



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:	AFONE PAIEMENT	DBA (doing business as):			
Contact Name:	Arnaud Duros	Title:	Chief Security Officer		
Telephone:	+33 2 72 73 58 49	E-mail:	aduros@afoneinfrastructure.com		
Business Address:	11 place François Mitterand	City:	Angers		
State/Province:	-	Country:	France	Zip:	49100
URL:	https://www.afonepaiement.com				

Part 1b. Qualified Security Assessor Company Information (if applicable)

Company Name:	Sysdream				
Lead QSA Contact Name:	Vincent Hautot	Title:	CTO		
Telephone:	+ 33 178 765 820	E-mail:	v.hautot@sysdream.com		
Business Address:	14 place Marie-Jeanne Bassot	City:	Levallois-Perret		
State/Province:	-	Country:	France	Zip:	92300
URL:	https://www.sysdream.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: Afone ComNPAY PSP and Afone Proxy

Type of service(s) assessed:

Hosting Provider:	Managed Services (specify):	Payment Processing:
<input type="checkbox"/> Applications / software	<input type="checkbox"/> Systems security services	<input type="checkbox"/> POS / card present
<input type="checkbox"/> Hardware	<input type="checkbox"/> IT support	<input type="checkbox"/> Internet / e-commerce
<input type="checkbox"/> Infrastructure / Network	<input type="checkbox"/> Physical security	<input type="checkbox"/> MOTO / Call Center
<input type="checkbox"/> Physical space (co-location)	<input type="checkbox"/> Terminal Management System	<input type="checkbox"/> ATM
<input type="checkbox"/> Storage	<input type="checkbox"/> Other services (specify):	<input type="checkbox"/> Other processing (specify):
<input type="checkbox"/> Web		
<input type="checkbox"/> Security services		
<input type="checkbox"/> 3-D Secure Hosting Provider		
<input type="checkbox"/> Shared Hosting Provider		
<input type="checkbox"/> Other Hosting (specify):		
<input type="checkbox"/> Account Management	<input checked="" type="checkbox"/> Fraud and Chargeback	<input checked="" type="checkbox"/> Payment Gateway/Switch
<input type="checkbox"/> Back-Office Services	<input type="checkbox"/> Issuer Processing	<input type="checkbox"/> Prepaid Services
<input type="checkbox"/> Billing Management	<input type="checkbox"/> Loyalty Programs	<input type="checkbox"/> Records Management
<input type="checkbox"/> Clearing and Settlement	<input checked="" type="checkbox"/> Merchant Services	<input type="checkbox"/> Tax/Government Payments
<input type="checkbox"/> Network Provider		
<input type="checkbox"/> 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:	Afone MVNO, Wifilib, Wekiki, Dilib, Teleplanete, Ivitrines, Call Center	
Type of service(s) not assessed:		
Hosting Provider: <input type="checkbox"/> Applications / software <input type="checkbox"/> Hardware <input type="checkbox"/> Infrastructure / Network <input type="checkbox"/> Physical space (co-location) <input type="checkbox"/> Storage <input type="checkbox"/> Web <input type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input type="checkbox"/> Shared Hosting Provider <input type="checkbox"/> Other Hosting (specify):	Managed Services (specify): <input type="checkbox"/> Systems security services <input type="checkbox"/> IT support <input type="checkbox"/> Physical security <input type="checkbox"/> Terminal Management System <input type="checkbox"/> Other services (specify):	Payment Processing: <input checked="" type="checkbox"/> POS / card present <input checked="" type="checkbox"/> Internet / e-commerce <input checked="" type="checkbox"/> MOTO / Call Center <input type="checkbox"/> ATM <input type="checkbox"/> Other processing (specify):
<input type="checkbox"/> Account Management	<input type="checkbox"/> Fraud and Chargeback	<input type="checkbox"/> Payment Gateway/Switch
<input type="checkbox"/> Back-Office Services	<input type="checkbox"/> Issuer Processing	<input type="checkbox"/> Prepaid Services
<input type="checkbox"/> Billing Management	<input type="checkbox"/> Loyalty Programs	<input type="checkbox"/> Records Management
<input type="checkbox"/> Clearing and Settlement	<input type="checkbox"/> Merchant Services	<input type="checkbox"/> Tax/Government Payments
<input type="checkbox"/> Network Provider		
<input type="checkbox"/> Others (specify):		
Provide a brief explanation why any checked services were not included in the assessment:	Afone also has merchant activities with direct sales to end users. All these activities were not included in the scope of this assessment.	

Part 2b. Description of Payment Card Business	
Describe how and in what capacity your business stores, processes, and/or transmits cardholder data.	AFONE PAIEMENT is a service provider that provides two payment processing services to merchants (e-commerce platforms and POS).
Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data.	AFONE PAIEMENT receives payments from customers' web applications and points of sale. Therefore, cardholder data could be exposed while it is transmitted to the Afone information system or while it is stored there during the processing.

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):
<i>Example: Retail outlets</i>	3	Boston, MA, USA
Headquarters	1	Angers, France
Data centers	1	Saint-Denis, France

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)
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	

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 assessment covers three payment channels provided by AFONE PAIEMENT to its customers:

Card not-present: PSP ComNPay

This platform receives payments from customer web applications, AFONE's web applications and AFONE's telephony systems. On the client side, no cardholder data is stored, as the payment is entirely processed on the ComNPay PSP platform by Afone ComNPay application.

