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Swiss cloud provider comparison

Banking secrecy, client data and FINMA outsourcing rules

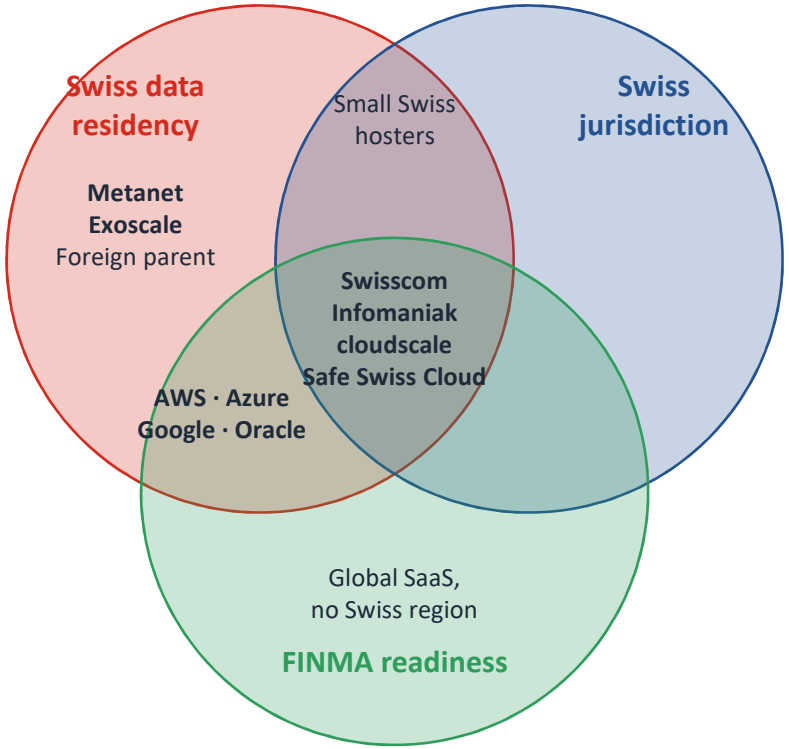
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Five rules that shape the decision

Banking secrecy Art. 47 Banking Act	Disclosing client data is a criminal offence; foreign access needs a client waiver or technical protection.
FINMA Circ. 2018/3 Outsourcing	Material functions and mass CID: due diligence, written contract, audit and access rights for FINMA.
FINMA Circ. 2023/1 Operational risk and resilience	Replaces the CID concept with bank client data and critical data, each needing confidentiality controls.
Revised FADP In force since 1 Sept 2023	Transfers abroad only to adequate countries or with safeguards; data subjects must be informed.
SBA Cloud Guidelines 3rd edition, Nov 2025	Industry practice on data classification, encryption, key management and foreign lawful access.

Who meets all three Swiss requirements?



Swiss data residency

Data, backups and what is needed to use them stay on Swiss soil

Swiss jurisdiction

Swiss-controlled provider with no foreign parent, so no US CLOUD Act reach

FINMA readiness

Published Circ. 2018/3 material, audit reports and audit rights

FINMA does not certify providers: the bank's own due diligence decides.

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Hyperscalers: Swiss regions, US parents

Provider	Swiss data centres	Jurisdiction	FINMA evidence	Fit for client data
AWS	Zurich (eu-central-2)	US parent, CLOUD Act	ISAE 3000 Type 2 FINMA report	**Only with Swiss-held keys**
Microsoft Azure	Switzerland North and West	US parent, CLOUD Act	FINMA compliance checklist	**Only with Swiss-held keys**
Google Cloud	Zurich (europe-west6)	US parent, CLOUD Act	ISAE 3000; contracts cover Circ. 2018/3	**Only with Swiss-held keys**
Oracle Cloud	Zurich region	US parent, CLOUD Act	FINMA contract checklist	**Only with Swiss-held keys**

Fit assumes mass bank client data (CID). Any provider can host non-client workloads.

Swiss and regional providers

Provider	Swiss data centres	Jurisdiction	FINMA evidence	Fit for client data
Swisscom	Own Swiss data centres	Swiss, majority federal-owned	Bank-focused cloud; ask for assurance report	**Strong candidate**
Infomaniak	Own Swiss data centres	Swiss-owned, Swiss law	ISO 27001, Circ. 2018/3 mapping	**Strong candidate**
cloudscale	Swiss-only infrastructure	Swiss company, Swiss law	ISO 27001/27017/27018, ISAE 3000	**Strong candidate**
Safe Swiss Cloud	Swiss data centres	Swiss, Everyware AG majority	ISO 27001/27017/27018; claims Circ. 2018/3	**Candidate, verify claims**
Exoscale	Swiss and EU data centres	Austrian parent (A1 Digital)	None found	**Request evidence first**
Metanet	Green data centres, ISO 27001	Swiss AG within group.one	None published	**Non-client data only**

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Want to know more?

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