

Pilot 2 - Continuous Monitoring/Auditing Based Certification

# PILOT PREPARATION

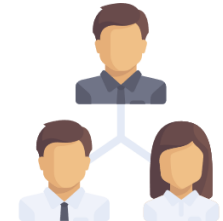
# Baseline

Trusted information sharing

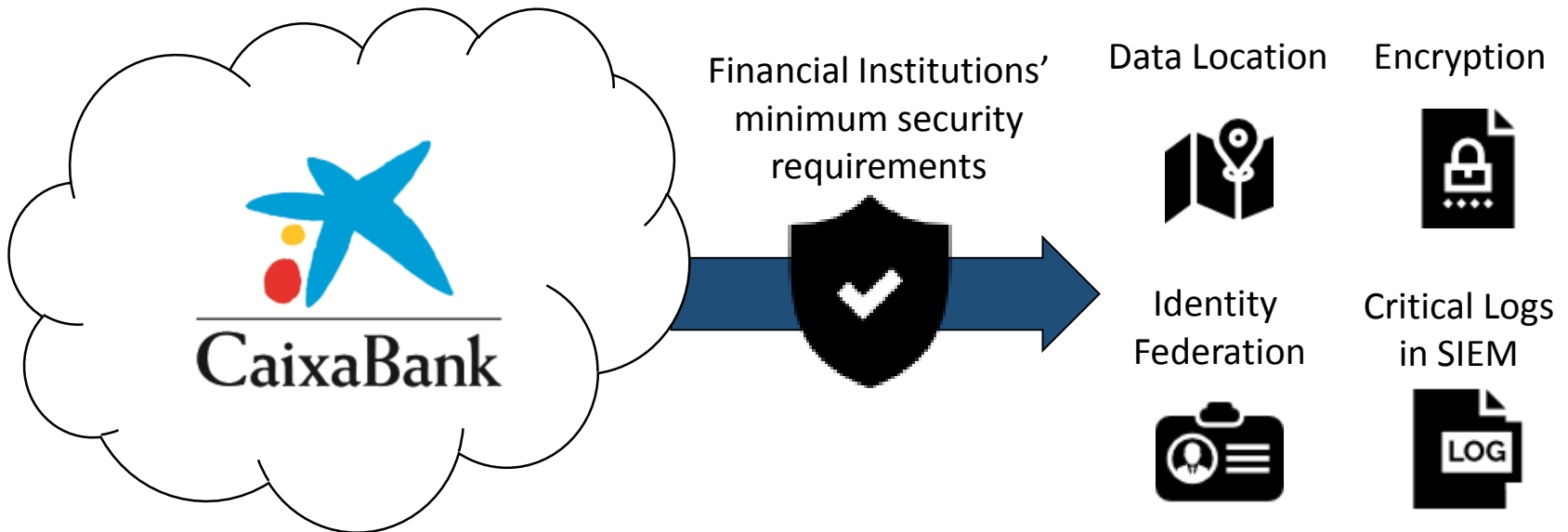
Financial institutions need to report sensible information to the regulators in a reliable and trusted way.

Collaboration

In some cases, this exchange of information can involve multiple entities and organisms.



