



Dutch National Bank

Decree on Prudential Rule for Financial Undertakings

Google Workspace Mapping

This document is designed to help financial undertakings (“**regulated entity**”) supervised by the Dutch National Bank (“**DNB**”) to consider [Decree on Prudential Rule for Financial Undertakings](#) (“**framework**”) in the context of Google Workspace and the Google Cloud Financial Services Contract.

We focus on Chapter 5 - Outsourcing of Activities, Sections 30 and 31, of the framework. For each paragraph, we provide commentary to help you understand how you can address the requirements using the Google Cloud services and the Google Cloud Financial Services Contract.

#	Framework reference	Google Cloud commentary	Google Cloud Financial Services Contract reference
1.	Section 30		
2.	A payment institution, a clearing institution, an electronic money institution, a bank, a credit union, premium pension institution, insurer with limited risk exposure, a currency exchange institution or branch as referred to in Section 27(2) , has adequate procedures, measures, expertise and information to be able to assess the performance of the outsourced activities on a structural basis.	<p><u>Performance monitoring</u></p> <p>You can monitor Google’s performance of the Services (including the SLAs) on a regular basis using the functionality of the Services.</p> <p>For example:</p> <ul style="list-style-type: none"> • The Status Dashboard provides status information on the Services. • Admin Console Reports allow you to examine potential security risks, measure user collaboration, track who signs in and when, analyze administrator activity, and much more. • Access Transparency is a feature that enables you to review logs of actions taken by Google personnel regarding your user content. Log entries include: the affected resource, the time of action, the reason for the action (e.g. the case number associated with the support request); and data about who is acting on data (e.g. the Google personnel’s location). <p>Google will make information about developments that materially impact Google’s ability to perform the Services in accordance with the SLAs available to you. More information is available on our Status Dashboard page.</p> <p>In addition, Google will notify you of data incidents promptly and without undue delay. More information on Google’s data incident response process is available in our Data incident response whitepaper.</p> <p><u>Audit reports</u></p> <p>Google recognizes that regulated entities need to review our internal controls as part of their risk assessment. To assist, Google undergoes several independent third-party audits on at least an annual basis to provide independent verification of our operations</p>	<p>Ongoing Performance Monitoring</p> <p>Significant Developments</p> <p>Data Incidents (Data Processing Amendment)</p> <p>Certifications and Audit Reports</p>



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		<p>and internal controls. Google commits to comply with the following key international standards during the term of our contract with you:</p> <ul style="list-style-type: none"> • ISO/IEC 27001:2013 (Information Security Management Systems) • ISO/IEC 27017:2015 (Cloud Security) • ISO/IEC 27018:2014 (Cloud Privacy) • SOC 1 • SOC 2 • SOC 3 <p>You can review Google's current certifications and audit reports at any time.</p> <p><u>Expertise</u></p> <p>Google provides documentation to explain how regulated entities and their employees can use our Google Workspace services. If a regulated entity would like more guided training, Google also provides a variety of courses and certifications.</p>	N/A
3.	Section 31		
4.	1 A payment institution, a clearing institution, an electronic money institution, a bank, a credit union, a premium pension institution, an insurer with limited risk exposure, a currency exchange institution or branch as referred to in Section 27(2) , records in writing the agreement with the third party to whom the activities are being outsourced on a structural basis.	The Google Cloud Financial Services Contract is the written contract between the parties.	N/A
5.	2 The agreement shall in any case include the following:		
6.	a. the mutual exchange of information, including agreements on the provision of information requested by the supervisory authorities in the performance of their statutory duties;	Google grants audit, access and information rights to regulated entities, supervisory authorities and both their appointees. Regulated entities may access their data on the services at any time and may provide their supervisory authority with access.	Regulator Information, Audit and Access Customer Information, Audit and Access
7.	b. the possibility for the financial undertaking or the branch office to make changes at any time in the manner in which the activities are carried out by the third party;	<p>You decide which services to use, how to use them and for what purpose. Therefore you stay in control of the relevant activities and can make changes to your use of the Services at any time.</p> <p>Regulated entities can use the following functionality to control the Services:</p>	Instructions



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		<ul style="list-style-type: none"> Admin Console: A web-based graphical user interface that customers can use to manage their Google Workspace resources. 	
8.	c. the obligation for the third party to enable the financial undertaking or the branch office to continue to comply with the provisions laid down by or pursuant to the law; and	<p>Google will comply with all laws and regulations applicable to it in the provision of the Services.</p> <p>In addition, Google recognizes that using our Services should not impair the regulated entity's (or their supervisory authority's) ability to oversee and supervise compliance with applicable laws and regulations. We will provide regulated entities with the assistance they need to review our Services.</p>	<p>Representations and Warranties</p> <p>Enabling Customer Compliance</p>
9.	d. the possibility for the supervisory authorities to carry out an on-site investigation or to have such investigation carried out by a third party; and	<p>Google grants audit, access and information rights to supervisory authorities and their appointees. This includes access to Google's premises used to provide the Services to conduct and on-site audit.</p>	Regulator Information, Audit and Access
10.	e. the manner in which the agreement is terminated, and the manner in which it is ensured that the financial undertaking or the branch office can perform the activities itself again after termination of the agreement or have such activities performed by another third party.	<p><u>Termination</u></p> <p>Regulated entities can elect to terminate our contract for convenience with advance notice, including if necessary to comply with law or if directed by a supervisory authority.</p> <p>In addition, regulated entities may terminate our contract with advance notice for Google's material breach after a cure period, for change in control or for Google's insolvency.</p> <p><u>Transfer</u></p> <p>Google recognizes that regulated entities need sufficient time to exit our services (including to transfer services to another service provider). To help regulated entities achieve this, upon request, Google will continue to provide the services for 12 months beyond the expiry or termination of the contract.</p> <p>Google will enable you to access and export your data throughout the duration of our contract and the transition term. More information is available on our Google Account help page.</p>	<p>Term and Termination</p> <p>Transition Term</p> <p>Data Export (Data Processing Amendment)</p>



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		In addition, Data Export is a feature that makes it easy to export and download a copy of your data securely from our Services.	
11.	3 The supervisory authorities shall only exercise the option referred to in Subsection (2)(d) if it cannot be determined in any other way that the provisions laid down by or pursuant to the law are complied with in respect of the outsourced activities.	<p>Google recognizes that you expect independent verification of our security, privacy and compliance controls. Google undergoes several independent third-party audits on at least an annual basis to provide independent verification of our operations and internal controls. Refer to Row 2 for more information on the certifications and audit reports that Google maintains. You can review Google's current certifications and audit reports at any time.</p> <p>Although we will make a lot of information and tools available to help regulated entities review our Services, our contract does not contain predefined steps before regulated entities or supervisory authorities can approach Google to exercise their information, audit and access rights. In other words, there is no hierarchy amongst the options for assessing our Services.</p>	<p>Certifications and Audit Reports</p> <p>Regulator Information, Audit and Access Customer Information, Audit and Access</p>