requirements for non-disclosure or confidentiality agreements regarding data protection and operational details for data management are identified, documented and reviewed at scheduled intervals.
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**			As per contractual agreements with the client, all the details of responsibilities and roles are provided. In addition to the "nomina a responsabile al trattamento" for the SaaS services, WK transmits the updated list of system administrators to customers upon request.
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 and incorporated as appropriate.	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**			Wolters Kluwer permits the use of and access to Information Systems to assist Users in conducting business for or on behalf of Wolters Kluwer. Limited incidental personal use is permitted, Users may access and use only those Information Systems that the User has been granted authorization to by an applicable policy of Wolters Kluwer, or by the User's manager or supervising contact at Wolters Kluwer ("WK Supervisor") in accordance with Policy "WK - Acceptable Use GBS-POL-1002"
		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 appropriate. All individuals with access to	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**			WK employees are required to complete training on a regular basis, employees with specific technical role or who are managing or processing data are also required to follow specific
		HRS-09.2		Do you specifically train your employees regarding their specific role and the information security controls they must fulfill?	**X**			
		HRS-09.3		Do you document employee acknowledgment of training they have completed?	**X**			

		HRS-09.4	organizational data shall receive appropriate awareness training and regular updates in organizational procedures, processes, and policies relating to their professional function relative to the organization.	Is successful and timed completion of the training program(s) considered a prerequisite for acquiring and maintaining access to sensitive systems?	x			managing or processing data are also required to follow specific trainings on the security requirements to be adopted. WK- Application Security Training GBS-STD-1002
		HRS-09.5		Are personnel trained and provided with awareness programs at least once a year?	x			
		HRS-09.6		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 and responsibilities for: • Maintaining awareness and compliance with established policies and procedures and applicable legal, statutory, or regulatory compliance obligations. • Maintaining a safe and secure working environment	Are personnel informed of their responsibilities for maintaining awareness and compliance with published security policies, procedures, standards, and applicable regulatory requirements?	x			WK gives clear indications on the understanding of its role and responsibilities through tools managed by the HR team. For new recruits, there are starterkits and induction programs according to their role, as well as publications on the Intranet. Managers ensure that the procedures are implemented in accordance with the standards defined at the company level. WK provides continuous training to consolidate its knowledge of information security.
		HRS-10.2		Are personnel informed of their responsibilities for maintaining a safe and secure working environment?	x			
		HRS-10.3		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 shall be established to require that unattended workspaces do not have openly visible (e.g., on a desktop) sensitive documents and user computing sessions had been disabled after an established period of inactivity.	Are all computers and laptops configured such that there is lockout screen after a pre-defined amount of time?	x			All the devices are configured according to predefined security policies WK - EUC System Security GBS-STD-1300 WK - Mobile Device Security GBS-STD-1303 Workplace Technology Technical Standards
		HRS-11.2		Are there policies and procedures to ensure that unattended workspaces do not have openly visible (e.g., on a desktop) sensitive documents?	x			All the devices are configured according to predefined security policies WK - EUC System Security GBS-STD-1300 WK - Mobile Device Security GBS-STD-1303 Workplace Technology Technical Standards
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 to prevent compromise and misuse of log data.	Do you restrict, log, and monitor access to your information security management systems (e.g., hypervisors, firewalls, vulnerability scanners, network sniffers, APIs, etc.)?	x			Access control, logging and security measures have been taken, as required by our security policies. WK - Security Logging and Monitoring GBS -STD-1408
		IAM-01.2		Do you monitor and log privileged access (e.g., administrator level) to information security management systems?	x			Access control, logging and security measures have been taken, as required by our security policies. WK - Security Logging and Monitoring GBS -STD-1408
Identity & Access Management *User Access Policy*	IAM-02	IAM-02.1	User access policies and procedures shall be established, and supporting business processes and technical measures implemented, for ensuring appropriate identity, entitlement, and access management for all internal corporate and customer (tenant) users with access to data and organizationally-owned or managed (physical and virtual) application interfaces and infrastructure network and systems components. These policies, procedures, processes, and measures must incorporate the following: • Procedures, supporting roles, and responsibilities for provisioning and de-provisioning user account entitlements following the rule of least privilege based on job function (e.g., internal employee and contingent staff personnel changes, customer-controlled access, suppliers' business relationships, or other third-party business relationships) • Business case considerations for higher levels of assurance and multi-factor authentication secrets (e.g., management interfaces, key generation, remote access, segregation of duties, emergency access, large-scale provisioning or geographically-distributed deployments, and personnel redundancy for critical systems) • Access segmentation to sessions and data in multi-tenant architectures by any third party (e.g., provider and/or other customer (tenant) • Identity trust verification and service-to-service application (API) and information processing interoperability (e.g., SSO and federation) • Account credential lifecycle management from instantiation through revocation • Account credential and/or identity store minimization or re-use when feasible • Authentication, authorization, and accounting (AAA) rules for access to data and sessions (e.g., encryption and strong/multi-factor, expireable, non-shared authentication secrets) • Permissions and supporting capabilities for customer (tenant) controls over authentication, authorization, and accounting (AAA) rules for access to data and sessions • Adherence to applicable legal, statutory, or regulatory compliance requirements **Requirements in bullet points 4 to 7 are covered in IAM-12 questions.*	Do you have controls in place ensuring timely removal of systems access that is no longer required for business purposes?	x			A review process and - if necessary - a removal process of authorization profiles is in place and is owned by the system administrator.
