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Information technology — Security techniques — Code of practice for PII protection in public cloud acting as PII processors

Technologies de l'information — Techniques de sécurité — Code de pratique pour la protection PII dans les nuages publics agissant comme des processeurs PII

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Foreword

ISO (the International Organization for Standardization) and IEC (the International Electrotechnical Commission) form the specialized system for worldwide standardization. National bodies that are members of ISO or IEC participate in the development of International Standards through technical committees established by the respective organization to deal with particular fields of technical activity. ISO and IEC technical committees collaborate in fields of mutual interest. Other international organizations, governmental and non-governmental, in liaison with ISO and IEC, also take part in the work. In the field of information technology, ISO and IEC have established a joint technical committee, ISO/IEC JTC 1.

International Standards are drafted in accordance with the rules given in the ISO/IEC Directives, Part 2.

The main task of the joint technical committee is to prepare International Standards. Draft International Standards adopted by the joint technical committee are circulated to national bodies for voting. Publication as an International Standard requires approval by at least 75 % of the national bodies casting a vote.

Attention is drawn to the possibility that some of the elements of this document may be the subject of patent rights. ISO and IEC shall not be held responsible for identifying any or all such patent rights.

ISO/IEC 27018 was prepared by Joint Technical Committee ISO/IEC JTC 1, *Information technology*, Subcommittee SC 27, *Security techniques*.

0 Introduction

0.1 Background and context

Cloud service providers who process personally identifiable information (PII) under contract to their customers have to operate their services in ways that allow both parties to meet the requirements of applicable legislation and regulations covering the protection of PII. The requirements and the way in which the requirements are divided between the cloud service provider and its customers vary according to legal jurisdiction, and according to the terms of the contract between the cloud service provider and the customer. Legislation which governs how PII may be processed (i.e. collected, used, transferred and disposed of) is sometimes referred to as data protection legislation; PII is sometimes referred to as personal data. The obligations falling on a PII processor vary from jurisdiction to jurisdiction, which makes it challenging for businesses providing cloud computing services to operate multi-nationally.

A public cloud service provider is a 'PII processor' when it processes PII for and according to the instructions of a cloud service customer. The cloud service customer, who has the contractual relationship with the cloud PII processor, may range from a natural person, a 'PII principal', processing his or her own PII in the cloud, to an organization, a 'PII controller', processing PII relating to many PII principals. The cloud service customer may possibly authorize one or more cloud service users associated with it to use the services made available to it under its contract with the cloud PII processor. Note that the cloud service customer has authority over the processing and use of the data. A cloud service customer who is also a PII controller may be subject to a wider set of obligations governing the protection of PII than the cloud PII processor. Maintaining the distinction between PII controller and PII processor relies on the cloud PII processor having no data processing objectives other than those set by the cloud service customer with respect to the PII it processes and the operations necessary to achieve the cloud service customer's objectives.

NOTE Where the cloud PII processor is processing cloud service customer account data then it is acting as a PII controller for this purpose. This International Standard does not cover such activity.

The intention of this International Standard is to create a common set of security categories and controls that may be implemented by a public cloud computing service provider acting as a PII processor. It has the following objectives.

- To help the cloud service provider to comply with applicable obligations when acting as a PII processor, whether such obligations fall on the PII processor directly or through contract.
- To enable the cloud PII processor to be transparent in relevant matters so that cloud service customers can select well-governed cloud-based PII processing services.
- To assist the cloud service customer and cloud PII processor enter into a contractual agreement.
- To provide cloud service customers with a mechanism for exercising audit and compliance rights and responsibilities in cases where individual cloud service customer audits of data hosted in a multi-party, virtualized server (cloud) environment may be impractical technically and may increase risks to those physical and logical network security controls in place.

This International Standard does not replace applicable legislation and regulations, but can assist by providing a common compliance framework for public cloud service providers, in particular those that operate in a multi-national market.

0.2 PII protection controls for public cloud computing services

This International Standard is designed for organizations to use as a reference for selecting PII protection controls within the process of implementing a cloud computing information security management system based on ISO/IEC 27001, or as a guidance document for organizations for implementing commonly accepted PII protection controls. In particular, this standard has been based on ISO/IEC 27002, taking into

consideration the specific risk environment(s) arising from those PII protection requirements which may apply to public cloud computing service providers acting as PII processors.

Typically an organization implementing ISO/IEC 27001 is protecting its own information assets. However, in the context of PII protection requirements for a public cloud service provider acting as a PII processor, the organization is protecting the information assets entrusted to it by its customers. Implementation of the controls of ISO/IEC 27002 by the PII processor is both suitable for this purpose and necessary. However, this International Standard augments the ISO/IEC 27002 controls to accommodate the distributed nature of the risk and the existence of a contractual relationship between the cloud service customer and the cloud PII processor. This International Standard augments ISO/IEC 27002 in two ways: firstly, implementation guidance applicable to public cloud PII protection is provided for certain of the existing ISO/IEC 27002 controls, and secondly Annex A provides a set of additional controls and associated guidance intended to address public cloud PII protection requirements not addressed by the existing ISO/IEC 27002 control set.

Most of the controls and guidance in this International Standard will also apply to a PII controller. However, the PII controller will, in most cases, be subject to additional obligations not specified here.

0.3 PII protection requirements

It is essential that an organization identifies its requirements for the protection of PII. There are three main sources of requirement, as given below.

- a) Legal, Statutory, Regulatory and Contractual Requirements: One source is the legal, statutory, regulatory, and contractual requirements and obligations that an organization, its trading partners, contractors, and service providers have to satisfy, and their socio-cultural responsibilities and operating environment. It should be noted that legislation, regulations and contractual commitments made by the PII processor may mandate the selection of particular controls and may also necessitate specific criteria for implementing those controls. These requirements may vary from one jurisdiction to another.
- b) Risks: Another source is derived from assessing risks to the organization associated with PII, taking into account the organization's overall business strategy and objectives. Through a risk assessment, threats are identified, vulnerability to and likelihood of occurrence is evaluated and potential impact is estimated. ISO/IEC 27005 provides information security risk management guidance, including advice on risk assessment, risk acceptance, risk communication, risk monitoring and risk review. ISO/IEC 29134 provides guidance on privacy impact assessment.
- c) Corporate policies: Furthermore, while many aspects covered by a corporate policy are derived from legal and socio-cultural obligations, an organization may also choose voluntarily to go beyond the criteria that are derived from the requirements of a).

0.4 Selecting and implementing controls in a cloud computing environment

Controls can be selected from this International Standard (which includes by reference the controls from ISO/IEC 27002, creating a combined reference control set for the application defined by the scope). If required, controls can also be selected from other control sets, or new controls can be designed to meet specific needs as appropriate.

The selection of controls is dependent upon organizational decisions based on the criteria for risk acceptance, risk treatment options, and the general risk management approach applied to the organization and, through contractual agreements, its customers and suppliers, and should also be subject to all relevant national and international legislation and regulations. Where controls from this International Standard are not selected this should be documented with the justification.

Further, the selection and implementation of controls is dependent upon the public cloud provider's actual role in the context of the whole cloud computing reference architecture (see ISO/IEC 17789). Many different organizations may be involved in providing infrastructure and application services in a cloud computing environment. In some circumstances, selected controls may be unique to a particular layer of the cloud computing reference architecture. In other instances, there may be shared roles in implementing security

controls. Contractual agreements should clearly specify the PII protection responsibilities of all organizations involved in providing or using the cloud services, including the cloud PII processor, its sub-contractors and the cloud service customer.

