

Payment Card Industry Data Security Standard

Attestation of Compliance for Report on Compliance – Service Providers

Version 4.0

Revision 2

Publication Date: August 2023



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

Entity Name: eSentire

Assessment End Date: July 10, 2024

Date of Report as noted in the Report on Compliance: July 12, 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		
Part 1a. Assessed Entity (ROC Section 1.1)		
Company name:	eSentire	
DBA (doing business as):	N/A	
Company mailing address:	451 Phillip St	
	Waterloo, ON Canada N2L 3X2	
Company main website:	www.esentire.com	
Company contact name:	Michael Parker	
Company contact title:	Director, Governance, Risk & Compliance	
Contact phone number:	519-651-2200	
Contact e-mail address:	Michael.Parker@esentire.com	
Part 1b. Assessor		

(ROC Section 1.1)

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:	MNP LLP	
Company mailing address:	255 Longside Dr, Suite 102	
	Mississauga, ON Canada L5W 0G7	
Company website:	www.mnp.ca	
Lead Assessor name:	Melanie Dodson	



Assessor phone number:	905-607-9777		
Assessor e-mail address:	Melanie.Dodson@mnp.ca		
Assessor certificate number:	QSA # 205-172		
Part 2. Executive Summary			
Part 2a. Scope Verification			
Services that were <u>INCLUDED</u> in th	e scope of the Assessment (select a	ıll that apply):	
Name of service(s) assessed:	Network, Endpoint, Log, Cloud		
Type of service(s) assessed:			
Hosting Provider:	Managed Services:	Payment Processing:	
☐ Applications / software	⊠ Systems security services	☐ POI / card present	
☐ Hardware	☐ IT support	☐ Internet / e-commerce	
☐ Infrastructure / Network	☐ Physical security	☐ MOTO / Call Center	
☐ Physical space (co-location)	☐ Terminal Management System	□ ATM	
☐ Storage	☐ Other services (specify):	☐ Other processing (specify):	
☐ Web-hosting services			
☐ Security services			
\square 3-D Secure Hosting Provider			
☐ Multi-Tenant Service Provider			
☐ Other Hosting (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			
service description. If these categories	for assistance only and are not intende s do not apply to the assessed service, assessed service, consult with the ent	complete "Others." If it is not clear	

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 Assessment (select all that apply): Name of service(s) not assessed: Cyber forensics and response investigation, LogSentry, AXI Type of service(s) not assessed: **Hosting Provider:** Managed Services: **Payment Processing:** ☐ Applications / software ☐ Systems security services ☐ POI / card present ☐ Hardware ☐ IT support ☐ Internet / e-commerce ☐ MOTO / Call Center ☐ Infrastructure / Network ☐ Physical security ☐ Physical space (co-location) ☐ Terminal Management System \square ATM □ Storage ☐ Other services (specify): ☐ Other processing (specify): ☐ Web-hosting services ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Multi-Tenant Service Provider ☐ Other Hosting (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 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 eSentire, as a managed service provider, does not store, process, or transmit cardholder data as part of its transmits account data. business. Describe how the business is otherwise involved in or eSentire, as a managed service provider, does not store, process, or transmit cardholder data as part of its has the ability to impact the security of its customers' business. eSentire products (Network, Log, Endpoint account data. and Cloud) can be used to help a customer achieve compliance with specific PCI controls.



eSentire sensors (Network) are deployed within customer's environments and therefore may impact the security of the cardholder data environment. All access to the sensors is recorded. The sensor scrubs cardholder data from the Packet Capture (PCAP) files prior to transmission into the eSentire network.

To ensure there is no clear text cardholder data in the environment, the eSentire Log and Cloud managed solutions mask (with the pound symbol) all potential PAN at the time of the log ingestion and prior to persisting the data.

The Endpoint solution uses 3rd party platforms (ex: CrowdStrike) to access the endpoints for investigative purposes.

