



Payment Card Industry (PCI) Data Security Standard

Attestation of Compliance for Onsite Assessments – Service Providers

Version 3.2.1

June 2018



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:	PayU Spolka Akcyjna	DBA (doing business as):	PayU SA PayU S.A. PayU SA Poland		
Contact Name:	Marcin Suś	Title:	Chief Information Security Officer		
Telephone:	+48 512 084 427	E-mail:	marcin.sus@payu.com		
Business Address:	Ul. Grunwaldzka 186	City:	Poznan		
State/Province:	Poznan	Country:	Poland	Zip:	60-166
URL:	www.payu.com				

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

Company Name:	Advantio Ltd				
Lead QSA Contact Name:	Valentin Averin	Title:	Senior Consultant		
Telephone:	+380953564646	E-mail:	valentin.averin@advantio.com		
Business Address:	Block 4, Harcourt Centre Harcourt Road	City:	Dublin		
State/Province:	N/A	Country:	Ireland	Zip:	2
URL:	www.advantio.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:	Payment Gateway	
Type of service(s) 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 checked="" 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 checked="" type="checkbox"/> Fraud and Chargeback	<input checked="" type="checkbox"/> Payment Gateway/Switch
<input type="checkbox"/> Back-Office Services	<input type="checkbox"/> Issuer Processing	<input type="checkbox"/> Prepaid Services
<input type="checkbox"/> Billing Management	<input type="checkbox"/> Loyalty Programs	<input type="checkbox"/> Records Management
<input type="checkbox"/> Clearing and Settlement	<input type="checkbox"/> Merchant Services	<input type="checkbox"/> Tax/Government Payments
<input type="checkbox"/> Network Provider		
<input checked="" type="checkbox"/> Others (specify): Anti-fraud and chargeback teams (acquirer function) have access to transaction processing systems (service provider function) in order to use transactional data when needed for fraud investigations and chargeback processes. Access controls are in place to restrict access and allow users read only one credit card number per minute. There is also a process in place which monitors the Anti-Fraud department's access to cardholder data. The control of access to transaction systems by these acquirer functions is considered in scope of the service provider entity since access is controlled by PayU, therefore this was assessed as part of the current assessment.		
<p>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.</p>		


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:

- 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):

- | | | |
|--|---|--|
| <input type="checkbox"/> Account Management | <input type="checkbox"/> Fraud and Chargeback | <input type="checkbox"/> Payment Gateway/Switch |
| <input type="checkbox"/> Back-Office Services | <input type="checkbox"/> Issuer Processing | <input type="checkbox"/> Prepaid Services |
| <input type="checkbox"/> Billing Management | <input type="checkbox"/> Loyalty Programs | <input type="checkbox"/> Records Management |
| <input type="checkbox"/> Clearing and Settlement | <input type="checkbox"/> Merchant Services | <input type="checkbox"/> Tax/Government Payments |
| <input type="checkbox"/> Network Provider | | |
| <input type="checkbox"/> Others (specify): | | |

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

Part 2b. Description of Payment Card Business

Describe how and in what capacity your business stores, processes, and/or transmits cardholder data.

PayU Spolka Akcyjna, PayU S.A., PayU SA Poland (hereafter PayU), is a Level 1 Service Provider, that provides a payment gateway service to their clients through a web-based / e-commerce transactions on behalf of merchants.

PayU collects the cardholder information, PAN, expiry date CCV2/CVC2/CAV2/CID and Cardholder name; which it uses to process payments through an acquirer channel. PayU provides this capability as a service to any online merchants who would like to receive payment for Card-Not-Present e-commerce transactions.

Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data.

PayU as a service provider provides Internet Payment Processing facilities to merchants, enabling them to accept credit card information online collecting CHD and SAD to process e-commerce transactions.



PayU IT Staff manages infrastructure and security for other PayU locations. These services are provided for: Russia, Romania and the Netherlands.

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):
<i>Example: Retail outlets</i>	3	<i>Boston, MA, USA</i>
PayU S.A. Corporate Office	1	Poznan, Poland
PayU S.A. Corporate Office	1	Warsaw, Poland
PayU S.A. Datacenter	1	Poznan, Poland
PayU S.A. Datacenter	1	Krakow, Poland

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)
PayCard (Single Platform)	1.x	PayU	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	N/A
Card Keeper	1.x	PayU	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	N/A
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	

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.*

Payment card information is stored using tokenization and AES 256 encryption by the PayCard (Single Platform) software in Card Keeper and PayU Application databases.

PayCard (Single Platform) is an in-house development solution and is only deployed on PayU infrastructure.

HSM hardware devices are deployed at each of PayU SA Poland data sites to



support encryption key management for key used to encrypt cardholder data stored with PayCard (Single Platform) application.

