

# Payment Card Industry (PCI) Data Security Standard

Attestation of Compliance for Onsite Assessments – Service Providers

Version 3.1

April 2015



#### **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 Infor      | rmation                                 |                          | 77.15.00<br>- Nai-           |       |  |
| Company Name:  | Ecwid Inc.              |   | DBA (doing business as): | N/A                          |       |  |
| Contact Name:  | Kirill Kazakov          |   | Title:                   | Information Security Officer |       |  |
| ISA Name(s) (if applicable):   | N/A                     |   | Title:                   | N/A                          |       |  |
| Telephone:   | (410) 236-6551          | *************************************** | E-mail:                  | kirikaza@ecwid.com           |       |  |
| Business Address:  | 144 West D Stree<br>103 | 144 West D Street, Suite<br>103         |                          | Encinitas                    |       |  |
| State/Province:  | CA                      | US                                      | -                        | Zip:                         | 92024 |  |
| URL:   | http://www.ecwid.com    |   |                          |                              |       |  |
|  |                         |   |                          |                              |       |  |

| Part 1b. Qualified Secur | ity Assessor                             | Company Inforn                            | nation (if ap | plicable)                 |       |  |
|--------------------------|--|---|---------------|---------------------------|-------|--|
| Company Name:            | Skoda Mine                               | Skoda Minotti Risk Advisory Services, LLC |               |                           |       |  |
| Lead QSA Contact Name:   | Joseph Co                                | mpton                                     | Title:        | Principal                 |       |  |
| Telephone:               | 440.605.7252                             |   | E-mail:       | jcompton@skodaminotti.com |       |  |
| Business Address:        | 201 East Kennedy<br>Boulevard Suite 1500 |   | City:         | Tampa                     |       |  |
| State/Province:          | FL                                       | Country:                                  | US Zip: 336   |                           | 33602 |  |
| URL:                     | http://risk.s                            | kodaminotti.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: Ecwid E-commerce Platform Type of service(s) assessed: **Hosting Provider:** Managed Services (specify): Payment Processing: ☐ Applications / software ☐ Systems security services POS / card present ☐ Hardware ☐ IT support ☐ Infrastructure / Network ☐ Physical security ☐ MOTO / Call Center ☐ Physical space (co-location) ☐ Terminal Management System $\square$ ATM ☐ Storage Other services (specify): Other processing (specify): Web ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Shared Hosting 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): 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.



# 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:   | None   | None   |  |  |  |  |  |
|--|--|--|--|--|--|--|--|
| Type of service(s) not assessed:   |  |  |  |  |  |  |  |
| Hosting Provider:  Applications / software Hardware Infrastructure / Network Physical space (co-location) Storage Web Security services 3-D Secure Hosting Provider Shared Hosting Provider Other Hosting (specify): | Managed Services (specify):  ☐ Systems security services ☐ IT support ☐ Physical security ☐ Terminal Management System ☐ Other services (specify): | Payment Processing:  POS / card present Internet / e-commerce MOTO / Call Center ATM Other processing (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 checked services were not included in the assessment:  |  |  |  |  |  |  |



#### Part 2b. Description of Payment Card Business

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

Ecwid Inc, (Ecwid) provides a software-as-a-service product that allows it's customers to host payment widgets on their own websites, or as part of their own service e-commerce webstore offering. Cardholder data that includes the customer name, address, primary account number (PAN), expiration date, and CVV2, CVC2, CID, or CAV2 is transmitted directly from customer browsers to the merchant's (customer) selected payment processors via JavaScript or iFrames that are provided by the selected payment processors directly, or by securely re-transmitting cardholder data directly to the payment processor, having never stored or processed cardholder data.

Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data.

Ecwid does not store or process cardholder data, but provides payment appliations that allow a customer to communicate directly with the payment processor, or by securely re-transmitting chardholder data to the payment processor directly. These payment applications can still impact the security of cardholder data, so Ecwid has chosen to include their entire payment application system within the scope of their Cardholder Data Environment validation assessment.

