



Korean FSC - IT Outsourcing Regulations

Google Cloud Platform Mapping

This document is designed to help institutions supervised by the Korean Financial Services Commission (“**regulated entity**”) to consider the [Regulation on Outsourcing of Information Processing Business of Financial Institutions](#) (the “**framework**”) in the context of Google Cloud Platform (“**GCP**”) and the Google Cloud Financial Services Contract.

We focus on appendix 3 (outsourcing operation standards) 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.	Regulated entities shall establish and operate outsourcing operation standards based on the following:		
2.	1. Risk assessment and management measures for outsourcing	<p>Google recognizes that you need to conduct due diligence and perform a risk assessment before deciding to use our services. To assist you, we’ve provided information for some of the areas you may need to consider below.</p> <ul style="list-style-type: none"> • Qualifications and competencies: Google Cloud has been named as a leader in several reports by third party industry analysts. You can read these on our Analyst Reports page. • Customer references: Information about our referenceable customers (including in the financial services sector) is available on our Google Cloud Customer page. • Principals: Information about Google Cloud’s leadership team is available on our Media Resources page. <p>We also recognize that you expect independent verification of our security, privacy and compliance controls. Google undergoes several independent third-party audits on a regular basis to provide this assurance. 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) • PCI DSS • SOC 1 • SOC 2 <p>You can review Google’s current certifications and audit reports at any time.</p>	<p>N/A</p> <p>Certifications and Audit Reports</p>
3.	2. Termination and subcontracting of outsourcing contracts	<p><u>Termination</u></p> <p>You 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><u>Subcontracting</u></p> <p>To enable regulated entities to retain oversight of any subcontracting and provide choices about the services regulated entities use, Google will:</p>	<p>Termination for Convenience</p> <p>Google Subcontractors</p>



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Google Cloud Platform Mapping

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		<ul style="list-style-type: none"> provide information about our subcontractors; provide advance notice of changes to our subcontractors; and give regulated entities the ability to terminate if they have concerns about a new subcontractor. <p>Google will oversee the performance of all subcontracted obligations and ensure our subcontractors comply with our contract with you (including the audit and access rights, and security requirements).</p>	
4.	3. Monitoring of outsourced task		
5.	Monitoring procedures for major issues related to outsourcing (service provider's financial status and risks, emergency plans and results, etc.), appointment of monitoring staff, and reporting system for management.	<p><u>Service delivery</u></p> <p>You can monitor Google's performance of the Services (including the SLAs) on an ongoing 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. Google Cloud Operations is an integrated monitoring, logging, and diagnostics hosted solution that helps you gain insight into your applications that run on GCP. Access Transparency is a feature that enables you to review logs of actions taken by Google personnel regarding your data. 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><u>Risks and emergencies</u></p> <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 Incidents & the Google Cloud 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>Google's financial status</u></p>	<p>Ongoing Performance Monitoring</p> <p>Significant Developments</p> <p>Data Incidents (Data Processing and Security Terms)</p>



Korean FSC - IT Outsourcing Regulations

Google Cloud Platform Mapping

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		You can review information about Google's financial status on Alphabet's Investor Relations page.	
6.	4. Protection of customer data		
7.	Management of customer data;	<p>Google commits to only access or use your data to provide the services ordered by you and will not use it for any other Google products, services, or advertising.</p> <p>You can provide Google instructions about your data and Google will comply with those instructions. Regulated entities can use the following functionality to provide instructions to Google about the Services:</p> <ul style="list-style-type: none"> • Cloud Console: A web-based graphical user interface that customers can use to manage their GCP resources. • gcloud Command Tool: A tool that provides the primary command-line interface to GCP. A command-line interface is a user interface to a computer's operating system. • Google APIs: Application programming interfaces which provide access to GCP. <p>For more information about managing the security of customer data refer to Row 20.</p>	<p>Protection of Customer Data</p> <p>Google's Compliance with Instructions (Data Processing and Security Terms)</p>
8.	Granting access only to authorized persons; and	<p>Google recognizes that you need visibility into who did what, when, and where for all user activity on our service.</p> <ul style="list-style-type: none"> • Cloud Identity and Access Management helps to prevent against unauthorized access by controlling access rights and roles for Google Cloud Platform resources. • Cloud Audit Logs help your security teams maintain audit trails in GCP and view detailed information about Admin activity, data access, and system events. <p>The "Managing Google's Access to your Data" section of our Trusting your data with GCP whitepaper explains Google's data access processes and policies.</p> <p>In addition, you can also monitor and control the limited actions performed by Google personnel on your data using these tools:</p> <ul style="list-style-type: none"> • Access Transparency is a feature that enables you to review logs of actions taken by Google personnel regarding your data. Log entries include: the affected resource, the time of action, the reason for the action (e.g. the case 	N/A



