



# Payment Card Industry Data Security Standard

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

**For use with PCI DSS Version 4.0.1**

Revision 1

Publication Date: December 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:	<a href="https://www.alumniq.com/">https://www.alumniq.com/</a>
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
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##### Qualified Security Assessor

Company name:	360 Advanced, Inc.
Company mailing address:	200 Central Ave., Suite 2100, St Petersburg, FL 33701
Company website:	<a href="https://www.360advanced.com">https://www.360advanced.com</a>
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 in the scope of the PCI DSS Assessment** (select all that apply):

Name of service(s) assessed: AlumnIQ Platform Services

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 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:		
<b>Hosting Provider:</b> <input type="checkbox"/> Applications / software <input type="checkbox"/> Hardware <input type="checkbox"/> Infrastructure / Network <input type="checkbox"/> Physical space (co-location) <input type="checkbox"/> Storage <input type="checkbox"/> Web-hosting services <input type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input type="checkbox"/> Multi-Tenant Service Provider <input type="checkbox"/> Other Hosting (specify):	<b>Managed Services:</b> <input type="checkbox"/> Systems security services <input type="checkbox"/> IT support <input type="checkbox"/> Physical security <input type="checkbox"/> Terminal Management System <input type="checkbox"/> Other services (specify):	<b>Payment Processing:</b> <input type="checkbox"/> POI / card present <input type="checkbox"/> Internet / e-commerce <input type="checkbox"/> MOTO / Call Center <input type="checkbox"/> ATM <input type="checkbox"/> 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:	AlumnIQ's Signature Events Service was covered under a separate SAQ D assessment.	

**Part 2b. Description of Role with Payment Cards**

Describe how the business stores, processes, and/or transmits account data.	<p>AlumnIQ LLC ("AlumnIQ") provides customers with web-based methods for capturing and transmitting account 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.</p> <p>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.</p> <p>Regardless of the method used, untokenized account data is never stored, transmitted, and / or processed on AlumnIQ's infrastructure. As such, AlumnIQ does not maintain a Cardholder Data Environment (CDE). For the</p>
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	<p>purposes of this assessment, AlumniIQ’s in-scope environment is referred to as the “PCI environment”.</p>
<p>Describe how the business is otherwise involved in or has the ability to impact the security of its customers’ account data.</p>	<p>While AlumniIQ 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.</p>
<p>Describe system components that could impact the security of account data.</p>	<p>AlumniIQ’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:</p> <p><b><u>Network and Application Architecture</u></b></p> <p>AlumniIQ’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:</p> <ul style="list-style-type: none"> <li>• AWS CloudTrail</li> <li>• Amazon CloudWatch</li> <li>• Amazon Elastic Container Registry (ECR)</li> <li>• AWS Fargate</li> <li>• Amazon GuardDuty</li> <li>• Amazon Identity and Access Management (IAM)</li> <li>• Amazon Inspector</li> <li>• AWS Lambda</li> <li>• Amazon Virtual Private Cloud (VPC)</li> <li>• AWS Web Application Firewall (WAF)</li> </ul> <p><b><u>Software as a Service (SaaS)</u></b></p> <p>AlumniIQ 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 multi-factor authentication (MFA) as an additional layer of security.</p> <p><b><u>Third Party Tools and Services</u></b></p>

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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.

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## Part 2. Executive Summary *(continued)*

### 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.

*(Refer to "Segmentation" section of PCI DSS for guidance on segmentation.)*

Yes  No

### 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.

Facility Type	Total number of locations (How many locations of this type are in scope)	Location(s) of facility (city, country)
AWS Region	1	Virginia, USA (us-east-1)

## Part 2. Executive Summary *(continued)*

### Part 2e. PCI SSC Validated Products and Solutions

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)
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](http://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 2. Executive Summary *(continued)*

### 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:

<ul style="list-style-type: none"> <li>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)</li> </ul>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> <li>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 IaaS, PaaS, SaaS, and FaaS cloud providers.</li> </ul>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> <li>Could impact the security of the entity's CDE—for example, vendors providing support via remote access, and/or bespoke software developers.</li> </ul>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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.
Spredly, Inc.	Payment gateway / processing services.

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

## Part 2. Executive Summary *(continued)*

### 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

PCI DSS Requirement	Requirement Responses				
	More than one response may be selected for a given requirement. Indicate all responses that apply.				
	In Place	In Place with CCW	Not Applicable	Not Tested	Not in Place
Requirement 1:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 2:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 3:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 4:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 5:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 6:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 7:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 8:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 9:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 10:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 11:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 12:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Appendix A1:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Appendix A2:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Justification for Approach

For any Not Applicable responses, identify which sub-requirements were not applicable and the reason.