#### 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):   |
|---|-----------------------------------|--|
| Example: Retail outlets                           | 3                                 | Boston, MA, USA  |
| Infrastucture as a Service Cloud hosting provider | 2                                 | US (region: us-east-1 availability zones B,D, & E) Germany (region: eu-central-1 availability zones A & B) |
|   |                                   |  |
|   |                                   |  |
|   |                                   |  |
|   |                                   |  |



| Standards Council  |  |             |                   |                               |                             |  |
|--|--|-------------|-------------------|-------------------------------|-----------------------------|--|
| Part 2d. Payment App   | lications  |             |                   |                               |                             |  |
| Does the organization use  | one or more  | Payment     | Application       | s? ☐ Yes        No            |                             |  |
| Provide the following inform   | mation regard  | ding the P  | ayment App        | lications your organiza       | tion uses:                  |  |
| Payment Application<br>Name  | Version<br>Number  | 1           | lication<br>endor | Is application PA-DSS Listed? |                             | isting Expiry<br>applicable)   |
|  |  |             |                   | ☐ Yes ☐ No                    |                             |  |
|  |  |             |                   | ☐ Yes ☐ No                    |                             |  |
|  |  |             |                   | ☐ Yes ☐ No                    |                             |  |
| Part 2e. Description of  | Environmer   | nt .        |                   |                               |                             |  |
| Provide a <u>high-level</u> 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.  Ecwid's Cardholder Data Environment (CDE) is hosted on the AWS virtual private cloud (VPC) Infrastructure as a Service (laaS) platform across three availability zones in the AWS U East Region (us-east-1) and two availability zones in Europe Central Region (eu-central-1). Ecwid does not store or process cardholder data within its hosting environment. Ecwid hosts the payment web forms and widgets that are displayed to merchant customer's browsers; however, these web forms contain either JavaScript or iFrames provided by payment processor, and the payment card data is transmittee from the client browsers directly to the payment processor never passing through Ecwid's systems. Ecwid does have a single payment processing entity where it securely accepts CHD from the client browser, never storing or processing CHD. |  |             |                   |                               |                             | the AWS US es in Europe tore or onment. s that are wever, these provided by is transmitted processor does have a ely accepts retransmits |
| Does your business use no environment?   | etwork segme   | entation to | affect the s      | cope of your PCI DSS          | ,                           | ⊠ Yes  |
| (Refer to "Network Segment   | ntation" sectio  | on of PCI   | DSS for gui       | dance on network segr         | nentation)                  | ☐ No   |
|  | an a san |             |                   |                               | nexos, o e "sa, o comencion |  |
| Part 2f. Third-Party Sei   |  | 0.000       |                   |                               |                             |  |
| Does your company have a relationship with one or more third-party service providers (for example, 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?  |  |             |                   |                               |                             |  |
| If Yes:  |  |             |                   |                               |                             |  |
| Type of service provider:  | Descr  | iption of   | services pr       | ovided:                       |                             |  |
| Infrastructure Cloud Hosting<br>Provider   | Infrastructure Cloud Hosting Infrastructure services including compute, network, storage and log management.   |             |                   |                               |                             | g  |
|  |  |             |                   |                               |                             |  |

| Security<br>Standards Council |                        |                  |   |  |
|-------------------------------|------------------------|------------------|---|--|
|                               | -                      |                  | A 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 |  |
|                               | ·                      |                  |   |  |
|                               |                        |                  |   |  |
| Note: Requirement 12.8 a      | pplies to all entition | es 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: |      | Ecwid E-commerce Platform |                                  |   |  |  |
|---------------------------|------|---------------------------|----------------------------------|---|--|--|
|                           |      |                           | Details of Requirements Assessed |   |  |  |
| PCI DSS<br>Requirement    | Full | Partial No                |                                  | Justification for Approach  (Required for all "Partial" and "None" responses. Identify which sub-requirements were not tested and the reason.)  |  |  |
| Requirement 1:            |      |                           |                                  | 1.1.6 - Not Applicable – No insecure services, protocols, and ports were used. 1.3.7 - Not Applicable - No CHD is stored to a disk or database.   |  |  |
| Requirement 2:            |      |                           |                                  | 2.1.1 - Not Applicable - Wireless networks are not connected to the CDE.  2.2.3 - Not Applicable - No unnnecessary or insecure services or protocols are in use.  2.6 - Not Applicable - Entity is not a shared hosting provider.   |  |  |
| Requirement 3:            |      |                           |                                  | 3.1 - Not applicable - No CHD is stored to disk or to a database.  3.2 - Not applicable - Entity is not a payment card issuer and does not store sensitive data.  3.4.1, 3.5, 3.5.1, 3.5.2, 3.5.3, 3.6, 3.6.1 - 3.6.8 - Not Applicable - Entity does not store CHD to disk or database and therefore removable media and key management procedures are not necessary with the CDE |  |  |
| Requirement 4:            |      | $\boxtimes$               |                                  | 4.1.1 - Not Applicable - Wireless networks are not used within or connected to the CDE.   |  |  |



