

Service Description

Payment Card Industry Card Production

Compliance Validation Services

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Payment Card Industry Card Production Compliance Validation Service

SecureTrust™ is a division of Trustwave Holdings, Inc.

SERVICE DESCRIPTION

SecureTrust's Payment Card Industry Card Production (PCI CP) Compliance Validation Service (CVS) (the "**Service**") evaluates whether identified card production security operations and safeguards are compliant with the PCI CP logical or physical standards (the "**PCI CP standards**") at a given point in time.

Specifically, SecureTrust evaluates Client's policies, procedures, and practices through documentation review, interviews, discussions, controls analysis, and examination of Client's current physical or logical security architectures.

Capitalized terms used in this service description but not defined herein have the meaning given to them in the Trustwave Master Services Agreement found at <https://www.trustwave.com/en-us/legal-documents/contract-documents/> or a similar agreement signed between SecureTrust and Client.

BASE SERVICE FEATURES

The Service includes the following standard features:

SecureTrust Portal

The SecureTrust Portal features consist of, among others, a Compliance Manager application to manage the engagement process as well as collect and securely store evidence, documentation, and final deliverables.

Global Compliance and Risk Services

The Global Compliance and Risk Services (GCRS) team consists of, among others, the following key personnel and functions:

Card Production Security Assessor (CPSA) – A CPSA is the primary resource for the fulfillment of the Service, responsible for conducting the assessment, compliance determination and reporting.

Managing Consultant (MC) – An MC provides guidance, project oversight, and report quality assurance to the CPSA and serves as Client's secondary point of contact for escalations and queries.

Compliance Review Board (CRB) – The CRB serves as a final escalation point for interpreting the requirements of the PCI CP standards or resolving complicated compliance questions, providing consistency and continuity across SecureTrust assessments. The CRB is also the final point of escalation for issue resolution regarding compliance status against the requirements of the PCI CP standards or the review of a compensating control.

PCI CP CVS Assessment – SecureTrust assesses whether Client’s identified card production security operations and safeguards are compliant with the PCI CP standards. SecureTrust will provide Client with a PCI CP CVS assessment. If Client’s PCI CP environment is found compliant with the PCI CP standards, SecureTrust will provide a Report on Compliance (ROC) as a declaration of Client’s compliance status. If Client’s PCI CP environment is found non-compliant with the PCI CP standards, SecureTrust will provide a non-compliant report detailing the results of the PCI CP CVS Assessment.

DELIVERY AND IMPLEMENTATION

Project Initiation

The SecureTrust GCRS team is assigned to facilitate delivery of the Service which includes scheduling and conducting the remote kickoff meeting to define and agree to a high-level project plan consisting of milestone dates, key steps, estimates for duration, deliverables, resource requirements and escalation procedures.

The kickoff meeting also aims to verify the PCI CP functions to be assessed. The following PCI Card Production functions are defined by the PCI Security Standards Council (SSC):

- Card Production and Provisioning – Physical Security Requirements
- Card Production and Provisioning – Logical Security Requirements

Note that the Service may be for either, or both, standards as determined during scoping.

SecureTrust will request initial information documents and schedule future meetings. Client will provide a preliminary overview of Client’s PCI CP environment.

Phase I: Information Gathering

SecureTrust and Client will work to gather and analyze information on Client’s PCI CP environment. SecureTrust will conduct interviews, as required, with architects, developers, systems administrators, quality assurance (QA) testing personnel, and other Client personnel who may provide relevant details.

SecureTrust will examine applicable documentation and may request a remote demonstration of Client’s PCI CP environment function capabilities to maximize understanding of the card production and provisioning processes before conducting the Review and Testing phase of the Service.

Topics for information gathering may include, but are not limited to:

- Security policies and procedures
- Key management
- Network security
- Roles and responsibilities, including personnel assignments
- Data security
- System security
- User management and access control
- Personal Identification Number (PIN) distribution
- Physical design parameters
- Collection of samples
- Packaging and delivery
- PIN printing

Phase II: Review and Testing

SecureTrust will conduct documentation reviews, interviews, discussions, evidence reviews, facilities inspections, controls analysis and examination of Client's current security architecture.

The review and testing may take place onsite within Client's facilities. Some aspects of testing may be carried out remotely, as determined by SecureTrust.

SecureTrust will examine Client's PCI CP environment with regard to PCI CP physical and logical requirements applicable as of the start date.

Where third parties are used to support Client's PCI CP environment, SecureTrust will collect information about the services provided by and the relationships with such third parties.

SecureTrust will work with Client to determine the testing requirements for each area of the PCI CP functions. Testing activities may include:

- Examination of system configurations
- Interviews
- Observation of performed processes and procedures in accordance with documentation collected during the Information Gathering phase
- Physical inspection of facilities and equipment
- Review of third parties used to support Client's PCI CP environment.

