

Payment Card Industry Data Security Standard

Attestation of Compliance for Report on Compliance – Service Providers

Version 4.0

Revision 2

Publication Date: August 2023



PCI DSS v4.0 Attestation of Compliance for Report on Compliance – Service Providers

Entity Name: Systems East, Inc.

Assessment End Date: April 24th, 2024

Date of Report as noted in the Report on Compliance: April 29th, 2024



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:	Systems East, Inc
DBA (doing business as):	
Company mailing address:	50 Clinton Avenue Cortland, NY 13045
Company main website:	https://www.systemseast.com
Company contact name:	Peter Rogati
Company contact title:	Director of Operations
Contact phone number:	+1 (607)753-6156
Contact e-mail address:	peter@systemseast.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):	N/A	
Qualified Security Assessor		
Company name:	Securisea	
Company mailing address:	2501 Chatham Rd Suite 4573 Springfield, IL 62704	
Company website:	https://www.securisea.com/	
Lead Assessor name:	Thomas Porter	
Assessor phone number:	+1 (877) 563-4230 x410	



Assessor e-mail address:	tporter@securisea.com		
Assessor certificate number:	206-677		
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:	Xpress-pay.com		
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):	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			
☐ 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 2a. Scope Verification (continued)				
Services that are provided by the service provider but were <u>NOT INCLUDED</u> in the scope of the Assessment (select all that apply):				
Name of service(s) not assessed:	Electronic paymer	nt services as sele	cted below.	
Type of service(s) not 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):	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 Cha	rgeback	☐ Payment Gateway/Switch	
☐ Back-Office Services	☐ Issuer Process	ing	☐ Prepaid Services	
⊠ Billing Management	☐ Loyalty Prograr	ns	☐ Records Management	
☐ Clearing and Settlement			☐ Tax/Government Payments	
☐ Network Provider				
Others (specify):				
Provide a brief explanation why any owere not included in the Assessment		The above checked services do not involve any transmission, processing, or storage of CHD.		
Part 2b. Description of Role with Payment Cards (ROC Section 2.1)				
Describe how the business stores, processes, and/or transmits account data.		Systems East stores, processes, and transmits cardholder data (CHD) entirely within its outsourced cloud environment hosted by Flexential. Systems East's web and application servers running its ecommerce application Xpress-pay.com receive transactions (including CHD) via a TLS-encrypted browser connections and encrypts and stores the CHD within a SQL Server database for subscription or reoccuring payments. Systems East transmits CHD for authorization to payment processors or acquirers via the processors' PCI-compliant payment APIs.		



Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.	Systems East does not directly or otherwise impact the security of its clients' CDEs other than sharing of CHD which is covered in the scope of the assessment.
Describe system components that could impact the security of account data.	The relavent system components are limited to the inscope payment applications and databases within the Flexential-supported infrastructure.



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.

Systems East CDE includes its dedicated PCI operational systems held within the Flexential-supported infrastructure, which houses all in scope servers, software and storage, and also Fexentail's dedicated Azure identity management that houses all user identity and access permissions information.

Indicate whether the environment includes segmentation to reduce the scope of the	☐ No
Assessment.	
(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
Corporate Office	1	Cortland, NY
Flexential Data Center	1	Allentown, PA
Systems East Corporate Office	1	Cortland, NY





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
				YYYY-MM-DD

^{*} 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, Payment Applications (PA-DSS), Point to Point Encryption (P2PE) solutions, Software-Based PIN Entry on COTS (SPoC) solutions, and Contactless Payments on COTS (CPoC) solutions.



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

(ROC Section 4.4)				
For the services being validated, does the entity have relationships with one or more third-party service providers that:				
	• 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))			
 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 C remote access, and/or bespoke software	DE (for example, vendors providing support via developers).	⊠ Yes □ No		
If Yes:				
Name of Service Provider:	Description of Services Provided:			
Flexential, LLC	laaS			
Authorize.net	Payment processor			
Converge (Elavon)	Payment processor			
TSYS	Payment processor			
USAePay	Payment processor			
WorldPay	Payment processor			
Forte Payment Systems	Payment processor			

Note: Requirement 12.8 applies to all entities 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:

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



For any Not Applicable responses, identify which subrequirements were not applicable and the reason.