- 1.2.6 AlumnIQ does not utilize or permit the use of insecure services, protocols, or daemons within the in-scope environment.
- 1.4.4 AlumnIQ does not store untokenized cardholder data on any form of persistent storage or hardcopy material.
- 2.2.5 AlumnIQ does not utilize or permit the use of insecure services, protocols, or daemons within the in-scope environment.
- 2.3.1 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.
- 2.3.2
- 3.1.1 AlumnIQ does not store, process, or transmit untokenized account data within its PCI environment.
- 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	
	4.2.1.	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.
	2	
	4.2.2	AlumniQ prohibits the transmission of cardholder data via end-user messaging technologies.
	6.5.2	There have been no significant changes made to the in-scope PCI environment within the past 12 months.
	7.2.6	AlumniQ does not store, process, or transmit untokenized account data within its PCI environment.
	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	AlumniQ does not provide customer user access to cardholder data.
	8.3.10	
	.1	
	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	

	<p>9.4.1.1 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.</p> <p>9.4.1.2</p> <p>9.4.2</p> <p>9.4.3</p> <p>9.4.4</p> <p>9.4.5</p> <p>9.4.5.1</p> <p>9.4.6</p> <p>9.4.7</p> <p>9.5.1 AlumniQ does not support or manage devices that capture payment card data via direct physical interaction.</p> <p>9.5.1.1</p> <p>9.5.1.2</p> <p>9.5.1.2.1</p> <p>9.5.1.3</p> <p>10.7.1 This requirement was superseded by Requirement 10.7.2 as of 31 March 2025.</p> <p>11.3.1.3 There have been no significant changes made to the in-scope PCI environment within the past 12 months.</p> <p>11.3.2.1</p> <p>11.4.5 Segmentation was not used to isolate the PCI environment from other networks.</p> <p>11.4.6</p> <p>12.3.2 AlumniQ did not utilize a Customized Approach to meet any requirements.</p> <p>12.5.3 No significant changes to the organizational structure occurred within the past 12 months that impacted the scope of AlumniQ's PCI environment or applicability of PCI DSS controls.</p> <p>A2.1.1 AlumniQ does not support or manage devices that capture payment card data via direct physical interaction.</p> <p>A2.1.2</p> <p>A2.1.3</p>
<p>For any Not Tested responses, identify which sub-requirements were not tested and the reason.</p>	<p>Not Applicable.</p>

## Section 2: Self-Assessment Questionnaire D for Service Providers

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Self-assessment completion date:	January 13, 2026
Were any requirements in the SAQ 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 SAQ D (Section 2), dated (Self-assessment completion date January 13, 2026).

Indicate below whether a full or partial PCI DSS assessment was completed:

- Full** – All requirements have been assessed therefore no requirements were marked as Not Tested in the SAQ.
- Partial** – One or more requirements have not been assessed and were therefore marked as Not Tested in the SAQ. Any requirement not assessed is noted as Not Tested in Part 2g above.

Based on the results documented in the SAQ D 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:

<input checked="" type="checkbox"/>	<p><b>Compliant:</b> 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 <b>COMPLIANT</b> rating; thereby (<i>AlumniQ LLC</i>) has demonstrated compliance with all PCI DSS requirements included in this SAQ except those noted as Not Tested above.</p>								
<input type="checkbox"/>	<p><b>Non-Compliant:</b> 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 <b>NON-COMPLIANT</b> rating, thereby (<i>AlumniQ LLC</i>) has not demonstrated compliance with the PCI DSS requirements included in this SAQ.</p> <p><b>Target Date</b> for Compliance: <i>Not Applicable</i>.</p> <p>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 <i>before completing Part 4</i>.</p>								
<input type="checkbox"/>	<p><b>Compliant but with Legal exception:</b> 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 <b>COMPLIANT BUT WITH LEGAL EXCEPTION</b> rating; thereby (<i>AlumniQ LLC</i>) 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.</p> <p>This option requires additional review from the entity to which this AOC will be submitted. <i>If selected, complete the following:</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 40%;">Affected Requirement</th> <th>Details of how legal constraint prevents requirement from being met</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Affected Requirement	Details of how legal constraint prevents requirement from being met						
Affected Requirement	Details of how legal constraint prevents requirement from being met								

### Part 3a. Service Provider Acknowledgement

Signatory(s) confirms:

(Select all that apply)

<input checked="" type="checkbox"/>	PCI DSS Self-Assessment Questionnaire D, Version 4.0 was completed according to the instructions therein.
<input checked="" type="checkbox"/>	All information within the above-referenced SAQ and in this attestation fairly represents the results of the entity's assessment in all material respects.
<input checked="" type="checkbox"/>	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 27, 2026
Service Provider Executive Officer Name: Stephen Rittler	Title: Founder / CEO

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

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

QSA performed testing procedures.

