



Asia's Financial Services: Ready for the Cloud

Securities Regulations Impacting Cloud
in Japan and 2016 Update

アジアの金融サービス:
クラウドセキュリティ規制への準備。
日本への影響と2016年の最新動向。

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I. Asia's Financial Services: Ready for the Cloud

The Asia Cloud Computing Association (ACCA) released its report on cloud-relevant regulations in the Financial Services Industry in Mar 2015. The report compared regulations in 14 Asia Pacific markets, in nine specific areas: 1. Processes for adopting cloud, 2. Contracts for cloud Services, 3. Data location, 4. Data use limitations, 5. Security, 6. Data segregation, 7. Business continuity, 8. Audit, review and monitoring, 9. Exit.

It also mapped each of the 14 countries against five specific policy recommendations for improving conditions for cloud computing adoption by the financial sector, that:

1. Regulations should be technology neutral. There should not be separate regulations for the use of Cloud Services.
2. Regulations should set out a clear process that should be followed for the adoption of Cloud Services (as if it were any other form of outsourcing) and approval for the use of Cloud Services should not be required.
3. The transfer of Data to other jurisdictions should be permitted, subject to appropriate safeguards (e.g. security, business continuity, access and audit).
4. Regulations should only identify the key issues that should be addressed in outsourcing contracts that include Cloud Services. They should not be prescriptive of the terms of an outsourcing contract that includes Cloud Services.
5. The use of independent third party audits should be an acceptable alternative to audits carried out by FSIs and the Regulators.

Since the report's release in Mar 2015, it has been warmly received by many regional regulators, and used to inform many public consultations and public-private dialogue sessions. Following a number of key updates in the region, we have updated the ACCA's summary assessment of all Asia Pacific economies against the five cloud regulation recommendations for the financial services sector (see Table 1.)

II. Regulatory Update

To date, a number of regulatory updates have taken place, as Asia Pacific's financial regulators move to adjust and update their outsourcing and risk management policies to accommodate the added agility and innovation cloud computing technologies offer the financial industry.

Outsourcing Guidelines

The most pertinent change in regulations has come from **South Korea's** Financial Services Commission (FSC) and Financial Services Supervisor (FSS) reducing the burden placed on domestic FSIs outsourcing data processing. No longer do FSIs have to receive permission to outsource data from Korea, they only have to inform the FSS that they are having cross-border data flows. They are able to inform the FSS either before or after the outsourcing event, instead of waiting for permission in the past. These FSIs also no longer have to sign the standard form contract when contracting with cloud service providers (CSP).¹

¹ ACCA (2016), Update on the Korea's Financial Services on the Cloud, <http://asiacloudcomputing.org/research/fsi2015/29-products/298-fsi2015-update>

Following extensive consultations with the private sector, **Singapore** also released new Guidelines on Outsourcing Risk Management in Jul 2016², expanding the guidance on prudential risk management practices for outsourcing, and specifically introducing a new section on cloud computing which clarifies the Monetary Authority of Singapore's stance on cloud computing. This was followed swiftly by the Association of Banks in Singapore's Implementation Guide on Cloud Services, released on 4 Aug 2016, giving further clarity to financial institutions moving to cloud services.

Reviews of outsourcing policies are also underway in other locales. Open consultations for the Reserve Bank of **New Zealand's** (RBNZ) review of their outsourcing policy for registered banks have also been underway³, publishing two consultation papers for policy review. As cloud computing continues to mainstream as a core component for all technology, we expect to see other countries also updating their outsourcing and risk management guidelines similarly.

