



Payment Card Industry (PCI) Data Security Standard

UGTECH

Attestation of Compliance for Onsite Assessments – Service Providers

Version 3.2.1

June 2018



Section 1: Assessment Information

Instructions for Submission

This Attestation of Compliance must be completed as a declaration of the results of the service provider's assessment with the *Payment Card Industry Data Security Standard Requirements and Security Assessment Procedures (PCI DSS)*. Complete all sections: The service provider is responsible for ensuring that each section is completed by the relevant parties, as applicable. Contact the requesting payment brand for reporting and submission procedures.

Part 1. Service Provider and Qualified Security Assessor Information

Part 1a. Service Provider Organization Information

Company Name:	Alchemy GPS Europe UAB	DBA (doing business as):	Financial service		
Contact Name:	JOHN TAN KEE NERN	Title:	CEO		
Telephone:	+65 81821430	E-mail:	john@alchemypay.org		
Business Address:	Laisvės pr. 60, LT-05120 Vilnius Lithuania	City:	Vilnius		
State/Province:	Vilnius	Country:	Lithuania	Zip:	01047
URL:	https://alchemypay.org/				

Part 1b. Qualified Security Assessor Company Information (if applicable)

Company Name:	Beijing UGTECH Co., Ltd				
Lead QSA Contact Name:	Yurong Wang	Title:	QSA		
Telephone:	+86 18601920470	E-mail:	yurong@ugtech.com.cn		
Business Address:	Level 26, Fortune Financial Center, No.5 Dongsanhuanzhong Rd, Chaoyang District	City:	Beijing		
State/Province:	Beijing	Country:	China	Zip:	100020
URL:	https://www.ugtech.com.cn				

Part 2. Executive Summary

Part 2a. Scope Verification

Services that were INCLUDED in the scope of the PCI DSS Assessment (check all that apply):

Name of service(s) assessed: Alchemy Pay

Type of service(s) assessed:

Hosting Provider:

- Applications / software
- Hardware
- Infrastructure / Network
- Physical space (co-location)
- Storage
- Web
- Security services
- 3-D Secure Hosting Provider
- Shared Hosting Provider
- Other Hosting (specify):

Managed Services (specify):

- Systems security services
- IT support
- Physical security
- Terminal Management System
- Other services (specify):

Payment Processing:

- POS / 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 you feel these categories don't apply to your service, complete "Others." If you're unsure whether a category could apply to your service, consult with the applicable payment brand.

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 (check all that apply):

Name of service(s) not assessed: N/A

Type of service(s) not assessed:

<p>Hosting Provider:</p> <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 <input type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input type="checkbox"/> Shared Hosting Provider <input type="checkbox"/> Other Hosting (specify):	<p>Managed Services (specify):</p> <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):	<p>Payment Processing:</p> <input type="checkbox"/> POS / 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:

Part 2b. Description of Payment Card Business

Describe how and in what capacity your business stores, processes, and/or transmits cardholder data.

Alchemy GPS Europe UAB provides various payment saas services, such as authorization service, refund service, settlement service and reconciliation service.

Sensitive authentication data and cardholder data are securely transmitted over Internet within strong cryptographic HTTPS interface. Once internal payment processes are completed, cardholder data and sensitive data are transmitted to payment processors over Internet within strong cryptographic HTTPS interface. Cardholder data are stored in the local database servers for quick payment business purpose, and these stored cardholder data are protected via strong cryptography. Sensitive authentication data and purged immediately after authorization. No sensitive authentication data are stored in the cardholder data environment.

Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data.

We are just a SaaS platform that provides customers with technical services such as payment channel integration, payment optimization and fraud management, and does not involve any capital settlement business.

Part 2c. Locations

List types of facilities (for example, retail outlets, corporate offices, data centers, call centers, etc.) and a summary of locations included in the PCI DSS review.

