

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:	Paya Inc.		DBA (doing business as):	Paya EFT			
Contact Name:	Alex Tan		Title:	Chief Security Officer		icer	
Telephone:	470.489.1155		E-mail:	alex.tan@	paya.co	m	
Business Address:	303 Perimeter Center N #600		City:	Atlanta			
State/Province:	GA Country:		USA		Zip:	30346	
URL:	https://www.paya.com						

Part 1b. Qualified Security Assessor Company Information (if applicable)						
Company Name:	AARC-360					
Lead QSA Contact Name:	James Spence, CIS QSA	A, CISSP,	Title:	Senior Manager		
Telephone:	+1 866 576 4414 Ext. 108		E-mail:	James.Spence@AARC-360.com		
Business Address:	8000 Avalon Boulev 100	ard, Suite	City:	Alpharetta		
State/Province:	GA Country:		USA		Zip:	30009
URL:	www.aarc-360.com					



Part 2a. Scope Verification						
Services that were INCLUDE	ED in the scope of the PCI DSS As	sessment (check all that apply)				
Name of service(s) assessed:	Paya – Payment Gateway					
Type of service(s) assessed:						
Hosting Provider:	Managed Services (specify):	Payment Processing:				
☐ Applications / software	☐ Systems security services	POS / card present				
☐ Hardware	☐ IT support					
☐ Infrastructure / Network	☐ Physical security	☐ MOTO / Call Center				
☐ Physical space (co-location)	☐ Terminal Management System	☐ ATM				
☐ Storage	☐ Other services (specify):					
☐ Web		Virtual Terminal Applications				
☐ Security services						
☐ 3-D Secure Hosting Provider						
☐ Shared 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	☐ Merchant Services	☐ Tax/Government Payments				
☐ Network Provider						
Others (specify):						
Note : These categories are provid	ed for assistance only, and are not inte	ended to limit or predetermine				



Part 2a Soons Varification /	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):				
Account Management	☐ Fraud and Char	geback	☐ Payment Gateway/Switch				
☐ Back-Office Services	☐ Issuer Processing		☐ Prepaid Services				
Billing Management	Loyalty Program	ıs	☐ Records Management				
☐ Clearing and Settlement	☐ Merchant Service	es	☐ Tax/Government Payments				
☐ Network Provider							
Others (specify):							
Provide a brief explanation why ar were not included in the assessment	•	Not Applicable					
Part 2b. Description of Paym	ent Card Business	,					
Describe how and in what capacity stores, processes, and/or transmit	-	transactions seculand Independent developed web apparties, or Class Apresent, card not independently developed web apparties, or Class Apresent, card not independently developed and is forwaprocessor; CHD in never has access reference code as a transaction data for transactions and of transactions required may include sensitransaction authorized.	Paya receives payment card rely over the Internet from merchants Sales Organizations (ISOs) via Paya oplications, API integration with third A terminals. ISOs may integrate card present, and MOTO into their veloped and assessed solution. Im Class A terminals is encrypted at carded directly to a third-party rever touches the Paya network. Paya to any CHD and only stores as a record of the transaction. In a receive all payment card rom Internet-based e-commerce collects and processes payment card fired for conducting business. Data ditive data required for payment card rization and data required for ssing with a third-party processor				



(TSYS, Chase Paymentech, First Data, or Bluefin). No sensitive authentication data is retained for any reason post authorization.

Storage – Paya stores PAN data within Microsoft SQL database instances using PCI DSS-compliant encryption. Data is retained for 18 months and is automatically deleted using a SQL stored procedure.

Transmission – Payment card transaction data is securely transported directly to Paya using TLS for processing.

Processing & Storage – Sensitive authentication data is required for transaction processing with third-party processors (Chase Paymentech, First Data, or TSYS). No sensitive authentication data is retained for any reason post authorization.

PAN data may be required for batch processing, customer inquiry, chargebacks and similar customer-based needs. Data is retained for 18 months and is automatically deleted using a SQL stored procedure.

