CYBERTASKFORCE

OBSERVATORY

SecNumCloud

JANUARY 2025 EDITION

Une qualification, un cadre, un marché de confiance

The news in December was S3NS obtaining SecNumCloud qualification. S3NS—the joint venture between Thales and Google Cloud—has now formally entered the circle of qualified providers. Given the intensity of reactions on social media, I felt necessary to address the issue head-on and bring the conversation back to where it belongs: trust. I would have preferred to talk about the qualified players, the new entrants, the market, Europe, or the offerings themselves. Unfortunately, the ideological reflexes of parts of the ecosystem once again force us to spend time re-litigating fundamentals instead of focusing on building capability.

This qualification triggered a wave of emotion that exposed a blind spot—if not a darker side—of the ecosystem. Reading some of the reactions, one might think SecNumCloud is a label reserved for «friends», awarded based on ideological affinity rather than substance. Let's be clear: neither the French state nor ANSSI operates on favoritism. That is precisely why it is worth restating what SecNumCloud actually is. SecNumCloud is not an opinion. It is not an ideological totem, nor a piece of industrial marketing. It is a trust framework, assessed by an independent authority on behalf of the state, based on some of the most demanding technical, legal, organizational, and operational requirements in the world.

A Line of Debate, Not a Fault Line

The debate exists—and it is legitimate. It concerns industrial partnerships, the role of non-European actors, governance arrangements, control mechanisms, and reversibility conditions. That debate is healthy. But it must take place upstream of the framework, not downstream of a qualification—after the competent authority has assessed and ruled according to established rules. Turning the qualification itself into the battleground for political or ideological disputes would be a structural mistake. It raises a simple question for all qualified providers: what is a qualification worth if it only matters when it confirms what one wanted to see confirmed? If it only applies to some, then it ultimately applies to none.

The Real Good News: A Market of Trust

What this qualification confirms above all is not the victory of one actor over another, but the gradual emergence of a market built on trust. Alongside already qualified providers, S3NS brings its own answer to the challenges created by a fragmented world and fractured trust. SecNumCloud is not designed to exclude; it is designed to include on the basis of explicit, verifiable, and enforceable rules. Qualified providers, as well as those working toward qualification, are making massive investments, taking real industrial risks, and building trust architectures where trust had long remained implicit or merely declarative. That collective dynamic is what deserves attention and recognition.

SecNumCloud is not a French anomaly. Its U.S. counterpart, FedRAMP, follows the same logic: a demanding framework, conditional access to the public market, a validating authority, inclusion through compliance rather than origin. No one views FedRAMP as an ideological instrument. It is understood for what it is: a tool to structure the market and protect strategic interests. SecNumCloud plays exactly that role—for France and for Europe.

From Debate to Framework: Making the Trust Market Function

The strategic debate has already taken place. It clarified positions, surfaced disagreements, and framed the issues. The next step is clear: making the European market of trust actually function.The qualification of S3NS takes nothing away from other qualified providers. It simply reiterates a fundamental principle: trust is not proclaimed, it is demonstrated—and once demonstrated within a shared framework, it must be recognized as such. Undermining that principle weakens the entire structure.

The real question, then, is not who "deserves" qualification according to shifting preferences, but how to turn qualification into a business lever for the companies that have committed to it. That is our ambition—and what we hope to focus on in the coming month. No company has time to replay the debates of 2018 while the market hardens and the world with it. It is time to think in terms of markets and expansion. That is where the private sector must assume responsibility. The state, for its part, has done its job.

Thank you, and see you soon,
SÉBASTIEN GARNAULT

SecNumCloud
What's Up?

On December 19th 2025, S3NS obtained the SecNumCloud qualification for its offer named 'Cloud de Confiance PREMI3NS.' The qualification covers the IaaS, PaaS and CaaS layers.

