

Payment Card Industry Data Security Standard

Attestation of Compliance for Self-Assessment Questionnaire D for Service Providers

For use with PCI DSS Version 4.0.1

Publication Date: October 2024



Section 1: Assessment Information

Instructions for Submission

This document must be completed as a declaration of the results of the entity's self-assessment against the *Payment Card Industry Data Security Standard (PCI DSS) Requirements and Testing Procedures.* Complete all sections: The entity is responsible for ensuring that each section is completed by the relevant parties, as applicable. Contact the entity(ies) to which the Attestation of Compliance (AOC) will be submitted for reporting and submission procedures.

This AOC reflects the results documented in an associated Self-Assessment Questionnaire (SAQ).

Capitalized terms used but not otherwise defined in this document have the meanings set forth in the PCI DSS Self-Assessment Questionnaire.

Part 1. Contact Information			
Part 1a. Assessed Entity			
Company name:	AlumnIQ LLC		
DBA (doing business as):	Not Applicable.		
Company mailing address:	10 Verbena Ct., Cheshire, CT 06410		
Company main website:	https://www.alumniq.com/		
Company contact name:	Stephen Rittler		
Company contact title:	Founder / CEO		
Contact phone number:	610-810-1550		
Contact e-mail address:	steve@alumniq.com		

Part 1b. Assessor

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):	Not Applicable	
Qualified Security Assessor		
Company name:	360 Advanced, Inc.	
Company mailing address:	200 Central Ave., Suite 2100, St Petersburg, FL 33701	
Company website:	https://www.360advanced.com	
Lead Assessor Name:	Adam Lassa	
Assessor phone number:	1-866-418-1708	
Assessor e-mail address:	alassa@360advanced.com	
Assessor certificate number:	QSA 206-532	



Part 2. Executive Summary					
Part 2a. Scope Verification					
Services that were INCLUDED i	n the scope of the PCI DSS Asses	sment (select all that apply):			
Name of service(s) assessed:	AlumnIQ Platform Services				
Type of service(s) assessed:					
Hosting Provider:	Managed Services:	Payment Processing:			
☐ Applications / software	☐ Systems security services	☐ POI / card present			
☐ Hardware	☐ IT support				
☐ Infrastructure / Network	☐ Physical security	☐ MOTO / Call Center			
☐ Physical space (co-location)	☐ Terminal Management System	□ ATM			
☐ Storage	☐ Other services (specify):	Other processing (specify):			
☐ Web-hosting services					
☐ Security services					
☐ 3-D Secure Hosting Provider					
☐ Multi-Tenant Service Provider					
☐ Other Hosting (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 2. Executive Summary (continued) 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** (select all that apply): Name of service(s) not assessed: AlumnIQ Signature Events Service Type of service(s) not assessed: **Hosting Provider: Managed Services: Payment Processing:** ☐ Applications / software ☐ Systems security services ☐ POI / card present ☐ Hardware ☐ IT support ☐ MOTO / Call Center ☐ Infrastructure / Network ☐ Physical security ☐ Physical space (co-location) ☐ Terminal Management System \square ATM ☐ Storage Other services (specify): Other processing (specify): ☐ Web-hosting services ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Multi-Tenant Service Provider ☐ Other Hosting (specify): ☐ Fraud and Chargeback ☐ Account Management ☐ 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 AlumnIQ's Signature Events Service was covered were not included in the assessment: under a separate SAQ D assessment. Part 2b. Description of Role with Payment Cards AlumnIQ LLC ("AlumnIQ") provides customers with web-Describe how the business stores, processes, based methods for capturing and transmitting account and/or transmits account data. data directly to their chosen payment processor. The typical method utilized is through an iframe embedded on the customer's white-labeled payment page. The iframe contains a form where the customer's user enters the required account data. Once completed, JavaScript code within the iframe executes to transmit the account data directly to the respective payment processor. Another method involves URL redirection, where instead of using an iframe, the customer's users are provided with a link to the payment processor's owned and managed payment page for direct account data entry. Regardless of the method used, untokenized account data is never stored, transmitted, and / or processed on AlumnIQ's infrastructure. As such, AlumnIQ does not

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purposes of this assessment, AlumnIQ's in-scope environment is referred to as the "PCI environment".

Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.

While AlumnIQ does not maintain a true CDE, there are still processes and system components that can impact the security of account data. The JavaScript code responsible for transmitting account data to the respective payment processor is implemented and deployed using secure development lifecycle processes and is hosted on secure systems. Additionally, URLs provided for direct account data entry on third-party payment processor sites are monitored to ensure they are not replaced or injected with unauthorized or malicious URLs.

maintain a Cardholder Data Environment (CDE). For the

Describe system components that could impact the security of account data.

AlumnIQ's PCI environment is comprised of the following system components, which could impact the security of account data if mis-configured or accessed by unauthorized users:

Network and Application Architecture

AlumnIQ's entire network and application architecture is hosted using Amazon Web Services (AWS) where ultimately, the payment pages with embedded iframes and direct URLs are hosted. These systems are supported on hardened and secured containers [e.g., with Secure Shell Host (SSH) logins disabled] and are deployed and operated on Amazon Elastic Container Service (ECS) with Fargate. Further, containers are ephemeral in nature reducing the attack surface of these systems. Other services within the PCI environment that are provided by, and configured within, AWS include the following:

- AWS CloudTrail
- Amazon CloudWatch
- Amazon Elastic Container Registry (ECR)
- AWS Fargate
- Amazon GuardDuty
- Amazon Identity and Access Management (IAM)
- Amazon Inspector
- AWS Lambda
- Amazon Virtual Private Cloud (VPC)
- AWS Web Application Firewall (WAF)

Software as a Service (SaaS)

AlumnIQ relies on several SaaS solutions for cloud infrastructure hosting, identity and access services, endpoint protection, and code management and



deployment services. Access to these tools is limited to a small handful of personnel based on job role with multifactor authentication (MFA) as an additional layer of security.

Third Party Tools and Services

AlumnIQ relies on various third-party tools and vendors, primarily to support and facilitate payment processing for their customers. These vendors undergo independent PCI DSS assessments of their own, and AlumnIQ annually reviews their PCI Attestation of Compliance (AOC) reports to verify ongoing compliance with account data protection and secure handling standards.



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.

AlumnIQ's PCI environment is primarily comprised of their AWS environment; however, it also includes the various SaaS tools outside of AWS (e.g., payment processing, endpoint protection, and code management). Additionally, as noted in previous sections, untokenized account data is never stored, processed, and / or transmitted on AlumnIQ's own infrastructure.

AlumnIQ's production and web-hosting components reside entirely within AWS. The environment is encapsulated within a VPC with defined Network Access Control Lists (NACLs) configured to restrict and control inbound and outbound traffic at the subnet level. Within the VPC, systems are further organized into public and private subnets based on their function across multiple availability zones. External requests from the Internet are filtered and appropriately routed through secure protocols [e.g., Hypertext Transfer Protocol Secure (HTTPS)] using application load balancers (ALB) and further inspected using AWS WAF.

Customer environments are containerized using ECS. Specifically, each customer environment (hosting white-labeled pages and handling web requests) is isolated within their own cluster. The containers within these customer environments ultimately host the iframes that execute JavaScript code for transmitting account data to their respective payment processors or host the provided URLs for redirection to the respective third-party payment processor's own site.

AlumnIQ personnel, based on their role, utilize an authorized workstation / laptop to access the AWS environment, along with other SaaS services in scope. These devices are hardened and secured using a mobile device management system (MDM).

Access to systems in-scope outside of AWS is controlled through Google's single sign-on (SSO) services. MFA is also enforced on all systems within the PCI environment.

Indicate whether the environment includes segmentation to reduce the scope of the assessment.	☐ Yes	⊠ No	
(Refer to "Segmentation" section of PCI DSS for guidance on segmentation.)			

