

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: PAYNOPAIN SOLUTIONS, S.L.

Assessment End Date: 2024-06-09

Date of Report as noted in the Report on Compliance: 2024-06-09



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 Information	n
Part 1a. Assessed Entity (ROC Section 1.1)	
Company name:	PAYNOPAIN SOLUTIONS S.L.
DBA (doing business as):	PAYNOPAIN
Company mailing address:	Paseo de la universidad 23, Pta. 5 bajo, Castellón de la Plana
Company main website:	https://paynopain.com
Company contact name:	Jordi Nebot Carda
Company contact title:	CEO
Contact phone number:	+34 622 63 62 07
Contact e-mail address:	jordi@paynopain.com
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):	N/A		
Qualified Security Assessor			
Company name:	A2secure Tecnologias Informatica, Sociedad Ltd.		
Company mailing address:	Avda. Francesc Cambó 21, Planta 10, Barcelona		
Company website:	www.a2secure.com		
Lead Assessor name:	Jaime Loaiza		
Assessor phone number:	+34 933 945 601		
Assessor e-mail address:	jaime.loaiza@a2secure.com		

Assessor certificate number:	203-789	203-789		
Part 2. Executive Summary				
Part 2a. Scope Verification				
Services that were <u>INCLUDED</u> in	the scope of the Assessment (select al	I that apply):		
Name of service(s) assessed:	PAYNOPAIN) is an online gateway payment solutions, as well as cred businesses.	Currently the company has the following payment channels are as		
	Card - not present – eCommerce	e:		
	 provides the following integration API: In this scenario, PA merchants to process or integration Redirection (Iframe): W PAYNOPAIN's custome iframe within PAYNOPAI Javascript: PAYNOPAI to include a JavaScript for the statement of the statement	AYNOPAIN gives the ability to onlin hline transactions via a secure API with this integration type, or payment pages are displayed in a N's environment. N's JavaScript integration requires file into customer's web browser, to ardholder data and submits it to the horization. d on the hospitality industry, een different providers (PMS,		
Type of service(s) assessed:	with tokens.			
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 Back-Office Services	Fraud and Chargeback Issuer Processing	Payment Gateway/Switch Prepaid Services		

Billing Management	Loyalty Programs	Records Management			
Clearing and Settlement	learing and Settlement				
Network Provider					
Others (specify): Card Tokeniz	ation				
Others (specify): Card Tokeniz	ation				



Part 2a. Scope Verification (continued)

Services that are provided by the service provider but were <u>NOT INCLUDED</u> in the scope of the Assessment (select all that apply):

Name of service(s) not assessed:	N/A		
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	MOTO / Call Center	
Physical space (co-location)	Terminal Management System	□ ATM	
☐ Storage	Other services (specify):	Other processing (specify):	
Web-hosting services			
Security services			
3-D Secure Hosting Provider			
Multi-Tenant Service 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):			
Provide a brief explanation why any of were not included in the Assessment			

Part 2b. Description of Role with Payment Cards
(ROC Section 2.1)Describe how the business stores, processes, and/or
transmits account data.PAYNOPAIN is a Spanish company (Level 1
Payment Service Provider) that provides a payment
gateway to multiple clients in different countries. The
company offers services to merchants, allowing
automated solutions in payment methods as
described in Part 2a. Scope Verification.During card-not-present transactions, the company
processes payment data from customers on e-

	commerce websites and forwards it to other payment gateways, acquirers, or issuers for payment authorization.
	As a payment gateway, PAYNOPAIN uses strong cryptography to securely store and tokenize cardholder data internally, supporting recurring o repeat transactions for one or multiple acquirers. The company ensures that cardholder data is stored only for as long as necessary and retention periods are constantly monitored.
	 PAYNOPAIN exclusively transmits cardholder data to secure acquirers for mandatory operations. Finally, the payment platform consists of different services developed and maintained by the company.
Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.	PAYNOPAIN is classified as a payment gateway that provides multiple payment solutions, as well a cardholder data processing, to their online busines customers.
	As a result of the above activities, PAYNOPAII collects and processes the cardholder data (CHD) to internally tokenize the details, supporting recurring transactions or repeat transactions for multiple acquirers.
	It is important to mention that sensitive authentication data (SAD) elements (CVC2, CVV, CVV2) are never retained after authorization.
Describe system components that could impact the security of account data.	PAYNOPAIN's PCI environment consists of web an application servers, databases, applications, an security systems that provide security services (e.g SIEM, FIM, etc.). These components are located within a Cloud Platform (AWS).



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.

PAYNOPAIN'S PCI environment consists of web and application servers, databases, applications, and security systems that provide security services (e.g., SIEM, FIM, etc.). These components are located within a Cloud Platform (AWS).