Two new firms entered the process to obtain the SecNumCloud qualification:

> **Adista, with its offer Adista Secure Cloud on the IaaS layer**
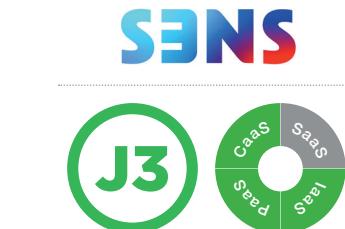
> **Bretagne Télécom, with its offer Blue Secure Cloud on the IaaS layer**

The technical point

The qualification by composition

The qualification by composition has been introduced with the updated SecNumCloud 3.2. It allows a provider **to build a qualified offering by relying on third-party services that are already SecNum-Cloud-qualified**. Instead of developing every layer from scratch, the provider assembles existing trusted building blocks—across IaaS, PaaS, CaaS, or SaaS—and adds its own service layer, which is then submitted for qualification.

This approach **significantly reduces both the burden and the cost** of the SecNumCloud qualification process, as services that are already qualified are not subject to a new audit.

The applicant must demonstrate its ability to integrate, govern, and operate these pre-qualified components within a coherent, secure offering that remains fully compliant with the SecNumCloud requirements.

As part of a qualification by composition, ANSSI assesses in particular:
> the integration **architecture** of the qualified services, including dependencies, data flows, and isolation mechanisms
> **the governance** of third-party providers, covering contractual arrangements, allocation of responsibilities, and incident management
> **the overall** operational and security consistency of the assembled offering
> the provider's ability to **maintain compliance** over time

Zoom on the Qualified Providers

Qualification: a Long-Term Corporate Commitment

Companies that have obtained SecNumCloud qualification were early movers in committing to the qualification process. Their decision reflects a near-civic form of engagement, demonstrating a strong alignment between corporate values and the security and trust objectives embedded in the SecNum-Cloud framework. For these companies, security and trust are not compliance constraints—they are part of their DNA.

2019	2020	2021	2022	2023	2024	2025

2019: 3DS OUTSCALE, oodrive, CLOUD TEMPLE
2021: OVH, WORLDLINE
2024: Whaller, INDEX ÉDUCATION, cegedim
2025: SENS, Orange Business
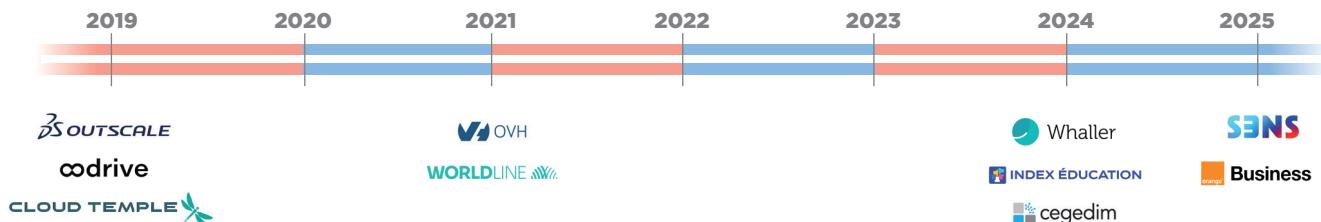
The Qualified Providers

	CLOUD TYPE	SHARE OF QUALIFIED OFFER	TARGETED CLIENTS	NUMBER OF MANAGED SERVICES	GEOGRAPHICAL PERSPECTIVE	QUALIFICATION BY COMPOSITION	PLANS TO EXTEND QUALIFICATION
3DS OUTSCALE	Shared	~40 (30 50 80 100)	Private Sector, OIV/OSE, Public Sector	10+	Europe	Facilitateur	✓
cegedim		Information not available					
CLOUD TEMPLE	Shared	~100 (30 50 80 100)	Private Sector, OIV/OSE, Public Sector	20+	France	Facilitator	✓
INDEX ÉDUCATION		Information not available					
oodrive		Information not available					
Orange Business		Information not available					
OVH	Dedicated	~30 (30 50 80 100)	SMEs, Private Sector, OIV/OSE, Public Sector	20+	France	Facilitator	✓
SENS	Shared	~90 (30 50 90 100)	PME/TPE, Secteur privé, OIV/OSE, Public Sector	50+	Europe	Facilitator	✓
WORLDLINE	Dedicated & Shared	~35 (30 50 80 100)	Private Sector, Public Sector	10+	France	Facilitator	✓
Whaller	Shared	~35 (30 50 80 100)	SMEs, Public Sector	10+	Monde	Beneficiaries	✓

