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General Manager, Policy Development
Policy and Advice Division
Australian Prudential Regulation Authority

Submitted via email: PolicyDevelopment@apra.gov.au

Re: Consultation on Prudential Practice Guide CPG 234 Information Security

Amazon Web Services, Inc. (“**AWS**”) is pleased to submit the following comment to the Australian Prudential Regulation Authority (“**APRA**”) in respect of draft Prudential Practice Guide CPG 234 Information Security (“**Draft CPG 234**”).

AWS has reviewed the Draft CPG 234 and we have identified one area that we believe would benefit from further clarification by APRA. We request a clarification be added to paragraphs 84 to 86 (Notification) of the draft CPG 234. This clarification should reiterate that paragraphs 35 to 36 of Prudential Standard CPS 234 Information Security (“**CPS 234**”) do not require the APRA-regulated entity to impose additional contractual obligations on an outsourcing service provider beyond those already required by Prudential Standard CPS 231 Outsourcing (“**CPS 231**”). We believe this is consistent with APRA’s intent per footnote 14 of CPS 234.

Without this clarification, we anticipate that APRA-regulated entities may seek contractual commitments from outsourcing service providers that exceed the requirements of CPS 231 and go beyond the abilities of those providers (which will directly impact the ability of regulated entities to adopt outsourcing services like public cloud). We believe this clarification will reinforce the intent of CPS 234 for regulated entities to focus on their information security processes and procedures to ensure that financial promises to beneficiaries will be met.

If there is further information or clarification that we can provide to you in respect of this submission please do not hesitate to contact me at [REDACTED].

Sincerely,

[REDACTED]

Simon Edwards
Head of Public Policy Australia & New Zealand
Amazon Web Services