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

eSentire, as a managed service provider, does not store, process, or transmit cardholder data as part of its business. eSentire products (Network, Log, Endpoint and Cloud) can be used to help a customer achieve compliance with specific PCI controls.

eSentire sensors (Network) are deployed within customer's environments and therefore may impact the security of the cardholder data environment. All access to the sensors is recorded. The sensor scrubs cardholder data from the Packet Capture (PCAP) files prior to transmission into the eSentire network.

To ensure there is no clear text cardholder data in the environment, the eSentire Log and Cloud managed solutions mask (with the pound symbol) all potential PAN at the time of the log ingestion and prior to persisting the data.

The Endpoint solution uses 3rd party platforms (ex: CrowdStrike) to access the endpoints for investigative purposes.

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.

Not applicable. - The entity does not store, process, or transmit cardholder data, therefore there is no cardholder data environment (CDE) in the scope of this assessment.



System components that could impact the security of account data.			
Indicate whether the environment includes segmentation to reduce the scope of the Assessment.		□ Yes	⊠ No
(Refer to the "Segmentation" section of PCI DSS for guidance of	n segmentation)		

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)
Example: Data centers	3	Boston, MA, USA
Corporate Office	1	Waterloo, ON, Canada
Satellite Office/SOC	1	Cork, Ireland



Part 2. Executive Summary (continued)

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 SSCvalidated 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)—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:

that:					
Store, process, or transmit account data of gateways, payment processors, payment	☐ Yes ⊠ No				
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 laaS, PaaS, SaaS, and FaaS cloud providers)					
Could impact the security of the entity's C remote access, and/or bespoke software	☐ Yes ☒ No				
If Yes:					
Name of Service Provider:	Description of Services Provided:				
Amazon	Cloud service provider				
Microsoft Azure Azure: Cloud service provider, auth services, Defender (End Sentinel (Log), Intune		fender (Endpoint),			
VMWare	Carbon Black (Endpoint)				
SumoLogic	SumoLogic (Log)				
SentinelOne	SentinelOne (Endpoint)				
CrowdStrike	CrowdStrike (Endpoint)				

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



Part 2. Executive Summary (continued)

Part 2g. Summary of Assessment (ROC Section 1.8.1)

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: eSentire services assessed as part of this validation include: Network / Log / Cloud / Endpoint

PCI DSS	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		
Requirement	In Place	Not Applicable	Not Tested	Not in Place	Customized Approach	Compensating Controls
Requirement 1:	×	\boxtimes				
Requirement 2:	×	\boxtimes				
Requirement 3:		\boxtimes				
Requirement 4:		\boxtimes				
Requirement 5:	\boxtimes	\boxtimes				
Requirement 6:	\boxtimes	\boxtimes				\boxtimes
Requirement 7:	×	\boxtimes				
Requirement 8:	\boxtimes	\boxtimes				\boxtimes
Requirement 9:		\boxtimes				
Requirement 10:	\boxtimes	\boxtimes				
Requirement 11:	×	\boxtimes				
Requirement 12:	×	×				
Appendix A1:		\boxtimes				
Appendix A2:						
Appendix A2: Justification for						



- 1.2.4 No account data flow across the systems or network.
- 1.2.6 No insecure services on NSCs.
- 1.3.3 Wireless Network is not present.
- 1.4.4 The entity does not store cardholder data.
- 2.2.5 No insecure services on system components.
- 2.3.1 Wireless Network is not present.
- 2.3.2 Wireless Network is not present.
- Req. 3 The entity does not store, process, or transmit cardholder data.
- Req. 4 The entity does not store, process, or transmit cardholder data.
- 5.2.3.1 This requirement is a best practice until 31 March 2025.
- 5.3.2.1 This requirement is a best practice until 31 March 2025.
- 5.4.1 This requirement is a best practice until 31 March 2025.
- 6.3.2 This requirement is a best practice until 31 March 2025.
- 6.4.1 This requirement is a best practice until 31 March 2025.
- 6.4.2 This requirement is a best practice until 31 March 2025.
- 6.4.3 This requirement is a best practice until 31 March 2025.
- 6.5.2 No significant changes occurred within the assessment year.
- 6.5.5 The entity does not process PANs in their environment.
- 6.5.6 The entity does not process test data in the environment.
- 7.2.5 This requirement is a best practice until 31 March 2025.
- 7.2.5.1 This requirement is a best practice until 31 March 2025.
- 7.2.6 The entity is not storing cardholder data.
- 8.2.7 No third-party login to eSentire's network.
- 8.3.6 This requirement is a best practice until 31 March 2025.