On the Cloud Platform, the company utilizes Virtual Private Cloud (VPC) to create different networks, subnets, ACLs, and network security groups. This infrastructure enables the implementation of segmentation techniques to isolate the cardholder data environment (CDE) from non-business-related systems and functions.

Both incoming and outgoing connections within PAYNOPAIN's environment are always set up as HTTPS, secured with TLS 1.2. The Primary Account Number (PAN) is encrypted using strong cryptography (AES-256) with the associated key-management AWS service (KMS).

All services listed in the scope of this assessment, including Internet/eCommerce and Payment Gateway/Switch, were evaluated for the storage, processing, or transmission of cardholder data (CHD) and sensitive authentication data (SAD).

The locations and flow of data were identified through:

- Reviewing the services' architecture and implementation
- Conducting interviews with service owners, developers, and administrators
- Examining policies, procedures, and services documentation
- Validating data locations and cardholder data flows with the key stakeholders at PAYNOPAIN.

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	Castellón de la Plana, Spain



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 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	N/A

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 (PA-DSS), 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 entity have relationships with one or more third-party service providers that:

Store, process, or transmit account data or gateways, payment processors, payment	🛛 Yes 🗌 No			
 Manage system components included in a network security control services, anti-ma management (SIEM), contact and call cen SaaS, and FaaS cloud providers) 	🖾 Yes 🔲 No			
Could impact the security of the entity's C remote access, and/or bespoke software	🛛 Yes 🗌 No			
If Yes:				
Name of Service Provider:				
Redsys Servicios de Procesamiento S.L Payment Gateway Switch - Transaction procesa		ing		
Amazon Web Services (AWS)				

Note: Requirement 12.8 applies to all entities in this list.



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:

• Refer to Part 2a. Scope Verification.

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:						
Requirement 2:						
Requirement 3:						
Requirement 4:	\boxtimes					
Requirement 5:	\boxtimes					
Requirement 6:	\boxtimes					
Requirement 7:	\boxtimes					
Requirement 8:	\boxtimes					
Requirement 9:	\boxtimes					
Requirement 10:	\boxtimes					
Requirement 11:	\boxtimes					
Requirement 12:						
Appendix A1:						
Appendix A2:						
Justification for Approach					·	



	• 1.2.6, 2.2.5 No insecure services,
	protocols or ports were identified in PAYNOPAIN.
	• 1.3.3, 2.3.1, 2.3.2, 4.2.1.2 No wireless
	networks exist in PCI DSS environment
	3.3.1.1 PAYNOPAIN does not store the
	full contents of any track (from the
	magnetic stripe located on the back of a
	card, equivalent data contained on a chip, or elsewhere) after authorization.
	 3.3.1.3. PAYNOPAIN does not store the
	personal identification number (PIN) or
	the encrypted PIN block after
	authorization.
	3.3.3 Paynopain does not support issuing
	services
	 3.5.1.3. Disk encryption is not used.
	 3.5.1.a. Hashed versions of the same
	PAN are present in the environment.
	• 3.4.2, 3.5.1.1, 3.5.1.2, 3.6.1.1, 4.2.1.1,
	5.2.3.1, 5.3.2.1, 5.3.3, 5.4.1, 6.3.2, 6.4.2,
	6.4.3, 7.2.4, 7.2.5, 7.2.5.1, 8.3.6, 8.3.10,
	8.3.10.1, 8.4.2, 8.5.1, 8.6.1, 8.6.2, 8.6.3, 10.4.1.1, 10.4.2, 10.7.1.b, 10.7.2, 10.7.3
	,11.3.1.1, 11.3.1, 11.3.1.2, 11.4.7,
	11.5.1.1, 11.6.1, 12.3.1, 12.3.3, 12.3.4,
	12.5.2.1.a, 12.5.3, 12.6.2, 12.6.3.1,
For any Not Applicable responses, identify which sub-	12.6.3.2, 12.7.1, 12.10.4.1.b, 12.10.7
requirements were not applicable and the reason.	Best practice until 2025.
requirements were not applicable and the reason.	 3.7.6 There are no manual clear-text
	cryptographic key- management
	operations in use.
	3.7.9. PAYNOPAIN don't share keys with
	 their customers. 4.2.2 PAYNOPAIN SOLUTIONS S.L.
	 4.2.2 PAYNOPAIN SOLUTIONS S.L. does not send unprotected PANs by end-
	user messaging technologies
	• 5.2.1.a, 5.2.2, 5.2.3, 5.3.1, 5.3.2, 5.3.4,
	5.3.5 Not Applicable. PAYNOPAIN does
	not have systems commonly affected by
	malicious software
	• 7.2.3.b During the past year, there have
	been no new additions.
	8.2.3 PAYNOPAIN SOLUTIONS S. L
	does not have third parties with access to PCI environment.
	8.2.5.b There are no physical
	authentication methods present on
	PAYNOPAIN'S CDE
	8.2.7 There are not customers who
	access to PAYNOPAIN SOLUTIONS S.L
	CDE.
	• 9.4.1.1, 9.4.1.2, 9.4.2, 9.4.3, 9.4.4, 9.4.5,
	9.4.6, 9.4.7. PAYNOPAIN SOLUTIONS S.L does not use physically secure all
	media and removable media, neither hav