The controls in this standard can be considered as guiding principles and applicable for most organizations. They are explained in more detail below along with implementation guidance. Implementation may be made simpler if requirements for the protection of PII have been considered in the design of the cloud PII processor's information system, services and operations. Such consideration is an element of the concept that is often called "Privacy by Design". The bibliography lists relevant documents such as ISO/IEC 29101.

0.5 Developing additional guidelines

This International Standard can be regarded as a starting point for developing PII protection guidelines. Not all of the controls and guidance in this code of practice may be applicable. Furthermore, additional controls and guidelines not included in this standard may be required. When documents are developed containing additional guidelines or controls, it may be useful to include cross-references to clauses in this standard where applicable to facilitate compliance checking by auditors and business partners.

0.6 Lifecycle considerations

PII has a natural lifecycle, from creation and origination through storage, processing, use and transmission to its eventual destruction or decay. The risks to PII may vary during its lifetime but protection of PII remains important to some extent at all stages.

PII protection requirements need to be taken into account as existing and new information systems are managed through their lifecycle.

Information technology — Security techniques — Code of practice for PII protection in public clouds acting as PII processors

1 Scope

This International Standard establishes commonly accepted control objectives, controls and guidelines for implementing measures to protect Personally Identifiable Information in accordance with the privacy principles in ISO/IEC 29100 for the public cloud computing environment.

In particular, this International Standard specifies guidelines based on ISO/IEC 27002, taking into consideration the regulatory requirements for the protection of Personally Identifiable Information which may be applicable within the context of the information security risk environment(s) of a provider of public cloud services.

This International Standard is applicable to all types and sizes of organizations, including public and private companies, government entities, and not-for-profit organizations, which provide information processing services as PII processors via cloud computing under contract to other organizations.

The guidelines in this International Standard may also be relevant to organizations acting as PII controllers; however, PII controllers may be subject to additional PII protection legislation, regulations and obligations, not applying to PII processors. This International Standard is not intended to cover such additional obligations.

2 Normative references

The following referenced documents are indispensable for the application of this document. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

ISO/IEC 27000:2012, *Information technology — Security techniques — Information security management systems — Overview and vocabulary*

ISO/IEC 27001:2013, *Information technology — Security techniques — Information security management systems — Requirements*

ISO/IEC 27002:2013, *Information technology — Security techniques — Code of practice for information security controls*

ISO/IEC 29100:2011, *Information technology — Security techniques — Privacy framework*

3 Terms and definitions

For the purposes of this document, the following terms and definitions apply, in addition to those given in ISO/IEC 27000.

EDITOR'S NOTE Some of the terms and definitions in this clause that are defined in other International Standards (e.g. ISO/IEC 29100) may be deleted prior to the completion of this International Standard.

3.1

cloud computing

paradigm for enabling network access to a scalable and elastic pool of shareable physical or virtual resources with self-service provisioning and administration on-demand

NOTE Some of the terms in this definition are further defined in ISO/IEC 17788.

[SOURCE: ISO/IEC DIS 17788]

3.2

cloud service

one or more capabilities offered via cloud computing invoked using a defined interface

[SOURCE: ISO/IEC DIS 17788]

3.3

cloud service customer

party which is in a business relationship for the purpose of using cloud services

NOTE Some of the terms in this definition are further defined in ISO/IEC 17788.

[SOURCE: ISO/IEC DIS 17788]

NOTE The cloud service customer may range from a natural person, a PII principal, processing his or her own PII in the cloud, to an organization, a PII controller, processing PII relating to many PII principals, or a PII processor who in turn is processing PII on behalf of its own cloud service customers.

3.4

cloud service provider

party which makes cloud services available

NOTE Some of the terms in this definition are further defined in ISO/IEC 17788.

[SOURCE: ISO/IEC DIS 17788]

3.5

cloud service user

natural person, or entity acting on their behalf, associated with a cloud service customer that uses cloud services

NOTE Some of the terms in this definition are further defined in ISO/IEC 17788.

[SOURCE: ISO/IEC DIS 17788]

3.6

data breach

compromise of security that leads to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to protected data transmitted, stored or otherwise processed

[SOURCE: ISO/IEC 3rd CD 27040]

3.7

Infrastructure as a Service (IaaS)

cloud service category in which the cloud capabilities type provided to the cloud service customer is an infrastructure capabilities type

NOTE Some of the terms in this definition are further defined in ISO/IEC 17788.

[SOURCE: ISO/IEC DIS 17788]

3.8**personally identifiable information PII**

any information that (a) can be used to identify the PII principal to whom such information relates, or (b) is or might be directly or indirectly linked to a PII principal

NOTE To determine whether a PII principal is identifiable, account should be taken of all the means which can reasonably be used by the privacy stakeholder holding the data, or by any other party, to identify that natural person.

[SOURCE: ISO/IEC 29100]

NOTE This definition is included to define the term PII as used in this International Standard. A cloud PII processor is typically not in a position to know explicitly whether information it processes falls into any specified category unless this is made transparent by the cloud service customer.

3.9**PII controller**

privacy stakeholder (or privacy stakeholders) that determines the purposes and means for processing personally identifiable information (PII) other than natural persons who use data for personal purposes

NOTE A PII controller sometimes instructs others (e.g. PII processors) to process PII on its behalf while the responsibility for the processing remains with the PII controller.

[SOURCE: ISO/IEC 29100]

3.10**PII principal**

natural person to whom the personally identifiable information (PII) relates

NOTE Depending on the jurisdiction and the particular PII protection and privacy legislation, the synonym “data subject” can also be used instead of the term “PII principal”.

[SOURCE: ISO/IEC 29100]

3.11**PII processor**

privacy stakeholder that processes personally identifiable information (PII) on behalf of and in accordance with the instructions of a PII controller

[SOURCE: ISO/IEC 29100]

3.12**Platform as a Service (PaaS)**

cloud service category in which the cloud capabilities type provided to the cloud service customer is a platform capabilities type

NOTE Some of the terms in this definition are further defined in ISO/IEC 17788.

[SOURCE: ISO/IEC DIS 17788]

3.13**public cloud**

cloud deployment model that is potentially available to any cloud service customer where resources are controlled by the cloud service provider

NOTE Some of the terms in this definition are further defined in ISO/IEC 17788.

[SOURCE: ISO/IEC DIS 17788]

3.14

Software as a Service (SaaS)

cloud service category in which the cloud capabilities type provided to the cloud service customer is an application capabilities type

NOTE Some of the terms in this definition are further defined in ISO/IEC 17788.

[SOURCE: ISO/IEC DIS 17788]

4 Overview

4.1 Structure of this standard

This International Standard has a structure similar to that of ISO/IEC 27002. In cases where objectives and controls specified in ISO/IEC 27002 are applicable without a need for any additional information, only a reference is provided to ISO/IEC 27002. Additional controls and associated implementation guidance applicable to PII protection for cloud computing service providers are described in Annex A (normative).

In cases where controls need additional guidance applicable to PII protection for cloud computing service providers, this is given under the heading *Public cloud PII protection implementation guidance*. As shown in Table 1, such application-specific guidance and information is included in the categories defined in ISO/IEC 27002. Clause numbers, which have been aligned with the corresponding clause numbers in ISO/IEC 27002, are as indicated in the table.

