

System Audit Report

Walkover Web Solutions Pvt. Ltd
Indore - 452018, MP, India

Report ID: R2311053 - 001

Date: 01-Mar-2024



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System Audit Report for Data Localisation

Assessment Client	Walkover Web Solutions Pvt. Ltd, Indore, Madhya Pradesh, India				
Assessment Objective	To ascertain data localisation requirements stipulated by RBI				
Assessment Scope	API services provided by Walkover Web Solutions Pvt. Ltd to Indian banks and other fintech clients for communication to their customers in India, delivered from the registered location in Indore, MP, India				
Assessment Criteria	<ul style="list-style-type: none">RBI Notification RBI/2017-18/153 DPSS.CO.OD No.2785/06.08.005/2017-2018; andFAQs: https://m.rbi.org.in/Scripts/FAQView.aspx?Id=130				
Assessment Type	Second Party		Assessment Language	English	
Lead Assessor	Ayilur Ramnath ayilur@alliedboston.com				
Assessment Team	Nil				
Client POC	Mr Chinmay Daga, COO				
Assessment Dates	Various		Assessment Mode	Remote Documentation and evidence review	
Report Date	01-Mar-2024	Report ID	R2311053 - 001		Status Final
Constraints	<ul style="list-style-type: none">Availability of relevant, required information				
Exclusions	<ul style="list-style-type: none">Other activities and clients and other standards and frameworks				
Report Prepared By	Ayilur Ramnath		Reviewed and Approved		Yes
Locations Assessed / Personnel Interviewed	<ul style="list-style-type: none">Documentation, practices and evidence review, remotelyNo locations visited and physical assessment performed				

Report signed by



Ayilur Ramnath

Auditor

Partner & Head - GRC

Allied Boston Consultants India Pvt. Ltd.



T Ganguly

Head – IT Consulting Group

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1.0 Executive Summary

Allied Boston has conducted an independent audit of the Storage of Payment System Data as per the requirements of the Reserve Bank of India as mentioned above in the criterial field and the findings are captured below.

This report is an *as is* report and does not have any futuristic views expressed or guarantees provided.

Fairly, Walkover is found to have implemented the necessary controls and meet the requirements of RBI related to *data localisation*.

2.0 Background

As per the Reserve Bank of India directive RBI/2017-18/153 DPSS.CO.OD No. 2785/06.08.005/2017-2018 and the supporting information provided by RBI in its FAQ's (Frequently Asked Questions) requires Payment System Operators (anyone in the value chain) to have the payment system data storage activities audited by an information systems auditor. The Payment systems operator is required to have the Systems Audit Report (SAR) approved by the Board of system provider and submit it to the Reserve Bank of India.

Walkover Web Solutions Private Limited ('Walkover) is providing a communication gateway between clients and their customers where the clients can send information via SMS, emails, WhatsApp etc. that may contain sensitive information.

Walkover has partnered with many banks and fintech companies to facilitate these features where Walkover, as a technology partner, will integrate the customer services/APIs with other providers like telecom companies to make the financial services available to the end customer.

Corporate Identification Number of the company: U72400MP2010PTC023806.

The management has asserted that they comply to all the requirements of the Reserve Bank of India directive RBI/2017-18/153 DPSS.CO.OD No. 2785/06.08.005/2017-2018 and the related FAQ's (Frequently Asked Questions).