		IAM-02.2		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			Access to data is limited as required by the GDPR regulation
		IAM-02.3		Do you have procedures and technical measures in place for user account entitlement de-/provisioning based on the rule of least privilege?	x			A review process and - if necessary - a removal process of authorization profiles is in place and is owned by the system administrator.
		IAM-02.4		Do you have procedures and technical measures in place for data access segmentation in multi-tenant system architectures?	x			The SaaS service provides logical segregation of customer data, in order to reserve access to the data exclusively to individual users of the customer.
		IAM-02.5		Do you enforce data access permissions based on the rules of Authentication, Authorization and Accountability (AAA)?	x			Authentication and Authorization are supported. For the Accountability, we are able to provide on demand data for the individual customer but not the details for individual user of the customer.
		IAM-02.6		Do your policies and procedures incorporate security controls for establishing higher levels of assurance for critical business case considerations, supported by multifactor authentication?	x			Our policies provide multiple authentication factor base on data processing Type
		IAM-02.7		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			Requests to change the access profile are tracked using the incident/request management tool. On customer's request we can provide all the details of these operations.
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			Access to the diagnostic and configuration ports is enabled only for system administrators
Identity & Access Management *Policies and Procedures*	IAM-04	IAM-04.1	Policies and procedures shall be established to store and manage identity information about every person who accesses IT infrastructure and to determine their level of access. Policies shall also be developed to control access to network resources based on user identity.	Do you manage and store the identity of all personnel who have access to the IT infrastructure, including their level of access?	x			Procedures have been put in place to register the identities of employees with their access roles to the systems and their level of authorization. WK - Account and Access Management - GBS-STD-1417
		IAM-04.2		Do you manage and store the user identity of all personnel who have network access, including their level of access?	x			Procedures have been put in place to register the identities of employees with their access roles to the systems and their level of authorization. WK - Account and Access Management - GBS-STD-1418
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			The agreement is contractually defined and WK with its suppliers is responsible for the management of the infrastructure and the platform, the customer for access to the service and management of its data.
Identity & Access Management *Source Code Access Restriction*	IAM-06	IAM-06.1	Access to the organization's own developed applications, program, or object source code, or any other form of intellectual property (IP), and use of proprietary software shall be appropriately restricted following the rule of least privilege based on job function as per established user access policies and procedures.	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			Access to data centers and offices are controlled and monitored. There is a physical segregation between the development environments (where the code sources are stored) and the testing environments (where the data is collected with data that does not come from production environments) with respect to the production environment where the services are provided. To protect customer data in the external perimeter there are firewalls, IDS and IPS. Procedures and processes are defined to guarantee access through individual logical access to the areas where information or systems are managed and stored only to authorized users obliged to respect the confidentiality of information.
		IAM-06.2		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 posed by business processes requiring third-party access to the organization's information systems and data shall be followed by coordinated application of resources to minimize, monitor, and measure likelihood and impact of unauthorized or inappropriate access. Compensating controls derived from the risk analysis shall be implemented prior to provisioning access.	Does your organization conduct third-party unauthorized access risk assessments?	X			The Security program includes penetration testing activities carried out annually by a third party authorized by us.
		IAM-07.2		Are preventive, detective corrective compensating controls in place to mitigate impacts of unauthorized or inappropraite access?	X			Password credentials must follow specific complexities defined in the password policy, optionally we can adopt MFA. As an additional compensation measure we perform penetration testing activities at least annually.