Table 1 — Location of application-specific guidance and other information for implementing controls in ISO/IEC 27002

Clause number	Title	Remarks
5	Information security policies	Application-specific implementation guidance and other information is provided.
6	Organization of information security	Application-specific implementation guidance is provided.
7	Human resource security	Application-specific implementation guidance and other information is provided.
8	Asset management	No additional application-specific implementation guidance or other information is provided.
9	Access control	Application-specific implementation guidance is provided, together with a cross-reference to control(s) in Annex A.
10	Cryptography	No additional application-specific implementation guidance or other information is provided.
11	Physical and environmental security	Application-specific implementation guidance is provided.
12	Operations security	Application-specific implementation guidance is provided.
13	Communications security	Application-specific implementation guidance is provided.
14	System acquisition, development and maintenance	No additional application-specific implementation guidance or other information is provided.
15	Supplier relationships	No additional application-specific implementation guidance or other information is provided.
16	Information security incident management	Application-specific implementation guidance is provided.
17	Information security aspects of business continuity management	No additional application-specific implementation guidance or other information is provided.
18	Compliance	Application-specific implementation guidance is provided, together with a cross-reference to control(s) in Annex A.

4.2 Control categories

In line with ISO/IEC 27002, each main control category contains:

- a) a control objective stating what is to be achieved; and
- b) one or more controls that can be applied to achieve the control objective.

Control descriptions are structured as follows:

Control

Defines the specific control statement, to satisfy the control objective.

Public cloud PII protection implementation guidance

Provides more detailed information to support the implementation of the control and meeting the control objectives. The guidance may not be entirely suitable or sufficient in all situations, and may not fulfil the organization's specific control requirements. Alternative or additional controls, or other forms of risk treatment (avoiding, transferring or accepting risks), may therefore be appropriate.

Other information for public cloud PII protection

Provides further information that may need to be considered, such as legal considerations and references to other standards.

5 Information security policies

5.1 Management direction for information security

The objective specified in clause 5.1 of ISO/IEC 27002 applies.

5.1.1 Policies for information security

Control 5.1.1 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply. The following application-specific guidance also applies.

Public cloud PII protection implementation guidance

The information security policies should be augmented by a privacy policy containing a statement concerning support for and commitment to managing compliance with applicable PII protection legislation and the contractual terms agreed between the cloud PII processor and its clients (cloud service customers).

Contractual agreements should clearly allocate responsibilities between the cloud PII processor, its sub-contractors and the cloud service customer, taking into account the type of cloud service in question (e.g. a service provided at the IaaS, the PaaS, or the SaaS layer of the cloud computing reference architecture). For example, the allocation of responsibility for application layer controls may differ depending on whether the cloud PII processor is providing a SaaS service or rather is providing a PaaS or IaaS service upon which the cloud service customer can build or layer its own proprietary applications.

Other information for public cloud PII protection

In some jurisdictions the cloud PII processor is directly subject to PII protection legislation. Elsewhere, PII protection legislation applies to the PII controller only.

A mechanism to ensure the cloud PII processor is obliged to support and manage compliance is provided by the contract between the cloud service customer and the cloud PII processor. The contract could call for independently audited compliance, acceptable to the cloud service customer, for example via the implementation of the relevant controls in this International Standard and in ISO/IEC 27002.

5.1.2 Review of the policies for information security

Control 5.1.2 and the associated implementation guidance specified in ISO/IEC 27002 apply.

6 Organization of information security

6.1 Internal organization

The objective specified in clause 6.1 of ISO/IEC 27002 applies.

6.1.1 Information security roles and responsibilities

Control 6.1.1 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply. The following application-specific guidance also applies.

Public cloud PII protection implementation guidance

The cloud PII processor should designate a point of contact for use by the cloud service customer regarding the processing of PII under the data processing contract.

6.1.2 Segregation of duties

Control 6.1.2 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

6.1.3 Contact with authorities

Control 6.1.3 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

6.1.4 Contact with special interest groups

Control 6.1.4 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

6.1.5 Information security in project management

Control 6.1.5 and the associated implementation guidance specified in ISO/IEC 27002 apply.

6.2 Mobile devices and teleworking

The objective specified in, and the contents of, clause 6.2 of ISO/IEC 27002 apply.

7 Human resource security

7.1 Prior to employment

The objective specified in, and the contents of, clause 7.1 of ISO/IEC 27002 apply.

7.2 During employment

The objective specified in clause 7.2 of ISO/IEC 27002 applies.

7.2.1 Management responsibilities

Control 7.2.1 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

7.2.2 Information security awareness, education and training

Control 7.2.2 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply. The following application-specific guidance also applies.

Public cloud PII protection implementation guidance

Measures should be put in place to make relevant staff aware of the possible consequences on the cloud PII processor (for example, legal consequences, loss of business and brand or reputational damage), on the staff member (for example disciplinary consequences) and on the PII principal (for example physical, material and emotional consequences) of breaching privacy or security rules and procedures, especially those addressing the handling of PII.

Other information for public cloud PII protection

In some jurisdictions, the cloud PII processor may be subject to legal sanctions, including substantial fines directly from the local PII protection authority. In other jurisdictions the use of International Standards such as this in setting up the contract between the cloud PII processor and the cloud service customer should establish a basis for contractual sanctions for a breach of security rules and procedures.

7.2.3 Disciplinary process

Control 7.2.3 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

7.3 Termination and change of employment

The objective specified in, and the contents of, clause 7.3 of ISO/IEC 27002 apply.

8 Asset management

The objectives specified in, and the contents of, clause 8 of ISO/IEC 27002 apply.

9 Access control

9.1 Business requirements of access control

The objective specified in, and the contents of, clause 9.1 of ISO/IEC 27002 apply.

9.2 User access management

The objective specified in clause 9.2 of ISO/IEC 27002 applies. The following application-specific guidance also applies to the implementation of all of the controls under this subclause (9.2).

Public cloud PII protection implementation guidance

In the context of the layers of the cloud computing reference architecture, the cloud service customer may be responsible for some or all aspects of access management for cloud service users under its control. Where appropriate, the cloud PII processor should enable the cloud service customer to manage access by cloud service users under the cloud service customer's control, such as by providing administrative rights to manage or terminate access.

9.2.1 User registration and de-registration

Control 9.2.1 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply. The following application-specific guidance also applies.

Public cloud PII protection implementation guidance

Procedures for user registration and de-registration should address a compromise of user access control such as the corruption or compromise of passwords or other user registration data, e.g. as a result of inadvertent disclosure.

NOTE Individual jurisdictions may impose specific requirements regarding the frequency of checks for unused authentication credentials. Organizations operating in these jurisdictions should ensure that they comply with these requirements.

9.2.2 User access provisioning

Control 9.2.2 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

9.2.3 Management of privileged access rights

Control 9.2.3 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

9.2.4 Management of secret authentication information of users

Control 9.2.4 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

9.2.5 Review of user access rights

Control 9.2.5 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

9.2.6 Removal or adjustment of access rights

Control 9.2.6 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

9.3 User responsibilities

The objective specified in clause 9.3 of ISO/IEC 27002 applies.

9.3.1 Use of secret authentication information

Control 9.3.1 and the associated implementation guidance specified in ISO/IEC 27002 apply.

9.4 System and application access control

The objective specified in clause 9.4 of ISO/IEC 27002 applies.

9.4.1 Information access restriction

Control 9.4.1 and the associated implementation guidance specified in ISO/IEC 27002 apply.

NOTE Additional controls and guidance relevant to information access restriction can be found in A.10.13 of Annex A (normative).

9.4.2 Secure log-on procedures

Control 9.4.2 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply. The following application-specific guidance also applies.

Public cloud PII protection implementation guidance

Where required, the cloud PII processor should provide secure log-on procedures for any accounts requested by the cloud service customer for cloud service users under its control.

9.4.3 Password management system

Control 9.4.3 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply. The following application-specific guidance also applies.

