

Payment Card Industry Data Security Standard

Attestation of Compliance for Report on Compliance – Service Providers

Version 4.0

Revision 2

Publication Date: August 2023



PCI DSS v4.0 Attestation of Compliance for Report on Compliance – Service Providers

Entity Name: PayU Spolka Akcyjna (dba: PayU SA, PayU SA, PayU SA Poland)

Assessment End Date: 28 May 2024

Date of Report as noted in the Report on Compliance: 29 May 2024



Section 1: Assessment Information

Instructions for Submission

This Attestation of Compliance (AOC) must be completed as a declaration of the results of the service provider's assessment against the *Payment Card Industry Data Security Standard (PCI DSS) Requirements and Testing Procedures ("*Assessment"). Complete all sections. The service provider is responsible for ensuring that each section is completed by the relevant parties, as applicable. Contact the entity(ies) to which this AOC will be submitted for reporting and submission procedures.

This AOC reflects the results documented in an associated Report on Compliance (ROC). Associated ROC sections are noted in each AOC Part/Section below.

Capitalized terms used but not otherwise defined in this document have the meanings set forth in the PCI DSS Report on Compliance Template.

Part 1. Contact Informatio	n
Part 1a. Assessed Entity (ROC Section 1.1)	
Company name:	PayU Spolka Akcyjna
DBA (doing business as):	PayU SA PayU S.A. PayU SA Poland
Company mailing address:	Ul. Grunwaldzka 186, Poznan, Poland. 60-166
Company main website:	www.payu.com
Company contact name:	Szymon Jazy
Company contact title:	Chief Information Security Officer
Contact phone number:	+48 795 576 075
Contact e-mail address:	szymon.jazy@payu.com
Part 1b. Assessor	'

Part 1b. Assessor (ROC Section 1.1)

Provide the following information for all assessors involved in the Assessment. If there was no assessor for a given assessor type, enter Not Applicable.

PCI SSC Internal Security Assessor(s)			
ISA name(s):	Not Applicable		
Qualified Security Assessor			
Company name:	INTEGRITY360 EUROPE LIMITED		
Company mailing address:	Termini, 3 Arkle Road, Sandyford Business Park, Sandyford, Dublin 18, D18 T6T7, Ireland		
Company website:	www.integrity360.com		
Lead Assessor name:	Yuriy Koshak		
Assessor phone number:	+38 093 029 80 79		



Assessor e-mail address:	yuriy.koshak@integrity360.com	
Assessor certificate number:	206-328	
Part 2. Executive Summary		
Part 2a. Scope Verification		
Services that were <u>INCLUDED</u> in the	scope of the Assessment (select all	that apply):
Name of service(s) assessed:	Payment Gateway Tokenization/vault services	
Type of service(s) assessed:		
Hosting Provider: Applications / software Hardware Infrastructure / Network Physical space (co-location) Storage Web-hosting services Security services 3-D Secure Hosting Provider Multi-Tenant Service Provider Other Hosting (specify):	Managed Services: ☐ Systems security services ☐ IT support ☐ Physical security ☐ Terminal Management System ☐ Other services (specify):	Payment Processing: ☐ POI / 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): Card tokenization/	vault services (when operating as a me	rchant)
Note: These categories are provided for service description. If these categories whether a category could apply to the a submitted.	do not apply to the assessed service, c	complete "Others." If it is not clear



Part 2. Executive Summary (continued) Part 2a. Scope Verification (continued) Services that are provided by the service provider but were NOT INCLUDED in the scope of the Assessment (select all that apply): Name of service(s) not assessed: Aquirer Type of service(s) not assessed: **Hosting Provider: Managed Services: Payment Processing:** ☐ Applications / software ☐ Systems security services ☐ POI / card present ☐ Hardware ☐ IT support ☐ Internet / e-commerce ☐ Infrastructure / Network ☐ Physical security ☐ Physical space (co-location) ☐ Terminal Management System \square ATM ☐ Storage Other services (specify): ☐ Other processing (specify): ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Other Hosting (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 ☐ Tax/Government Payments □ Network Provider Others (specify): Acquiring Provide a brief explanation why any checked services PayU performs some services as an acquiring member but these are considered outside the scope were not included in the Assessment: for this assessment Part 2b. Description of Role with Payment Cards (ROC Section 2.1) PayU Spolka Akcyina, PayU S.A., PayU SA Poland Describe how the business stores, processes, and/or (hereafter PayU), is a Level 1 Service Provider, that transmits account data. 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, cardholder name, expiry date and CVV/CVC; 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 ecommerce transactions.
Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.	Not Applicable
Describe system components that could impact the security of account data.	AWS WAF, Feedzai (Anti-Fraud Platform)



Part 2. Executive Summary (continued)

Part 2c. Description of Payment Card 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 POI devices, databases, web servers, etc., and any other necessary payment components, as applicable.
- System components that could impact the security of account data.