3.0 Areas Audited

SNo.	Criteria	Findings
1	Payment Data Elements	<p>The payment data elements were identified involved in the transactions provided by Walkover and found that the payment data elements are stored in India. Some elements of processing happens outside India but the data is brought back to India subsequently and stored in India storage location which is GCP, Mumbai.</p> <p>The payment data elements have been classified as</p> <ol style="list-style-type: none"> OTP: This is the most sensitive data in our system and to secure this data we always keep our OTP in encrypted format. Client Mobile number, Email, Auth Token <ul style="list-style-type: none"> This is the second most important data to Walkover, as identified by the organisation, and this is strictly access controlled in the product with read only access to a set of designated persons Rest all the other data like Content, Campaign Name and others are also restricted from access. <p>Verification method:</p> <ol style="list-style-type: none"> Verification by practices, statements during the interview and system architecture. Information classification / identification provided by Walkover
2	Data flow of the application	<p>The data flow of the application was examined and found that the flow is in India only and no other jurisdiction involved in the data flow.</p> <p>Verification method:</p> <ol style="list-style-type: none"> Exhibit 1: Data Flow Diagram Verification by practices, statements and system architecture. Interview
3	Application architecture	<p>The application architecture was examined to match with the explanation and requirement. Found to be adequate at the moment.</p> <p>Verification method:</p> <ol style="list-style-type: none"> Exhibit 2: Application architecture

		<ol style="list-style-type: none"> 2. Verification by practices, statements and system architecture. 3. Interview
4	Network Architecture	<p>The Network Architecture of the Walkover's system was examined for the necessary security controls and found to be meeting the requirements.</p> <p>Verification method:</p> <ol style="list-style-type: none"> 1. Exhibit 3: Network architecture diagram 2. Verification by practices, statements and network architecture. 3. Interview
5	Data Storage	<p>The data is stored in a resilient MongoDB and AWS MySQL/Redis database. The database is hosted in the Google Cloud (GCP), Mumbai region, India and the back up is taken care of by GCP as part of the service contract. The data is stored only in the Indian jurisdiction. The data is also backed up in Google cloud (GCP) in India.</p> <p>Verification method:</p> <ol style="list-style-type: none"> 1. Exhibit 4, Exhibit 5, Exhibit 6: Network architecture diagram, Data storage 2. Verification by practices, statements and network architecture. 3. Interview
6	Transaction processing	<p>The transactions are initiated based on the trigger from the client application and passed on to the telecom (or other) service provider for further processing. The inward transactions and all transactions performed outside the Walkover application are handled by the clients. All the data is stored in Indian jurisdiction.</p> <p>The processing happens in AWS, Singapore location but the data is brought back to India for storage. No data is stored outside of India.</p> <p>Verification method:</p> <ol style="list-style-type: none"> 1. Exhibit 1, Exhibit 2, Network architecture diagram, Data storage 2. Verification by practices, statements and network architecture. 3. Interview

7	Post transaction processing	<p>Post transaction processing activities, the data is brought back to India and stored in GCP Mumbai data centre.</p> <p>Verification method:</p> <ol style="list-style-type: none"> 1. Exhibit 1, Exhibit 2, Network architecture diagram, Data storage 2. Verification by practices, statements and network architecture. 3. Interview
8	Domestic Payment systems transactions	Not Applicable to the organisation as Walkover is not a payment gateway.
9	Cross border payment transactions	Cross border transactions are not currently supported by the Walkover application for Indian clients.
10	Database Storage and Maintenance	<p>All payments data storage is done only in Indian jurisdiction at GCP Mumbai Region. Database maintenance is done by the IT Team of Walkover and logs are maintained of all activities done.</p> <p>Verification method:</p> <ol style="list-style-type: none"> 1. Exhibit 2, Exhibit 4, Exhibit 5, Exhibit 6, Network architecture diagram, Data storage 2. Verification by practices, statements and network architecture. 3. Interview
11	Database security	<p>The elements identified as sensitive are encrypted at a record level. All activities on the production system are logged.</p> <p>Walkover has asserted that they do not share the payments data with any organisation including group/ related entities other than their customers, law enforcement and the payment networks, as appropriate, as on date.</p> <p>Verification method:</p> <ol style="list-style-type: none"> 1. Exhibit 2, Exhibit 4, Exhibit 5, Exhibit 6, Exhibit 7 2. Access Control & User Access Management Policy _ Password Policy _ MSG91 (Walkover).pdf 3. Verification by practices and statements 4. Interview
12	Access management	Walkover has asserted that the sensitive data related to payment processing is not accessed from any location