Type of facility:	Number of facilities of this type	Location(s) of facility (city, country):
<i>Example: Retail outlets</i>	3	Boston, MA, USA
Corporate offices	1	Laisvės pr. 60, LT-05120 Vilnius Lithuania
Data centers	1	Datacenter network is located in Amazon datacenter

Part 2d. Payment Applications

Does the organization use one or more Payment Applications? Yes No

Provide the following information regarding the Payment Applications your organization uses:

Payment Application Name	Version Number	Application Vendor	Is application PA-DSS Listed?	PA-DSS Listing Expiry date (if applicable)
Alchemy Pay Gateway Platform	V 1.0	Alchemy Pay	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	

Part 2e. Description of 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).

The system components of the cardholder data environment are located in Amazon datacenter, Oregon State, United States of America. which mainly connect to merchants over HTTPS interface for payment transactions, and outbound traffics are transmitted over HTTPS interface to

<ul style="list-style-type: none"> • <i>Critical system components within the CDE, such as POS devices, databases, web servers, etc., and any other necessary payment components, as applicable.</i> 	payment processor. The critical system components involved in the cardholder data environment include application servers, database servers and log server.
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Does your business use network segmentation to affect the scope of your PCI DSS environment? <i>(Refer to "Network Segmentation" section of PCI DSS for guidance on network segmentation)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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Part 2f. Third-Party Service Providers

Does your company have a relationship with a Qualified Integrator & Reseller (QIR) for the purpose of the services being validated? Yes No

If Yes:

Name of QIR Company:	
QIR Individual Name:	
Description of services provided by QIR:	

Does your company have a relationship with one or more third-party service providers (for example, Qualified Integrator Resellers (QIR), gateways, payment processors, payment service providers (PSP), web-hosting companies, airline booking agents, loyalty program agents, etc.) for the purpose of the services being validated? Yes No

If Yes:

Name of service provider:	Description of services provided:
checkout.com	Payment authorization service
Payletter	Payment authorization service
mercuryo	Payment authorization service
Credorax	Payment authorization service
Unlimint	Payment authorization service

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

Part 2g. Summary of Requirements Tested

For each PCI DSS Requirement, select one of the following:

- **Full** – The requirement and all sub-requirements of that requirement were assessed, and no sub-requirements were marked as “Not Tested” or “Not Applicable” in the ROC.
- **Partial** – One or more sub-requirements of that requirement were marked as “Not Tested” or “Not Applicable” in the ROC.
- **None** – All sub-requirements of that requirement were marked as “Not Tested” and/or “Not Applicable” in the ROC.

For all requirements identified as either “Partial” or “None,” provide details in the “Justification for Approach” column, including:

- Details of specific sub-requirements that were marked as either “Not Tested” and/or “Not Applicable” in the ROC
- Reason why sub-requirement(s) were not tested or not applicable

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:		Alchemy Pay		
PCI DSS Requirement	Details of Requirements Assessed			Justification for Approach (Required for all “Partial” and “None” responses. Identify which sub-requirements were not tested and the reason.)
	Full	Partial	None	
Requirement 1:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Requirement 1.1.6 was marked as not applicable. Because insecure services and protocols are not enabled in the cardholder data environment.</p> <p>Requirement 1.2.2 was marked as not applicable. Because router devices are not implemented in the cardholder data environment.</p> <p>Requirement 1.2.3 was marked as not applicable. Because wireless networks are not enabled in the CDE nor could impact the security of the CDE.</p> <p>Requirement 1.3.6 was marked as not applicable. Because full PANS and sensitive authentic data are not stored in internal system components.</p>
Requirement 2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Requirement 2.1.1 is marked as not applicable. Because there is no wireless network used for iPasspay environment.</p> <p>Requirement 2.2.3 is marked as not applicable. Because there is no services, protocols or daemons is considered to be insecure.</p> <p>Requirement 2.6 is marked as not applicable. Because Alchemy is not a shared hosting provider.</p>

