

# Payment Card Industry (PCI) Data Security Standard

Attestation of Compliance for Onsite Assessments – Service Providers

Version 3.2

April 2016



# **Section 1: Assessment Information**

### Instructions for Submission

This Attestation of Compliance must be completed as a declaration of the results of the service provider's assessment with the *Payment Card Industry Data Security Standard Requirements and Security Assessment Procedures (PCI DSS).* Complete all sections: The service provider is responsible for ensuring that each section is completed by the relevant parties, as applicable. Contact the requesting payment brand for reporting and submission procedures.

| Part 1. Service Provider and Qualified Security Assessor Information |                 |                       |                          |                       |        |        |  |
|--|-----------------|-----------------------|--------------------------|-----------------------|--------|--------|--|
| Part 1a. Service Provider Organization Information                   |                 |                       |                          |                       |        |        |  |
| Company Name:  | Nets Estonia AS |                       | DBA (doing business as): | n/a                   |        |        |  |
| Contact Name:  | Paavo Sild      | Paavo Sild            |                          | Head of IT department |        |        |  |
| Telephone:   | +372 6711 477   | +372 6711 477         |                          | paavo.silo            | d@estc | ard.ee |  |
| Business Address:  | Tartu mnt 63    | Tartu mnt 63          |                          | Tallinn               |        |        |  |
| State/Province:  | Harju county    | Harju county Country: |                          |                       | Zip:   | 10115  |  |
| URL:   | www.nets.eu     |                       |                          |                       |        |        |  |
|  |                 |                       |                          |                       |        |        |  |

| Part 1b. Qualified Securi | ty Assessor Cor                        | npany Inforn | nation (if app          | plicable) |                                       |            |
|---------------------------|--|--------------|-------------------------|-----------|---------------------------------------|------------|
| Company Name:             | Foregenix                              | 1            |                         |           |                                       |            |
| Lead QSA Contact Name:    | Ariel Ben Harosh                       |              | Title:                  |           | Managing consultant<br>Foregenix Ltd. |            |
| Telephone:                | +44 845 309 62                         | :32          | E-mail:                 | abenharos | h@fore                                | egenix.com |
| Business Address:         | 1 <sup>st</sup> Floor, 8-9 High Street |              | City:                   | Marlborou | Marlborough                           |            |
| State/Province:           | Wiltshire                              | Country:     | Country: United Kingdom |           | Zip:                                  | SN8 1AA    |
| URL:                      | http://www.foreg                       | genix.com    |                         |           |                                       | ,          |
|                           |  |              |                         |           |                                       |            |



### Part 2. Executive Summary Part 2a. Scope Verification Services that were INCLUDED in the scope of the PCI DSS Assessment (check all that apply): Name of service(s) assessed: Issuing, Acquiring, 3D-Secure services Type of service(s) assessed: **Payment Processing: Hosting Provider:** Managed Services (specify): Applications / software Systems security services POS / card present Hardware IT support Internet / e-commerce Infrastructure / Network MOTO / Call Center Physical security Physical space (co-location) Terminal Management System Other services (specify): Other processing (specify): Storage Web Security services 3-D Secure Hosting Provider Shared Hosting Provider Other Hosting (specify): Fraud and Chargeback Payment Gateway/Switch Account Management **Back-Office Services** X Issuer Processing Prepaid Services **Billing Management** Loyalty Programs Records Management

Clearing and Settlement Merchant Services

Network Provider

Others (specify): data preparation

**Note**: These categories are provided for assistance only, and are not intended to limit or predetermine an entity's service description. If you feel these categories don't apply to your service, complete "Others." If you're unsure whether a category could apply to your service, consult with the applicable payment brand.

