Payment Card Industry (PCI)
Data Security Standard

Attestation of Compliance for
Onsite Assessments - Service Providers

Version 3.2.1

Using the PCI Security Standards Council Template dated **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:	TokenEx, Inc.	DBA (doing business as):	Not Applicable.
Contact Name:	Marc Phillips	Title:	GRC Director
Telephone:	+1 (877) 316-4544	E-mail:	mphillips@tokenex.com
Business Address:	5314 South Yale Avenue, Suite 800	City:	Tulsa
State/Province:	Oklahoma	Country: United States	Zip: 74135
URL:	www.tokenex.com		

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

Company Name:	A-LIGN Compliance and Security, Inc. dba A-LIGN		
Lead QSA Contact Name:	Daniel Powers	Title:	Senior Manager
Telephone:	+1 (888) 702-5446	E-mail:	daniel.powers@A-LIGN.com
Business Address:	400 N. Ashley Drive, Suite 1325	City:	Tampa
State/Province:	Florida	Country: United States	Zip: 33602
URL:	https://www.A-LIGN.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:	Tokenization Service including Browser and Mobile Implementations, Token Services API, Batch File Transfer Capability, P2PE Devices, 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
- ☒ Security services
- ☐ 3-D Secure Hosting Provider
- ☐ Shared Hosting Provider
- ☒ Other Hosting (specify):
Tokenization Service Provider

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):

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:**
☐ Applications / software ☐ Hardware ☐ Infrastructure / Network ☐ Physical space (co-location) ☐ Storage ☐ Web ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Shared Hosting Provider ☐ Other Hosting (specify):	☐ Systems security services ☐ IT support ☐ Physical security ☐ Terminal Management System ☐ Other services (specify):	☐ 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:	Not Applicable. All services provided by TokenEx are included in this assessment.

Part 2b. Description of Payment Card Business	
Describe how and in what capacity your business stores, processes, and/or transmits cardholder data.	TokenEx is a tokenization service provider for transactions transmitted via SSH-initiated API calls from P2PE devices and files transmitted via SFTP to provide scope reduction to its clients. TokenEx also provides a Java script iFrame allowing users to enter cardholder data which is directed to TokenEx for tokenization and authorization on behalf of the merchant.
Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data.	TokenEx provides tokenization of credit card PANs.

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):
TokenEx Corporate Office	1	Tulsa, OK
Microsoft Azure Data Centers	1	Redmond, WA

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)
Not Applicable.	Not Applicable.	Not Applicable.	☐ Yes ☐ 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._	The assessment for TokenEx service provider offerings included all cardholder data environments. All devices located within the TokenEx CDE in the Microsoft Azure Data Center were assessed. It was confirmed that no CHD was stored, processed, or transmitted outside of these environments through documentation, interviews, and process review. Additionally, diagrams and database information were shared for validation testing and compliance validation.
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:
Microsoft Azure	Provider of Infrastructure as a Service for the TokenEx Tokenization platform
Authorize.net	Payment Processor
Beanstream	Payment Processor
Chase NetConnect	Payment Processor
Chase Orbital	Payment Processor
CyberSource	Payment Processor
Elavon	Payment Processor
FirstData Compass	Payment Processor
FirstData E4	Payment Processor
Global Payments	Payment Processor
Litle	Payment Processor
LUCY	Payment Processor
Merchant e-Solutions	Payment Processor
Moneris	Payment Processor
Moneris US	Payment Processor
NMI	Payment Processor
Optimal Payments	Payment Processor
PayPal Payflow Pro	Payment Processor
QBMS	Payment Processor
Sage	Payment Processor
SecureNet	Payment Processor
SIX Payment Services	Payment Processor
Stripe	Payment Processor
TransFirst	Payment Processor

USA ePay	Payment Processor
WorldPay Corporate	Payment Processor
WorldPay US	Payment Processor
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:	Tokenization Service including Browser and Mobile Implementations, Token Services API, Batch File Transfer Capability, P2PE Devices, Ecommerce Package, Mobile API, and Transparent Gateway