PayU hosts their PCI DSS environment at 2 Datacenters in Poland.

The CDE consists of the Linux based Application, Data Base (Oracle managed) and management servers.

Network Security Controls are realized by Load Balancers (F5) and firewalls (Juniper).

Segmentation in PayU is implemented between data centers and office network via usage of VLANs, connections between the data centers are implemented via usage of IP SEC or MPLS tunnels. Office network is segmented in order to secure the CDE delivered by the third party (Allegro Group).

Connections to the CDE are provided only through a "jump station" accessible from a VLAN segmented from the rest of the office network. Access to the "jump station" is possible using multiple authentication methods since it is considered to provide remote access to the CDE.

Access controls based on IPA LDAP management, Okta with usage of 2FA mechanisms.

Security is controlled using SOAR realized on the stack of Splunk, ElasticSearch and thirdparty applications, like Kibana, Google Authenticator, CrowdStrike/ClamAV (AV solutions on workstations).

Traffic to Payment applications (PayCard (Single Platform) and CardKeeper) is controlled via AWS WAF services.

Indicate whether the environment includes segmentation to reduce the scope of the Assessment.	⊠ Yes	☐ No
(Refer to the "Segmentation" section of PCI DSS for guidance on segmentation)		

Part 2d. In-Scope Locations/Facilities (ROC Section 4.6)

List all types of physical locations/facilities (for example, corporate offices, data centers, call centers and mail rooms) in scope for this Assessment.

Facility Type	Total Number of Locations (How many locations of this type are in scope)	Location(s) of Facility (city, country)
Example: Data centers	3	Boston, MA, USA



Corporate Office	1	Poznan, Poland
Corporate Office	1	Warsaw, Poland
Datacenter	1	Poznan, Poland
Datacenter	1	Krakow, Poland



Part 2. Executive Summary (continued)

Part 2e. PCI SSC Validated Products and Solutions (ROC Section 3.3)

Does the entity use any item identified on any PCI SSC Lists of Validated Products and Solutions*?
☐ Yes No
Provide the following information annualized each item the patitive configuration POLICON Lists of Validated

Provide the following information regarding each item the entity uses from PCI SSC's Lists of Validated Products and Solutions:

Name of PCI SSC- validated Product or Solution	Version of Product or Solution	PCI SSC Standard to which Product or Solution Was Validated	PCI SSC Listing Reference Number	Expiry Date of Listing
N/A	N/A	N/A	N/A	YYYY-MM-DD
				YYYY-MM-DD

For purposes of this document, "Lists of Validated Products and Solutions" means the lists of validated products, solutions, and/or components appearing on the PCI SSC website (www.pcisecuritystandards.org)—for example, 3DS Software Development Kits, Approved PTS Devices, Validated Payment Software, Payment Applications (PADSS), Point to Point Encryption (P2PE) solutions, Software-Based PIN Entry on COTS (SPoC) solutions, and Contactless Payments on COTS (CPoC) solutions.



Part 2f. Third-Party Service Providers

(ROC Section 4.4)			
For the services being validated, does the er that:	ntity have relationships with one or more third-party	y service providers	
	on the entity's behalf (for example, payment service providers (PSPs, and off-site storage))	⊠ Yes □ No	
	the entity's Assessment (for example, via alware services, security incident and event nters, web-hosting companies, and laaS, PaaS,	⊠ Yes □ No	
Could impact the security of the entity's C remote access, and/or bespoke software	CDE (for example, vendors providing support via developers).	⊠ Yes □ No	
If Yes:			
Name of Service Provider:	Description of Services Provided:		
NEXI Central Europe a.s.	Payment Processor providing transaction services to PayU Spolka Akcyjna.(PayU S.A. Poland).		
AWS (CloudFront)	Web Application Firewall provider		
ZooZ Mobile LTD Runtime environment backup connection solution to Visa and M networks			
Allegro Group Hosting Managed services (Collocation)			
Feedzai	Anti-Fraud services		
Note: Requirement 12.8 applies to all entitie	s in this list.		



Part 2. Executive Summary (continued)

Part 2g. Summary of Assessment (ROC Section 1.8.1)

Indicate below all responses provided within each principal PCI DSS requirement.

For all requirements identified as either "Not Applicable" or "Not Tested," complete the "Justification for Approach" table below.