Tax/Government Payments



| Part 2a. Scope Verification (continued)   |   |   |  |  |  |  |  |  |
|---|---|---|--|--|--|--|--|--|
| Services that are provided by the service provider but were NOT INCLUDED in the scope of the PCI DSS Assessment (check all that apply):   |   |   |  |  |  |  |  |  |
| Name of service(s) not assessed:  | Not applicable  |   |  |  |  |  |  |  |
| Type of service(s) not assessed:  |   |   |  |  |  |  |  |  |
| Hosting Provider:<br>Applications / software<br>Hardware<br>Infrastructure / Network<br>Physical space (co-location)<br>Storage<br>Web<br>Security services<br>3-D Secure Hosting Provider<br>Shared Hosting Provider<br>Other Hosting (specify): | Managed Services (specify):          Systems security services         IT support         Physical security         Terminal Management System         Other services (specify):  | Payment Processing: <ul> <li>POS / card present</li> <li>Internet / e-commerce</li> <li>MOTO / Call Center</li> <li>ATM</li> <li>Other processing (specify):</li> </ul> |  |  |  |  |  |  |
| Account Management Back-Office Services Billing Management  | Fraud and Chargeback Issuer Processing Loyalty Programs   | Payment Gateway/Switch     Prepaid Services     Records Management  |  |  |  |  |  |  |
| Clearing and Settlement   | Merchant Services   | Tax/Government Payments   |  |  |  |  |  |  |
| <ul> <li>Network Provider</li> <li>Others (specify):</li> <li>Provide a brief explanation why an were not included in the assessme</li> </ul>   |   |   |  |  |  |  |  |  |
| Part 2b. Description of Paym  |   |   |  |  |  |  |  |  |
| Describe how and in what<br>capacity your business stores,<br>processes, and/or transmits<br>cardholder data.   | CARD BRANDS ACCEPTED:<br>- Visa<br>- MasterCard<br>- American Express<br>PROCESSING DETAILS<br>STORAGE DETAILS  |   |  |  |  |  |  |  |
| Describe how and in what<br>capacity your business is<br>otherwise involved in or has the<br>ability to impact the security of<br>cardholder data.  | Not applicable. The service assesservice asses | ed is not otherwise involved in the   |  |  |  |  |  |  |



### Part 2c. Locations

List types of facilities (for example, retail outlets, corporate offices, data centers, call centers, etc.) and a summary of locations included in the PCI DSS review.

| Type of facility:       | Number of facilities of this type | Location(s) of facility (city, country): |
|-------------------------|-----------------------------------|--|
| Example: Retail outlets | 3                                 | Boston, MA, USA                          |
| Corporate offices       | 1                                 | Tartu mnt 63, Tallinn, Estonia           |
| Primary data center     | 1                                 |  |
| Secondary data center   | 1                                 |  |
|                         |                                   |  |
|                         |                                   |  |

| Part 2d. Payment Applica   | tions          |                       |                                  |   |  |  |  |
|--|----------------|-----------------------|----------------------------------|---|--|--|--|
| Does the organization use one or more Payment Applications? Xes No                           |                |                       |                                  |   |  |  |  |
| Provide the following information regarding the Payment Applications your organization uses: |                |                       |                                  |   |  |  |  |
| Payment Application Name   | Version Number | Application<br>Vendor | Is application<br>PA-DSS Listed? | PA-DSS<br>Listing Expiry<br>date (if<br>applicable) |  |  |  |
| iPay   |                | Nets Estonia AS       | 🗌 Yes 🛛 No                       | Not Applicable                                      |  |  |  |
| MasterCard Incoming  |                | Nets Estonia AS       | 🗌 Yes 🛛 No                       | Not Applicable                                      |  |  |  |
| Kaartditehingute aruanded  |                | Nets Estonia AS       | 🗌 Yes 🛛 No                       | Not Applicable                                      |  |  |  |
| Autor_log  |                | Nets Estonia AS       | 🗌 Yes 🛛 No                       | Not Applicable                                      |  |  |  |
| Kviitungite sistetamine  |                | Nets Estonia AS       | 🗌 Yes 🛛 No                       | Not Applicable                                      |  |  |  |
| Autoriseerimata  |                | Nets Estonia AS       | 🗌 Yes 🛛 No                       | Not Applicable                                      |  |  |  |
| CardManager  | S.             | Nets Estonia AS       | 🗌 Yes 🛛 No                       | Not Applicable                                      |  |  |  |
| set of offline (clearing)  |                | Nets Estonia AS       | 🗌 Yes 🛛 No                       | Not Applicable                                      |  |  |  |
| amex_gw  | )              | Nets Estonia AS       | 🗌 Yes 🛛 No                       | Not Applicable                                      |  |  |  |
| visa_gw  |                | Nets Estonia AS       | 🗌 Yes 🛛 No                       | Not Applicable                                      |  |  |  |
| banknet_gw   |                | Nets Estonia AS       | 🗌 Yes 🛛 No                       | Not Applicable                                      |  |  |  |
| EMV UI ver.  |                | Nets Estonia AS       | 🗌 Yes 🛛 No                       | Not Applicable                                      |  |  |  |
| EMV Server   |                | Nets Estonia AS       | 🗌 Yes 🛛 No                       | Not Applicable                                      |  |  |  |
| РН   |                | Nets Estonia AS       | 🗌 Yes 🛛 No                       | Not Applicable                                      |  |  |  |
| 3D Secure ACS  |                | Nets Estonia AS       | 🗌 Yes 🛛 No                       | Not Applicable                                      |  |  |  |