		<p>outside the Indian jurisdiction for any administrative/ processing/ sharing purposes.</p> <p>Verification method:</p> <ol style="list-style-type: none"> Exhibit 2, Exhibit 4, Exhibit 5, Exhibit 6, Network architecture diagram, Data storage Access Control & User Access Management Policy _ Password Policy _ MSG91 (Walkover).pdf Interview
13	Management assertion	<p>The management has asserted that the organisation – Walkover - complies with all the requirements of the Reserve Bank of India directive for data localisation.</p> <p>Verification method:</p> <ol style="list-style-type: none"> Exhibit 8

4.0 Exhibits

Exhibit 1

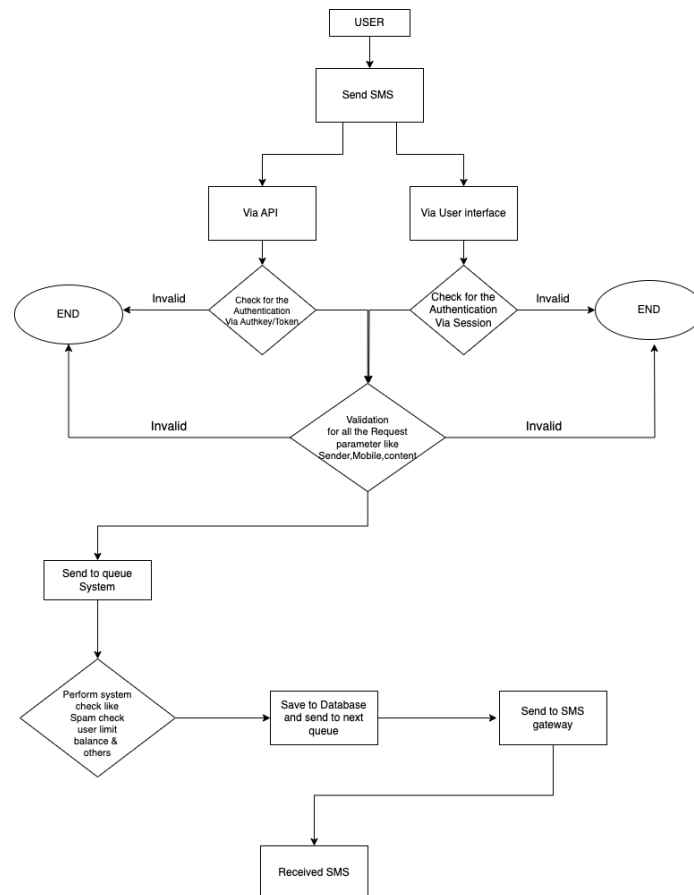


Exhibit 2

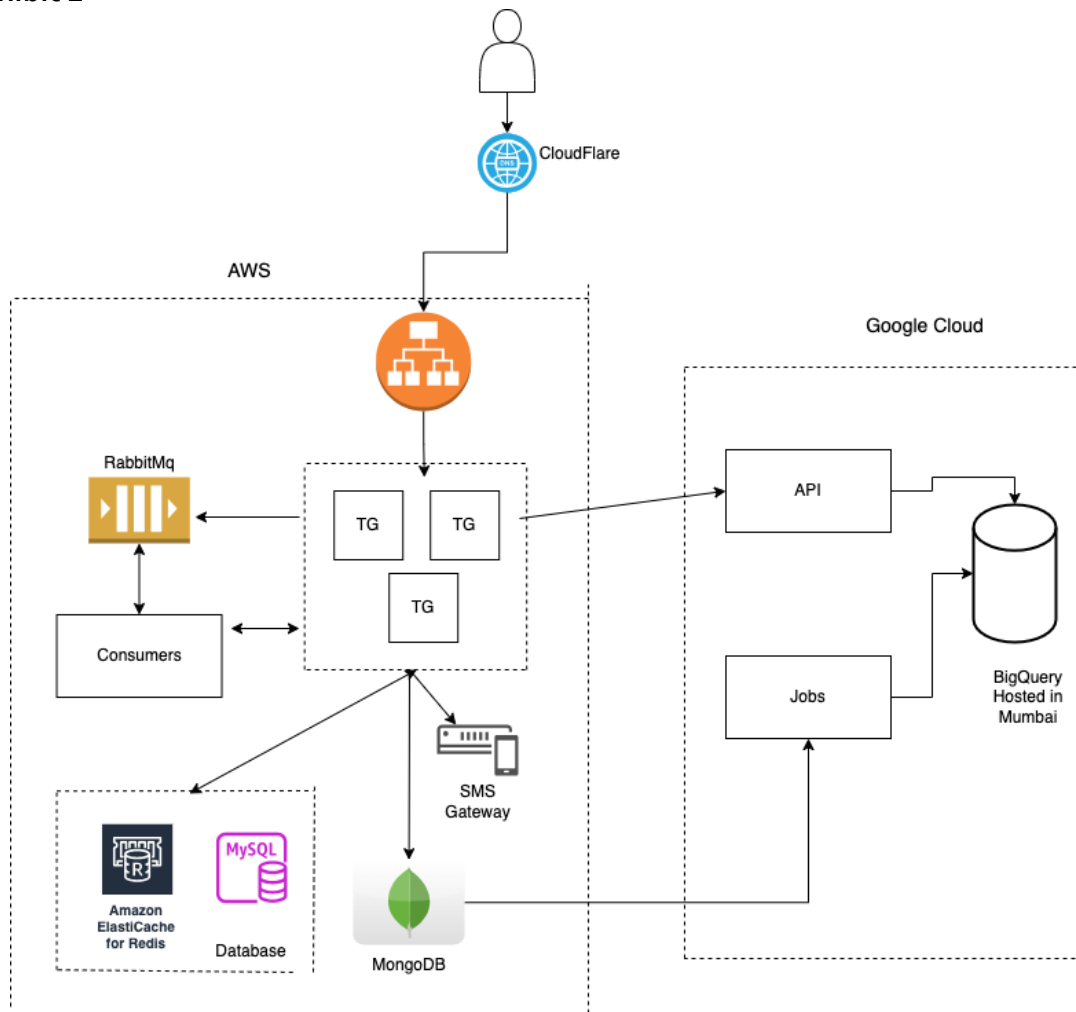


Exhibit 3

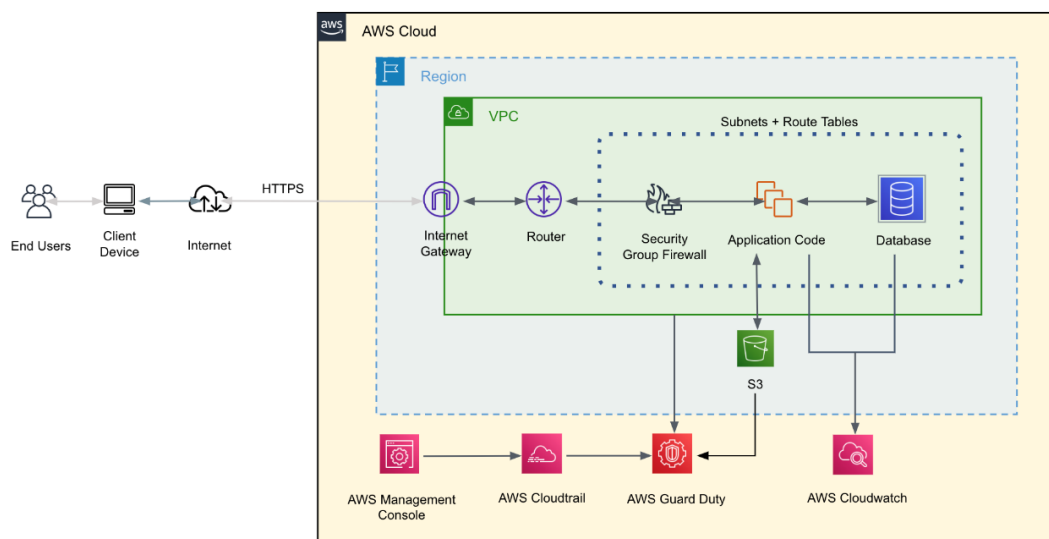


Exhibit 4

The screenshot shows the Google Cloud Platform Explorer interface. The left sidebar contains a search bar and a list of resources. The main panel displays the 'Dataset info' for 'msg91_production'. The 'Data location' field is highlighted with a red box, showing 'asia-south1'.

Property	Value
Dataset ID	msg91-reports.msg91_production
Created	Jun 7, 2023, 4:38:31 PM UTC+05:30
Default table expiration	Never
Last modified	Jun 21, 2023, 6:34:37 PM UTC+05:30
Data location	asia-south1
Description	
Default collation	
Default rounding mode	ROUND_HALF_UP, UNPRECISED