For any Not Applicable responses, identify which subrequirements were not applicable and the reason.



- 8.3.10 This requirement is a best practice until 31 March 2025.
- 8.3.10.1 This requirement is a best practice until 31 March 2025.
- 8.3.11 The entity does not use any type of logical access tokens, smart cards, or certificates.
- 8.4.2 The entity does not have a CDE.
- 8.6.1 This requirement is a best practice until 31 March 2025.
- 8.6.2 This requirement is a best practice until 31 March 2025.
- 8.6.3 This requirement is a best practice until 31 March 2025.
- Req. 9 The entity does not store, process, or transmit cardholder data.
- 10.2.1.1 The entity does not store, process, or transmit cardholder data.
- 10.3.4 logs are sent to SumoLogic and Azure Sentinel for storage.
- 10.4.2.1 This requirement is a best practice until 31 March 2025.
- 10.7.2 This requirement is a best practice until 31 March 2025.
- 11.2.1 The entity's environment is hosted in AWS.
- 11.2.2 The entity's environment is hosted in AWS.
- 11.3.1.1 This requirement is a best practice until 31 March 2025.
- 11.3.1.2 This requirement is a best practice until 31 March 2025.
- 11.3.1.3 No significant changes to the environment during the assessment year.
- 11.3.2.1 No significant changes to the environment during the assessment year.
- 11.4.4 No critical or high exploitable vulnerabilities found in Penetration testing.
- 11.4.5 The entity does not store, process, or transmit Cardholder Data (CHD). Therefore, the entity does not have a Cardholder Data Environment (CDE).
- 11.4.6 The entity does not store, process, or transmit Cardholder Data (CHD). Therefore, the entity does not have a Cardholder Data Environment (CDE).



	11.4.7 - This requirement is a best practice until 31 March 2025.
	11.5.1.1 - This requirement is a best practice until 31 March 2025.
	11.6.1 - This requirement is a best practice until 31 March 2025.
	12.3.1 - This requirement is a best practice until 31 March 2025.
	12.3.2 - This requirement is a best practice until 31 March 2025.
	12.3.3 - This requirement is a best practice until 31 March 2025.
	12.3.4 - This requirement is a best practice until 31 March 2025.
	12.5.2.1 - This requirement is a best practice until 31 March 2025.
	12.5.3 - This requirement is a best practice until 31 March 2025.
	12.6.2 - This requirement is a best practice until 31 March 2025.
	12.6.3.2 - This requirement is a best practice until 31 March 2025.
	12.8.1 - Account data is not shared with any TPSP.
	12.8.2 - Account data is not shared with any TPSP.
	12.10.4.1 - This requirement is a best practice until 31 March 2025.
	12.10.7 - This requirement is a best practice until 31 March 2025.
	Appendix A1 - eSentire is not a Multi-Tenant Service Provider.
	Appendix A2 - eSentire does not have a card-present channel.
	Appendix A3 - eSentire is not a Designated Entities Supplemental Validation (DESV).
For any Not Tested responses, identify which sub- requirements were not tested and the reason.	



Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3.2)

Date Assessment began: Note: This is the first date that evidence was g	April 8, 2024		
Date Assessment ended: Note: This is the last date that evidence was g	July 10, 2024		
Were any requirements in the ROC unable to be	pe met due to a legal	constraint?	☐ Yes ☒ No
Were any testing activities performed remotely? If yes, for each testing activity below, indicate whether remote assessment activities were performed:			⊠ Yes □ No
Examine documentation	⊠ Yes	□ No	
Interview personnel	⊠ Yes	□ No	
Examine/observe live data	⊠ Yes	□ No	
Observe process being performed	⊠ Yes	□ No	
Observe physical environment	☐ Yes	⊠ No	
Interactive testing	⊠ Yes	□ No	
Other:	□ Yes	□ 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	l (Date of Report as noted in the ROC July 12
2024).	

Indicate be	elow whether a full or partial PCI	DSS assessment was completed:		
	sessment – All requirements hated in the ROC.	eve been assessed and therefore no requirements were marked as		
		uirements have not been assessed and were therefore marked as not assessed is noted as Not Tested in Part 2g above.		
	assert(s) the following complian	OC noted above, each signatory identified in any of Parts 3b-3d, as note status for the entity identified in Part 2 of this document		
×	marked as being either In Place	PCI DSS ROC are complete, and all assessed requirements are e or Not Applicable, resulting in an overall COMPLIANT rating; rated compliance with all PCI DSS requirements except those		
	Non-Compliant: 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 NON-COMPLIANT rating; thereby eSentire has not demonstrated compliance with PCI DSS requirements.			
	Target Date for Compliance: 2024-07-11			
		with a Non-Compliant status may be required to complete the Action . Confirm with the entity to which this AOC will be submitted before		
	marked as Not in Place due to and all other assessed requirer resulting in an overall COMPLI	ception: One or more assessed requirements in the ROC are a legal restriction that prevents the requirement from being met ments are marked as being either In Place or Not Applicable, ANT BUT WITH LEGAL EXCEPTION rating; thereby eSentire has all PCI DSS requirements except those noted as Not Tested to a legal restriction.		
	This option requires additional	review from the entity to which this AOC will be submitted.		
	If selected, complete the follow	ring:		
	Affected Requirement	Details of how legal constraint prevents requirement from being met		



Part 3. PCI DSS Validation (continued) Part 3a. Service Provider Acknowledgement Signatory(s) confirms: (Select all that apply) The ROC was completed according to PCI DSS, Version 4.0 and was completed according to the instructions therein. \boxtimes All information within the above-referenced ROC and in this attestation fairly represents the results of the Assessment in all material respects. PCI DSS controls will be maintained at all times, as applicable to the entity's environment. \boxtimes Part 3b. Service Provider Attestation Michael Parker Signature of Service Provider Executive Officer 1 Date: July 12, 2024 Service Provider Executive Officer Name: Michael Parker Title: Director, Governance, Risk & Compliance Part 3c. Qualified Security Assessor (QSA) Acknowledgement If a QSA was involved or assisted with this ☑ QSA performed testing procedures. Assessment, indicate the role performed: ☐ QSA provided other assistance. If selected, describe all role(s) performed: Signature of Lead QSA 1 Date: July 12, 2024 Lead QSA Name: Melanie Dodson Non BA Signature of Duly Authorized Officer of QSA Company 1 Date: July 12, 2024 Duly Authorized Officer Name: Tom Beaupre QSA Company: MNP LLP Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement If an ISA(s) was involved or assisted with this ☐ ISA(s) performed testing procedures. Assessment, indicate the role performed: \square 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
		YES	NO	Requirement)
1	Install and maintain network security controls			
2	Apply secure configurations to all system components			
3	Protect stored account data			
4	Protect cardholder data with strong cryptography during transmission over open, public networks			
5	Protect all systems and networks from malicious software			
6	Develop and maintain secure systems and software			
7	Restrict access to system components and cardholder data by business need to know			
8	Identify users and authenticate access to system components			
9	Restrict physical access to cardholder data			
10	Log and monitor all access to system components and cardholder data			
11	Test security systems and networks regularly			
12	Support information security with organizational policies and programs			
Appendix A1	Additional PCI DSS Requirements for Multi- Tenant Service Providers			
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card- Present POS POI Terminal Connections			