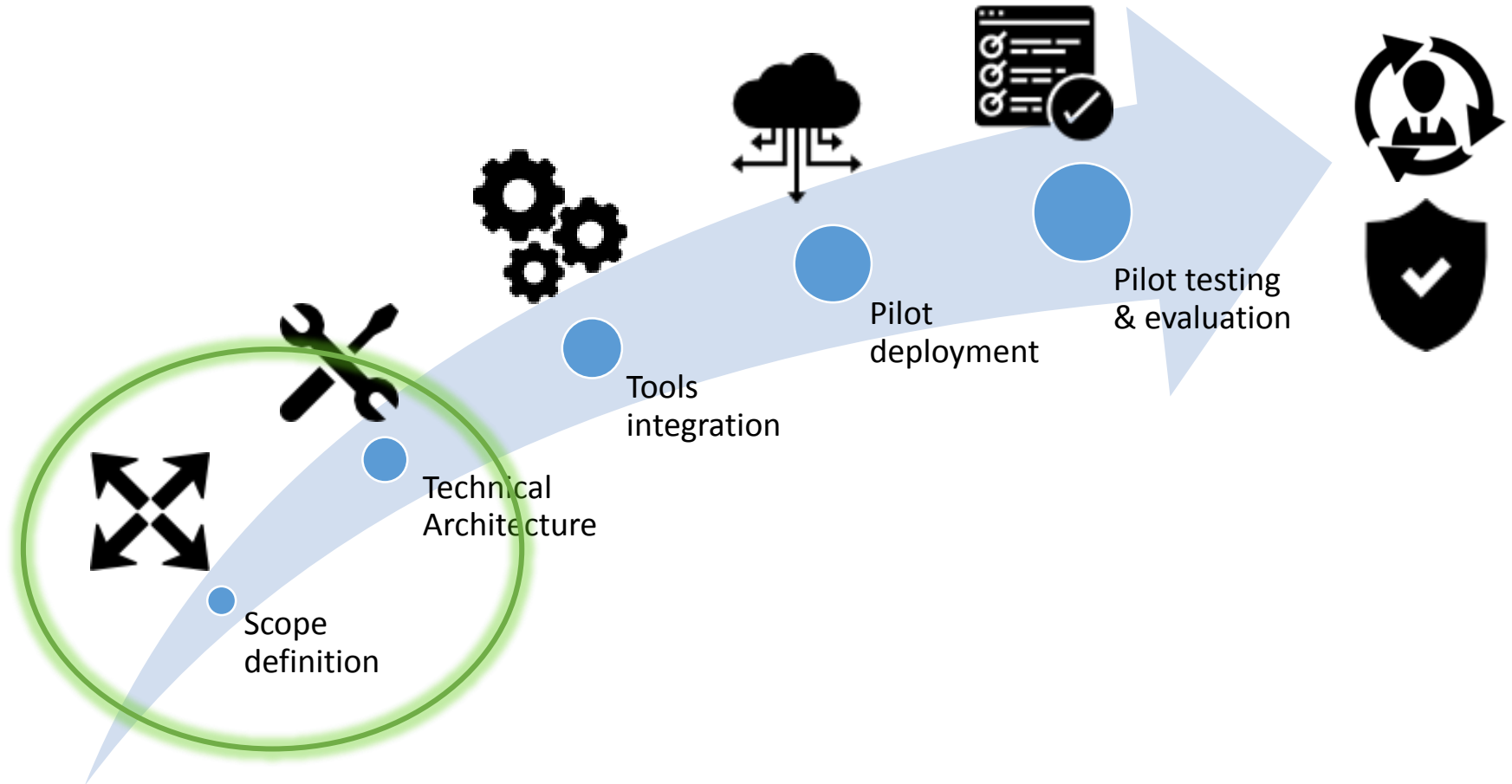
**Industrial gap motivation:** Lack of a continuous auditing service that verifies that the Cloud provider running the information sharing service actually complies with Financial Institutions' requirements.



**Goal: Continuous auditing of security requirements in a Financial Information Sharing (FISH) application with EU-SEC platform.**