9.4.4 Use of privileged utility programs

Control 9.4.4 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

9.4.5 Access control to program source code

Control 9.4.5 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

10 Cryptography

The objectives specified in, and the contents of, clause 10 of ISO/IEC 27002 apply.

NOTE In some jurisdictions it may be required to apply cryptography to protect particular kinds of PII, such as health data concerning a PII principal.

11 Physical and environmental security

11.1 Secure areas

The objective specified in, and the contents of, clause 11.1 of ISO/IEC 27002 apply.

11.2 Equipment

The objective specified in clause 11.2 of ISO/IEC 27002 applies.

11.2.1 Equipment siting and protection

Control 11.2.1 and the associated implementation guidance specified in ISO/IEC 27002 apply.

11.2.2 Supporting utilities

Control 11.2.2 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

11.2.3 Cabling security

Control 11.2.3 and the associated implementation guidance specified in ISO/IEC 27002 apply.

11.2.4 Equipment maintenance

Control 11.2.4 and the associated implementation guidance specified in ISO/IEC 27002 apply.

11.2.5 Removal of assets

Control 11.2.5 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

11.2.6 Security of equipment and assets off-premises

Control 11.2.6 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

11.2.7 Secure disposal or re-use of equipment

Control 11.2.7 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply. The following application-specific guidance also applies.

Public cloud PII protection implementation guidance

For the purposes of secure disposal or re-use, equipment containing storage media that may possibly contain PII should be treated as though it does.

11.2.8 Unattended user equipment

Control 11.2.8 and the associated implementation guidance specified in ISO/IEC 27002 apply.

11.2.9 Clear desk and clear screen policy

Control 11.2.9 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

12 Operations security**12.1 Operational procedures and responsibilities**

The objective specified in clause 12.1 of ISO/IEC 27002 applies.

12.1.1 Documented operating procedures

Control 12.1.1 and the associated implementation guidance specified in ISO/IEC 27002 apply.

12.1.2 Change management

Control 12.1.2 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

12.1.3 Capacity management

Control 12.1.3 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

12.1.4 Separation of development, testing and operational environments

Control 12.1.4 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply. The following application-specific guidance also applies.

Public cloud PII protection implementation guidance

Where the use of PII for testing purposes cannot be avoided a risk assessment should be undertaken. Technical and organizational measures should be implemented to minimize the risks identified.

12.2 Protection from malware

The objective specified in, and the contents of, clause 12.2 of ISO/IEC 27002 apply.

12.3 Backup

The objective specified in clause 12.3 of ISO/IEC 27002 applies.

12.3.1 Information backup

Control 12.3.1 and the associated implementation guidance specified in ISO/IEC 27002 apply. The following application-specific guidance also applies.

Public cloud PII protection implementation guidance

Information processing systems based on the cloud computing model introduce additional or alternative mechanisms to off-site backups for protecting against loss of data, ensuring continuity of data processing operations, and providing the ability to restore data processing operations after a disruptive event. Multiple copies of data in physically and/or logically diverse locations (which may be within the information processing system itself) should be created or maintained for the purposes of backup and/or recovery.

NOTE 1 Individual jurisdictions may impose specific requirements regarding the frequency of back-ups. Organizations operating in these jurisdictions should ensure that they comply with these requirements.

Procedures should be put in place with the objective of allowing for restoration of data processing operations within a specified, documented period after a disruptive event.

The back-up and recovery procedures should be reviewed at a specified, documented frequency.

NOTE 2 Individual jurisdictions may impose specific requirements regarding the frequency of reviews of back-up and recovery procedures. Organizations operating in these jurisdictions should ensure that they comply with these requirements.

The use of sub-contractors to store replicated or backup copies of data being processed is covered by the controls in this International Standard applying to sub-contracted PII processing. Where physical media transfers take place this is also covered by controls in this International Standard.

The cloud PII processor should have a policy which addresses the requirements for backup of information and any further requirements (e.g. contractual and/or legal requirements) for the erasure of PII which backed up information may contain.

12.4 Logging and monitoring

The objective specified in clause 12.4 of ISO/IEC 27002 applies.

12.4.1 Event logging

Control 12.4.1 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply. The following application-specific guidance also applies.

Public cloud PII protection implementation guidance

A process should be put in place to verify the event log with a specified, documented periodicity, to identify irregularities and propose remediation efforts.

Where possible, the event log should record whether or not PII has been changed (added, modified or deleted) as a result of an event, and by whom. Where multiple service providers are involved in providing service at different layers of the cloud computing reference architecture, there may be varied or shared roles in implementing this guidance.

The cloud PII processor should define procedures regarding if, when and how log information can be made available to or usable by the cloud service customer. These procedures should be made available to the cloud service customer.

12.4.2 Protection of log information

Control 12.4.2 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply. The following application-specific guidance also applies.

Public cloud PII protection specific implementation guidance

Log information recorded for purposes such as security monitoring and operational diagnostics may contain PII. Measures, such as controlling access (see 9.2.3), should be put in place designed to ensure that logged information is only used for its intended purposes.

12.4.3 Administrator and operator logs

Control 12.4.3 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

12.4.4 Clock synchronization

Control 12.4.4 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

12.5 Control of operational software

The objective specified in, and the contents of, clause 12.5 of ISO/IEC 27002 apply.

12.6 Technical vulnerability management

The objective specified in, and the contents of, clause 12.6 of ISO/IEC 27002 apply.

12.7 Information systems audit considerations

The objective specified in, and the contents of, clause 12.7 of ISO/IEC 27002 apply.

13 Communications security

13.1 Network security management

The objective specified in, and the contents of, clause 13.1 of ISO/IEC 27002 apply.

13.2 Information transfer

The objective specified in clause 13.2 of ISO/IEC 27002 applies.

13.2.1 Information transfer policies and procedures

Control 13.2.1 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply. The following application-specific guidance also applies.

Public cloud PII protection implementation guidance

Whenever physical media are used for information transfer, a system should be put in place to record incoming and outgoing physical media containing PII, including the type of physical media, the authorized sender/recipients, the date and time, the number of physical media, and the types of PII they contain.

13.2.2 Agreements on information transfer

Control 13.2.2 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

13.2.3 Electronic messaging

Control 13.2.3 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

13.2.4 Confidentiality or non-disclosure agreements

Control 13.2.4 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

14 System acquisition, development and maintenance

The objectives specified in, and the contents of, clause 14 of ISO/IEC 27002 apply.

15 Supplier relationships

The objectives specified in, and the contents of, clause 15 of ISO/IEC 27002 apply.

NOTE Further information regarding supplier relationship management may be obtained from ISO/IEC 27036-4.

16 Information security incident management

16.1 Management of information security incidents and improvements

The objective specified in clause 16.1 of ISO/IEC 27002 applies. The following application-specific guidance also applies to the implementation of all of the controls under this subclause (16.1).

Public cloud PII protection implementation guidance

In the context of the whole cloud computing reference architecture, there may be shared roles in the management of information security incidents and making improvements. There may be a need for the cloud PII processor to cooperate with the cloud service customer in implementing the controls in this subclause.

16.1.1 Responsibilities and procedures

Control 16.1.1 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply. The following application-specific guidance also applies.

Public cloud PII protection implementation guidance

An information security incident should trigger a review by the cloud PII processor, as part of its information security incident management process, to determine if a data breach involving PII has taken place (see A.9.1).

