



# **Payment Card Industry Data Security Standard**

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## **Attestation of Compliance for Report on Compliance – Service Providers**

**Version 4.0**

Revision 1

Publication Date: December 2022

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

**Entity Name: Rebilly, Inc. dba Rebilly, SRL**

**Assessment End Date: 7-Aug-2024**

**Date of Report as noted in the Report on Compliance: 14-Aug-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	
<b>Part 1a. Assessed Entity (ROC Section 1.1)</b>	
Company name:	Rebilly, Inc.
DBA (doing business as):	Rebilly, SRL
Company mailing address:	Building #3, Suites G1, 2 & 3 Manor Lodge Complex Lodge Hill St. Michael Barbados
Company main website:	www.rebilly.com
Company contact name:	Samuel Lafrenaye Lamontagne
Company contact title:	DevOPS Security Manager
Contact phone number:	512.710.1640
Contact e-mail address:	samuel@rebilly.com
<b>Part 1b. Assessor (ROC Section 1.1)</b>	
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:	Dara Security
Company mailing address:	10580 N. McCarran Blvd. #115-337 Reno NV 89503
Company website:	www.darasecurity.com
Lead Assessor name:	Barry Johnson
Assessor phone number:	775.622.5386
Assessor e-mail address:	barryj@darasecurity.com

Assessor certificate number:	040-001
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## Part 2. Executive Summary

### Part 2a. Scope Verification

#### Services that were **INCLUDED** in the scope of the Assessment (select all that apply):

Name of service(s) assessed:	Rebilly Saas Cloud Based Billing Service for Subscription Businesses
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Type of service(s) assessed:
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Hosting Provider:	Managed Services:	Payment Processing:
<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):	<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):	<input type="checkbox"/> POI / card present <input checked="" type="checkbox"/> Internet / e-commerce <input type="checkbox"/> MOTO / Call Center <input type="checkbox"/> ATM <input checked="" type="checkbox"/> Other processing (specify): Recurring payments
<input type="checkbox"/> Account Management	<input checked="" type="checkbox"/> Fraud and Chargeback	<input checked="" type="checkbox"/> Payment Gateway/Switch
<input type="checkbox"/> Back-Office Services	<input type="checkbox"/> Issuer Processing	<input type="checkbox"/> Prepaid Services
<input checked="" 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):		

**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 **NOT INCLUDED** in the scope of the Assessment (select all that apply):

Name of service(s) not assessed:

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 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:

**Part 2b. Description of Role with Payment Cards (ROC Section 2.1)**

Describe how the business stores, processes, and/or transmits account data.

Rebilly is a payment gateway that accepts transactions via proprietary API (<https://api.rebilly.com>) through AWS and on to one of several destinations/acquirers. Once authorization is received Rebilly returns a token to the merchant via their API.

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

Rebilly stores CHD for recurring billing and for token conversion related to chargeback management

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

Application and web servers along with database servers used for storage.

**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.*

Assessment reviewed the environment to include the network deployed at the co-location facilities and in the corporate office, access by entity to the facility from the office locations, and connectivity to and from supported processors. In addition, the development and management of systems and the internal applications were reviewed.

Indicate whether the environment includes segmentation to reduce the scope of the Assessment.

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

Yes  No

**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)
<i>Example: Data centers</i>	3	<i>Boston, MA, USA</i>
Corporate office	2	Montreal QC Canada Austin TX USA
Cloud Data Center	1	AWS Data Center

**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

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

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 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)</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:**

<b>Name of Service Provider:</b>	<b>Description of Services Provided:</b>
Amazon Web Services	Cloud Service Provider
A1Gateway ACI Adyen Airpay AmazonPay AmexVPC ApcoPay AsiaPaymentGateway AstroPayCard AuthorizeNet Awepay Bambora BankSEND BitPay BlueSnap BraintreePayments Cardknox Cashflows CASHlib Cashterminal CashToCode CauriPayment Cayan CCAvenue Chase CheckoutCom Circle Citadel Clearhaus	Payment Gateways



CODVoucher  
Coinbase  
CoinGate  
CoinPayments  
Conekta  
Coppr  
Credorax  
Cryptonator  
CyberSource  
DataCash  
Dengi  
Dimoco  
Directa24  
dLocal  
Dragonphoenix  
EBANX  
ecoPayz  
EcorePay  
Elavon  
eMerchantPay  
EMS  
ePay  
EPG  
EPro  
Euteller  
eZeeWallet  
ezyEFT  
FasterPay  
Finrax  
FinTecSystems  
Flexepin  
Forte  
FundSend  
GET  
Gigadat  
GlobalOnePay  
Gooney  
Gpaysafe  
Greenbox  
HiPay  
iCanPay  
ICEPAY  
iCheque  
iDebit  
Ilixium  
Ingenico  
INOVAPAY

