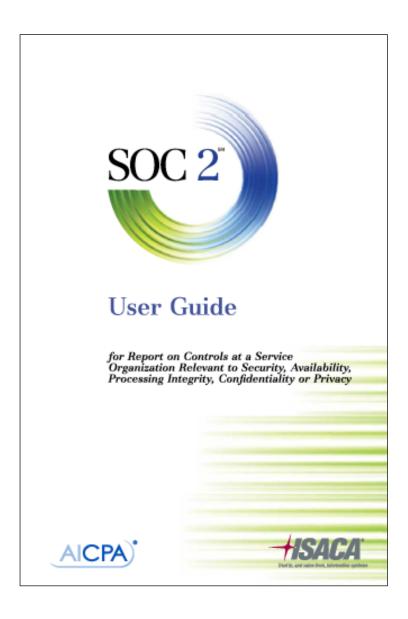
# SOC 2 / SOC 3 Service Organization Control report

Round table 3 November 2014



## What it is about







# What you can expect

FAC assurance reports	
SAE 3402 / SOC 1	
OC 2	
OC 3	
SACA en SOC 2 / SOC 3	



## Assurance reports

- ISACA
  - ITAF (IT assurance framework)



- AICPA
  - US GAAS



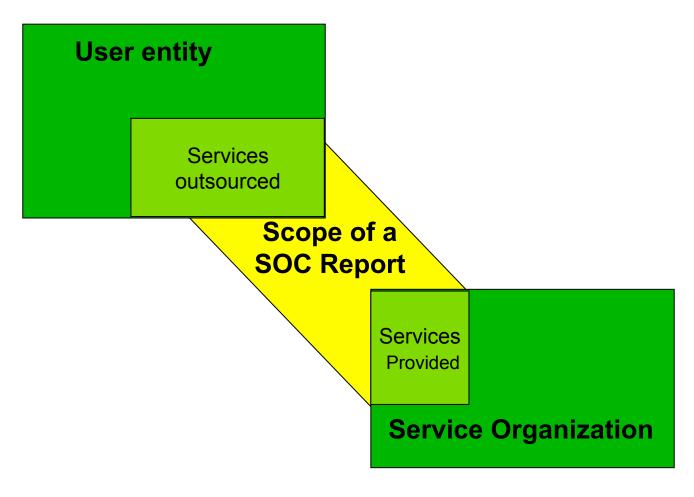
- Accountants rest of the world
  - IFAC, IAASB\*), ISAE standards



\*) International Auditing and Assurance Standards Board

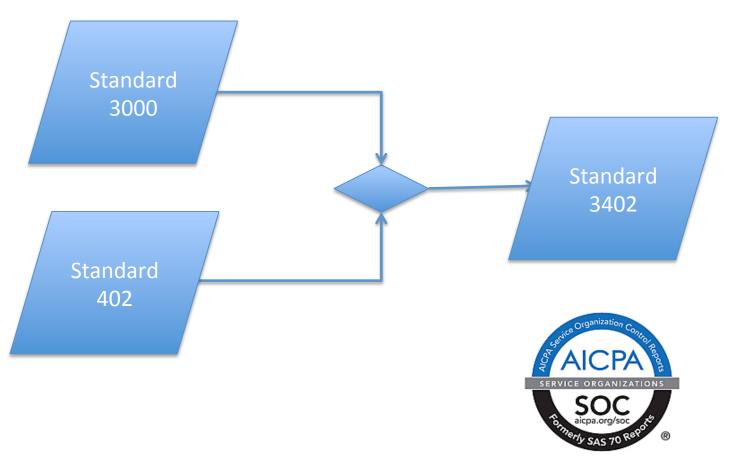


# Assurance regarding Service Organizations





# Standard 3402 / SOC 1



AICPA service organization logo



#### INTERNATIONAL STANDARD ON ASSURANCE ENGAGEMENTS (ISAE) 3402

### ASSURANCE REPORTS ON CONTROLS AT A SERVICE ORGANIZATION

(Effective for service auditors' assurance reports covering periods ending on or after June 15, 2011)

- 3. This ISAE applies only when the service organization is responsible for, or otherwise able to make an assertion about, the suitable design of controls. This ISAE <u>does not deal with</u> assurance engagements:
- (a) To report only on whether controls at a service organization operated as described, or
- (b) To report on controls at a service organization other than those related to a service that is likely to be relevant to user entities' internal control as it relates to financial reporting (for example, controls that affect user entities' production or quality control).



