CAIQv3.1

CONSENSUS ASSESSMENTS INITIATIVE QUESTIONNAIRE v3.1 - Morolabs srl (May 2021)

The information described in this paper is detailed as of the time of authorship.
The information in this document does not amend or in any way alter Morolabs's security obligations as part of its contractual agreement with Customer.
Morolabs may discontinue or change the processes, procedures and controls described in this document at any time without notice.

Control Domain	Control ID	Question ID	Control Specification	Consensus Assessment Questions	Consensus Assessment Answers			Notes
					Yes	No	Not Applicable	
Application & Interface Security *Application Security*	AIS-01	AIS-01.1	Applications and programming interfaces (APIs) shall be designed, developed, deployed, and tested in accordance with leading industry standards (e.g., OWASP for web applications) and adhere to applicable legal, statutory, or regulatory compliance obligations.	Do you use industry standards (i.e. OWASP Software Assurance Maturity Model, ISO 27034) to build in security for your Systems/Software Development Lifecycle (SDLC)?	X			Morolabs implements OWASP SAMM in combination with ISO 9001: 2015 procedures in order to create products in a security by design logic throughout the development life cycle.
		AIS-01.2		Do you use an automated source code analysis tool to detect security defects in code prior to production?		X		
		AIS-01.3		Do you use manual source-code analysis to detect security defects in code prior to production?	X			Manual spot checks are performed on code based on risk and including ad-hoc third party validation efforts.
		AIS-01.4		Do you verify that all of your software suppliers adhere to industry standards for Systems/Software Development Lifecycle (SDLC) security?	X			
		AIS-01.5		(SaaS only) Do you review your applications for security vulnerabilities and address any issues prior to deployment to production?	X			Vulnerability checks are carried out with each release and new installation environment
Application & Interface Security *Customer Access Requirements*	AIS-02	AIS-02.1	Prior to granting customers access to data, assets, and information systems, identified security, contractual, and regulatory requirements for customer access shall be addressed.	Are all identified security, contractual, and regulatory requirements for customer access contractually addressed and remediated prior to granting customers access to data, assets, and information systems?	X			Before using Morolabs products, customers are required to review and agree with the acceptable use of data and SaaS, as well as security and privacy requirements, which are defined the Terms of Service in the contract. Morolabs utilizes cloud infrastructure providers that are ISO 27001 compliant and AgID qualified. The principles of privacy by default and privacy by design are respected in accordance with the provisions of the GDPR for the protection of personal data. Additional information concerning the security and privacy of Morolabs services and product may be found within the
		AIS- 02.2		Are all requirements and trust levels for customers' access defined and documented?	X			See AIS-02.1 response above

Application & Interface Security *Data Integrity*	AIS-03	AIS-03.1	Data input and output integrity routines (i.e., reconciliation and edit checks) shall be implemented for application interfaces and databases to prevent manual or systematic processing errors, corruption of data, or misuse.	Does your data management policies and procedures require audits to verify data input and output integrity routines?	X			Https (TLS) is provided for all installation to ensure integrity of data in transit. Morolabs products utilizes relational databases to manage the integrity of feature datasets uploaded by customers. Cloud infrastructure providers are AgID qualified, compliant with ISO 27001 and ensure data integrity is maintained through all phases including transmission, storage and processing
		AIS-03.2		Are data input and output integrity routines (i.e. MD5/SHA checksums) implemented for application interfaces and databases to prevent manual or systematic processing errors or corruption of data?		X		Input and output management in application include strong data typing that reduce risk about data integrity
Application & Interface Security *Data Security / Integrity*	AIS-04	AIS-04.1	Policies and procedures shall be established and maintained in support of data security to include (confidentiality, integrity, and availability) across multiple system interfaces, jurisdictions, and business functions to prevent improper disclosure, alternation, or destruction	Is your Data Security Architecture designed using an industry standard (e.g., CDSA, MULITSAFE, CSA Trusted Cloud Architectural Standard, FedRAMP, CAESARS)?		X		
Audit Assurance & Compliance *Audit Planning*	AAC-01	AAC-01.1	Audit plans shall be developed and maintained to address business process disruptions. Auditing plans shall focus on reviewing the effectiveness of the implementation of security operations. All audit activities must be agreed upon prior to executing any audits.	Do you develop and maintain an agreed upon audit plan (e.g., scope, objective, frequency, resources,etc.) for reviewing the efficiency and effectiveness of implemented security controls?	X			ISO/IEC 27001 internal audit completed annually following structured methodology
		AAC-01.2		Does your audit program take into account effectiveness of implementation of security operations?	X			An annual security assessment is performed by a 3rd party organization. A summary assessment report can be obtained with an NDA in place
Audit Assurance & Compliance *Independent Audits*	AAC-02	AAC-02.1	Independent reviews and assessments shall be performed at least annually to ensure that the organization addresses nonconformities of established policies, standards, procedures, and compliance obligations.	Do you allow tenants to view your SOC2/ISO 27001 or similar third-party audit or certification reports?	X			Morolabs solution is annually assessed/audited by a 3rd party assessor as per AgID qualification requirements.
		AAC-02.2		Do you conduct network penetration tests of your cloud service infrastructure at least annually?	X			Penetration testing is required for alignment with AgID qualification; pentesting OWASP is performed ad-hoc by a 3rd party periodically or as necessary.
		AAC-02.3		Do you conduct application penetration tests of your cloud infrastructure regularly as prescribed by industry best practices and guidance?	X			Delegated to the cloud provider
		AAC-02.4		Do you conduct internal audits at least annually?	X			Annually assessed/audited by a 3rd party assessor ISO 9001:2015
		AAC-02.5		Do you conduct independent audits at least annually?	X			See AAC-02.4 response above
		AAC-02.6		Are the results of the penetration tests available to tenants at their request?		X		3rd party pentest results are not disseminated externally.

		AAC-02.7		Are the results of internal and external audits available to tenants at their request?	X			The results from the annual security assessments are available in a summary report. This can be provided to clients upon signing an NDA.

Audit Assurance & Compliance *Information System Regulatory Mapping*	AAC-03	AAC-03.1	Organizations shall create and maintain a control framework which captures standards, regulatory, legal, and statutory requirements relevant for their business needs. The control framework shall be reviewed at least annually to ensure changes that could affect the business processes are reflected.	Do you have a program in place that includes the ability to monitor changes to the regulatory requirements in relevant jurisdictions, adjust your security program for changes to legal requirements, and ensure compliance with relevant regulatory requirements?	X			All customer data in Morolabs SaaS is encrypted on demand, partial or full. Also, every customer organization has their own logically separated instance or database for hosted feature service data.
Business Continuity Management & Operational Resilience *Business Continuity Planning*	BCR-01	BCR-01.1	A consistent unified framework for business continuity planning and plan development shall be established, documented, and adopted to ensure all business continuity plans are consistent in addressing priorities for testing, maintenance, and information security requirements. Requirements for business continuity plans include the following: • Defined purpose and scope, aligned with relevant dependencies • Accessible to and understood by those who will use them • Owned by a named person(s) who is responsible for their review, update, and approval • Defined lines of communication,	Does your organization have a plan or framework for business continuity management or disaster recovery management?	X			Morolabs Cloud Infrastructure providers have capabilities of providing maximum resiliency against system disruptions from multiple data centers in different regions and availability zones, only in EU countries.
		BCR-01.2		Do you have more than one provider for each service you depend on?	X			Morolabs uses only CSP AgID qualified but does not failover services from one of the provider to the other.
		BCR-01.3		Do you provide a disaster recovery capability?	X			Provided by CSP
		BCR-01.4		Do you monitor service continuity with upstream providers in the event of provider failure?	X			Service is provided by CSP from other site
		BCR-01.5		Do you provide access to operational redundancy reports, including the services you rely on?	X			On request and regulated by terms.
		BCR-01.6		Do you provide a tenant-triggered failover option?	X			On request and regulated by terms.
		BCR-01.7		Do you share your business continuity and redundancy plans with your tenants?	X			This can be provided to clients upon signing an NDA.
Business Continuity Management & Operational Resilience *Business Continuity Testing*	BCR-02	BCR-02.1	Business continuity and security incident response plans shall be subject to testing at planned intervals or upon significant organizational or environmental changes. Incident response plans shall involve impacted customers (tenant) and other business relationships that represent critical intra-supply chain business process dependencies.	Are business continuity plans subject to testing at planned intervals or upon significant organizational or environmental changes to ensure continuing effectiveness?	X			Morolabs business continuity plan is tested at planned intervals and involves the following: roles and responsibilities of key personnel, notification and escalation procedures, recovery plans, recovery time objective (RTO) and recovery point objective (RPO) and a clearly defined communication process.
Business Continuity Management & Operational Resilience *Power / Telecommunications*	BCR-03	BCR-03.1	Data center utilities services and environmental conditions (e.g., water, power, temperature and humidity controls, telecommunications, and internet connectivity) shall be secured, monitored, maintained, and tested for continual effectiveness at planned intervals to ensure protection from unauthorized interception or damage, and designed with automated fail-over	Does your organization adhere to any international or industry standards when it comes to securing, monitoring, maintaining and testing of datacenter utilities services and environmental conditions?			X	Morolabs uses third party CSP AgID qualified
		BCR-03.2		Has your organization implemented environmental controls, fail-over mechanisms or other redundancies to secure utility services and mitigate environmental conditions?			X	Morolabs uses third party CSP AgID qualified

Business Continuity Management & Operational Resilience Documentation	BCR-04	BCR-04.1	Information system documentation (e.g., administrator and user guides, and architecture diagrams) shall be made available to authorized personnel to ensure the following: • Configuring, installing, and operating the information system • Effectively using the system's security features	Are information system documents (e.g., administrator and user guides, architecture diagrams, etc.) made available to authorized personnel to ensure configuration, installation and operation of the information system?	X			Morolabs authorized administrators for SaaS products security program have access architectural and user guides for administration purposes.
Business Continuity Management & Operational Resilience *Environmental Risks*	BCR-05	BCR-05.1	Physical protection against damage from natural causes and disasters, as well as deliberate attacks, including fire, flood, atmospheric electrical discharge, solar induced geomagnetic storm, wind, earthquake, tsunami, explosion, nuclear accident, volcanic activity, biological hazard, civil unrest, mudslide, tectonic activity, and other forms of natural or man-made disaster shall be anticipated, designed, and have countermeasures applied.	Is physical damage anticipated and are countermeasures included in the design of physical protections?			X	Morolabs uses third party CSP AgID qualified
Business Continuity Management & Operational Resilience *Equipment Location*	BCR-06	BCR-06.1	To reduce the risks from environmental threats, hazards, and opportunities for unauthorized access, equipment shall be kept away from locations subject to high probability environmental risks and supplemented by redundant equipment located at a reasonable distance.	Are any of your data centers located in places that have a high probability/occurrence of high-impact environmental risks (floods, tornadoes, earthquakes, hurricanes, etc.)?		X		Morolabs uses third party CSP AgID qualified
Business Continuity Management & Operational Resilience *Equipment*	BCR-07	BCR-07.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, for equipment maintenance ensuring continuity and	Do you have documented policies, procedures and supporting business processes for equipment and datacenter maintenance?			X	Morolabs uses third party CSP AgID qualified
		BCR-07.2		Do you have an equipment and datacenter maintenance routine or plan?			X	Morolabs uses third party CSP AgID qualified
Business Continuity Management & Operational Resilience *Equipment Power Failures*	BCR-08	BCR-08.1	Protection measures shall be put into place to react to natural and man-made threats based upon a geographically-specific business impact assessment.	Are security mechanisms and redundancies implemented to protect equipment from utility service outages (e.g., power failures, network disruptions, etc.)?			X	Morolabs uses third party CSP AgID qualified
Business Continuity Management & Operational Resilience *Impact Analysis*	BCR-09	BCR-09.1	There shall be a defined and documented method for determining the impact of any disruption to the organization (cloud provider, cloud consumer) that must incorporate the following: • Identify critical products and services • Identify all dependencies, including	Do you use industry standards and frameworks to determine the impact of any disruption to your organization (i.e. criticality of services and recovery priorities, disruption tolerance, RPO and RTO etc) ?	X			Inspired but not ISO 22301 certified
		BCR-09.2		Does your organization conduct impact analysis pertaining to possible disruptions to the cloud service?	X			Inspired but not ISO 22301 certified