Fraud and Chargeback teams have access to transaction processing systems, in order to use transactional data than required for Fraud and chargeback investigation.

PAN access is limited with masked information and access controls.

<p>Does your business use network segmentation to affect the scope of your PCI DSS environment? <i>(Refer to "Network Segmentation" section of PCI DSS for guidance on network segmentation)</i></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
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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:

N/A

QIR Individual Name:

N/A

Description of services provided by QIR:

N/A

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:
SIA Central Europe cPlc	Payment Processor providing transaction services to PayU Spolka Akcyjna.(PayU S.A. Poland).
MIH PayU B.V.	Managed Services, Corporate Global Polices
Akamai Technologies	Web Application Firewall provider
Allegro Group	Hosting Managed services (Collocation)
Feedzai	Anti-Fraud solution

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:	Card-not-present payment processing (Internet/e-commerce) Tokenization/vault services (as merchant)			
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2.1.1 is N/A: There are no Wireless networks in scope. 2.2.3 is N/A: There are no insecure services, daemons or protocols are enabled. 2.6 is N/A: The entity is not a Shared Hosting provider.
Requirement 3:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3.4.1 is N/A: Disk encryption is not used.
Requirement 4:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4.1.1 is N/A: There are no Wireless networks in scope.
Requirement 5:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 6:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	6.4.6 is N/A: There have been no significant changes during the last 12 month.
Requirement 7:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 8:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8.1.5 is N/A: Third parties do not have access to CDE.



Requirement 9:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	9.5, 9.5.1, 9.6.X, 9.7.X, and 9.8.X are N/A: The entity is not using physical backup media. 9.9.X are N/A: The entity is not managing card reading devices.
Requirement 10:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 11:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	11.2.3 is N/A: No significant changes were made to CDE within last 12 months.
Requirement 12:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Appendix A1:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	A1 is N/A: The entity is not a Shared Hosting provider.
Appendix A2:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	A2 is N/A: SSL/early TLS are not utilized.



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:	03 June 2022
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 3 June 2022.

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**):

<input checked="" type="checkbox"/>	<p>Compliant: All sections of the PCI DSS ROC are complete, all questions answered affirmatively, resulting in an overall COMPLIANT rating; thereby PayU Spolka Akcyjna has demonstrated full compliance with the PCI DSS.</p>						
<input type="checkbox"/>	<p>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 <i>(Service Provider Company Name)</i> has not demonstrated full compliance with the PCI DSS.</p> <p>Target Date for Compliance:</p> <p>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. <i>Check with the payment brand(s) before completing Part 4.</i></p>						
<input type="checkbox"/>	<p>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.</p> <p><i>If checked, complete the following:</i></p> <table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 35%;">Affected Requirement</th> <th>Details of how legal constraint prevents requirement being met</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Affected Requirement	Details of how legal constraint prevents requirement being met				
Affected Requirement	Details of how legal constraint prevents requirement being met						

Part 3a. Acknowledgement of Status

Signatory(s) confirms:

(Check all that apply)

<input checked="" type="checkbox"/>	The ROC was completed according to the <i>PCI DSS Requirements and Security Assessment Procedures</i> , Version 3.2.1, and was completed according to the instructions therein.
<input checked="" type="checkbox"/>	All information within the above-referenced ROC and in this attestation fairly represents the results of my assessment in all material respects.
<input checked="" type="checkbox"/>	I have confirmed with my payment application vendor that my payment system does not store sensitive authentication data after authorization.
<input checked="" type="checkbox"/>	I have read the PCI DSS and I recognize that I must maintain PCI DSS compliance, as applicable to my environment, at all times.
<input checked="" type="checkbox"/>	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)

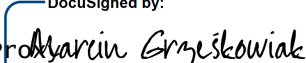
<input checked="" type="checkbox"/>	No evidence of full track data ¹ , CAV2, CVC2, CID, or CVV2 data ² , or PIN data ³ storage after transaction authorization was found on ANY system reviewed during this assessment.
<input checked="" type="checkbox"/>	ASV scans are being completed by the PCI SSC Approved Scanning Vendor Tenable Network Security

Part 3b. Service Provider Attestation

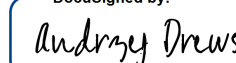
Marcin Grześkowiak

DocuSigned by:

Commercial Proxy


7C9CA8F728684CE...

DocuSigned by:


BEA0563C4F24431...

Signature of Service Provider Executive Officer ↑

Date: 3 June 2022

Service Provider Executive Officer Name: Andrzej Drews

Title: Commercial Proxy

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

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

Independent PCI QSA assessing PayU for the services described in this document.

DocuSigned by:


ABA9DEC3FF57486...

Signature of Duly Authorized Officer of QSA Company ↑

Date: 3 June 2022

Duly Authorized Officer Name: Martin Petrov

QSA Company: Advantio 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:

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"/>	

