

Ixopay, Inc.

Payment Card Industry (PCI)

Data Security Standard

2024 Attestation of Compliance







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: Ixopay, Inc.

Assessment End Date: 20 July 2024

Date of Report as noted in the Report on Compliance: 20 July 2024



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

Part 1a. Assessed Entity (ROC Section 1.1)

Company name:	Ixopay, Inc.
DBA (doing business as):	Not Applicable.
Company mailing address:	5314 South Yale Avenue, Suite 800, Tulsa, Oklahoma 74135, USA
Company main website:	www.lxopay.com
Company contact name:	Marc Phillips
Company contact title:	GRC Director
Contact phone number:	+1 (877) 316-4544
Contact e-mail address:	m.phillips@ixopay.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):	Not Applicable.		
Qualified Security Assessor			
Company name:	A-LIGN Compliance and Security, Inc. dba A-LIGN		
Company mailing address:	400 N. Ashley Drive Suite 1325, Tampa, Florida 33602, USA		
Company website:	https://www.A-LIGN.com		
Lead Assessor name:	Daniel Powers		
Assessor phone number:	+1 (888) 702-5446		
Assessor e-mail address:	Daniel.powers@A-LIGN.com		



Assessor certificate number: 203-707 **Part 2. Executive Summary** Part 2a. Scope Verification Services that were INCLUDED in the scope of the Assessment (select all that apply): Name of service(s) assessed: Tokenization Service including Browser and Mobile Implementations, Token Services API, Batch File Transfer Capability, P2PE Devices, Ecommerce Package, Mobile API, and Transparent Gateway. Type of service(s) assessed: **Hosting Provider: Managed Services: Payment Processing:** Applications / software ☐ Systems security services POI / card present ☐ Hardware ☐ Infrastructure / Network ☐ Physical security ☐ Physical space (co-location) ☐ Terminal Management System \square ATM ☐ Other services (specify): ☐ Other processing (specify): ☐ Storage ☐ Web-hosting services ⊠ Security services ☐ 3-D Secure Hosting Provider ☐ Multi-Tenant Service Provider ☑ Other Hosting (specify): Tokenization Service Provider ☐ Account Management ☐ Fraud and Chargeback ☐ Payment Gateway/Switch ☐ Back-Office Services ☐ Issuer Processing ☐ Prepaid Services ☐ Billing Management ☐ Loyalty Programs ☐ Records Management ☐ Clearing and Settlement ☐ 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 these categories do not apply to the assessed service, complete "Others." If it is not clear whether a category could apply to the assessed service, consult with the entity(ies) to which this AOC will be submitted.



Part 2. Executive Summary (continued) Part 2a. Scope Verification (continued) Services that are provided by the service provider but were NOT INCLUDED in the scope of the Assessment (select all that apply): Name of service(s) not assessed: Not Applicable. Type of service(s) not assessed: **Payment Processing: Hosting Provider: Managed Services:** ☐ Applications / software ☐ Systems security services □ POI / card present ☐ Hardware ☐ Internet / e-commerce ☐ MOTO / Call Center ☐ Infrastructure / Network ☐ Physical security ☐ Physical space (co-location) ☐ Terminal Management System $\prod ATM$ ☐ Storage Other services (specify): Other processing (specify): ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Multi-Tenant Service Provider ☐ Other Hosting (specify): ☐ Fraud and Chargeback ☐ Payment Gateway/Switch ☐ Account Management ☐ Back-Office Services ☐ Prepaid Services ☐ Issuer Processing ☐ 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 Not Applicable. All services provided by Ixopay are were not included in the Assessment: included in this assessment. Part 2b. Description of Role with Payment Cards (ROC Section 2.1) Describe how the business stores, processes, and/or Ixopay is a tokenization service provider for transmits account data. transactions transmitted via SSH-initiated API calls from P2PE devices and files transmitted via SFTP to provide scope reduction to its clients. Ixopay also provides a JavaScript iFrame allowing users to enter cardholder data which is directed to Ixopay for tokenization and authorization on behalf of the merchant.



Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.	Ixopay, a TokenEx company, specializes in the areas of ecommerce, compliance data security, and course payments. Ixopay develops solutions specifically designed for organization's processing payments including tokenization services. Tokenization of payment card data is achieved using API calls, P2PE devices, and File uploads using SFTP.
Describe system components that could impact the security of account data.	There are no additional systems that could impact the security of account data.



Part 2. Executive Summary (continued)

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.

The assessment for Ixopay service provider offerings included all cardholder data environments. All devices located within the Ixopay CDE in the Microsoft Azure Data Center were assessed. It was confirmed that no CHD was stored, processed, or transmitted outside of these environments through documentation, interviews, and process review. Additionally, diagrams and database information were shared for validation testing and compliance validation.

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	
Microsoft Azure Data Centers	Varies	Undisclosed	



Part 2. Executive Summary (continued)

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
Not Applicable.	Not Applicable.	Not Applicable.	Not Applicable.	Not Applicable.

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 (PADSS), 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 enthat:	tity have relationships with one or more third-party	service providers		
· · ·	on the entity's behalf (for example, payment service providers (PSPs, and off-site storage))	⊠ Yes □ No		
 Manage system components included in the entity's Assessment (for example, via network security control services, anti-malware services, security incident and event management (SIEM), contact and call centers, web-hosting companies, and laaS, PaaS, SaaS, and FaaS cloud providers) 				
• Could impact the security of the entity's CDE (for example, vendors providing support via remote access, and/or bespoke software developers). ☐ Yes ☒ No				
If Yes:				
Name of Service Provider: Description of Services Provided:				
Microsoft Azure	Cloud Services Provider			
Note: Requirement 12.8 applies to all entities in this list.				



Part 2. Executive Summary (continued)

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: Tokenization Service including Browser and Mobile Implementations, Token Services API, Batch File Transfer Capability, P2PE Devices, Ecommerce Package, Mobile API, and Transparent Gateway

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	
roquiromoni	In Place	Not Applicable	Not Tested	Not in Place	Customized Approach	Compensating Controls
Requirement 1:	\boxtimes	\boxtimes				
Requirement 2:	\boxtimes	\boxtimes				
Requirement 3:	\boxtimes	\boxtimes				
Requirement 4:	\boxtimes	\boxtimes				
Requirement 5:		\boxtimes				
Requirement 6:		\boxtimes				
Requirement 7:						
Requirement 8:		\boxtimes				
Requirement 9:	\boxtimes	\boxtimes				
Requirement 10:	\boxtimes	\boxtimes				
Requirement 11:	\boxtimes	\boxtimes				
Requirement 12:						
Appendix A1:		\boxtimes				
Appendix A2:		\boxtimes				
Justification for Approach						



For any Not Applicable responses, identify which subrequirements were not applicable and the reason. Requirement 1.2.6 - Not Applicable. Based on the references in Requirement 1.2.5, the assessor verified that no insecure services, protocols, and ports were in use.

Requirement 1.3.3; 2.3.1; 2.3.2; 4.2.1.2 - Not Applicable. Ixopay's CDE is hosted within a controlled cloud environment where wireless networks are explicitly prohibited.

Requirement 1.4.5 - Not Applicable. The assessor examined NSC configurations and interviewed Ixopay personnel who explained the disclosure of private IP addresses is not permitted.

Requirement 2.2.5 - Not Applicable. Based on the references listed in Requirement 2.2.4, the assessor verified that no insecure services, protocols, or daemons were present.

Requirement 3.3.2 - Not Applicable. Based on the data flow diagram and narrative and a review of the database schema and content, the assessor verified that SAD is stored only within memory prior to authorization and is overwritten/flushed after the authorization process is finished.

Requirement 3.3.3 - Not Applicable. The entity is not an issuer and does not support issuing services.

Requirement 3.4.2 - Not Applicable. The assessor observed PAN is tokenized and encrypted, Ixopay Staff do not have access to decrypted PAN and have no ability to copy or relocate PAN.

Requirement 3.5.1.1 - Not Applicable. The assessor reviewed the network diagram, the cardholder data flow and related business processes, interviewed relevant personnel and verified that there were no hashes of PAN present within the environment.