Business Continuity Management & Operational Resilience *Policy*	BCR-10	BCR-10.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, for appropriate IT governance and service management to ensure appropriate planning, delivery and support of the organization's IT capabilities supporting business functions, workforce, and/or customers based on industry acceptable standards (i.e., ITIL v4 and COBIT 5). Additionally, policies and procedures shall include defined roles and responsibilities supported by regular workforce training.	Are policies and procedures established and made available for all personnel to adequately support services operations' roles?	X			Morolabs has a detailed Roles and Responsibilities Matrix as part of the System Security Plan (SSP) with supporting security training materials. Morolabs employees accessing SaaS must sign a Rules of Behavior (RoB) that outlines employee technical and organizational responsibilities related to access and use, in accordance with Italian law about System Administration.
Business Continuity Management & Operational Resilience *Retention Policy*	BCR-11	BCR-11.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, for defining and adhering to the retention period of any critical asset as per established policies and procedures, as well as applicable legal, statutory, or regulatory compliance obligations. Backup and recovery measures shall be incorporated as part of business continuity planning and tested accordingly for effectiveness.	Do you have technical capabilities to enforce tenant data retention policies?	X			Morolabs customers always have complete ownership of their data. Customer datasets are deleted within 60 days of contract termination unless otherwise specified by the customer.
		BCR-11.2		Do you have documented policies and procedures demonstrating adherence to data retention periods as per legal, statutory or regulatory compliance requirements?	X			Morolabs not disclose Customer Data to any 3rd parties unless required by law.
		BCR-11.3		Have you implemented backup or recovery mechanisms to ensure compliance with regulatory, statutory, contractual or business requirements?	X			Provided by CSP
		BCR-11.4		If using virtual infrastructure, does your cloud solution include independent hardware restore and recovery capabilities?	X			Morolabs uses cloud infrastructure providers whose datacenters comply with industry standards (such as ISO 27001) for physical security and availability.
		BCR-11.5		If using virtual infrastructure, do you provide tenants with a capability to restore a virtual machine to a previous configuration?	X			On demand
		BCR-11.6		Does your cloud solution include software/provider independent restore and recovery capabilities?	X			If not implement by CSP is always (manually) possible to migrate in other infrastructure
		BCR-11.7		Do you test your backup or redundancy mechanisms at least annually?	X			Redundancy mechanisms tested at least annually

Change Control & Configuration Management *New Development / Acquisition*	CCC-01	CCC-01.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to ensure the development and/or acquisition of new data, physical or virtual applications, infrastructure network and systems components, or any corporate, operations and/or data center facilities have been pre-authorized by the organization's business leadership or other accountable business role or function	Are policies and procedures established for management authorization for development or acquisition of new applications, systems, databases, infrastructure, services, operations and facilities?	X			Morolabs procedures established for management or acquisition of new application, systems, databases, infrastructure and services is in alignment with AgID qualification requirements.
Change Control & Configuration Management *Outsourced Development*	CCC-02	CCC-02.1	External business partners shall adhere to the same policies and procedures for change management, release, and testing as internal developers within the organization (e.g., ITIL service management processes).	Are policies and procedures for change management, release, and testing adequately communicated to external business partners?			X	Morolabs does not outsource the development of its code.
		CCC-02.2		Are policies and procedures adequately enforced to ensure external business partners comply with change management requirements?			X	Morolabs does not outsource the development of its source code.
Change Control & Configuration *Management Quality Testing*	CCC-03	CCC-03.1	Organizations shall follow a defined quality change control and testing process (e.g., ITIL Service Management) with established baselines, testing, and release standards which focus on system availability, confidentiality, and integrity of systems and services.	Do you have a defined quality change control and testing process in place based on system availability, confidentiality, and integrity?	X			Morolabs adopts ITIL as a quality change control and testing process
		CCC-03.2		Is documentation describing known issues with certain products/services available?	X			Technical manual and user manual if applicable.
		CCC-03.3		Are there policies and procedures in place to triage and remedy reported bugs and security vulnerabilities for product and service offerings?	X			Morolabs has a vulnerability Risk Assessment Process in place as part of the Continuous Monitoring Plan. This process is used to triage each reported security vulnerability or bug before it is submitted to the respective development team in form of a Change Request (CR). Each CR submitted for Morolabs product must include a change description, implementation plan, assessed level of risk, impact analysis, back out plan, assigned resources and a test plan prior to being improved.
		CCC-03.4		Do you have controls in place to ensure that standards of quality are being met for all software development?	X			All changes are tested and validated in a test environment prior to being pushed to production.
		CCC-03.5		Do you have controls in place to detect source code security defects for any outsourced software development activities?			X	Morolabs does not outsource the development of its code.
		CCC-03.6		Are mechanisms in place to ensure that all debugging and test code elements are removed from released software versions?	X			The code is sanitized before deployment with the elimination of all additional information, remarks included, useful only in the coding phase.

Change Control & Configuration Management *Unauthorized Software Installations*	CCC-04	CCC-04.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to restrict the installation of unauthorized software on organizationally-owned or managed user end-point devices (e.g., issued workstations, laptops, and mobile devices) and IT infrastructure network and systems components.	Do you have controls in place to restrict and monitor the installation of unauthorized software onto your systems?	X			Any software to be added to any Morolabs SaaS system must be authorized through existing change control procedures. Only System Administrator can add software, generally if present in white list.
Change Control & Configuration Management *Production Changes*	CCC-05	CCC-05.1	Policies and procedures shall be established for managing the risks associated with applying changes to: • Business-critical or customer (tenant)-impacting (physical and virtual) applications and system-system interface (API) designs and configurations. • Infrastructure network and systems components. Technical measures shall be implemented to provide assurance that all changes directly correspond to a	Do you provide tenants with documentation that describes your production change management procedures and their roles/rights/responsibilities within it?		X		The detailed change management procedures and documentation are not distributed.
		CCC-05.2		Do you have policies and procedures established for managing risks with respect to change management in production environments?	X			Morolabs adopt a specific policy and procedure for managing risks with respect to change management in production environments. A property methodology, called Enterprise Risk Management, is used to estimate risks
		CCC-05.3		Do you have technical measures in place to ensure that changes in production environments are registered, authorized and in adherence with existing SLAs?	X			Morolabs adopt a specific procedure to ensure that changes in production environments are registered, authorized and in adherence with existing SLAs
Data Security & Information Lifecycle Management *Classification*	DSI-01	DSI-01.1	Data and objects containing data shall be assigned a classification by the data owner based on data type, value, sensitivity, and criticality to the organization.	Do you provide a capability to identify data and virtual machines via policy tags/metadata (e.g., tags can be used to limit guest operating systems from booting/instantiating/transporting data in the wrong country)?			X	Morolabs only uses qualified AgID CSPs with GDPR (intra EU) compliant datacenters
		DSI-01.2		Do you provide a capability to identify data and hardware via policy tags/metadata/hardware tags (e.g., TXT/TPM, VN-Tag, etc.)?			X	Hardware is completely transparent to customer of SaaS offering
Data Security & Information Lifecycle Management *Data Inventory / Flows*	DSI-02	DSI-02.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to inventory, document, and maintain data flows for data that is resident (permanently or temporarily) within the service's geographically distributed (physical and virtual)	Do you inventory, document, and maintain data flows for data that is resident (permanent or temporary) within the services' applications and infrastructure network and systems?	X			
		DSI-02.2		Can you ensure that data does not migrate beyond a defined geographical residency?	X			Morolabs only uses qualified AgID CSPs with GDPR (intra EU) compliant datacenters
Data Security & Information Lifecycle Management *E-commerce*	DSI-03	DSI-03.1	Data related to electronic commerce (e-commerce) that traverses public networks shall be appropriately classified and protected from fraudulent activity, unauthorized	Do you provide standardized (e.g. ISO/IEC) non-proprietary encryption algorithms (3DES, AES, etc.) to tenants in order for them to protect their data if it is required to move through public networks (e.g., the Internet)?	X			Morolabs software provides encryption at REST with AES-256, and encryption in transit with HTTPS via TLS 1.2.

Transactions		DSI-03.2	disclosure, or modification in such a manner to prevent contract dispute and compromise of data.	Do you utilize open encryption methodologies any time your infrastructure components need to communicate with each other via public networks (e.g., Internet-based replication of data from one environment to another)?	X			HTTPS with TLS 1.2 utilized
Data Security & Information Lifecycle Management *Handling / Labeling / Security Policy*	DSI-04	DSI-04.1	Policies and procedures shall be established for labeling, handling, and the security of data and objects which contain data. Mechanisms for label inheritance shall be implemented for objects that act as aggregate containers for data.	Are policies and procedures established for data labeling and handling in order to ensure the security of data and objects that contain data?	X			Customers can setup their own data labeling in Morolabs solutions.
		DSI-04.2		Do you follow a structured data-labeling standard (e.g., ISO 15489, Oasis XML Catalog Specification, CSA data type guidance)?			X	Customers can setup their own data labeling in Morolabs solutions.
		DSI-04.3		Are mechanisms for label inheritance implemented for objects that act as aggregate containers for data?			X	Customers can setup their own data labeling in Morolabs solutions.
Data Security & Information Lifecycle Management *Nonproduction Data*	DSI-05	DSI-05.1	Production data shall not be replicated or used in non-production environments. Any use of customer data in non-production environments requires explicit, documented approval from all customers whose data is affected, and must comply with all legal and regulatory requirements for scrubbing of sensitive data elements.	Do you have procedures in place to ensure production data shall not be replicated or used in non-production environments?	X			Morolabs customers retain ownership of their own data. Morolabs provides customers the ability to maintain and develop production and non-production organization environments on demand. It is the responsibility of the customer to ensure that their production data is not replicated to the non-production environments. Morolabs recommend customers utilize a separate staging organization from the production one for testing purposes. Movement or copying of Customer Data by Morolabs out of the production environment into a non-production environment is prohibited except when specific requested by the customer and his consent is obtained for
Data Security & Information Lifecycle Management *Ownership / Stewardship*	DSI-06	DSI-06.1	All data shall be designated with stewardship, with assigned responsibilities defined, documented, and communicated.	Are the responsibilities regarding data stewardship defined, assigned, documented, and communicated?	X			Data stored within Morolabs SaaS meets AgID requirements. Customers are responsible for implementing workflows to enforce this categorization level. Customers retain full ownership of their data.
Data Security & Information Lifecycle Management *Secure Disposal*	DSI-07	DSI-07.1	Policies and procedures shall be established with supporting business processes and technical measures implemented for the secure disposal and complete removal of data from all storage media, ensuring data is not recoverable by any computer forensic means.	Do you support the secure deletion (e.g., degaussing/cryptographic wiping) of archived and backed-up data?	X			See cloud infrastructure provider security documentation for secure deletion procedures.
		DSI-07.2		Can you provide a published procedure for exiting the service arrangement, including assurance to sanitize all computing resources of tenant data once a customer has exited your environment or has vacated a resource?		X		Sanitization procedures not distributed, but in alignment with standards.
Datacenter Security *Asset Management*	DCS-01	DCS-01.1	Assets must be classified in terms of business criticality, service-level expectations, and operational	Do you classify your assets in terms of business criticality, service-level expectations, and operational continuity requirements?			X	Morolabs only uses qualified AgID CSPs (No Physical Infrastructure)

