Cloud service provider disclosure

The form is to be completed for each cloud service provided. For questions not applicable or not disclosed, indicate accordingly in the remarks.

Date of disclosure: 2022-09-15

Applicable cloud service(s): Microsoft 365

Cloud Service Provider Contact Information

Company name: Microsoft Corporation Primary address: One Microsoft Way

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Certification Body Contact Information

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Cloud Service Provider Background

Overview of service offering:

Office 365 (O365) is a multi-tenant cloud computing-based subscription service offering from Microsoft. Cloud computing has been defined by NIST as a model for enabling convenient, on-demand network access to a shared pool of configurable computing resources (e.g., networks, servers, storage, applications, and services) that can be rapidly provisioned and released with minimal management effort or cloud provider interaction. Further, as defined within NIST SP 800-145 (The NIST Definition of Cloud Computing), the service model for O365 is Software-as-a-Service (SaaS). SaaS is a model of software deployment whereby one or more applications and the computational resources to run them are provided for use on demand as a turnkey service.

Its main purpose is to reduce the total cost of hardware and software development, maintenance, and operations. Security provisions are carried out mainly by the cloud provider. The cloud subscriber does not manage or control the underlying cloud infrastructure or individual applications, except for preference selections and limited administrative application settings.

O365 provides customers with cloud versions of Exchange Online (EXO), Information Protection (IP), SharePoint Online (SPO) (including Project Online), Microsoft Teams (including Azure Communication Services), Skype for Business (SfB), Windows 365 and other features. Exchange Online is an email service. SharePoint Online is a solution for creating sites to share documents and information. Microsoft Teams and Skype for Business are communication services that offer instant messaging, audio and video calling, online meetings, and web conferencing capabilities.





Excha Share Inform MS T Skyp Office Office Suite Delve	e 365 services in ange Online ePoint Online mation Protection eams (including e for Business e Online e Services Infras User Experience/Loki	n Azure Communication Services) tructure	
	se see <u>https://pr</u> ce offerings.	roducts.office.com/en-us/business/explore-office-365	i-for-business for Office 365's full
Servi	ce model:		
	☐ Virtual ma	chine instances owned by the user	
	☐ Network fa	acilities	
Deplo	⊠ Compliand	ce with applicable standards	
	☐ Private clo	oud	
	☐ Communi	tv cloud	
	☐ Hybrid clo		
Tier:	⊠ Public clo	ua	
	Level 1		
	 ☐ Level 2		
	☐ Level 3		
No.	Criteria	Description	Remarks
Lega	I and Complianc	e	
1.	Right to audit	The user has the right to audit:	By providing customers with
		☐ Virtual machine instances owned by the user	compliant and independently verified cloud services, Microsoft
		☐ Network facilities	makes it easier under the shared
		□ Compliance with applicable standards	responsibility model for customers to achieve compliance
		Technical controls	for software services they run in the cloud. Microsoft Office 365
		□ Policies and governance	provides customers with detailed

		□ Data centre facilities □ Others □ None Regulators recognised by Singapore law have the right to audit: □ Virtual machine instances owned by the user □ Network facilities □ Compliance with applicable standards □ Technical controls □ Policies and governance □ Data centre facilities	and compliance programs, audit reports, and compliance packages, to help customers assess our services against their own legal and regulatory requirements. In addition, Microsoft has developed an extensible compliance framework that enables Office 365 to design and build services using a single set of controls to speed up and simplify compliance across a diverse set of regulations and rapidly adapt to changes in the regulatory landscape. Microsoft provides a compliance program for financial service customers. Please check with
		□ Others □ None Audit / assessment reports that can be made available on request: □ Penetration test □ Threat and vulnerability risk assessment □ Vulnerability scan □ Audit reports (e.g. Statement on Standards for Attestation Engagements (SSAE) No. 16, Reporting on Controls at a Service Organisation)	your account manager. Office 365 undergoes annual Third Party Auditor penetration testing against the environment as part of Independent Verification. Customers can conduct independent penetration tests after notifying Microsoft. In addition, the Third Party assessors conduct detailed review of Risk Assessment and Vulnerability Scans. The findings of these assessments are documented within their assessment(s). Additional information on Independent Verification can be found here: https://www.microsoft.com/enus/trust-center#compliance
2.	Compliance	The following guidelines / standards / regulations are adhered to: ☑ Singapore Personal Data Protection Act ☑ ISO / IEC 27001	Independently Verified Office 365 services have achieved compliance with the following certifications: • ISO/IEC 27001:2013 • ISO/IEC 27017:2015