Storage billing model	PHYSICAL
Case insensitive	True
Labels	
Tags	

Exhibit 5

The screenshot shows the Google Cloud Platform Explorer interface. The left sidebar contains a search bar and a list of resources. The main panel displays the 'Dataset info' for 'msg91_production'. Below the dataset info, there is a 'Dataset replica info' section and a 'Job history' section.

Property	Value
Dataset ID	msg91-reports.msg91_production
Created	Jun 7, 2023, 4:38:31 PM UTC+05:30
Default table expiration	Never
Last modified	Jun 21, 2023, 6:34:37 PM UTC+05:30
Data location	asia-south1
Description	
Default collation	
Default rounding mode	ROUND_HALF_UP, UNPRECISED
Storage billing model	PHYSICAL
Case insensitive	false
Labels	
Tags	

Property	Value
Primary location	asia-south1
Replicas	1

Job history

Exhibit 6

The screenshot shows the Atlas UI interface. The left sidebar contains a search bar and a list of resources. The main panel displays the 'Backup' configuration for 'ProdMailer'. The 'Backup' section shows a table of backup snapshots.

Time Created	Retention	Frequency	Cluster Type	Provider & Regions	Used Size	Version	Encryption Key ID	Actions
02/20/24 - 08:55 AM	2 days 5:00	Hourly	Replica Set	AWS, ap-south-1	4.89 GB	5.0.24	Not enabled	
02/19/24 - 08:55 PM	2 days 5:00	Hourly	Replica Set	AWS, ap-south-1	4.76 GB	5.0.24	Not enabled	