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 ensure identities are only accessible based on rules of least privilege and replication limitation only to users explicitly defined as business necessary.	Do you document how you grant, approve and enforce access restrictions to tenant/customer credentials following the rules of least privilege?	X			Data access credentials are self managed by Customers according to the roles provided by the application, appropriately documented in the application manual.
		IAM-08.2		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			The credentials are encrypted and cannot be viewed by system administrators; access to the customer's data is provided only with customer (or Legal department) authorization in cases of need or emergency.
		IAM-08.3		Do you limit identities' replication only to users explicitly defined as business necessary?	X			Access credentials are subjectively assigned to an individual. Replication of usernames is not allowed, a user may have multiple unique usernames.
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 organizationally-owned or managed (physical and virtual) applications, infrastructure systems, and network components shall be authorized by the organization's management prior to access being granted and appropriately restricted as per established policies and procedures. Upon request, provider shall inform customer (tenant) of this user access, especially if customer (tenant) data is used as part of the service and/or customer (tenant) has some shared responsibility over implementation of control.	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			A credential release process subject to approval processes is in place.
		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			Access requests must always be authorised by the manager (or customer or Legal Department), before credential are released to the end user.
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 leadership or other accountable business role or function supported by evidence to demonstrate the organization is adhering to the rule of least privilege based on job function. For identified access violations, remediation must follow established user access policies and procedures.	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			Periodic checks are carried out on the authorisations granted to administrative users.
		IAM-10.2		Do you collect evidence to demonstrate that the policy (see question IAM-10.1) has been enforced?	X			Yes, periodic checks are made by internal report, evidende or issue collected an managed.
		IAM-10.3		Do you ensure that remediation actions for access violations follow user access policies?	X			All changes to user permissions are recorded, and if necessary revoked when access is no longer required.
		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			In case of unauthorized access to customer data will be activated the data breach procedure that provides information to the customer of the analysis of the incident.
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 managed (physical and virtual) applications, infrastructure systems, and network components, shall be implemented as per established policies and procedures and based on user's change in status (e.g., termination of employment or other business relationship, job change, or transfer). Upon request, provider shall inform customer (tenant) of these changes, especially if customer (tenant) data is used as part the service and/or customer (tenant) has some shared responsibility over implementation of control.	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			The control of the users of the SAAS service is managed directly by the customer. WK adopts procedures and processes for employees and business partners, in order to review and revoke user accesses when necessary. WK - Account and Access Management - GBS-STD-1417
		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 be restricted as per the following, ensuring appropriate identity, entitlement, and access management and in accordance with established policies and procedures: • Identity trust verification and service-to-service application (API) and information processing interoperability (e.g., SSO and Federation) • Account credential lifecycle management from instantiation through revocation • Account credential and/or identity store minimization or re-use when feasible • Adherence to industry acceptable and/or regulatory compliant authentication, authorization, and accounting (AAA) rules (e.g., strong/multi-factor, expireable, non-shared authentication secrets)	Do you support use of, or integration with, existing customer-based Single Sign On (SSO) solutions to your service?	X			It is offered as an Option
		IAM-12.2		Do you use open standards to delegate authentication capabilities to your tenants?	X			SAML is offered as an Option
		IAM-12.3		Do you support identity federation standards (e.g., SAML, SPML, WS-Federation, etc.) as a means of authenticating/authorizing users?	X			SAML is offered as an Option
		IAM-12.4		Do you have a Policy Enforcement Point capability (e.g., XACML) to enforce regional legal and policy constraints on user access?		X		Enforcement Point Policy features are not integrated in our authentication modes.
		IAM-12.5		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		Authorization profiling of the users is allowed in application.
		IAM-12.6		Do you provide tenants with strong (multifactor) authentication options (e.g., digital certs, tokens, biometrics, etc.) for user access?	X			It is offered as an Option
		IAM-12.7		Do you allow tenants to use third-party identity assurance services?		X		There are no integrations with third-party identity assurance systems (e.g. spid or google identity).
		IAM-12.8		Do you support password (e.g., minimum length, age, history, complexity) and account lockout (e.g., lockout threshold, lockout duration) policy enforcement?	X			Password Settings are managed by WK in accordance with our policy WK - Password Management GBS-STD-1409
		IAM-12.9		Do you allow tenants/customers to define password and account lockout policies for their accounts?	X			Password Settings are managed by WK in accordance with our policy WK - Password Management GBS-STD-1409
		IAM-12.10		Do you support the ability to force password changes upon first logon?	X			Password Settings are managed by WK in accordance with our policy WK - Password Management GBS-STD-1410

		IAM-12.11		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			Password Settings are managed by WK in accordance with our policy WK - Password Management GBS-STD-1409
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			Access utility programs appropriately restricted and monitored are used to manage VM, in line with ISO 27001 standards.