		DCS-01.2	continuity requirements. A complete inventory of business-critical assets located at all sites and/or geographical locations and their usage over time	Do you maintain a complete inventory of all of your critical assets located at all sites/ or geographical locations and their assigned ownership?	X			Morolabs inventory listing of all critical assets and ownership is maintained based on best practice requirements.
Datacenter Security *Controlled Access Points*	DCS-02	DCS-02.1	Physical security perimeters (e.g., fences, walls, barriers, guards, gates, electronic surveillance, physical authentication mechanisms, reception desks, and security patrols) shall be implemented to safeguard sensitive data and information systems.	Are physical security perimeters (e.g., fences, walls, barriers, guards, gates, electronic surveillance, physical authentication mechanisms, reception desks, and security patrols) implemented for all areas housing sensitive data and information systems?	X			Morolabs's cloud infrastructure providers are AgID qualified and have physical security measures for their data centers that comply with high industry standards for physical security controls. For more information, visit their respective compliance web sites.
Datacenter Security *Equipment Identification*	DCS-03	DCS-03.1	Automated equipment identification shall be used as a method of connection authentication. Location-aware technologies may be used to validate connection authentication integrity based on known equipment location.	Do you have a capability to use system geographic location as an authentication factor?	X			On demand is activated client geographic location as an authentication factor (is not possible to obtain access from outside specific country or specific IP address group).
		DCS-03.2		Is automated equipment identification used as a method to validate connection authentication integrity based on known equipment location?	X			The cloud infrastructure providers managed automated mechanisms to detect discrepancies in device configuration by comparing them against the defined policies.
Datacenter Security *Offsite Authorization*	DCS-04	DCS-04.1	Authorization must be obtained prior to relocation or transfer of hardware, software, or data to an offsite premises.	Is authorization obtained prior to relocation or transfer of hardware, software, or data to an offsite premises?			X	Morolabs only uses qualified AgID CSPs (No Physical Infrastructure). See cloud infrastructure provider security documentation.
Datacenter Security *Offsite Equipment*	DCS-05	DCS-05.1	Policies and procedures shall be established for the secure disposal of equipment (by asset type) used outside the organization's premise. This shall include a wiping solution or destruction process that renders recovery of information impossible. The erasure shall consist of a full write of the drive to ensure that the erased drive is released to inventory for reuse and deployment or securely stored until it can be destroyed.	Can you provide tenants with your asset management policies and procedures?	X			Morolabs only uses qualified AgID CSPs (No Physical Infrastructure). See cloud infrastructure provider security documentation.
Datacenter Security *Policy*	DCS-06	DCS-06.1	Policies and procedures shall be established, and supporting business processes implemented, for maintaining a safe and secure working environment in offices, rooms, facilities, and secure areas storing sensitive information.	Can you provide evidence that policies, standards, and procedures have been established for maintaining a safe and secure working environment in offices, rooms, facilities, and secure areas?	X			Morolabs only uses qualified AgID CSPs (No Physical Infrastructure). Cloud infrastructure provider policies policy define and establish controls for maintaining a safe and secure working environment in offices, rooms, facilities, and secure areas storing sensitive information.
		DCS-06.2		Can you provide evidence that your personnel and involved third parties have been trained regarding your documented policies, standards, and procedures?	X			Morolabs trains its employees annually in its security policies. Third-parties agree to observe security policies as part of their contract.

Datacenter Security *Secure Area Authorization*	DCS-07	DCS-07.1	Ingress and egress to secure areas shall be constrained and monitored by physical access control mechanisms to ensure that only authorized personnel are allowed access.	Are physical access control mechanisms (e.g. CCTV cameras, ID cards, checkpoints) in place to secure, constrain and monitor egress and ingress points?	X			Morolabs only uses qualified AgID CSPs (No Physical Infrastructure). See cloud infrastructure provider security documentation.
Datacenter Security *Unauthorized Persons Entry*	DCS-08	DCS-08.1	Ingress and egress points such as service areas and other points where unauthorized personnel may enter the premises shall be monitored, controlled and, if possible, isolated from data storage and processing facilities to prevent unauthorized data corruption, compromise, and loss.	Are ingress and egress points, such as service areas and other points where unauthorized personnel may enter the premises, monitored, controlled and isolated from data storage and process?	X			Morolabs only uses qualified AgID CSPs (No Physical Infrastructure). See cloud infrastructure provider security documentation.
Datacenter Security *User Access*	DCS-09	DCS-09.1	Physical access to information assets and functions by users and support personnel shall be restricted.	Do you restrict physical access to information assets and functions by users and support personnel?	X			Morolabs only uses qualified AgID CSPs (No Physical Infrastructure). See cloud infrastructure provider security documentation.
Encryption & Key Management *Entitlement*	EKM-01	EKM-01.1	Keys must have identifiable owners (binding keys to identities) and there shall be key management policies.	Do you have key management policies binding keys to identifiable owners?	X			Key management policies, procedures, and processes for Morolabs align with best standard requirements.
Encryption & Key Management *Key Generation*	EKM-02	EKM-02.1	Policies and procedures shall be established for the management of cryptographic keys in the service's cryptosystem (e.g., lifecycle management from key generation to revocation and replacement, public key infrastructure, cryptographic protocol design and algorithms used, access controls in place for secure key generation, and exchange and storage including segregation of keys used for encrypted data or sessions). Upon	Do you have a capability to allow creation of unique encryption keys per tenant?	X			On demand it's allowed creation of unique encryption keys per tenant
		EKM-02.2		Do you have a capability to manage encryption keys on behalf of tenants?	X			Cloud provider management system permit to manage encryption keys of single tenant.
		EKM-02.3		Do you maintain key management procedures?	X			Morolabs operational keys are managed by the technical support team. Critical keys are rotated periodically.
		EKM-02.4		Do you have documented ownership for each stage of the lifecycle of encryption keys?	X			Keys are maintained by the Morolabs technical support team.
		EKM-02.5		Do you utilize any third party/open source/proprietary frameworks to manage encryption keys?	X			Cloud infrastructure provider key management systems utilized.
Encryption & Key Management *Encryption*	EKM-03	EKM-03.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, for the use of encryption protocols for protection of sensitive data in storage (e.g., file servers, databases, and end-user workstations) and data in transmission (e.g., system interfaces, over public networks, and	Do you encrypt tenant data at rest (on disk/storage) within your environment?	X			On demand data is encrypted at rest with AES-256 which is a FIPS 140-2 compliant encryption algorithms.
		EKM-03.2		Do you leverage encryption to protect data and virtual machine images during transport across and between networks and hypervisor instances?	X			Morolabs utilizes encryption in transit and at-rest by default.
		EKM-03.3		Do you have documentation establishing and defining your encryption management policies, procedures, and guidelines?	X			Internal policy and procedure.
Encryption & Key Management *Storage and Access*	EKM-04	EKM-04.1	Platform and data appropriate encryption (e.g., AES-256) in open/validated formats and standard algorithms shall be required. Keys shall not be stored in the cloud (i.e. at the cloud provider in question), but maintained by the cloud consumer or	Do you have platform and data appropriate encryption that uses open/validated formats and standard algorithms?	X			FIPS 140-2 compliant cryptographic algorithms are implemented
		EKM-04.2		Are your encryption keys maintained by the cloud consumer or a trusted key management provider?	X			Morolabs encryption keys are maintained by the Morolabs technical support team but stored in Cloud Service Provider Key Management Service which is FIP 140-2 compliant.

		EKM-04.3	trusted key management provider. Key management and key usage shall be separated duties.	Do you store encryption keys in the cloud?	X			Public keys are stored in production environments. Private keys are stored on a private offline store.
		EKM-04.4		Do you have separate key management and key usage duties?		X		Administrators manage the key management system and consume the keys from it.
Governance and Risk Management *Baseline Requirements*	GRM-01	GRM-01.1	Baseline security requirements shall be established for developed or acquired, organizationally-owned or managed, physical or virtual, applications and infrastructure system, and network components that comply with applicable legal, statutory, and regulatory compliance obligations. Deviations from standard baseline	Do you have documented information security baselines for every component of your infrastructure (e.g., hypervisors, operating systems, routers, DNS servers, etc.)?	X			Morolabs uses third party CSP AgID qualified.
		GRM-01.2		Do you have the capability to continuously monitor and report the compliance of your infrastructure against your information security baselines?	X			Morolabs uses third party CSP AgID qualified.
Governance and Risk Management *Risk Assessments*	GRM-02	GRM-02.1	Risk assessments associated with data governance requirements shall be conducted at planned intervals and shall consider the following: • Awareness of where sensitive data is stored and transmitted across applications, databases, servers, and network infrastructure • Compliance with defined retention	Does your organization's risk assessments take into account awareness of data residency, legal and statutory requirements for retention periods and data protection and classification?	X			Baseline security requirements are constantly being reviewed, improved and implemented as internal policy.
		GRM-02.2		Do you conduct risk assessments associated with data governance requirements at least once a year?	X			Morolabs adopt a specific policy and procedure for managing risks with respect to data governance requirements at least once a year.
Governance and Risk Management *Management Oversight*	GRM-03	GRM-03.1	Managers are responsible for maintaining awareness of, and complying with, security policies, procedures, and standards that are relevant to their area of responsibility.	Are your technical, business, and executive managers responsible for maintaining awareness of and compliance with security policies, procedures, and standards for both themselves and their employees as they pertain to the manager and employees' area of responsibility?	X			Managers of Morolabs employees are responsible for ensuring awareness of applicable security policies and procedures for technical team members.
Governance and Risk Management *Management Program*	GRM-04	GRM-04.1	An Information Security Management Program (ISMP) shall be developed, documented, approved, and implemented that includes administrative, technical, and physical safeguards to protect assets and data	Do you provide tenants with documentation describing your Information Security Management Program (ISMP)?	X			Our system security plan information may be shared under NDA.
		GRM-04.2		Do you review your Information Security Management Program (ISMP) at least once a year?	X			ISMP is reviewed/audited annually by a 3rd party assessor. Cloud infrastructure providers are AgID qualified.
Governance and Risk Management *Management Support / Involvement*	GRM-05	GRM-05.1	Executive and line management shall take formal action to support information security through clearly-documented direction and commitment, and shall ensure the action has been assigned	Do executive and line management take formal action to support information security through clearly-documented direction and commitment, and ensure the action has been assigned?	X			Morolabs's security policies are signed and reviewed by executive management and disseminated to team members in alignment with best practice and voluntary standards. Cloud infrastructure providers documentation is reviewed regularly.
Governance and Risk Management *Policy*	GRM-06	GRM-06.1	Information security policies and procedures shall be established and made readily available for review by all impacted personnel and external business relationships. Information security policies must be authorized by the organization's business leadership	Are your information security policies and procedures made available to all impacted personnel and business partners, authorized by accountable business role/function and supported by the information security management program as per industry best practices (e.g. ISO 27001, SOC 2)?	X			See GRM-05.1 response above.

		GRM-06.2	the organization's business leadership (or other accountable business role or function) and supported by a strategic business plan and an information security management program inclusive of defined information security roles and responsibilities for business leadership.	Are information security policies authorized by the organization's business leadership (or other accountable business role or function) and supported by a strategic business plan and an information security management program inclusive of defined information security roles and responsibilities for business leadership?	X			Information security policies are defined by the organization's business leadership. A strategic business plan defines security roles and responsibilities.
		GRM-06.3		Do you have agreements to ensure your providers adhere to your information security and privacy policies?	X			Compliance art. 28 GDPR.
		GRM-06.4		Can you provide evidence of due diligence mapping of your controls, architecture, and processes to regulations and/or standards?	X			Morolabs mapping of controls, architecture and processes to regulations and/or standards information may be shared under NDA.
		GRM-06.5		Do you disclose which controls, standards, certifications, and/or regulations you comply with?	X			The ISO 9001: 2015 certification provides for the obligation of publication. Compliance with the principles of the GDPR is indicated in the documentation. Many of the organizational measures are inspired by the requirements of the ISO / IEC 27001 certification.
Governance and Risk Management *Policy Enforcement*	GRM-07	GRM-07.1	A formal disciplinary or sanction policy shall be established for employees who have violated security policies and procedures. Employees shall be made aware of what action might be taken in the event of a violation, and disciplinary measures must be stated in the policies and procedures.	Is a formal disciplinary or sanction policy established for employees who have violated security policies and procedures?	X			This is documented in the Morolabs employee handbook which is distributed and signed off upon completion of the new hire training.
		GRM-07.2		Are employees made aware of what actions could be taken in the event of a violation via their policies and procedures?	X			Prior to accessing to Morolabs backend systems, all employees are trained and must acknowledge and sign a document that outlines technical and organizational responsibilities related to the access and use of Morolabs SaaS. Key rules and securities procedure and policies are also highlighted in the document. Periodically the document is reviewed/updated/re-signed.
Governance and Risk Management *Business / Policy Change Impacts*	GRM-08	GRM-08.1	Risk assessment results shall include updates to security policies, procedures, standards, and controls to ensure that they remain relevant and effective.	Do risk assessment results include updates to security policies, procedures, standards, and controls to ensure they remain relevant and effective?	X			Decisions to update policies and procedures are based on the risk assessment reports. Risk Assessments are regularly reviewed based on periodicity and changes emerging to the risk landscape.
Governance and Risk Management *Policy Reviews*	GRM-09	GRM-09.1	The organization's business leadership (or other accountable business role or function) shall review the information security policy at planned intervals or as	Do you notify your tenants when you make material changes to your information security and/or privacy policies?	X			Significant privacy and security announcements are directly sent to tenant or make within the web site announcements.