Inovio InstaDebit Intuit IpayOptions Jeton JetPay Khelocard Klarna Konnektive Ioonie LPG MaxiCash MercadoPago MiFinity Moneris MtaPay MuchBetter MyFatoorah Neosurf Netbanking Neteller NGenius NinjaWallet NMI NOWPayments NuaPay OchaPay Onlineueberweisen OnRamp Pagadito Pagsmile Panamerican ParamountEft ParamountInterac Pay4Fun PayCash PayClub Payeezy Payflow PaymentAsia PaymenTechnologies PaymentsOS Paymero Paynote PayPal Payper Payr	
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Paysafe  
Paysafecard  
Paysafecash  
PayTabs  
PayULatam  
Payvision  
Piastrix  
Pin4Pay  
Plugnpay  
PostFinance  
PPRO  
Prosa  
Rapyd  
Realex  
Realtime  
Redsys  
Rotessa  
RPN  
Safecharge  
Sagepay  
SaltarPay  
SeamlessChex  
SecureTrading  
SecurionPay  
Skrill  
SmartInvoice  
SMSVoucher  
Sofort  
SparkPay  
STPMexico  
Stripe  
Telr  
ToditoCash  
Truevo  
Trustly  
TrustsPay  
TWINT  
UPayCard  
USAePay  
VantivLitle  
VCreditos  
vegaaH  
Wallet88  
Walpay  
WesternUnion  
Wirecard  
WorldlineAtosFrankfurt

Worldpay	
XPay	
Zimpler	
Zotapay	

**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.*

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:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 2:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 3:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 4:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 5:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 6:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 7:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 8:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 9:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 10:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 11:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 12:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Appendix A1:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Appendix A2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3.2)

Date Assessment began: <b>Note:</b> This is the first date that evidence was gathered, or observations were made.		22-Jun-2024
Date Assessment ended: <b>Note:</b> This is the last date that evidence was gathered, or observations were made.		7-Aug-2024
Were any requirements in the ROC unable to be met due to a legal constraint?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were any testing activities performed remotely? If yes, for each testing activity below, indicate whether remote assessment activities were performed:		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
• Examine documentation	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
• Interview personnel	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
• Examine/observe live data	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
• Observe process being performed	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
• Observe physical environment	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
• Interactive testing	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
• Other:	<input type="checkbox"/> Yes	<input type="checkbox"/> No

## Section 3 Validation and Attestation Details

### Part 3. PCI DSS Validation (ROC Section 1.7)

This AOC is based on results noted in the ROC dated *(Date of Report as noted in the ROC 14-Aug-2024)*.

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

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

Based on the results documented in 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*):

<input checked="" type="checkbox"/>	<p><b>Compliant:</b> 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 <b>COMPLIANT</b> rating; thereby Rebilly, Inc. dba Rebilly, SRL has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above.</p>						
<input type="checkbox"/>	<p><b>Non-Compliant:</b> 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 <b>NON-COMPLIANT</b> rating; thereby <i>(Service Provider Company Name)</i> has not demonstrated compliance with PCI DSS requirements.</p> <p><b>Target Date</b> for Compliance: YYYY-MM-DD</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 before completing Part 4.</p>						
<input type="checkbox"/>	<p><b>Compliant but with Legal exception:</b> 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 <b>COMPLIANT BUT WITH LEGAL EXCEPTION</b> rating; thereby <i>(Service Provider Company Name)</i> 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.</p> <p>This option requires additional review from the entity to which this AOC will be submitted.</p> <p><i>If selected, complete the following:</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #cccccc;"> <th style="text-align: left;">Affected Requirement</th> <th style="text-align: left;">Details of how legal constraint prevents requirement from being met</th> </tr> </thead> <tbody> <tr> <td style="height: 20px;"> </td> <td> </td> </tr> <tr> <td style="height: 20px;"> </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"/>	The ROC was completed according to <i>PCI DSS</i> , Version 4.0 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 the 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

*Samuel L Lamontagne*

Signature of Service Provider Executive Officer ↑

Date: 14-Aug-2024

Service Provider Executive Officer Name: Samuel L Lamontagne

Title: Sr. Devops Security Manager

### 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:

*Barry Johnson*

Signature of Lead QSA ↑

Date: 14-Aug-2024

Lead QSA Name: Barry Johnson

*Barry Johnson*

Signature of Duly Authorized Officer of QSA Company ↑

Date: 14-Aug-2024

Duly Authorized Officer Name: Barry Johnson

QSA Company: Dara Security

### 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 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 Requirement)
		YES	NO	
1	Install and maintain network security controls	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2	Apply secure configurations to all system components	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3	Protect stored account data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4	Protect cardholder data with strong cryptography during transmission over open, public networks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5	Protect all systems and networks from malicious software	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6	Develop and maintain secure systems and software	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7	Restrict access to system components and cardholder data by business need to know	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8	Identify users and authenticate access to system components	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9	Restrict physical access to cardholder data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10	Log and monitor all access to system components and cardholder data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11	Test security systems and networks regularly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12	Support information security with organizational policies and programs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Appendix A1	Additional PCI DSS Requirements for Multi-Tenant Service Providers	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	

