

There is No Cloud  
There is Just Someone Else's  
Regulator

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**Bank of America** 

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# Cryptography

## Cloud and Crypto: Asymmetric/TLS Keys

### Asymmetric/TLS (for data in motion RSA Key pair (created and stored inside at least a FIPS HSM))

- Minimum of 2048 bits, 4096 preferred
- During TLS Handshake: -
  - All RSA signing (or decryption) mechanisms offloaded to and performed by the HSM
- PFS Symmetric session keys can be handled by Server

## Cloud and Crypto: Symmetric Keys

### Symmetric keys (for data at rest)

- Must Be:
  - AES, minimum of 128 bits, 256 bits preferred
  - MASTER Keys (e.g. CMK)
    - must be created and stored in a FIPS approved HSM
    - MUST be for customer tenants ONLY
  - Data level Keys
    - can be outside the HSM, but MUST be encrypted by Master

## Cloud and Crypto: Background

- Key AWS services are not HSM enabled:
  - Elastic Load Balancer
  - API Gateway
  - AWS Certificate Manager
- Google and others have similar issues

# Key Management

# Data Destruction

# Audit



# Identity

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