Stored data may be used for transaction reference by a customer service representative or for audit by the risk management team if a red flag is issued. A red flag is when internal financial fraud analysis software identifies a transaction as being suspicious and requires additional review.

Access to payment card data is limited to specific authorized individuals and typically only one payment card at a time may be reviewed. In special circumstances (i.e., when a customer merchant leaves Paya, the merchant's encrypted data may be exported and provided to the customer – there are formally defined special procedures for that action.

Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data. Not Applicable

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
Paya Headquarters	1	Atlanta, GA
Co-location Datacenters	1	Suwanee, GA



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)
Paya Exchange Desktop (PED)	2.0.2.31	Paya, Inc.	⊠ Yes □ No	28 Oct 2022
Virtual Terminal Application	061818- 9167	Paya, Inc.	☐ Yes No	Not Applicable
Payment Center Virtual Terminal(PCVT)	062218- 1725	Paya, Inc.	☐ Yes No	Not Applicable
Paya Exchange Virtual Desktop(PEVD)	061918- 6791	Paya, Inc.	☐ Yes No	Not Applicable
Paya Exchange Virtual Terminal(PEVT)	062218- 9254	Paya, Inc.	☐ Yes No	Not Applicable
Paya Vault	062118- 9240	Paya, Inc.	☐ Yes No	Not Applicable
To Catch a Thief (TCAT)	032318- 8969	Paya, Inc.	☐ Yes No	Not Applicable
Sage API	070218- 9354	Paya, Inc.	☐ Yes No	Not Applicable
Shopping Cart	060418- 9060	Paya, Inc.	☐ Yes ⊠ No	Not Applicable
Donate Now	061818- 9167	Paya, Inc.	☐ Yes ⊠ No	Not Applicable

Part 2e. Description of Environment

Provide a <u>high-level</u> 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.

Paya is a level 1 service provider and payment gateway that focuses on small to medium size merchants, processing approximately 126 million transactions annually.

Paya provides business payment services:

- Multiple payment types including credit and debit cards, electronic checks, gift cards, and automatic recurring payments;
- Multiple acceptance platforms including card present and e-commerce/Internet payments (card not present).
- Card present transactions are handled using Class A terminals leased to the merchant. Data captured from Class A terminals is encrypted at swipe and is forwarded directly to a third-party processor.



		CHD never touches the Panever has access to any Conly a reference code as a	CHD and stores
		transaction.	a record of the
		Card Not Present transace Merchant services includin accounts, equipment, proof for retail, Mail Order/Telep (MOTO), and Internet bus valuable customer retentic cards, online reporting, and resources; and Customize solutions that integrate with and other third-party software.	ng merchant cessing solutions bhone Order inesses, and on tools like loyalty and financial ed payment th Paya Software
		Paya Token Vault assists being PCI compliant by pr resident encrypted storage vault employs a Globally I (GUID) also known as an which is stored on the men host software to represent data securely stored behing.	roviding a non- e solution. The Unique Identifier alias or token, rchant's server or t the encrypted
		Paya customers include retails Internet merchants, sales orga companies, government agence Service Providers, trade associnstitutions, gas and convenier restaurants, and entertainment hosting companies, newspape institutions.	nizations, utility cies, Internet ciations, financial nce stores, hotels, t outlets, web
Does your business use network segmentation environment?	to affect the s	cope of your PCI DSS	⊠ Yes □ No
(Refer to "Network Segmentation" section of PC segmentation)	I DSS for gui	dance on network	
Part 2f. Third-Party Service Providers			
Does your company have a relationship with a Country the purpose of the services being validated?	Qualified Integ	grator & Reseller (QIR) for	☐ Yes ⊠ No
If Yes:			
Name of QIR Company:	Not Applicab	le	
QIR Individual Name:	Not Applicab	le	
Description of services provided by QIR:	Not Applicab	le	
Does your company have a relationship with one example, Qualified Integrator Resellers (QIR), g service providers (PSP), web-hosting companie agents, etc.) for the purpose of the services being	ateways, pay s, airline bool	ment processors, payment	⊠ Yes □ No
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If Yes:				
Name of service provider:	Description of services provided:			
Quality Technology Services, LLC. (QTS)	Co-location data center hosting provider – Suwanee (GA)			
Magensa, LLC.	Encryption and Decryption of PAN Data			
TSYS Acquiring Solutions	Payment Processor			
First Data Merchant Service	Payment Processor			
Chase Paymentech	Payment Processor			
Bluefin	Payment Processor			
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 A	Paya – Payment Gateway					
		Details of Requirements Assessed				
PCI DSS Requirement	Full	Partial	None	Justification for Approach (Required for all "Partial" and "None" responses. Identify which sub-requirements were not tested and the reason.)		
Requirement 1:				Not Applicable 1.2.3 – Wireless networks are not used in the Payadefined CDE.		
Requirement 2:				Not Applicable 2.1.1 – No wireless network in the CDE. 2.2.3 – No unsecured ports and protocols running. 2.6 – Paya is not a shared hosting provider.		
Requirement 3:				Not Applicable 3.4.1 – No disk encryption in use. 3.6 – No key sharing with customers. 3.6.2 – Paya does not distribute keys. 3.6.6 – No manual clear-text cryptographic key management.		
Requirement 4:				Not Applicable 4.1.1 – Paya does not have any wireless network within the in-scope environment.		
Requirement 5:				Not Applicable 5.1.2 – Paya in-scope environment does not contain any systems that are considered to be not commonly affected by malicious software.		
Requirement 6:				Not Applicable 6.4.6 – There were no significant changes that occurred within the past 12 months.		