Part 2d. In-Scope Locations/Facilities

List all types of physical locations/facilities—for example, corporate offices, data centers, call centers, and mail rooms—in scope for the PCI DSS assessment.

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	Total number of locations	
Facility Type	(How many locations of this type are in scope)	Location(s) of facility (city, country)
Example: Data centers	3	Boston, MA, USA
AWS (us-east-1)	1	Virginia, USA



Part 2e. PCI SSC Validated Products and Solutions

☐ Yes No	
Does the entity use any item identified on any PCI SSC Lists of Validated Products and Solutions*?	

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)
Not Applicable.	Not Applicable.	Not Applicable.	Not Applicable.	Not Applicable.

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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, Point to Point Encryption (P2PE) solutions, Software-Based PIN Entry on COTS (SPoC) solutions, Contactless Payments on COTS (CPoC) solutions, and Mobile Payments on COTS (MPoC) products.

Part 2f. Third-Party Service Providers

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)	⊠ Yes	☐ No
•	Manage system components included in the scope of the entity's PCI DSS assessment—for example, via network security control services, anti-malware services, security incident and event management (SIEM), contact and call centers, web-hosting services, and laaS, PaaS, SaaS, and FaaS cloud providers.	⊠ Yes	□No
•	Could impact the security of the entity's CDE—for example, vendors providing support via remote access, and/or bespoke software developers.	⊠ Yes	☐ No

If Yes:

Name of service provider:	Description of service(s) provided:
Amazon Web Services, Inc.	Cloud hosted infrastructure and services supporting the production environment.
Blackbaud, Inc.	Payment gateway / processing services.
Cloudflare, Inc.	Virtual Private Network (VPN) services.
GitHub, Inc.	Code management and deployment services.
Google LLC	Identity management and SSO services.
PayPal, Inc. (Braintree)	Payment gateway / processing services.
Spreedly, Inc.	Payment gateway / processing services.

Note: Requirement 12.8 applies to all entities in this list.

Part 2g. Summary of Assessment

(SAQ Section 2 and related appendices)

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: AlumnIQ Platform Services

Name of Colvide Added Col. Additing Flatform Colvides						
	Requirement Responses More than one response may be selected for a given requirement. Indicate all responses that apply.					
PCI DSS Requirement	In Place	In Place with CCW	Not Applicable	Not Tested	Not in Place	
Requirement 1:	\boxtimes					
Requirement 2:						
Requirement 3:						
Requirement 4:						
Requirement 5:			\boxtimes			
Requirement 6:						
Requirement 7:						
Requirement 8:						
Requirement 9:			\boxtimes			
Requirement 10:						
Requirement 11:			\boxtimes			
Requirement 12:						
Appendix A1:						
Appendix A2:						
Justification for Approach						