Requirement 3:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Requirements 3.2.a, 3.2.b were marked as not applicable. Because Alchemy was not an issuer or provide issuer servcie.</p> <p>Requirement 3.4. 1 was marked as not applicable. Because disk level encryption mechanisms are not engaged for the cardholder data protection.</p> <p>Requirements 3.5, 3.5.2, 3.5.3, 3.5.4, 3.6, 3.6.1, 3.6.2, 3.6.3, 3.6.4, 3.6.5, 3.6.6, 3.6.7 and 3.6.8 were marked as not applicable. Because full PANs and sensitive authentication data are not stored in the cardholder data environment and thus encryption keys are not used to protect cardholder data.</p>
Requirement 4:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Requirement 4.1.1 was marked as not applicable. Because wireless networks are not enabled in the CDE nor could impact the security of the CDE.</p> <p>Requirement 4.2.a was marked as not applicable. Because PANs are not transmitted via end-user messaging technologies.</p>
Requirement 5:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Requirement 5.1 was marked as not applicable. Because Linux servers were evaluated as not commonly affected by malicious software.
Requirement 6:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All requirements in this section were marked as applicable.
Requirement 7:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All requirements in this section were marked as applicable.
Requirement 8:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Requirement 8.1.5 was marked as not applicable. Because vendor accounts are not enabled in the cardholder data environment</p> <p>Requirement 8.5.1 was marked as not applicable Because Alchemy has not remote access to its customer premises.</p> <p>Requirement 8.7 was marked as not applicable. Because full PANs and sensitive authentication data are not stored in database servers.</p>
Requirement 9:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Requirements 9.5, 9.5.1, 9.6, 9.6.1, 9.6.2, 9.6.3, 9.7, 9.7.1, 9.8, 9.8.1 and 9.8.2 were marked as not applicable. Because media is not engaged in the storage of cardholder data.
Requirement 10:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Requirement 10.2.1 was marked as not applicable. Because sensitive authentication data and full PANs are not accessible.

Requirement 11:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All requirements in this section were marked as applicable.
Requirement 12:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All requirements in this section were marked as applicable.
Appendix A1:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	All requirements were marked as not applicable. Because Alchemy is not a shared service provider.
Appendix A2:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	All requirements were marked as not applicable. Because SSL and earlier TLS are not used by Alchemy.

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Section 2: Report on Compliance

This Attestation of Compliance reflects the results of an onsite assessment, which is documented in an accompanying Report on Compliance (ROC).

The assessment documented in this attestation and in the ROC was completed on:	August 4, 2022
Have compensating controls been used to meet any requirement in the ROC?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were any requirements in the ROC identified as being not applicable (N/A)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any requirements not tested?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were any requirements in the ROC unable to be met due to a legal constraint?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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Section 3: Validation and Attestation Details

Part 3. PCI DSS Validation

This AOC is based on results noted in the ROC dated August 4, 2022.

Based on the results documented in the ROC noted above, the signatories identified in Parts 3b-3d, as applicable, assert(s) the following compliance status for the entity identified in Part 2 of this document (**check one**):

<input checked="" type="checkbox"/>	<p>Compliant: All sections of the PCI DSS ROC are complete, all questions answered affirmatively, resulting in an overall COMPLIANT rating; thereby Alchemy GPS Europe UAB has demonstrated full compliance with the PCI DSS.</p>						
<input type="checkbox"/>	<p>Non-Compliant: Not all sections of the PCI DSS ROC are complete, or not all questions are answered affirmatively, resulting in an overall NON-COMPLIANT rating, thereby <i>(Service Provider Company Name)</i> has not demonstrated full compliance with the PCI DSS.</p> <p>Target Date for Compliance:</p> <p>An entity submitting this form with a status of Non-Compliant may be required to complete the Action Plan in Part 4 of this document. <i>Check with the payment brand(s) before completing Part 4.</i></p>						
<input type="checkbox"/>	<p>Compliant but with Legal exception: One or more requirements are marked “Not in Place” due to a legal restriction that prevents the requirement from being met. This option requires additional review from acquirer or payment brand.</p> <p><i>If checked, complete the following:</i></p> <table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 35%;">Affected Requirement</th> <th>Details of how legal constraint prevents requirement being met</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Affected Requirement	Details of how legal constraint prevents requirement being met				
Affected Requirement	Details of how legal constraint prevents requirement being met						

