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Framework / Cloud Security / Other

SecNumCloud – Prestataires de services d'informatique en nuage – référentiel d'exigences v3.2 (ANSSI, 8 March 2022)

SecNumCloud is ANSSI's qualification for cloud providers meeting its référentiel d'exigences v3.2 (8 March 2022), including protection against non-European law.



What it is

SecNumCloud is the ANSSI qualification for cloud service providers (IaaS, CaaS, PaaS and SaaS) whose offers meet the agency's requirements baseline, Prestataires de services d'informatique en nuage – référentiel d'exigences, version 3.2 of 8 March 2022. It is voluntary for providers, but it is the level the French State recommends for hosting sensitive data and processing, and qualified offers carry an ANSSI security visa.

ANSSI created the référentiel in 2016 (version 3.0 of 8 December 2016 was the first applicable version). Version 3.2 added the criteria that protect customers against non-European law: a provider established in the European Union, caps on non-EU shareholdings, and no technical ability for non-EU third parties to reach customer data (chapter 19.6). A qualification is valid for three years, is followed by annual surveillance audits and can be renewed.

At a glance

PUBLISHER
Agence nationale de la sécurité des systèmes d'information (ANSSI)

TYPE
Certification / Assurance Program

VERSION
Référentiel d'exigences v3.2 (8 March 2022)

EFFECTIVE
March 8, 2022 (v3.2); first applicable version 3.0 on December 8, 2016

DOMAIN
Cloud Security

FAMILY
Other

REGION
France

INDUSTRY
Cloud & Technology Providers

ADOPTION MODEL
Certification

IMPLEMENTATION COMPLEXITY
High

Source: cyber.gouv.fr/enjeux-technologiques/cloud/

Why it matters

- **Resistance to extraterritorial law** Chapter 19.6 requires an EU head office and central administration, non-EU holdings of no more than 24 percent individually and 39 percent collectively, and no non-EU veto or board majority.
- **A defined threat model** ANSSI states the qualification is designed to resist isolated or hacktivist threats, capable cybercriminals and injunctions based on extraterritorial law, and to protect sensitive data.
- **Hygiene at the reinforced level** Requirement 5.1 b) obliges the provider to apply the ANSSI IT hygiene guide at its reinforced level to the service's information system.
- **Continuous assurance** Qualification lasts three years with annual surveillance audits, and version 3.2 introduced penetration testing throughout the qualification lifecycle.

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How SmartSuite supports SecNumCloud

Qualification Scope Record

Record the SaaS, PaaS, CaaS or IaaS services in scope, the evaluation center, the qualification date, the three-year expiry and each annual surveillance audit.

Requirement Library (chapters 5 to 19)

Hold each requirement with its chapter number, owner, implementation status, evidence links and the ISO/IEC 27001 Annex A control it shares.

Chapter 19.6 Ownership and Supplier Register

Track shareholdings, governance rights, the EU establishment facts and every supplier's ability to reach customer data, with the one-month customer notification log.

Risk Assessment Workflow

Run the chapter 5.3 risk assessment, record treatment decisions and approvals, and link residual risks to the service agreement.

Penetration Test and Compliance Review Tracker

Schedule lifecycle penetration tests, major change reviews (18.2.3) and technical conformity checks (18.4), with findings and closure.

Reversibility and Localization Evidence

Keep the data localization, regionalization and end-of-contract commitments of chapters 19.2 to 19.4 with the evidence that supports each customer contract.

Common framework mappings

CSA CCM v4 · CSA STAR · ISO 27001:2022 · ISO 27002:2022 · ISO 27017 · ISO 27018 · ISO 27701 · SOC 2

Official resources

SecNumCloud Certification Framework

Provides detailed requirements and guidelines for cloud security under the SecNumCloud certification by ANSSI.

cyber.gouv.fr/enjeux-technologiques/cloud

CCN-STIC 800 series — ENS guides

The CCN-CERT catalog of 800-series guides that develop the Esquema Nacional de Seguridad.

ccn-cert.cni.es/es/series-ccn-stic/guias/series-ccn-stic/800-guia-esquema-nacional-de-seguridad.html

Frequently asked questions

Is SecNumCloud a certification or a qualification?

A qualification. ANSSI qualifies a provider under its trusted service provider process after assessment by a licensed evaluation center, and qualified offers receive an ANSSI security visa (chapter 3.1). The qualification is valid for three years, followed by annual surveillance audits, and can be renewed.

Which cloud services can be qualified?

Chapter 2 covers four activities: SaaS, PaaS, CaaS and IaaS. The provider chooses its scope from these activities and must meet every requirement on that scope (chapter 3.2). Services outside the assessed scope cannot claim the qualification.

What does chapter 19.6 require about non-European law?

The provider's registered office, central administration and principal establishment must be in the European Union; non-EU entities may hold no more than 24 percent of capital or voting rights individually and 39 percent collectively, with no veto or board majority; non-EU suppliers must have no technical ability to reach customer or technical data; and the customer must be told within one month of any change affecting these conditions.

Is SecNumCloud mandatory?

Not for providers in general. It is the level ANSSI recommends for hosting sensitive information systems in its 2024 recommendations under the State's 2021 cloud doctrine, and the HDS health-data référentiel accepts a SecNumCloud 3.2 qualification as proof against third-country access. Customers with regulated data still need complementary requirements set through a homologation (chapter 3.3.2).

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How does SecNumCloud relate to EUCS and ISO/IEC 27001?

The référentiel reuses the ISO/IEC 27001 Annex A structure and adds its own requirements, so providers usually hold both. ANSSI has carried the SecNumCloud criteria into the European cloud certification scheme (EUCS) under the 2019 Cybersecurity Act, which ANSSI states is not yet finalized.

License included / downloadable: Yes The référentiel d'exigences v3.2 and its English requirements baseline are published by ANSSI on cyber.gouv.fr; qualification assessments are paid services from licensed evaluation centers.

Full framework page and mappings: smartsuite.com/frameworks/france-secnumcloud-anssi-cloud-security-certification

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