



# **Payment Card Industry (PCI) PIN Security Requirements**

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## **Attestation of Compliance for Onsite Assessments**

**For use with PIN Security Requirements v3.1**

**Revision 1.0b**

March 2021



## Section 1: Assessment Information

### Instructions for Submission

This Attestation of Compliance must be completed as a declaration of the results of the assessment of the subject entity compliance with the *Payment Card Industry PIN Security Requirements and Test Procedures* (PCI PIN). Complete all sections: The entity is responsible for ensuring that each section is completed by the relevant parties, as applicable. Contact the entity requesting the assessment ( e.g. Payment Brand) for reporting and submission procedures.

### Part 1. Entity and Qualified PIN Assessor (QPA) Information

#### Part 1a. Entity Organization Information

Company Name:	N&TS GROUP Networks & Transactional Systems Group S.p.A.				
DBA (doing business as):	N/A	Business Identifier:	N/A		
Contact Name:	Loredana Febelli	Title:	Compliance Manager		
Telephone:	+39 02 8227651	E-mail:	l.febelli@netsgroup.com		
Business Address:	Strada 4, palazzo A5 20057 Assago (MI) Italy		City:	Milan	
State/Province:	N/A	Country:	Italy	Postal Code:	20057
URL:	www.netsgroup.com				

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

Company Name:	Advantio Ltd				
Lead QPA Contact Name:	Domas Sadeckas	Title:	Senior Security Consultant		
Telephone:	+370 618 83255	E-mail:	domas.sadeckas@advantio.com		
Business Address:	Block 4, Harcourt Centre Harcourt Road		City:	Dublin	
State/Province:	N/A	Country:	Ireland	Postal Code:	2
URL:	www.advantio.com				



## Part 2. Executive Summary

### Part 2a. Scope Verification

**Services that were INCLUDED in the scope of the PCI PIN Assessment** (check all that apply):

Type of service(s) assessed:

- PIN Acquirer Payment Processing - POS
- PIN Acquirer Payment Processing - ATM
- Remote Key Distribution Using Asymmetric Keys – Operations
- Certification and Registration Authority Operations
- Key-injection Facilities
- 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 entity but were NOT INCLUDED in the scope of the PCI PIN Assessment** (check all that apply):

Type of service(s) not assessed:

- PIN Acquirer Payment Processing - POS
- PIN Acquirer Payment Processing - ATM
- Remote Key Distribution Using Asymmetric Keys - Operations
- Certification and Registration Authority Operations
- Key-injection Facilities
- Other (specify):

Provide a brief explanation why any checked services were not included in the assessment:

### Part 2b. Locations

List types of facilities (for example, data centers, key-injection facilities, certification authority operations, etc.) and a summary of locations included in the PCI PIN review.

Type of facility assessed:	Date of Assessment	Location(s) of facility (city, country):
<i>Example: Data Center</i>	<i>18-20 June, 2019</i>	<i>Boston, MA, USA</i>
Datacenter	24 November 2021	Milan, Italy
Datacenter	25 November 2021	Milan, Italy
Corporate Office	1 – 2 December 2021	Assago (MI) Italy
Datacenter	20 December 2021	Torino, Italy
Datacenter	1 December 2021	Frankfurt, Germany

### Part 2c. Summary of Requirements Tested

For each PCI PIN 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.

<b>Part 2c. Summary of Requirements Tested (continued)</b>				
<b>PCI PIN Control Objective</b>	<b>Details of Control Objectives Assessed</b>			<b>Justification for Approach</b> (Required for all "Partial" and "None" responses. Identify which sub-requirements were not tested and the reason.)
	<b>Full</b>	<b>Partial</b>	<b>None</b>	
Control Objective 1:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>1-1 is n/a. N&amp;TS is not responsible for management of POS terminals.</p> <p>1-4.b is n/a. HSMs are PTS validated.</p> <p>2-4 is n/a. N&amp;TS is not responsible for management of POS terminals.</p> <p>3-2 is n/a. N&amp;TS is not responsible for management of POS terminals.</p>
Control Objective 2:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Control Objective 3:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Control Objective 4:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	13-3, 13-4, 13-5 are n/a. The loading of plaintext secret or private key components or shares from an electronic medium is not used.
Control Objective 5:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	20-2 is n/a. All terminals operated by N&TS are interfacing with N&TS only.
Control Objective 6:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	23-1, 23-2, 23-3 are n/a. Reversible key-calculation methods are not used for key generation.
Control Objective 7:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	30-1, 30-2 are n/a. N&TS is not responsible for management of POS terminals.
Annex A1 – Control Objective 3:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Annex A1 – Control Objective 4:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Annex A1 – Control Objective 5:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Annex A1 – Control Objective 6:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Annex A2 – Control Objective 3	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Not applicable.</p> <p>N&amp;TS GROUP Networks &amp; Transactional Systems Group S.p.A. does not use Remote Key Distribution Using Asymmetric Techniques within their PIN environment.</p>


