

Use this checklist to verify your penetration testing program satisfies SOC 2 Type II requirements. **Evidence of testing must map directly to the Trust Services Criteria (TSC).** Auditors will look for scope documentation, methodology, findings reports, and remediation tracking.

CC6 –  
LOGICAL  
ACCESSCC7 –  
SYSTEM  
OPSA1 –  
AVAILABILITYCC9 –  
RISK  
MGMT**01 SCOPE & PLANNING**

CC3.2 / CC9.1

- Define **in-scope systems**: production environment, APIs, cloud infrastructure, and any cardholder/PII data stores **CRITICAL**
- Obtain **written authorization** (Rules of Engagement) signed by system owner before testing begins **CRITICAL**
- Document **testing methodology** (OWASP, PTES, NIST SP 800-115, or equivalent) **HIGH**
- Set testing window and notify operations/IR team to avoid false incident triggers **MEDIUM**
- Confirm **tester qualifications**: OSCP, CEH, or equivalent credentials documented for auditor review **MEDIUM**
- Verify testing covers **all system components** in the SOC 2 system description boundary **HIGH**

**02 NETWORK & INFRASTRUCTURE**

CC6.6 / CC6.7

- Perform **external network scan** to enumerate exposed ports, services, and public-facing assets **CRITICAL**
- Test **firewall and network segmentation**; validate DMZ, VPC boundaries, and inter-segment access controls **CRITICAL**
- Assess **VPN / remote access** configuration, authentication strength, and split-tunneling risks **HIGH**
- Identify **unpatched services** and CVEs  $\geq 7.0$  CVSS on internet-facing hosts **HIGH**
- Validate **DNS security**: zone transfer restrictions, DNSSEC, dangling DNS records **MEDIUM**
- Test cloud infrastructure misconfigurations — S3 buckets, security groups, IAM role assignments **HIGH**

**03 APPLICATION SECURITY**

CC6.1 / CC6.6

- Test for **OWASP Top 10**: SQL injection, XSS, SSRF, XXE, insecure deserialization, IDOR **CRITICAL**
- Assess **authentication mechanisms** including brute force resistance, MFA bypass, session fixation **CRITICAL**
- Evaluate **API security**: authentication, rate limiting, excessive data exposure, BOLA/BFLA **HIGH**
- Validate **authorization controls** including privilege escalation, horizontal and vertical access violations **CRITICAL**
- Review **encryption in transit**: TLS version, cipher suites, certificate validity, HSTS enforcement **HIGH**
- Test for **secrets exposure** such as API keys, credentials, tokens in source/headers/error messages **HIGH**

**04 ACCESS CONTROLS & IDENTITY**

CC6.1 / CC6.2 / CC6.3

- Verify **least privilege enforcement** by testing ability to access data beyond assigned role scope **CRITICAL**
- Attempt **credential stuffing / password spray** against login endpoints; verify lockout policies **HIGH**
- Test **MFA implementation** for OTP reuse, bypass via account recovery flows, SIM-swap risk **HIGH**
- Validate **session management**: token entropy, expiry enforcement, logout invalidation **HIGH**
- Assess **privileged access**: admin console exposure, bastion host security, PAM controls **CRITICAL**
- Review **SSO/IdP configuration** for SAML assertion manipulation, OAuth token leakage **MEDIUM**

**05 DATA PROTECTION & ENCRYPTION**

CC6.7 / CC6.1

- Confirm **data at rest encryption**: database encryption, disk encryption on all systems in scope **CRITICAL**
- Test for **PII/sensitive data leakage** in logs, error messages, API responses, and debug endpoints **CRITICAL**
- Assess **key management** for hardcoded keys, insecure storage, key rotation enforcement **HIGH**
- Verify **data backup security**: backup encryption, access controls, off-site storage protections **MEDIUM**
- Check **third-party data sharing** via API integrations transmitting data to external services **MEDIUM**

**06 DETECTION & RESPONSE VALIDATION**

CC7.2 / CC7.3 / CC7.4

- Verify **SIEM/logging coverage** by confirming attack activity generates alerts during test window **HIGH**
- Confirm **IDS/IPS detection** by running known attack signatures to validate detection fidelity **HIGH**
- Test **incident response trigger**; notify IR team post-test; confirm they observed activity **CRITICAL**
- Validate **log retention**; confirm logs are immutable and retained per policy ( $\geq 90$  days for SOC 2) **HIGH**
- Assess **mean time to detect (MTTD)** and document detection gaps identified during engagement **MEDIUM**

## // SCOPE\_DOC

- Signed Rules of Engagement
- System description boundary map
- Methodology statement
- Tester credentials on file

## // FINDINGS\_REPORT

- Executive summary for mgmt
- Technical findings w/ CVSS scores
- Proof-of-concept for each finding
- Risk-ranked remediation list

## // REMEDIATION

- Findings tracked in issue system
- Owners assigned per finding
- SLA defined (Critical: 30d)
- Retest / validation performed

## // ATTESTATION

- Annual cadence documented
- Significant change re-testing
- Report shared with auditor
- Management sign-off on risk acceptance