# Pilot phases

---

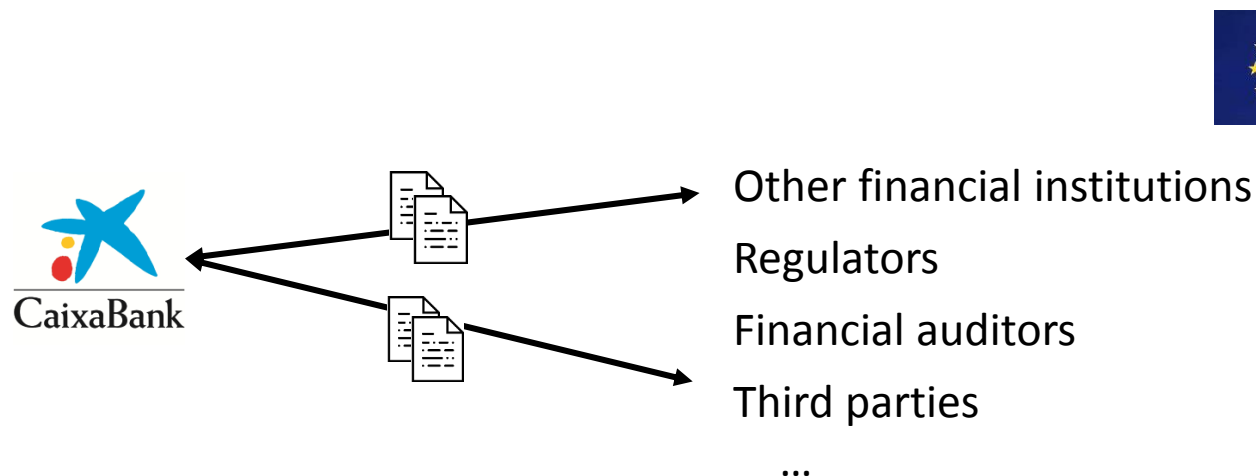


# Scope Definition - Problem statement

## Current scenario and problem statement:



- Regulatory entities **require banks to share information.**
- **Regulators may ask CaixaBank for confidential information** of accounts:
  - *Incidents' reporting with information of mule accounts for fraud and money laundering, terrorism, etc.*
  - *Periodical reports about security and privacy projects and procedures.*

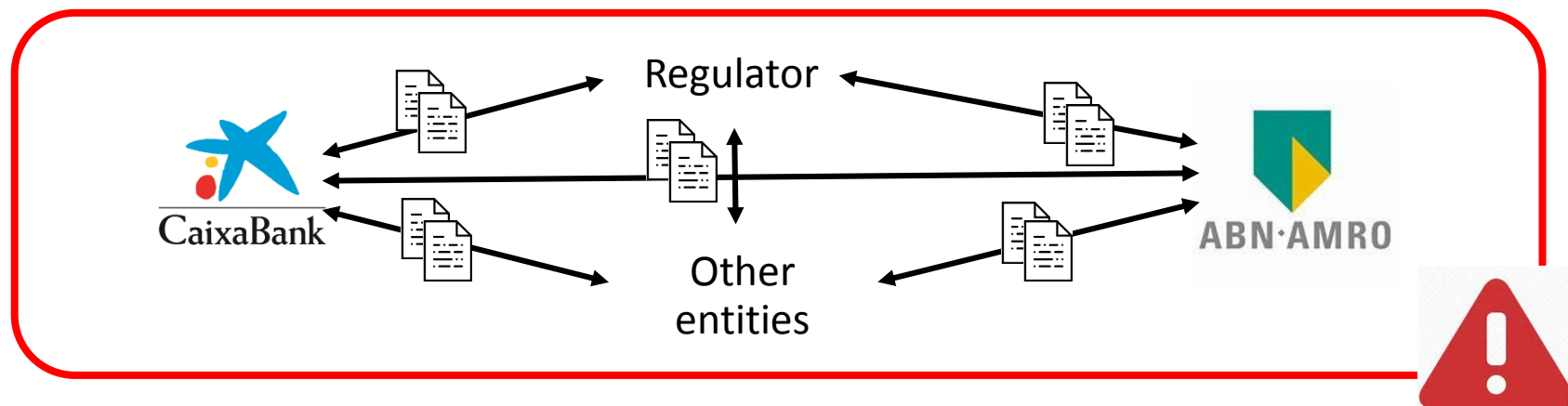


# Scope Definition - Problem statement

## Current scenario and problem statement:



- Information is **shared across groups of regulators/banks**:
  - A simple repository hosted by a bank cannot be trusted by others.
- This may lead to **bad practices and/or tedious document management**:
  - Report sensitive information via mail, physical sharing of information,...