| Part 2e. Description of Environment  |                                |  |  |  |  |
|--|--------------------------------|--|--|--|--|
| Provide a <u>high-level</u> description of the environment covered by this                         | Processor connections covered: |  |  |  |  |
| assessment.  | TECHNOLOGIES USED:             |  |  |  |  |
| <ul><li>For example:</li><li>Connections into and out of the cardholder data environment</li></ul> |                                |  |  |  |  |



| <ul> <li>(CDE).</li> <li>Critical system components<br/>within the CDE, such as POS<br/>devices, databases, web<br/>servers, etc., and any other<br/>necessary payment<br/>components, as applicable.</li> </ul> |       |  |
|--|-------|--|
| Does your business use network se<br>environment?  | Yes 🗌 |  |
| (Refer to "Network Segmentation" s segmentation)   | 140   |  |



| Part 2f. Third-Party Service Providers  |                                   |  |  |  |  |  |
|---|-----------------------------------|--|--|--|--|--|
| Does your company have a relationship with a Qualified Integrator & Reseller (QIR) for the purpose of the services being validated?   |                                   |  |  |  |  |  |
| If Yes:   |                                   |  |  |  |  |  |
| Name of QIR Company:  |                                   |  |  |  |  |  |
| QIR Individual Name:  |                                   |  |  |  |  |  |
| Description of services pr  | ovided by QIR:                    |  |  |  |  |  |
| Does your company have a relationship with one or more third-party service providers (for example, Qualified Integrator Resellers (QIR), gateways, payment processors, payment service providers (PSP), web-hosting companies, airline booking agents, loyalty program agents, etc.) for the purpose of the services being validated? |                                   |  |  |  |  |  |
| If Yes:   |                                   |  |  |  |  |  |
| Name of service provider:   | Description of services provided: |  |  |  |  |  |
| Client  | Transaction processing            |  |  |  |  |  |
| Client  | Transaction processing            |  |  |  |  |  |
| Client  | Transaction processing            |  |  |  |  |  |
| Client  | Transaction processing            |  |  |  |  |  |
| Client  | Transaction processing            |  |  |  |  |  |
| Client  | Transaction processing            |  |  |  |  |  |
| Client  | Transaction processing            |  |  |  |  |  |
| Client  | Transaction processing            |  |  |  |  |  |
| Client  | Transaction processing            |  |  |  |  |  |
| Client  | Transaction processing            |  |  |  |  |  |
| Client  | Data center                       |  |  |  |  |  |
| Note: Requirement 12.8 applies to all entities in this list.  |                                   |  |  |  |  |  |

### Part 2g. Summary of Requirements Tested

For each PCI DSS Requirement, select one of the following:

- **Full** The requirement and all sub-requirements of that requirement were assessed, and no sub-requirements were marked as "Not Tested" or "Not Applicable" in the ROC.
- **Partial** One or more sub-requirements of that requirement were marked as "Not Tested" or "Not Applicable" in the ROC.
- **None** All sub-requirements of that requirement were marked as "Not Tested" and/or "Not Applicable" in the ROC.