An information security event should not necessarily trigger such a review. An information security event is one that does not result in actual, or the significant probability of, unauthorized access to PII or to any of the cloud PII processor's equipment or facilities storing PII, and may include, without limitation, pings and other broadcast attacks on firewalls or edge servers, port scans, unsuccessful log-on attempts, denial of service attacks, and packet sniffing.

16.1.2 Reporting information security events

Control 16.1.2 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

16.1.3 Reporting information security weaknesses

Control 16.1.3 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

16.1.4 Assessment of and decision on information security events

Control 16.1.4 and the associated implementation guidance specified in ISO/IEC 27002 apply.

16.1.5 Response to information security incidents

Control 16.1.5 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

16.1.6 Learning from information security incidents

Control 16.1.6 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

16.1.7 Collection of evidence

Control 16.1.7 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

17 Information security aspects of business continuity management

The objectives specified in, and the contents of, clause 17 of ISO/IEC 27002 apply.

18 Compliance

18.1 Compliance with legal and contractual requirements

The objective specified in, and the contents of, clause 18.1 of ISO/IEC 27002 apply.

NOTE Additional controls and guidance relevant to compliance with legal and contractual requirements may be found in Annex A (normative), clause A.11.

18.2 Information security reviews

The objective specified in clause 18.2 of ISO/IEC 27002 applies.

18.2.1 Independent review of information security

Control 18.2.1 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply. The following application-specific guidance also applies.

Public cloud PII protection implementation guidance

In cases where individual cloud service customer audits are impractical or may increase risks to security (see 0.1), the cloud PII processor should make available to prospective cloud service customers, prior to entering into a contract, independent evidence that information security is implemented and operated in accordance with the cloud PII processor's policies and procedures. A relevant independent audit as selected by the cloud PII processor should normally be an acceptable method for fulfilling the cloud service customer's interest in reviewing the cloud PII processor's processing operations, provided sufficient transparency is provided.

18.2.2 Compliance with security policies and standards

Control 18.2.2 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

18.2.3 Technical compliance review

Control 18.2.3 and the associated implementation guidance and other information specified in ISO/IEC 27002 apply.

Annex A (normative)

Public cloud PII processor extended control set for PII protection

This annex specifies new controls and associated implementation guidance, which in combination with the augmented controls and guidance in ISO/IEC 27002 (see clauses 5 to 18) make up an extended control set to meet the requirements for PII protection which apply to public cloud service providers acting as PII processors.

These additional controls are classified according to the eleven privacy principles of ISO/IEC 29100. In many cases the controls could be classified under more than one of the privacy principles. In such cases they are classified under the most relevant principle.

A.1 Consent and choice

A.1.1 Obligation to co-operate regarding PII principals' rights

Control

The cloud PII processor should provide the cloud service customer with the means to enable them to fulfil their obligation to facilitate the exercise of PII principals' rights to access, correct, and/or erase PII pertaining to them.

Public cloud PII protection implementation guidance

The PII controller's obligations in this respect may be defined by law, by regulations or by contract. These obligations may include matters where the cloud service customer uses the services of the cloud PII processor for implementation. For example this could include the correction or deletion of PII in a timely fashion.

Where the PII controller depends on the cloud PII processor for information or technical measures to facilitate the exercise of PII principals' rights, the relevant information or technical measures should be specified in the contract.

A.2 Purpose legitimacy and specification

A.2.1 Cloud PII processor's purpose

Control

PII to be processed under a data processing contract should not be processed for any purpose independent of the instructions of the cloud service customer.

Public cloud PII protection implementation guidance

Instructions may be contained in the contract between the cloud PII processor and the cloud service customer, including, for example, the objective and time frame to be achieved by the service.

In order to achieve the cloud service customer's purpose, there may be technical reasons why it is appropriate for a cloud PII processor to determine the processing method based on PII, consistent with the general instructions of the cloud service customer but without the cloud service customer's express instruction. For example, in order to efficiently utilize network or processing capacity it may be necessary to allocate specific

processing resources depending on certain characteristics of the PII principal. In circumstances where the cloud PII processor's determination of the processing method involves the collection and use of PII, the cloud PII processor should adhere to the relevant privacy principles set forth in ISO/IEC 29100.

The cloud PII processor should provide the cloud service customer with all relevant information, in a timely fashion, to allow the cloud service customer to ensure the cloud PII processor's compliance with purpose specification and limitation principles and ensure that no PII is processed for further purposes independent of the instructions of the cloud service customer by the cloud PII processor or any of its sub-contractors.

A.2.2 Cloud PII processor's commercial use

Control

PII processed under a data processing contract should not be used by the cloud PII processor for the purposes of marketing and advertising without express consent. Such consent should not be a condition of receiving the service.

A.3 Collection limitation

No additional controls are relevant to this privacy principle.

A.4 Data minimization

A.4.1 Secure erasure of temporary files

Control

Temporary files and documents should be erased or destroyed within a specified, documented period.

Public cloud PII protection implementation guidance

Implementation guidance on PII erasure is provided in A.10.11.

Information systems may create temporary files in the normal course of their operation. Such files are system- and application-specific, but may include file system roll-back journals and temporary files associated with the updating of databases and the operation of other application software. Temporary files are not needed after the related information processing task has completed but there are circumstances in which they may not be deleted. The length of time for which these files remain in use is not always deterministic but a "garbage collection" procedure should identify the relevant files and determine how long since they were last used.

PII processing information systems should implement a periodic check that unused temporary files above a specified age are deleted.

A.5 Use, retention and disclosure limitation

A.5.1 PII disclosure notification

Control

The contract between the cloud PII processor and the cloud service customer should require the cloud PII processor to notify the cloud service customer of any legally binding request for disclosure of PII by a law enforcement authority, unless such a disclosure is otherwise prohibited.

Public cloud PII protection implementation guidance

The cloud PII processor should provide contractual guarantees that it will reject any requests for PII disclosure that are not legally binding, consult the corresponding cloud service customer where legally permissible before making any PII disclosure and accept any contractually agreed requests for PII disclosures that are authorized by the corresponding cloud service customer.

A.5.2 Recording of PII disclosures

Control

Disclosures of PII should be recorded, including what PII has been disclosed, to whom, at what time.

Public cloud PII protection implementation guidance

PII may be disclosed during the course of normal operations. These disclosures should be recorded (see 12.4.1). Any additional disclosures, including events such as lawful investigations, internal audits and external audits, should also be recorded. The records should include the person making the disclosure and the source of the authority to make the disclosure.

A.6 Accuracy and quality

No additional controls are relevant to this privacy principle.

A.7 Openness, transparency and notice

A.7.1 Disclosure of sub-contracted PII processing

Control

The use of sub-contractors by the PII processor to process PII should be disclosed before their use to the relevant cloud service customers.

Public cloud PII protection implementation guidance

Provisions for the use of sub-contractors to process PII should be transparent in the contract between the cloud PII processor and the cloud service customer. The contract should specify that sub-contractors should only be commissioned on the basis of a consent that can generally be given by the cloud service customer at the beginning of the service. The cloud PII processor should inform the cloud service customer in a timely fashion of any intended changes in this regard so that the cloud service customer has the ability to object to such changes or to terminate the contract.

Information disclosed should cover the fact that sub-contracting is used and the names of relevant sub-contractors, but not any business-specific details. The information disclosed should also include the countries in which sub-contractors may process data (see A.11.1) and the means by which sub-contractors are obliged to meet or exceed the obligations of the cloud PII processor (see A.10.12).

Where public disclosure of sub-contractor information is assessed to increase security risk beyond acceptable limits, disclosure should be made under a non-disclosure agreement and/or on the request of the cloud service customer. The cloud service customer should be made aware that the information is available.