		GRM-09.2	a result of changes to the organization to ensure its continuing alignment with the security strategy, effectiveness, accuracy, relevance, and applicability to legal, statutory, or regulatory compliance obligations.	Do you perform, at minimum, annual reviews to your privacy and security policies?	X			As part of the continuous monitoring process, a full security control review and risk assessment is conducted annually which includes associated policies, procedures, and standards as they relate to Morolabs SaaS. Morolabs GDPR specialists provide continuously adherence to principle and compliance to data protection law.
Governance and Risk Management *Assessments*	GRM-10	GRM-10.1	Aligned with the enterprise-wide framework, formal risk assessments shall be performed at least annually or at planned intervals, (and in conjunction with any changes to information systems) to determine the likelihood and impact of all identified risks using qualitative and quantitative methods. The likelihood and impact associated with inherent and residual	Are formal risk assessments aligned with the enterprise-wide framework and performed at least annually, or at planned intervals, determining the likelihood and impact of all identified risks, using qualitative and quantitative methods?	X			Risk Assessments are performed at least annually and a continuous monitoring plan is in place.
		GRM-10.2		Is the likelihood and impact associated with inherent and residual risk determined independently, considering all risk categories?	X			The risk analysis model adopted allows an objective assessment since the probability and impact are calculated independently for all ENISA risk categories.
Governance and Risk Management *Program*	GRM-11	GRM-11.1	Risks shall be mitigated to an acceptable level. Acceptance levels based on risk criteria shall be established and documented in accordance with reasonable resolution time frames and stakeholder approval	Do you have a documented, organization-wide program in place to manage risk?	X			Both for the risks related to technologies as well as for the risks related to personal data protection.
		GRM-11.2		Do you make available documentation of your organization-wide risk management program?	X			Every personnel who is read into the Morolabs SaaS program has access to risk management plan document.
Human Resources *Asset Returns*	HRS-01	HRS-01.1	Upon termination of workforce personnel and/or expiration of external business relationships, all organizationally-owned assets shall be returned within an established period.	Upon termination of contract or business relationship, are employees and business partners adequately informed of their obligations for returning organizationally-owned assets?	X			Morolabs Human Resources Policy drives employee termination of contract or business relationship and managed returning organizationally owned assets.
		HRS-01.2		Do you have asset return procedures outlining how assets should be returned within an established period?	X			The procedure provides that the assets must be returned on the same day as the closing of the contract.
Human Resources *Background Screening*	HRS-02	HRS-02.1	Pursuant to local laws, regulations, ethics, and contractual constraints, all employment candidates, contractors, and third parties shall be subject to background verification proportional to the data classification to be accessed, the business requirements, and acceptable risk	Pursuant to local laws, regulations, ethics, and contractual constraints, are all employment candidates, contractors, and involved third parties subject to background verification?	X			All Morolabs SaaS and cloud infrastructure provider employees are required to complete a standard background check as part of the hiring process. Background checks may include but are not limited to review of information relating to a candidate's education, and employment.
Human Resources *Employment Agreements*	HRS-03	HRS-03.1	Employment agreements shall incorporate provisions and/or terms for adherence to established information governance and security policies and must be signed by newly hired or on-boarded workforce personnel (e.g., full	Do your employment agreements incorporate provisions and/or terms in adherence to established information governance and security policies?	X			The employment agreements incorporate for specific provisions on confidentiality and compliance with the security measures adopted.

		HRS-03.2	or part-time employee or contingent staff) prior to granting workforce personnel user access to corporate facilities, resources, and assets.	Do you require that employment agreements are signed by newly hired or on-boarded workforce personnel prior to granting workforce personnel user access to corporate facilities, resources, and assets?	X			As required by current Italian legislation.
Human Resources *Employment Termination*	HRS-04	HRS-04.1	Roles and responsibilities for performing employment termination or change in employment procedures shall be assigned, documented, and communicated.	Are documented policies, procedures, and guidelines in place to govern change in employment and/or termination?	X			Morolabs Human Resources Policy drives employee termination processes for SaaS or other services. These policies are available to all employees.
		HRS-04.2		Do the above procedures and guidelines account for timely revocation of access and return of assets?	X			See HRS-01.1 response above
Human Resources *Portable / Mobile Devices*	HRS-05	HRS-05.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to manage business risks associated with permitting mobile device access to corporate resources and may require the implementation of higher assurance compensating controls and acceptable-use policies and procedures (e.g., mandated security training, stronger identity, entitlement and access controls, and device monitoring).	Are policies and procedures established and measures implemented to strictly limit access to your sensitive data and tenant data from portable and mobile devices (e.g., laptops, cell phones, and personal digital assistants (PDAs)), which are generally higher-risk than non-portable devices (e.g., desktop computers at the provider organization's facilities)?	X			Morolabs has a defined and established mobile device policy. Morolabs Cloud infrastructure provider personnel are required to adhere to applicable policies, which do not permit mobile computing devices to the production environment, unless those devices have been approved for use by cloud infrastructure management.
Human Resources *Non-Disclosure Agreements*	HRS-06	HRS-06.1	Requirements for non-disclosure or confidentiality agreements reflecting the organization's needs for the protection of data and operational details shall be identified, documented, and reviewed at planned intervals.	Are requirements for non-disclosure or confidentiality agreements reflecting the organization's needs for the protection of data and operational details identified, documented, and reviewed at planned intervals?	X			Morolabs legal counsel manages and periodically revises the Morolabs NDA to reflect SaaS business needs.
Human Resources *Roles / Responsibilities*	HRS-07	HRS-07.1	Roles and responsibilities of contractors, employees, and third-party users shall be documented as they relate to information assets and security.	Do you provide tenants with a role definition document clarifying your administrative responsibilities versus those of the tenant?	X			Morolabs has a Customer RACI Matrix which explains and outlines in detail the responsibilities for both the tenants and the service provider to maintain alignment with best practice and voluntary standards.
Human Resources *Acceptable Use*	HRS-08	HRS-08.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, for defining allowances and conditions for permitting usage of organizationally-owned or managed user end-point devices (e.g., issued workstations, laptops, and mobile devices) and IT infrastructure network and systems components. Additionally, defining allowances and conditions to	Do you have policies and procedures in place to define allowances and conditions for permitting usage of organizationally-owned or managed user end-point devices and IT infrastructure network and systems components?	X			See HRS-05.1 response above
		HRS-08.2		Do you define allowance and conditions for BYOD devices and its applications to access corporate resources?	X			The policy of access to corporate resources via BYOD only provides for the possibility of consulting corporate e-mails; other corporate resources are not accessible through BYOD.

Human Resources *Training / Awareness*	HRS-09	HRS-09.1	A security awareness training program shall be established for all contractors, third-party users, and employees of the organization and mandated when appropriate. All individuals with access to organizational data shall receive appropriate awareness training and regular updates in organizational procedures, processes, and policies relating to their professional function relative to the organization.	Do you provide a formal, role-based, security awareness training program for cloud-related access and data management issues (e.g., multi-tenancy, nationality, cloud delivery model, segregation of duties implications, and conflicts of interest) for all persons with access to tenant data?	X			Periodically (at least annual) role based and security awareness training is provided for Morolabs employees.
		HRS-09.2		Do you specifically train your employees regarding their specific role and the information security controls they must fulfill?	X			See HRS-09.1 response above
		HRS-09.3		Do you document employee acknowledgment of training they have completed?	X			Training is tracked using quality system under ISO 9001:2015
		HRS-09.4		Is successful and timed completion of the training program(s) considered a prerequisite for acquiring and maintaining access to sensitive systems?	X			Before granting access to systems or resources for Morolabs SaaS, employees have to complete certain training modules as a pre-requisite.
		HRS-09.5		Are personnel trained and provided with awareness programs at least once a year?	X			See HRS-09.1 response above
		HRS-09.6		Are administrators and data stewards properly educated on their legal responsibilities with regard to security and data integrity?	X			Employees are formed on GDPR compliance requirements, security voluntary standard and best practice. Someone is Lead Auditor qualified on ISO standards
Human Resources *User Responsibility*	HRS-10	HRS-10.1	All personnel shall be made aware of their roles and responsibilities for: • Maintaining awareness and compliance with established policies and procedures and applicable legal, statutory, or regulatory compliance obligations. • Maintaining a safe and secure working environment	Are personnel informed of their responsibilities for maintaining awareness and compliance with published security policies, procedures, standards, and applicable regulatory requirements?	X			Morolabs SaaS employees adhere to a rules of behavior policy outlining user responsibilities. This includes guidance on safeguarding resources used to administer Morolabs systems and applications.
		HRS-10.2		Are personnel informed of their responsibilities for maintaining a safe and secure working environment?	X			See HRS-10.1 response above
		HRS-10.3		Are personnel informed of their responsibilities for ensuring that equipment is secured and not left unattended?	X			See HRS-10.1 response above
Human Resources *Workspace*	HRS-11	HRS-11.1	Policies and procedures shall be established to require that unattended workspaces do not have openly visible (e.g., on a desktop) sensitive documents and user computing sessions had been disabled after an established period of inactivity	Are all computers and laptops configured such that there is lockout screen after a pre-defined amount of time?	X			Morolabs standard security policy
		HRS-11.2		Are there policies and procedures to ensure that unattended workspaces do not have openly visible (e.g., on a desktop) sensitive documents?	X			Morolabs standard security policy
Identity & Access Management *Audit Tools Access*	IAM-01	IAM-01.1	Access to, and use of, audit tools that interact with the organization's information systems shall be appropriately segmented and restricted to prevent compromise and misuse of	Do you restrict, log, and monitor access to your information security management systems (e.g., hypervisors, firewalls, vulnerability scanners, network sniffers, APIs, etc.)?	X			All access to the infrastructure and application is monitored, tracked, and recorded through native security services offered by the Cloud Service provider (log).

		IAM-01.2	log data.	Do you monitor and log privileged access (e.g., administrator level) to information security management systems?	X			Complies with the provisions of the provision of the Italian “Autorità Garante per la protezione dati personali” (GDPR supervisory authority for the protection of personal data) in terms of system administrator
Identity & Access Management *User Access Policy*	IAM-02	IAM-02.1	User access policies and procedures shall be established, and supporting business processes and technical measures implemented, for ensuring appropriate identity, entitlement, and access management for all internal corporate and customer (tenant) users with access to data and organizationally-owned or managed (physical and virtual) application interfaces and infrastructure network and systems components. These policies, procedures, processes, and measures must incorporate the following: • Procedures, supporting roles, and responsibilities for provisioning and de-provisioning user account entitlements following the rule of least privilege based on job function (e.g., internal employee and contingent staff personnel changes, customer-controlled access, suppliers' business relationships, or other third-party business relationships) • Business case considerations for higher levels of assurance and multi-factor authentication secrets (e.g., management interfaces, key generation, remote access, segregation of duties, emergency access, large-	Do you have controls in place ensuring timely removal of systems access that is no longer required for business purposes?	X			When an Morolabs employee is transferred to another department or team where s/he does not need to have access to SaaS anymore, access is revoked as soon as is notified and the security team engaged to update status.
		IAM-02.2		Do you have policies, procedures and technical measures in place to ensure appropriate data/assets access management in adherence to legal, statutory or regulatory compliance requirements?	X			The "need to do" and "need to know" policies are active with a view to "separation of duty"
		IAM-02.3		Do you have procedures and technical measures in place for user account entitlement de-/provisioning based on the rule of least privilege?	X			See IAM-02.2 response above
		IAM-02.4		Do you have procedures and technical measures in place for data access segmentation in multi-tenant system architectures?	X			See IAM-02.2 response above
		IAM-02.5		Do you enforce data access permissions based on the rules of Authentication, Authorization and Accountability (AAA)?	X			Morolabs SaaS applications manage access, authorizations and registrations according to the AAA protocol.
		IAM-02.6		Do your policies and procedures incorporate security controls for establishing higher levels of assurance for critical business case considerations, supported by multifactor authentication?		X		2FA is planned for deployment in the future. IP address filtering is available.
		IAM-02.7		Do you provide metrics to track the speed with which you are able to remove systems access that is no longer required for business purposes?	X			Users permissions changes are tracked with date and time.
Identity & Access Management *Diagnostic / Configuration Ports Access*	IAM-03	IAM-03.1	User access to diagnostic and configuration ports shall be restricted to authorized individuals and applications.	Is user access to diagnostic and configuration ports restricted to authorized individuals and applications?	X			Access is granted only on specific IP addresses referable to Morolabs.
Identity & Access Management *Policies and Procedures*	IAM-04	IAM-04.1	Policies and procedures shall be established to store and manage identity information about every person who accesses IT infrastructure and to determine their level of access. Policies shall also be developed to control access to network resources	Do you manage and store the identity of all personnel who have access to the IT infrastructure, including their level of access?	X			Morolabs technical operations team maintains records of access control grants to all personnel. Periodic access control audits are conducted.
		IAM-04.2		Do you manage and store the user identity of all personnel who have network access, including their level of access?	X			See response in IAM-04.1 above

