

# FOGHORN WHITEPAPER SERIES

A Resource Guide For Navigating The Cloud



# Secure, Performant IaaS on AWS for Financial Service Organizations.

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In this whitepaper you will find out:

- > **Cloud compliance for FSOs**
- > **Banking on DevOps**
- > **Data regions and residency**
- > **CapEx to OpEx cost savings**
- > **Performance enhancements**
- > **Lowering cost, while raising performance**



Mission critical, CI/CD  
workloads realize  
compliance and innovation  
velocity on AWS



# INTRODUCTION

Traditionally Financial Service Organizations (FSOs) have been digital pioneers driving technology further faster. From the ATM to mobile banking, banks have led the charge to a more connected, technology driven world. Ironically it is this early adoption of IT that has resulted in a modern reliance on outdated mainframes and inherited legacy technology that has acted as a speed bump, slowing financial firms adoption of cloud.

Traditionally the victor of the IT performance race was the company with the most resources. To gain advantage over the competition banks, insurance, mortgage enterprises could purchase the latest and greatest hardware. Just ten years ago they could invest more and more in their dedicated compute environments and out muscle and out innovate the competition with their mere might. With the ascendancy of cloud technology, agile toolkits on AWS, and pay-as-you-go opex, barriers to entry have been obliterated and the disruptors can be seen to have an advantage, unburdened of legacy applications and infrastructure.

Perhaps it is the use of "cloud" as a metaphor that is partly responsible for a lack of confidence with storing mission critical data in the "cloud." A 2012 survey of 1,000 random people noted that 51% believed that weather impacted cloud computing, and 29% believed that cloud computing was actually in the clouds. <sup>1</sup> With banks, whose survival and growth depend on the reality and perceptions of the level of security they practice, the marketing department would be correct in advocating louder than anyone for an in-house approach to data storage and production workloads.

Due to the sanctity and value of financial services customer's data and the amount of cyber criminals eager to get the data, a measured approach has been prudent. In regards to "the Cloud" financial regulators and policy makers did not always have a framework for analysis. With the proven, secure, performant and cost effective cloud of today, old perceptions are permanently in the past.

74% of companies are already running workloads on the public cloud or utilizing hybrid architecture.<sup>2</sup> The financial services sector is one of the fastest growing verticals in the public cloud ecosystem and producing truly remarkable innovation leaps as a result.<sup>3</sup> Amazon Web Services's Cloud can be delivered with 99.999% uptime Service Level Agreement guarantees and provide highly available, geographically diverse, elastic architecture which can transform the IT department from a sunk cost to a springboard for innovation, disrupting the market and giving customers what they demand before they know they needed it.

**While the risks of the cloud may have been too high for the finserve CTO and CIO five years ago, the benefits of NOT moving to the cloud today are too risky to ignore.**



While the risks of the cloud may have been too high for the finserve CTO and CIO five years ago, the benefits of not moving to the cloud today are too risky to ignore. In the ever evolving world of mobile and online services customer needs and expectations are driving innovation towards a more connected, responsive and intuitive future thanks to the cloud.

This whitepaper will explore the opportunities that financial service companies can realize by migrating to market leader AWS. We will bring into clearer focus these benefits, through the lens of security, architecture, performance, software development and cost savings.

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<sup>1</sup> Citrix Survey 2012

<sup>2</sup> Forbes, 2017 State of Cloud Adoption

<sup>3</sup> McKinsey & Company, 2018 Cloud Adoption to Accelerate IT modernization

# CLOUD SECURITY AND COMPLIANCE

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**In the public cloud of 2019, the regulators have caught up with cloud technology, and cloud providers have kept pace with the changing regulatory landscape. Whether your organization needs compliance such as PCI, SOC 1, SOC 2, FISMA, or FFIEC the cloud is now the fastest path to compliance. With documentation, change control, encryption and geographic diversity the cloud offers exciting elasticity and scalability that give peace of mind to FSOs, customers and regulators simultaneously.**

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## Change Management

Traditionally, the most trusted method of ensuring security and availability of customer data was to implement tightly controlled and documented change control processes. This ensured that nothing could slip into production without severe scrutiny. Within a traditional IT environment, these processes could often slow innovation to a halt. Even the smallest change could take weeks and often months to get approval. Unaddressed this practice can act as a speedbump and eliminate any advantage to moving to cloud infrastructure.