For all requirements identified as either "Partial" or "None," provide details in the "Justification for Approach" column, including:

• Details of specific sub-requirements that were marked as either "Not Tested" and/or "Not Applicable" in the ROC



• Reason why sub-requirement(s) were not tested or not applicable

**Note:** One table to be completed for each service covered by this AOC. Additional copies of this section are available on the PCI SSC website.

|                        | Name of Service Assessed: |                                  | Issuing, Acquiring, 3D-Secure services |   |  |
|------------------------|---------------------------|----------------------------------|--|---|--|
|                        |                           | Details of Requirements Assessed |  |   |  |
| PCI DSS<br>Requirement | Full                      | Partial                          | None                                   | Justification for Approach<br>(Required for all "Partial" and "None" responses. Identify which<br>sub-requirements were not tested and the reason.) |  |
| Requirement 1:         | $\square$                 |                                  |  |   |  |
| Requirement 2:         |                           | $\square$                        |  |   |  |
| Requirement 3:         |                           | $\square$                        |  |   |  |
| Requirement 4:         |                           | $\square$                        |  |   |  |
| Requirement 5:         | $\square$                 |                                  |  |   |  |
| Requirement 6:         | $\square$                 |                                  |  | xS  |  |
| Requirement 7:         | $\square$                 |                                  |  | <u> </u>  |  |
| Requirement 8:         |                           | $\square$                        |  |   |  |
| Requirement 9:         |                           | $\square$                        |  |   |  |
| Requirement 10:        | $\square$                 |                                  |  |   |  |
| Requirement 11:        | $\square$                 |                                  |  |   |  |
| Requirement 12:        | $\square$                 | D'                               |  |   |  |
| Appendix A1:           |                           |                                  | $\boxtimes$                            |   |  |
| Appendix A2:           | J)                        |                                  | $\boxtimes$                            |   |  |

2

# Section 2: Report on Compliance

This Attestation of Compliance reflects the results of an onsite assessment, which is documented in an accompanying Report on Compliance (ROC).

| The assessment documented in this attestation and in the ROC was completed on: | 2018-12-12 |    |
|--|------------|----|
| Have compensating controls been used to meet any requirement in the ROC?       | Yes        | No |
| Were any requirements in the ROC identified as being not applicable (N/A)?     | 🖂 Yes      | No |
| Were any requirements not tested?  | Yes        | No |
| Were any requirements in the ROC unable to be met due to a legal constraint?   | Yes        | No |
| Public version by Mets   |            |    |

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# **Section 3: Validation and Attestation Details**

### Part 3. PCI DSS Validation

### This AOC is based on results noted in the ROC dated 2018-12-12.

Based on the results documented in the ROC noted above, the signatories identified in Parts 3b-3d, as applicable, assert(s) the following compliance status for the entity identified in Part 2 of this document (*check one*):

| $\boxtimes$ | Compliant: All sections of the PCI DSS ROC are complete, all questions answered affirmatively,     |
|-------------|--|
|             | resulting in an overall COMPLIANT rating; thereby Nets Estonia AS has demonstrated full compliance |
|             | with the PCI DSS.  |

**Non-Compliant:** Not all sections of the PCI DSS ROC are complete, or not all questions are answered affirmatively, resulting in an overall **NON-COMPLIANT** rating, thereby (*Service Provider Company Name*) has not demonstrated full compliance with the PCI DSS.

Target Date for Compliance:

An entity submitting this form with a status of Non-Compliant may be required to complete the Action Plan in Part 4 of this document. *Check with the payment brand(s) before completing Part 4.* 

**Compliant but with Legal exception:** One or more requirements are marked "Not in Place" due to a legal restriction that prevents the requirement from being met. This option requires additional review from acquirer or payment brand.

*If checked, complete the following:* 

| Affected Requirement | Details of how legal constraint prevents requirement being met |  |
|----------------------|--|--|
|                      |  |  |
|                      |  |  |
|                      |  |  |

| Part   | Part 3a. Acknowledgement of Status  |  |  |  |
|--|---|--|--|--|
| Signatory(s) confirms:<br>(Check all that apply) |   |  |  |  |
|  | The ROC was completed according to the <i>PCI DSS Requirements and Security Assessment Procedures</i> , Version 3.2, and was completed according to the instructions therein. |  |  |  |
|  | All information within the above-referenced ROC and in this attestation fairly represents the results of my assessment in all material respects.                              |  |  |  |
|  | I have confirmed with my payment application vendor that my payment system does not store sensitive authentication data after authorization.                                  |  |  |  |
|  | I have read the PCI DSS and I recognize that I must maintain PCI DSS compliance, as applicable to my environment, at all times.   |  |  |  |

| $\square$ | If my environment changes, I recognize I must reassess my environment and implement any additional PCI DSS requirements that apply.  |  |  |
|-----------|--|--|--|
| Part      | Part 3a. Acknowledgement of Status (continued)   |  |  |
| $\square$ | No evidence of full track data <sup>1</sup> , CAV2, CVC2, CID, or CVV2 data <sup>2</sup> , or PIN data <sup>3</sup> storage after transaction authorization was found on ANY system reviewed during this assessment. |  |  |
| $\square$ | ASV scans are being completed by the PCI SSC Approved Scanning Vendor 403 Labs   |  |  |
|           |  |  |  |