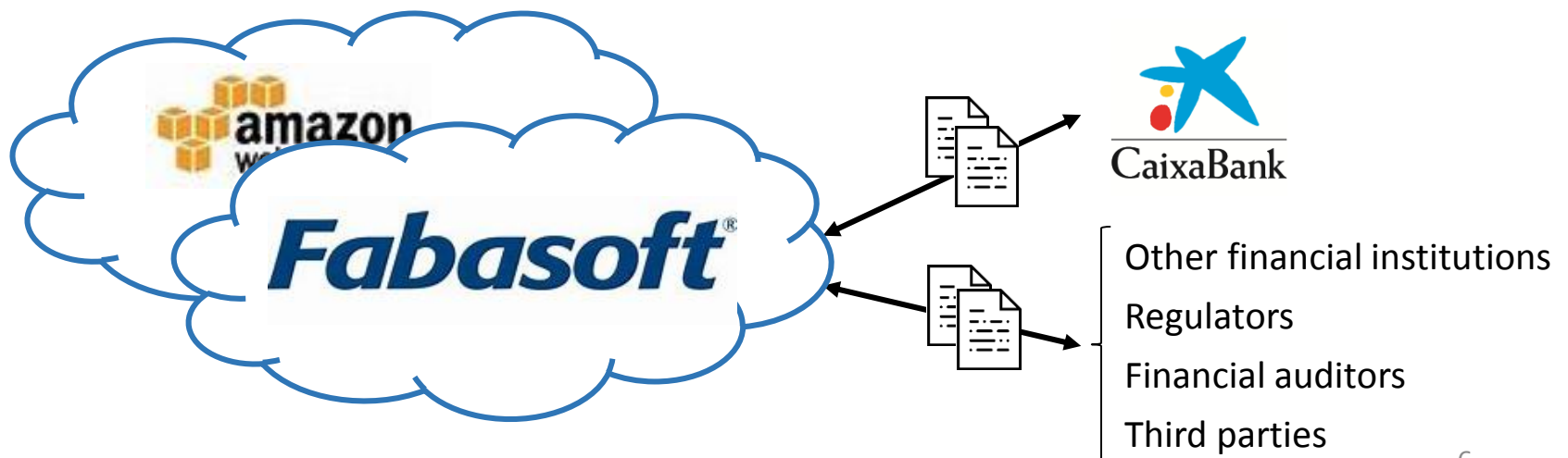
# Approach – Technical Architecture Definition

- Do we experience differences in auditing different **service models**, i.e. IaaS and SaaS?
- Can FISH and the auditing service **run in the same Cloud**?



FISH: Neutral European service used by both financial entities and regulators.

- Variation 1) Use **Fabasoft as a Cloud platform for information sharing (SaaS)**:
- Variation 2) **Build custom-tailored FISH application** using existing components, i.e. open source on top of a **commercial Cloud provider (IaaS)**