Identity & Access Management *Segregation of Duties*	IAM-05	IAM-05.1	User access policies and procedures shall be established, and supporting business processes and technical measures implemented, for restricting user access as per defined segregation of duties to address business risks associated with a user-role conflict of interest.	Do you provide tenants with documentation on how you maintain segregation of duties within your cloud service offering?	X			Morolabs customers and users do not have administrative access to the backend infrastructure. Usually, Morolabs customers have limited administration capabilities within the application. Customers are responsible for managing their user access and profile to the application by leveraging internal user account, Active Directory (LDAP) and SAML 2.0 compliant Identity Provider (IdP). All source code access is restricted to the Morolabs development team.
Identity & Access Management *Source Code Access Restriction*	IAM-06	IAM-06.1	Access to the organization's own developed applications, program, or object source code, or any other form of intellectual property (IP), and use of proprietary software shall be appropriately restricted following the rule of least privilege based on job function as per established user access policies and procedures.	Are controls in place to prevent unauthorized access to your application, program, or object source code, and assure it is restricted to authorized personnel only?	X			Morolabs source code repository is limited to authorized personnel. Source code repository enforce control over changes to source code by requiring a review from designated reviewers prior to submission. An audit log detailing modifications to the source code is maintained.
		IAM-06.2		Are controls in place to prevent unauthorized access to tenant application, program, or object source code, and assure it is restricted to authorized personnel only?	X			Access is based on need-to-know policy. All users in solution need to have a role for which they are granted access to.
Identity & Access Management *Third Party Access*	IAM-07	IAM-07.1	The identification, assessment, and prioritization of risks posed by business processes requiring third-party access to the organization's information systems and data shall be followed by coordinated application of resources to	Does your organization conduct third-party unauthorized access risk assessments?	X			Periodically unauthorized access risk assessments is conducted internally
		IAM-07.2		Are preventive, detective corrective compensating controls in place to mitigate impacts of unauthorized or inappropraite access?	X			Periodic access controls are active. Most installations have banning mechanisms in place against specific policies.
Identity & Access Management *User Access Restriction / Authorization*	IAM-08	IAM-08.1	Policies and procedures are established for permissible storage and access of identities used for authentication to ensure identities are only accessible based on rules of least privilege and replication limitation only to users explicitly defined as business necessary.	Do you document how you grant, approve and enforce access restrictions to tenant/customer credentials following the rules of least privilege?	X			Less than 10 Morolabs Administrators are responsible for managing instances. However, customers have the responsibility of managing access and privilege levels to their application organization. The use of Enterprise Logins (using SAML 2.0) to identity federation and the use of custom roles in Morolabs SaaS to granularly define privileges are recommended best practices.
		IAM-08.2		Based on the rules of least privilege, do you have policies and procedures established for permissible storage and access of identities used for authentication?	X			Rules application is in strict mode
		IAM-08.3		Do you limit identities' replication only to users explicitly defined as business necessary?	X			Only on customer specific request

Identity & Access Management *User Access Authorization*	IAM-09	IAM-09.1	Provisioning user access (e.g., employees, contractors, customers (tenants), business partners and/or supplier relationships) to data and organizationally-owned or managed (physical and virtual) applications, infrastructure systems, and network components shall be authorized by the organization's management prior to access being granted and appropriately restricted as per established policies and procedures. Upon request, provider shall inform customer (tenant) of this user access, especially if	Does your management provision the authorization and restrictions for user access (e.g., employees, contractors, customers (tenants), business partners, and/or suppliers) prior to their access to data and any owned or managed (physical and virtual) applications, infrastructure systems, and network components?	X			Customers have the responsibility to grant access to their Morolabs SaaS applications. All Morolabs administration personnel must complete the training process before they are granted access to any online resources. No access to customer data is granted, excluding technical support activities.
		IAM-09.2		Do you provide upon the request of users with legitimate interest access (e.g., employees, contractors, customers (tenants), business partners and/or suppliers) to data and any owned or managed (physical and virtual) applications, infrastructure systems and network components?			X	Granting access to customer data is a customer responsibility. Customers can choose to provide other organizations access to their datasets/services. If support asked to provide access, customer is referred to their administrator.
Identity & Access Management *User Access Reviews*	IAM-10	IAM-10.1	User access shall be authorized and revalidated for entitlement appropriateness, at planned intervals, by the organization's business leadership or other accountable business role or function supported by evidence to demonstrate the organization is adhering to the rule of least privilege based on job function. For identified access violations, remediation must follow established user access policies and procedures.	Do you require a periodical authorization and validation (e.g. at least annually) of the entitlements for all system users and administrators (exclusive of users maintained by your tenants), based on the rule of least privilege, by business leadership or other accountable business role or function?	X			Authorizations are evaluated periodically and revoked accordingly.
		IAM-10.2		Do you collect evidence to demonstrate that the policy (see question IAM-10.1) has been enforced?	X			All access grants, re-certifications or modifications are tracked, recorded, and archived by the system and application level.
		IAM-10.3		Do you ensure that remediation actions for access violations follow user access policies?	X			Remediation actions for access violations follows user access policies
		IAM-10.4		Will you share user entitlement and remediation reports with your tenants, if inappropriate access may have been allowed to tenant data?	X			Morolabs is in alignment with GDPR and the requirement for notification of data breach is 72 hours. Morolabs will immediately notify customers about inappropriate access to their data after a confirmation has been made that their data was inappropriately accessed.
Identity & Access Management *User Access Revocation*	IAM-11	IAM-11.1	Timely de-provisioning (revocation or modification) of user access to data and organizationally-owned or managed (physical and virtual) applications, infrastructure systems, and network components, shall be implemented as per established policies and procedures and based on user's change in status (e.g., termination of employment or other business relationship, job change, or transfer). Upon request, provider shall	Is timely deprovisioning, revocation, or modification of user access to the organizations systems, information assets, and data implemented upon any change in status of employees, contractors, customers, business partners, or involved third parties?	X			Customers are responsible for managing access to the applications and services customers host on Morolabs SaaS. The use of Enterprise Logins (using SAML 2.0 / SPID) minimizes the requirements for built-in user accounts and would ensure that removal of a customer user from their Active Directory (or LDAP) would ensure access to Morolabs SaaS was also no longer possible. Morolabs system administrator access is removed within 1 day of change of status.

		IAM-11.2	Inform customer (tenant) of these changes, especially if customer (tenant) data is used as part the service and/or customer (tenant) has some shared responsibility over implementation of	Is any change in user access status intended to include termination of employment, contract or agreement, change of employment or transfer within the organization?	X			Morolabs SaaS access provisioning includes account creations, permission granting, modifications, updates, and revocations.
Identity & Access Management *User ID Credentials*	IAM-12	IAM-12.1	Internal corporate or customer (tenant) user account credentials shall be restricted as per the following, ensuring appropriate identity, entitlement, and access management and in accordance with established policies and procedures: • Identity trust verification and service-to-service application (API) and information processing interoperability (e.g., SSO and Federation) • Account credential lifecycle management from instantiation through revocation • Account credential and/or identity store minimization or re-use when feasible • Adherence to industry acceptable and/or regulatory compliant authentication, authorization, and accounting (AAA) rules (e.g., strong/multi-factor, expireable, non-shared authentication secrets)	Do you support use of, or integration with, existing customer-based Single Sign On (SSO) solutions to your service?	X			SPID, Active Directory, LDAP, SAML2, Cohesion
		IAM-12.2		Do you use open standards to delegate authentication capabilities to your tenants?	X			See response in IAM-12.1 above
		IAM-12.3		Do you support identity federation standards (e.g., SAML, SPML, WS-Federation, etc.) as a means of authenticating/authorizing users?	X			Morolabs SaaS supports SAML 2.0 compliant identity providers
		IAM-12.4		Do you have a Policy Enforcement Point capability (e.g., XACML) to enforce regional legal and policy constraints on user access?		X		IP localization filtering is activable on demand
		IAM-12.5		Do you have an identity management system (enabling classification of data for a tenant) in place to enable both role-based and context-based entitlement to data?		X		Data classification is the responsibility of the customer. Morolabs applications manage the user's profile and relative permissions with granularity
		IAM-12.6		Do you provide tenants with strong (multifactor) authentication options (e.g., digital certs, tokens, biometrics, etc.) for user access?		X		2FA is planned for deployment in the future.
		IAM-12.7		Do you allow tenants to use third-party identity assurance services?	X			
		IAM-12.8		Do you support password (e.g., minimum length, age, history, complexity) and account lockout (e.g., lockout threshold, lockout duration) policy enforcement?	X			It is supported password policy enforcement according OWASP best practice and “Misure Minime” AgID (minimum length, age, history, complexity, account lockout threshold, lockout duration)
		IAM-12.9		Do you allow tenants/customers to define password and account lockout policies for their accounts?	X			
		IAM-12.10		Do you support the ability to force password changes upon first logon?	X			
		IAM-12.11		Do you have mechanisms in place for unlocking accounts that have been locked out (e.g., self-service via email, defined challenge questions, manual unlock)?	X			Online accounts automatically unlock after a set period of time.
Identity & Access Management *Utility Programs Access*	IAM-13	IAM-13.1	Utility programs capable of potentially overriding system, object, network, virtual machine, and application controls shall be restricted.	Are access to utility programs used to manage virtualized partitions (e.g. shutdown, clone, etc) appropriately restricted and monitored?	X			Less than 10 Morolabs Administrators are responsible for managing instances or images
Infrastructure & Virtualization Security *Audit Logging / Intrusion Detection*	IVS-01	IVS-01.1	Higher levels of assurance are required for protection, retention, and lifecycle management of audit logs, adhering to applicable legal, statutory, or regulatory compliance obligations and providing	Are file integrity (host) and network intrusion detection (IDS) tools implemented to help facilitate timely detection, investigation by root cause analysis, and response to incidents?	X			Morolabs uses third party CSP. Single instance are protected with detection and reaction mechanisms

		IVS-01.2	unique user access accountability to detect potentially suspicious network behaviors and/or file integrity anomalies, and to support forensic investigative capabilities in the event of a security breach.	Is physical and logical user access to audit logs restricted to authorized personnel?	X			Only accessible by the Morolabs infrastructure administrators (Less than 5 people)
		IVS-01.3		Can you provide evidence that due diligence mapping of regulations and standards to your controls/architecture/processes has been performed?	X			This information is documented in the Morolabs System Security Plan and this can be obtained with an NDA in place.
		IVS-01.4		Are audit logs centrally stored and retained?	X			Audit logs are retained as defined by Morolabs SaaS retention policy.
		IVS-01.5		Are audit logs reviewed on a regular basis for security events (e.g., with automated tools)?	X			Audit logs are reviewed weekly within the Morolabs SaaS solution by the Security and technical team.
Infrastructure & Virtualization Security *Change Detection*	IVS-02	IVS-02.1	The provider shall ensure the integrity of all virtual machine images at all times. Any changes made to virtual machine images must be logged and an alert raised regardless of their running state (e.g., dormant, off, or running). The results of a change or move of an image and the subsequent validation of the image's integrity must be immediately available to customers through electronic methods (e.g., portals or alerts).	Do you log and alert any changes made to virtual machine images regardless of their running state (e.g., dormant, off or running)?	X			Le operazioni SaaS di Morolabs hanno la registrazione completa di tutte le azioni e attività nella soluzione. Se VM non è in esecuzione, viene inviato un avviso al team di sicurezza.
		IVS-02.2		Does the virtual machine management infrastructure include a tamper audit or software integrity function to detect changes to the build/configuration of the virtual machine?	X			Any changes available or made to virtual machine is announced and logged
		IVS-02.3		Are changes made to virtual machines, or moving of an image and subsequent validation of the image's integrity, made immediately available to customers through electronic methods (e.g., portals or alerts)?	X			All changes to the Morolabs infrastructure are tracked and recorded through a specific documented processes and procedure, scheduled maintenance windows are communicated directly to customers. Details about virtual machines is not posted as Morolabs is a multitenant SaaS offering.
Infrastructure & Virtualization Security *Clock Synchronization*	IVS-03	IVS-03.1	A reliable and mutually agreed upon external time source shall be used to synchronize the system clocks of all relevant information processing systems to facilitate tracing and reconstitution of activity timelines.	Do you use a synchronized time-service protocol (e.g., NTP) to ensure all systems have a common time reference?	X			To both increase the security and to provide accurate reporting detail in event logging and monitoring processes and records, all services use consistent clock setting standards synchronized through the Network Time Protocol which hosts a central time source for standardization and reference, in order to maintain accurate time throughout the Morolabs SaaS systems.
Infrastructure & Virtualization Security *Capacity / Resource Planning*	IVS-04	IVS-04.1	The availability, quality, and adequate capacity and resources shall be planned, prepared, and measured to deliver the required system performance in accordance with legal, statutory, and regulatory compliance obligations. Projections of future capacity requirements shall be made to mitigate the risk of system overload.	Do you provide documentation regarding what levels of system (e.g., network, storage, memory, I/O, etc.) oversubscription you maintain and under what circumstances/scenarios?	X			Morolabs SaaS utilizes the capacity of cloud infrastructure providers AgID qualified to meet customer demands and Service Level Agreements (SLA) for availability, quality and capacity. Each cloud provider offers SLAs for their infrastructure.
		IVS-04.2		Do you restrict use of the memory oversubscription capabilities present in the hypervisor?			X	CSP provide limited memory to a single instance. Settings and tuning are supported by technical team.

