



# **Payment Card Industry (PCI) Data Security Standard**

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## **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:	DeepThink LLC	DBA (doing business as):	ThinkReservations		
Contact Name:	Alfred Aday	Title:	CTO		
Telephone:	(877) 736-4195 ext.701	E-mail:	alfred.aday@thinkreservations.com		
Business Address:	1700 7th Avenue, Suite 116 PMB 173	City:	Seattle		
State/Province:	WA	Country:	USA	Zip:	98101
URL:	https://www.thinkreservations.com				

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

Company Name:	SecurityMetrics				
Lead QSA Contact Name:	Mike Riesen	Title:	QSA		
Telephone:	(801) 705-5652	E-mail:	aoc@securitymetrics.com		
Business Address:	1275 West 1600 North	City:	Orem		
State/Province:	Utah	Country:	USA	Zip:	84057
URL:	www.securitymetrics.com				

## 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: ThinkReservations

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:	None	
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 <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):	<b>Managed Services (specify):</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"/> 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): None		
Provide a brief explanation why any checked services were not included in the assessment:	None	

**Part 2b. Description of Payment Card Business**

Describe how and in what capacity your business stores, processes, and/or transmits cardholder data.	DeepThink, LLC (DBA and referred to hereafter as ThinkReservations) is an Internet Service provider headquartered in Seattle, WA. ThinkReservations provides a property management system, booking engine, and channel manager for the lodging industry.
Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data.	None

**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
There are no physical locations within the scope of the assessment. The Think Reservations CDE is hosted within AWS. The assessment was conducted at the	1	Seattle, WA, USA

Makers workspace, a coworking center in Seattle, WA.		
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**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)
			<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	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	

**Part 2e. Description of Environment**

<p>Provide a <b>high-level</b> description of the environment covered by this assessment.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> <li>• <i>Connections into and out of the cardholder data environment (CDE).</i></li> <li>• <i>Critical system components within the CDE, such as POS devices, databases, web servers, etc., and any other necessary payment components, as applicable.</i></li> </ul>	<p>ThinkReservations provides an HTTPS-secured property management system and booking engine that includes a payment page for customers to enter their payment card information. The payment page is hosted on the Amazon Web Services (AWS) cloud infrastructure. ThinkReservations uses its api.thinksecurepayments.com API to pass cardholder data to Braintree Payments, Authorize.net, and Heartland Payment Systems for payment processing.</p>
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<p>Does your business use network segmentation to affect the scope of your PCI DSS environment?</p> <p><i>(Refer to “Network Segmentation” section of PCI DSS for guidance on network segmentation)</i></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
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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: Not Applicable

QIR Individual Name: Not Applicable

Description of services provided by QIR: Not Applicable

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:
Braintree Payments	Payment processing
Authorize.net	Payment processing
Heartland Payment Systems	Payment processing

**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:		ThinkReservations		
PCI DSS Requirement	Details of Requirements Assessed			
	Full	Partial	None	Justification for Approach (Required for all “Partial” and “None” responses. Identify which sub-requirements were not tested and the reason.)
Requirement 1:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>1.2.2 N/A – No routers exist in the CDE.</b> <b>1.2.3 N/A – No wireless networks are present in, or connected to, the Think Reservations CDE</b>
Requirement 2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>2.2.3 N/A – No insecure services, daemons or protocols are enabled.</b> <b>2.6 N/A – The assessor interviewed Int-1 to verify that ThinkReservations is not a shared hosting provider.</b>
Requirement 3:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 4:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>4.1.1 N/A – No wireless networks are present in, or connected to, the Think Reservations CDE</b>
Requirement 5:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 6:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 7:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 8:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>8.1.3 N/A – No users with access to ThinkReservations CDE systems have been terminated in the past six months.</b> <b>8.1.4 N/A – No inactive user accounts for systems within the ThinkReservations CDE exist.</b> <b>8.5.1 N/A – ThinkReservations does not control access to any third-party or customer systems.</b>

Requirement 9:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p><b>9.5.1 N/A –No media containing cardholder data is distributed outside of the CDE.</b></p> <p><b>9.6 - 9.8.2 N/A – No media containing cardholder data is distributed outside of the CDE.</b></p> <p><b>9.9 - 9.9.3 N/A – ThinkReservations does not use any POI POS devices.</b></p>
Requirement 10:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 11:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>11.2.1 N/A – No less secure internal network to scan from exists.</b>
Requirement 12:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>12.8 N/A – ThinkReservations Does not share cardholder data with any service provider.</b>
Appendix A1:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Appendix A2:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



## Section 2: Report on Compliance

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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:	9/5/19	
Have compensating controls been used to meet any requirement in the ROC?	<input checked="" type="checkbox"/> Yes	<input 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

## Section 3: Validation and Attestation Details

### Part 3. PCI DSS Validation

This AOC is based on results noted in the ROC dated 9/5/19.

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><b>Compliant:</b> All sections of the PCI DSS ROC are complete, all questions answered affirmatively, resulting in an overall <b>COMPLIANT</b> rating; thereby Deepthink LLC has demonstrated full compliance with the PCI DSS.</p>						
<input type="checkbox"/>	<p><b>Non-Compliant:</b> Not all sections of the PCI DSS ROC are complete, or not all questions are answered affirmatively, resulting in an overall <b>NON-COMPLIANT</b> rating, thereby (<i>Service Provider Company Name</i>) has not demonstrated full compliance with the PCI DSS.</p> <p><b>Target Date</b> 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><b>Compliant but with Legal exception:</b> 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:

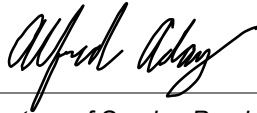
(**Check all that apply**)

<input checked="" type="checkbox"/>	The ROC was completed according to the <i>PCI DSS Requirements and Security Assessment Procedures, Version 3.2.1</i> , 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 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)**

<input checked="" type="checkbox"/>	No evidence of full track data <sup>1</sup> , CAV2, CVC2, CID, or CVV2 data <sup>2</sup> , or PIN data <sup>3</sup> storage after transaction authorization was found on ANY system reviewed during this assessment.
<input checked="" type="checkbox"/>	ASV scans are being completed by the PCI SSC Approved Scanning Vendor SecurityMetrics (ASV certificate # 3707-01-14)

**Part 3b. Service Provider Attestation**



Signature of Service Provider Executive Officer ↑	Date: 9/9/2019
Service Provider Executive Officer Name: <b>Alfred Aday</b>	Title: <b>CTO</b>

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

If a QSA was involved or assisted with this assessment, describe the role performed:	<i>PCI DSS assessment</i>
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Signature of Duly Authorized Officer of QSA Company ↑	Date: 9/9/2019
Duly Authorized Officer Name: <b>Mike Riesen</b>	QSA Company: SecurityMetrics

**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:	<i>Not Applicable</i>
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<sup>1</sup> 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.

<sup>2</sup> 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.

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