In order to eliminate this bottleneck to innovation in the cloud, change control must be transformed without compromising regulatory compliance. In order to accomplish this, change control must be re-imagined with cloud infrastructure in mind. One of the main benefits of change control is to ensure changes are known, documented, and auditable.

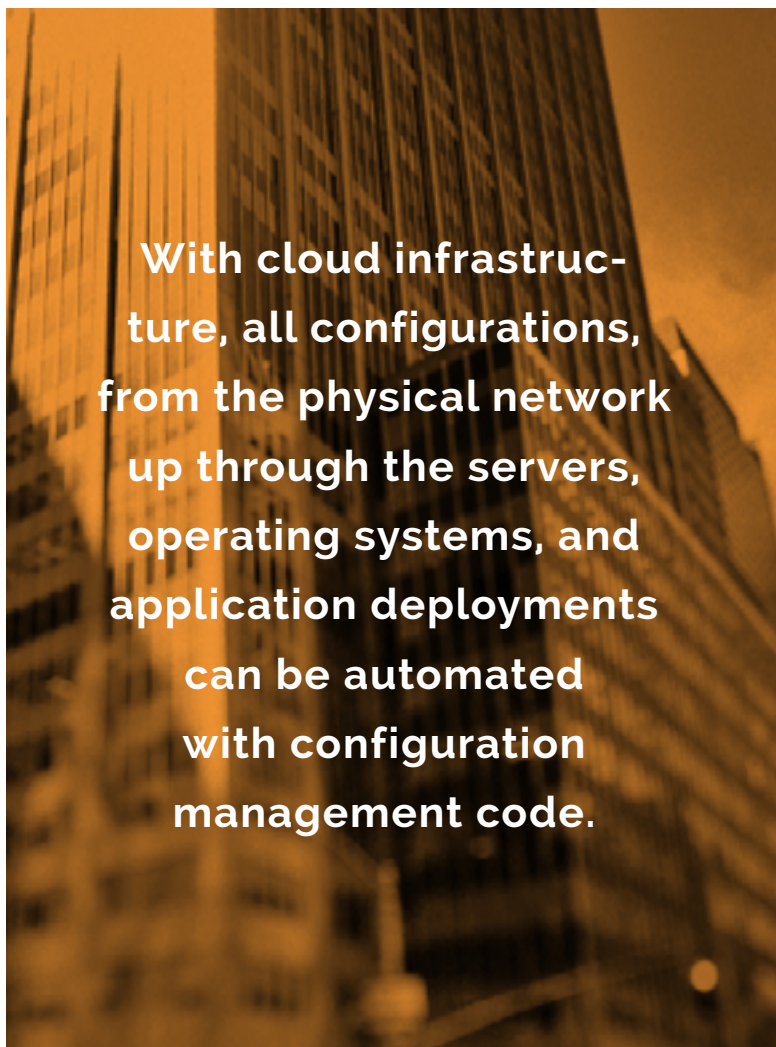
With cloud infrastructure, all configurations, from the physical network up through the servers, operating systems, and application deployments can be automated with config-



uration management code. By building infrastructure deployment pipelines and limiting cloud access to those pipelines, configuration management on AWS provides accuracy and enhances agility.

**AWS Config** allows for the assessment, auditing and configuration of resources deployed on AWS. The management and automation of transition architectures and their incremental production releases on their journey from current to target state is ideal for compliance auditing, security analysis, change management, and operational troubleshooting.

Holistic security testing must be central to deployment pipelines. The job of the pipeline is to ensure confidence in the software release or infrastructure change. Confidence in your security is not negotiable. AWS has robust tools to facilitate and automate testing outside of production, and with on demand infrastructure resources.