Fintech and Regulatory Sandboxes

Governments have put additional focus on fintech and innovation in recent months. **Australia**⁴, **Hong Kong**⁵, **Singapore**⁶, and **Malaysia**⁷, have either launched or are proposing Fintech Regulatory Sandboxes to support innovation in the financial technology sector. Further, **Singapore** has created a Fintech Innovation Lab to help promote the country as a fintech hub. Additionally, it has signed an agreement with Switzerland to cross-promote each nations fintech companies⁸, and both **South Korea** and **Singapore** have signed "Fintech Bridges" with the United Kingdom to help cross promote both fintech firms and investors across borders.^{9,10} **South Korea** has also launched a Fintech Open Platform that allows for companies to use a standardize set of API commands to help with various banking functions, including money transfers.¹¹

With the lines between payments and remittances being blurred by fintech, governments have also tried to inject strength into the banking sector for possible technology disruption. **Taiwan** has required FSIs to hold 0.5-1% of net profits over the next two fiscal years. This is intended to protect industry personnel from disruption by fintech companies. The funds will be used to help re-train, relocate, and re-assign employees if they are disrupted by the fintech industry's rise.¹²

Singapore has also proposed changing legislation to combine the Payment Systems (Oversight) Act (PS(O)A) and the Money-changing and Remittance Businesses Act (MCRBA) under a single act. This combination will cover licensure, registration, and supervision of all payments. The goal is to

² <http://www.mas.gov.sg/News-and-Publications/Media-Releases/2016/MAS-Issues-New-Guidelines-on-Outsourcing-Risk-Management.aspx>

³ <http://www.rbnz.govt.nz/-/media/ReserveBank/Files/regulation-and-supervision/banks/consultations/Final-consultation-outsourcing-policy-for-registered-banks-May2016.pdf?la=en>

⁴ <http://fintech.treasury.gov.au/australias-fintech-priorities/>

⁵ <http://www.hkma.gov.hk/media/eng/doc/key-information/guidelines-and-circular/2016/20160906e1.pdf>

⁶ <http://www.mas.gov.sg/News-and-Publications/Media-Releases/2016/MAS-Proposes-a-Regulatory-Sandbox-for-FinTech-Experiments.aspx>

⁷ http://www.bnm.gov.my/index.php?ch=en_press&pg=en_press_all&ac=3443

⁸ <http://www.mas.gov.sg/News-and-Publications/Media-Releases/2016/Singapore-and-Switzerland-to-Expand-Cooperation-on-FinTech.aspx>

⁹ <http://www.mas.gov.sg/News-and-Publications/Media-Releases/2016/First-ever-FinTech-Bridge-established-between-Britain-and-Singapore.aspx>

¹⁰ http://www.fsc.go.kr/eng/new_press/releases.jsp?menu=01&bbsid=BBS0048

¹¹ <http://www.fsc.go.kr/downManager?bbsid=BBS0048&no=109510>

¹² http://www.sfb.gov.tw/en/home.jsp?id=79&parentpath=0,4&mcustomize=multimessage_view.jsp&dataserno=201608160001&aplistdn=ou=bulletin,ou=multisite,ou=english,ou=ap_root,o=fsc,c=tw&toolsflag=Y

increase consumer protection, anti-money laundering and cyber security of cross-border and domestic payments.¹³

National Payment Gateways

Finally, moving beyond regulatory updates, some APAC economies are working on accelerating online payment adoption. **Indonesia**¹⁴, **Thailand**, **Vietnam**¹⁵ have proposed National Payment Gateways which will encourage all transactions, particularly e-payments related to government sector payments (e.g. licenses, taxes, fines etc) can be paid electronically. **Thailand** has already rolled out the first step of its plan with “PromptPay”, which allows for anyone with a national ID and a telephone to be able to have peer to peer transferring and business payments with only knowing either the ID number of the recipient or the bank account information.¹⁶

Table 1: Summary assessment of all Asia Pacific economies against the ACCA’s five cloud regulation recommendations for the financial services sector