		IVS-04.3		Does your system's capacity requirements take into account current, projected, and anticipated capacity needs for all systems used to provide services to the tenants?	X			Morolabs SaaS offering relies on Cloud Infrastructure technology which give it the ability to scale as needed to cater to the customers' needs at any given time.
		IVS-04.4		Is system performance monitored and tuned in order to continuously meet regulatory, contractual, and business requirements for all the systems used to provide services to the tenants?	X			Performance are monitored and settings are tuned by the technical support team in order to continuously meet regulatory, contractual, and business requirements.
Infrastructure & Virtualization Security *Management - Vulnerability Management*	IVS-05	IVS-05.1	Implementers shall ensure that the security vulnerability assessment tools or services accommodate the virtualization technologies used (e.g., virtualization aware).	Do security vulnerability assessment tools or services accommodate the virtualization technologies being used (e.g., virtualization aware)?	X			Cloud infrastructure providers are AgID qualified; virtualization technologies are regularly evaluated internally.
Infrastructure & Virtualization Security *Network Security*	IVS-06	IVS-06.1	Network environments and virtual instances shall be designed and configured to restrict and monitor traffic between trusted and untrusted connections. These configurations shall be reviewed at least annually, and supported by a documented justification for use for all allowed services, protocols, ports, and compensating controls.	For your IaaS offering, do you provide customers with guidance on how to create a layered security architecture equivalence using your virtualized solution?			X	Morolabs offers only SaaS to the customers.
		IVS-06.2		Do you regularly update network architecture diagrams that include data flows between security domains/zones?	X			Morolabs SaaS architectural diagrams (Networks and systems combined) are reviewed periodically.
		IVS-06.3		Do you regularly review for appropriateness the allowed access/connectivity (e.g., firewall rules) between security domains/zones within the network?	X			The access policy is limited to a small set of rules according to the "all denied except authorized" principle. It is reviewed periodically
		IVS-06.4		Are all firewall access control lists documented with business justification?	X			See IVS-06.3 response above
Infrastructure & Virtualization Security *OS Hardening and Base Controls*	IVS-07	IVS-07.1	Each operating system shall be hardened to provide only necessary ports, protocols, and services to meet business needs and have in place supporting technical controls such as: antivirus, file integrity monitoring, and logging as part of their baseline operating build standard or template.	Are operating systems hardened to provide only the necessary ports, protocols, and services to meet business needs using technical controls (e.g., antivirus, file integrity monitoring, and logging) as part of their baseline build standard or template?	X			Morolabs technical team has developed a system configuration baseline in alignment with industry best practices. Robust network hardening is present within Morolabs SaaS. Anti-virus, logging capabilities are ensured and monitored on all systems within Morolabs SaaS.
Infrastructure & Virtualization Security *Production / Non-Production Environments*	IVS-08	IVS-08.1	Production and non-production environments shall be separated to prevent unauthorized access or changes to information assets. Separation of the environments may include: stateful inspection firewalls, domain/realm authentication sources, and clear segregation of duties for personnel accessing these environments as part of their job duties.	For your SaaS or PaaS offering, do you provide tenants with separate environments for production and test processes?	X			Morolabs SaaS utilizes separate production and non-production environments. Customers can purchase a separate non-production organization for testing/staging purposes.
		IVS-08.2		For your IaaS offering, do you provide tenants with guidance on how to create suitable production and test environments?			X	Morolabs offers only SaaS to the customers.
		IVS-08.3		Do you logically and physically segregate production and non-production environments?	X			Morolabs SaaS utilizes logically separate production and non-production environments (sometimes environments are physically separate).

Infrastructure & Virtualization Security *Segmentation*	IVS-09	IVS-09.1	Multi-tenant organizationally-owned or managed (physical and virtual) applications, and infrastructure system and network components, shall be designed, developed, deployed, and configured such that provider and customer (tenant) user access is appropriately segmented from other tenant users, based on the following considerations: • Established policies and procedures • Isolation of business critical assets and/or sensitive user data and sessions that mandate stronger internal controls and high levels of assurance • Compliance with legal, statutory, and regulatory compliance obligations	Are system and network environments protected by a firewall or virtual firewall to ensure business and customer security requirements?	X			Cloud infrastructure is proteced by firewalls for single installation.
		IVS-09.2		Are system and network environments protected by a firewall or virtual firewall to ensure compliance with legal, regulatory and contractual requirements?	X			See response in IVS-09.1 above
		IVS-09.3		Have you implemented the necessary measures for the appropriate isolation and segmentation of tenants' access to infrastructure system and network components, in adherence to established policies, legal, statutory, and regulatory compliance obligations?			X	Tenants have not access to the infrastructure.
		IVS-09.4		Do you have the ability to logically segment or encrypt customer data such that data may be produced for a single tenant only, without inadvertently accessing another tenant's data?	X			Every single tenant has a separate instance in database. Data are logically separated and not directly accessed by anyone.
		IVS-09.5		Are system and network environments protected by a firewall or virtual firewall to ensure protection and isolation of sensitive data?	X			See response in IVS-09.1 above
Infrastructure & Virtualization Security *VM Security - Data Protection*	IVS-10	IVS-10.1	Secured and encrypted communication channels shall be used when migrating physical servers, applications, or data to virtualized servers and, where possible, shall use a network segregated from production-level networks for such migrations.	Are secured and encrypted communication channels used when migrating physical servers, applications, or data to virtual servers?	X			Morolabs policy provides exclusively for secure communications via HTTPS via TLS 1.2.
		IVS-10.2		Do you use a network segregated from production-level networks when migrating physical servers, applications, or data to virtual servers?	X			See response in IVS-10.1 above
Infrastructure & Virtualization Security *VMM Security - Hypervisor Hardening*	IVS-11	IVS-11.1	Access to all hypervisor management functions or administrative consoles for systems hosting virtualized systems shall be restricted to personnel based upon the principle of least privilege and supported through technical controls (e.g., two-factor authentication, audit trails, IP address filtering, firewalls, and TLS encapsulated communications to the administrative consoles).	Do you restrict personnel access to all hypervisor management functions or administrative consoles for systems hosting virtualized systems based on the principle of least privilege and supported through technical controls (e.g., two-factor authentication, audit trails, IP address filtering, firewalls and TLS-encapsulated communications to the administrative consoles)?	X			This is managed by the cloud infrastructure service providers, according the security documentation.
Infrastructure & Virtualization Security *Wireless Security*	IVS-12	IVS-12.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to protect wireless network environments, including the	Are policies and procedures established and mechanisms configured and implemented to protect the wireless network environment perimeter and to restrict unauthorized wireless traffic?	X			

		IVS-12.2	following: • Perimeter firewalls implemented and configured to restrict unauthorized traffic • Security settings enabled with strong encryption for authentication and transmission, replacing vendor default settings (e.g., encryption keys, passwords, and SNMP community strings) • User access to wireless network devices restricted to authorized	Are policies and procedures established and mechanisms implemented to ensure wireless security settings are enabled with strong encryption for authentication and transmission, replacing vendor default settings (e.g., encryption keys, passwords, SNMP community strings)?	X			Protection of wireless devices and ensuring encryption are part of regular network management security practices within Morolabs. Access security from a wireless network on a customer premise to the Morolabs SaaS environment is in charge of customers.
		IVS-12.3		Are policies and procedures established and mechanisms implemented to protect wireless network environments and detect the presence of unauthorized (rogue) network devices for a timely disconnect from the network?	X			See response in IVS-12.2 above
Infrastructure & Virtualization Security *Network Architecture*	IVS-13	IVS-13.1	Network architecture diagrams shall clearly identify high-risk environments and data flows that may have legal compliance impacts. Technical measures shall be implemented and shall apply defense-in-depth techniques (e.g., deep packet analysis, traffic throttling, and black-holing) for detection and timely response to network-based attacks associated with anomalous ingress or egress traffic patterns (e.g., MAC spoofing and ARP poisoning attacks) and/or distributed	Do your network architecture diagrams clearly identify high-risk environments and data flows that may have legal compliance impacts?	X			There are generally several layers but the architecture is simple as it provides a management backend and a front end protected by security systems.
		IVS-13.2		Do you implement technical measures and apply defense-in-depth techniques (e.g., deep packet analysis, traffic throttling and black-holing) for detection and timely response to network-based attacks associated with anomalous ingress or egress traffic patterns (e.g., MAC spoofing and ARP poisoning attacks) and/or distributed denial-of-service (DDoS) attacks?	X			The cloud service provider's capabilities provide protection from attacks such as common DDoS attacks. Malicious activities are generally blocked at the single instance level.
Interoperability & Portability *APIs*	IPY-01	IPY-01.1	The provider shall use open and published APIs to ensure support for interoperability between components and to facilitate migrating applications.	Do you publish a list of all APIs available in the service and indicate which are standard and which are customized?	X			APIs for Morolabs SaaS customers are summarized within the documentation. Not all APIs are listed because, on request, it is possible to define custom API.
Interoperability & Portability *Data Request*	IPY-02	IPY-02.1	All structured and unstructured data shall be available to the customer and provided to them upon request in an industry-standard format (e.g., .doc, .xls, .pdf, logs, and flat files).	Is unstructured customer data available on request in an industry-standard format (e.g., .doc, .xls, or .pdf)?	X			Customers always retain ownership of their data and can export their data from Morolabs SaaS at any time in standard formats like CSV, PDF, HTML, ecc.
Interoperability & Portability *Policy & Legal*	IPY-03	IPY-03.1	Policies, procedures, and mutually-agreed upon provisions and/or terms shall be established to satisfy customer (tenant) requirements for service-to-service application (API) and information processing interoperability, and portability for application development and information exchange, usage, and integrity persistence.	Do you provide policies and procedures (i.e. service level agreements) governing the use of APIs for interoperability between your service and third-party applications?	X			APIs policies or SLA are the same of Morolabs SaaS.
		IPY-03.2		If using virtual infrastructure, do you allow virtual machine images to be downloaded and ported to a new cloud provider?		X		Morolabs utilizes cloud provider native images for best performance and security. User does not interact with the underlying infrastructure directly but, on customer request, it's possible to provide vm image.
		IPY-03.3		Do you provide policies and procedures (i.e. service level agreements) governing the migration of application data to and from your service?	X			Data migration is as complex as the two software applications to be migrated are far apart. The data is always the property of the customer so Morolabs policy is always oriented towards maximum portability.