# IT Service organization

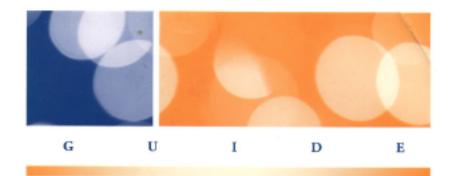
This ISAE, however, provides some guidance for such engagements carried out under ISAE 3000.



Answer AICPA for IT Service Organizations: SOC 2

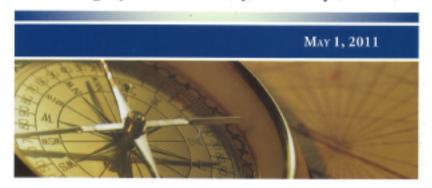
Based on US attestation standard AT 101 and Trust Services Principles and Criteria





## Reporting on Controls at a Service Organization

Relevant to Security, Availability, Processing Integrity, Confidentiality, or Privacy (SOC 2)





## Trust Services principles for SOC 2 and SOC 3

#### **Common Security Criteria** Organization and Monitoring of Controls management Logical and Physical Communications **Access Controls** Risk Management and **System Operations** Design and Change Management Implementation of Controls **Processing Availability** Confidentiality **Integrity** Accessibility Protect of Completeness of the system confidential validity, as committed information in accuracy, by contract, accordance timeliness, SLA, or other with the and agreements organization's authorization commitments of system processing and requirements

#### Privacy

In US and Europe under construction







### Trust services criteria

#### components in scope of the criteria

**Infrastructure**, physical IT structures

**Software**, application and IT system software

People, personnel involved in governance, operation and use

Processes, automated and manual

Data, transactions, files, databases

principle	Number of criteria
Security	28 common criteria
Availability	28 common + 3 additional
Processing Integrity	28 common + 6 additional
Continuity	28 common + 6 additional
Privacy	under construction

#### Type 1

Design and implementation

#### Type 2

Design and operational effectiveness



# Test work done by the auditor

#### Type 1

- Inquiry
- Inspection
- Observation



#### Type 2

- Inquiry
- Inspection
- Observation
- Re-performance

For SOC 2 / 3 minimum period of operating effectiveness not defined

## Illustration of common criteria CC6.0

Criteria		Risks				
			administration personnel.			
CC6.0	CC6.0 Common Criteria Related to System Operations					
CC6.1 Vulnerabilities of system components to [insert the principle(s) being reported on: security, availability, processing integrity, or confidentiality or any combination thereof] breaches and incidents due to malicious acts, natural disasters, or errors are monitored and evaluated and countermeasures are implemented to compensate for known and new vulnerabilities.		Vulnerabilities that could lead to a breach or incident are not detected in a timely manner.	Logging and monitoring software is used to collect data from system infrastructure components and endpoint systems and used to monitor system performance, potential security threats and vulnerabilities, resource utilization, and to detect unusual system activity or service requests. This software sends a message to the operations center and security organization and automatically opens a priority incident or problem ticket and change management system record item.			
			Call center personnel receive telephone and e- mail requests for support, which may include re- quests to reset user passwords or notify entity personnel of potential breaches and incidents. Call center personnel follow defined protocols for recording, resolving, and escalating received re- quests.			
		Security or other system configuration infor- mation is corrupted or otherwise destroyed, pre- venting the system from functioning as designed.	Weekly full-system and daily incremental back- ups are performed using an automated system.			
CC6.2	[Insert the principle(s) being reported on: security, availability, processing integrity, or confidentiality or any combination thereof] incidents, including logical and physical security breaches, failures, concerns, and other complaints are identified, reported to appropriate personnel, and acted on in accordance with established	Breaches and incidents are not identified, prioritized, or evaluated for effects.	Operations personnel follow defined protocols for evaluating reported events. Security related events are assigned to the security group for evaluation			

