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:	ACD Direct		DBA (doing business as):	Not Applicable.	
Contact Name:	William Davis		Title:	Director of Technical Operations	
Telephone:	+1 (888) 320-0033		E-mail:	william.davis@acddirect.com	
Business Address:	240 NE Promontory, Suite 200		City:	Farmington	
State/Province:	Utah	Country:	United States	Zip:	84025
URL:	https://www.acddirect.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:	Taylor Cascio		Title:	Senior Consultant	
Telephone:	+1 (888) 702-5446		E-mail:	taylor.cascio@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				

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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:	PledgeCart, CallsWithoutWalls, SimpleScript	
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.*

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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:	eCallogy	
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): Government-specialized contact center		
Provide a brief explanation why any checked services were not included in the assessment:	The assessment focused on PledgeCart, CallsWithoutWalls, SimpleScript, and their associated system components and business processes. Other business offerings were determined to be separate from those assessed, and not included in assessment scope.	

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Part 2b. Description of Payment Card Business	
Describe how and in what capacity your business stores, processes, and/or transmits cardholder data.	ACD Direct is a Level 1 Service Provider that provides fundraising services to assist non-profit organizations in their fundraising efforts. ACD Direct currently collects and transmits credit card information on behalf of their customers. Customers of ACD Direct can have donors donate funds using ACD Direct's PledgeCart web application, or they can call an ACD Direct line and have one of ACD Direct's agents, represented as ACD Connect, take the donation information over the phone. ACD Connect agents use ACD Direct's SimpleScript web application, which resolves to https://www.callswithoutwalls.com, in combination with the third-party InContact platform to enter donor CHD for authorization and processing. Alternatively, to collect donor information and cardholder data, ACD Connect agents can send a one-time use SMS or e-mail link via the InContact platform, which brings the caller to a https://www.callswithoutwalls.com form to enter their CHD. The ACD Connect agent will not see CHD details if the customer opts for this payment method, however, the agent will be notified once the payment is complete so they may continue their call. Non-profit organizations select payment processors from one ACD Direct's supported integrations. Donor cardholder data captured via PledgeCart or SimpleScript is forwarded to payment processors via strong cryptography for authorization. In the event a payment processor is down, the cardholder may be stored in an encrypted database for a short period of time, with automated scripts automatically purging any data over that age. ACD Direct also maintains an Azure storage account for database redundancy, which is automatically encrypted using strong cryptography. ACD Connect calls are recorded for quality assurance purposes, however, once agents navigate to the pages where they take the cardholder data the recording is automatically toned out by InContact, only to be automatically resumed after validating payment details and moving to the next page. Call recordings are maintained within the InContact platform.
Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data.	Donor cardholder data captured via PledgeCart or SimpleScript is forwarded to payment processors via strong cryptography for authorization. In the event a payment processor is down, the cardholder data may be stored in an encrypted database for a short period of time, with automated scripts automatically purging any data over that age. ACD Direct also maintains an Azure storage account for database redundancy, which is automatically encrypted.

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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 (Flexential)	1	Salt Lake City, UT, USA
Azure Region	1	West Central US - WY, USA
Headquarters	1	Salt Lake City, UT, 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)
PledgeCart	3.0	ACD Direct	☐ Yes ☒ No	Not Applicable.
SimpleScript	20230908-1	ACD Direct	☐ 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 assessed environment consisted of multiple networks hosted within PCI compliant colocations and cloud service providers. Each network contained connections into and out of the CDE to support payment gateway connections. Critical system components within the CDE include firewalls, IPS, VPNs, internal network segments, WAFs, hypervisors, production servers, databases, encryption mechanisms, and workstations with access to the cardholder data environment. ACD Direct offices were not utilized to house CDE system components or perform CHD-impacting operations.
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

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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:**
Flexential	Colocation
Microsoft Azure	Cloud Service Provider
InContact	Call Center Platform
WorldPay (FIS)	Payment Processing
Paya	Payment Processing
Authorize.Net	Payment Processing
Blackbaud	Payment Processing
iATS	Payment Processing
PayPal	Payment Processing
PSI	Payment Processing
BiS	Payment Processing
ACI	Payment Processing
Bluefin	Payment Processing
Elavon	Payment Processing
Stripe	Payment Processing
Windcave	Payment Processing
Cybersource	Payment Processing
QGiv	Payment Processing
Safe Save	Payment Processing
Note: *Requirement 12.8 applies to all entities in this list.*	

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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:	PledgeCart, CallsWithoutWalls, SimpleScript

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. ACD Direct does not utilize wireless networks within their CDE. 2.2.3 - Not Applicable. ACD Direct does not provision insecure services, daemons, or protocols. 2.6 - Not Applicable. ACD Direct is not a shared hosting provider.
Requirement 3:	☐	☒	☐	3.4.1 - Not Applicable. ACD Direct does not utilize disk encryption when storing cardholder data. 3.6 - Not Applicable. ACD Direct does not share keys with their customers. 3.6.6 - Not Applicable. ACD Direct does not utilize manual, clear-text cryptography practices.
Requirement 4:	☒	☐	☐	
Requirement 5:	☐	☒	☐	5.1.2 - Not Applicable. ACD Direct does not classify any CDE system components as uncommonly affected by malware.
Requirement 6:	☐	☒	☐	6.4.6 - Not Applicable. ACD Direct did not have any significant changes over the review period.
Requirement 7:	☒	☐	☐	

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Requirement 8:	☐	☒	☐	8.1.5 - Not Applicable. ACD Direct does not provision third-parties with access to the CDE. 8.5.1 - Not Applicable. ACD Direct does not maintain connections to customer premises.
Requirement 9:	☐	☒	☐	9.1.2 - Not Applicable. ACD Direct operates within PCI-compliant colocations and cloud service providers which do not provision publicly accessible network jacks. 9.5 - 9.8.2 - Not Applicable. ACD Direct does not handle or store cardholder data to any physical media. 9.9 - 9.9.3 - Not Applicable. ACD Direct does not utilize or maintain POS/POI terminals.
Requirement 10:	☒	☐	☐	
Requirement 11:	☐	☒	☐	11.2.3 - Not Applicable. ACD Direct did not have any significant changes over the review period.
Requirement 12:	☒	☐	☐	
Appendix A1:	☐	☐	☒	ACD Direct is not a shared hosting provider.
Appendix A2:	☐	☐	☒	ACD Direct does not utilize SSL/early TLS or POS/POI terminals.

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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:	05 November 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

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Section 3: Validation and Attestation Details

Part 3. PCI DSS Validation

This AOC is based on results noted in the ROC dated 05 November 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 **ACD Direct** 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.

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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 - 3728-01-18).

Part 3b. Service Provider Attestation



Signature of Service Provider Executive Officer ↑	*Date:* 06 November 2023
Service Provider Executive Officer Name: William Davis	*Title:* Director of Technical Operations

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 of Duly Authorized Officer of QSA Company ↑	*Date:* 06 November 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.

[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.

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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	☒	☐	
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.











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