



Payment Card Industry (PCI) Data Security Standard

Attestation of Compliance for Onsite Assessments – Service Providers

Version 3.2.1

Revision 2

September 2022

Document Changes

Date	Version	Description
September 2022	3.2.1 Revision 2	Updated to reflect the inclusion of UnionPay as a Participating Payment Brand.

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:	CLOUDPAYMENTS, LLC		DBA (doing business as):	CloudPayments		
Contact Name:	Ivan Maniuk		Title:	Chief Information Security Officer (CISO)		
Telephone:	+7 (926) 720-43-63		E-mail:	i.maniuk@cp.ru		
Business Address:	Shukhov str., 14, bld. 11		City:	Moscow		
State/Province:	Moscow	Country:	Russia		Zip:	115162
URL:	cloudpayments.ru					

Part 1b. Qualified Security Assessor Company Information (if applicable)

Company Name:	Deiteriy Co. Ltd.				
Lead QSA Contact Name:	Vladimir Kovalev	Title:	Lead Information Security Engineer		
Telephone:	+7 (812) 361-61-55	E-mail:	vladimir.kovalev@deiteriy.com		
Business Address:	pr. Obukhovskoy Oborony 271A	City:	Saint Petersburg		
State/Province:	Saint Petersburg	Country:	Russia	Zip:	192012
URL:	deiteriy.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: E-commerce payment gateway

Type of service(s) assessed:

Hosting Provider:

- ☐ Applications / software
- ☐ Hardware
- ☐ Infrastructure / Network
- ☐ Physical space (co-location)
- ☐ Storage
- ☐ Web
- ☐ Security services
- ☐ 3-D Secure Hosting Provider
- ☐ Shared Hosting Provider
- ☐ Other Hosting (specify):

Managed Services (specify):

- ☐ Systems security services
- ☐ IT support
- ☐ Physical security
- ☐ Terminal Management System
- ☐ Other services (specify):

Payment Processing:

- ☐ POS / card present
- ☒ Internet / e-commerce
- ☐ MOTO / Call Center
- ☐ ATM
- ☐ Other processing (specify):

☐ Account Management

☐ Fraud and Chargeback

☒ Payment Gateway/Switch

☐ Back-Office Services

☐ Issuer Processing

☐ Prepaid Services

☐ Billing Management

☐ Loyalty Programs

☐ Records Management

☐ Clearing and Settlement

☐ Merchant Services

☐ Tax/Government Payments

☐ Network Provider

☐ Others (specify): Not Applicable.

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.

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: <input type="checkbox"/> Applications / software <input type="checkbox"/> Hardware <input type="checkbox"/> Infrastructure / Network <input type="checkbox"/> Physical space (co-location) <input type="checkbox"/> Storage <input type="checkbox"/> Web <input type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input type="checkbox"/> Shared Hosting Provider <input type="checkbox"/> Other Hosting (specify):	Managed Services (specify): <input type="checkbox"/> Systems security services <input type="checkbox"/> IT support <input type="checkbox"/> Physical security <input type="checkbox"/> Terminal Management System <input type="checkbox"/> Other services (specify):	Payment Processing: <input type="checkbox"/> POS / card present <input type="checkbox"/> Internet / e-commerce <input type="checkbox"/> MOTO / Call Center <input type="checkbox"/> ATM <input type="checkbox"/> Other processing (specify):
<input type="checkbox"/> Account Management <input type="checkbox"/> Back-Office Services <input type="checkbox"/> Billing Management <input type="checkbox"/> Clearing and Settlement <input type="checkbox"/> Network Provider	<input type="checkbox"/> Fraud and Chargeback <input type="checkbox"/> Issuer Processing <input type="checkbox"/> Loyalty Programs <input type="checkbox"/> Merchant Services	<input type="checkbox"/> Payment Gateway/Switch <input type="checkbox"/> Prepaid Services <input type="checkbox"/> Records Management <input type="checkbox"/> Tax/Government Payments
<input type="checkbox"/> Others (specify): Not Applicable.		

Provide a brief explanation why any checked services were not included in the assessment: Not Applicable.

Part 2b. Description of Payment Card Business

Describe how and in what capacity your business stores, processes, and/or transmits cardholder data.	<p>The Company is an e-commerce payment gateway, which processes transactions from e-commerce merchants. The Company receives, processes and transmits PAN, EXPDATE, CHNAME and CVV2/CVC2. The Company processes over 300 000 card-not-present transactions annually.</p> <p>The Company stores PANs for business purposes such as recurring transactions.</p> <p>To authorize payment transactions the Company sends requests to acquirers via secured channels</p>
Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data.	<p>There are no any other cases in which the Company is involved in or has the ability to impact the security of the cardholder data.</p>

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
Head office	1	Moscow, Russia

Part 2d. Payment Applications

Does the organization use one or more Payment Applications? ☒ Yes ☐ No

Provide the following information regarding the Payment Applications your organization uses:

Payment Application Name	Version Number	Application Vendor	Is application PA-DSS Listed?	PA-DSS Listing Expiry date (if applicable)
Widget CP	1.31	Self-developed	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not Applicable.
Processing API	1.351	Self-developed	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not Applicable.

Part 2e. Description of Environment

Provide a **high-level** description of the environment covered by this assessment.

For example:

- Connections into and out of the cardholder data environment (CDE).
- Critical system components within the CDE, such as POS devices, databases, web servers, etc., and any other necessary payment components, as applicable.

The Company's information infrastructure under assessment is located in data-center Dataline and Yandex.Cloud.