Korean FSC - IT Outsourcing Regulations

Google Cloud Platform Mapping

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		<p>number associated with the support request); and data about who is acting on data (e.g. the Google personnel's location).</p> <ul style="list-style-type: none"> Access Approval is a feature that enables you to require your explicit approval before Google support and engineering teams are permitted access to your customer content. Access Approval provides an additional layer of control on top of the transparency provided by Access Transparency. 	
9.	Right to take action by customers in case of violation of confidentiality protection	Regulated entities may terminate our contract with advance notice for Google's material breach after a cure period.	Term and Termination
10.	5. Emergency plan		
11.	In case of contingency such as bankruptcy of service provider or communication problem	<p>Google will implement a disaster recovery and business contingency plan for our services, review and test it at least annually and ensure it remains current with industry standards. Regulated entities can review our plan and testing results.</p> <p>Information about how customers can use our Services in their own contingency planning is available in our Disaster Recovery Planning Guide.</p> <p>In particular, as part of your contingency planning, you can choose to use Anthos build, deploy and optimize your applications in both cloud and on-premises environments. Anthos provides a platform to develop, secure and manage applications across hybrid and multi-cloud environments.</p>	Business Continuity and Disaster Recovery
12.	6. Securing access to outsourcing information		
13.	Ensure access to data by supervisory authorities or internal and external auditors	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
14.	7. A financial institution's outsourcing agreement shall specify the following:		
15.	<ul style="list-style-type: none"> The scope of outsourcing (provision cycle, contents and method), means of doing task 	The GCP services are described on our services summary page . You decide which services to use, how to use them and for what purpose. Therefore, you decide the scope of the arrangement.	Definitions
16.	<ul style="list-style-type: none"> Provision of information (including key business information for service providers) 	Refer to Row 5 for the information that we make available to you.	N/A



Korean FSC - IT Outsourcing Regulations

Google Cloud Platform Mapping

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17.	<ul style="list-style-type: none"> Audit on service provider 	<p>Refer to Row 1 for more information on the independent audits that Google undergoes for the Services</p> <p>In addition, Google recognizes that regulated entities must be able to audit our services effectively. Google grants audit, access and information rights to regulated entities and both their appointees.</p>	Customer Information, Audit and Access
18.	<ul style="list-style-type: none"> Fees and compensation for outsourcing 	Refer to your Google Cloud Financial Services Contract.	Payment Terms
19.	<ul style="list-style-type: none"> Regulated entities' ownership of outsourced data, Use of financial companies' physical facilities and intellectual property rights 	<p><u>Outsourced data and intellectual property.</u></p> <p>You retain all intellectual property rights in your data, the data you derive from your data using our services and your applications.</p> <p><u>Physical facilities</u></p> <p>Google doesn't make use of your physical facilities to deliver our services.</p>	<p>Intellectual Property</p> <p>N/A</p>
20.	<ul style="list-style-type: none"> Protection and confidentiality of customer data 	<p>The security and confidentiality of information when using a cloud service consists of two key elements:</p> <p><u>(1) Google's infrastructure</u></p> <p>Google manages the security of our infrastructure. This is the security of the hardware, software, networking and facilities that support the Services.</p> <p>Given the one-to-many nature of our service, Google provides the same robust security for all our customers.</p> <p>Google provides detailed information to customers about our security practices so that customers can understand them and consider them as part of their own risk analysis.</p> <p>More information is available at:</p> <ul style="list-style-type: none"> Our infrastructure security page Our security whitepaper Our cloud-native security whitepaper Our infrastructure security design overview page Our security resources page <p><u>(2) Your data and applications in the cloud</u></p>	Data Security; Security Measures (Data Processing and Security Terms)



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Google Cloud Platform Mapping