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 in the event of a security breach.	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			Yes, in accordance to our policy WK - Intrusion Detection System Security GBS-STD-1413
		IVS-01.2		Is physical and logical user access to audit logs restricted to authorized personnel?	x			Yes in accordance with our policy WK - Security Logging and Monitoring GBS -STD-1408
		IVS-01.3		Can you provide evidence that due diligence mapping of regulations and standards to your controls/architecture/processes has been performed?	x			SOC1 and SOC2 Reports Type II are available
		IVS-01.4		Are audit logs centrally stored and retained?	x			Yes in accordance to our policy WK - Security Logging and Monitoring GBS -STD-1408
		IVS-01.5		Are audit logs reviewed on a regular basis for security events (e.g., with automated tools)?	x			The monitoring will be completed during 2020 with implementation of a SOC (Security Operation Team)
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 move of an image and the subsequent validation of the image's integrity must be immediately available to customers through electronic methods (e.g., portals or alerts).	Do you log and alert any changes made to virtual machine images regardless of their running state (e.g., dormant, off or running)?	x			Yes, in accordance to our security policy: WK - Security Logging and Monitoring GBS -STD-1408
		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			On customer's request
		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		Contract signed by the customer for the service guarantees an SLA of service availability, in case of particular maintenance activities of this type carried out by WK, the customer is not informed.
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, statutory, and regulatory compliance obligations. Projections of future capacity requirements shall be made to mitigate the risk of system overload.	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			Resources used by the systems are distributed and shared by the machines, in order to support the required workload with a certain safety margin.
		IVS-04.2		Do you restrict use of the memory oversubscription capabilities present in the hypervisor?	x			Resources used by the systems are distributed and shared by the machines, in order to support the required workload with a certain safety margin.
		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			Resources used by the systems are distributed and shared by the machines, in order to support the required workload with a certain safety margin.
		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			Monitoring systems are in place to ensure that the regulatory and contractual requirements for service delivery are continuously met.
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			Penetration testing, and vulnerability scanning to detect, mitigate, and resolve security issues are periodicaly performed. We have the ability to scan various types of Virtualization technologies, (e.g. containers).
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 configurations shall be reviewed at least annually, and supported by a documented justification for use for all allowed services, protocols, ports, and compensating controls.	For your IaaS offering, do you provide customers with guidance on how to create a layered security architecture equivalence using your virtualized solution?			x	We do not offer this service
		IVS-06.2		Do you regularly update network architecture diagrams that include data flows between security domains/zones?	x			As required by our ISO 27001 processes, the basic network architecture is regularly checked and updated.
		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			As required by our ISO 27001 processes, the basic network architecture is regularly checked and updated.
		IVS-06.4		Are all firewall access control lists documented with business justification?	x			The rules defined in the firewall are mainly based on architecture documents, which are updated on an annual basis with the revisions occurred and tracked during the year by Request management systems.
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			Yes in accordance to our security policy: WK - Server Hardening GBS-STD-1415
Infrastructure & Virtualization Security *Production / Non-Production Environments*	IVS-08	IVS-08.1	Production and non-production environments shall be separated to prevent unauthorized access or changes to information assets. Separation of the environments may include: stateful inspection firewalls, domain/realm authentication sources, and clear segregation of duties for personnel accessing these environments as part of their job duties.	For your SaaS or PaaS offering, do you provide tenants with separate environments for production and test processes?	x			Test environments are physically segregated from those of production, on request we can provide to customer a test environment.
		IVS-08.2		For your IaaS offering, do you provide tenants with guidance on how to create suitable production and test environments?			x	We do not offer this service

		IVS-08.3		Do you logically and physically segregate production and non-production environments?	X			Test environments are physically segregated from those of production.
