



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:	Network Merchants, LLC	DBA (doing business as):	Not Applicable		
Contact Name:	Jeremy Gumbley	Title:	Chief Security/Information Officer		
Telephone:	+1 (800) 868-1832	E-mail:	jeremy.gumbley@nmi.com		
Business Address:	201 E. Main Rd	City:	Roselle		
State/Province:	IL	Country:	USA	Zip:	60172
URL:	http://www.networkmerchants.com				

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

Company Name:	Trustwave				
Lead QSA Contact Name:	Jimmie Rutledge	Title:	QSA		
Telephone:	(312) 873-7500	E-mail:	jrutledge@trustwave.com		
Business Address:	70 West Madison Street Suite 600	City:	Chicago		
State/Province:	IL	Country:	USA	Zip:	60602
URL:	http://www.trustwave.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: Network Merchants Payment Gateway, Merchant Services

Type of service(s) 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):
Online Portal
Batch Processing
API Integration

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):

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:

- 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

<p>Describe how and in what capacity your business stores, processes, and/or transmits cardholder data.</p>	<p>Network Merchants, LLC (NMI) provides an electronic payment gateway for transaction processing and is considered a Level 1 Service Provider.</p> <p>NMI provides merchant services including an online portal, API integration and batch processing. NMI also offers business affiliates the ability to market its merchant services to other business associates.</p> <p>NMI accepts Visa, MasterCard, American Express, Discover, JCB and Diners Club. Cardholder data (PAN, cardholder name, expiration date, card security code or full track data) is received from merchants over the Internet through TLS 1.2 (AES-128, AES-256) for processing and then transmitted to the upstream processors over IPsec VPN or HTTPS, using TLS 1.2 (AES-128, AES-256) connections.</p> <p>All cardholder data (PAN, cardholder name, expiry) is stored [REDACTED] with AES-128-bit encryption and stored for a retention period of 36 months. In addition, PAN is stored through truncation of PANs (last four) [REDACTED]. In addition to storage for reporting, cardholder data that is stored [REDACTED] is also used for recurring transactions with the PAN encrypted with AES-128 bit. NMI does not maintain any direct connections to any card brands.</p>
<p>Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data.</p>	<p>Not applicable</p>

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):
Data Center	2	[REDACTED]
Main Offices	1	Roselle, IL, USA

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)
NMI Proxy Application	Not applicable	Network Merchants	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not applicable
NMI Settlement Application	Not applicable	Network Merchants	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not applicable
NMI Batch Processing Application	Not applicable	Network Merchants	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not applicable
NMI API.	Not applicable	Network Merchants	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not applicable

Part 2e. Description of Environment

Provide a **high-level** description of the environment covered by this assessment.

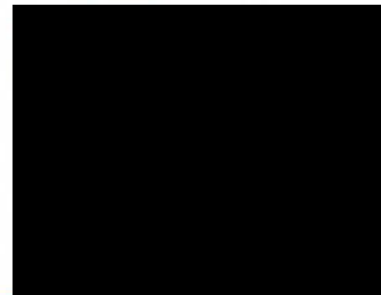
For example:

- *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.*

Technologies:

- Firewalls
- Switches
- Load Balancers
- Routers
- Operating Systems
- File Integrity Monitor Software
- Databases
- Intrusion Detection Systems
- Web Application Firewall
- Vulnerability Scanners
- Log Server
- Virtualization Platform
- Encryption Solution
- Laptop
- VPN Concentrator
- Processor Connections

Network Segments:





Internally Developed Applications:

- NMI Proxy Application
- NMI Settlement Application
- NMI Batch Processing Application
- NMI API

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:
[REDACTED]	System Hosting and Physical Security requirements.
[REDACTED]	System Hosting and Physical Security requirements.
[REDACTED]	Key injection of POI devices, cardholder data not being shared.

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:		Network Merchants Payment Gateway, Merchant Services		
PCI DSS Requirement	Details of Requirements Assessed			Justification for Approach (Required for all “Partial” and “None” responses. Identify which sub-requirements were not tested and the reason.)
	Full	Partial	None	
Requirement 1:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>2.1.1 – Not applicable. Network Merchants, LLC does not have any in-scope wireless environments.</p> <p>2.2.3 – Not applicable. Network Merchants, LLC does not have any enabled insecure services, daemons, or protocols</p> <p>2.6 – Not applicable. Network Merchants, LLC is not a Shared Hosting Provider.</p>
Requirement 3:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3.4.1 – Not applicable. Disk Encryption not in use.
Requirement 4:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4.1.1 – Not applicable. No wireless networks in scope for the assessment.
Requirement 5:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 6:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	6.4.6 – Not applicable. Network Merchants, LLC has not undergone any significant network infrastructure changes within the past 12 months.
Requirement 7:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 8:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8.1.5 – Not applicable. No third-party access to in-scope systems.
Requirement 9:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	9.6.2, 9.6.3 – Not applicable. No media moved off-site.

				<p>9.8.1 – Not applicable. No cardholder data in hardcopy material.</p> <p>9.9, 9.9.1, 9.9.2, 9.9.3 – Not applicable. No capture devices in scope for the assessment.</p>
Requirement 10:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 11:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>11.1.1 – Not applicable. Network Merchants, LLC does not maintain any authorized wireless access points as part of the cardholder data environment.</p> <p>11.2.3 – Not applicable. Not applicable. Network Merchants, LLC has not undergone any significant network infrastructure changes within the past 12 months.</p>
Requirement 12:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Appendix A1:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not applicable. Network Merchants, LLC is not classified as a shared hosting provider
Appendix A2:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Section 2: Report on Compliance

This Attestation of Compliance reflects the results of an onsite assessment, which is documented in an accompanying Report on Compliance (ROC).

The assessment documented in this attestation and in the ROC was completed on:	<i>March 27, 2019</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 DSS Validation

This AOC is based on results noted in the ROC dated *March 27, 2019*.

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 <i>Network Merchants, LLC</i> 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>Network Merchants, LLC</i> has not demonstrated full compliance with the PCI DSS.</p> <p>Target Date for Compliance: 3/28/2019</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: 40%;">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, Version 3.2.1</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 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 <i>Trustwave</i>

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 3b. Service Provider Attestation

J. Gumbly

Signature of Service Provider Executive Officer ↑	Date: 27 MARCH 2019
Service Provider Executive Officer Name: J. GUMBLY	Title: CSO

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

If a QSA was involved or assisted with this assessment, describe the role performed:	QSA Jimmie Rutledge conducted the assessment and composed the Report on Compliance.
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Michael Aminzade

Signature of Duly Authorized Officer of QSA Company ↑	Date: March 27, 2019
Duly Authorized Officer Name: Michael Aminzade	QSA Company: Trustwave

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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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"/>	

