



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:	N&TS GROUP Networks & Transactional Systems Group S.p.A.	DBA (doing business as):	N&TS GROUP		
Contact Name:	Loredana Febelli	Title:	Compliance Manager		
Telephone:	+39 028227651	E-mail:	l.febelli@netsgroup.com		
Business Address:	Strada 4, palazzo A5	City:	Assago		
State/Province:	Milan	Country:	Italy	Zip:	20057
URL:	www.netsgroup.com				

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

Company Name:	Advantio Ltd.				
Lead QSA Contact Name:	Alessandro Amalfitano	Title:	QSA, PA-QSA, SSF SSA and SSLC		
Telephone:	+39 081 625180	E-mail:	alessandro.amalfitano@advantio.com		
Business Address:	Block 4, Harcourt Centre Harcourt Road	City:	Dublin 2		
State/Province:	Dublin	Country:	Ireland	Zip:	D2
URL:	www.advantio.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:		N&TS GROUP Payment Gateway	
Type of service(s) assessed:			
Hosting Provider: <input checked="" type="checkbox"/> Applications / software <input type="checkbox"/> Hardware <input checked="" type="checkbox"/> Infrastructure / Network <input type="checkbox"/> Physical space (co-location) <input type="checkbox"/> Storage <input checked="" 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 checked="" type="checkbox"/> Other processing (specify): Authorization	
<input type="checkbox"/> Account Management	<input 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 checked="" 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: Not Applicable

Type of service(s) not assessed:

Hosting Provider:	Managed Services (specify):	Payment Processing:
<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):	<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):	<input type="checkbox"/> POS / card present <input type="checkbox"/> Internet / e-commerce <input 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:		Not Applicable

Part 2b. Description of Payment Card Business

Describe how and in what capacity your business stores, processes, and/or transmits cardholder data.

N&TS Group Networks & Transactional Systems Group S.p.A. (N&TS GROUP hereafter) is an Italian Company which was established in 1995 to provide technology services to multinational retailers and financial services organisations. N&TS GROUP serves banks and acquirers to facilitate the processing of credit card transactions. The headquarter office is located in Assago (Milan), Italy.

N&TS GROUP provides several types of services. They function as a gateway for those who process face-to-face transactions through POS terminals.

N&TS GROUP also provides a website form for e-commerce payments, and processes transactions when customers pay.

N&TS GROUP stores cardholder data for 6-24 months depending on the contract with the customer for chargeback requests. N&TS GROUP



	<p>also provides a protocol conversion service, ACFS, that acts as a gateway allowing customers to use the N&TS GROUP's Terminal Manager to convert transactions to other ISO formats allowing them to process payments through a variety of acquirers.</p> <p>N&TS GROUP manages 500 million transactions each year.</p>
Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data.	Not Applicable.

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
Corporate main office	1	Assago (Milan), Italy
Colt Data Center	2	Milan (Italy) Turin (Italy)
Equinix Data Centers	4	Secaucus (United States) Ashburn (United States) Basiglio (Italy) Frankfurt (Germany).

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)
ACFS	5.2.x	N&TS GRUOP	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	28th October 2019
FTFS	5.3.2.x	N&TS GRUOP	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	28th October 2022
FTFS	5.3.4.x	N&TS GRUOP	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	28th October 2022
ACFS	5.3.0.Z	N&TS GRUOP	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	28th October 2022
IGFS	5.4.0.z	N&TS GRUOP	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	28th October 2022
IGFS	5.5.0.z	N&TS GRUOP	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	28th October 2022
			<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.*

N&TS GROUP processes payments, acts as Payment Gateway and manages settlement and chargeback phases.

As payments enter N&TS GROUP's network they are processed through the PA-DSS validated applications (FTFS and IGFS) on their Terminal Management servers where credit card information is stored for a short time until it is sent to the acquirer as batch files for settlement. Customers terminate MPLS connections at the N&TS GROUP's firewall where specific ports are opened allowing transactions to be processed directly through N&TS GROUP's Terminal Manager.