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### **Data Sovereignty**

Compliance with certain countries may dictate that data cannot leave the borders. For example the Canadian Personal Information Protection and Electronic Documents Act (PIPEDA) dictates that banking and other regulated industries keep their data within Canadian borders. For companies operating in the USA and Canada under this regulation the alternative to spinning up a separate cloud ecosystem was to build capital intensive colocation or data centers north and south of the Canada/USA border.

Hyperscale AWS has built granular controls to establish regions and residency of customer data, meaning the encrypted data never leaves the borders of that specific country or group of countries. Regulators expect financial services institutions to build safeguards and protections in the architecture. Just as with on premise data centers, data in the cloud must be protected with firewalls and encryption to keep data from hackers grasp.

AWS partnership with their customers is built upon a shared responsibility model. While 100% of the infrastructure and the physical security layer are within the responsibility of the cloud provider, 100% of the responsibility of compliance of the system as a whole remain the responsibility of the financial institution.

### AWS and Customer's Responsibilities

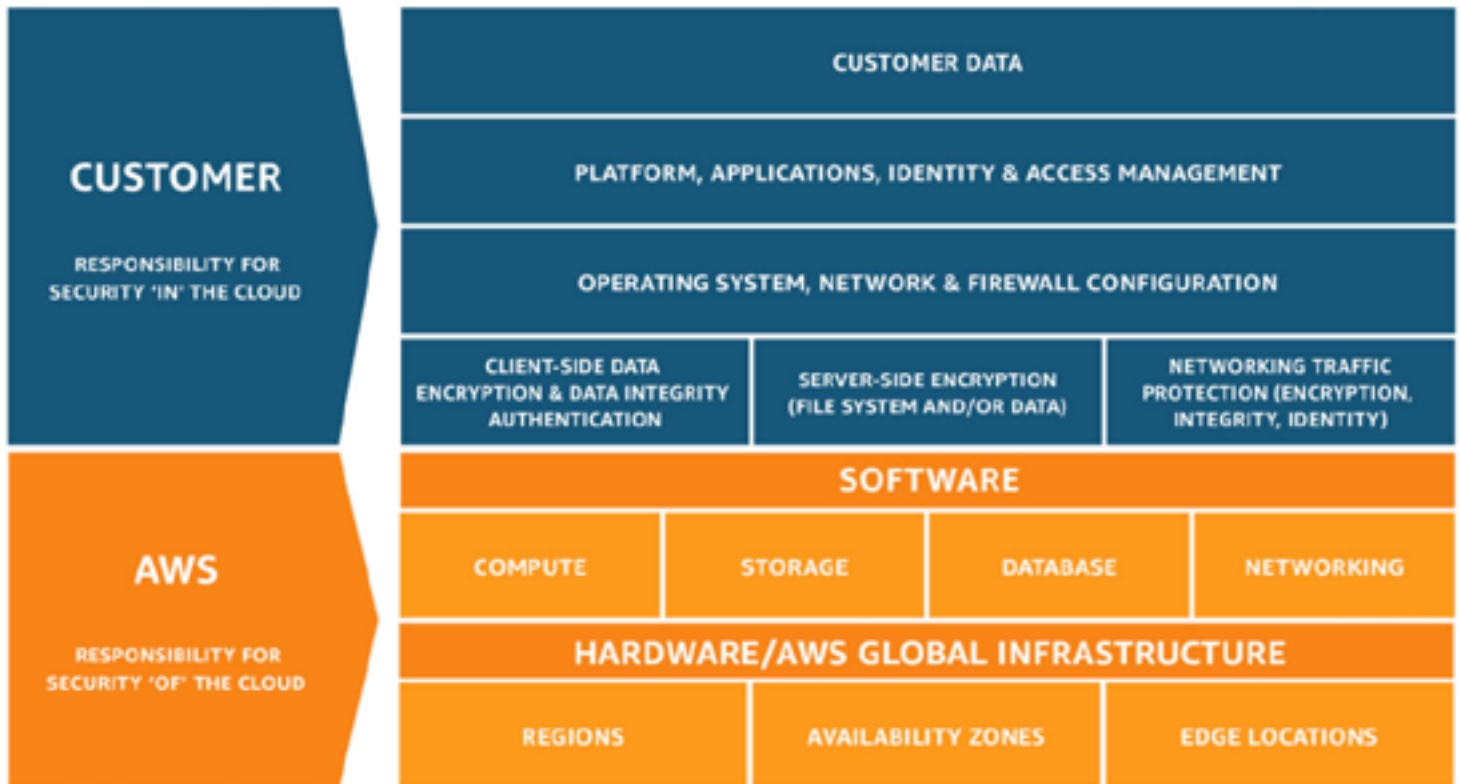


Image Courtesy of AWS: <https://aws.amazon.com/compliance/shared-responsibility-model/>



PCI COMPLIANCE CHECKLIST	RESPONSIBILITY	
	FSO	AWS
Safeguard cardholder data by implementing and maintaining a firewall.	✓	
Create custom passwords and unique security measures rather than default setting from vendor-supplied systems.	✓	
Safeguard stored cardholder data.	✓	
Encrypt cardholder data that is transmitted across open, public networks.	✓	
Anti-virus software implemented and actively updated.	✓	
Create and sustain secure systems and applications.	✓	
Keep cardholder access limited by need-to-know.	✓	
