

EasyCloud per Zucchetti HR Infinity & AGO - Strategie tecniche adottate per la compliance

Area adempimento GDPR – NIS2 -DORA	Componenti	EasyCloud for Zucchetti HR & AGO	Note / Riferimenti
Disponibilità – Integrità – del dato	• Connessione Internet e Bilanciatore HTTPS • Presentation Layer Pubblicazione Internet (Web Server - Apache)	• Tutte le componenti hardware e infrastrutturali sono ridondate e ove possibile bilanciate • Garantisce la disponibilità dei servizi per ospitare le applicazioni con SLA minimi del 98%¹ • Ogni comunicazione è cifrata con certificati SSL SHA 256 with RSA • I servizi sono oggetto di un piano di Disaster Recovery gestito e simulato periodicamente • Verifica continua delle prestazioni applicative, capacity planning settimanale. • Gestione continua degli aggiornamenti di sicurezza sulle componenti infrastrutturali • Possibilità d’incrementare i livelli di servizio standard per consentire di ridurre ulteriormente i rischi. Opzionalmente: replica geografica (sempre in Europa), SLA uguali o superiori al 99%, Piani di DR e BC personalizzati, Sistemi di cifratura dei dati aggiuntivi.	• (min ogni 12mesi) <

¹ Dato non tiene conto delle manutenzioni programmate dell'infrastruttura; ² Con attiva l'opzione FLASH lo SLA è del 99%.

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OPERATION ACTIVITIES	Rif. Controlli ISO27001	Frequenza minima				
		DAILY	WEEKLY	MONTHLY	ANNUAL	OTHERS FREQ.
Failed Backup check	8.13	Daily (Alert)				
Vulnerability Assessment	8.1; 8.25		Internally			Made from third part Every six moth
Penetration Test	8.1; 8.25					On demand with customer
Disaster Recovery Test					with Application support (Partner) and selected costumer	
Updates / Patches install (OS)			On Pres. Layer resources (Es. Web, App Srv)	For critical update (all remaining layers)		For not critical update Every three month
Updates / Patches install (Application)(Java, Tomcat, ...)	8.1; 8.25		Analysis			Based on software vendor certification
Capacity Planning	8.6; 8.14;8.27; 5.30			KPI Analysis and average usage		After receiving alert
Performance Monitor	8.5; 8.15;8.16		Analysis			After receiving alert
Log Analysis (Errors / Warning)	8.5; 8.15;8.16					After receiving alert
Change Management	8.9; 8.19; 8.26; 8.29, 8.31; 8.33; 8.34		Planning, Risk & Impact evaluation			
Problem Management			Open issues analysis (Incidents, Problems)			
Customer Satisfaction					Key and selected Customers	Feedback requested on tickets closing
User Rights review (Administrative)	5.15; 5.17; 5.18; 8.1; 8.6				Review	On organization changes (Role, Responsibility)
Risk Analysis (GDPR)					Review & Update	On significant changes
Security Awareness Training	6.3			Analysis		Continuous simulations
Cyber Security training	6.3		Weekly Sec. meeting			
Security Risk Analysis (attack surface)	8.1; 8.25, 8.16					Continuous verifications
Supplier Security Posture Evaluation	5.19-5.22					Continuous verifications