PCI DSS Requirement	Details of Requirements Assessed			
	Full	**Partial**	**None**	**Justification for Approach** (Required for all "Partial" and "None" responses. Identify which sub-requirements were not tested and the reason.)
Requirement 1:	☒	☐	☐	
Requirement 2:	☐	☒	☐	2.1.1 - Not Applicable. No wireless environments connected to the CDE or that transmit CHD. 2.2.3 - Not Applicable. TokenEx does not use insecure ports, protocols, or services. 2.6 - Not Applicable. TokenEx is not a shared hosting provider.
Requirement 3:	☐	☒	☐	3.2.a - 3.2.b - Not Applicable. TokenEx is not an issuer. 3.4.1 - Not Applicable. TokenEx does not use Disk Encryption. 3.6 - Not Applicable. Assessor reviewed key management documentation and interviewed TokenEx staff which all stated that sharing keys with customers is prohibited.
Requirement 4:	☐	☒	☐	4.1.1 - Not Applicable. No wireless networks at TokenEx transmit CHD or are connected to the CDE.
Requirement 5:	☒	☐	☐	
Requirement 6:	☒	☐	☐	
Requirement 7:	☒	☐	☐	
Requirement 8:	☒	☐	☐	

Requirement 9:	☐	☒	☐	9.5 - 9.7.1 - Not Applicable. TokenEx forbids CHD from leaving the CDE in any form of removable media. TokenEx does not record CHD onto any hardcopy materials. 9.8.1 - 9.8.2 - Not Applicable. TokenEx forbids CHD from leaving the CDE in any form of removable media. TokenEx does not record CHD onto any hardcopy materials. 9.9, 9.9.1, 9.9.2, and 9.9.3 - Not Applicable. TokenEx does not use any physical device to capture CHD.
Requirement 10:	☒	☐	☐	
Requirement 11:	☐	☒	☐	11.2.3 - Not Applicable. No significant changes occurred within the past 12 months that would require additional scans. 11.3.3 - Not Applicable. No exploitable vulnerabilities found during penetration testing.
Requirement 12:	☒	☐	☐	
Appendix A1:	☐	☐	☒	Not Applicable. TokenEx is not a shared hosting provider.
Appendix A2:	☐	☐	☒	Not Applicable. TokenEx does not use SSL or early TLS to capture card data.

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:	20 July 2023
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

Section 3: Validation and Attestation Details

Part 3. PCI DSS Validation

This AOC is based on results noted in the ROC dated 20 July 2023.

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):**

☒ **Compliant:** All sections of the PCI DSS ROC are complete, all questions answered affirmatively, resulting in an overall **COMPLIANT** rating; thereby **TokenEx. Inc.** has demonstrated full compliance with the PCI DSS.

☐ **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 *(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

Signatory(s) confirms:

(Check all that apply)

☒ The ROC was completed according to the *PCI DSS Requirements and Security Assessment Procedures*, Version *3.2.1*, and was completed according to the instructions therein.

☒ 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.

☒ 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 (continued)

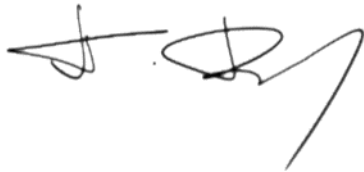|	
☒	No evidence of full track data[1], CAV2, CVC2, CID, or CVV2 data[2], or PIN data[3] storage after transaction authorization was found on ANY system reviewed during this assessment.
☒	ASV scans are being completed by the PCI SSC Approved Scanning Vendor Qualys, certificate number 3728-01-17.

Part 3b. Service Provider Attestation

Signature: Jillian Sheehan

Signature of Service Provider Executive Officer ↑	*Date:* 21 July 2023
Service Provider Executive Officer Name: Jillian Sheehan	*Title:* 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 assessor provided PCI DSS advisory and assessment services, which included observation of controls, interviews with key personnel, and review of policies and procedures.

Signature

Signature of Duly Authorized Officer of QSA Company ↑	*Date:* 21 July 2023
Duly Authorized Officer Name: Petar Besalev, EVP Cybersecurity and Compliance Services	*QSA Company:* A-LIGN

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	☒	☐	
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 malware and regularly update anti-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	☒	☐	
9	Restrict physical access to cardholder data	☒	☐	
10	Track and monitor all access to network resources and cardholder data	☒	☐	
11	Regularly test security systems and processes	☒	☐	
12	Maintain a policy that addresses information security for all personnel	☒	☐	
Appendix A1	Additional PCI DSS Requirements for Shared Hosting Providers	☐	☐	Not Applicable.
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections	☐	☐	Not Applicable.