- **1.2.6, 2.2.5**: AlumnIQ does not utilize or permit the use of insecure services, protocols, or daemons within the inscope environment.
- **1.4.4**: AlumnIQ does not store untokenized cardholder data on any form of persistent storage or hardcopy material.
- **2.3.1, 2.3.2, 4.2.1.2**: AlumnIQ's PCI environment resided solely within data centers managed by AWS, a Level 1 PCI DSS-validated service provider, who does not have wireless networks in scope within the hosted environment.
- 3.1.1, 3.1.2, 3.2.1, 3.3.1, 3.3.1.1, 3.3.1.2, 3.3.1.3, 3.3.2, 3.3.3, 3.4.1, 3.4.2, 3.5.1, 3.5.1.1, 3.5.1.2, 3.5.1.3, 3.6.1, 3.6.1.1, 3.6.1.2, 3.6.1.3, 3.6.1.4, 3.7.1, 3.7.2, 3.7.3, 3.7.4, 3.7.5, 3.7.6, 3.7.7, 3.7.8, 3.7.9, 7.2.6: AlumnIQ does not store, process, or transmit untokenized account data within its PCI environment.
- **4.2.2**: AlumnIQ prohibits the transmission of cardholder data via end-user messaging technologies.
- 5.3.3, 6.4.3, 7.2.4, 7.2.5, 7.2.5.1, 8.3.6, 8.5.1, 8.6.1, 8.6.2, 8.6.3, 11.6.1, 12.3.3, 12.3.4, 12.5.2.1, 12.5.3, 12.6.2, 12.6.3.1, 12.10.7, A1.1.4: These are future-dated requirements and are not required to be tested until the future date has passed.
- **8.2.7**: AlumnIQ did not have third parties who accessed system components within the PCI environment.
- **8.3.9**: Passwords/Passphrases are not the only authentication factors for user access; MFA is required for access to the in-scope system components.
- **8.3.10, 8.3.10.1**: AlumnIQ does not provide customer user access to cardholder data.
- **9.2.2**: AlumnIQ's PCI environment resided solely within data centers managed by AWS, a Level 1 PCI DSS-validated service provider, who does not make public network jacks available in public spaces within the hosted environment.
- **9.2.4:** AlumnIQ's PCI environment resided solely within data centers managed by AWS, a Level 1 PCI DSS-validated service provider, who does not utilize or permit the use of crash carts or consoles within the hosted environment.
- **9.4.1.1**, **9.4.1.2**, **9.4.2**, **9.4.3**, **9.4.4**, **9.4.5**, **9.4.5.1**, **9.4.6**, **9.4.7**: AlumnIQ does not store CHD onto any media type, including hard-copy materials, and their PCI environment resided solely within data centers managed by AWS, a Level 1 PCI DSS-validated service provider, who does not directly store, process, or transmit CHD and only provides hosting services to its clients.

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

	9.5.1, 9.5.1.1, 9.5.1.2, 9.5.1.2.1, 9.5.1.3, A2.1.1, A2.1.2, A2.1.3: AlumnIQ does not support or manage devices that capture payment card data via direct physical interaction.
	11.4.5 , 11.4.6 : Segmentation was not used to isolate the PCI environment from other networks.
For any Not Tested responses, identify which sub- requirements were not tested and the reason.	Not Applicable.

Section 2: Self-Assessment Questionnaire D for Service Providers

Self-assessment completion date:	January 24, 202	25
Were any requirements in the SAQ 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 SAQ D (Se	ection 2), dated (Self-assessment completion date
January 24, 2025).	

		Affected Requirement	Details of how legal constraint prevents requirement from being met			
	This option requires additional review from the entity to which this AOC will be submitted. <i>If selected, complete the following:</i>					
	mar othe App (Se inclu	Compliant but with Legal exception: One or more assessed requirements in the PCI DSS SAQ 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 1) In Place, 2) In Place with CCW, or 3) 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 included in this SAQ except those noted as Not Tested above or as Not in Place due to a legal restriction.				
	An e	entity submitting this form with	a a Non-Compliant status may be required to complete the Action confirm with the entity to which this AOC will be submitted <i>before</i>			
	Non-Compliant: Not all sections of the PCI DSS SAQ 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 the PCI DSS requirements included in this SAQ. Target Date for Compliance: YYYY-MM-DD					
\boxtimes	Compliant: All sections of the PCI DSS SAQ are complete, and all assessed requirements are marked as being either 1) In Place, 2) In Place with CCW, or 3) Not Applicable, resulting in an overall COMPLIANT rating; thereby AlumnIQ LLC has demonstrated compliance with all PCI DSS requirements included in this SAQ except those noted as Not Tested above.					
Select	t one	:				
			SAQ D noted above, each signatory identified in any of Parts 3b–3d, upliance status for the entity identified in Part 2 of this document.			
			nents have not been assessed and were therefore marked as Not ment not assessed is noted as Not Tested in Part 2g above.			
	⊠ Fı	·	en assessed therefore no requirements were marked as Not Tested in			
Indicat	te bel	ow whether a full or partial PC	CI DSS assessment was completed:			