When sampling is permitted by the PCI CP testing procedures, SecureTrust will utilize non-statistical sampling, also known as judgement sampling, to determine the population and the sample.

Compensating controls may be considered, at SecureTrust's sole discretion, when an entity cannot meet a PCI CP requirement explicitly as stated due to legitimate technical or documented business constraints if SecureTrust determines that the Client has sufficiently mitigated the risk associated with the requirement through implementation of other controls.

SecureTrust will work with Client to resolve Client's assessment questions. SecureTrust will also provide the Client reasonable assistance in Client's interpretation of the PCI CP standards and its responses. SecureTrust may request additional review of Client's PCI CP environment, documentation or data handling processes and procedures.

Phase III: Reporting

SecureTrust will develop a draft report documenting observations and recommendations from the Service.

The draft report will be sent to Client for review. Client may comment and suggest changes to the draft report and supporting documentation before SecureTrust's QA team finalizes the report. SecureTrust retains final authority regarding the contents of the final report and the type of final deliverable to be produced.

SecureTrust will provide a final deliverable, including the report and associated documentation, as defined below:

- If Client's PCI CP environment is found compliant with the PCI CP standards, and once finalized by SecureTrust's QA team, SecureTrust will provide Client with a compliant Report on Compliance (ROC) and complete an Attestation of Compliance (AOC) as a declaration of Client's compliance status.

- If Client's PCI CP environment is found non-compliant with the PCI CP standards, SecureTrust will provide Client with a non-compliant ROC.

SecureTrust will conduct a closeout meeting with Client.

SECURETRUST RESPONSIBILITIES

- Establish contact and remain available for communications from Client.
- Establish communication and escalation plans.
- Create a client account in the SecureTrust Portal.
- Define high-level project plan consisting of milestone dates, key steps, estimates for duration, deliverables, and resource requirements.
- Schedule and conduct kickoff, periodic status, and closeout meetings.
- Interview appropriate organization personnel and collect information from personnel.
- Validate the scope of the Service.
- Create and respond to Client action items in Compliance Manager within SecureTrust portal.
- Perform Service against the PCI CP testing requirements.
- Determine Service results and compliance status.
- Provide Client with information on observations that require remediation.
- Produce either a compliant or a non-compliant ROC, depending on the status of Client's PCI CP environment at the time the Service occurs.
- Deliver to Client a final report documenting observations and recommendations from the Service.
- Submit reporting documentation to applicable card brands.

CLIENT RESPONSIBILITIES & ACKNOWLEDGMENTS

- Establish contact and remain available for communications from SecureTrust.
- Establish communication and escalation plans.
- Agree to high-level project plan consisting of key steps, estimates for duration, deliverables, and resource requirements.
- Accurately provide all necessary information including key stakeholders, applicable Client environment information and configuration requirements.
- Inform SecureTrust of all Client environment maintenance activity and changes that may impact the Service.
- Accurately respond to requests from SecureTrust teams when establishing contact and collecting information.
- Provide complete and accurate details of the relevant environment and other business operations information.
- Make available resources capable of participating in the Service activities.
- Participate in and understand materials explained during calls, meetings, interviews, discussions, facilities inspection, and controls analysis.
- Client acknowledges:
 - All security and feature updates for SecureTrust Portal software will be included in major version release upgrades.
 - The Service refers the requirements and testing procedures of the current version of the PCI CP standards as applicable at the time of the Service start date.
 - The Service may consist of both onsite and remote assessment activities.

- SecureTrust may collect evidence provided by Client from applicable systems and processes, including system files, application files, database contents and images of test systems as required to prove compliance with any specific requirements. Client agrees to provide all such evidence in a timely manner.
- The Service will begin on the day of the kickoff call. The timeline and end of the Service will be determined during the kickoff call or the applicable statement of work.
- Documentation and evidence requested by SecureTrust must be submitted by Client within forty-five (45) days of the start of the Service.
 - Client must submit all evidence and complete remediation activities no later than forty-five (45) days prior to the end of the Service.
- The documentation review includes one initial review of Client documentation with direct feedback on any non-compliant observations, and one review of the Client remediated documentation.
- Lab preparations are the responsibility of Client. Client must provide the systems required for lab testing to ensure all applicable requirements can be tested, even if testing is conducted at the SecureTrust premises.
- All PCI CP services selected for a single SOW or Order Form must be for an identical term.
- SecureTrust is not responsible for defining systems in scope or whether information provided by Client is accurate.
- SecureTrust retains the right to reject or accept Client comments based on the facts and circumstances of the Service.
- The validation of a third-party provider's PCI CP compliance is not included in the Service.
- SecureTrust will perform the Service in the English language.
- SecureTrust will not create or modify Client documentation as part of the Service.
- SecureTrust will not provide remediation services as part of the Service.
- SecureTrust will not offer any legal guidance or counseling.
- The quality and accuracy of the Service is dependent on Client's provision of accurate information and access to Client systems and resources to SecureTrust.