Shared cloud: Hardware resources are shared across multiple tenants.
Dedicated cloud: Hardware resources are allocated exclusively to a single tenant.

SecNumCloud
What is it?

SecNumCloud is the ANSSI framework that defines security and sovereignty requirements for cloud computing services used by administrations and businesses in France.

The difference between qualification and certification

A qualification verifies a provider's or service's ability to meet a need (trust, skills, expected level).

A certification, issued by a third-party organization, attests to conformity with a specific standard or framework.

It aims to attest

1. The quality and robustness of a cloud service
2. The competence of the cloud operator
3. The trust that can be placed in the operator

It establishes a multi-dimensional framework

1. Technical
2. Operational
3. Legal

Technical Criteria

> **Documented risk assessment** covering the entire scope of the service.
> **Annual updating** of information security and business continuity plans.
> **Obligation to inform** the client in the event of a personal data breach.
> **Appointment** of an information systems security manager.
> **Appointment** of a physical security manager.
> **Daily data backup** policy.

Operational Criteria

> **Strong multi-factor authentication** to access administration interfaces.
> **Nominative accounts** for users.
> **An encryption mechanism** that prevents data recovery in the event of a resource or physical support reallocation.
> **Segregation of network flows** (logical/physical/encrypted).
> **Active monitoring** to manage technical vulnerabilities and evaluate risk exposure.

Legal Criteria

> The provider's statutory headquarters, central administration, and principal establishment **must be established within an EU Member State.**
> **Limits on the holding of capital and voting rights** by non-EU entities: 24% individually, 39% collectively.
> **Storage and processing of data within the EU.**
> **Justified compliance with GDPR principles** (legitimate purposes, limited data retention period).
> The service agreement must include **a reversibility clause** providing for the secure restitution and erasure of the client's data upon contract termination or for any other cause.

The Qualification Procedure

J0 Application for qualification submitted to ANSSI

J2 Evaluation strategy accepted

J1 Evaluation work accepted

J3 Qualification decision by ANSSI.

J0
> Detailed description of the services submitted for qualification
> Demonstration of conformity to the SecNumCloud framework
> Selection of a qualified auditor responsible for conducting the J2 audits

J1
> Validation by ANSSI of the audit plan proposed by the evaluation body
> Roadmap for J2 audits

J2
> Technical and organizational audits are conducted on-site by the accredited organization.
> The report is transmitted to ANSSI for analysis.

J3
> ANSSI reviews the J2 audit report
> Potential requests for corrective actions
> Potential request for additional information or validation of the certification qualification

The Main Evaluation Criteria

Technical Criteria
> Documented risk assessment covering the entire scope of the service.
> Annual updating of information security and business continuity plans.
> Obligation to inform the client in the event of a personal data breach.
> Appointment of an information systems security manager.
> Appointment of a physical security manager.
> Daily data backup policy.

Operational Criteria
> Strong multi-factor authentication to access administration interfaces.
> Nominative accounts for users.
> An encryption mechanism that prevents data recovery in the event of a resource or physical support reallocation.
> Segregation of network flows (logical/physical/encrypted).
> Active monitoring to manage technical vulnerabilities and evaluate risk exposure.