Requirement 7:	\boxtimes		
Requirement 8:			Not Applicable 8.5.1 – Paya is not provided access to customer networks.
Requirement 9:			Not Applicable 9.5 - 9.8.2 – Paya has no physical removable media in the environment. 9.9 - 9.9.3 – Paya has no payment capture devices inscope for this assessment.
Requirement 10:			
Requirement 11:			Not Applicable 11.2.3 – There were no significant changes to Paya's inscope environment.
Requirement 12:			
Appendix A1:			Not Applicable Paya is not a shared hosting provider.
Appendix A2:			Not Applicable Paya does not have POI/POS devices in scope.



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 30, 2023	
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



Section 3: Validation and Attestation Details

Part 3. PCI DSS Validation

This AOC is based on results noted in the ROC dated June 30, 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 Paya, Inc. BankCard 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 <i>Not Applicable</i> has not demonstrated full compliance with the PCI DSS.							
	Target Date for Compliance: A	lot 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							
	Not Applicable	Not Applicable						
Not Applicable Not Applicable								

Part 3a. Acknowledgement of Status

additional PCI DSS requirements that apply.

Signatory(s) confirms:

(Check all that apply)

The ROC was completed according to the <i>PCI DSS Requirements and Security Assessment Procedures</i> , Version <i>3.2.1</i> , 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



Part 3a. Acknowledgement of Status (continued)

- No evidence of full track data¹, CAV2, CVC2, CID, or CVV2 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 *Tenable*

Part 3b. Service Provider Attestation

Alex Tan

Signature of Service Provider Executive Officer ↑	Date: 07/07/2023	
Service Provider Executive Officer Name: Alex Tan	Title: Chief Security Officer	

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

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

AARC-360 verified scope of the environment, reviewed business processes and policy and procedure documents, examined network and data flow diagrams, and reviewed systems and applications inventory.

AARC-360 interviewed subject matter experts to discuss business processes, requested and reviewed evidence such as screenshots and system generated reports of sampled systems, discussed onboarding and off-boarding process with HR, and reviewed processes and procedures to validate PCI DSS v3.2.1 compliance activities.

Additionally, AARC-360 performed research on service providers and other critical technologies used within the Paya in-scope environment, conducted follow up meetings, and wrote the PCI DSS v3.2.1 Report on Compliance.

Jame Glen

Signature of Duly Authorized Officer of QSA Company ↑	Date: 07/07/2023	
Duly Authorized Officer Name: James Spence	QSA Company: AARC-360	

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

No ISAs were involved in this assessment.

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.

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