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 appropriately segmented from other tenant users, based on the following considerations: • Established policies and procedures • Isolation of business critical assets and/or sensitive user data and sessions that mandate stronger internal controls and high levels of assurance • Compliance with legal, statutory, and regulatory compliance obligations	Are system and network environments protected by a firewall or virtual firewall to ensure business and customer security requirements?	X			Yes in accordance to our security policy: WK - Network Information Security GBS-STD-1402.pdf WK - Firewall Security Config and Management GBS-STD-1405
		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			Yes in accordance to our security policy: WK - Network Information Security GBS-STD-1402.pdf WK - Firewall Security Config and Management GBS-STD-1406
		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	Customers are not allowed to access the infrastructure
		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			We have the ability to logically segment and encrypt customer data at rest.
		IVS-09.5		Are system and network environments protected by a firewall or virtual firewall to ensure protection and isolation of sensitive data?	X			System environments and Network are protected by firewalls in order to meet legislative, regulatory and contractual security and compliance requirements. The same guarantee the separation of production environments from those of non-production to ensure the protection and isolation of sensitive data.
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			In the SAAS services we do not provide a service of "migrating physical servers, applications, or data to virtual servers". Data import operations take place via secure protocol and in network areas segregated from those of test or development environments.
		IVS-10.2		Do you use a network segregated from production-level networks when migrating physical servers, applications, or data to virtual servers?	X			
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			SAAS services do not require the customer access to server infrastructure. Administrators access the infrastructure with the application of the minimum privilege.
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 • Security settings enabled with strong encryption for authentication and transmission, replacing vendor default settings (e.g., encryption keys, passwords, and SNMP community strings) • User access to wireless network devices restricted to authorized personnel • The capability to detect the presence of unauthorized (rogue) wireless network devices for a timely disconnect from the network	Are policies and procedures established and mechanisms configured and implemented to protect the wireless network environment perimeter and to restrict unauthorized wireless traffic?			X	Policies and measures to regulate wireless networks exist and are applied, in WK network infrastructures, in SAAS service is not expected to use this technology. WK - Network Information Security GBS-STD-1402
		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	
		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	
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. Technical measures shall be implemented and shall apply defense-in-depth techniques (e.g., deep packet analysis, traffic throttling, and black-holing) for detection and timely response to network-based attacks associated with anomalous ingress or egress traffic patterns (e.g., MAC spoofing and ARP poisoning attacks) and/or distributed denial-of-service (DDoS) attacks.	Do your network architecture diagrams clearly identify high-risk environments and data flows that may have legal compliance impacts?	X			
		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			Network architecture diagrams highlight high-risk environments and data flows that could impact legal compliance. Process procedures and risk containment or defensive measures are adopted in order to promptly mitigate security events.
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			The unstructured customer data contained in the SAAS Service environment is available in the following formats: .csv, .pdf, .xls, .doc, flat file, or other formats. The massive data extraction takes place upon termination of the contract or on the basis of customer need.
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-to-service application (API) and information processing interoperability, and portability for application development and information exchange, usage, and integrity persistence.	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			Gli SLA che afferiscono ai servizi SAAS sono stabiliti contrattualmente.
		IPY-03.2		If using virtual infrastructure, do you allow virtual machine images to be downloaded and ported to a new cloud provider?		X		The images are encrypted so they would not be usable, in case of termination of contract there is a data portability protocol.
		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			Customer contact defines how and the SLAs of data portability in a standard format
Interoperability & Portability *Standardized Network Protocols*	IPY-04	IPY-04.1	The provider shall use secure (e.g., non-clear text and authenticated) standardized network protocols for the import and export of data and to manage the service, and shall make available a document to consumers (tenants) detailing the relevant interoperability and portability standards that are involved.	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			The applications offered in the SAAS service have documented data import and export functionalities through secure interfaces. The SAAS environment provides encryption in transit for data transmission, the customer must take measures to encrypt the data that will be transmitted.