Legal Criteria
> The provider's statutory headquarters, central administration, and principal establishment must be established within an EU Member State.
> Limits on the holding of capital and voting rights by non-EU entities: 24% individually, 39% collectively.
> Storage and processing of data within the EU.
> Justified compliance with GDPR principles (legitimate purposes, limited data retention period).
> The service agreement must include a reversibility clause providing for the secure restitution and erasure of the client's data upon contract termination or for any other cause.

SecNumCloud
Who is it?

Services Under Review for Qualification

	IN PROGRESS		QUALIFIED	
	Applicants	**Offering**	**Provider**	**Offering**
IaaS	Adista	dista Secure Cloud	Cegedim	CegNumCloud Secured IaaS
	Bleu	Cloud de Confiance Bleu	Cloud Temple	IAAS Secure Temple
	Cyllene ITS	IaaS SecNumCloud	OVH	Bare Metal Pod
	Ecritel	Ecritel Secure Cloud	OVH	Hosted Private Cloud powered by VMware
	Gip Mipih (Numih France)	Cloud Premier Souverain		
	ITS Integra	IT SecureCloud	Orange Business	CloudAvenueSecNum
	Numspot	Plateforme des services cloud	Outscale	IaaS
	Orange Business	Cloud Avenue SecNum Dynamic	Worldline	Worldline Cloud Services
	OVH SAS	SNC Cloud Platform	S3NS	Cloud de Confiance PREMI3NS
	Prolival - Groupe Tenexa	Horizon SecNumCloud		
	Scaleway	Scaleway SecNumCloud		
	Bretagne Télécom	Blue Secure Cloud		
CaaS	Bleu	Cloud de Confiance Bleu	S3NS	Cloud de Confiance PREMI3NS
	ITS Integra	ITSecureKube		
PaaS	Bleu	Cloud de Confiance Bleu	Cloud Temple	PaaS Openshift
	OVH SAS	SNC Cloud Platform	S3NS	Cloud de Confiance PREMI3NS
	Scaleway	Scaleway SecNumCloud		
SaaS	Ecritel Solutions	Ecritel Secure Backup	Index Education	EDT
	NetExplorer	Share and Workspace	Index Education	Hyperplanning
	Cloud Solutions	Wimi	Index Education	Pronote
			Index Education	Pronote Primaire
			Oodrive	Oodrive_Work _Share
			Oodrive	Oodrive_Work
			Oodrive	Oodrive_Meet
			Whaller	Whaller Donjon SaaS

Free Pro is also undergoing qualification, but no public information is available on the type of qualification requested.

The candidates

|	
IaaS	Adista · Bleu · blue. · Orange Business · Cyllene · ecritel · ITS Integra · Numih France · NumSpot · OVH · Scaleway · Tenexa
CaaS	Bleu · ITS Integra
PaaS	Bleu · OVH · Scaleway
SaaS	ecritel · NetExplorer · WIMI

Scope of the qualification

IN PROGRESS

adista
CaaS · SaaS · IaaS · PaaS
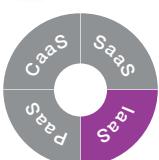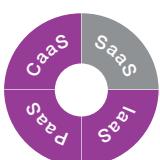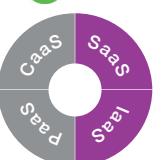
Bleu
CaaS · SaaS · IaaS · PaaS