		The cloud User retains the ownership on the derived data or attributes of cloud usage except for the following: Advertising or marketing Statistics analysis on usage Others	https://www.microsoft.com/en- us/trust-center/privacy/data- management
4.	Data retention	Data deleted by the user is retained as follows: ☐ Minimum data retention period is: 0 Days ☐ Maximum data retention period is: 30 Days_ ☐ Deleted immediately ☐ Log data is retained for a period of: ☐ Minimum data retention period as follows: _90 Days_ ☐ Maximum data retention period is: 180 days ☐ Not retained ☐ User data is retained for a period of: ☐ Minimum data retention period is: 90 days after account closure ☐ Maximum data retention period is: _180 days after account closure ☐ Not retained ☐ Not retained ☐ The following types of data are available for download by the cloud user: ☐ Log data ☐ Other Log Data from VMs as well as diagnostic data from Azure Diagnostic API	Customers may extract and/or delete Customer Data at any time (Active Delete). Data will be deleted right away for services with no recycle bin function. Data will be retained to maximum 30 days for services support recycle bin function. Customers remain responsible for all storage and other applicable charges during this retention period. When a Subscription expires or terminates (Passive Delete), we will retain user data from minimum 90 days to maximum 180 days. On log data retention, this varies by type of log. Logs controlled by the user are retained maximum to 180 days.
5.	Data sovereignty	The primary data locations are: ☑ Singapore ☑ Asia Pacific ☐ Europe ☐ United States The backup data locations are: ☑ Singapore	Customers data will be stored in Singapore and other countries in Asia region (Hong Kong, Korea, Malaysia and Japan), this includes service logs that contain customer-authored data. Please find the details of Office 365 data centre locations here: https://docs.microsoft.com/en-us/microsoft-365/enterprise/0365-data-

			locations?ms.officeurl=datamaps &view=o365-worldwide
		☐ Europe	
		☐ United States	
		No. of countries in which data centres are operated: $\underline{8}$	Office 365 Trust Centre link: https://www.microsoft.com/en-us/trust-center
		The user's data stored in the cloud environment will never leave the locations specified in item 5:	
		Yes	
		Yes, except as required by law	
		Yes, except as noted: See <u>Trust Center</u> link for details	Office 365 Trust Center:
		□ No	https://www.microsoft.com/en-
		User's consent is required prior to transferring data to a location not specified in item 5 or a third party:	<u>us/trust-center</u>
		Yes	
		Yes, except as required by law	
		Yes, except as noted:	
		No Consent is obtained via service agreement and in privacy statement.	
		Note: Cloud users are responsible for determining the impact of data protection and data sovereignty laws on the locations where data is stored. In addition, users should understand the risks associated with relevant laws that may allow for law enforcement or other government access to data in-transit or storage with Cloud Service Providers.	
6.	Non- disclosure	Non-disclosure agreement template can be provided by Cloud Service Provider	Non-disclosure is addressed in the service agreement, which includes the following
		☐ Cloud Service Provider may use customer's NDA (pending legal review)	commitment:
			Microsoft will not disclose Customer Data to a third party (including law enforcement, other government entity, or civil litigant; excluding our subcontractors) except as Customer directs or

Provi	der Performance		unless required by law. Should a third party contact Microsoft with a demand for Customer Data, Microsoft will attempt to redirect the third party to request that data directly from Customer. As part of that, Microsoft may provide Customer's basic contact information to the third party. If compelled to disclose Customer Data to a third party, Microsoft will promptly notify Customer and provide a copy of the demand, unless legally prohibited from doing so.
7.	der Performance Availability	The committed network uptime is:	Minimum SLA for all Office 365 services in scope is 99.9%. Please find the details and conditions of SLAs for Office 365 services on Office 365 Trust Center: https://docs.microsoft.com/enus/office365/servicedescriptions/office-365-platform-servicedescription/service-levelagreement No single point of failure since the underlying infrastructure is distributed.
8.	3 [∞] party dependency	Highlight areas of critical dependency for service delivery: see side remarks	Microsoft leverages in-house developments and cloud infrastructures Azure provides.
9.	BCP / DR	 ☑ Disaster recovery protection ☑ Backup and restore service ☑ User selectable backup plans ☐ Escrow arrangements ☐ No BCP / DR is available ☐ RPO Managed by cloud user 	Microsoft does not provide escrow arrangements but will provide process for SLA service credit claims. Exchange (EXO)'s RTO is 60 minutes and RPO is 0. Skype for Business (SFB)' RTO is 180 minutes and RPO is 5 minutes.