		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, and shall have documented custom changes made to any hypervisor in use, and all solution-specific virtualization hooks, available for customer review.	Do you use an industry-recognized virtualization platform and standard virtualization formats (e.g., OVF) to help ensure interoperability?			X	We do not offer this service
		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	We do not offer this service
		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	We do not offer this service
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			The training includes specific topics of use of mobile devices. A BlackList software policy is provided to all employees. There is a specific policy that covers topics related to mobile devices that also includes the BYOD paradigm. All assets are surveyed according to our asset management policies. WK - Mobile Device Security GBS-STD-1303 WK - Blocked Applications List GBS-GDL-1300 WK - IT Awareness and Training GBS-STD-1205 WK - Asset Management GBS-STD-1201.pdf
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			
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			
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	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			
Mobile Security *Jailbreaking and Rooting*	MOS-12	MOS-12.1	The mobile device policy shall prohibit the circumvention of built-in security controls on mobile devices (e.g., jailbreaking or rooting) and is enforced through detective and preventative controls on the device or through a centralized device management system (e.g., mobile device management).	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 litigation, e-discovery, and legal holds. The BYOD policy shall clearly state the expectations over the loss of non-company data in the case that a wipe of the device is required.	Does your BYOD policy clearly define the expectation of privacy, requirements for litigation, e-discovery, and legal holds?	X			
		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			
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			
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 through technical controls on all company devices or devices approved for BYOD usage, and shall prohibit the changing of password/PIN lengths and authentication requirements.	Do you have password policies for enterprise issued mobile devices and/or BYOD mobile devices?	X			
		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 of data, prohibit the usage of unapproved application stores, and require the use of anti-malware software (where supported).	Do you have a policy that requires BYOD users to perform backups of specified corporate data?	X			
		MOS-17.2		Do you have a policy that requires BYOD users to prohibit the usage of unapproved application stores?	X			
		MOS-17.3		Do you have a policy that requires BYOD users to use anti-malware software (where supported)?	X			
Mobile Security *Remote Wipe*	MOS-18	MOS-18.1	All mobile devices permitted for use through the company BYOD program or a company-assigned mobile device shall allow for remote wipe by the company's corporate IT or shall have all company-provided data wiped by the company's corporate IT.	Does your IT provide remote wipe or corporate data wipe for all company-accepted BYOD devices?	X			
		MOS-18.2		Does your IT provide remote wipe or corporate data wipe for all company-assigned mobile devices?	X			
Mobile Security *Security Patches*	MOS-19	MOS-19.1	Mobile devices connecting to corporate networks or storing and accessing company information shall allow for remote software version/patch validation. All mobile devices shall have the latest available security-related patches installed upon general release by the device manufacturer or carrier and authorized IT personnel shall be able to perform these updates remotely.	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 *Users*	MOS-20	MOS-20.1	The BYOD policy shall clarify the systems and servers allowed for use or access on a BYOD-enabled device.	Does your BYOD policy clarify the systems and servers allowed for use or access on the BYOD-enabled device?	X			
		MOS-20.2		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 teams monitors a variety of communication channels for security incidents. Personnel inform and promptly react to known incidents/vulnerability.
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 management, as per established IT service management policies and procedures.	Do you have a documented security incident response plan?	X			WK has procedures and plans for incident response in place. Wolters Kluwer Cyber Security Incident Response Plan (CSIRP)
		SEF-02.2		Do you integrate customized tenant requirements into your security incident response plans?	X			WK has procedures and plans for incident response in place. Wolters Kluwer Cyber Security Incident Response Plan (CSIRP)
		SEF-02.3		Do you publish a roles and responsibilities document specifying what you vs. your tenants are responsible for during security incidents?	X			WK has confidential procedures and plans for incident response in place that shared on request. However, a document is published that summarizes in general the roles and responsibilities in the case of security incidents
		SEF-02.4		Have you tested your security incident response plans in the last year?	X			WK has procedures and plans for incident response in place. Wolters Kluwer Cyber Security Incident Response Plan (CSIRP)
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 to report all information security events in a timely manner. Information security events shall be reported through predefined communications channels in a timely manner adhering to applicable legal, statutory, or regulatory compliance obligations.	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			Any information security event that could lead to an alleged data breach must follow the procedure set out in the security incident management plan
		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			Comunication about security incident is provided through Incident/Problem Mangement tool.
Security Incident Management, E-Discovery, & Cloud Forensics *Incident Response Legal Preparation*	SEF-04	SEF-04.1		Does your incident response plan comply with industry standards for legally admissible chain-of-custody management processes and controls?	X			WK has procedures and plans for incident response that comply with industry standards, ISO/IEC 270351_2016 NIST.SP.800-61r2. Wolters Kluwer Cyber Security Incident Response Plan (CSIRP)

		SEF-04.2	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 as is legally permissible in the forensic investigation.	Does your incident response capability include the use of legally admissible forensic data collection and analysis techniques?	X			The safety incident management process includes the freezing and storage of impacted systems at the time of incident detection in order to be able to perform forensic analysis in case of need.
		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			Everything that is logically segregated for each tenant yes, if whole parts of INFRA have to be frozen (Firewall, Database or NetScaler) could impact service delivery.
		SEF-04.4		Do you enforce and attest to tenant data separation when producing data in response to legal subpoenas?	X			There is a logical separation of tenants and data content.