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Adempimento GDPR [Rif. ISO27001]	Strategia / Implementazione adottata				
Governance	Sigemi non ha informazioni certe sulla natura dei dati che transitano sulle piattaforme di servizi offerte ai clienti; pertanto, ha deciso di considerare tutti i dati come “Dati Particolari”.				
Collocazione Dati	I dati gestiti sulle piattaforme sono situati in Europa (Belgio, Olanda). I backup dei dati sono collocati in Europa (Olanda, Germania e Francia).				
Analisi del rischio e degli impatti	Sigemi esegue una analisi annuale dei rischi coinvolgendo il responsabile del trattamento dei dati. Sigemi, su richiesta, può fornire le informazioni, nonché il supporto al Titolare nello svolgimento di una valutazione d’impatto, qualora lo stesso fosse tenuto ad effettuarla. vulnerability assessment, eseguito ogni 7gg internamente e ogni 6 mesi da società esterna indipendente.				
Privacy By Design	Le impostazioni di base previste dalle procedure in essere in Sigemi prevedono la privacy by design, by default e least privileged Il personale Sigemi è formato continuamente sui temi della sicurezza e privacy secondo quanto indicato nel GDPR.				
	Certificazioni Infrastrutturali	 ISO/IEC 27001 ISO/IEC 27017 ISO/IEC 27018	 SOC 1 SSAE16 / ISAE 3402 (SOC 2/3)		
Integrità	Tutti i dati sono salvati con frequenza minima giornaliera in locale e off-cloud. I dati sono cifrati. La retention dei backup è definita nello SLA di ogni singolo servizio erogato. Il cliente può esprimere la necessità di requisiti differenti dallo standard che possono essere soddisfatti da servizi opzionali.				
[]	Tutte le componenti critiche per garantire la disponibilità del servizio sono ridondate. Il piano di Disaster Recovery viene testato almeno ogni 12 mesi. SLA di ripristino:				
	Componenti / Layer	Google vDataCenter		GCP vDataCenter	
		RTO	RPO	Business Continuity Strategy	Infrastr. SLA / Mese
	• Internet connection	n.a	n.a	Premium Tier (Bilanciamento)	>= 99.99%
	• Bilanciatore HTTPS e WAF	n.a	n.a		
	• Web Servers	2h	24h	Bilanciamento Applicativo in data center differenti (GCP Zone)	
	• Application Servers	2h	24h		
	• Data Base Server	4h	24h		>= 99.5%
	• File Share (NFS)	2h	24h		>= 99.5%
	• Back-end Networking	4h	n.a		>= 99.99%
	• Altri Server	8h	24h		>= 99.5%
Diritto cancellazione	Sigemi provvede alla cancellazione sicura di tutti i dati del cliente alla chiusura del contratto. <i>(cancellazione effettiva dei dati dopo i tempi di retention dei backup)</i>				
Data Breach	Sigemi ha adottato sistemi di log collection degli eventi di accesso amministrativo ai server e al database per rilevare prontamente possibili violazioni dell’integrità e confidenzialità dei dati dei propri clienti. Sigemi si è dotata di una procedura di gestione degli incidenti di sicurezza conforme alle normative GDPR, NIS2 e DORA				
Riferimenti	https://cloud.google.com/terms/sla https://cloud.google.com/network-tiers				

GCP - EasyCloud per Zucchetti HR Infinity & Ago - Log Retention

Log Type [Rif. ISO27001 8.5; 8.15;8.16, 8.13]	Windows Platform		Linux Platform		Network Services		Note
	Collection Method	Retention	Collection Method	Retention	Collection Method	Retention	
Security							
Autenticazione	WinEvt + log collection	365	Local-SystemLog + Bucket	365			
Creazione / Modifica utenze e Gruppi			GCP Log	400	GCP Log	400	
Configuration Mgmt							
Modifica configurazione hardware (Virtuale)	GCP Log	400	GCP Log	400			
Parametri di sistema (installazione, ...)	WinEvt + log collection	365	WinEvt + log collection	365			
Network Operative System	WinEvt + log collection	365	Local-SystemLog + Bucket GCP Log	365 400	GCP Log	400	
Application (SQL, Scheduler, FTP Serv,... Catalina, Apache, Postifix,...)							
Backup							
	Log + GCP Log	400	Log + GCP Log	400	na	na	

EasyCloud per Zucchetti HR Infinity & AGO – Compliance Strategies [ENG version]

GDPR – NIS2 -DORA compliance topics	Componenti	EasyCloud for Zucchetti HR & AGO	Note / Riferimenti
Data Availability – Integrity	- Internet Connection and HTTPS Load Balancer - Presentation Layer (Web Server - Apache)	- All hardware and infrastructure components are redundant and, where possible, balanced. - Ensures service availability to host applications with minimum SLA of 98%¹. - All communications are encrypted with SSL SHA 256 with RSA certificates. - Services are subject to a managed and periodically simulated Disaster Recovery plan. - Continuous monitoring of application performance and weekly capacity planning are conducted. - Ongoing management of security updates for infrastructure components is performed.	
		Increasing standard service levels to further reduce risks, it's possible as optional . Optionally: geographical replication (always within Europe), SLAs equal to or greater than 99%, customized DR and BC Plans, additional data encryption systems.	Optional Services
Data Controller and/or Data Processor Reliability	Application Layer (JVM - Apache Tomcat)	- All components are monitored to ensure service performance, availability, and data integrity. - Every event and activity is tracked in a ticketing system. - The audit functionalities for access and usage of its resources make it possible to identify any incorrect data access and respond quickly to intrusion.	Conformity is also determined by the application configuration applied in the start-up phase by the application partner.
Data Breach	Data Layer (DB SQL e DMS)		
Data Location(SEE)	Infrastructure layer (local area network , hardware, power supply)	- Data in Europe: data are located in Europe (Belgium, Holland, Germany and France). - Production environment in Belgium, Disaster Recovery Netherlands, data backups on a different cloud infrastructures respect production enviroment; France and Germany) - All data is encrypted AT REST and in transit. [Advanced Encryption Standard (AES) algorithm, AES-256] - All backups are encrypted. - Comprehensive Annual Disaster Recovery simulation involving partners and customers.	Monthly GDPR reports; Optional addon customizations for specific compliance requirements
Privacy By Design/ Privacy By Default	- Backup dati - Data Encryption - DR Environment	- Administrative access is based on limited and specifically assigned roles. All technicians involved in the management of the infrastructure have personal administrative credentials with two-factor authentication to access it and to access their own computer. - All administrative activities on the infrastructure, system logs of all servers are recorded (Audit / Log), allowing the origin of data access (what, when, who and how) to be known. - Each layer of the infrastructure and service is designed to isolate customers' data. - Local and backend networks are segmented to isolate access and communication.	
Governance / Compliance Maintenance	- Compliance achievement is a continuous process that cyclically unfolds in the phases of analysis - implementation - control. This continuous process and the security measures is proportional to the risks require investments that only economies of scale can ensure. It is emphasized that compliance with the standard is determined both by how the infrastructure is implemented and managed, and by the software and its configuration. - Below are the internal procedures that contribute to Service compliance:: Availability and Continuity ; Backup & Restore ; Change Management ; Vulnerability & Update ; Incident Mgmt ; Disaster Recovery		