blue.
CaaS · SaaS · IaaS · PaaS

CYLLENE
CaaS · SaaS · IaaS · PaaS

ecritel
CaaS · SaaS · IaaS · PaaS

free PRO
Données non pbliques

ITS Integra
CaaS · SaaS · IaaS · PaaS

NetExplorer
CaaS · SaaS · IaaS · PaaS

Numih France
CaaS · SaaS · IaaS · PaaS

NumSpot
CaaS · SaaS · Ia · aS

orange Business
CaaS · SaaS · IaaS · PaaS

OVH
CaaS · SaaS · IaaS · PaaS

Scaleway
CaaS · SaaS · IaaS · PaaS

Tenexa
CaaS · SaaS · IaaS · PaaS

WIMI
CaaS · SaaS · IaaS · PaaS

QUALIFIED PROVIDERS

3DS OUTSCALE
CaaS · SaaS · IaaS · PaaS

cegedim
CaaS · SaaS · IaaS · PaaS

CLOUD TEMPLE
CaaS · SaaS · IaaS · PaaS

INDEX ÉDUCATION
CaaS · SaaS · IaaS · PaaS

oodrive
CaaS · SaaS · IaaS · PaaS

orange Business
CaaS · SaaS · IaaS · PaaS

OVH
CaaS · SaaS · IaaS · PaaS

S3NS
CaaS · SaaS · IaaS · PaaS
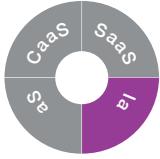
Whaller
CaaS · SaaS · IaaS · PaaS

WORLDLINE
CaaS · SaaS · IaaS · PaaS

Status of candidates

- **J0** Application for qualification submitted to ANSSI
- **J1** Evaluation work accepted
- **J2** Evaluation strategy accepted
- **J3** Qualification decision by ANSSI

J0 · · · · · · · · **J1** · · · · · · · · **J2** · · · · · · · · **J3** · · · · · ·

J0: ITS Integra, Tenexa

J1: Bleu, ecritel, NetExplorer, NumSpot, Scaleway, S3NS

Glossary of Cloud Offerings

IaaS (Infrastructure as a Service)

> Provision of physical computing resources.
> **The provider owns** the physical infrastructure and rents it or makes it available to a user.
> **The client builds** his activity on this platform

> **The provider** owns all the physical material, including machines, network, and storage.
> **The client** builds the services according to his needs, decides the scope/perimeter, and determines the possible uses on the leased infrastructure.

The Specifics of *IaaS*

- *Strict segregation between users.*

- *To prevent data recovery during resource reallocation or physical support recovery, **encryption (of the disk, file system, or by volume) with a key per client is required***

CaaS (Container as a Service)

> Provision of tools allowing **the deployment, management, and orchestration of application** containers.
> **A container** is like a small, isolated box that contains everything necessary for an application to function (libraries, code, tools, etc.), without interfering with others.

> **The provider** manages the underlying infrastructure (servers, storage, network, operating system).
> **The client** controls the containers and the technical elements related to their applications

The Specifics of *CaaS*

- *Strict segregation between clients.*
- *Recommended cryptography: encryption by volume (one key/client).*
- *Secure obliteration at the end of the contract means the secure erasure of the encryption keys for the client's storage spaces.*
- *Administration and supervision operations must be carried out **from within the European Union***

PaaS (Platform as a Service)

> Provision of **a technical platform ready for use** to develop, host, and run applications.

> **The provider** manages the entire infrastructure part (network, servers, storage, operating system, etc.).
> **The client** focuses on the development and management of their own applications

The Specifics of *PaaS*

- *The provider has a **duty to inform** the client in case of modification to the software elements that the provider controls.*
- *Strict segregation between clients interfaces: the resources allocated for the use of one client must not be accessible to other clients*

SaaS (Software as a Service)

> Provision of **ready-to-use applications**, hosted in the cloud and fully managed by the provider.
> The user simply accesses the application via the Internet—without having to install, host, or maintain anything.

> **The provider** manages all the technical aspects requiring IT skills.
> **The client** does not control the cloud platform but can modify configuration settings swithin the application.

The Specifics of *SaaS*

- *Multi-factor authentication for end-user access.*
- *Segregation between the administration interfaces made available to clients and the interfaces allowing end-user access*

The **S**ources of December

**Cloud Computing
Service Providers**
ANSSI

**Catalogue of certified
products and services**
ANSSI, October 2025

**Providers undergoing
qualification**
ANSSI

Qualification SecNumCloud
AFNOR

J3 for SENS
*Press release, SENS
December 19, 2025*

J0 for Adista
*Press release, Adista
December 16, 2025*