The Cardholder Data Environment (CDE) is completely segmented and segregated (physically and logically) from the N&TS GROUP's internal network. All systems in the CDE are managed by N&TS GROUP in the Data Centers at Colt Telecom (Milan, Turin in Italy) and Equinix (Secaucus, Ashburn in USA, Basiglio in Italy and Frankfurt in Germany).

N&TS GROUP has no direct connectivity to any payment card company and transmits payments for processing to the appropriate Payment Processor through private lines or VPN connections.

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:	Not Applicable
QIR Individual Name:	Not Applicable
Description of services provided by QIR:	Not Applicable

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:
SIA S.p.A.	Transmission (network) of encrypted data and processes payment information to the International Brands for authorization request.
Transaction Network Services (TNS)	Transmission (network) of encrypted data and processes payment information to the International Brands for authorization request.
Colt Telecom	N&TS GROUP rents racks space at Colt Data Centers located in Milan and Turin (Italy). All systems are owned and managed by N&TS GROUP.
Equinix, Inc.	N&TS GROUP rents racks space at Equinix Data Centers located in Secaucus, Ashburn (United States), Basiglio (Italy) and Frankfurt (Germany). All systems are owned and managed by N&TS GROUP.

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:		N&TS GROUP Payment Gateway		
PCI DSS Requirement	Details of Requirements Assessed			Justification for Approach <small>(Required for all “Partial” and “None” responses. Identify which sub-requirements were not tested and the reason.)</small>
	Full	Partial	None	
Requirement 1:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1.2.2: Not applicable. There are no routers in scope.
Requirement 2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2.1.1: Not applicable. There are no wireless environments connected to the cardholder data environment or transmitting cardholder data. 2.6: Not applicable. The assessed entity is not a shared hosting provider.
Requirement 3:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3.4.1: Not applicable. Disk encryption is not used.
Requirement 4:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4.1.1: Not applicable. Wireless networks are not in scope.
Requirement 5:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 6:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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: Not applicable. No vendor accounts or vendor remote access is allowed to access the CDE. 8.5.1: Not applicable. The assessed entity is a service provider, but it does not have any access to customer premises.
Requirement 9:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	9.5.1: Not applicable. Media backups are not used.



				<p>9.6.2: Not applicable. The assessed entity does not distribute or send any media containing cardholder data.</p> <p>9.6.3: Not applicable. The assessed entity does not distribute or send any media containing cardholder data.</p> <p>9.8.1: Not applicable. Cardholder data is not stored on paper.</p> <p>9.9, 9.9.1, 9.9.2, 9.9.3: Not applicable. The assessed entity does not utilize devices that capture payment card data via direct physical interaction.</p>
Requirement 10:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 11:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 12:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Appendix A1:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The assessed entity is not a Shared Hosting Provider
Appendix A2:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The assessed entity doesn't use SSL / early TLS for POS POI terminal connections



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:	22 December 2021
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 DSS Validation

This AOC is based on results noted in the ROC dated 22 December 2021.

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 checked="" type="checkbox"/>	<p>Compliant: All sections of the PCI DSS ROC are complete, all questions answered affirmatively, resulting in an overall COMPLIANT rating; thereby N&TS GROUP Networks & Transactional Systems Group S.p.A. has demonstrated full compliance with the PCI DSS.</p>						
<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 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" 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 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)

<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	ASV scans are being completed by the PCI SSC Approved Scanning Vendor Qualys


Part 3b. Service Provider Attestation

DocuSigned by:

 467C5E13B61242C...

<i>Signature of Service Provider Executive Officer</i> ↑	<i>Date:</i> 22 December 2021
<i>Service Provider Executive Officer Name:</i> Stefania Federici	<i>Title:</i> Chief Financial Officer

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

If a QSA was involved or assisted with this assessment, describe the role performed:	The QSA performed a full PCI DSS assessment.
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DocuSigned by:

 ABA9DEC3FF57486...

<i>Signature of Duly Authorized Officer of QSA Company</i> ↑	<i>Date:</i> 22 December 2021
<i>Duly Authorized Officer Name:</i> Martin Petrov	<i>QSA Company:</i> Advantio 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:	Not Applicable
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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"/>	