Users with digital access to cardholder data need unique identifiers.	✓	
Network resources and cardholder data access needs to be logged and reported.	✓	
Physical access to cardholder data needs to be restricted.		✓
Run frequent security systems and processes tests.	✓	✓
Address information security throughout your business by creating a policy.	✓	✓

## CLOUD ARCHITECTURE

Many Financial Services Organizations often begin their cloud journey with marketing, HR, and payroll SaaS (Software as a Service) running in the cloud. With inevitable and growing comfort with these cloud based offerings many FSOs embark upon a hybrid cloud/ data center design. Today with all the risk out of cloud technologies and their own experience validating cloud FSO is increasingly moving all in with the cloud.

### Hybrid Cloud on AWS

Like organizations in other highly regulated industries, Financial Service Organizations have traditionally owned and maintained their own infrastructure. Although many FSO are adopting a Cloud First approach, many enterprises are incrementally moving to AWS to capture the value of their legacy infrastructure investments and increased security and availability.

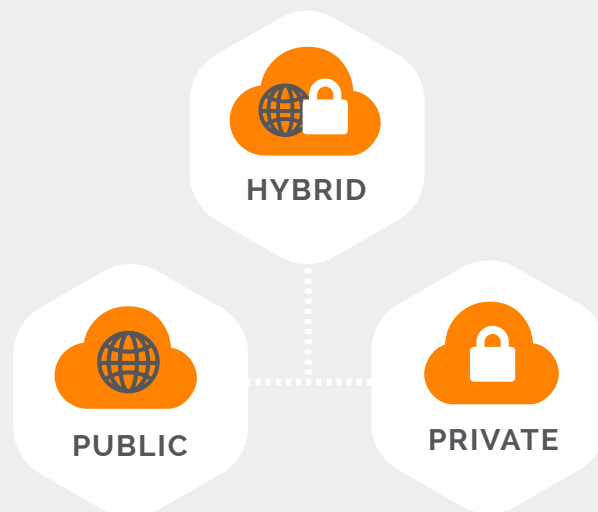
Having on prem and an AWS environment enable an organization to migrate applications and data to the cloud, increase their data-center capacity, utilize AWS tools, get their data closer to customers, and create backup and disaster recovery environments. AWS and their unprecedented depth of engineers and designs have best in class hybrid technologies across storage, networking, security, application deployment, and management tools. Partnerships with VMware, Intel, Microsoft, SAP and others enable the ability to run existing enterprise applications on AWS seamlessly.

With AWS tools FSOs can achieve the same or better control, reliability, and availability that are experienced at their data centers. AWS

FSO customers using S3 have confidence that their data at rest or in transit is protected with secure encryption and 99.99999999% durability.

