

Payment Card Industry (PCI) Data Security Standard

Attestation of Compliance

Prepared for:

Ixopay, Inc.

Date:

13 June 2025



A-LIGN.COM

Payment Card Industry Data Security Standard



Attestation of Compliance for Report on Compliance - Service Providers

Version 4.0.1

Publication Date: August 2024



PCI DSS v4.0.1 Attestation of Compliance for Report on Compliance - Service Providers

Entity Name: Ixopay, Inc

Date of Report as noted in the Report on Compliance: 13 June 2025

Date Assessment Ended: 13 June 2025



Section 1: Assessment Information

Instructions for Submission

This Attestation of Compliance (AOC) must be completed as a declaration of the results of the service provider's assessment against the *Payment Card Industry Data Security Standard (PCI DSS) Requirements and Testing Procedures ("*Assessment"). Complete all sections. The service provider is responsible for ensuring that each section is completed by the relevant parties, as applicable. Contact the entity(ies) to which this AOC will be submitted for reporting and submission procedures.

This AOC reflects the results documented in an associated Report on Compliance (ROC). Associated ROC sections are noted in each AOC Part/Section below.

Capitalized terms used but not otherwise defined in this document have the meanings set forth in the PCI DSS Report on Compliance Template.

Part 1. Contact Information		
Part 1a. Assessed Entity (ROC Section 1.1)		
Company name:	Ixopay, Inc.	
DBA (doing business as):	Not Applicable.	
Company mailing address:	333 E Main St #396, Lehi, Utah 84043 USA	
Company main website:	https://www.ixopay.com	
Company contact name:	Marc Phillips	
Company contact title:	GRC Director	
Contact phone number:	+1 (918) 706-5992	
Contact e-mail address:	m.phillips@ixopay.com	

Part 1b. Assessor (ROC Section 1.1)

Provide the following information for all assessors involved in the Assessment. If there was no assessor for a given assessor type, enter Not Applicable.

PCI SSC Internal Security Assessor(s)		
ISA name(s): Not Applicable.		
Qualified Security Assessor		
Company name:	A-LIGN Compliance and Security, Inc. dba A-LIGN	
Company mailing address:	400 N Ashley Drive Suite 1325, Tampa, Florida 33602 USA	
Company website:	https://www.A-LIGN.com	
Lead Assessor name:	Pritam Bankar	
Assessor phone number:	+1 (888) 702-5446	
Assessor e-mail address:	pritam.bankar@A-LIGN.com	
Assessor certificate number:	QSA, 206-072	



Part 2. Executive Summary				
Part 2a. Scope Verification				
Services that were <u>INCLUDED</u> in the scope of the Assessment (select all that apply):				
Name of service(s) assessed:	Tokenization Service including Browser and Mobile Implementations, Token Services API, Batch File Transfer Capability, Encrypted POI devices (owned and operated by customer), Ecommerce Package, Mobile API, and Transparent Gateway.			
Type of service(s) assessed:				
Hosting Provider: Applications / software Hardware Infrastructure / Network Physical space (co-location) Storage Web-hosting services Security services 3-D Secure Hosting Provider Multi-Tenant Service Provider Other Hosting (specify): Tokenization service provider	Managed Services: Systems security services IT support Physical security Terminal Management System Other services (specify):	Payment Processing: ☐ POI / 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	1	1		
Others (specify):				
Note: These categories are provided for assistance only and are not intended to limit or predetermine an entity's service description. If these categories do not apply to the assessed service, complete "Others." If it is not clear whether a category could apply to the assessed service, consult with the entity(ies) to which this AOC will be submitted.				



Part 2. Executive Summary (continued) Part 2a. Scope Verification (continued) Services that are provided by the service provider but were NOT INCLUDED in the scope of the Assessment (select all that apply): Name of service(s) not assessed: Not Applicable. Type of service(s) not assessed: **Hosting Provider: Managed Services: Payment Processing:** ☐ Applications / software ☐ Systems security services ☐ POI / card present ☐ Hardware ☐ IT support ☐ Internet / e-commerce ☐ MOTO / Call Center ☐ Infrastructure / Network ☐ Physical security ☐ Physical space (co-location) ☐ Terminal Management System \square ATM ☐ Storage Other services (specify): ☐ Other processing (specify): ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Multi-Tenant Service Provider ☐ Other Hosting (specify): ☐ Fraud and Chargeback ☐ Payment Gateway/Switch ☐ Account Management ☐ Back-Office Services ☐ Issuer Processing ☐ Prepaid Services ☐ Billing Management ☐ Loyalty Programs ☐ Records Management ☐ Tax/Government Payments ☐ Clearing and Settlement □ Network Provider Others (specify): Provide a brief explanation why any checked services Not Applicable. All services provided by Ixopay were were not included in the Assessment: included within the scope of this assessment. Part 2b. Description of Role with Payment Cards (ROC Sections 2.1 and 3.1) Describe how the business stores, processes, and/or Ixopay is a service provider providing tokenization transmits account data. services to their clients by utilizing API calls, encrypted devices (owned and operated by customer) and SFTP file uploads from clients. Ixopay also provides a JavaScript iFrame allowing users to enter cardholder data which is directed to Ixopay for tokenization and authorization on behalf of the merchant. Describe how the business is otherwise involved in or Ixopay specializes in the areas of e-commerce, has the ability to impact the security of its customers' compliance data security, and payments. Ixopay account data. develops solutions specifically designed for organizations processing payments including tokenization services. Tokenization of payment card



