



Payment Card Industry (PCI) Data Security Standard

Attestation of Compliance for Onsite Assessments - Service Providers

Version 3.2

April 2016

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:	BridgePay Network Solutions, LLC		DBA (doing business as):	T-Gate Payments	
Contact Name:	William Marshall		Title:	CTO	
Telephone:	407-960-6464		E-mail:	William.marshall@bridgepaynetwork.com	
Business Address:	600 North Lake Blvd, Suite 210		City:	Altamonte Springs	
State/Province:	FL	Country:	USA	Zip:	32701
URL:	www.bridgepaynetwork.com				
Part 1b. Qualified Security Assessor Company Information (if applicable)					
Company Name:	A-LIGN				
Lead QSA Contact Name:	Patrick Sullivan		Title:	Senior Consultant	
Telephone:	1-888-702-5446 x340		E-mail:	Patrick.sullivan@a-lign.com	
Business Address:	400 N. Ashley Drive, Suite 1325		City:	Tampa	
State/Province:	Florida	Country:	USA	Zip:	33602
URL:	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: BridgePay Payment 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):

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:

- 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):

- | | | |
|--|---|--|
| <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.	BridgePay stores encrypted CHD for customer payments and recurring payments within their Legacy T-Gate SQL databases. The BridgePay Gateway stores CHD in its tokenization appliances.
Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data.	BridgePay fully manages and administers the CDE and controls protecting the cardholder data.

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	<i>Boston, MA, USA</i>
Corporate Headquarters	1	Altamonte Springs, FL, USA
Datacenter	2	Orlando, FL, USA Charlotte, NC, 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)
PayLink	2.1.251	BridgePay	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	October 28, 2022
WebLink2.0	2.0	BridgePay	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not Applicable.
SecureLink	1.0	BridgePay	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Not Applicable.
PathwayLINK	2.08	BridgePay	<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.*

BridgePay Network Solutions provides credit card transaction gateway services to its customers. BridgePay operates two payment gateways, both of which were included in the scope of the assessment.

BridgePay offers gateway switch services, application payment, EMV and tokenization solutions which allow customers to process payments while minimizing customer handling of cardholder data. Gateway integration is provided through web services via the BridgeComm and PathwayLINK APIs. The APIs serve as card entry points that can be easily integrated with the customer's payment solution. BridgePay also accepts card data through card swipes or CHD keyed into a terminal via the PayGuardian and legacy T-Gate PayLINK applications. Card data can also be manually entered via a virtual terminal web site hosted by BridgePay. Card data is sent via TLS encrypted connections to the BridgePay or Legacy T-Gate hosted environment. A token is returned to the application and passed to the customers' applications for storage. No cardholder data is ever sent to the customers' database or application. Ecommerce transactions are supported through a BridgePay developed payment page named WebLINK. BridgePay customers utilize the WebLINK payment page to reduce the PCI scope of their ecommerce solutions.

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

<p>Does your company have a relationship with a Qualified Integrator & Reseller (QIR) for the purpose of the services being validated?</p> <p>If Yes:</p> <p> Name of QIR Company:</p> <p> QIR Individual Name:</p> <p> Description of services provided by QIR:</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
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<p>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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
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If Yes:

Name of service provider:	Description of services provided:
AlertLogic	Security monitoring, logging, and incident response
Atlantic.NET	Data center Co-Location services
Iron Mountain	Data back-up (tape) storage
Peak10	Data center Co-Location services
Soaring Eagle	DBA Support
Thought Focus	Development Support

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:		BridgePay 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 - BridgePay does not have routers within the CDE 1.2.3 - BridgePay does not use wireless in the CDE
Requirement 2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2.1.1 - BridgePay does not have wireless in the CDE 2.6 - BridgePay is not a shared hosting service provider
Requirement 3:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3.4.1 - BridgePay does not use disk encryption 3.6.6 - BridgePay does not use manual clear-text cryptographic key-management operations
Requirement 4:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4.1.1 - BridgePay does not use wireless in the CDE 4.2 - End-user messaging technologies are not used to send PAN
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 - No significant changes were made in the past 12 months
Requirement 7:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 8:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 9:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	9.9 - BridgePay does not utilize POS/POI terminals

Requirement 10:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 11:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	11.1.1 - BridgePay does not use wireless in the CDE 11.2.3 - No significant changes were made in the past 12 months 11.3.3 - No repeat testing was necessary
Requirement 12:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Appendix A1:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	A1 - BridgePay is not a shared hosting service provider
Appendix A2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	A2 - T-Gate utilizes early versions of TLS

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>April 14, 2018</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 *April 14, 2018*.

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>BridgePay (T-Gate)</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>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, 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)

- No evidence of full track data¹, CAV2, CVC2, CID, or CVV2 data², or PIN data³ 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 *AlertLogic*.

Part 3b. Service Provider Attestation

William J Marshall

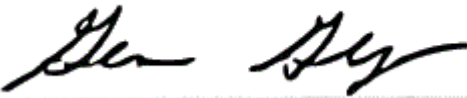
Digitally signed by William J Marshall
DN: cn=William J Marshall, o=BridgePay Network Solutions, LLC, ou,
email=bill.marshall@bridgepaynetwork.com, c=US
Date: 2018.04.16 13:12:14 -0400

<i>Signature of Service Provider Executive Officer</i> ↑	<i>Date:</i> April 16, 2018
<i>Service Provider Executive Officer Name:</i> William Marshall	<i>Title:</i> CTO

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 onsite observation of controls, interviews with key personnel, and review of policies and procedures.



<i>Signature of Duly Authorized Officer of QSA Company</i> ↑	<i>Date:</i> April 16, 2018
<i>Duly Authorized Officer Name:</i> Gene Geiger, President	<i>QSA Company:</i> 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.

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 type="checkbox"/>	<input type="checkbox"/>	Not Applicable.
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