Part 3a. Acknowledgement of Status

Signatory(s) confirms:

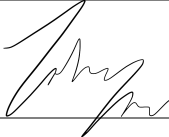
(Check all that apply)

<input checked="" type="checkbox"/>	The ROC was completed according to the <i>PCI DSS Requirements and Security Assessment Procedures</i> , Version 3.2.1, 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 my assessment in all material respects.
<input checked="" type="checkbox"/>	I have confirmed with my payment application vendor that my payment system does not store sensitive authentication data after authorization.
<input checked="" type="checkbox"/>	I have read the PCI DSS and I recognize that I must maintain PCI DSS compliance, as applicable to my environment, at all times.
<input checked="" type="checkbox"/>	If my environment changes, I recognize I must reassess my environment and implement any additional PCI DSS requirements that apply.

Part 3a. Acknowledgement of Status (continued)

- No evidence of full track data¹, CAV2, CVC2, CID, or CVV2 data², or PIN data³ storage after transaction authorization was found on ANY system reviewed during this assessment.
- ASV scans are being completed by the PCI SSC Approved Scanning Vendor UGTech.

Part 3b. Service Provider Attestation



<i>Signature of Service Provider Executive Officer</i> ↑	<i>Date:</i> August 4, 2022
<i>Service Provider Executive Officer Name:</i> John	<i>Title:</i> Information security manager

Part 3c. Qualified Security Assessor (QSA) Acknowledgement (if applicable)

If a QSA was involved or assisted with this assessment, describe the role performed:	Verify the PCI DSS scope and perform remote inter-active assessment.
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<i>Signature of Duly Authorized Officer of QSA Company</i> ↑	<i>Date:</i> August 4, 2022
<i>Duly Authorized Officer Name:</i> Lion Huang	<i>QSA Company:</i> Beijing UGTech Co., Ltd

Part 3d. Internal Security Assessor (ISA) Involvement (if applicable)

If an ISA(s) was involved or assisted with this assessment, identify the ISA personnel and describe the role performed:	Not applicable.
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¹ Data encoded in the magnetic stripe or equivalent data on a chip used for authorization during a card-present transaction. Entities may not retain full track data after transaction authorization. The only elements of track data that may be retained are primary account number (PAN), expiration date, and cardholder name.

² The three- or four-digit value printed by the signature panel or on the face of a payment card used to verify card-not-present transactions.

³ Personal identification number entered by cardholder during a card-present transaction, and/or encrypted PIN block present within the transaction message.

Part 4. Action Plan for Non-Compliant Requirements

Select the appropriate response for “Compliant to PCI DSS Requirements” for each requirement. If you answer “No” to any of the requirements, you may be required to provide the date your Company expects to be compliant with the requirement and a brief description of the actions being taken to meet the requirement.

Check with the applicable payment brand(s) before completing Part 4.

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 a firewall configuration to protect cardholder data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2	Do not use vendor-supplied defaults for system passwords and other security parameters	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3	Protect stored cardholder data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4	Encrypt transmission of cardholder data across open, public networks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5	Protect all systems against malware and regularly update anti-virus software or programs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6	Develop and maintain secure systems and applications	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7	Restrict access to cardholder data by business need to know	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8	Identify 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	Track and monitor all access to network resources and cardholder data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11	Regularly test security systems and processes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12	Maintain a policy that addresses information security for all personnel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Appendix A1	Additional PCI DSS Requirements for Shared Hosting 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"/>	