	data is achieved using API calls, encrypted POI devices, and file uploads using SFTP. The above services involves processing and transmitting of cardholder data that could impact the security of customers' account data.
Describe system components that could impact the security of account data.	Ixopay utilizes various system components that safeguard account data. This includes core infrastructure like virtual servers and databases, secure file transfer solutions for data exchange, and robust network security with firewalls and intrusion detection systems. Endpoint protection and monitoring tools such as antivirus, file integrity monitoring, application performance monitoring, and log aggregation are also critical, along with vulnerability scanning and secure remote access. Finally, dedicated payment APIs play a role in maintaining the security of sensitive account information.

Part 2c. Description of Payment Card Environment

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

For example:

- Connections into and out of the cardholder data environment (CDE).
- Critical system components within the CDE, such as POI devices, databases, web servers, etc., and any other necessary payment components, as applicable.
- System components that could impact the security of account data.

The assessed environment consisted of networks hosted within a PCI-compliant cloud service provider. Each network contained connections into and out of the CDE to support payment gateway connections.

Critical system components that support and could impact the security of account data include NSCs, Windows and Linux servers, and MSSQL database, SIEM and logging solution, MFA systems, and administrative workstations. Network security enforcement and segmentation include security groups and network access control lists.

Indicate whether the environment includes segmentation to reduce the scope of the Assessment.	⊠ Yes □ No
(Refer to the "Segmentation" section of PCI DSS for guidance on segmentation)	

Part 2d. In-Scope Locations/Facilities (ROC Section 4.6)

List all types of physical locations/facilities (for example, corporate offices, data centers, call centers and mail rooms) in scope for this Assessment.

Facility Type	Total Number of Locations (How many locations of this type are in scope)	Location(s) of Facility (city, country)
Example: Data centers	3	Boston, MA, USA



Microsoft Azure Data Center	4	Central US South Central US North Europe West Europe
AWS Payment Cryptography	1	US East



Part 2e. PCI SSC Validated Products and Solutions (ROC Section 3.3)

Does the entity use any item identified on any PCI SSC Lists of Validated Products and Solutions*?	
☐ Yes ⊠ No	

Provide the following information regarding each item the entity uses from PCI SSC's Lists of Validated Products and Solutions:

Name of PCI SSC validated Product or Solution	Version of Product or Solution	PCI SSC Standard to which Product or Solution Was Validated	PCI SSC Listing Reference Number	Expiry Date of Listing
Not Applicable.	Not Applicable.	Not Applicable.	Not Applicable.	Not Applicable.

^{*} For purposes of this document, "Lists of Validated Products and Solutions" means the lists of validated products, solutions, and/or components, appearing on the PCI SSC website (www.pcisecuritystandards.org) (for example, 3DS Software Development Kits, Approved PTS Devices, Validated Payment Software, Point to Point Encryption (P2PE) solutions, Software-Based PIN Entry on COTS (SPoC) solutions, Contactless Payments on COTS (CPoC) solutions), and Mobile Payments on COTS (MPoC) products.



Part 2f. Third-Party Service Providers (ROC Section 4.4)

that:	nuty have relationships with one of more time-part	y service providers		
· ·	Store, process, or transmit account data on the entity's behalf (for example, payment gateways, payment processors, payment service providers (PSPs, and off-site storage))			
network security control services, anti-ma	 Manage system components included in the entity's Assessment (for example, via network security control services, anti-malware services, security incident and event management (SIEM), contact and call centers, web-hosting companies, and IaaS, PaaS, SaaS, and FaaS cloud providers) 			
 Could impact the security of the entity's CDE (for example, vendors providing support via remote access, and/or bespoke software developers). 				
If Yes:				
Name of Service Provider: Description of Services Provided:				
Microsoft Azure	On-demand cloud computing platform that hosts application/services	the entity		
CloudFlare, Inc.	Web Application Firewall (WAF)			
Fastly, Inc. Web Application Firewall (WAF)				
Sumo Logic, Inc. Logging and Monitoring solution				
Note: Requirement 12.8 applies to all entities	s in this list.			



