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:	Computing forces, JSC		DBA (doing business as):	Computing forces	
Contact Name:	Anton Faminskiy		Title:	Information security specialist	
Telephone:	+7 (495) 727-43-33		E-mail:	famisnkiy@molot.ru	
Business Address:	Irkutskaya str. 17/4		City:	Moscow	
State/Province:	Moscow	Country:	Russian Federation	Zip:	107497
URL:	http://www.molot.ru/				

Part 1b. Qualified Security Assessor Company Information (if applicable)					
Company Name:	Compliance Control, Ltd.				
Lead QSA Contact Name:	Rustam Guseynov		Title:	Lead Auditor	
Telephone:	+7-499-136-27-66		E-mail:	rustam@compliance-control.ru	
Business Address:	Revoluytcionnaya str., d.3		City:	Volokolamsk	
State/Province:	Moscow area	Country:	Russian Federation	Zip:	143600
URL:	http://compliance-control.ru				

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:	c2c, MoneySend, PayMaster Acquiring, Platron	
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):		

***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:	N/a	
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:	The entity doesn't have any services beyond the scope of the PCI DSS assessment.	

Part 2b. Description of Payment Card Business

Describe how and in what capacity your business stores, processes, and/or transmits cardholder data.	Entity has different e-commerce services. PayMaster Acquiring gets cardholder data from a website (iframe on merchants' sites or redirect to paymaster portal) for card-not-present transactions. After that, cardholder data are sent to acquiring banks for authorization. Entity keeps encrypted by RSA 2048 PAN in local MS SQL databases after authorization for business needs for 5 years. Entity processes approximately 3 million transactions annually. Platron works like PayMaster using MariaDB instead of MS SQL. Platron doesn't store CHD after successful authorization and encrypt them during storing. c2c and MoneySend work with cardholder data to send money between customers on the organization's website
Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data.	N/a

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*
Corporate office	2	Moscow, Russia
Data centre	3	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)
Paymaster Portal	1.2.1	Computing forces	☐ Yes ☒ No	N/a
Paymaster Core	1.2.0	Computing forces	☐ Yes ☒ No	N/a
Paymaster Backoffice	1.2.1	Computing forces	☐ Yes ☒ No	N/a
Paymaster Node	1.1.1	Computing forces	☐ Yes ☒ No	N/a

c2c.web.money	1.0.0.0	Computing forces	☐ Yes ☒ No	N/a
moneysend.web.money	1.0.0.0	Computing forces	☐ Yes ☒ No	N/a
c2capi.web.money	1.0.0.0	Computing forces	☐ Yes ☒ No	N/a
payprocessing	5.0	Computing forces	☐ Yes ☒ No	N/a

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 entity allocates CDE on physical and virtual servers in third party's data centres. There are several host's roles such as hypervisors, proxies, web servers, database servers, network devices (switches, firewalls), access control systems to the servers racks, code repositories, CI/CD tools. The entity uses automating software for building and testing its own applications and deploying them to the production environment. The entity has several security systems such as vulnerability scanner, WAF, IDS/IPS, FIM and monitoring system. All the connections inside or outside CDE are secured by VPN (IPSEC) or https (through TLS 1.2).
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:	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:**
Relsoft communications, Ltd.	Data centre provider

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:	c2c, MoneySend, PayMaster Acquiring, Platron

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:	☐	☒	☐	1.2.3 is n/a because wireless networks and devices are not used in the entity network; 1.4 is n/a because the entity doesn't allow remote access to infrustructure.
Requirement 2:	☐	☒	☐	2.1.1 is n/a because wireless networks and devices are not used in the entity network. 2.6 is n/a because the assessed entity is not a hosting-provider.
Requirement 3:	☐	☒	☐	3.4.c is n/a because removable media are not used. 3.4.1 is n/a because disk encryption isn't used.
Requirement 4:	☐	☒	☐	4.1.1 is n/a, because wireless networks and devices are not used in the entity network.
Requirement 5:	☒	☐	☐	
Requirement 6:	☒	☐	☐	
Requirement 7:	☒	☐	☐	
Requirement 8:	☐	☒	☐	8.1.5 is n/a because third parties don't have access to system components. 8.3.2 is n/a because entity doesn't allow remote access to infrustructure.

				8.5.1 is n/a because entity doesn't have access to customers' premises.
Requirement 9:	☐	☒	☐	9.6.2 is n/a because media are kept within data centre facilities. 9.9 (9.9.1-9.9.3) is n/a because entity doesn't have ATM and POS in scope of assessment.
Requirement 10:	☒	☐	☐	
Requirement 11:	☒	☐	☐	
Requirement 12:	☐	☒	☐	12.3 is n/a because entity doesn't use remote access or other critical technologies in scope of assessment.
Appendix A1:	☐	☐	☒	Entire section is n/a because the entity is not a shared hosting provider.
Appendix A2:	☐	☐	☒	Entire section is n/a because the entity doesn't use POI within the scope of the assessment.

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:	October 14, 2019	
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 October 14, 2019*.*

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 Computing forces, JSC 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: 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

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)

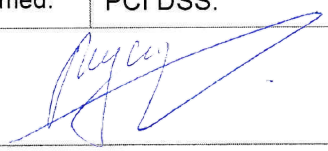
☒	No evidence of full track data[1], CAV2, CVC2, CID, or CVV2 data[2], or PIN data[3] storage after transaction authorization was found on ANY system reviewed during this assessment.
☒	ASV scans are being completed by the PCI SSC Approved Scanning Vendor Clone Systems, Inc.

Part 3b. Service Provider Attestation

Signature of Service Provider Executive Officer ↗	*Date:* October 14, 2019
Service Provider Executive Officer Name: Anton Faminskiy	*Title:* Information security specialist

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

If a QSA was involved or assisted with this assessment, describe the role performed:	Conducting verification procedures for compliance with PCI DSS.



Signature of Duly Authorized Officer of QSA Company ↗	*Date:* October 14, 2019
Duly Authorized Officer Name: Rustam Guseynov	*QSA Company:* Compliance Control, 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:	N/a

[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	☒	☐