# Approach - Requirements definition

- CAIXABANK requirements identification

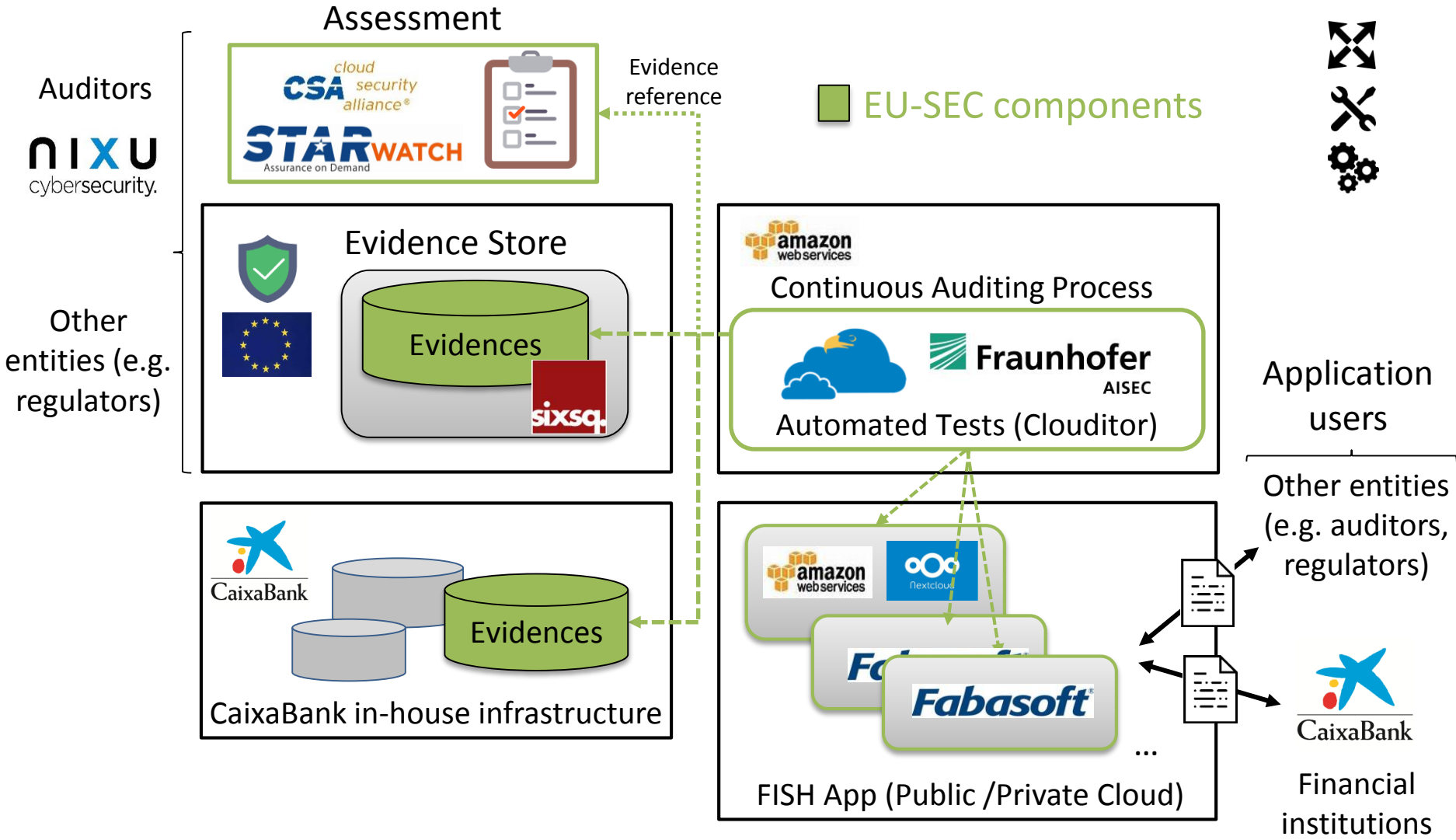


Requirements	Control	CCM code
<b>Data location</b>	The location of all sensitive data and its usage by applications and databases should be known. Moreover, all data should be located within European Economic Space.	CCM-GRM-02, CCM-STA-05
<b>Encryption</b>	All data should be encrypted both at rest and in transit. Cryptographic key management policies and procedures should be defined.	CCM-EKM-04, CCM-EKM-02
<b>Identity Federation</b>	Strong authentication of admin users. Access control and admin profiles should be defined.	CCM-IAM-12
<b>Critical logs in SIEM</b>	All monitoring and evidences logs should be stored in CaixaBank infrastructure.	CCM-IVS-01

- Which tools and tests can we use to audit continuously these controls?



# Results - Technical Architecture Overview





# Continuous Audit API (CA API)

---

- **Continuous Audit API**

- **CaApiDataLocation**

- GET `/scope/datalocation/{objectId}/storage/`

- **CaApiEncryption**

- GET `/scope/encryption/{objectId}/`

- **CaApilam**

- GET `/scope/identityfederation/admins/`
    - POST `/scope/identityfederation/data/access`
    - GET `/scope/identityfederation/{userId}/logins`
    - GET `/scope/identityfederation/{userId}/auth`
    - GET `/scope/identityfederation/{userId}/groups`

- **CaApiScope**

- GET `/scope/`