- 1.2.6 Systems East does not employ any insecure services, protocols, or services.
- 1.3.3 N/A No wireless networks are in scope or connected to the CDE
- 2.3.1 N/A Observed that the entire CDE exists within Flexential's infrastructure who's AOC states no connected wireless environments exist.
- 2.3.2 N/A Observed that the entire CDE exists within Flexential's infrastructure and thus no connected wireless environments exist.
- 3.3.1.1 N/A QSA reviewed proprietary AI systems& proprietary chat systems and confirmed SystemsEast does not receive any Track Data.
- 3.3.1.2 N/A QSA reviewed proprietary AI systems & proprietary chat systems and confirmed Systems East does not receive any CVC data.
- 3.3.1.3 N/A QSA reviewed proprietary AI systems & proprietary chat systems and confirmed Systems East does not receive any PIN Data.
- 3.3.2 N/A QSA reviewed proprietary AI systems & proprietary chat systems and confirmed Systems East does not receive any SAD data.
- 3.3.3 N/A Systems East is not an issuer and does not support issuing operations.
- 3.4.2 N/A Best Practice until March 31, 2025.
- 3.5.1.1 N/A Best Practice until March 31, 2025.
- 3.6.1.1 N/A Best Practice until March 31, 2025.
- 3.6.1.3 N/A Systems East does use cleartext cryptographic keys
- 3.7.6 N/A Systems East does use cleartext cryptographic key
- 3.7.9 N/A Systems East does not share keys
- 4.2.1.1 N/A Best Practice until March 31, 2025
- 4.2.1.2 N/A -- Observed that the entire CDE exists within Flexential's infrastructureand thus no connected wireless environments exist
- 4.2.2 N/A PAN is never sent over end user technologies
- 5.2.3 N/A Although they have systems that are not commonly affected, they have AV installed
- 5.2.3.1 N/A Best Practice until March 31, 2025.
- 5.3.1 N/A Best Practice until March 31, 2025.
- 5.3.2.1 N/A Best Practice until March 31, 2025.
- 5.3.3 N/A Best Practice until March 31, 2025.
- 5.4.1 N/A Best Practice until March 31, 2025.
- 6.3.2 N/A Best Practice until March 31, 2025.
- 6.4.2 N/A Best Practice until March 31, 2025.
- 6.4.3 N/A Best Practice until March 31, 2025.
- 7.2.4 N/A Best Practice until March 31, 2025.
- 7.2.5 N/A Best Practice until March 31, 2025.
- 7.2.5.1 N/A Best Practice until March 31, 2025.



8.2.3 - N/A - No remote access into customers systems.
8.2.7 - N/A – Systems East does not allow any 3rd party access to its CDE.
8.3.6 - N/A - Best Practice until March 31, 2025
8.3.10 - N/A - Best Practice until March 31, 2025
8.3.10.1 - N/A - Best Practice until March 31, 2025
8.4.2 - N/A - Best Practice until March 31, 2025
8.5.1 - N/A - Best Practice until March 31, 2025
8.6.1 - N/A - Best Practice until March 31, 2025
8.6.2 - N/A - Best Practice until March 31, 2025
8.6.3 - N/A - Best Practice until March 31, 2025
9.5.1 - N/A - Systems East does not use POI devices
9.5.1.1 - N/A - Systems East does not use POI device
9.5.1.2 - N/A - Systems East does not use POI devices
9.5.1.2.1 - N/A - Systems East does not use POI devices
9.5.1.3 - N/A - Systems East does not use POI devices
10.4.1.1 - N/A - Best Practice until March 31, 2025
10.4.2.1 - N/A - Best Practice until March 31, 2025
10.7.2 - N/A - Best Practice until March 31, 2025
11.3.1.1 - N/A - Best Practice until March 31, 2025
11.3.1.2 - N/A - Best Practice until March 31, 2025
11.3.1.3 - N/A - There was no significant changes in the last 12 months
11.3.2.1 - N/A - There was no significant changes in the last 12 months
11.4.7 - N/A - Best Practice until March 31, 2025
11.5.1.1 - N/A - Best Practice until March 31, 2025
11.6.1 - N/A - Best Practice until March 31, 2025
12.3.1 - N/A - Best Practice until March 31, 2025
12.3.3 - N/A - Best Practice until March 31, 2025
12.3.4 - N/A - Best Practice until March 31, 2025
12.5.2.1 - N/A - Best Practice until March 31, 2025
12.5.3 - N/A - Best Practice until March 31, 2025
12.6.2 - N/A - Best Practice until March 31, 2025 12.6.3.1 - N/A - Best Practice until March 31, 2025
12.6.3.2 - N/A - Best Practice until March 31, 2025
12.10.4.1 - N/A - Best Practice until March 31, 2025
12.10.7 - N/A - Best Practice until March 31, 2025
A1 - Systems East is not a multi-tenant service
provider.
A2 - Systems East does not use any early SSL/TLS
N/A

For any Not Tested responses, identify which subrequirements were not tested and the reason.



Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3.2)

Date Assessment began:	2024-03-26		
Note: This is the first date that evidence was g			
Date Assessment ended:	2024-04-23		
Note: This is the last date that evidence was g			
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
If yes, for each testing activity below, indicate whether remote assessment activities were performed:			
Examine documentation	⊠ Yes	□No	
Interview personnel	⊠ Yes	□No	
Examine/observe live data		□No	
Observe process being performed	⊠ Yes	☐ No	
Observe physical environment	⊠ Yes	□ No	
Interactive testing	⊠ Yes	□ No	
Other:	☐ Yes	□No	



Section 3 Validation and Attestation Details

Part 3. PCI DSS Validation (ROC Section 1.7)

ate below whether a full or partial ull Assessment – All requirement Not Tested in the ROC. artial Assessment – One or more Not Tested in the ROC. Any requirement	In the ROC dated (Date of Report as noted in the ROC 2024-04-29). PCI DSS assessment was completed: Its have been assessed and therefore no requirements were marked The requirements have not been assessed and were therefore marked uirement not assessed is noted as Not Tested in Part 2g above. 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 Systems East, 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: YYYY-MM-DD					
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.					
Compliant but with Legal exception: One or more assessed requirements in the ROC are marked as Not in Place due to a legal restriction that prevents the requirement from being met and all other assessed requirements are marked as being either In Place or Not Applicable, resulting in an overall COMPLIANT BUT WITH LEGAL EXCEPTION rating; thereby (Service Provider Company Name) has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above or as Not in Place due to a legal restriction.					
This option requires additional review 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				
	ate below whether a full or partial all Assessment — All requirements Not Tested in the ROC. artial Assessment — One or more and on the results documented in the oplicable, assert(s) the following of ct one): Compliant: All sections of the Finarked as being either In Place Systems East, Inc has demonstrated as Not in Place, resultin Company Name) has not demo Target Date for Compliance: You An entity submitting this form with Plan in Part 4 of this document. completing Part 4. Compliant but with Legal excaps Not in Place due to a legal reassessed requirements are man COMPLIANT BUT WITH LEGATE demonstrated compliance with a as Not in Place due to a legal reassessed requires additional reference in the requires additional reference in the ROC.				



Part 3. PCI DSS Validation (continued)					
Part	3a. Service Provider Acknowledger	nent			
Signatory(s) confirms: (Select all that apply)					
	The ROC was completed according to <i>PCI DSS</i> , Version 4.0 and was completed according to the instructions therein.				
	All information within the above-referenced ROC and in this attestation fairly represents the results of the Assessment in all material respects.				
	PCI DSS controls will be maintained at a	ll times, as applicable	to the entity's environment.		
Part	3b. Service Provider Attestation				
Peter J Rogati U					
Signa	1B814C56C4C0 ature of Service Provider Executive Officer	1	Date: 4/29/2024		
Servi	ce Provider Executive Officer Name: Pete	r T Rogati II	Title: Director of Operations		
Part :	3c. Qualified Security Assessor (QSA) A	Acknowledgement			
Assessment, indicate the role performed:		☑ QSA performed testing procedures.			
		· ·	QSA provided other assistance. selected, describe all role(s) performed:		
·	Signed by:				
Thomas Portur 131B97ABAB9B481 Signature of Lead QSA 1		Date: 2024-04-29			
	QSA Name: Thomas Porter		Date. 2021-01-23		
Josh Daymont CF838494882345C					
Signa	Signature of Duly Authorized Officer of QSA Company ↑		Date: 4/29/2024		
Duly Authorized Officer Name: Josh Daymont		QSA Company: Securisea, Inc.			
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:			
		1			



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	\boxtimes		
2	Apply secure configurations to all system components			
3	Protect stored account data	\boxtimes		
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	\boxtimes		
8	Identify users and authenticate access to system components			
9	Restrict physical access to cardholder data	\boxtimes		
10	Log and monitor all access to system components and cardholder data	\boxtimes		
11	Test security systems and networks regularly	\boxtimes		
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			