Interoperability & Portability *Standardized Network Protocols*	IPY-04	IPY-04.1	The provider shall use secure (e.g., non-clear text and authenticated) standardized network protocols for the import and export of data and to manage the service, and shall make available a document to consumers (tenants) detailing the relevant interoperability and portability	Is data import, data export, and service management be conducted over secure (e.g., non-clear text and authenticated), industry accepted standardized network protocols?	X			Morolabs data in transit is over HTTPS via TLS 1.2 only.
		IPY-04.2		Do you provide consumers (tenants) with documentation detailing the relevant interoperability and portability network protocol standards that are involved?	X			Morolabs only utilizes HTTPS via port 443 and TLS 1.2.
Interoperability & Portability *Virtualization*	IPY-05	IPY-05.1	The provider shall use an industry-recognized virtualization platform and standard virtualization formats (e.g., OVF) to help ensure interoperability, and shall have documented custom changes made to any hypervisor in use, and all solution-specific virtualization hooks, available for customer review.	Do you use an industry-recognized virtualization platform and standard virtualization formats (e.g., OVF) to help ensure interoperability?	X			See response in IPY-03.2 above
		IPY-05.2		If using virtual infrastructure, are machine images made available to the customer in a way that would allow the customer to replicate those images in their own off-site storage location?	X			See response in IPY-03.2 above
		IPY-05.3		Do you have documented custom changes made to any hypervisor in use, and all solution-specific virtualization hooks available for customer review?			X	See the cloud infrastructure provider documentation for hypervisor information.
Mobile Security *Anti-Malware*	MOS-01	MOS-01.1	Anti-malware awareness training, specific to mobile devices, shall be included in the provider's information security awareness training.	Do you provide anti-malware training specific to mobile devices as part of your information security awareness training?			X	Wireless/mobile access to cloud infrastructure provider networks is not permitted. Customers are responsible for the control, security, and management of their mobile devices that are used to connect to Morolabs SaaS content
Mobile Security *Application Stores*	MOS-02	MOS-02.1	A documented list of approved application stores has been communicated as acceptable for mobile devices accessing or storing provider managed data.	Do you document and make available lists of approved application stores for mobile devices accessing or storing company data and/or company systems?			X	See response in MOS-01.1 above
Mobile Security *Approved Applications*	MOS-03	MOS-03.1	The company shall have a documented policy prohibiting the installation of non-approved applications or approved applications not obtained through a pre-identified application store.	Do you have a policy enforcement capability (e.g., XACML) to ensure that only approved applications and those from approved application stores can be loaded onto a mobile device?			X	See response in MOS-01.1 above
Mobile Security *Approved Software for BYOD*	MOS-04	MOS-04.1	The BYOD policy and supporting awareness training clearly states the approved applications, application stores, and application extensions and plugins that may be used for BYOD usage.	Does your BYOD policy and training clearly state which applications and applications stores are approved for use on BYOD devices?	X			Morolabs has a BYOD policy that is posted internally, and mobile security and acceptable use is part of the awareness training program.

Mobile Security *Awareness and Training*	MOS-05	MOS-05.1	The provider shall have a documented mobile device policy that includes a documented definition for mobile devices and the acceptable usage and requirements for all mobile devices. The provider shall post and communicate the policy and requirements through the company's security awareness and training program.	Do you have a documented mobile device policy in your employee training that clearly defines mobile devices and the accepted usage and requirements for mobile devices?	X			This mobile usage training is part of the new hire on-boarding process which every employee is part of.
Mobile Security *Cloud Based Services*	MOS-06	MOS-06.1	All cloud-based services used by the company's mobile devices or BYOD shall be pre-approved for usage and the storage of company business data.	Do you have a documented list of pre-approved cloud based services that are allowed to be used for use and storage of company business data via a mobile device?			X	See response in MOS-01.1 above
Mobile Security *Compatibility*	MOS-07	MOS-07.1	The company shall have a documented application validation process to test for mobile device, operating system, and application compatibility issues.	Do you have a documented application validation process for testing device, operating system, and application compatibility issues?			X	See response in MOS-01.1 above
Mobile Security *Device Eligibility*	MOS-08	MOS-08.1	The BYOD policy shall define the device and eligibility requirements to allow for BYOD usage.	Do you have a BYOD policy that defines the device(s) and eligibility requirements allowed for BYOD usage?			X	See response in MOS-05.1 above
Mobile Security *Device Inventory*	MOS-09	MOS-09.1	An inventory of all mobile devices used to store and access company data shall be kept and maintained. All changes to the status of these devices, (i.e., operating system and patch levels, lost or decommissioned status, and to whom the device is assigned or approved for usage (BYOD)), will be included for each device in the inventory.	Do you maintain an inventory of all mobile devices storing and accessing company data which includes device status (e.g., operating system and patch levels, lost or decommissioned, device assignee)?	X			
Mobile Security *Device Management*	MOS-10	MOS-10.1	A centralized, mobile device management solution shall be deployed to all mobile devices permitted to store, transmit, or process customer data.	Do you have a centralized mobile device management solution deployed to all mobile devices that are permitted to store, transmit, or process company data?			X	See response in MOS-01.1 above
Mobile Security *Encryption*	MOS-11	MOS-11.1	The mobile device policy shall require the use of encryption either for the entire device or for data identified as sensitive on all mobile devices and shall be enforced through technology controls.	Does your mobile device policy require the use of encryption for either the entire device or for data identified as sensitive enforceable through technology controls for all mobile devices?			X	See response in MOS-01.1 above
Mobile Security *Jailbreaking and Rooting*	MOS-12	MOS-12.1	The mobile device policy shall prohibit the circumvention of built-in security controls on mobile devices (e.g., jailbreaking or rooting) and is enforced through detective and preventative controls on the device or through a centralized device management system (e.g., mobile device management).	Does your mobile device policy prohibit the circumvention of built-in security controls on mobile devices (e.g., jailbreaking or rooting)?			X	See response in MOS-01.1 above
		MOS-12.2		Do you have detective and preventative controls on the device or via a centralized device management system which prohibit the circumvention of built-in security controls?			X	See response in MOS-01.1 above

Mobile Security *Legal*	MOS-13	MOS-13.1	The BYOD policy includes clarifying language for the expectation of privacy, requirements for litigation, e-discovery, and legal holds. The BYOD policy shall clearly state the expectations over the loss of non-company data in the case	Does your BYOD policy clearly define the expectation of privacy, requirements for litigation, e-discovery, and legal holds?	X			
		MOS-13.2		Does the BYOD policy clearly state the expectations over the loss of non-company data in case a wipe of the device is required?			X	See response in MOS-01.1 above
Mobile Security *Lockout Screen*	MOS-14	MOS-14.1	BYOD and/or company owned devices are configured to require an automatic lockout screen, and the requirement shall be enforced through technical controls.	Do you require and enforce via technical controls an automatic lockout screen for BYOD and company owned devices?			X	See response in MOS-01.1 above
Mobile Security *Operating Systems*	MOS-15	MOS-15.1	Changes to mobile device operating systems, patch levels, and/or applications shall be managed through the company's change management processes.	Do you manage all changes to mobile device operating systems, patch levels, and applications via your company's change management processes?			X	See response in MOS-01.1 above
Mobile Security *Passwords*	MOS-16	MOS-16.1	Password policies, applicable to mobile devices, shall be documented and enforced through technical controls on all company devices or devices approved for BYOD usage, and shall prohibit the changing of password/PIN lengths and authentication requirements	Do you have password policies for enterprise issued mobile devices and/or BYOD mobile devices?			X	See response in MOS-01.1 above
		MOS-16.2		Are your password policies enforced through technical controls (i.e. MDM)?			X	See response in MOS-01.1 above
		MOS-16.3		Do your password policies prohibit the changing of authentication requirements (i.e. password/PIN length) via a mobile device?			X	See response in MOS-01.1 above
Mobile Security *Policy*	MOS-17	MOS-17.1	The mobile device policy shall require the BYOD user to perform backups of data, prohibit the usage of unapproved application stores, and require the use of anti-malware software (where supported).	Do you have a policy that requires BYOD users to perform backups of specified corporate data?			X	See response in MOS-01.1 above
		MOS-17.2		Do you have a policy that requires BYOD users to prohibit the usage of unapproved application stores?			X	See response in MOS-01.1 above
		MOS-17.3		Do you have a policy that requires BYOD users to use anti-malware software (where supported)?			X	See response in MOS-01.1 above
Mobile Security *Remote Wipe*	MOS-18	MOS-18.1	All mobile devices permitted for use through the company BYOD program or a company-assigned mobile device shall allow for remote wipe by the company's corporate IT or shall have all company-provided data wiped by the	Does your IT provide remote wipe or corporate data wipe for all company-accepted BYOD devices?			X	See response in MOS-01.1 above
		MOS-18.2		Does your IT provide remote wipe or corporate data wipe for all company-assigned mobile devices?			X	See response in MOS-01.1 above
Mobile Security *Security Patches*	MOS-19	MOS-19.1	Mobile devices connecting to corporate networks or storing and accessing company information shall allow for remote software version/patch validation. All mobile devices shall have the latest available security-related patches installed upon general release	Do your mobile devices have the latest available security-related patches installed upon general release by the device manufacturer or carrier?			X	See response in MOS-01.1 above
		MOS-19.2		Do your mobile devices allow for remote validation to download the latest security patches by company IT personnel?			X	See response in MOS-01.1 above
Mobile Security *Users*	MOS-20	MOS-20.1	The BYOD policy shall clarify the systems and servers allowed for use or access on a BYOD-enabled device.	Does your BYOD policy clarify the systems and servers allowed for use or access on the BYOD-enabled device?			X	See response in MOS-01.1 above

		MOS-20.2		Does your BYOD policy specify the user roles that are allowed access via a BYOD-enabled device?			X	See response in MOS-01.1 above
Security Incident Management, E-Discovery, & Cloud Forensics *Contact / Authority Maintenance*	SEF-01	SEF-01.1	Points of contact for applicable regulation authorities, national and local law enforcement, and other legal jurisdictional authorities shall be maintained and regularly updated (e.g., change in impacted-scope and/or a change in any compliance obligation) to ensure direct compliance liaisons have been established and to be prepared for a forensic investigation requiring rapid engagement with law enforcement	Do you maintain liaisons and points of contact with local authorities in accordance with contracts and appropriate regulations?	X			Morolabs maintains contact with external parties such as regulatory bodies, service providers, and industry forums to ensure appropriate action can be quickly taken and advice obtained when necessary.
Security Incident Management, E-Discovery, & Cloud Forensics *Incident Management*	SEF-02	SEF-02.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to triage security-related events and ensure timely and thorough incident management, as per established IT service management policies and procedures.	Do you have a documented security incident response plan?	X			Incident management is delineated in data breach procedure defined for GDPR compliance
		SEF-02.2		Do you integrate customized tenant requirements into your security incident response plans?		X		Customers may specify a primary incident contact as part of their contract.
		SEF-02.3		Do you publish a roles and responsibilities document specifying what you vs. your tenants are responsible for during security incidents?	X			Morolabs has a Customer RACI Matrix which explains and outlines in detail the responsibilities during security incidents for both the tenants and Morolabs technical support team.
		SEF-02.4		Have you tested your security incident response plans in the last year?	X			Incident response plan tested annually
Security Incident Management, E-Discovery, & Cloud Forensics *Incident Reporting*	SEF-03	SEF-03.1	Workforce personnel and external business relationships shall be informed of their responsibility and, if required, shall consent and/or contractually agree to report all information security events in a timely manner. Information security events shall be reported through predefined communications channels in a timely manner adhering to applicable legal, statutory, or regulatory compliance obligations	Are workforce personnel and external business relationships adequately informed of their responsibility, and, if required, consent and/or contractually required to report all information security events in a timely manner?	X			Compliance art. 28 GDPR
		SEF-03.2		Do you have predefined communication channels for workforce personnel and external business partners to report incidents in a timely manner adhering to applicable legal, statutory, or regulatory compliance obligations?	X			Compliance art. 28 GDPR
Security Incident Management, E-Discovery, & Cloud Forensics *Incident Response Legal Preparation*	SEF-04	SEF-04.1	Proper forensic procedures, including chain of custody, are required for the presentation of evidence to support potential legal action subject to the relevant jurisdiction after an information security incident. Upon notification, customers and/or other external business partners impacted by a security breach shall be given the opportunity to participate as is legally permissible in the forensic	Does your incident response plan comply with industry standards for legally admissible chain-of-custody management processes and controls?	X			Morolabs Incident Response plan is in alignment with the GDPR requirements.
		SEF-04.2		Does your incident response capability include the use of legally admissible forensic data collection and analysis techniques?	X			
		SEF-04.3		Are you capable of supporting litigation holds (freeze of data from a specific point in time) for a specific tenant without freezing other tenant data?	X			Based on customer request Morolabs SaaS System Administrators can temporarily disable the access to application.