The Company's information infrastructure under assessment is divided into segments and segregated from other Company's infrastructure not included in the scope of the assessment.

The CHD is stored securely in the databases located in internal network segment. Stored CHD protected by strong cryptography.

Transactions are transmitted via secured channels also protected by strong cryptography.

System components that could impact the security of CHD: network devices, application servers, databases.

Does your business use network segmentation to affect the scope of your PCI DSS environment?

(Refer to "Network Segmentation" section of PCI DSS for guidance on network segmentation)

☒ Yes ☐ No

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? ☐ Yes ☒ No

If Yes:

Name of QIR Company:	Not Applicable.
QIR Individual Name:	Not Applicable.
Description of services provided by QIR:	Not Applicable.

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? ☒ Yes ☐ No

If Yes:

Name of service provider:	Description of services provided:
DataLine, LLC	Co-location hosting provider.
Yandex.Cloud, LLC	Third-party cloud hosting.
Yandex LLC, Yandex Pay	Transactions processing.
JSC Tinkoff Bank	Transactions processing.
PJSC RNCB	Transactions processing.
JSC "Alfa-Bank"	Transactions processing.
CJSC "Alfa-Bank"	Transactions processing.
PJSC MTS Bank	Transactions processing.
Sberbank	Transactions processing.
SmartProcessing, LLC	Transactions processing.
Armenian Card (ARCA) CJSC	Transactions processing.
Worldline SA	Transactions processing.
MultiCarta Ltd.	Transactions processing.
JSC "Russian Standard Bank"	Transactions processing.
AzeriCard Ltd.	Transactions processing.
eComCharge LLC	Transactions processing.
First Heartland Jusan Bank	Transactions processing.
JSCB "KAPITALBANK"	Transactions processing.
QIWI Bank, JSC	Transactions processing.
JSC Bank CenterCredit	Transactions processing.

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: E-commerce payment gateway

PCI DSS Requirement	Details of Requirements Assessed			Justification for Approach (Required for all “Partial” and “None” responses. Identify which sub-requirements were not tested and the reason.)
	Full	Partial	None	
Requirement 1:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1.2.3 – Not applicable. There are no wireless networks in the scope of the assessment.
Requirement 2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2.1.1 – Not Applicable. No any wireless environments are connected to the cardholder data environment and no cardholder data is being transmitted over wireless networks. 2.2.3 – Not Applicable. There are no any insecure services, daemons, or protocols are enabled. 2.6 – Not Applicable. Assessed entity is not a shared hosting provider.
Requirement 3:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3.4.1 - Not Applicable - disk encryption is not used.
Requirement 4:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4.1.1 – Not Applicable. There are no wireless networks transmitting cardholder data or connected to the cardholder data environment.
Requirement 5:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 6:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 7:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 8:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8.5.1 – Not Applicable. The Company has no remote access to customer premises.

Requirement 9:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	From 9.9 to 9.9.3 - Not Applicable -There are no card reading devices in the scope of assessment. The Company processes only card-non-present transactions
Requirement 10:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 11:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 12:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	From 12.3 to 12.3.10 - Not Applicable - the Company does not implement critical technologies in its information infrastructure.
Appendix A1:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Applicable. The Company is not a shared hosting provider.
Appendix A2:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Applicable. The Company doesn't use SSL/early TLS.

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:	June 02, 2023	
Have compensating controls been used to meet any requirement in the ROC?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Were any requirements in the ROC identified as being not applicable (N/A)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Were any requirements not tested?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Were any requirements in the ROC unable to be met due to a legal constraint?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Section 3: Validation and Attestation Details

Part 3. PCI DSS Validation

This AOC is based on results noted in the ROC dated *June 02, 2023*.

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*):

☒ **Compliant:** All sections of the PCI DSS ROC are complete, all questions answered affirmatively, resulting in an overall **COMPLIANT** rating; thereby *CLOUDPAYMENTS, LLC* 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: Not Applicable.

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
Not Applicable.	Not Applicable.
Not Applicable.	Not Applicable.

Part 3a. Acknowledgement of Status

Signatory(s) confirms:

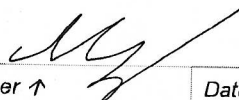
(*Check all that apply*)

- ☒ The ROC was completed according to the *PCI DSS Requirements and Security Assessment Procedures*, Version 3.2.1, 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.
- ☒ If my environment changes, I recognize I must reassess my environment and implement any additional PCI DSS requirements that apply.

Part 3a. Acknowledgement of Status (continued)

- ☒ No evidence of full track data¹, CAV2, CVC2, CVN2, CVV2, or CID data², or PIN data³ storage after transaction authorization was found on ANY system reviewed during this assessment.
- ☒ ASV scans are being completed by the PCI SSC Approved Scanning Vendor *Qualys, Inc.*

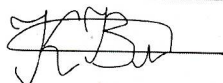
Part 3b. Service Provider Attestation

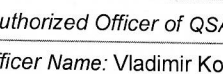
Signature of Service Provider Executive Officer  Date: June 02, 2023

Service Provider Executive Officer Name: Ivan Maniuk Title: Chief Information Security Officer (CISO)

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

If a QSA was involved or assisted with this assessment, describe the role performed: Assessor



Signature of Duly Authorized Officer of QSA Company  Date: June 02, 2023

Duly Authorized Officer Name: Vladimir Kovalev QSA Company: Deiteriy Co. Ltd.

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

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

¹ 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.

² 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.

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

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