Recommendation	Australia	China	Hong Kong	India	Indonesia	Japan	Malaysia	New Zealand	Philippines	Singapore	South Korea	Taiwan	Thailand	Vietnam
1. Regulations should be technologically neutral. There should not be separate regulations for the use of Cloud Services.	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
2. Regulations should set out a clear process that should be followed for the adoption of Cloud Services (as if it were any other form of outsourcing) and approval for the use of Cloud Service should not be required.	Red	Red	Green	Green	Red	Green	Red	Green	Red	Red	Green	Red	Red	Red
3. The transfer of Data to other jurisdictions should be permitted, subject to appropriate safeguards (e.g. security, business continuity, access, and audit).	Green	Red	Green	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green
4. Regulations should only identify the key issues that should be addressed in Cloud Contracts. They should not be prescriptive of the terms of Cloud Contracts.	Red	Red	Green	Red	Green	Green	Green	Green	Red	Red	Green	Red	Green	Green
5. The use of independent third party audits should be an acceptable alternative to audits carried out by FSIs and the Regulators.	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red

 Recommendation implemented

 Recommendation not implemented

Source: Asia Cloud Computing Association, 2016

III. Securities Regulations Impacting Cloud in Japan (English)

As our earlier report focused only on the banking sector, we found that there were sufficiently substantial differences in the regulations around the securities industry, which warranted a closer

¹³ <http://www.mas.gov.sg/News-and-Publications/Media-Releases/2016/MAS-Proposes-New-Regulatory-Framework-and-Governance-Model-for-Payments.aspx>

¹⁴ <http://www.thejakartapost.com/news/2015/12/14/bi-working-integrated-national-payment-system.html>

¹⁵ <http://banking.org.vn/2016/en/national-payment-corporation-of-vietnam/>

¹⁶ <https://www.bot.or.th/Thai/PressandSpeeches/Press/News2559/n3159e.pdf>

regulatory review. This section provides new research featuring regulation impacting the use of cloud by securities firms in Japan.

A. Overview

Is the use of Cloud Services permitted?	Yes.
Who are the relevant Regulators?	The Financial Services Agency (www.fsa.go.jp/en/ , 金融庁) ("FSA") is responsible for overseeing FSIs. The Securities and Exchange Surveillance Commission (www.fsa.go.jp/sesc/english/index.htm , 証券取引等監視委員会) ("SESC") The Centre for Financial Industry Information Systems (www.fisc.or.jp/english/ , 金融情報システムセンター) ("FISC").
Are there specific regulations dealing exclusively with Cloud Services?	No.
Are there other regulations/guidelines that are relevant?	Yes. See Section B.
Is regulatory approval required?	No.
Is there a process to follow? If so what is the process and is there a specific form/questionnaire to be completed?	No. There are no specific forms or questionnaires that an FSI must complete when considering adopting Cloud Services.
Are there specific contractual requirements that must be adopted?	Yes. The FSA mandates contractual requirements that must be agreed by FSIs with CSPs. These are not set out in one list in any one place but scattered across the different regulations referred to in Section B.
Other information/developments	The FISC has stipulated certain requirements relating to Cloud Services in its standards. Since April 2014, the FISC has been examining the use of Cloud Service by FSIs and the FISC has revised of certain requirements to promote Cloud Services adoption in June 2015. The FSA's documents also refer to the FISC's standards and therefore FSIs are advised to comply with them ¹⁷ .

B. Relevant Regulations

Full Title	Abbreviated Title	Regulator	Citation/Reference
The Act on the Protection of Personal Information	APPI	The Consumer Affairs Agency	Act No. 57 of May 30, 2003
The Banking Act	Banking Act	FSA	Act No. 59 of June 1, 1981
The Insurance Business Act	IBA	FSA	Act No. 105 of June 7, 1995
The Financial Instruments and Exchange Act	FIEA	FSA	Act No. 25 of 1948
Comprehensive Guidelines for Supervision of Insurance Companies	Insurance Guideline	FSA	N/A

¹⁷ Note that in Japan, banks, insurance companies and securities companies are subject to separate regulations. Comprehensive guidelines for supervisions and inspection manuals for banks and insurance companies refer the FISC Guidelines, and recommend checking the FISC Guidelines in all relevant sections, including the section for cloud regulation in it. On the other hand, comprehensive guidelines and inspection manuals for security companies refer the FISC guidelines only in the section about contingency plans. Written regulations for FIBOs, including security companies, seem less strict on the face of it, and it seems that one of the reasons of such less strict descriptions is the coverage of FIBOs Guidelines. The FIBOs Guidelines cover small Financial Instruments Business Operators that do not use sophisticated financial industry information systems, as well as major security companies in Japan. However, it seems that major players in the area of security companies comply with the FISC guidelines in all relevant sections to build robust information security systems.