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		<p>You define the security of your data and applications in the cloud. This refers to the security measures that you choose to implement and operate when you use the Services.</p> <p>(a) <u>Security by default</u></p> <p>Although we want to offer you as much choice as possible when it comes to your data, the security of your data is of paramount importance to Google and we take the following proactive steps to assist you:</p> <ul style="list-style-type: none"> • Encryption at rest. Google encrypts customer data stored at rest by default, with no additional action required from you. More information is available at: https://cloud.google.com/security/encryption-at-rest/default-encryption. • Encryption in transit. Google encrypts and authenticates all data in transit at one or more network layers when data moves outside physical boundaries not controlled by Google or on behalf of Google. More information is available at https://cloud.google.com/security/encryption-in-transit. <p>(b) <u>Security products</u></p> <p>In addition to the other tools and practices available to you outside Google, you can choose to use tools provided by Google to enhance and monitor the security of your data. Information on Google's security products is available on our Cloud Security Products page.</p> <p>(c) <u>Security resources</u></p> <p>Google also publishes guidance on:</p> <ul style="list-style-type: none"> • Security best practices • Security use cases 	
21.	<ul style="list-style-type: none"> • Emergency plans such as securing a backup system to ensure business continuity 	<p>Refer to Row 11 for information about Google's business continuity plans and how customers can use our Services in their own business continuity planning.</p> <p>In addition, regulated entities can use Cloud Storage as part of their backup routine. Refer to our Disaster Recovery Building Blocks and Disaster Recovery Scenarios for Data articles for more information about how you can use the services for data backup.</p>	N/A



Korean FSC - IT Outsourcing Regulations

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22.	<ul style="list-style-type: none"> Indemnification, insurance, dispute resolution (mediation, arbitration, etc.) 	<p><u>Indemnification</u></p> <p>Refer to your Google Cloud Financial Services Contract.</p> <p><u>Insurance</u></p> <p>Google will maintain insurance cover against a number of identified risks.</p> <p><u>Dispute Resolution</u></p> <p>Refer to your Google Cloud Financial Services Contract.</p>	<p>Indemnification</p> <p>Insurance</p> <p>Governing Law</p>
23.	<ul style="list-style-type: none"> Service Provider Liability Limitations 	<p>Refer to your Google Cloud Financial Services Contract.</p>	<p>Liability</p>
24.	<ul style="list-style-type: none"> Termination of contract (regulated entities' right to terminate the contract, return of data, etc.) 	<p><u>Termination</u></p> <p>You 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>Return of data</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 during the post-termination transition term. You can export your data from the Services in a number of industry standard formats. For example:</p> <ul style="list-style-type: none"> Google Kubernetes Engine is a managed, production-ready environment that allows portability across different clouds as well as on premises environments. Migrate for Anthos allows you to move and convert workloads directly into containers in Google Kubernetes Engine. 	<p>Term and Termination</p> <p>Transition Term</p> <p>Data Export (Data Processing and Security Terms)</p>



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		<ul style="list-style-type: none">You can export/import an entire VM image in the form of a .tar archive. Find more information on images and storage options on our Compute Engine Documentation page. <p><u>Deletion</u></p> <p>On termination of the contractual relationship, Google will comply with your instruction to delete Customer Data from Google systems. For more information about deletion refer to our Deletion on Google Cloud Platform whitepaper.</p>	Deletion on Termination (Data Processing and Security Terms)
25.	<ul style="list-style-type: none">Audits by supervisory authority	Google grants audit, access and information rights to regulated entities and supervisory authorities, and both their appointees.	Regulator Information, Audit and Access
26.	<ul style="list-style-type: none">Service provider's joint liability for damages caused by subcontracting	Google requires our subcontractors to meet the same high standards that we do. In particular, Google requires our subcontractors to comply with our contract with you and will remain liable to you for any subcontracted obligations.	Subcontracting; Google Subcontractors
27.	<ul style="list-style-type: none">Service provider's responsibility for subcontracting	Google will remain responsible for the performance of all subcontracted obligations. Refer to Row 3 for the conditions that Google will comply with for subcontracting.	Google Subcontractors
28.	<ul style="list-style-type: none">Governing law and competent court (if the service provider is located in a foreign country)	Refer to your Google Cloud Financial Services Contract.	Governing Law