A.8 Individual participation and access

No additional controls are relevant to this privacy principle.

A.9 Accountability

A.9.1 Notification of a data breach involving PII

Control

The cloud PII processor should promptly notify the relevant cloud service customer in the event of any unauthorized access to PII, or unauthorized access to processing equipment or facilities resulting in loss, disclosure, or alteration of PII.

Public cloud PII protection implementation guidance

Provisions covering the notification of a data breach involving PII should form part of the contract between the cloud PII processor and the cloud service customer. The contract should specify how the cloud PII processor will provide the information necessary for the cloud service customer to fulfil his obligation to notify relevant authorities.

In the event that a data breach involving PII has occurred, a record should be maintained with a description of the incident, the time period, the consequences of the incident, the name of the reporter, to whom the incident was reported, the steps taken to resolve the incident (including the person in charge and the data recovered), and the fact that the incident resulted in loss, disclosure or alteration of PII.

In the event that a data breach involving PII has occurred, the record should also include a description of the data compromised, if known; and if notifications were performed, the steps taken to notify the cloud service customer, and/or regulatory agencies.

In some jurisdictions relevant legislation or regulations may require the cloud PII processor to directly notify appropriate regulatory authorities (e.g. a PII protection authority) of a data breach involving PII.

NOTE There may be other breaches requiring notification that are not covered here. For example collection without consent or other authorization, use for unauthorized purposes, etc.

A.9.2 Retention period for administrative security policies and guidelines

Control

Records of security policies and operating procedures should be retained for a specified, documented period upon replacement (including updating).

Public cloud PII protection implementation guidance

Review of current and historical policies and procedures may be required, for example, in the cases of customer dispute resolution and investigation by a PII protection authority. A retention period of five years is recommended in the absence of a specific legal or contractual requirement.

A.9.3 PII return, transfer and disposal

Control

The cloud PII processor should have a policy in respect of the return, transfer, and/or destruction of PII and should make this policy available to the cloud service customer.

Public cloud PII protection implementation guidance

At some point in time, PII may need to be disposed of in some manner. This may involve returning the PII to the cloud service customer, transferring it to another cloud PII processor or to a PII controller (e.g. as a result of a merger), securely deleting or otherwise destroying it, anonymizing it, or archiving it.

The cloud PII processor should provide the information necessary to allow the cloud service customer to ensure that PII processed under a data processing contract is erased (by the cloud PII processor and any of its sub-contractors) from wherever they are stored, including for the purposes of backup and business continuity, as soon as they are no longer necessary for the specific purposes of the cloud service customer. The nature of the disposition mechanisms (de-linking, overwriting, demagnetization, destruction, or other forms of erasure) and/or the applicable commercial standards should be provided for contractually.

The cloud PII processor should develop and implement a policy in respect of the disposition of PII and should make this policy available to cloud service customer.

The policy should cover the retention period for PII before its destruction after termination of a contract, to protect the cloud service customer from losing PII through an accidental lapse.

NOTE This control and guidance is also relevant under the retention element of the “Use, retention and disclosure limitation” principle (see A.5).

A.10 Information security

A.10.1 Confidentiality or non-disclosure agreements

Control

Individuals under the cloud PII processor’s control with access to PII should be subject to a confidentiality obligation.

Public cloud PII protection implementation guidance

A confidentiality clause should be included in the contract between the cloud PII processor and its employees. The confidentiality agreement between the cloud PII processor and its employees should ensure that employees do not disclose PII for purposes independent of the instructions of the cloud service customer (see A.2.1). The obligations of the confidentiality agreement should survive termination of the employment contract.

A.10.2 Restriction of the creation of hardcopy material

Control

The creation of hardcopy material displaying PII should be restricted.

Public cloud PII protection implementation guidance

Hardcopy material includes material created by printing.

A.10.3 Control and logging of data restoration

Control

There should be a procedure for, and a log of, data restoration efforts.

Public cloud PII protection implementation guidance

NOTE The above control makes generic the following requirement which applies in certain legal jurisdictions. The log of data restoration efforts should contain: the person responsible, a description of the restored data, and the data that were restored manually.

A.10.4 Protecting data on storage media leaving the premises

Control

PII on media leaving the organization's premises should be subject to an authorization procedure and should not be accessible to anyone other than authorized personnel (e.g. by encrypting the data concerned).

A.10.5 Use of unencrypted portable storage media and devices

Control

Portable physical media and portable devices that do not permit encryption should not be used except where it is unavoidable, and any use of such portable media and devices should be documented.

A.10.6 Encryption of PII transmitted over public data-transmission networks

Control

PII that is transmitted over public data-transmission networks should be encrypted prior to transmission.

Public cloud PII protection implementation guidance

In some cases, for example the exchange of e-mail, the inherent characteristic of public data-transmission network systems might require that some header or traffic data be exposed for effective transmission.

Where multiple service providers are involved in providing service at different layers of the cloud computing reference architecture, there may be varied or shared roles in implementing this guidance.

A.10.7 Secure disposal of hardcopy materials

Control

Where hardcopy materials are destroyed, they should be destroyed securely using mechanisms such as cross-cutting, shredding, incinerating, pulping, etc.

A.10.8 Unique use of user IDs

Control

If more than one individual has access to stored PII, then they should each have a distinct user ID for identification, authentication and authorization purposes.

A.10.9 Records of authorized users

Control

An up-to-date record of the users or profiles of users who have authorized access to the information system should be maintained.

Public cloud PII protection implementation guidance

The profile of a user comprises the set of data about that user, including user ID, necessary to implement the technical controls providing authorized access to the information system.

A.10.10 User ID management

Control

De-activated or expired user IDs should not be granted to other individuals.

Public cloud PII protection implementation guidance

In the context of the whole cloud computing reference architecture, the cloud service customer may be responsible for some or all aspects of user ID management for cloud service users under its control.

A.10.11 Data processing contract measures

Control

Data processing contracts between the cloud service customer and the cloud PII processor should specify minimum technical and organizational measures to ensure that the contracted security arrangements are in place and that data is not processed for any purpose independent of the instructions of the controller. Such measures should not be subject to unilateral reduction by the cloud PII processor.

Public cloud PII protection implementation guidance

Information security and PII protection obligations relevant to the cloud PII processor may arise directly from applicable law. Where this is not the case, PII protection obligations relevant to the cloud PII processor should be covered in the data processing contract.

The controls in this International Standard, together with the controls in ISO/IEC 27002, are intended as a reference catalogue of measures to assist in entering into an information processing contract in respect of PII. The cloud PII processor should inform a prospective cloud service customer, before entering into a contract, about the aspects of its services material to the protection of PII.

The cloud PII processor should be transparent about its capabilities during the process of entering into a contract. However, it is ultimately the cloud service customer's responsibility to ensure that the measures implemented by the cloud PII processor meet its obligations.

A.10.12 Sub-contracted PII processing

Control

Data processing contracts between the cloud PII processor and any sub-contractors that process PII should specify minimum technical and organizational measures that meet the information security and PII protection obligations of the cloud PII processor. Such measures should not be subject to unilateral reduction by the sub-contractor.

Public cloud PII protection implementation guidance

The use of sub-contractors to store backup copies is covered by this control (see A.7.1).

A.10.13 Access to data on pre-used data storage space

Control

The cloud PII processor should ensure that whenever data storage space is assigned to a cloud service customer, any data previously residing on that storage space is not visible to the cloud service customer.

Public cloud PII protection implementation guidance

Upon deletion by a cloud service user of data held in an information system, performance issues may mean that explicit erasure of that data is impractical. This creates the risk that another user may be able to read the data. Such risk should be avoided by specific technical measures.