AWS has the tools to make AWS a true complement to existing facilities. With **AWS Direct Connect**, customers can establish private connectivity between AWS and their data center, office or colocation facility. As well, **Amazon Virtual Private Cloud** (VPC) lets customers provision a logically isolated section of the AWS Cloud where they can launch AWS resources. Customers have control over IP address range, creation of subnets, and configuration of route tables in network gateways.

With economies of scale, AWS can deliver storage at a cost that can be exciting for FSO, used to investing in their own depreciating hardware. **AWS Storage Gateway** connects directly to on premise infrastructure as a file server, local disk volume, or as a virtual tape library. Ideal for migration, bursting and storage tiering this gateway enables scalability, durability, and access to low cost AWS storage.



## CLOUD PERFORMANCE

Amazon.com's Prime Day and Cyber Monday produces record setting sales spikes year after year. AWS was built to handle these, and when they offered their infrastructure to other enterprises this selling point resonated soundly with financial firms who themselves have seasonal and even daily spikes in usage. This elasticity offers cost and performance benefits where limitless traffic can be processed without any throttling or loss of performance. And customers only pay for the capacity when they need it.<sup>5</sup>

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One of the most demonstrable examples of the regulatory acceptance of cloud for FSOs is the regulatory body Financial Industry Regulatory Authority (FINRA), going all in with AWS with superb outcomes. The Wall Street regulator with mission critical data and the need to process 75 billion records per day with their market surveillance application. With AWS compute muscle, FINRA processing times have shrunk from 3-7 minutes to under 1. And they have achieved cost savings of over \$10M per year by outsourcing their infrastructure.<sup>6</sup>

With geographically dispersed infrastructure the cloud of 2019 can use code instead of hardware to automate previously manual processes, decreasing cost, human errors while having performance enhanced. With tablets, mobile phones, watches, laptops, desktops the end user can have peace of mind that all of their data can be accessed without further manipulation. These services are available and on demand 24x7.

In order to take full advantage of performance advantages of cloud infrastructure, workloads need to be architected with cloud infrastructure in mind. Prior to migrating workloads to the cloud, loosely coupled systems that can independently scale out, not up should be taken into consideration. Managing state becomes critical when servers become ephemeral, or when serverless architectures are employed.

Moving core banking functions to AWS in a measured, secure and proven way eases the transition. By taking into account application and data dependencies, architectural alignment and the competitive advantages of the cloud FSOs can realize scale, security and high availability. A phased approach will take into account short and long term goals while always striving for business and cloud platform alignment. With a 99.999% uptime SLA, AWS delivers security, performance and peace of mind.

4. Cloud Industry Forum, 2018, Cloud: Driving Business Transformation

5. AWS Case Study: Bankinter

6. <https://aws.amazon.com/solutions/case-studies/finra-data-validation/>

## SOFTWARE DEVELOPMENT

For Financial Service companies today, a growing cloud means a shrinking data center footprint. It means the silos between development and operations are being demolished and agile software development is producing game changing innovations with record time to market. By adopting and supporting a DevOps framework innovations can get to market in weeks instead of years and incumbent Financial Services Organizations can become digital and agile once again creating experiences that delight customers and attract new ones.

Cloud computing makes new products and services easier to develop and launch, which is particularly important for a financial services industry that has traditionally been slow to respond to evolving customer requirements due to legacy infrastructure investments.

With over seventy million accounts, Capital One is the world's largest digital bank. By adopting a cloud first strategy they have shrunk their data center footprint from 8 to just 3 in just the past 5 years.<sup>7</sup> They wanted to get out of the infrastructure business and focus on human centric developments that dazzle their customers, attract new customers and zoom them in front of the competition. With over 1,000 engineers on staff they create software instead of managing software and infrastructure.



**"AWS enables us to operate more securely in the public cloud, than we could in our own data centers."**

**Rob Alexander,  
Capital One CIO**

For Capital One and other financial service organizations being agile in the cloud allows for rapid development and integration of emerging technologies, such as big data, blockchain, AI, robotics and IOT. As the cloud continues to intuitively integrate our digital and physical lives the cloud and robust networks become the enabler for this symbiosis.

