

From: [Regis MARTIN](#)
To: [Comments, Public](#)
Cc: [Dawn PAPCIAK](#)
Subject: FW: FINRA Cloud Report
Date: Thursday, August 19, 2021 7:13:54 AM

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Good morning Jennifer,

Michael suggested that I post the below as a comment of the new Cloud Report.
For the next iteration of this document or for question/attention.

During contract negotiation it happens to be impossible to protect the firm for data privacy or data protection when it comes to cloud providers' sub-processors.
Most public cloud providers refuse to go against the general terms and conditions and only offer to inform clients (at best) of the sub-processors they will use.
According to most terms and conditions, the sub-processors can store or process our data; and we are, at best, informed but without having the possibility to consent, prevent or control the sub-processor and can only terminate the service impacted.
It would be interesting to receive feedback from member firms, having a mature or strong Third Party or Forth Party Risk management program on how they deal with this issue.

Best,
Regis

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Urgent matters require a direct phone call

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