



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:	Genius Software Solutions Limited
DBA (doing business as):	Genius Software Solutions Limited
Company mailing address:	1439 Cumbernauld Road, Glasgow G33 1AN
Company main website:	www.geniusssl.com
Company contact name:	Elaine Gallacher
Company contact title:	Director
Contact phone number:	0141 280 0275
Contact e-mail address:	egallacher@geniusssl.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:	Not Applicable
Company mailing address:	
Company website:	
Lead Assessor Name:	
Assessor phone number:	
Assessor e-mail address:	
Assessor certificate number:	

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: DTMF Payment Processing, IVR Payments

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: Customer Portal (Adept)/ Website Payments (SafePay)

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:

Any web/ecommerce payments are taken using the hosted payments page. These are out of scope as they utilize the hosted payment page provided by Global Payments.

Part 2b. Description of Role with Payment Cards

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

We have developed software to allow customers to enter their card details via their telephone keypad whilst on the phone to a call centre agent. The keytones are masked so that the agent hears the 0 tone for all keypresses. The call recording can be automatically paused, and if not, tones are masked within the recording.

We also facilitate self serve payments via an IVR, where the customer completes validation and enters all details using their keypad via the IVR.

The payment service captures the data in memory and passes this via an API to the payment processor. The card details are only held in memory for as long as is required to pass to the payment processor.

	We also provide the ability to pay via a website (SafePay, or Adept Portal). These are out of scope as they utilize the hosted payment page provided by Global Payments.
Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.	Our solution allows customers to securely process card payments with no risk that the call centre agent can access the details either live on the call or afterwards via a call recording. Similarly via the IVR there is no direct access to the data as it is not stored.
Describe system components that could impact the security of account data.	Account data is held in memory for a short period of time before being passed to the payment processor, and then promptly being disposed of.

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.*

The card details are captured via the customer entering the numbers via their telephone keypad. This is captured on the telephony server (for both IVR and agent DTMF), and passed to the payment service (in memory) which then passes to the payment gateway. It is only these 2 areas that process the card details. Connected items include the dialler application (making outbound/receiving inbound calls) which is connected to the telephone servers and then the telephony carriers which handle the calls to the end customer. Agents log into the dialler using a telephone extension and an application (via https) from their own 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)
<i>Example: Data centers</i>	3	<i>Boston, MA, USA</i>
Data Centre	3	Glasgow (UK), Dublin (ROI), London(UK)

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)

* 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 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"> 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) 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> 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. 	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> Could impact the security of the entity's CDE—for example, vendors providing support via remote access, and/or bespoke software developers. 	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

If Yes:

Name of service provider:	Description of service(s) provided:
Global Payments	Processing Card Payments
Iomart	CoLocation Services (power, rackspace, bandwidth)
Equinix	CoLocation Services (power, rackspace, bandwidth)
OVH	Cloud Hosting Provider (Hosted Private Cloud)

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:

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 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 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Appendix A1:	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Appendix A2:	<input checked="" 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.

1.3.3, 2.3.1, 2.3.2, 4.2.1.2, 11.2 – no wireless environment connected to CDE
 3.3.3 – no issuing services
 3.3.1.3 – PIN not stored
 3.3.2 – SAD not stored
 4.2.2 – no end user messaging
 7.2.6, 9.4, 10.2.1.1 – cardholder data not stored
 8.2.3 – no access to customer premises

	8.2.7 – no third party access 9.5, A.2.1 – no POS POI terminals/devices in use
For any Not Tested responses, identify which sub-requirements were not tested and the reason.	

Section 2: Self-Assessment Questionnaire D for Service Providers

Self-assessment completion date:	2025-02-17
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 2024-11-20).

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>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 (<i>Service Provider Company Name</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>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 (<i>Service Provider Company Name</i>) has not demonstrated compliance with the PCI DSS requirements included in this SAQ.</p> <p>Target Date 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 <i>before completing Part 4</i>.</p>								
<input type="checkbox"/>	<p>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 (<i>Service Provider Company Name</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"> <thead> <tr> <th>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 4.0.1, 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



Signature of Service Provider Executive Officer ↑	Date: 2025-02-17
Service Provider Executive Officer Name: Elaine Gallacher	Title: Director

Part 3c. Qualified Security Assessor (QSA) Acknowledgement

If a QSA was involved or assisted with this assessment, indicate the role performed:	<input type="checkbox"/> QSA performed testing procedures.
	<input type="checkbox"/> QSA provided other assistance. If selected, describe all role(s) performed:

Signature of Lead QSA ↑	Date: YYYY-MM-DD
Lead QSA Name:	

Signature of Duly Authorized Officer of QSA Company ↑	Date: YYYY-MM-DD
Duly Authorized Officer Name:	QSA Company:

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

If an ISA(s) was involved or assisted with this assessment, indicate the role performed:	<input type="checkbox"/> ISA(s) performed testing procedures.
	<input type="checkbox"/> 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/.