		☐ RTO Managed by cloud user ☐ Others, please specify:	Sharepoint Online (SPO)'s RTO is 120 minutes and RPO is 60 minutes.
10.	Liability	The following terms are available for the users on failure of the provider to meet the service commitment: Network failure Liability: Infrastructure failure Liability: Same as network failure Virtual machine instance failure Liability: Same as network failure Migrations Liability: Unscheduled downtime Liability: Same as network failure Database failure Liability: Same as network failure Monitoring failure	Liability for outages is addressed in the Service Level Agreements, available here: https://docs.microsoft.com/en-us/office365/servicedescriptions/office-365-platform-service-description/service-health-and-continuity
		Liability: Same as network failure	
11.	Shared responsibility	Communication of shared roles & responsibilities for which CSC needs to implement and manage for use of this cloud service	Responsibility for SaaS: https://azure.microsoft.com/en-us/resources/shared-responsibilities-for-cloud-computing/
Service Support			
12.	Change management	The Cloud Service Provider has established the following for changes, migrations, downtime, and other potential interruptions to cloud services: Communication plan and procedures for	Assistance in migration to new services when legacy solutions are discontinued -
		proactive notification Assistance in migration to new services when legacy solutions are discontinued	SaaS: Will provide guidance for migration scenarios.

		☑ Ability to remain on old versions for a defined time period☑ Ability to choose timing of impact	
13.	Self-service provisioning and management portal	Provide self-service provisioning and management portal for users to manage cloud services: ☐ Yes ☐ No If yes, describe the functions of the self-service provisioning and management portal provided: ☐ Allow role-based access control (RBAC) ☐ Manage resource pools (e.g. VMs, storage, and network) and service templates ☐ Track and manage the lifecycle of each service ☐ Track consumption of services ☐ Others:	RBAC is implemented on Office 365.
14.	Incident and problem management	Delivery mode of support:	Please find the different support plans as follows: http://technet.microsoft.com/enus/library/office-365-support.aspx Customers have continuous access to their own virtual machines and other services. Auditing of workloads, vulnerability assessment and penetration testing within the Virtual Machines or for their own virtual machines is the customer's responsibility.

15.	Billing	 ☑ Incident management assistance Incident response time: Dependent on severity of incident and type of support plan; between 15 minutes – 8 hours Mean time to repair on detection of faults: The following billing modes are available (please elaborate granularity of charges and measurement): ☑ Pay per usage per hour (up to per user per hour/day/month/year for SaaS) ☐ Fixed pricing (up to yearly/monthly/daily) ☑ Other pricing model Enterprise Agreement for Azure 	Other pricing model: Office 365 has a monthly committed spend model which offers discounts to corporations based on the number of users. Additional information can be found: https://www.microsoft.com/en-us/microsoft-365/business/compare-all-microsoft-365-business-products?tab=2
		Not disclosed	Customers are able to see the
		Available billing history:Months	entire billing history since the subscription starts.
16.	Data portability	Importable VM formats: Not Applicable	Customers can extract their data
	portability	Downloadable formats: Separate data format	from Office 365 anytime, there is no VM associated.
		Supported operating systems: See side remarks	Exchange:
		Language versions of supported operating systems:	https://docs.microsoft.com/en- us/Exchange/recipients/mailbox- import-and-export/export-
		See side remarks	procedures?view=exchserver- 2019
		Supported database formats: See side remarks	Sharepoint: https://docs.microsoft.com/en-
		API:	us/sharepoint/administration/back
		☐ Common See side remarks	MS Teams:
		☐ Customised See side remarks	https://support.microsoft.com/en- us/office/export-or-delete-your-
		Upon service termination, data is available through:	<u>teams-data-1ed6ac68-5fb4-41be-9861-1a4127fecf68</u>
			Language Support:
		Standard methods as described above	https://www.microsoft.com/en-

		Other methods	us/microsoft- 365/business/international- availability
17.	Interoperabilit y	Use of industry standards and availability of APIs to support interoperability: I Transport supported (e.g. REST based HTTPS/MQTT): REST API Format supported (e.g. JSON/XML) APIs supported: Outlook API /OneNote API / Video API / Discovery API Other methods: Microsoft Graph	Guide available: https://learn.microsoft.com/en- us/previous- versions/office/office-365-api/ https://learn.microsoft.com/en- us/graph/overview
18.	Access	Type of access to the service is through: ⊠ Public access ⊠ Private access (e.g. VPN, dedicated link) □ IPv6 access is supported □ Other access methods ———————————————————————————————————	Microsoft Office 365 currently runs certain IPv6 services on Azure today. These services are constantly updated. Please contact Microsoft for the latest updates and roadmap, which is available under the terms of Microsoft's non-disclosure agreement.
19.	User management	 ☑ Identity management ☑ Role based access control ☑ Federated access model ☑ Integration with Identity management solutions ☐ Others 	For Office 365, Role Based Access Control (RBAC) is used to identify and control the access privileges of each service team's personnel. Customer can implement RBAC through the utilization of Active Directory (AD). AD is a Commercial Off The Shelf (COTS) directory service implemented by Microsoft for Windows domain networks. Office 365 MT uses Azure AD to implement Role Based Access Control (RBAC) via the use of AD groups. For the purposes of this control, the term "security group" references an Azure AD group which is used to enforce RBAC permissions.
20.	Lifecycle	The cloud user may select the following for service upgrades and changes:	