		SEF-04.4	permissible in the forensic investigation.	Do you enforce and attest to tenant data separation when producing data in response to legal subpoenas?	X			See response in SEF-04.3 above
Security Incident Management, E-Discovery, & Cloud Forensics *Incident Response Metrics*	SEF-05	SEF-05.1	Mechanisms shall be put in place to monitor and quantify the types, volumes, and costs of information security incidents.	Do you monitor and quantify the types, volumes, and impacts on all information security incidents?	X			According to GDPR requirements, information security incidents are classified into severity levels and processed according to the severity level provided by the number of registrations and data subjects involved.
		SEF-05.2		Will you share statistical information for security incident data with your tenants upon request?	X			This is considered company confidential data and not shareable.
Supply Chain Management, Transparency, and Accountability *Data Quality and Integrity*	STA-01	STA-01.1	Providers shall inspect, account for, and work with their cloud supply-chain partners to correct data quality errors and associated risks. Providers shall design and implement controls to mitigate and contain data security risks through proper separation of duties, role-based access, and least-privilege access for all personnel within their	Do you inspect and account for data quality errors and associated risks, and work with your cloud supply-chain partners to correct them?	X			Morolabs does not depend on data supply chain partners for its services but, upon request, it's possible to provide specific services.
		STA-01.2		Do you design and implement controls to mitigate and contain data security risks through proper separation of duties, role-based access, and least-privileged access for all personnel within your supply chain?	X			Morolabs SaaS uses cloud infrastructure providers whose risk management practices align with ISO 27001 and AgID qualified.
Supply Chain Management, Transparency, and Accountability *Incident Reporting*	STA-02	STA-02.1	The provider shall make security incident information available to all affected customers and providers periodically through electronic methods (e.g., portals).	Do you make security incident information available to all affected customers and providers periodically through electronic methods (e.g., portals)?	X			Security incident information available to all affected customers conformed to GDPR requirements. If a security incident were to affect numerous customers, it would be announced directly and via web site news.
Supply Chain Management, Transparency, and Accountability *Network / Infrastructure Services*	STA-03	STA-03.1	Business-critical or customer (tenant) impacting (physical and virtual) application and system-system interface (API) designs and configurations, and infrastructure network and systems components, shall be designed, developed, and deployed in accordance with mutually	Do you collect capacity and use data for all relevant components of your cloud service offering?	X			Cloud provider public service level agreements are available for review through the respective service providers.
		STA-03.2		Do you provide tenants with capacity planning and use reports?	X			Capacity is generally limited and increased on demand. Reports are sent to customer on specific request. Some installation has a dashboard to show see credits consumed, content and app usage.
Supply Chain Management, Transparency, and Accountability *Provider Internal Assessments*	STA-04	STA-04.1	The provider shall perform annual internal assessments of conformance and effectiveness of its policies, procedures, and supporting measures and metrics.	Do you perform annual internal assessments of conformance and effectiveness of your policies, procedures, and supporting measures and metrics?	X			Morolabs SaaS implements a robust continuous monitoring program to monitor risk which includes internal assessments at least annually.
Supply Chain Management, Transparency, and Accountability *Third Party Agreements*	STA-05	STA-05.1	Supply chain agreements (e.g., SLAs) between providers and customers (tenants) shall incorporate at least the following mutually-agreed upon provisions and/or terms: • Scope of business relationship and services offered (e.g., customer (tenant) data acquisition, exchange and usage, feature sets and functionality, personnel and infrastructure network	Do you select and monitor outsourced providers in compliance with laws in the country where the data is processed, stored, and transmitted?	X			Morolabs Cloud Infrastructure providers are AgID qualified, GDPR compliance because having data center only in EU countries.
		STA-05.2		Do you select and monitor outsourced providers to ensure that they are in compliance with applicable legislation?	X			See response in STA-05.1 above
		STA-05.3		Does legal counsel review all third-party agreements?	X			Morolabs lawyers review all agreements

		STA-05.4	personnel and infrastructure network and systems components for service delivery and support, roles and responsibilities of provider and customer (tenant) and any subcontracted or outsourced business relationships, physical geographical location of hosted services, and any known regulatory compliance considerations) • Information security requirements, provider and customer (tenant) primary points of contact for the duration of the business relationship, and references to detailed supporting and relevant business processes and technical measures implemented to enable effectively governance, risk management, assurance and legal, statutory and regulatory compliance obligations by all impacted business relationships • Notification and/or pre-authorization of any changes controlled by the provider with customer (tenant) impacts • Timely notification of a security	Do third-party agreements include provision for the security and protection of information and assets?	X			Compliance art. 28 GDPR
		STA-05.5		Do you have the capability to recover data for a specific customer in the case of a failure or data loss?	X			Backup retention is usually set to 15 days. If the recovery is within this range of days, it is always possible to recover lost data.
		STA-05.6		Do you have the capability to restrict the storage of customer data to specific countries or geographic locations?	X			See response in STA-05.1 above
		STA-05.7		Can you provide the physical location/geography of storage of a tenant's data upon request?	X			See response in STA-05.1 above
		STA-05.8		Can you provide the physical location/geography of storage of a tenant's data in advance?	X			See response in STA-05.1 above
		STA-05.9		Do you allow tenants to define acceptable geographical locations for data routing or resource instantiation?	X			See response in STA-05.1 above
		STA-05.10		Are systems in place to monitor for privacy breaches and notify tenants expeditiously if a privacy event may have impacted their data?	X			All security events that can be configured as data breaches are notified to tenants in accordance with the provisions of art. 33 GDPR.
		STA-05.11		Do you allow tenants to opt out of having their data/metadata accessed via inspection technologies?			X	
		STA-05.12		Do you provide the client with a list and copies of all subprocessing agreements and keep this updated?	X			See response in STA-05.1 above
Supply Chain Management, Transparency, and Accountability *Supply Chain Governance Reviews*	STA-06	STA-06.1	Providers shall review the risk management and governance processes of their partners so that practices are consistent and aligned to account for risks inherited from other members of that partner's cloud supply chain	Do you review the risk management and governance processes of partners to account for risks inherited from other members of that partner's supply chain?	X			See response in STA-05.1 above
Supply Chain Management, Transparency, and Accountability *Supply Chain Metrics*	STA-07	STA-07.1	Policies and procedures shall be implemented to ensure the consistent review of service agreements (e.g., SLAs) between providers and customers (tenants) across the relevant supply chain (upstream/downstream). Reviews shall be performed at least annually and identify non-conformance to established agreements. The reviews should result in actions to address service-level conflicts or inconsistencies resulting from disparate supplier relationships.	Are policies and procedures established, and supporting business processes and technical measures implemented, for maintaining complete, accurate, and relevant agreements (e.g., SLAs) between providers and customers (tenants)?	X			See response in STA-05.1 above
		STA-07.2		Do you have the ability to measure and address non-conformance of provisions and/or terms across the entire supply chain (upstream/downstream)?	X			See response in STA-05.1 above
		STA-07.3		Can you manage service-level conflicts or inconsistencies resulting from disparate supplier relationships?	X			See response in STA-05.1 above
		STA-07.4		Do you provide tenants with ongoing visibility and reporting of your operational Service Level Agreement (SLA) performance?		X		On request and regulated by terms.

		STA-07.5		Do you make standards-based information security metrics (CSA, CAMM, etc.) available to your tenants?		X		
		STA-07.6		Do you provide customers with ongoing visibility and reporting of your SLA performance?		X		On request and regulated by terms.
		STA-07.7		Do your data management policies and procedures address tenant and service level conflicts of interests?	X			
		STA-07.8		Do you review all service level agreements at least annually?	X			SLA are reviewed annually.
Supply Chain Management, Transparency, and Accountability *Third Party Assessment*	STA-08	STA-08.1	Providers shall assure reasonable information security across their information supply chain by performing an annual review. The review shall include all partners/third party providers upon which their information supply chain depends on.	Do you assure reasonable information security across your information supply chain by performing an annual review?	X			Morolabs uses cloud infrastructure providers whose information security & risk management practices align with stringent ISO 27001 and AgID requirements. Morolabs reviews the providers at least annually.
		STA-08.2		Does your annual review include all partners/third-party providers upon which your information supply chain depends?	X			See response in STA-08.1 for more information
Supply Chain Management, Transparency, and Accountability *Third Party Audits*	STA-09	STA-09.1	Third-party service providers shall demonstrate compliance with information security and confidentiality, access control, service definitions, and delivery level agreements included in third-party contracts. Third-party reports, records, and services shall undergo audit and	Do you mandate annual information security reviews and audits of your third party providers to ensure that all agreed upon security requirements are met?			X	See response in STA-08.1 for more information
		STA-09.2		Do you have external third party services conduct vulnerability scans and periodic penetration tests on your applications and networks?	X			Vulnerability scans and periodic penetration tests are conducted periodically by third parties on Morolabs SaaS applications and networks.
Threat and Vulnerability Management *Antivirus / Malicious Software*	TVM-01	TVM-01.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to prevent the execution of malware on organizationally-owned or managed user end-point devices (i.e., issued workstations, laptops, and mobile devices) and IT infrastructure network and systems components.	Do you have anti-malware programs that support or connect to your cloud service offerings installed on all of your IT infrastructure network and systems components?	X			All systems in Morolabs SaaS as well as administrator workstations have anti-malware installed.
		TVM-01.2		Do you ensure that security threat detection systems using signatures, lists, or behavioral patterns are updated across all infrastructure components as prescribed by industry best practices?	X			In alignment with security best practice and “Misure Minime” AgID requirements threat detection signatures and behavioural analysis tools used or installed on systems in Morolabs SaaS are updated daily.
Threat and Vulnerability Management *Vulnerability / Patch Management*	TVM-02	TVM-02.1	Policies and procedures shall be established, and supporting processes and technical measures implemented, for timely detection of vulnerabilities within organizationally-owned or managed applications, infrastructure network and system components (e.g., network vulnerability assessment, penetration testing) to ensure the efficiency of implemented security controls. A risk-based model for	Do you conduct network-layer vulnerability scans regularly as prescribed by industry best practices?	X			Vulnerability assessments against Morolabs SaaS are conducted at least monthly as part of the Continuous Monitoring Plan - including system, web application, database and port scans.
		TVM-02.2		Do you conduct application-layer vulnerability scans regularly as prescribed by industry best practices?	X			See response in TVM-02.1
		TVM-02.3		Do you conduct local operating system-layer vulnerability scans regularly as prescribed by industry best practices?	X			See response in TVM-02.1

		TVM-02.4	controls. A risk-based model for prioritizing remediation of identified vulnerabilities shall be used. Changes shall be managed through a change management process for all vendor-supplied patches, configuration changes, or changes to the organization's internally developed software. Upon request, the provider informs customer (tenant) of policies and procedures and identified weaknesses especially if customer (tenant) data is used as part the service and/or customer (tenant) has some	Will you make the results of vulnerability scans available to tenants at their request?	X			Customers can request a copy of the most recent report to see vulnerabilities but After NDA signature.
		TVM-02.5		Do you have a capability to patch vulnerabilities across all of your computing devices, applications, and systems?	X			Morolabs releases which include patches and bug fixes are performed monthly. Security patches are deployed day by day by default, like critical risk vulnerabilities that are patched immediately.
		TVM-02.6		Do you inform customers (tenant) of policies and procedures and identified weaknesses if customer (tenant) data is used as part the service and/or customer (tenant) has some shared responsibility over implementation of control?	X			Only on demand or in case of incident or data breach
Threat and Vulnerability Management *Mobile Code*	TVM-03	TVM-03.1	Policies and procedures shall be established, and supporting business processes and technical measures implemented, to prevent the execution of unauthorized mobile code, defined as software transferred between systems over a trusted or untrusted	Is mobile code authorized before its installation and use, and the code configuration checked, to ensure that the authorized mobile code operates according to a clearly defined security policy?	X			Morolabs SaaS does not require installable mobile code such as MS ActiveX, Adobe Flash, and MS Silverlight.
		TVM-03.2		Is all unauthorized mobile code prevented from executing?	X			See response in TVM-03.1 above