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Part 3a. Service Provider Acknowledgement						
Signatory(s) confirms:						
(Select all that apply) PCI DSS Self-Assessment Questionnaire D, Version 4.0.1, was completed according to the instructions						
	PCI DSS Self-Assessment Questionnaire D, Version 4.0.1, was completed according to the instructions therein.					
	All information within the above-referenced SAQ and in this attestation fairly represents the results of the entity's assessment in all material respects.					
	PCI DSS controls will be maintained at all times, as applicable to the entity's environment.					
Part	3b. Service Provider Attestation					
Stephen C. Rittler						
Signature of Service Provider Executive Officer ↑			Date: January 29, 2025			
Serv	ce Provider Executive Officer Name: S	Stephen Rittler	Title: Founder / CEO			
Part	3c. Qualified Security Assessor (C	OSA) Acknowledge	ment			
	QSA was involved or assisted with	SQSA performed				
this assessment, indicate the role performed:		☐ QSA provided other assistance.				
		If selected, describe all role(s) performed:				
Adaw Lassa						
Signature of Lead QSA ↑			Date: January 29, 2025			
Lea	d QSA Name: Adam Lassa					
Christopher Gudzak						
Signature of Duly Authorized Officer of QSA Company ↑		Date: January 29, 2025				
Duly Authorized Officer Name: Christopher Gudzak		r Gudzak	QSA Company: 360 Advanced, Inc.			
Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement						
	ISA(s) was involved or assisted with	Τ	d testing procedures.			
this a	assessment, indicate the role	☐ ISA(s) provided other assistance.				
perto	rmed:	If selected, describe all role(s) performed:				

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 a Non-Compliant status 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 a brief description of the actions being taken to meet the requirement.

PCI DSS	Description of Descripement	Compliant to PCI DSS Requirements		Remediation Date and Actions
Requirement	Description of Requirement	(Selec	t One)	(If "NO" selected for any
		YES	NO	Requirement)
1	Install and maintain network security controls			
2	Apply secure configurations to all system components			
3	Protect stored account data			
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			
8	Identify users and authenticate access to system components			
9	Restrict physical access to cardholder data			
10	Log and monitor all access to system components and cardholder data			
11	Test security systems and networks regularly			
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			

Note: The PCI Security Standards Council is a global standards body that provides resources for payment security professionals developed collaboratively with our stakeholder community. Our materials are accepted in numerous compliance programs worldwide. Please check with your individual compliance-accepting organization to ensure that this form is acceptable in its program. For more information about PCI SSC and our stakeholder community please visit: https://www.pcisecuritystandards.org/about_us/.

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Signature Certificate

Reference number: N9DYT-MLRQD-7JB8W-FEJBX

Signer Timestamp Signature

Christopher Gudzak

Email: cgudzak@360advanced.com

 Sent:
 29 Jan 2025 21:52:52 UTC

 Viewed:
 29 Jan 2025 22:00:44 UTC

 Signed:
 29 Jan 2025 22:01:05 UTC

Recipient Verification:

✓ Email verified 29 Jan 2025 22:00:44 UTC

Christopher Gudzak

IP address: 144.129.22.131 Location: Largo, United States

Stephen Rittler

Email: steve@alumniq.com

 Sent:
 29 Jan 2025 21:52:52 UTC

 Viewed:
 29 Jan 2025 22:19:49 UTC

 Signed:
 29 Jan 2025 22:28:36 UTC

Recipient Verification:

✓ Email verified 29 Jan 2025 22:19:49 UTC

Stephen C. Rittler

IP address: 172.59.8.250

Location: New Haven, United States

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29 Jan 2025 22:31:23 UTC

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Reference number: N9DYT-MLRQD-7JB8W-FEJBX

Signer Timestamp Signature

Adam Lassa

Email: alassa@360advanced.com

 Sent:
 29 Jan 2025 21:52:52 UTC

 Viewed:
 29 Jan 2025 22:29:40 UTC

 Signed:
 29 Jan 2025 22:31:23 UTC

Recipient Verification:

✓ Email verified 29 Jan 2025 22:29:40 UTC

IP address: 70.126.0.16

Location: Riverview, United States

Adam Lassa

Document completed by all parties on:

29 Jan 2025 22:31:23 UTC

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