02/19/24 - 08:54 AM	2 days 5:00	Hourly	Replica Set	AWS, ap-south-1	4.77 GB	5.0.24	Not enabled	
02/18/24 - 08:55 PM	2 days 5:00	Hourly	Replica Set	AWS, ap-south-1	4.76 GB	5.0.24	Not enabled	

Exhibit 7

The screenshot shows the Google Cloud BigQuery console interface. The top navigation bar includes the Google Cloud logo, a dropdown menu for 'msg91-reports', and a search bar. Below the navigation bar, the 'Explorer' panel on the left shows a tree view of resources, with 'msg91_production' selected. The main panel displays the 'Dataset info' for 'msg91_production', including details like 'Created', 'Default table expiration', 'Last modified', 'Data location', 'Description', 'Default collation', 'Default rounding mode', 'Storage billing model', 'Case insensitive', 'Labels', and 'Tags'. The 'Dataset replica info' section shows 'Primary location' as 'asia-south1' and 'Replicas' as '1'. On the right, the 'Description' field is empty, and the 'Labels' section has an '+ ADD LABELS' button. The 'Tags' section has a 'SELECT SCOPE' dropdown. The 'Advanced options' section includes 'Default Collation' (set to 'Default Collation'), 'Default Rounding Mode' (set to 'Default Rounding Mode'), 'Case Insensitive' (unchecked), 'Storage Billing Model' (checked), and 'Time Travel Window' (set to '7 Days'). At the bottom right, there are 'SAVE' and 'CANCEL' buttons.