Comprehensive Guidelines for Supervision of Major Banks	Banks Guidelines	FSA	N/A
Comprehensive Guidelines for Supervision of Financial Instruments Business Operators etc.	FIBOs Guidelines	FSA	N/A
Guidelines for Personal Information Protection in the Financial Field	PI Guidelines	FSA	N/A
Inspection Manual for Insurance Companies	Insurance Manual	FSA	N/A
The Inspection Manual for Deposit-Taking Institutions	Banks Manual	FSA	N/A
Inspection Manual for Financial Instruments Business Operators	FIBOs Manual	SESC	N/A
FISC Security Guidelines on Computer Systems	FISC Guidelines	FISC	N/A

C. Summary of the key requirements

Topic	Summary	Citation
Due diligence	FSIs must carry out a risk assessment. In summary, this must include: risk identification; analysis and quantification of the potential impact and consequences of these risks; risk mitigation and control strategy; and ongoing risk monitoring and reporting.	Section II and III of the Banks Guidelines Section II and III of the Insurance Guidelines
	FSIs must specifically examine the possible risks to their own Customers.	Section II and III of the FIBOs Guidelines
	FSIs must have defined procedures to select a CSP. FSIs must consider: (a) whether the CSP can provide a sufficient level of services; (b) whether the CSP's finance position and operations are capable of securing the provision of the services and bearing possible losses in accordance with the Cloud Contract; and (c) any reputational issues e.g. relationship between the CSP and anti-social forces.	Section III of the Banks Manual Section II of the Insurance Manual Section II of the FIBOs Manual
		Section XIV of the FISC Guidelines
Review, monitoring and control	The CSP must promptly provide to the FSI appropriate information, as required, in addition to periodic reports regarding the services. The Cloud Contract must specify the contents of the periodic reports to be provided by the CSP to the FSI in relation to the services.	Section III of the Banks Guidelines and Sections II and III of the Banks Manual
	The Cloud Contract must include provisions that concern supervision, monitoring and reporting. CSPs must have a procedure in place to report any problems to the FSI.	Section II of the Insurance Guidelines and Sections II and III of the Insurance Manual Section III of the FIBO Guidelines and Section II of the FIBOs Manual
Audit	The Cloud Contract must specify audit rights.	Section III of the Bank Guidelines and Section III of the Bank Manual
	The CSP must regularly subject its operations to audits and report the audit results to the FSI.	Section II of the Insurance Guideline and

