



# **Payment Card Industry (PCI) Data Security Standard**

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## **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:	Liquid Web, Inc.		DBA (doing business as):	Liquid Web, Inc.		
Contact Name:	Nick Campbell		Title:	Senior Director of Security & Architecture		
Telephone:	(678) 471-6532		E-mail:	ncampbell@liquidweb.com		
Business Address:	2703 Ena Dr.		City:	Lansing		
State/Province:	MI	Country:	USA		Zip:	48917
URL:	www.liquidweb.com					

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

Company Name:	UHY Consulting, Inc.				
Lead QSA Contact Name:	Jamison See	Title:	Senior Manager		
Telephone:	(248) 204-9477	E-mail:	jsee@gmail.com		
Business Address:	980 Hammond Dr, Suite 100	City:	Atlanta		
State/Province:	GA	Country:	USA	Zip:	30328
URL:	www.uhy-us.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: Data Center Physical Security

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: Managed Service Provider

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:

This ROC focused on the physical security services the company provides to customers.

## Part 2b. Description of Payment Card Business

Describe how and in what capacity your business stores, processes, and/or transmits cardholder data.

The company does not store, process, or transmit cardholder data at their data centers on behalf of their customers. While customers may store, process, or transmit cardholder data through the company's hosted systems for clients, additional services under the company's service offerings are not considered for this ROC.

Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data.

IT staff and security personnel provide support services to physically secure the servers that could house customer cardholder data environments.

## 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>
Data Centers	2	Lansing, MI, 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)
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	

## 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 company's data centers provider physical security controls for potential customer cardholder data environments.

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:

QIR Individual Name:

Description of services provided by QIR:

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:

**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:		Data Center Physical Security		
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:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Tested. The scope of the ROC included only the Data Center Physical Security service offering which limited the scope of the assessment to Requirements 9 & 12.
Requirement 2:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Tested. The scope of the ROC included only the Data Center Physical Security service offering which limited the scope of the assessment to Requirements 9 & 12.
Requirement 3:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Tested. The scope of the ROC included only the Data Center Physical Security service offering which limited the scope of the assessment to Requirements 9 & 12.
Requirement 4:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Tested. The scope of the ROC included only the Data Center Physical Security service offering which limited the scope of the assessment to Requirements 9 & 12.
Requirement 5:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Tested. The scope of the ROC included only the Data Center Physical Security service offering which limited the scope of the assessment to Requirements 9 & 12.
Requirement 6:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Tested. The scope of the ROC included only the Data Center Physical Security service offering which

				limited the scope of the assessment to Requirements 9 & 12.
Requirement 7:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Tested. The scope of the ROC included only the Data Center Physical Security service offering which limited the scope of the assessment to Requirements 9 & 12
Requirement 8:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Tested. The scope of the ROC included only the Data Center Physical Security service offering which limited the scope of the assessment to Requirements 9 & 12.
Requirement 9:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	9.5 - 9.8 Not Applicable - No media is part of the cardholder environment.  9.9, 9.9.1; 9.9.2; 9.9.3; Not applicable - No devices that capture payment card data via direct physical interaction are part of the cardholder environment.
Requirement 10:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Tested. The scope of the ROC included only the Data Center Physical Security service offering which limited the scope of the assessment to Requirements 9 & 12.
Requirement 11:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Tested. The scope of the ROC included only the Data Center Physical Security service offering which limited the scope of the assessment to Requirements 9 & 12..
Requirement 12:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	12.3.8 & 12.3.9 - The scope of the ROC is limited to physical security. Remote access to card holder data is not available.  12.3.10 - The scope of the ROC is limited to physical security. The company does not have access to customer cardholder data.  12.8.1; 12.8.2; 12.8.3; 12.8.4; 12.8.5 No other service providers are utilized in the customer data hosting environment.  12.11 The scope of this assessment was limited to Requirements 9 & 12 and as a result the specified quarterly review components are for requirements that are not in scope for this assessment.
Appendix A1:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Tested. The scope of the ROC included only the Data Center Physical Security service offering which limited the scope of the assessment to Requirements 9 & 12.
Appendix A2:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Tested. The scope of the ROC included only the Data Center Physical Security service offering which



				limited the scope of the assessment to Requirements 9 & 12.
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## Section 2: Report on Compliance

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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:	5/25/2023
Have compensating controls been used to meet any requirement in the ROC?	<input type="checkbox"/> Yes <input 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 checked="" type="checkbox"/> Yes <input 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 5/25/2023.

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**):

<input checked="" type="checkbox"/>	<p><b>Compliant:</b> All sections of the PCI DSS ROC are complete, all questions answered affirmatively, resulting in an overall <b>COMPLIANT</b> rating; thereby Liquid Web, Inc. has demonstrated full compliance with the PCI DSS.</p>						
<input type="checkbox"/>	<p><b>Non-Compliant:</b> Not all sections of the PCI DSS ROC are complete, or not all questions are answered affirmatively, resulting in an overall <b>NON-COMPLIANT</b> rating, thereby (<i>Service Provider Company Name</i>) has not demonstrated full compliance with the PCI DSS.</p> <p><b>Target Date</b> 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><b>Compliant but with Legal exception:</b> 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"> <thead> <tr> <th>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 3.2.1, 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 type="checkbox"/> | No evidence of full track data <sup>1</sup> , CAV2, CVC2, CID, or CVV2 data <sup>2</sup> , or PIN data <sup>3</sup> storage after transaction authorization was found on ANY system reviewed during this assessment. |
| <input type="checkbox"/> | ASV scans are being completed by the PCI SSC Approved Scanning Vendor ( <i>ASV Name</i> )  |

### Part 3b. Service Provider Attestation

*Nick Campbell*

Signature of Service Provider Executive Officer ↑	Date: 5/25/2023
Service Provider Executive Officer Name: Nick Campbell	Title: Senior Director of Security & Architecture

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

If a QSA was involved or assisted with this assessment, describe the role performed:

The QSA confirmed the scope of the engagement, conducted interviews with compliance and technical personnel, conducted testing, reviewed evidence, and drafted the ROC.

*Jamison See*

Signature of Duly Authorized Officer of QSA Company ↑	Date: 5/25/2023
Duly Authorized Officer Name: Jamison See	QSA Company: UHY Consulting, Inc.

### 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:

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<sup>1</sup> 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.

<sup>2</sup> 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.

<sup>3</sup> 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 type="checkbox"/>	<input type="checkbox"/>	Not Tested
2	Do not use vendor-supplied defaults for system passwords and other security parameters	<input type="checkbox"/>	<input type="checkbox"/>	Not Tested
3	Protect stored cardholder data	<input type="checkbox"/>	<input type="checkbox"/>	Not Tested
4	Encrypt transmission of cardholder data across open, public networks	<input type="checkbox"/>	<input type="checkbox"/>	Not Tested
5	Protect all systems against malware and regularly update anti-virus software or programs	<input type="checkbox"/>	<input type="checkbox"/>	Not Tested
6	Develop and maintain secure systems and applications	<input type="checkbox"/>	<input type="checkbox"/>	Not Tested
7	Restrict access to cardholder data by business need to know	<input type="checkbox"/>	<input type="checkbox"/>	Not Tested
8	Identify and authenticate access to system components	<input type="checkbox"/>	<input type="checkbox"/>	Not Tested
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 type="checkbox"/>	<input type="checkbox"/>	Not Tested
11	Regularly test security systems and processes	<input type="checkbox"/>	<input type="checkbox"/>	Not Tested
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 Tested
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections	<input type="checkbox"/>	<input type="checkbox"/>	Not Tested