Dataset info

Dataset ID: msg91-reports:msg91_production

Created: Jan 7, 2023, 4:58:37 PM UTC+5:30

Default table expiration: Never

Last modified: Oct 31, 2023, 6:34:37 PM UTC+5:30

Data location: asia-south1

Description:

Default collation:

Default rounding mode: ROUNDING_MODE_UNSPECIFIED

Storage billing model: PHYSICAL

Case insensitive: false

Labels:

Tags:

Dataset replica info PREVIEW

Primary location: asia-south1

Replicas: 1

Description

Labels

Labels help organize your datasets and tables (e.g., cost_center:sales or env:prod). [Learn more](#)

+ ADD LABELS

Tags

Tags help you manage and enforce policies on your resources. Tags consist of a unique tag key and a set of tag values. [Learn more](#)

SELECT SCOPE

Advanced options

Default Collation

☐ Enable default collation

Default Collation

Default Rounding Mode

The dataset default rounding mode will be applied to any new table created within this dataset. Default rounding mode can be created or altered later.

Default Rounding Mode

Case Insensitive

☐ Enable case insensitive table names

Storage Billing Model

☒ Enable physical storage billing model

Time Travel Window

Time Travel Window

7 Days

SAVE CANCEL

Exhibit 8



Walkover Web Solutions Pvt. Ltd
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10/2 Old Palasia, Indore-452018, MP, India
CIN: U72400MP2010PTC023806
GSTIN: 23AAACW9768L1ZO

Management Assertion

Management of Walkover Web Solutions Private Limited ("Walkover") is accountable for the completeness, accuracy and validity of the below information and all other information and evidence provided as part of the SAR Data Localisation audit.

With respect to the metrics identified below, the management of Walkover asserts that such sustainability metrics are presented in conformity with the assessment criteria set forth below:

Metric Description	Definition / Criteria
Services provided	Providing a gateway for communication between Clients (bank, fintech or other Enterprises) and their Customers where Clients can send information via SMS, Emails, WhatsApp, etc. containing PI/PII or other sensitive information.
Data storage	<p>We hereby confirm –</p> <p>All data of our Indian Clients are stored in India.</p> <p>All this data is encrypted in rest. Transaction processing happens in AWS Cloud, Singapore and post processing, all this data is kept in <u>GCP, Mumbai region</u>.</p> <p>This Data is only shared with Clients and in case of Law enforcement agencies request for data, we share the data with them.</p> <p>From Outside India, it is not possible to access the database to do administration tasks .</p>

	<p>All database management / administration events through which this Data is displayed on MSG91 Admin Panel are logged and retained for 3 years.</p> <p>To amend the database administration changes two people (CTO or VP Engineering) have to validate the request and then to be approved by the CEO (Director).</p> <p>What was within the scope of this audit/assessment are the services delivered only to our Indian Clients.</p> <p>No cross-border transactions where the Client is Non Indian is not involved in this.</p> <p>We are not a payment gateway.</p> <p>Payment methods supported are NEFT / RTGS / IMPS and for Card Payments, we use Payment Gateways like Razorpay, etc.</p>
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For Walkover Web Solutions Pvt. Ltd

 Director

Ravindra Singh, Director
Walkover Web Solutions Pvt. Ltd

Place: Indore

Date: 1 March 2024

--- End of report ---