		Section III of the Insurance Manual
		Section II of the FIBOs Manual
Confidentiality and security	<p>The CSP must have a system in place to promptly report to the FSI if there has been a security breach or a system problem.</p> <p>The Cloud Contract must include confidentiality obligations. The CSP must ensure security with regard to the following:</p> <p>(a) physical security, including prevention of physical intrusion and crime prevention; (b) logical security, including measures to protect electronic intrusion; (c) prevention of unauthorised use; (d) computer viruses; and (e) fire, earthquake and flooding.</p> <p>The CSPs systems must be protected through measures such as the use of a password system for access, an identification system and encoding. The CSP must ensure that its staff are aware of the importance of the confidentiality of the Data.</p>	<p>Sections I, II and III of the Banks Guideline and Sections I, II and III of the Bank Manual</p> <p>Section III of the Insurance Guidelines and Sections I, II and III of the Insurance Manual</p> <p>Section III of the FIBOs Guidelines and Section II of the FIBOs Manual</p>
Resilience and business continuity	<p>The Cloud Contract must specify the backup obligations and the failure and disaster recovery routines.</p> <p>FSIs must set a recovery target for the CSP. FSIs and the CSPs must test the contingency plans of the CSP.</p> <p>FSIs must ensure that there is a contingency plan in place which includes arrangements and procedures for dealing with emergencies, natural disasters, terrorism and IT issues.</p> <p>FSIs and CSPs must conduct training on the contingency plans.</p> <p>FSIs must ensure that the Cloud Services will not cause serious problems to its business or its Customers if the Cloud Services are not provided. The FSI must ensure that there are appropriate back-up measures. The back-up measures must avoid geographic concentration.</p>	<p>Section XIV of the FISC Guidelines</p> <p>Section II and III of the Bank Guideline and Sections II and III of the Bank Manual</p> <p>Section II of the Insurance Guideline and Section III of the Insurance Manual</p> <p>Section III of the FIBOs Guidelines and Section II of the FIBOs Manual</p>
Data location	There are no specific requirements.	N/A
Data use	The Cloud Contract must include prohibitions on unintended use of the Data by the CSP.	<p>Section III of the Bank Guideline and Section II of the Bank Manual</p> <p>Section II of the Insurance Guideline and Section III of the Insurance Manual</p> <p>Section III of the FIBOs Guidelines and Section II of the FIBOs Manual</p>
Data segregation	There are no specific requirements.	N/A
Subcontracting	The CSP must adequately supervise subcontractors. The Cloud Contract must specify the subcontracting procedures.	<p>Sections II and III of the Banks Guidelines</p> <p>Section III of the Insurance Guidelines</p>

		<p>Section III of the FIBOs Guidelines and Section II of the FIBOs Manual</p> <p>Section XIV of the FISC Guidelines</p>
Termination	The FSI must be able to terminate the Cloud Contract where necessary. The Cloud Contract must specify the termination rights and that the Data must be deleted by the CSP on termination.	<p>Section II of the Banks Manual</p> <p>Section II of the Insurance Manual</p> <p>Section XIV of the FISC Guidelines</p>

IV. 日本規制 Securities Regulations Impacting Cloud in Japan

A. 概要

クラウドサービスの使用は許可されていますか？	はい。
関係規制当局は？	金融庁 (www.fsa.go.jp/en/) (「FSA」) が FSI の監督を担当。 証券取引等監視委員 (www.fsa.go.jp/sesc/english/index.htm) (「SESC」) 金融情報システムセンター (www.fisc.or.jp/english/) (「FISC」)。
クラウドサービスを専門に取り扱った特別規制はありますか？	いいえ。
他に関連性のある規制や指針はありますか？	はい。セクション B を参照。
規制当局の承認は必要ですか？	いいえ。
従うべき手順はありますか？ ある場合は、どんな手順ですか？ 特定の用紙や質問表に記入する必要はありますか？	いいえ。クラウドサービスの採用を検討する際に、FSI が記入しなければならない特定の用紙や質問表はありません。
採用しなければならない特定の契約要求事項はありますか？	はい。FSA は、FSI と CSP が合意すべき契約上の要件を義務付けています。これらは一箇所に一覧表として規定されていませんが、セクション B に記載されている様々な規制に散在しています。
その他の情報・展開	FISC は基準の中でクラウドサービスに関連する特定の要件を規定しています。2014 年 4 月以降、FISC は FSI によるクラウドサービスの利用を調査しており、2015 年 6 月のクラウドサービス採用を促進するために特定の要件を改定しました。FSA の文書は FISC の基準も参照しているため、FSI はこれらの基準にも準拠することが推奨されます。 ¹⁸