¹Value don't include planed infrastructure maintenance ; ² FLASH Subscription have a availability SLA off 99%.

EasyCloud per Zucchetti HR Infinity & AGO – Compliance Strategies [ENG version]

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EasyCloud per Zucchetti HR Infinity & AGO – Compliance Strategies [ENG version]

GDPR and ISO27001 ref.	Solutions and Strategies adopted			
Governance	Sigemi has no certain information on the kind of data passing through the service platforms offered to customers; therefore, it has decided to consider all data as "Particular Data".			
Data Location	The data managed on the platforms are located in Europe (Belgium, the Netherlands). Data backups are located in Europe (the Netherlands, Germany and France).			
Risk Analysis	Sigemi carries out an annual risk analysis involving the data controller. Sigemi, upon request, can provide information as well as support to the Data Controller in carrying out an impact assessment, should he be required to do so. vulnerability Assessment, carried out every 7 days internally and every 6 months by an independent external company.			
Privacy By Design	The default settings in Sigemi's existing procedures provide for privacy by design, by default and least privileged Sigemi's staff is continuously trained on security and privacy issues according to the GDPR.			
	Certifications	 ISO/IEC 27001 ISO/IEC 27017 ISO/IEC 27018	 SOC 1 SSAE16 / ISAE 3402 (SOC 2/3)	
Integrity	All data are saved at least daily in the local and off-cloud. Data are encrypted. Backup retention is defined in the SLA of each individual service provided. The customer may express the need for different requirements from the standard that can be fulfilled by optional services.			
[]	All critical components to ensure service availability are redundant. The Disaster Recovery plan is tested at least every 12 months. Recovery SLA:			
	Componenti / Layer	Google vDataCenter		GCP vDataCenter
		RTO	RPO	
	• Internet connection	n.a	n.a	Premium Tier (Balanced)
	• http/s Balancer and WAF	n.a	n.a	
	• Web Servers	2h	24h	Application Balancing to different data centers (GCP Zone)
	• Application Servers	2h	24h	
	• Data Base Server	4h	24h	>= 99.5%
	• File Share (NFS)	2h	24h	>= 99.5%
	• Back-end Networking	4h	n.a	>= 99.99%
	• Other Servers	8h	24h	>= 99.5%
Delete rights	Sigemi execute secure deletion of all customer data at the end of the contract. (complete delete of data after backup retention times)			
Data Breach	Sigemi has adopted logging solution to collect administrative access events on server and database ; in order to promptly detect possible breaches of the integrity and confidentiality of its customers' data. Sigemi has a security incident management procedure that complies with the GDPR, NIS2 and DORA regulations.			
Reference	https://cloud.google.com/terms/sla https://cloud.google.com/network-tiers			

EasyCloud per Zucchetti HR Infinity & AGO – Compliance Strategies [ENG version]

Log Retention

Log Type [Ref. ISO27001 8.5; 8.15;8.16, 8.13]	Windows Platform		Linux Platform		Network Services		Note
	Collection Method	Retention	Collection Method	Retention	Collection Method	Retention	
Security							
Authentications	WinEvt + log collection	365	Local-SystemLog + Bucket	365			
Users and Groups creation/change			GCP Log	400	GCP Log	400	
Configuration Mgmt							
vServer configurations changes	GCP Log	400	GCP Log	400			
Infr, settings changes (setup, ...)	WinEvt + log collection	365	WinEvt + log collection	365			
Network Operative System	WinEvt + log collection	365	Local-SystemLog + Bucket	365	GCP Log	400	
Application (SQL, Scheduler, FTP Serv,... Catalina, Apache, Postifix,...)			GCP Log	400			
Backup	Log + GCP Log	400	Log + GCP Log	400	na	na	