### Part 3b. Service Provider Attestation

### Signed

| Signature of Service Provider Executive Officer $ earrow$ | Date:            |
|---|------------------|
| Service Provider Executive Officer Name:                  | Title:           |
| Paavo Sild  | Head of IT Dept. |
|   | .G*              |

 $\cdot \cap$ 

### Part 3c. Qualified Security Assessor (QSA) Acknowledgement (if applicable)

| If a QSA was involved or assisted with this | Lead QSA, planning, assessing systems, documentation, |
|---|---|
| assessment, describe the role performed:    | controls  |

## Signed

| Signature of Duly Authorized Officer of QSA Company ↑ | Date: 2018-12-12       |
|---|------------------------|
| Duly Authorized Officer Name: Ariel Ben-Harosh        | QSA Company: Foregenix |

### Part 3d. Internal Security Assessor (ISA) Involvement (if applicable)

| If an ISA(s) was involved or assisted with<br>this assessment, identify the ISA personnel<br>and describe the role performed: | Not Applicable |
|---|----------------|
|---|----------------|

<sup>&</sup>lt;sup>1</sup> Data encoded in the magnetic stripe or equivalent data on a chip used for authorization during a card-present transaction. Entities may not retain full track data after transaction authorization. The only elements of track data that may be retained are primary account number (PAN), expiration date, and cardholder name.

<sup>&</sup>lt;sup>2</sup> The three- or four-digit value printed by the signature panel or on the face of a payment card used to verify card-not-present transactions.

<sup>&</sup>lt;sup>3</sup> Personal identification number entered by cardholder during a card-present transaction, and/or encrypted PIN block present within the transaction message.

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### Part 4. Action Plan for Non-Compliant Requirements

Select the appropriate response for "Compliant to PCI DSS Requirements" for each requirement. If you answer "No" to any of the requirements, you may be required to provide the date your Company expects to be compliant with the requirement and a brief description of the actions being taken to meet the requirement.

Check with the applicable payment brand(s) before completing Part 4.

| PCI DSS<br>Requirement | Description of Requirement   | DSS Req     | nt to PCI<br>uirements<br>et One)<br>NO | Remediation Date and<br>Actions<br>(If "NO" selected for any<br>Requirement) |
|------------------------|--|-------------|---|--|
| 1                      | Install and maintain a firewall configuration to protect cardholder data                       | $\boxtimes$ |   |  |
| 2                      | Do not use vendor-supplied defaults for<br>system passwords and other security<br>parameters   | $\square$   |   |  |
| 3                      | Protect stored cardholder data   | $\boxtimes$ |   |  |
| 4                      | Encrypt transmission of cardholder data across open, public networks                           |             |   |  |
| 5                      | Protect all systems against malware<br>and regularly update anti-virus software<br>or programs | X           |   |  |
| 6                      | Develop and maintain secure systems and applications   | $\boxtimes$ |   |  |
| 7                      | Restrict access to cardholder data by business need to know                                    | $\square$   |   |  |
| 8                      | Identify and authenticate access to system components  | $\boxtimes$ |   |  |
| 9                      | Restrict physical access to cardholder data  | $\boxtimes$ |   |  |
| 10                     | Track and monitor all access to network resources and cardholder data                          | $\boxtimes$ |   |  |
| 11                     | Regularly test security systems and processes  | $\square$   |   |  |
| 12                     | Maintain a policy that addresses information security for all personnel                        | $\square$   |   |  |
| Appendix A1            | Additional PCI DSS Requirements for<br>Shared Hosting Providers                                | $\square$   |   |  |
| Appendix A2            | Additional PCI DSS Requirements for<br>Entities using SSL/early TLS                            | $\boxtimes$ |   |  |