QSA provided other assistance.

If selected, describe all role(s) performed:

*Adam Lassa*

Signature of Lead QSA ↑	Date: January 27, 2026
Lead QSA Name: Adam Lassa	

*Christopher Gudzak*

Signature of Duly Authorized Officer of QSA Company ↑	Date: January 27, 2026
Duly Authorized Officer Name: Christopher Gudzak	QSA Company: 360 Advanced, Inc.

### Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement

If an ISA(s) was involved or assisted with this assessment, indicate the role performed:

ISA(s) performed testing procedures.

ISA(s) provided other assistance.

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 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 network security controls	<input type="checkbox"/>	<input type="checkbox"/>	
2	Apply secure configurations to all system components	<input type="checkbox"/>	<input type="checkbox"/>	
3	Protect stored account data	<input type="checkbox"/>	<input type="checkbox"/>	
4	Protect cardholder data with strong cryptography during transmission over open, public networks	<input type="checkbox"/>	<input type="checkbox"/>	
5	Protect all systems and networks from malicious software	<input type="checkbox"/>	<input type="checkbox"/>	
6	Develop and maintain secure systems and software	<input type="checkbox"/>	<input type="checkbox"/>	
7	Restrict access to system components and cardholder data by business need to know	<input type="checkbox"/>	<input type="checkbox"/>	
8	Identify users and authenticate access to system components	<input type="checkbox"/>	<input type="checkbox"/>	
9	Restrict physical access to cardholder data	<input type="checkbox"/>	<input type="checkbox"/>	
10	Log and monitor all access to system components and cardholder data	<input type="checkbox"/>	<input type="checkbox"/>	
11	Test security systems and networks regularly	<input type="checkbox"/>	<input type="checkbox"/>	
12	Support information security with organizational policies and programs	<input type="checkbox"/>	<input type="checkbox"/>	
Appendix A1	Additional PCI DSS Requirements for Multi-Tenant Service Providers	<input type="checkbox"/>	<input type="checkbox"/>	
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"/>	

**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/](https://www.pcisecuritystandards.org/about_us/).

# CERTIFICATE *of* SIGNATURE

REF. NUMBER  
KQPGW-SG2GV-PYAPB-IWPFC

DOCUMENT COMPLETED BY ALL PARTIES ON  
28 JAN 2026 01:55:12  
UTC

## SIGNER

## TIMESTAMP

## SIGNATURE

**CHRISTOPHER GUDZAK**

EMAIL  
CGUDZAK@360ADVANCED.COM

SENT  
27 JAN 2026 22:56:25

VIEWED  
27 JAN 2026 22:56:34

SIGNED  
27 JAN 2026 22:56:46

*Christopher Gudzak*

IP ADDRESS  
35.136.71.145

LOCATION  
ST. PETERSBURG, UNITED STATES

## RECIPIENT VERIFICATION

EMAIL VERIFIED  
27 JAN 2026 22:56:34

**ADAM LASSA**

EMAIL  
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SENT  
27 JAN 2026 22:56:25

VIEWED  
27 JAN 2026 23:01:50

SIGNED  
27 JAN 2026 23:05:13

*Adam Lassa*

IP ADDRESS  
217.216.98.191

LOCATION  
MIAMI, UNITED STATES

## RECIPIENT VERIFICATION

EMAIL VERIFIED  
27 JAN 2026 23:01:50



# CERTIFICATE *of* SIGNATURE

REF. NUMBER  
KQPGW-SG2GV-PYAPB-IWPFC

DOCUMENT COMPLETED BY ALL PARTIES ON  
28 JAN 2026 01:55:12  
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## SIGNER

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## TIMESTAMP

SENT  
27 JAN 2026 22:56:25

VIEWED  
28 JAN 2026 01:52:52

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28 JAN 2026 01:55:12

## SIGNATURE



IP ADDRESS  
172.59.13.163

LOCATION  
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## RECIPIENT VERIFICATION

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