With mobile usage already outpacing desktop usage 2 to 1, this revolution will continue in the streets, in the car, on our bikes and on the bus.

**7. AWS re:Invent 2015 Keynote | Rob Alexander, CIO, Capital One**

## FINANCIAL BENEFITS

Utilizing economies of scale, AWS has built a distributed, secure, high availability production and storage ecosystems that cannot be replicated by a single user. AWS is a cloud engineering powerhouse with thousands of engineers developing solutions to make the ecosystem work securely, efficiently and effectively. With the right architecture, design, cost controls and monitoring these ecosystems can deliver profound performance enhancements and cost savings.

Cloud infrastructure got its start as an easy to use tool for developers, and as a low cost of entry infrastructure option for startups. As companies saw the benefits cloud infrastructure offered, they pushed companies like Amazon to offer services for mission critical infrastructure. The market responded. FSOs can scale with AWS, knowing they have levels of certification, regulatory compliance, and operational excellence that no single company could afford to recreate.

By partnering with cloud vendors to use services like AWS, Financial Services institutions can gain the agility that comes with cloud infrastructure without compromis-

ing security, durability, or availability. With huge seasonal usage spikes, the financial services vertical is an ideal partner with the public cloud. This paradigm shift in modern IT, takes away the costly upfront CapEx (Capital Expenditure) and replaces it with a right sized, elastic OpEx (Operating Expenditure.)

With expensive hardware, power, cooling, security, annual license fees the cost of doing business in banking, insurance, mortgages and payment technologies was prohibitive just 10 years ago. With cloud technologies start-ups need not make an investment in infrastructure and can instead focus their solutions on software design and building applications that harness the enterprise level compute and storage the cloud securely offers. By only paying for what they use the nimble start-up is upending a previously monopolistic high street, and forcing the market to innovate or go the way of Kodak.

Getting out of the costly infrastructure business can make companies much more efficient and reactive to market conditions. Embracing cloud means embracing all of the

attributes that come with cloud infrastructure. Financial Services firms can benefit greatly, but there is a level of commitment, and a level of effort involved in transforming applications, systems, and infrastructure architecture. Operational models must be transformed in order to get the true benefit from the cloud. This can only happen with executive leadership's public commitment to cloud, as well as tolerance for growing pains and investments in rebuilding capabilities in new areas. A cloud transformation can only happen from the top down.

By getting out of the space, power, cooling and physical layer of data storage and production, costly and idle reactive servers and facility engineers can be replaced by proactive software engineers creating new products and services that add to the bottom line. The pay-as-you-go model, and subscription based approach of AWS, right sizes infrastructure at scale. Data can be manipulated with fine grained controls and processed securely at record compute

speeds. Actionable intelligence can inform software design to help deliver financial products that delight the modern consumer. Financial services firms can and are banking on AWS, and consumers can bank on a secure, performant future full of digital innovation thanks to cloud technologies.





## FOGHORN DELIVERS BUSINESS TRANSFORMATIONS ON AWS

Whether you are new to AWS or have an existing AWS environment you are looking to optimize, Foghorn can help. For over 10 years we have delivered outstanding results for clients on AWS. From DevOps in the Cloud to Security in theCloud, Foghorn has the talent, experience and credentials to deliver a velocity of innovation designed to increase performance while optimizing costs



## AWS SECURITY COMPETENCY

Foghorn knows cloud security and DevSecOps in the cloud. In 2017 AWS launched a security competency to highlight their partners who satisfy and exceed AWS Cloud security best practices. The framework for this certification covers incident response, logging and monitoring, security, access management and data protection. Foghorn delivers DevSecOps results for customers from HIPPA/HITECH to PCI.



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Foghorn Consulting was founded in 2008 with a mission to ensure that cloud computing initiatives deliver maximum value for its customers. Based in the Silicon Valley, Foghorn provides domain expertise in strategy, planning, execution and managed cloud services to high-growth and enterprise companies seeking a cloud partner. Our team of DevOps engineers, SRE's and certified cloud architects bring over 20 years of domain expertise to ensure your cloud initiatives are a success.



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