| Requirement 5:  |             |             |  | 5.1, 5.1.1, 5.2, 5.3 - Not Applicable - Operating   |
|-----------------|-------------|-------------|--|---|
|                 |             |             |  | systems used within the CDE are not commonly affected with viruses based on deployment standards                    |
| Requirement 6:  |             |             |  |   |
| Requirement 7:  | $\boxtimes$ |             |  |   |
| Requirement 8:  |             |             |  | 8.1.5- Not Applicable - Entity does not provide remote access to CDE to vendors.                                    |
|                 |             |             | Community of the Control of the Cont | 8.5.1 - Not Applicable - Entity does not provide services that require remote access to customer systems.           |
|                 |             |             |  | 8.7 - Not Applicable - No CHD is stored to disk or database wihtin the CDE.   |
| Requirement 9:  |             | ×           |  | 9.5-9.8.2 - Not Applicable - Entity does not store or process CHD.  |
|                 |             |             | T .  | 9.9 - 9.9.3 - Not Applicable - Entity does not process card present transactions.                                   |
| Requirement 10: |             |             |  | 10.2.1 - Not Applicable - Entity does not store or process CHD and does not provide user access to cardholder data. |
| Requirement 11: |             | $\boxtimes$ |  | 11.1.1 - Not Applicable - Entity does not have authorized wireless connections to or wihtin the CDE.                |
| Requirement 12: |             |             |  |   |
| Appendix A:     |             | . 🔲         | $\boxtimes$  | N/A Ecwid is not a shared hosting provider  |



### **Section 2: Report on Compliance**

| This Attestation of Compliance reflects the results of an onsite assessm accompanying Report on Compliance (ROC). | ent, which is do | ocumented in an |
|---|------------------|-----------------|
| The assessment documented in this attestation and in the ROC was completed on:                                    | 6/30/2016        |                 |
| Have compensating controls been used to meet any requirement in the ROC?  | ☐ Yes            | ⊠ No            |
| Were any requirements in the ROC identified as being not applicable (N/A)?  | ⊠ Yes            | □No             |
| Were any requirements not tested?   | ☐ Yes            | ⊠ No            |
| Were any requirements in the ROC unable to be met due to a legal constraint?                                      | ☐ Yes            | ⊠ No            |



 $\boxtimes$ 

## **Section 3: Validation and Attestation Details**

| Part        | 3. PCI DSS Validation   |
|-------------|---|
| applical    | on the results noted in the ROC dated <i>June 30, 2016</i> , the signatories identified in Parts 3b-3d, as ole, assert(s) the following compliance status for the entity identified in Part 2 of this document as of 0, 2016: (check one):  |
|             | <b>Compliant:</b> All sections of the PCI DSS ROC are complete, all questions answered affirmatively, resulting in an overall <b>COMPLIANT</b> rating; thereby <i>Ecwid, Inc.</i> has demonstrated full compliance with the PCI DSS.  |
|             | <b>Non-Compliant:</b> Not all sections of the PCI DSS ROC are complete, or not all questions are answered affirmatively, resulting in an overall <b>NON-COMPLIANT</b> rating, thereby (Service Provider Company Name) has not demonstrated full compliance with the PCI DSS.  |
|             | Target Date for Compliance:   |
|             | 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. Check with the payment brand(s) before completing Part 4.   |
|             | 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.  If checked, complete the following:  Affected Requirement  Details of how legal constraint prevents requirement being met |
| Part        | 3a. Acknowledgement of Status   |
| Sign        | atory(s) confirms:  |
| (Che        | ck all that apply)  |
| $\boxtimes$ | The ROC was completed according to the PCI DSS Requirements and Security Assessment Procedures, Version 3.1), 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 my assessment in all material respects.  |
|             | I have confirmed with my payment application vendor that my payment system does not store sensitive authentication data after authorization.  |
| $\boxtimes$ | I have read the PCI DSS and I recognize that I must maintain PCI DSS compliance, as applicable to my environment, at all times.   |

