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	
Telephone:	470.489.1155		E-mail:	alex.tan@paya.com	
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, CISA, CISSP, QSA		Title:	Senior Manager	
Telephone:	+1 866 576 4414 Ext. 108		E-mail:	James.Spence@AARC-360.com	
Business Address:	8000 Avalon Boulevard, Suite 100		City:	Alpharetta	
State/Province:	GA	Country:	USA	Zip:	30009
URL:	www.aarc-360.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:	Paya – 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): Virtual Terminal Applications
☐ 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 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: ☐ 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):		
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.	**Transmission –** Paya receives payment card transactions securely over the Internet from merchants and Independent Sales Organizations (ISOs) via Paya developed web applications, API integration with third parties, or Class A terminals. ISOs may integrate card present, card not present, and MOTO into their independently developed and assessed solution. Data captured from Class A terminals is encrypted at swipe and is forwarded directly to a third-party processor; CHD never touches the Paya network. Paya never has access to any CHD and only stores a reference code as a record of the transaction. **Processing –** Paya receives all payment card transaction data from Internet-based e-commerce transactions and collects and processes payment card transactions required for conducting business. Data may include sensitive data required for payment card transaction authorization and data required for transaction processing 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 ***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.*	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 Paya network. Paya never has access to any CHD and stores only a reference code as a record of the transaction. • **Card Not Present** transactions include Merchant services including merchant accounts, equipment, processing solutions for retail, Mail Order/Telephone Order (MOTO), and Internet businesses, and valuable customer retention tools like loyalty cards, online reporting, and financial resources; and Customized payment solutions that integrate with Paya Software and other third-party software. • **Paya Token Vault** assists merchants in being PCI compliant by providing a non-resident encrypted storage solution. The vault employs a Globally Unique Identifier (GUID) also known as an alias or token, which is stored on the merchant's server or host software to represent the encrypted data securely stored behind our firewall. Paya customers include retail stores, MOTO and Internet merchants, sales organizations, utility companies, government agencies, Internet Service Providers, trade associations, financial institutions, gas and convenience stores, hotels, restaurants, and entertainment outlets, web hosting companies, newspapers, and medical institutions.
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:**
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 Assessed:	Paya – Payment Gateway

PCI DSS Requirement	**Details of Requirements Assessed**			
	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 Paya-defined 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:	☒	☐	☐	
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 in-scope for this assessment.
Requirement 10:	☒	☐	☐	
Requirement 11:	☐	☒	☐	Not Applicable 11.2.3 – There were no significant changes to Paya's in-scope 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:	August 11, 2022	
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 August 11, 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):***

☒	**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 *Not Applicable* 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.

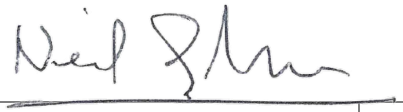
Part 3a. Acknowledgement of Status (continued)	
☒	No evidence of full track data[1], CAV2, CVC2, CID, or CVV2 data[2], or PIN data[3] storage after transaction authorization was found on ANY system reviewed during this assessment.
☒	ASV scans are being completed by the PCI SSC Approved Scanning Vendor *Tenable*

Part 3b. Service Provider Attestation

Signature of Service Provider Executive Officer ↗	*Date:*
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.



Signature of Duly Authorized Officer of QSA Company ↗	*Date:* August 12, 2022
Duly Authorized Officer Name: Neil Gonsalves	*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.

[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	☐	☐	
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	☐	☐