¹⁸ 日本では、銀行、保険会社、証券会社が異なる規制が課されていることに注意が必要です。銀行と保険会社向けの総合的な監督指針および検査マニュアルは FISC ガイドラインを参照し、クラウド規制に関するセクションを含む、すべての関連セクションにおいて、FISC ガイドラインを確認することを推奨しています。その一方で、証券会社向けの総合的な指針と検査マニュアルは、コンティンジェンシープランに関するセクションのみにおいて、FISC ガイドラインを参照しています。証券会社を含む FIBO 向けの規制書は、表面的には銀行・保険会社向けよりも緩和的なようです。このように緩和的な記述になっている理由のひとつは、FIBO ガイドラインの適用範囲にあるでしょう。FIBO ガイドラインは、日本の主要証券会社のほか、洗練された金融業界情報システムを使用しない小規模な金融商品取引業者も対象としているためです。ただし、証券会社部門の主要事業者は、堅牢な情報セキュリティシステムを構築するため、FISC ガイドラインの関連セクションすべてに準拠しているようです。

B. 関連規制

正式名称	略称	規制当局	引用/参照
個人情報保護に関する法律	APPI	消費者庁	平成十五年五月三十日法律第五十七号
銀行法	銀行法	FSA	昭和五十六年六月一日法律第五十九号
保険業法	IBA	FSA	平成七年六月七日法律第百五号
金融商品取引法	FIEA	FSA	昭和二十三年法律第二十五号
保険会社向けの総合的な監督指針	保険指針	FSA	該当なし
主要行等向けの総合的な監督指針	銀行指針	FSA	該当なし
金融商品取引業者等向けの総合的な監督指針	FIBO 指針	FSA	該当なし
金融分野における個人情報保護に関するガイドライン	PI ガイドライン	FSA	該当なし
保険会社に係る検査マニュアル	保険検査マニュアル	FSA	該当なし
預金等受入金融機関に係る検査マニュアル	銀行検査マニュアル	FSA	該当なし
金融商品取引業者等検査マニュアル	FIBO 検査マニュアル	SESC	該当なし
金融機関等コンピュータシステムの安全対策基準書	FISC ガイドライン	FISC	該当なし

C. 主要要求事項の概要

テーマ	概要	引用
デューデリジ ェンス	<p>FSI はリスク評価を実施しなければならない。要約すれば、これには以下が含まれる：リスクの特定、これらのリスクの潜在的影響と結果の分析および定量化、継続的リスク監視と報告。</p> <p>FSI は自社の顧客に生じ得るリスクを具体的に調査しなければならない。</p> <p>FSI は、CSP の選定手続きを定義済みでなければならない。FSI は以下を検討すること：(a) CSP が十分なレベルのサービスを提供できるか、(b) CSP の財務状況と運営は、クラウド契約に準拠してサービス提供を確保し、発生し得る損失を負担できるか、(c) 評判上の問題がないか。例えば、CSP と反社会的勢力との関係など。</p>	<p>銀行指針のセクション II、III</p> <p>保険指針のセクション II、III</p> <p>FIBO 指針のセクション II、III</p> <p>銀行検査マニュアルのセクション III</p> <p>保険検査マニュアルのセクション II</p> <p>FIBO 検査マニュアルのセクション II</p> <p>FISC ガイドラインのセクション XIV</p>
評価、監視、 管理	<p>CSP は、サービスに関する定期報告書に加えて、要求に応じて速やかに FSI に適切な情報を提供しなければならない。クラウド契約には、サービスに関連して CSP が FSI に提供する定期報告書の内容が指定されており、また、監督、監視、報告に関する条項が含まれていること。CSP は、FSI に問題を報告するための手続きを整備している必要がある。</p>	<p>銀行指針のセクション III、銀行検査マニュアルのセクション II、III、保険指針のセクション II、保険検査マニュアルの II、III</p> <p>FIBO 指針のセクション III、FIBO 検査マニュアルのセクション II</p>
監査	<p>クラウド契約には、監査権が指定されていること。</p> <p>CSP は定期的に運営の監査を受け、監査結果を FSI に報告しなければならない。</p>	<p>銀行指針のセクション III、銀行検査マニュアルのセクション III</p> <p>保険指針のセクション II、保険検査マニュアルのセクション III</p> <p>FIBO 検査マニュアルのセクション II</p>
守秘義務とセ キュリティ	<p>CSP は、セキュリティ違反やシステムの問題があった場合に、速やかに FSI に報告するシステムを整備しておく必要がある。</p> <p>クラウド契約には、守秘義務条項が含まれていること。</p> <p>CSP は以下に関するセキュリティを確保する：(a) 物理的侵入の防止や犯罪防止を含む物理的セキュリティ、(b) 電子的侵入の保護対策を含む論理的セキュリティ、(c) 不正使用の防止、(d) コンピューターウイルス、(e) 火災、地震、洪水。</p> <p>CSP システムは、パスワードによるアクセスシステム、識別システム、符号化といった対策によって保護されていなければならない。CSP は、スタッフにデータ守秘義務の重要性を認識させる必要がある。</p>	<p>銀行指針のセクション I、II、III、銀行検査マニュアルのセクション I、II、III</p> <p>保険指針のセクション III、保険検査マニュアルのセクション I、II、III</p> <p>FIBO 指針のセクション III、FIBO 検査マニュアルのセクション II</p>
障害耐性と事 業継続	<p>クラウド契約には、バックアップの義務、および障害・災害復旧活動が指定されていること。</p> <p>FSI は CSP の復旧目標を設定する必要がある。FSI と CSP は、CSP のコンティンジェンシープランをテストしなければならない。</p>	<p>FISC ガイドラインのセクション XIV</p> <p>銀行指針のセクション II、III、銀行検査マニュアルのセクション II、III</p>