**Part 2c. Summary of Requirements Tested (continued)**

PCI PIN Control Objective	Details of Control Objectives Assessed			Justification for Approach (Required for all "Partial" and "None" responses. Identify which sub-requirements were not tested and the reason.)
	Full	Partial	None	
Annex A2 – Control Objective 4:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Not applicable.</b> <b>N&amp;TS GROUP Networks &amp; Transactional Systems Group S.p.A. does not use Remote Key Distribution Using Asymmetric Techniques within their PIN environment.</b>
Annex A2 – Control Objective 5:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Not applicable.</b> <b>N&amp;TS GROUP Networks &amp; Transactional Systems Group S.p.A. does not use Remote Key Distribution Using Asymmetric Techniques within their PIN environment.</b>
Annex A2 – Control Objective 6:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Not applicable.</b> <b>N&amp;TS GROUP Networks &amp; Transactional Systems Group S.p.A. does not use Remote Key Distribution Using Asymmetric Techniques within their PIN environment.</b>
Annex A2 – Control Objective 7:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Not applicable.</b> <b>N&amp;TS GROUP Networks &amp; Transactional Systems Group S.p.A. does not use Remote Key Distribution Using Asymmetric Techniques within their PIN environment.</b>
Annex B – Control Objective 1:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Not applicable.</b> <b>N&amp;TS GROUP Networks &amp; Transactional Systems Group S.p.A. does not provide Key-Injection Facilities' services.</b>
Annex B – Control Objective 2:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Not applicable.</b> <b>N&amp;TS GROUP Networks &amp; Transactional Systems Group S.p.A. does not provide Key-Injection Facilities' services.</b>
Annex B – Control Objective 3:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Not applicable.</b> <b>N&amp;TS GROUP Networks &amp; Transactional Systems Group S.p.A. does not provide Key-Injection Facilities' services.</b>
Annex B – Control Objective 4:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Not applicable.</b> <b>N&amp;TS GROUP Networks &amp; Transactional Systems Group S.p.A. does not provide Key-Injection Facilities' services.</b>
Annex B – Control Objective 5:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Not applicable.</b>


**Part 2c. Summary of Requirements Tested (continued)**

PCI PIN Control Objective	Details of Control Objectives Assessed			Justification for Approach (Required for all "Partial" and "None" responses. Identify which sub-requirements were not tested and the reason.)
	Full	Partial	None	
				<b>N&amp;TS GROUP Networks &amp; Transactional Systems Group S.p.A does not provide Key-Injection Facilities' services.</b>
Annex B – Control Objective 6:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Not Not applicable.</b> <b>N&amp;TS GROUP Networks &amp; Transactional Systems Group S.p.A does not provide Key-Injection Facilities' services..</b>
Annex B – Control Objective 7:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Not applicable.</b> <b>N&amp;TS GROUP Networks &amp; Transactional Systems Group S.p.A does not provide Key-Injection Facilities' services.</b>



## Section 2: Report on Compliance

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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:	<i>31 December 2021</i>	
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 type="checkbox"/> Yes	<input checked="" type="checkbox"/> No





## Section 3: Validation and Attestation Details

### Part 3. PCI PIN Validation

This AOC is based on results noted in the ROC dated **31 December 2021**.

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

<input checked="" type="checkbox"/>	<p><b>Compliant:</b> All sections of the PCI PIN ROC are complete, all questions answered affirmatively, resulting in an overall <b>COMPLIANT</b> rating; thereby <i>N&amp;TS GROUP Networks &amp; Transactional Systems Group S.p.A</i>) has demonstrated full compliance with the PCI PIN Security Requirements.</p>						
<input type="checkbox"/>	<p><b>Non-Compliant:</b> Not all sections of the PCI PIN ROC are complete, or not all questions are answered affirmatively, resulting in an overall <b>NON-COMPLIANT</b> rating, thereby <i>(Service Provider Company Name)</i> has not demonstrated full compliance with the PCI PIN Security Requirements.</p> <p><b>Target Date</b> 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 type="checkbox"/>	<p><b>Compliant but with Legal exception:</b> 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" style="width: 100%;"> <thead> <tr> <th style="width: 35%;">Affected Requirement</th> <th>Details of how legal constraint prevents requirement being met</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Affected Requirement	Details of how legal constraint prevents requirement being met				
Affected Requirement	Details of how legal constraint prevents requirement being met						

### Part 3a. Acknowledgement of Status

Signatory(s) confirms:

**(Check all that apply)**

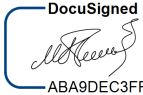
<input checked="" type="checkbox"/>	The ROC was completed according to the <i>PCI PIN Security Requirements and Testing Procedures, Version 3.1</i> , and was completed according to the instructions therein.
<input checked="" type="checkbox"/>	All information within the above-referenced ROC and in this attestation fairly represents the results of my assessment in all material respects.
<input checked="" type="checkbox"/>	I have read the PCI PIN and I recognize that I must maintain PCI PIN 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 PIN requirements that apply.