Part 2g. Summary of Assessment (ROC Section 1.8.1)

Indicate below all responses provided within each principal PCI DSS requirement.

For all requirements identified as either "Not Applicable" or "Not Tested," complete the "Justification for Approach" table below.

Note: One table to be completed for each service covered by this AOC. Additional copies of this section are available on the PCI SSC website.

Name of Service Assessed: Tokenization Service including Browser and Mobile Implementations, Token Services API, Batch File Transfer Capability, Encrypted devices (owned and operated by customer), Ecommerce Package, Mobile API, and Transparent Gateway.

PCI DSS Requirement	Requirement Finding More than one response may be selected for a given requirement. Indicate all responses that apply.				Select If a Compensating Control(s) Was
	In Place	Not Applicable	Not Tested	Not in Place	Used
Requirement 1:	\boxtimes	\boxtimes			
Requirement 2:	\boxtimes				
Requirement 3:	\boxtimes	\boxtimes			
Requirement 4:	\boxtimes	\boxtimes			
Requirement 5:	\boxtimes	\boxtimes			
Requirement 6:	\boxtimes	\boxtimes			
Requirement 7:	\boxtimes				
Requirement 8:	\boxtimes	\boxtimes			
Requirement 9:	\boxtimes	\boxtimes			
Requirement 10:	\boxtimes	\boxtimes			
Requirement 11:	\boxtimes	\boxtimes			
Requirement 12:	\boxtimes	\boxtimes			
Appendix A1:	\boxtimes				
Appendix A2:		\boxtimes			
Justification for Approach					



	porto are in ase.
	1.3.3, 2.3.1, 2.3.2, 4.2.1.2 - Wireless devices are not utilized within the CDE.
	3.3.3 - The entity is not an issuer and does not support issuing services.
	3.5.1.1 - No hashes of PAN present within the environment.
	3.5.1.2, 3.5.1.3 - Disk-level or partition-level encryption is not utilized within the environment.
	3.6.1.3, 3.7.6 - No cleartext cryptographic key components were utilized within the environment.
	3.7.2 - Cryptographic keys are not distributed outside the production confined environment.
	3.7.9 - Cryptographic keys are not shared with customers.
	4.2.2 - PAN is not transmitted over end-user messaging technologies.
	5.3.2.1 - Continous behavioral analysis of systems and processes is performed by anti-malware solution.
	5.3.3 - Removable electronic media ports are disabled on all endpoints.
	6.4.1 - This requirement is superseded by Requirement 6.4.2.
For any Not Applicable responses, identify which sub-	6.4.3, 11.6.1 - The entity does not manage or provide payment pages.
requirements were not applicable and the reason.	6.5.2, 11.3.1.3, 11.3.2.1, 12.5.3 - No significant change occurred during the assessment period.
	8.2.2 - Group, generic or other shared accounts were not present on any in-scope system component.
	8.2.3 - The entity does not access customer premises.
	8.3.9, 8.3.10.1 - All authentication into in-scope systems required MFA.
	8.3.10 - This requirement is superseded by Requirement 8.3.10.1.
	8.6.1, 8.6.2 - Interactive login was not permitted within the environment.
	9.4.1-9.4.7 - No media was utilized for transmitting, storing or processing cardholder data.
	9.5.1-9.5.1.3 - The entity does not utilize POS/POI terminals.
	10.4.2.1 - All audit logs are analyzed by an automated mechanism.
	10.7.1 - This requirement is superseded by Requirement 10.7.2.
	12.3.2 - No requirements have been met with the customized approach.
	A2 - The entity does not utilize POS/POI terminals.
	A3 - The entity is not required to perform additional requirements for Designated Entities Supplemental Validation (DESV).
For any Not Tested responses, identify which sub- requirements were not tested and the reason.	Not Applicable.

1.2.6, 2.2.5 - No insecure services, protocols, and

ports are in use.



Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3)

Date Assessment began: Note: This is the first date that evidence was gathered, or observations were made.	27 February 2025
Date Assessment ended: Note: This is the last date that evidence was gathered, or observations were made.	13 June 2025
Were any requirements in the ROC unable to be met due to a legal constraint?	☐ Yes ⊠ No
Were any testing activities performed remotely?	⊠ Yes □ No



Section 3 Validation and Attestation Details

Part 3. PCI DSS Validation (ROC Section 1.7)

This AOC is based on results noted in the ROC dated 13 June 2025. Indicate below whether a full or partial PCI DSS assessment was completed: ☑ Full Assessment - All requirements have been assessed and therefore no requirements were marked as Not Tested in the ROC. ☐ Partial Assessment - One or more requirements have not been assessed and were therefore marked as Not Tested in the ROC. Any requirement not assessed is noted as Not Tested in Part 2g above.							
Based on the results documented in the ROC noted above, each signatory identified in any of Parts 3b-3d, as applicable, assert(s) the following compliance status for the entity identified in Part 2 of this document (select one):							
	Compliant: All sections of the PCI DSS ROC are complete, and all assessed requirements are marked as being either In Place or Not Applicable, resulting in an overall COMPLIANT rating; thereby Ixopay, Inc. has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above.						
	Non-Compliant: Not all sections of the PCI DSS ROC are complete, or one or more requirements are marked as Not in Place, resulting in an overall NON-COMPLIANT rating; thereby (Service Provider Company Name) has not demonstrated compliance with PCI DSS requirements.						
	Target Date for Compliance:						
	An entity submitting this form with a Non-Compliant status may be required to complete the Action Plan in Part 4 of this document. Confirm with the entity to which this AOC will be submitted before completing Part 4.						
	as Not in Place due to a legal re assessed requirements are man COMPLIANT BUT WITH LEGA demonstrated compliance with a	ompliant but with Legal exception: One or more assessed requirements in the ROC are marked. Not in Place due to a legal restriction that prevents the requirement from being met and all other sessed requirements are marked as being either In Place or Not Applicable, resulting in an overall DMPLIANT BUT WITH LEGAL EXCEPTION rating; thereby (Service Provider Company Name) has emonstrated compliance with all PCI DSS requirements except those noted as Not Tested above or Not in Place due to a legal restriction.					
	This option requires additional re	eview from the entity to which this AOC will be submitted.					
	If selected, complete the following:						
	Affected Requirement	Details of how legal constraint prevents requirement from being met					



Part 3. PCI DSS Validation (continued) Part 3a. Service Provider Acknowledgement Signatory(s) confirms: (Select all that apply) The ROC was completed according to PCI DSS, Version 4.0.1 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 the Assessment in all material respects. \boxtimes PCI DSS controls will be maintained at all times, as applicable to the entity's environment. Part 3b. Service Provider Attestation Signature of Service Provider Executive Officer 1 Date: 13 June 2025 Service Provider Executive Officer Name: John Noltensmeyer Title: Chief Information Security Officer Part 3c. Qualified Security Assessor (QSA) Acknowledgement If a QSA was involved or assisted with this ☑ QSA performed testing procedures. Assessment, indicate the role performed: ☐ QSA provided other assistance. If selected, describe all role(s) performed: Not Applicable. Date: 13 June 2025 Signature of Lead QSA 1 Lead QSA Name: Pritam Bankar Signature of Duly Authorized Officer of QSA Company 1 Date: 13 June 2025 Duly Authorized Officer Name: Petar Besalev, EVP Cybersecurity QSA Company: A-LIGN and Compliance Services Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement If an ISA(s) was involved or assisted with this ☐ ISA(s) performed testing procedures. Assessment, indicate the role performed: ☐ ISA(s) provided other assistance. If selected, describe all role(s) performed:



Part 4. Action Plan for Non-Compliant Requirements

Only complete Part 4 upon request of the entity to which this AOC will be submitted, and only if the Assessment has Non-Compliant results noted in Section 3.

If asked to complete this section, select the appropriate response for "Compliant to PCI DSS Requirements" for each requirement below. For any "No" responses, include the date the entity expects to be compliant with the requirement and provide a brief description of the actions being taken to meet the requirement.

PCI DSS Requirement	Description of Requirement	Compliant to PCI DSS Requirements (Select One)		Remediation Date and Actions (If "NO" selected for any
		YES	NO	Requirement)
1	Install and maintain network security controls			
2	Apply secure configurations to all system components			
3	Protect stored account data			
4	Protect cardholder data with strong cryptography during transmission over open, public networks			
5	Protect all systems and networks from malicious software			
6	Develop and maintain secure systems and software			
7	Restrict access to system components and cardholder data by business need to know			
8	Identify users and authenticate access to system components			
9	Restrict physical access to cardholder data			
10	Log and monitor all access to system components and cardholder data			
11	Test security systems and networks regularly			
12	Support information security with organizational policies and programs			
Appendix A1	Additional PCI DSS Requirements for Multi- Tenant Service Providers			
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections			

Note: The PCI Security Standards Council is a global standards body that provides resources for payment security professionals developed collaboratively with our stakeholder community. Our materials are accepted in numerous compliance programs worldwide. Please check with your individual compliance accepting organization to ensure that this form is acceptable in their program. For more information about PCI SSC and our stakeholder community please visit: https://www.pcisecuritystandards.org/about_us/