	<p>FSIは、非常時、自然災害、テロ、ITの問題に対処する準備と手順を含むコンティンジェンシープランが整備されていることを確認する。</p> <p>FSIとCSPは、コンティンジェンシープランのトレーニングを実施しなければならない。</p> <p>FSIは、クラウドサービスが提供されない場合に、クラウドサービスが自社の事業と顧客に深刻な問題を生じさせないことを確認し、また、適切なバックアップ対策があることを確認する。バックアップ対策は地理的な偏りを避けなければならない。</p>	<p>保険指針のセクション II、 保険検査マニュアルのセクション III</p> <p>FIBO 指針のセクション III 、FIBO 検査マニュアルのセクション II</p>
データの場所	具体的な要件はなし。	該当なし
データの使用	クラウド契約には、 CSP がデータを目的以外に使用することを禁じる条項が含まれていること。	<p>銀行指針のセクション III、 銀行検査マニュアルのセクション II</p> <p>保険指針のセクション II、 保険検査マニュアルのセクション III</p> <p>FIBO 指針のセクション III 、FIBO 検査マニュアルのセクション II</p>
データ分離	具体的な要件はなし。	該当なし
下請	CSP は下請業者を適切に監督しなければならない。 クラウド契約には、下請手続きが指定されていること。	<p>銀行指針のセクション II、 III</p> <p>保険指針のセクション III</p> <p>FIBO 指針のセクション III 、FIBO 検査マニュアルのセクション II</p> <p>FISC ガイドラインのセクション XIV</p>
契約終了	FSI は、必要な場合にクラウド契約を終了できるものとする。クラウド契約には、解約権が指定されていない場合、データは契約終了時に CSP によって削除されなければならない。	<p>銀行検査マニュアルのセクション II</p> <p>保険検査マニュアルのセクション II</p> <p>FISC ガイドラインのセクション XIV</p>

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The ACCA is a leading industry association comprising the stakeholders of the cloud computing ecosystem in Asia. The ACCA works to ensure that the interests of the cloud computing community are effectively represented in the public policy debate. Our primary mission is to accelerate the growth of the cloud market in Asia, where we promote the growth and development of cloud computing in Asia Pacific through dialogue, training, and public education. Through regular meetings, we also provide a platform for members to discuss implementation and growth strategies, share ideas, and establish policies and best practices relating to the cloud computing ecosystem.

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