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	Requirement Finding More than one response may be selected for a given requirement. Indicate all responses that apply.			Select If Below Method(s) Was Used		
	In Place	Not Applicable	Not Tested	Not in Place	Customized Approach	Compensating Controls
Requirement 1:	\boxtimes	\boxtimes				
Requirement 2:	\boxtimes					
Requirement 3:	\boxtimes	\boxtimes				
Requirement 4:	\boxtimes	\boxtimes				
Requirement 5:	\boxtimes	\boxtimes				
Requirement 6:	\boxtimes	\boxtimes				
Requirement 7:	\boxtimes					
Requirement 8:	\boxtimes	\boxtimes				
Requirement 9:	\boxtimes	\boxtimes				
Requirement 10:	\boxtimes					
Requirement 11:	\boxtimes	\boxtimes				
Requirement 12:	\boxtimes	\boxtimes				
Appendix A1:		\boxtimes				
Appendix A2:		\boxtimes				
Justification for Approach						



For any Not Applicable responses, identify which subrequirements were not applicable and the reason.

- 1.2.6 N/A: There are no insecure services and protocols.
- 2.2.5 N/A: There are no insecure services, daemons or protocols are enabled.
- 2.3(2.3.1, 2.3.2) N/A: There are no Wireless networks in scope.
- 3.3.1.1 N/A: Entity doesn't operate on card-present transactions.
- 3.3.1.3 N/A: Entity doesn't operate on card-present transactions.
- 3.3.3 N/A: The entity does not provide or support any issuing services.
- 3.4.2 N/A: There is no possibility for anyone to copy or relocate PAN data.
- 3.5.1.1 N/A: Requirements are future dated and are best practice till 31 March 2025.
- 3.5.1.2, 3.5.1.3 N/A: Disk encryption is not used.
- 3.7.9 N/A: Entity does not share cryptographic keys with its customers.
 - 4.2.1.2 N/A: There are no Wireless networks in scope.
- 4.2.2 N/A: Full PANs are not used in communications via end-user messaging technologies.
- 5.2.3, 5.2.3.1 N/A: There are no system components that are not at risk for malware. Anti-malware solutions monitor all components of the CDE.
- 6.3.2 N/A: Requirement is future dated and is best practice till 31 March 2025.
- 6.4.3 N/A: Requirement is future dated and is best practice till 31 March 2025.
- 6.5.2 N/A: There have been no significant changes during the last 12 months.
 - 8.2.2 N/A: Entity does not use group, shared or generic authentication credentials.
- 8.2.3 N/A: Entity does not have remote access to customer premises.
- 8.2.7 N/A: Third parties do not have access to CDE.
- 8.3.6 N/A: Requirement is future dated and is best practice till 31 March 2025.
- 9.2.3 N/A: There are no Wireless points or devices connected in the CDE.
- 9.4(9.4.1- 9.4.7) N/A: Entity is not using physical backup media.
 - 9.5(9.5.1, 9.5.1.1- 9.5.1.3) N/A: Entity is not managing card reading devices.
 - 11.3.1.3 N/A: There have been no significant changes during the last 12 months.
 - 11.3.2.1 N/A: There have been no significant changes during the last 12 month.
- 11.4.7 N/A: Entity is not a multi-tenant provider.
- 11.6(11.6.1) N/A: Requirement is future dated and is best practice till 31 March 2025.



	12.3.2 N/A: There are no any requirements met by entity with the Customized Approach identified.
	12.5.3 N/A: There have been no significant changes during the last 12 months.
	A1 N/A: The entity is not a Shared Hosting provider.
	A2 N/A: SSL/early TLS are not utilized.
	A3 N/A: There are no any requirements met by entity with the Customized Approach identified.
For any Not Tested responses, identify which sub- requirements were not tested and the reason.	Not Applicable



Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3.2)

Date Assessment began:	21 March 2024		
Note: This is the first date that evidence was g			
Date Assessment ended:	28 May 2024		
Note: This is the last date that evidence was g			
Were any requirements in the ROC unable to b	☐ Yes ⊠ No		
Were any testing activities performed remotely	⊠ Yes □ No		
If yes, for each testing activity below, indicate were performed:			
Examine documentation	⊠ Yes	☐ No	
Interview personnel	⊠ Yes	□No	
Examine/observe live data		□No	
Observe process being performed	⊠ Yes	□No	
Observe physical environment	⊠ Yes	□ No	
Interactive testing	⊠ Yes	☐ No	
Other: Not Applicable	☐ Yes	☐ No	



Section 3 Validation and Attestation Details

Part 3. PCI DSS Validation (ROC Section 1.7)