	<p>Card present: Afone Proxy</p> <p>In this offer, Afone provides stand-alone PTS to its customers. They perform independently from any system in the CDE, cardholder data is just transferred over the network to the bridges with the acquirer, Monext.</p>
<p>Does your business use network segmentation to affect the scope of your PCI DSS environment? <i>(Refer to "Network Segmentation" section of PCI DSS for guidance on network segmentation)</i></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

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? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes:	
Name of QIR Company:	
QIR Individual Name:	
Description of services provided by QIR:	
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? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If Yes:	
Name of service provider:	Description of services provided:
Equinix	Data center hosting.
Payvision	Payment processing.
CM-CIC	Payment processing.
Payline (Monext)	Payment processing (3D secure).
SIA	Payment processing.
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: <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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:	Afone ComNPAY PSP and Afone Proxy
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:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1.2.3: no wireless environment is connected to the CDE.
Requirement 2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2.1.1: no wireless environment is connected to the CDE. 2.6: Afone is not a shared hosting provider.
Requirement 3:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3.2.3: Afone does not receive the PIN. 3.4.1: Disk encryption is not used.
Requirement 4:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4.1.1: no wireless environment is connected to the CDE. 4.2: no end-user messaging is present in the CDE.
Requirement 5:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5.1/5.2/5.3: Afone does not use an operating system commonly affected by malicious software.
Requirement 6:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	6.4.6: a significant change has not occurred within the past 12 months.
Requirement 7:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 8:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8.1.5: no third-party is allowed to access to the CDE. 8.5.1: Afone does not have any access to customers premises.
Requirement 9:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	9.1 – 9.4: Afone uses a PCI DSS certified datacenter (Equinix) 9.5.1: there is no media backups. 9.6.2: no media is sent outside the CDE. 9.8.1: Afone does not handle hard-copy materials with CHD. 9.9/9.9.1/9.9.2/9.9.3: there is no device capturing CHD in the scope.
Requirement 10:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 11:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	11.1.1: no wireless environment is connected to the CDE.
Requirement 12:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Appendix A1:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Afone is not a shared hosting provider.
Appendix A2:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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:	November 16th, 2020	
Have compensating controls been used to meet any requirement in the ROC?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Were any requirements in the ROC identified as being not applicable (N/A)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Were any requirements not tested?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Were any requirements in the ROC unable to be met due to a legal constraint?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

Section 3: Validation and Attestation Details

Part 3. PCI DSS Validation

This AOC is based on results noted in the ROC dated November 16th, 2020.

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**):

<input type="checkbox"/>	Compliant: All sections of the PCI DSS ROC are complete, all questions answered affirmatively, resulting in an overall COMPLIANT rating; thereby (<i>Service Provider Company Name</i>) has demonstrated full compliance with the PCI DSS.						
<input type="checkbox"/>	<p>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>Service Provider Company Name</i>) has not demonstrated full compliance with the PCI DSS.</p> <p>Target Date for Compliance:</p> <p>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. <i>Check with the payment brand(s) before completing Part 4.</i></p>						
<input checked="" type="checkbox"/>	<p>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.</p> <p><i>If checked, complete the following:</i></p> <table border="1"> <thead> <tr> <th>Affected Requirement</th> <th>Details of how legal constraint prevents requirement being met</th> </tr> </thead> <tbody> <tr> <td>9.1.1</td> <td>French legal retention of camera records is limited to one month (Loi 78-17 du 6 janvier 1978 modifiée).</td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Affected Requirement	Details of how legal constraint prevents requirement being met	9.1.1	French legal retention of camera records is limited to one month (Loi 78-17 du 6 janvier 1978 modifiée).		
Affected Requirement	Details of how legal constraint prevents requirement being met						
9.1.1	French legal retention of camera records is limited to one month (Loi 78-17 du 6 janvier 1978 modifiée).						

Part 3a. Acknowledgement of Status

Signatory(s) confirms:

(Check all that apply)

<input checked="" type="checkbox"/>	The ROC was completed according to the <i>PCI DSS Requirements and Security Assessment Procedures</i> , Version 3.2.1, and was completed according to the instructions therein.
<input checked="" type="checkbox"/>	All information within the above-referenced ROC and in this attestation fairly represents the results of my assessment in all material respects.
<input checked="" type="checkbox"/>	I have confirmed with my payment application vendor that my payment system does not store sensitive authentication data after authorization.
<input checked="" type="checkbox"/>	I have read the PCI DSS and I recognize that I must maintain PCI DSS compliance, as applicable to my environment, at all times.
<input checked="" type="checkbox"/>	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 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 Outpost

Part 3b. Service Provider Attestation



Signature of Service Provider Executive Officer ↑	Date: January, 2021
Service Provider Executive Officer Name: Éric Durand-Gasselin	Title: Executive Director

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

If a QSA was involved or assisted with this assessment, describe the role performed:	<i>QSA performed on-site interviews, evidence collections, documentation and configuration reviews and completed the RoC as required per the PCI-DSS requirements.</i>
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Signature of Duly Authorized Officer of QSA Company ↑	Date: January, 2021
Duly Authorized Officer Name: Vincent Hautot	QSA Company: Sysdream

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2	Do not use vendor-supplied defaults for system passwords and other security parameters	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3	Protect stored cardholder data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4	Encrypt transmission of cardholder data across open, public networks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5	Protect all systems against malware and regularly update anti-virus software or programs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6	Develop and maintain secure systems and applications	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7	Restrict access to cardholder data by business need to know	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8	Identify and authenticate access to system components	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9	Restrict physical access to cardholder data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10	Track and monitor all access to network resources and cardholder data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11	Regularly test security systems and processes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12	Maintain a policy that addresses information security for all personnel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Appendix A1	Additional PCI DSS Requirements for Shared Hosting Providers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections	<input checked="" type="checkbox"/>	<input type="checkbox"/>	