	 9.5.1, 9.5.1.1, 9.5.1.2, 9.5.1.2.1, 9.5.1.3 PAYNOPAIN SOLUTIONS S.L does no have any device that capture payment card data via direct physical interaction PAYNOPAIN is not a shared hosting provider PAYNOPAIN does not use SSL or early TLS
For any Not Tested responses, identify which sub- requirements were not tested and the reason.	-



Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3.2)

Date Assessment began: Note: This is the first date that evidence was g	2024-04-03		
Date Assessment ended: <i>Note:</i> This is the last date that evidence was g	2024-06-09		
Were any requirements in the ROC unable to be met due to a legal constraint?			🗌 Yes 🖾 No
Were any testing activities performed remotely? If yes, for each testing activity below, indicate whether remote assessment activities were performed:			🛛 Yes 🔲 No
Examine documentation	🛛 Yes	🗌 No	
Interview personnel	🛛 Yes	🗌 No	
Examine/observe live data	🛛 Yes	🗌 No	
Observe process being performed	⊠Yes	🗌 No	
Observe physical environment	🛛 Yes	🗌 No	-
Interactive testing	🛛 Yes	🗌 No	
• Other:	🗌 Yes	🗌 No	



Section 3 Validation and Attestation Details

Part 3. PCI DSS Validation (ROC Section 1.7)
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This AOC is based on results noted in the ROC dated (*Date of Report as noted in the ROC* : 2024-06-09). Indicate below whether a full or partial PCI DSS assessment was completed:

- ☑ Full Assessment All requirements have been assessed and therefore no requirements were marked as Not Tested in the ROC.
- □ Partial Assessment One or more requirements have not been assessed and were therefore marked as Not Tested in the ROC. Any requirement not assessed is noted as Not Tested in Part 2g above.

Based on the results documented in the ROC noted above, each signatory identified in any of Parts 3b-3d, as applicable, assert(s) the following compliance status for the entity identified in Part 2 of this document *(select one):*

\square	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		
	PAYNOPAIN SOLUTIONS, S.L 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 PAYNOPAIN SOLUTIONS , S.L has not demonstrated compliance with PCI DSS requirements.		
	Target Date for Compliance:		
	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 <i>PAYNOPAIN SOLUTIONS, S.L</i> 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 review 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)

\boxtimes	The ROC was completed according to <i>PCI DSS</i> , Version 4.0 and was completed according to the instructions therein.
	All information within the above-referenced ROC and in this attestation fairly represents the results of the Assessment in all material respects.
\boxtimes	PCI DSS controls will be maintained at all times, as applicable to the entity's environment.

Part 3b. Service Provider Attestation		
DocuSigned by:		
Jordi Nebot Carda		
Signature of Service Provider Executive Officer ↑	Date: 2024-06-09	
Service Provider Executive Officer Name: Jordi Nebot Carda	Title: CEO	

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 oth If selected, describe	ner assistance. all role(s) performed:		
A2SECURE tu compania de segundad cr# : B-68040107	Avda, Francoto Camibó 21, 10* 06003 Barcalona T : 93 304 56 00 F : 90 304 56 01			
Signature of Lead QSA ↑		Date: 2024-06-09		
Lead QSA Name: Jaime Loaiza				
Arda. Francose Cambó 21, 10° 08003 Barcolone T : 93 304 56 00 CtF : B-66040107 F : 90 304 56 01				
Signature of Duly Authorized Officer of QSA C	Company 1	Date: 2024-06-16		
Duly Authorized Officer Name: Albert Morell		QSA Company: A2SECURE Tecnologias Informática, Sociedad Ltd.		



Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement		
If an ISA(s) was involved or assisted with this Assessment, indicate the role performed:	☐ ISA(s) performed testing procedures.	
	☐ ISA(s) provided other assistance.	
	If selected, describe all role(s) performed:	



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 Requirement		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			PAYNOPAIN is not a shared hosting provider
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card- Present POS POI Terminal Connections			PAYNOPAIN does not use SSL or early TLS



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