		☐ User customisable provisioning			
Secu	Security Configurations				
21.	Security configuration enforcement checks	Security configuration enforcement checks are performed:	Refer to the following link for more information: https://www.microsoft.com/securit		
		Using automated tools	y/blog/automation/		
		How often are enforcement being performed to ensure all security configurations are checks applied? External audits are done annually. Self-assessment is performed daily.			
22.	Multi tananay	☐ Distinct physical hosts			
22.	Multi-tenancy	☐ Distinct physical network infrastructure			
		 ☑ Virtual instance grouping 			
		User definable security domains			
		User customisable firewall			
		☐ User definable access policies			
23.	Hybrid cloud provision	Ability to monitor, track, apply and enforce CSC's security & privacy policies on its cloud workloads: Data protection and encryption key mgmt. enforcement geolocation-based/resource pools and secure migration of cloud workloads Key mgmt. and keystore controlled by CSC Persistent data flow segmentation before and after geolocation-based/resource pools secure migration Compliance enforcement for regulated workloads between on-premises private and hybrid/public cloud Others	Not applicable to Microsoft 365 as a SaaS service. The service supports Bring Your Own Key features and other mechanisms in terms of Key Management and Data protections. However, it is not defined as a Hybrid cloud model in SaaS. https://learn.microsoft.com/enus/microsoft-365/compliance/customer-key-manage?view=o365-worldwide		
Servi	ce Elasticity				
24.	Capacity elasticity	The following capacity elasticity options are available:	Minimum performance during peak periods – No.		
		☐ Programmatic interface to scale up or down			
		☐ Mean time to start and end new virtual instances			
		☐ Alerts to be sent for unusual high usage			

		Minimum performance during peak periods Minimum duration to scale up computing resources Minimum additional capacity guaranteed per account (number of cores and GB memory)	
25.	Network resiliency and elasticity	The following network resiliency and elasticity options are available: Redundant Internet connectivity links Redundant Internal connectivity Selectable bandwidth up toMbps Maximum usable IPs You can use any IP address range defined in RFC1918. That means the entire 10.0.0.0/8 (16,777,216 addresses) Load balancing ports Load balancing protocols Anti-DDOS protection systems or services Pefence-in-depth mechanisms, please specify: See side remarks Network traffic isolation, please specify: See side remarks Shared or dedicated bandwidth, please specify: Shared. Dedicated based on geographical availability. See side remarks. QoS traffic control services Alerts to be sent for unusual high usage Minimum performance during peak periods	Defence-in-depth mechanisms, please specify: https://docs.microsoft.com/en-us/azure/architecture/framework/security/design-network Microsoft Azure network security whitepaper: https://azure.microsoft.com/en-us/blog/microsoft-azure-network-security-whitepaper-version-3-is-now-available/
26.	Storage redundancy and elasticity	The following storage redundancy and elasticity options are available: Redundant storage connectivity links within each data centre Redundant storage connectivity links between data centres belonging to the same cloud	Office 365 Storage includes a "service" called Geo-Replication. It provides durability by constantly maintaining multiple healthy replicas of data both within and between data centres. For Exchange: https://docs.microsoft.com/en-

	Storage traffic isolation, please specify:	us/compliance/assurance/assura nce-exchange-data-resiliency
	Shared or dedicated storage network bandwidth, please specify:	For Sharepoint: https://docs.microsoft.com/en- us/compliance/assurance/assura nce-sharepoint-onedrive-data- resiliency
	· · · · · · · · · · · · · · · · · · ·	With geo-replication, Azure Storage keeps data durable in two locations. It replicates customer data hundreds of miles between two locations (i.e. between North and South US, between North and West Europe, and between East and Southeast Asia) to provide disaster recovery in case of regional disasters. Also the geo-replication information from one data centre to another as following: http://blogs.msdn.com/b/windowsazurestorage/archive/2011/09/15/introducing-geo-replication-for-windows-azure-storage.aspx Billing alert enables customer to get proactive email notifications when the bill goes above a certain monetary threshold that customer configures.
	☐ Minimum period to scale up storage I / O throughput	