## **SOC 2 Report Structure**

#### Report structure

Auditor's Opinion

**Management Assertion** 

Description of system and entity level controls

Criteria

+

Controls, tests of operating effectiveness and results of tests

Other Information

Restricted use

Section 1 — Management of Example Cloud Service Organization's Assertion Regarding its Infrastructure Services System Throughout the Period January 1, 20X1, to December 31, 20X1

Section 2 — Independent Service Auditor's Report

Section 3 — Example Cloud Service Organization's Description of its Infrastructure Services System Throughout the Period January 1, 20X1, to December 31, 20X1

System Overview and Background

Infrastructure Software

People Procedures

Data

Customer Responsibilities

- Relevant Aspects of the Control Environment, Risk Assessment Process, Information and Communication Systems, and Monitoring
- B. Policies and Procedures
- C. Communication
- D. Physical Security
- E. Logical Security
- Monitoring
- G. Relationship between CCM Criteria, Description Sections, and Trust Services Criteria

Section 4 — Applicable Trust Services Principles, Criteria, and CCM Criteria and Related Controls, Tests of Controls, and Results of Tests

Section 5 – Other Information Provided by Example Cloud Service Organization Not Covered by the Service Auditor's Report





#### CSA Position Paper on AICPA Service Organization Control Reports<sup>™</sup>

February 2013









Financial Reporting Center

Illustrative Type 2 SOC 2<sup>SM</sup> Report with the Criteria in the Cloud Security Alliance (CSA) Cloud Controls Matrix (CCM)



The AICPA guide Reporting on Controls at a Service Organization Relevant to Security, Availability, Processing Integrity, Confidentiality, or Privacy (SOC  $2^{SM}$ ) specifies the components of a SOC  $2^{SM}$  report and the information to be included in each component, but it does not specify the format for these reports. Bervice organizations and service auditions may organize and present the required information in a variety of formats. The format of the illustrative type 2.80C a report presented in this document is meant to be illustrative rather than prescriptive. The illustrative report contains all of the components of a type 2.80C a report, Neweyer, for brevity, it does not include everything that may be described in a type 2.80C a report. Ellipses (...) or notes to readers indicate places where detail has been omitted.

The trust services principle(s) being reported, the controls specified by the service organization, and the tests performed by the service auditor are presented for illustrative purposes only. They are not intended to represent the principles that would be addressed in every type 2 800 2 engagement, or the controls, or tests of controls, that would be appropriate for all service organizations. The trust services principles on which the report is based, the controls a service organization would include in its description, and the tests of controls a service auditor would perform for a specific type 2 800 2 engagement will vary based on the specific facts and circumstances of the engagement. Accordingly, it is expected that actual type 2 800 2 reports will address different principles and include different controls and tests of controls that are tailored to the service organization that is the subject of the engagement.

The Cloud Security Alliance (CSA) Cloud Controls Matrix (CCM) Version 1.4 is used for the purpose of this illustrative report. The CSA periodically issues new criteria. The practitioner should identify the CCM version being used as criteria in management's assertion and the service auditor's report.

Trust Services Principles, Criteria, and illustrations for Security, Availability, Processing Integrity, Confidentiality, and Privacy (2009) is used for the purpose of this Illustrative report. The AICPA periodically issues new Trust Services Principles and Criteria. The practitioner should identify the current Trust Services Principles and Criteria version for management's assertion and the service availables seed.

alcpa.org/FRC



#### **CLOUD CONTROLS MATRIX VERSION 3.0**

Out of Breed	CCM V3.0	CCM V3.0			
Control Domain	Control ID	Control Specification	Phys	Network	
Application & Interface Security Application Security	AIS-01	Applications and interfaces (APIs) shall be designed, developed, and deployed in accordance with industry acceptable standards (e.g., OWASP for web applications) and adhere to applicable legal, statutory, or regulatory compliance obligations.		х	