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 (co  | ntinued)                           | Land 1995 Control of the Control of |   |  |  |
|--|--|------------------------------------|---|---|--|--|
| No evidence of full track data <sup>1</sup> , CAV2, CVC2, CID, or CVV2 data <sup>2</sup> , or PIN data <sup>3</sup> storage after transaction authorization was found on ANY system reviewed during this assessment. |  |                                    |   |   |  |  |
| $\boxtimes$  | ASV scans are being completed by the PCI SSC Approved Scanning Vendor Coalfire Systems, Inc. #3782-01-08 |                                    |   |   |  |  |
| A STATE SHEET, ST  |  |                                    | Middle Source (Aggreen, 1881) The Source Office of Manager F  | ACE TO THE TOTAL PROPERTY CONTRACTORS AND |  |  |
| Part   | 3b. Service Provider Attestation   |                                    |   |   |  |  |
| 9  | ames O Hara  |                                    |   |   |  |  |
| Sign   | ature of Service Provider Executive Offic  | er ↑                               | Date: JULY 6,   | 2016                                      |  |  |
| Serv   | ice Provider Executive Officer Name: Jin   | n O'Hara                           | Title: President  |   |  |  |
| Part   | 3c. QSA Acknowledgement (if appl   |                                    |   |   |  |  |
|  | QSA was involved or assisted with this ssment, describe the role performed:                              | Joe Compton, Primatesting results. | ary QSA Responsible for ROC   | validation and                            |  |  |
|  | Bejamin Osbrach  |                                    |   |   |  |  |
| Sigr   | nature of Duly Authorized Officer of QSA   | Company ↑                          | Date: June 30, 2016   |   |  |  |
|  | Authorized Officer Name: Benjamin Os   |                                    | QSA Company: Skoda<br>Advidory Services, LLC  | Minotti Risk                              |  |  |
| Part   | 3d. ISA Acknowledgement (if applied  | cable)                             |   |   |  |  |
|  | ISA was involved or assisted with this ssment, describe the role performed:                              |                                    |   |   |  |  |
|  |  |                                    |   | ·   |  |  |
| Sia  | nature of ISA ↑  |                                    | Date:   |   |  |  |
| J. 91  | 141410 01 101 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.

<sup>&</sup>lt;sup>2</sup> 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

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<br>Requirement | DSS Req   | int to PCI<br>uirements<br>of One) | Remediation Date and Actions (If "NO" selected for any Requirement) |              |  |
|------------------------|---|------------------------------------|---|--------------|--|
|                        |   | YES                                | NO  | Requirementy |  |
| 1                      | Install and maintain a firewall configuration to protect cardholder data                        |                                    |   |              |  |
| 2                      | Do not use vendor-supplied defaults for system passwords and other security parameters          |                                    |   |              |  |
| 3                      | Protect stored cardholder data  |                                    |   |              |  |
| 4                      | Encrypt transmission of cardholder data across open, public networks                            |                                    |   |              |  |
| 5                      | Protect all systems against<br>malware and regularly update anti-<br>virus software or programs |                                    |   |              |  |
| 6                      | Develop and maintain secure systems and applications  |                                    |   |              |  |
| 7                      | Restrict access to cardholder data by business need to know                                     |                                    |   |              |  |
| 8                      | Identify and authenticate access to system components   | $\boxtimes$                        |   |              |  |
| 9                      | Restrict physical access to cardholder data   |                                    |   |              |  |
| 10                     | Track and monitor all access to<br>network resources and cardholder<br>data                     |                                    |   |              |  |
| 11                     | Regularly test security systems and processes   | ×                                  |   |              |  |
| 12                     | Maintain a policy that addresses information security for all personnel                         |                                    |   |              |  |