No particular technical measure is especially appropriate to deal with this issue. However, as an example, some cloud infrastructure, platforms or applications will return zeroes if a cloud service user attempts to read storage space which has not been overwritten by that user's own data.

A.11 Privacy compliance

A.11.1 Geographical location of PII

Control

The cloud PII processor should specify and document the countries in which PII might possibly be stored.

Public cloud PII protection implementation guidance

The identities of the countries where PII might possibly be stored should be made available to cloud service customers. The identities of the countries arising from the use of sub-contracted PII processing should be included. Where specific contractual agreements apply to the international transfer of data, such as Model Contract Clauses or Binding Corporate Rules, the agreements and the countries or circumstances in which such agreements apply should also be identified. The cloud PII processor should inform the cloud service customer in a timely fashion of any intended changes in this regard so that the cloud service customer has the ability to object to such changes or to terminate the contract.

A.11.2 Intended destination of PII

Control

PII transmitted using a data-transmission network should be subject to appropriate controls designed to ensure that data reaches its intended destination.

Bibliography

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- [4] ISO/IEC 17788:xxxx¹, *Information technology — Cloud computing — Vocabulary*.
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- [17] NIST SP 800-144, *Guidelines on Security and Privacy in Public Cloud Computing*, December 2011 (<http://csrc.nist.gov/publications/nistpubs/800-144/SP800-144.pdf>).

¹ To be published.


**EXPLANATORY REPORT
RAPPORT EXPLICATIF**
ISO/IEC DIS 27018
ISO/TC JTC 1 / SC 27

 Secretariat **DIN, Germany**

This form should be sent to the ISO Central Secretariat, together with the English and French versions of the committee draft, by the secretariat of the technical committee or subcommittee concerned.

Ce formulaire doit être envoyé au Secrétariat central de l'ISO en même temps que les versions anglaise et française du projet de comité, par le secrétariat du comité technique ou du sous-comité concerné.

The accompanying document is submitted for circulation to member body vote as a DIS, following consensus obtained from the P-members of the committee.

Le document ci-joint est soumis, pour diffusion comme DIS, au vote comité membre, suite au consensus des membres (P) du comité obtenu.

 on **2013-10-25**

☒ at the meeting of **TC JTC 1 / SC 27**
à la réunion du

see resolution No. **11** in document **N13373**
voir résolution n° dans le

☐ by postal ballot initiated on
par un vote par correspondance démarré le

P-members in favour: Membres (P) approuvant le projet:	Number 21	Countries Belgium (NBN) Brazil (ABNT) Canada (SCC) China (SAC) Cyprus (CYS) Czech Republic (UNMZ) France (AFNOR) Germany (DIN) Ireland (NSAI) Jamaica (BSJ) Korea, Republic of (KATS) Mexico (DGN) Luxembourg (ILNAS) New Zealand (SNZ) Norway (SN) Slovakia (SUTN) Slovenia (SIST) Sweden (SI) Thailand (TISI) Ukraine (DTR) United Kingdom (BSI)
P-members voting against: Membres (P) désapprouvant:	3	Australia (SA) Japan (JISC) United States (ANSI)
P-members abstaining: Membres (P) s'abstenant:	14	Denmark (DS) Finland (SFS) India (BIS) Israel (SII) Malaysia (DSM) Morocco (IMANOR) Netherlands (NEN) Peru (INDECOPI) Poland (PKN) Romania (ASRO) South Africa (SABS) Spain (AENOR) Switzerland (SNV) United Arab Emirates (ESMA)
P-members who did not vote: Membres (P) n'ayant pas voté:	12	Algeria (IANOR) Austria (ASI) Estonia (EVS) Italy (UNI) Kazakhstan (KAZMEMST) Kenya (KEBS) Mauritius (MSB) Russian Federation (GOST R) Singapore (SPRING SG) Sri Lanka (SLSI) The Former Yugoslav Republic of Macedonia (ISRM) Uruguay (UNIT)

Remarks/Remarques

The 1st CD was circulated as N12546. The summary of voting is presented in N13003. Liaison organizations (EUDCA, ISACA) comments are contained in N12998 and N13001, respectively. The disposition of comments are shown in N13386. The text for a 3-month DIS balloting is contained in SC 27 N13387.

The negative votes of AU, JP and US have been satisfactorily resolved and changed to APPROVAL.

I hereby confirm that this draft meets the requirements of part 2 of the ISO/IEC Directives
Je confirme que ce projet satisfait aux prescriptions de la partie 2 des Directives ISO/CEI

Date

Name and signature of the secretary
Nom et signature du secrétaire

2013-10-31

Passia, Krystyna Mrs.

Result of voting

Ballot Information

Ballot reference	ISO/IEC CD 27018 - ISO-IECJTC1-SC27_N12546
Ballot type	CD
Ballot title	Code of practice for data protection controls for public cloud computing services
Opening date	2013-06-18
Closing date	2013-09-18
Note	<p><p>CD Registration and Consideration
 In accordance with resolution 7 (contained in SC 27 N12739) of the 25th SC 27 Plenary meeting held in Sophia Antipolis, France, 29th - 30th April 2013 the hereby attached document has been registered with the ISO Central secretariat (ITTF) as a 1st Committee Draft (CD) and is being rculated for a 1st CD letter ballot closing by 2012-09-18.</p></p>

Member responses:

Votes cast (38)	Australia (SA) Belgium (NBN) Brazil (ABNT) Canada (SCC) China (SAC) Cyprus (CYS) Czech Republic (UNMZ) Denmark (DS) Finland (SFS) France (AFNOR)* Germany (DIN) India (BIS) Ireland (NSAI) Israel (SII) Jamaica (BSJ) Japan (JISC) Korea, Republic of (KATS) Luxembourg (ILNAS) Malaysia (DSM) Mexico (DGN) Morocco (IMANOR) Netherlands (NEN) New Zealand (SNZ) Norway (SN) Peru (INDECOPI) Poland (PKN) Romania (ASRO) Slovakia (SUTN) Slovenia (SIST) South Africa (SABS) Spain (AENOR) Sweden (SIS) Switzerland (SNV) Thailand (TISI) Ukraine (DTR)
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	United Arab Emirates (ESMA) United Kingdom (BSI) United States (ANSI)
* late vote	
Comments submitted (0)	
Votes not cast (12)	Algeria (IANOR) Austria (ASI) Estonia (EVS) Italy (UNI) Kazakhstan (KAZMEMST) Kenya (KEBS) Mauritius (MSB) Russian Federation (GOST R) Singapore (SPRING SG) Sri Lanka (SLSI) The Former Yugoslav Republic of Macedonia (ISRM) Uruguay (UNIT)

Questions:	
Q.1	"Do you agree with approval of the CD text?"
Q.2	"If you approve the CD text with comments, would you please indicate which type ? (General, Technical or Editorial)"
Q.3	"If you disapprove the draft, would you please indicate if you accept to change your vote to Approval if the reasons and appropriate changes will be accepted?"