	`					
This 2024,		in the ROC dated (Date of Report as noted in the ROC 29 May				
Indica	ate below whether a full or partial	PCI DSS assessment was completed:				
	III Assessment – All requiremen Not Tested in the ROC.	ts have been assessed and therefore no requirements were marked				
		e requirements have not been assessed and were therefore marked uirement not assessed is noted as Not Tested in Part 2g above.				
as ap		ne ROC noted above, each signatory identified in any of Parts 3b-3d, compliance status for the entity identified in Part 2 of this document				
	Compliant: All sections of the PCI DSS ROC are complete, and all assessed requirements are marked as being either In Place or Not Applicable, resulting in an overall COMPLIANT rating; thereby PayU Spolka Akcyjna has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above.					
	Non-Compliant: Not all sections of the PCI DSS ROC are complete, or one or more requirements are marked as Not in Place, resulting in an overall NON-COMPLIANT rating; thereby (Service Provider Company Name) has not demonstrated compliance with PCI DSS requirements.					
	Target Date for Compliance: Y'	YYY-MM-DD				
	An entity submitting this form with a Non-Compliant status may be required to complete the Action Plan in Part 4 of this document. Confirm with the entity to which this AOC will be submitted before completing Part 4.					
	Compliant but with Legal exception: One or more assessed requirements in the ROC are marked as Not in Place due to a legal restriction that prevents the requirement from being met and all other assessed requirements are marked as being either In Place or Not Applicable, resulting in an overall COMPLIANT BUT WITH LEGAL EXCEPTION rating; thereby (Service Provider Company Name) has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above or as Not in Place due to a legal restriction.					
	This option requires additional re	eview from the entity to which this AOC will be submitted.				
	If selected, complete the following:					
	Affected Requirement	Details of how legal constraint prevents requirement from being met				



Part 3. PCI DSS Validation (continued) Part 3a. Service Provider Acknowledgement Signatory(s) confirms: (Select all that apply) The ROC was completed according to PCI DSS, Version 4.0 and was completed according to the instructions therein. \boxtimes All information within the above-referenced ROC and in this attestation fairly represents the results of the Assessment in all material respects. PCI DSS controls will be maintained at all times, as applicable to the entity's environment. \boxtimes Part 3b. Service Provider Attestation ysztot Gawrolledrein Grzeskowiak Signature of Service Provider Executive Officer Date: 29 May 2024 Service Provider Executive Officer Name: Krzysztof Gawronek Title: Member of the Board Marcin Grześkowiak Commercial Proxy Part 3c. Qualified Security Assessor (QSA) Acknowledgement If a QSA was involved or assisted with this ☑ QSA performed testing procedures. Assessment, indicate the role performed: ☐ QSA provided other assistance. If selected, describe all role(s) performed: Not Applicable Signature of Lead QSA Date: 29 May 2024 Lead QSA Name: Yuriy Koshak ocuSigned by: Signature of Duly Authorized Officer of QSA Company 1 Date: 29 May 2024 QSA Company: INTEGRITY360 EUROPE Duly Authorized Officer Name: Martin Petrov LIMITED Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement ☐ ISA(s) performed testing procedures. If an ISA(s) was involved or assisted with this Assessment, indicate the role performed: ☐ ISA(s) provided other assistance. If selected, describe all role(s) performed: Not Applicable



Part 4. Action Plan for Non-Compliant Requirements

Only complete Part 4 upon request of the entity to which this AOC will be submitted, and only if the Assessment has Non-Compliant results noted in Section 3.

If asked to complete this section, select the appropriate response for "Compliant to PCI DSS Requirements" for each requirement below. For any "No" responses, include the date the entity expects to be compliant with the requirement and provide a brief description of the actions being taken to meet the requirement.

PCI DSS Requirement	Description of Paguirement		nt to PCI irements : One)	Remediation Date and Actions (If "NO" selected for any
		YES	NO	Requirement)
1	Install and maintain network security controls			
2	Apply secure configurations to all system components			
3	Protect stored account data			
4	Protect cardholder data with strong cryptography during transmission over open, public networks			
5	Protect all systems and networks from malicious software			
6	Develop and maintain secure systems and software			
7	Restrict access to system components and cardholder data by business need to know			
8	Identify users and authenticate access to system components			
9	Restrict physical access to cardholder data			
10	Log and monitor all access to system components and cardholder data			
11	Test security systems and networks regularly			
12	Support information security with organizational policies and programs			
Appendix A1	Additional PCI DSS Requirements for Multi- Tenant Service Providers			
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections			