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			A monthly report submetted tothe management provides evidence of security incidents that have been quantified and analyzed by the IT Security Group.
		SEF-05.2		Will you share statistical information for security incident data with your tenants upon request?	X			Confidential documents shared only on demand with NDA signature
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 mitigate and contain data security risks through proper separation of duties, role-based access, and least-privilege access for all personnel within their supply chain.	Do you inspect and account for data quality errors and associated risks, and work with your cloud supply-chain partners to correct them?	X			Access and modification logs as well as recording activities in incident management tool are adopted in order to allow data quality correction.
		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			the limited number of FTEs working on the platform does not allow a physical segregation of tasks, but controls are implemented to mitigate and contain data security for risks, for example replicate logical credential only if needed, assign least-privileged, monitor use of credential
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			Confidential company documents shared only on demand with NDA signature
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 infrastructure network and systems components, shall be designed, developed, and deployed in accordance with mutually agreed-upon service and capacity-level expectations, as well as IT governance and service management policies and procedures.	Do you collect capacity and use data for all relevant components of your cloud service offering?	X			Capabilities and usage data are managed in line with the principles defined by our standards.
		STA-03.2		Do you provide tenants with capacity planning and use reports?	X			On demand
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			Annual internal assessments of compliance and effectiveness of policies, procedures, support measures and supporting metrics are conducted in line with our standards.
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 effectively governance, risk management, assurance and legal, statutory and regulatory compliance obligations by all impacted business relationships • Notification and/or pre-authorization of any changes controlled by the provider with customer (tenant) impacts • Timely notification of a security incident (or confirmed breach) to all customers (tenants) and other business relationships impacted (i.e., up- and down-stream impacted supply chain) • Assessment and independent verification of compliance with agreement provisions and/or terms (e.g., industry-acceptable certification, attestation audit report, or equivalent forms of assurance) without posing an unacceptable business risk of exposure to the organization being assessed • Expiration of the business relationship and treatment of customer (tenant) data impacted • Customer (tenant) service-to-service application (API) and data interoperability and portability requirements for application development and information exchange, usage, and integrity persistence	Do you select and monitor outsourced providers in compliance with laws in the country where the data is processed, stored, and transmitted?	X			Agreements with third parties is verified from the Legal Department and the Procurement.
		STA-05.2		Do you select and monitor outsourced providers to ensure that they are in compliance with applicable legislation?	X			Agreements with third parties is verified from the Legal Department and the Procurement. The Suppliers follow a procedure of qualification that includes policy and checklist related to security measures that they must accept and apply.
		STA-05.3		Does legal counsel review all third-party agreements?	X			Agreements with third parties are verified from the Legal Department and the Procurement.
		STA-05.4		Do third-party agreements include provision for the security and protection of information and assets?	X			The Suppliers follow a procedure of qualification that includes policy and checklist related to security measures that they must accept and apply.
		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			Backup procedures and recovery mechanisms (contractually defined) are implemented
		STA-05.6		Do you have the capability to restrict the storage of customer data to specific countries or geographic locations?	X			On Demand
		STA-05.7		Can you provide the physical location/geography of storage of a tenant's data upon request?	X			Datacenter located only in Italy
		STA-05.8		Can you provide the physical location/geography of storage of a tenant's data in advance?	X			Datacenter located only in Italy
		STA-05.9		Do you allow tenants to define acceptable geographical locations for data routing or resource instantiation?		X		It is not allowed to enable or disable defined data flows for geographic locations.
		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			WK has procedures and plans for incident response. Wolters Kluwer Cyber Security Incident Response Plan (CSIRP)
		STA-05.11		Do you allow tenants to opt out of having their data/metadata accessed via inspection technologies?			X	We do not offer this service
		STA-05.12		Do you provide the client with a list and copies of all subprocessing agreements and keep this updated?	X			We can provide customers with the list of suppliers and subprocessing agreements on request.