Votes by members	Q.1	Q.2	Q.3
Australia (SA)	Disapproval of the draft	Ignore	Yes
Belgium (NBN)	Approval as presented	Ignore	Ignore
Brazil (ABNT)	Approval as presented	Ignore	Ignore
Canada (SCC)	Approval with comments	All	Ignore
China (SAC)	Approval as presented	Ignore	Ignore
Cyprus (CYS)	Approval as presented	Ignore	Ignore
Czech Republic (UNMZ)	Approval as presented	Ignore	Ignore
Denmark (DS)	Abstention	Ignore	Ignore
Finland (SFS)	Abstention	Ignore	Ignore
France (AFNOR)	Approval with comments	All	Ignore
Germany (DIN)	Approval with comments	All	Ignore
India (BIS)	Abstention	Ignore	Ignore
Ireland (NSAI)	Approval as presented	Ignore	Ignore
Israel (SII)	Abstention	Ignore	Ignore
Jamaica (BSJ)	Approval as presented	Ignore	Ignore
Japan (JISC)	Disapproval of the draft	Ignore	No
Korea, Republic of	Approval with	Technical	Ignore

(KATS)	comments		
Luxembourg (ILNAS)	Approval with comments	All	Ignore
Malaysia (DSM)	Abstention	Ignore	Ignore
Mexico (DGN)	Approval as presented	Ignore	Ignore
Morocco (IMANOR)	Abstention	Ignore	Ignore
Netherlands (NEN)	Abstention	Ignore	Ignore
New Zealand (SNZ)	Approval as presented	Ignore	Ignore
Norway (SN)	Approval as presented	Ignore	Ignore
Peru (INDECOPI)	Abstention	Ignore	Ignore
Poland (PKN)	Abstention	Ignore	Ignore
Romania (ASRO)	Abstention	Ignore	Ignore
Slovakia (SUTN)	Approval as presented	Ignore	Ignore
Slovenia (SIST)	Approval as presented	Ignore	Ignore
South Africa (SABS)	Abstention	Ignore	Ignore
Spain (AENOR)	Abstention	Ignore	Ignore
Sweden (SIS)	Approval with comments	All	Ignore
Switzerland (SNV)	Abstention	Ignore	Ignore
Thailand (TISI)	Approval as presented	Ignore	Ignore
Ukraine (DTR)	Approval as presented	Ignore	Ignore
United Arab Emirates (ESMA)	Abstention	Ignore	Ignore
United Kingdom (BSI)	Approval with comments	All	Ignore
United States (ANSI)	Disapproval of the draft	Ignore	Yes

Answers to Q.1: "Do you agree with approval of the CD text?"

14 x	Approval as presented	Belgium (NBN) Brazil (ABNT) China (SAC) Cyprus (CYS) Czech Republic (UNMZ) Ireland (NSAI) Jamaica (BSJ) Mexico (DGN) New Zealand (SNZ) Norway (SN) Slovakia (SUTN) Slovenia (SIST) Thailand (TISI) Ukraine (DTR)
7 x	Approval comments with	Canada (SCC) France (AFNOR) Germany (DIN) Korea, Republic of (KATS) Luxembourg (ILNAS) Sweden (SIS)

		United Kingdom (BSI)
3 x	Disapproval of the draft	Australia (SA) Japan (JISC) United States (ANSI)
14 x	Abstention	Denmark (DS) Finland (SFS) India (BIS) Israel (SII) Malaysia (DSM) Morocco (IMANOR) Netherlands (NEN) Peru (INDECOPI) Poland (PKN) Romania (ASRO) South Africa (SABS) Spain (AENOR) Switzerland (SNV) United Arab Emirates (ESMA)

Answers to Q.2: "If you approve the CD text with comments, would you please indicate which type ? (General, Technical or Editorial)"

0 x	General	
1 x	Technical	Korea, Republic of (KATS)
0 x	Editorial	
6 x	All	Canada (SCC) France (AFNOR) Germany (DIN) Luxembourg (ILNAS) Sweden (SIS) United Kingdom (BSI)
31 x	Ignore	Australia (SA) Belgium (NBN) Brazil (ABNT) China (SAC) Cyprus (CYS) Czech Republic (UNMZ) Denmark (DS) Finland (SFS) India (BIS) Ireland (NSAI) Israel (SII) Jamaica (BSJ) Japan (JISC) Malaysia (DSM) Mexico (DGN) Morocco (IMANOR) Netherlands (NEN) New Zealand (SNZ) Norway (SN) Peru (INDECOPI) Poland (PKN) Romania (ASRO) Slovakia (SUTN) Slovenia (SIST) South Africa (SABS) Spain (AENOR) Switzerland (SNV) Thailand (TISI) Ukraine (DTR) United Arab Emirates (ESMA) United States (ANSI)

Answers to Q.3: "If you disapprove the draft, would you please indicate if you accept to change your vote to Approval if the reasons and appropriate changes will be accepted?"

2 x	Yes	Australia (SA) United States (ANSI)
1 x	No	Japan (JISC)
35 x	Ignore	Belgium (NBN) Brazil (ABNT) Canada (SCC) China (SAC) Cyprus (CYS) Czech Republic (UNMZ) Denmark (DS) Finland (SFS) France (AFNOR) Germany (DIN) India (BIS) Ireland (NSAI) Israel (SII) Jamaica (BSJ) Korea, Republic of (KATS) Luxembourg (ILNAS) Malaysia (DSM) Mexico (DGN) Morocco (IMANOR) Netherlands (NEN) New Zealand (SNZ) Norway (SN) Peru (INDECOPI) Poland (PKN) Romania (ASRO) Slovakia (SUTN) Slovenia (SIST) South Africa (SABS) Spain (AENOR) Sweden (SIS) Switzerland (SNV) Thailand (TISI) Ukraine (DTR) United Arab Emirates (ESMA) United Kingdom (BSI)

Comments from Voters		
Member:	Comment:	Date:
Australia (SA)	<i>Comment File</i>	2013-09-02 08:35:14
CommentFiles/ISO_IEC CD 27018 - ISO-IECJTC1-SC27_N12546_SA.doc (see attachment 1)		
Canada (SCC)	<i>Comment File</i>	2013-09-17 16:57:55
CommentFiles/ISO_IEC CD 27018 - ISO-IECJTC1-SC27_N12546_SCC.doc (see attachment 2)		
Germany (DIN)	<i>Comment File</i>	2013-09-13 17:48:42
CommentFiles/ISO_IEC CD 27018 - ISO-IECJTC1-SC27_N12546_DIN.doc (see attachment 3)		
Japan (JISC)	<i>Comment File</i>	2013-08-23 16:51:39
CommentFiles/ISO_IEC CD 27018 - ISO-IECJTC1-SC27_N12546_JISC.doc (see attachment 4)		
Korea, Republic of (KATS)	<i>Comment File</i>	2013-09-16 07:50:44
CommentFiles/ISO_IEC CD 27018 - ISO-IECJTC1-SC27_N12546_KATS.doc (see attachment 5)		
Luxembourg (ILNAS)	<i>Comment File</i>	2013-06-19 10:00:41
CommentFiles/ISO_IEC CD 27018 - ISO-IECJTC1-SC27_N12546_ILNAS.doc (see attachment 6)		
Sweden (SIS)	<i>Comment File</i>	2013-09-09 15:28:29
CommentFiles/ISO_IEC CD 27018 - ISO-IECJTC1-SC27_N12546_SIS.doc (see attachment 7)		
United Kingdom (BSI)	<i>Comment File</i>	2013-09-09 20:04:39
CommentFiles/ISO_IEC CD 27018 - ISO-IECJTC1-SC27_N12546_BSI.doc (see attachment 8)		
United States (ANSI)	<i>Comment File</i>	2013-09-17 21:16:10
CommentFiles/ISO_IEC CD 27018 - ISO-IECJTC1-SC27_N12546_ANSI.doc (see attachment 9)		
France (AFNOR)	<u><i>Comment File</i></u>	2013-09-17 21:16:10
(see attachment 10)		

Comments from Commenters		
Member:	Comment:	Date: