# Form for the application for prior authorisation, to be transmitted to the competent authority by an institution which intends to outsource to a cloud computing infrastructure for the storage of audit working files

#### Administrative information:

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| Your internal reference:  *[insert your CSSF identification number]* | *Reference of the administration :* |
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Legal name of the entity:

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|  | *Reserved for the administration* |
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Name of the person having reviewed and approved this document:

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|  | *Reserved for the administration* |
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Date of transmission to the competent authority:

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|  | *Reserved for the administration* |
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#### Type of outsourcing to a cloud computing infrastructure:

1. Name of the cloud computing service provider:

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1. Please summarise the roles and responsibilities that have been defined between your institution, the cloud computing service provider and the resource operator where a third party is appointed.

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| a. Who is the resource operator**[[1]](#footnote-1)** ?  1) The approved audit firm (you)  2) A support PFS. Name: *[insert name]*  3) Service provider located abroad (including an entity of the group). Name : *[insert name]*  b. Who is the signatory of the contract with the cloud computing service provider (check one box only and specify, where applicable, the details for item 2)?  1) The approved audit firm (you)  2) A resource operator (if other than you) : *[insert name]* | *Reserved for the administration* |
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1. Which cloud computing services do you intend to use?

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| Name of the products | Resource operator (check one box only and indicate the name of the undertaking for items 2 and 3) | Types (check one or more boxes, if « other », please specify)[[2]](#footnote-2) | *Reserved for the administration* |
|  | 1) The approved audit firm (you)  2) A support FPS. Name : *[insert name]*  3) Service provider located abroad (including an entity of the group). Name : *[insert name]* | IaaS  PaaS  SaaS  Other. Specify : |  |

*Note: Add rows as needed.*

1. Who in Luxembourg are responsible for the solution?

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| *For technical matters:*  Name: *[insert name]*  Function: *[insert function]*  Email: *[insert email]*  Phone number: *[insert phone number]* | *Reserved for the administration* |
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| *For non-technical matters:*  Name: *[insert name]*  Function: *[insert function]*  Email: *[insert email]*  Phone number: *[insert phone number]* |

1. As required by the RCSSF Norms, a risk analysis has been performed in the context of your project of outsourcing to a cloud computing infrastructure. Please submit the following information, which is part of your analysis:

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| a. How do you protect against « lock-in » risk?  *[insert description of the measure]* | *Reserved for the administration* |
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| b. According to your analysis, how does the cloud computing service provider ensure isolation between the environments of its different clients?  *[insert extract of your analysis]* | *Reserved for the administration* |
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| c. According to your analysis, what controls have been put in place by the cloud conputing service provider to restrict as much as possible the access of its employees to client data?  *[insert description of controls]* | *Reserved for the administration* |
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1. Necessary measures that have been put in place to ensure business continuity. In this context, please provide the following information:

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| a. What is the redundancy of the cloud conputing services (check one box only and explain)?  Data and systems are available in a single copy in a data centre  Several copies of the data and systems are available but in the same data centre  Several copies of the data and systems are available, in several data centres, but in the same region (less than 50 km distance)  Several copies of the data and systems are available, in several data centres, located in distant regions (more than 50 km distance)  Other. Please specify:  Explanations : *[insert further details on redundancy and a justification for your choice]* | *Reserved for the administration* |
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| b. What is your back-up soluton (i.e. copy of data at a specific point of time, it is not a replication)? (check the applicable box and explain)  No back-up solution  Back-up of data on the same cloud computing service infrastructure. In this case, the back-ups are :  Located in the same data centres as the production data  Located in a data centre that is distant from the production data, but located in the same region (less than 50 km distance)  Located in a data centre that is distant from the production data, located in another region (more than 50 km distance)  Back-up of data outside the cloud computing infrastructure (for example within your premises or at another cloud computing service provider)  Other. Please specify:  Explanations : *[insert further details on the back-up solution and a justification for your choice]* | *Reserved for the administration* |
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| c. Please provide a short description of your business continuity plan in case the cloud computing infrastructure is suddenly not available for a prolonged period of time (e.g. bankruptcy of the cloud computing service provider)?  *[insert description of the continuity plan]* | *Reserved for the administration* |
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1. Compliance with the following contractual clauses (with the cloud computing service provider) :

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| a. Applicable contract law:  The contract is governed by the law applicable in the following country: *[insert country]* | *Reserved for the administration* |
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| b. Resiliency of services :  The data centres hosting your data and systems are located in the following countries: *[insert countries]* | *Reserved for the administration* |
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| c. Right of audit  *[insert extract of contract]* | *Reserved for the administration* |
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1. Resource operator means the natural or legal person that uses the client interface to manage the cloud computing services. [↑](#footnote-ref-1)
2. IaaS = Infrastructure as a Service / PaaS = Platform as a service / SaaS = Software as a Service [↑](#footnote-ref-2)