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			Partner and Suppliers meet contractual requirements in order to be in line with WK's security policies, additional checks will be carried out to verify compliance if necessary. "WK - Information Security Standards for WK Suppliers-STD-1203a.pdf"
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) 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.	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			Partner and Suppliers meet contractual requirements in order to be in line with WK's security policies, additional checks will be carried out to verify compliance if necessary. "WK - Information Security Standards for WK Suppliers-STD-1203a.pdf"
		STA-07.2		Do you have the ability to measure and address non-conformance of provisions and/or terms across the entire supply chain (upstream/downstream)?	x			Partner and Suppliers meet contractual requirements in order to be in line with WK's security policies, additional checks will be carried out to verify compliance if necessary. "WK - Information Security Standards for WK Suppliers-STD-1203a.pdf"
		STA-07.3		Can you manage service-level conflicts or inconsistencies resulting from disparate supplier relationships?	x			Partner and Suppliers meet contractual requirements in order to be in line with WK's security policies, additional checks will be carried out to verify compliance if necessary. "WK - Information Security Standards for WK Suppliers-STD-1203a.pdf"
		STA-07.4		Do you provide tenants with ongoing visibility and reporting of your operational Service Level Agreement (SLA) performance?		x		SLAs (Service Level Agreements) of the SAAS service are documented and provided, to customers.
		STA-07.5		Do you make standards-based information security metrics (CSA, CAMM, etc.) available to your tenants?	x			We have a security maturity program, evidence are company confidential documents shared only on demand with NDA signature.
		STA-07.6		Do you provide customers with ongoing visibility and reporting of your SLA performance?	x			SLAs are documented and provided to customers on request
		STA-07.7		Do your data management policies and procedures address tenant and service level conflicts of interests?	x			As contractual agreements and terms of use of the service
		STA-07.8		Do you review all service level agreements at least annually?	x			We verify periodically and at least annually the respect of the SLAs with our suppliers.
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 which their information supply chain depends on.	Do you assure reasonable information security across your information supply chain by performing an annual review?	x			Partner and Suppliers meet contractual requirements in order to be in line with WK's security policies, additional checks will be carried out to verify compliance if necessary. "WK - Information Security Standards for WK Suppliers-STD-1203a.pdf"
		STA-08.2		Does your annual review include all partners/third-party providers upon which your information supply chain depends?	x			
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, records, and services shall undergo audit and review at least annually to govern and maintain compliance with the service delivery agreements.	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			SOC1 and SOC2 Reports Type II are available
		STA-09.2		Do you have external third party services conduct vulnerability scans and periodic penetration tests on your applications and networks?	x			Our security program includes at least 1 penetration test performed by a 3rd party at least once a year. WK - Vulnerability Scanning GBS-STD-1103.pdf
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 organizationally-owned or managed user end-point devices (i.e., issued workstations, laptops, and mobile devices) and IT infrastructure network and systems components.	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			According to our security policy WK - Anti Malware GBS-STD-1301
		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			According to our security policy WK - Anti Malware GBS-STD-1301
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, penetration testing) to ensure the efficiency of implemented security controls. A risk-based model for prioritizing remediation of identified vulnerabilities shall be used. Changes shall be managed through a change management process for all vendor-supplied patches, configuration changes, or changes to the organization's internally developed software. Upon request, the provider informs customer (tenant) of policies and procedures and identified weaknesses especially if customer (tenant) data is used as part the service and/or customer (tenant) has some shared responsibility over implementation of control.	Do you conduct network-layer vulnerability scans regularly as prescribed by industry best practices?	x			According to our security policy WK - Anti Malware GBS-STD-1301
		TVM-02.2		Do you conduct application-layer vulnerability scans regularly as prescribed by industry best practices?	x			According to our security policy WK - Anti Malware GBS-STD-1301
		TVM-02.3		Do you conduct local operating system-layer vulnerability scans regularly as prescribed by industry best practices?	x			According to our security policy WK - Anti Malware GBS-STD-1301
		TVM-02.4		Will you make the results of vulnerability scans available to tenants at their request?	x			Confidential company documents shared only on demand with NDA signature
		TVM-02.5		Do you have a capability to patch vulnerabilities across all of your computing devices, applications, and systems?	x			According to our security policy WK - Anti Malware GBS-STD-1301
		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			On customer's request
Threat and Vulnerability Management *Mobile Code*	TVM-03	TVM-03.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to prevent the execution of unauthorized mobile code, defined as software transferred between systems over a trusted or untrusted network and executed on a local system without explicit installation or execution by the recipient, on organizationally-owned or managed user end-point devices (e.g., issued workstations, laptops, and mobile devices) and IT infrastructure network and systems components.	Is mobile code authorized before its installation and use, and the code configuration checked, to ensure that the authorized mobile code operates according to a clearly defined security policy?			x	We do not offer this service
		TVM-03.2		Is all unauthorized mobile code prevented from executing?			x	We do not offer this service