### Part 3b. Assessed Entity PIN Security Attestation

<i>Signature of Executive Officer of Assessed Entity</i> ↑		Firmato digitalmente da: <b>FEDERICI STEFANIA</b> <b>RAPPRESENTANTE LEGALE</b>
<i>Assessed Entity Executive Officer Name:</i>		Firmato il 16/02/2022 10:56
<i>Title:</i>	<b>Chief Financial Officer</b>	Seriale Certificato: 606000719473309852891391851601139599 Valido dal 20/04/2021 al 19/04/2024 ArubaPEC S.p.A. NG CA 3
<i>Date:</i>		

### Part 3c. Qualified PIN Assessor (QPA) Company Acknowledgement

Describe the role performed by the QPA and others that participated from within the QPA Company:	<i>QPA performed all activities related to this assessment</i>
DocuSigned by:  ABA9DEC3FF57486...	
<i>Signature of Duly Authorized Officer of QPA Company</i> ↑	<i>Date:</i> 2/16/2022
<i>Duly Authorized Officer Name:</i> Martin Petrov	<i>QPA Company:</i> Advantio Ltd



## Part 4. Action Plan for Non-Compliant Requirements

Select the appropriate response for “Compliant to PCI PIN” 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 PIN Control Objective	Description of Control Objective	Compliant to PCI PIN Control Objective (Select One)		Remediation Date and Actions (If “NO” selected for any Control Objective)
		YES	NO	
Control Objective 1:	PINs used in transactions governed by these requirements are processed using equipment and methodologies that ensure they are kept secure.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Control Objective 2:	Cryptographic keys used for PIN encryption/decryption and related key management are created using processes that ensure that it is not possible to predict any key or determine that certain keys are more probable than other keys.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Control Objective 3:	Keys are conveyed or transmitted in a secure manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Control Objective 4:	Key-loading to HSMs and POI PIN-acceptance devices is handled in a secure manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Control Objective 5:	Keys are used in a manner that prevents or detects their unauthorized usage.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Control Objective 6:	Keys are administered in a secure manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Control Objective 7:	Equipment used to process PINs and keys is managed in a secure manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Annex A1 – Control Objective 3:	Keys are conveyed or transmitted in a secure manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Annex A1 – Control Objective 4:	Key-loading to HSMs and POI PIN-acceptance devices is handled in a secure manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Annex A1 – Control Objective 5:	Keys are used in a manner that prevents or detects their unauthorized usage.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Annex A1 – Control Objective 6:	Keys are administered in a secure manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Annex A2 – Control Objective 3	Keys are conveyed or transmitted in a secure manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	



PCI PIN Control Objective	Description of Control Objective	Compliant to PCI PIN Control Objective (Select One)		Remediation Date and Actions (If "NO" selected for any Control Objective)
		YES	NO	
Annex A2 – Control Objective 4:	Key-loading to HSMs and POI PIN-acceptance devices is handled in a secure manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Annex A2 – Control Objective 5:	Keys are used in a manner that prevents or detects their unauthorized usage.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Annex A2 – Control Objective 6:	Keys are administered in a secure manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Annex A2 – Control Objective 7:	Equipment used to process PINs and keys is managed in a secure manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Annex B – Control Objective 1:	PINs used in transactions governed by these requirements are processed using equipment and methodologies that ensure they are kept secure.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Annex B – Control Objective 2:	Cryptographic keys used for PIN encryption/decryption and related key management are created using processes that ensure that it is not possible to predict any key or determine that certain keys are more probable than other keys.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Annex B – Control Objective 3:	Keys are conveyed or transmitted in a secure manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Annex B – Control Objective 4:	Key-loading to HSMs and POI PIN-acceptance devices is handled in a secure manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Annex B – Control Objective 5:	Keys are used in a manner that prevents or detects their unauthorized usage.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Annex B – Control Objective 6:	Keys are administered in a secure manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Annex B – Control Objective 7:	Equipment used to process PINs and keys is managed in a secure manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