Requirement 3.5.1.2; 3.5.1.3 - Not Applicable. The assessor reviewed the network diagram, the cardholder data flow and related business processes, interviewed relevant personnel and verified that disk-level or partition-level encryption was not utilized within the environment.

Requirement 3.6.1.3; 3.7.6 - Not Applicable. The assessor reviewed the network diagram, the cardholder data flow, encryption processes and interviewed relevant personnel and verified that no cleartext cryptographic key components were utilized within the environment.

Requirement 3.7.2 - Not Applicable. The assessor reviewed Ixopay's documented key management procedures and observed processes for managing encryption keys to verify that cryptographic keys are not distributed.

Requirement 3.7.9 - Not Applicable. The assessor reviewed the network diagram, the cardholder data flow and related business processes, interviewed relevant personnel and verified that no cryptographic keys are shared with customers.

Requirement 4.2.2 - Not Applicable. The assessor reviewed the cardholder data flow, related business processes, and interviewed relevant personnel to



verify that PAN is never transmitted via end-user messaging technologies.

Requirement 5.2.3; 5.2.3.1 - Not Applicable. Based on the references listed in Requirement 5.2.1, the assessor verified that all in-scope system components were considered to be at risk for malware.

Requirement 5.3.2.1 - Not Applicable. Based on the references listed in Requirement 5.3.2, the assessor verified that continuous behavioural analysis of systems and processes was performed by the antimalware software to satisfy this requirement.

Requirement 6.4.3; 11.6.1 - Not Applicable. The assessor reviewed the network diagram, the cardholder data flow and related business processes, interviewed relevant personnel, and verified that Ixopay does not manage or provide any payment pages. Ixopay's JavaScript package is implemented by Ixopay's customers into their own payment page.

Requirement 6.5.2; 11.3.1.3; 11.3.2.1 - Not Applicable. The assessor verified there were no significant changes by interviewing Ixopay stakeholders regarding the status of the entity's inscope systems and networks for the past 12 months. In addition, the assessor reviewed change management records, network diagrams, cardholder data flow diagrams, and business workflows to confirm there were no significant changes during the time period being assessed.

Requirement 8.2.2 - Not Applicable. The assessor interviewed Ixopay's stakeholders and examined users with access to the production environment in Azure to confirm group, shared, generic accounts and shared authentication credentials are not utilized.

Requirement 8.2.3 - Not Applicable. The assessor reviewed the network diagram, the cardholder business workflow and related business processes, interviewed relevant personnel, and verified that Ixopay does not maintain access to their customer's premises.

Requirement 8.2.7 - Not Applicable. Based on a review of the user listing of in-scope system components, the network diagram, interviews with relevant personnel, the assessor verified that the entity does not allow third-party access into the CDE or in-scope environment.

Requirement 8.3.9; 8.3.10; 8.3.10.1 - Not Applicable. Based on the references listed in Requirement 8.4, the assessor verified that all authentication into inscope systems required MFA.

Requirement 8.6.1; 8.6.2; 8.6.3 - Not Applicable. The assessor reviewed the authentication flow and configuration, user listing, access management policies and interviewed relevant personnel and verified that interactive login is not possible or permitted within the in-scope environment.

Requirement 9.4.1; 9.4.1.1; 9.4.1.2; 9.4.2; 9.4.3; 9.4.4; 9.4.5; 9.4.5; 9.4.6; 9.4.7 - Not Applicable.



The assessor reviewed the data flow diagram, data retention and management processes, business processes involving cardholder data, interviewed relevant personnel, and verified that no media was utilized for transmitting, storing, or processing cardholder data.

Requirement 9.5.1; 9.5.1.1; 9.5.1.2; 9.5.1.2.1; 9.5.1.3 - Not Applicable. The assessor reviewed the data flow diagram, business processes, interviewed relevant personnel to confirm Ixopay does not utilize POI devices in part of the services assessed.

Requirement 10.4.2.1 - Not Applicable. The assessor reviewed the audit logging processes, the internal logging system, the security logging policies and procedures and interviewed relevant personnel to confirm that all audit logs are analyzed by an automated mechanism.