#### SOC 2 User Guide



Download (813K; Free to Members Only)



Purchase the E-book



Purchase the Book

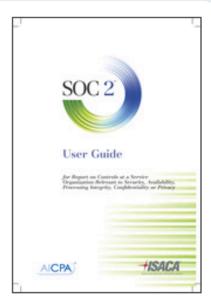


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SOC 2 is a Report on Controls at a Service Organization Relevant to Security, Availability, Processing Integrity, Confidentiality or Privacy. This guide is intended for those evaluating a service organization's SOC 2 report as part of a governance, risk and compliance (GRC) program; vendor assessment; security evaluation; business continuity plan or other control evaluation. It may also be useful to those considering requesting a SOC 2 report from an existing vendor that does not currently provide a report or a new vendor as part of the due diligence or request for proposal (RFP) process. Specific users of this guide might include:



- Management of the user entity
- Those in procurement and contract negotiation
- Those overseeing vendor management
- Practitioners evaluating or reporting on controls at a user entity
- Independent auditors of user entities
- Regulators
- . Those performing services related to controls at the service organization, such as a service auditor reporting on controls at a user entity that is also a service provider to other user entities

AICPA and ISACA have jointly released this guide to provide user entities with the information they need when interpreting the SOC 2 reports received from service organizations. This guide also complements the companion white paper titled New Service Auditor Standard: A User Entity Perspective available at www.isaca.org/service-auditorstandard.



Source: http://www.isaca.org/Knowledge-Center/Research/ResearchDeliverables/Pages/SOC-2-User-Guide.aspx

## SOC Reports for Different Scenarios

#### ISAE3402 /SOC1 Financial Reporting Controls

SOC2/SOC3
Operational Controls

- Financial services
- Asset management and custodial services
- Healthcare claims processing
- Payroll processing
- Payment processing

- Cloud ERP service
- Data center co-location
- IT systems management
- Cloud-based services (SaaS, PaaS, IaaS)
- HR services
- Security services
- Email, collaboration and communications services
- Any service where customers' primary concern is security, availability or privacy



## SOC 3

- Based on Trust Service Principles and Criteria.
- Short form report.
- For general use / distribution.
- Carve out of subservice provider(s) not permitted.
- Modified Opinion not allowed.



Source: https://www.dropboxatwork.com/tag/security/



# SOC 2 / SOC 3 Report Comparison

SOC 2

SOC 3

Includes detail on the service provider's controls, the auditor's detailed test procedures and the test results of those tests

Provides an overall conclusion on whether the service provider achieved the stated Trust Services

Principle

The report enables the reader to assess the service provider at a more granular level

Where the service detail and description of tests of controls and results are not needed by report users or where service providers may not be willing to share a detailed report



## Recap

## Service Organization Control Reports

Report	Scope/Focus	Summary	Applicability	Standard
Standard 3402 / SOC1 <sup>1M</sup>	Internal Control Over Financial Reporting	Detailed report for customers and their auditors	<ul> <li>Focused on financial reporting risks and controls specified by the service provider.</li> <li>Most applicable when the service provider performs financial transaction processing or supports transaction processing systems.</li> </ul>	ISAE 3402 / AT 101
SOC2 <sup>SM</sup>	Security, Availability, Processing Integrity, Confidentiality and/or Privacy	Detailed report for customers and specified parties	<ul> <li>Focused on Security, Confidentiality, Availability, Processing Integrity and/or Privacy.</li> <li>Applicable to a broad variety of systems.</li> </ul>	AT 101 / ISAE 3000
SOC3 <sup>SM</sup>	Same as SOC2 <sup>SM</sup> SOC3 Syritual for Service Organizations	Short report that can be generally distributed, with the option of displaying a web site seal	<ul> <li>Same as above without disclosing detailed controls and testing.</li> <li>Optionally, the service provider can post a Seal if they receive an unqualified opinion.</li> </ul>	AT 101 / ISAE 3000







# Responsibilities



These slides are intended solely for participants in the ISACA Netherlands round table of 3 November 2014 to support the explanations given and may not be used for other purposes.