Requirement 11.4.4 - Not Applicable. Based on the references listed below, the assessor verified there were no exploitable vulnerabilities or security weaknesses found during the internal and external penetration testing performed.

Requirement 12.3.2 - Not Applicable. Ixopay does not use a customized approach for any applicable PCI requirements.

Requirement A1.1.1; A1.1.2; A1.1.3; A1.1.4 - Not Applicable. The assessor reviewed the data flow narrative and diagrams, customer agreements, network diagram, business processes, interviewed relevant personnel, and verified that as part of the service offering customers do not have separate environments.

Requirement A2 - Not Applicable. Ixopay does not utilize POS/POI terminals.

Requirement A3 - Not Applicable. Ixopay is not required to perform the additional requirements for Designated Entities Supplemental Validation (DESV).

For any Not Tested responses, identify which subrequirements were not tested and the reason.

Not Applicable.



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 great the second of the secon	08 March 2024		
THOLE. This is the mot date that evidence was gi	attrorea, or observati	iono woro maac.	
Date Assessment ended:			20 July 2024
Note: This is the last date that evidence was go	athered, or observat	ions were made.	
Were any requirements in the ROC unable to b	e met due to a legal	constraint?	☐ Yes ⊠ No
Were any testing activities performed remotely	?		
If yes, for each testing activity below, indicate were performed:			
Examine documentation	⊠ Yes	□No	
Interview personnel		☐ No	
Examine/observe live data		☐ No	
Observe process being performed	⊠ Yes	☐ No	
Observe physical environment	☐ Yes	⊠ No	
Interactive testing	☐ Yes	⊠ No	
Other: Not Applicable.	☐ Yes	□No	



Section 3 Validation and Attestation Details

Part 3. PCI DSS Validation (ROC Section 1.7)

Indica Fue as Pae Base	ate below whether a full or partial all Assessment - All requirement Not Tested in the ROC. artial Assessment - One or more of Tested in the ROC. Any required on the results documented in the	in the ROC dated 20 July 2024. PCI DSS assessment was completed: It is have been assessed and therefore no requirements were marked as exercise requirements have not been assessed and were therefore marked as exercise not assessed is noted as Not Tested in Part 2g above. The ROC noted above, each signatory identified in any of Parts 3b-3d, compliance status for the entity identified in Part 2 of this document					
	ct one):	ompliance status for the entity identified in Fart 2 of this document					
	marked as being either In Place	PCI DSS ROC are complete, and all assessed requirements are or Not Applicable, resulting in an overall COMPLIANT rating; thereby compliance with all PCI DSS requirements except those noted as Not					
	marked as Not in Place, resulting	s of the PCI DSS ROC are complete, or one or more requirements are g in an overall NON-COMPLIANT rating; thereby (Service Provider nstrated compliance with PCI DSS requirements.					
	Target Date for Compliance:						
	,	th a Non-Compliant status may be required to complete the Action Confirm with the entity to which this AOC will be submitted before					
	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 (Service Provider Company Name) 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) The ROC was completed according to PCI DSS, Version 4.0 and was completed according to the instructions therein. \boxtimes 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 John Moltensmeyer Signature of Service Provider Executive Officer ↑ Date: 05 August 2024 Service Provider Executive Officer Name: John Noltensmeyer Title: Chief Information Security Officer 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 other assistance. If selected, describe all role(s) performed: Not Applicable. Signature of Lead QSA 1 Date: 05 August 2024 Lead QSA Name: Daniel Powers Signature of Duly Authorized Officer of QSA Company 1 Date: 05 August 2024 Duly Authorized Officer Name: Petar Besalev, QSA Company: A-LIGN **EVP Cybersecurity and Compliance Services** Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement If an ISA(s) was involved or assisted with ☐ ISA(s) performed testing procedures. this Assessment, indicate the role ☐ ISA(s) provided other assistance. performed: 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 Poquiroment		nt to PCI irements t One)	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	\boxtimes		
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	\boxtimes		
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			
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card- Present POS POI Terminal Connections			Not Applicable. Ixopay does not utilize POS/POI Terminal Connections.











