



# Payment Card Industry Data Security Standard

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## **Self-Assessment Questionnaire P2PE and Attestation of Compliance**

**For use with PCI DSS Version 4.0.1**

Publication Date: October 2024

## Document Changes

Date	PCI DSS Version	SAQ Revision	Description
N/A	1.0		Not used.
May 2012	2.0		To create SAQ P2PE-HW for merchants using only hardware terminals as part of a validated P2PE solution listed by PCI SSC. This SAQ is for use with PCI DSS v2.0.
February 2014	3.0		To align content with PCI DSS v3.0 requirements and testing procedures and incorporate additional response options.
April 2015	3.1		Updated to align with PCI DSS v3.1. For details of PCI DSS changes, see <i>PCI DSS – Summary of Changes from PCI DSS Version 3.0 to 3.1</i> . Removed “HW” from SAQ title, as may be used by merchants using either a HW/HW or HW/Hybrid P2PE solution.
July 2015	3.1	1.1	Updated to remove references to “best practices” prior to June 30, 2015.
April 2016	3.2	1.0	Updated to align with PCI DSS v3.2. For details of PCI DSS changes, see <i>PCI DSS – Summary of Changes from PCI DSS Version 3.1 to 3.2</i> . Removed PCI DSS Requirements 3.3 and 4.2, as covered in implementation of PCI P2PE solution and PIM.
January 2017	3.2	1.1	Updated Document Changes to clarify requirements removed in the April 2016 update.
June 2018	3.2.1	1.0	Updated to align with PCI DSS v3.2.1. For details of PCI DSS changes, see <i>PCI DSS – Summary of Changes from PCI DSS Version 3.2 to 3.2.1</i> .
April 2022	4.0		Updated to align with PCI DSS v4.0. For details of PCI DSS changes, see <i>Summary of Changes from PCI DSS Version 3.2.1 to 4.0</i> . Rearranged, retitled, and expanded information in the “Completing the Self-Assessment Questionnaire” section (previously titled “Before You Begin”). Aligned content in Sections 1 and 3 of Attestation of Compliance (AOC) with PCI DSS v4.0 Report on Compliance AOC. Added PCI DSS v4.0 requirements. Added appendices for new reporting responses.
December 2022	4.0	1	Removed “In Place with Remediation” as a reporting option from Requirement Responses table, Attestation of Compliance (AOC) Part 2g, SAQ Section 2 Response column, and AOC Section 3. Also removed former Appendix C. Added “In Place with CCW” to AOC Section 3. Added guidance for responding to future-dated requirements. Added minor clarifications and addressed typographical errors.
October 2024	4.0.1		Updated to align with PCI DSS v4.0.1. For details of PCI DSS changes, see <i>PCI DSS Summary of Changes from PCI DSS Version 4.0 to 4.0.1</i> . Added ASV Resource Guide to section “Additional PCI SSC Resources.”

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## Completing the Self-Assessment Questionnaire

### Merchant Eligibility Criteria for Self-Assessment Questionnaire P2PE

Self-Assessment Questionnaire for Point-to-Point Encryption (SAQ P2PE) includes only those PCI DSS requirements applicable to merchants that process account data only via a validated<sup>\*</sup> PCI-listed P2PE solution. SAQ P2PE merchants do not have access to clear-text account data on any computer system, and only enter account data via payment terminals from a validated<sup>\*</sup> PCI-listed P2PE solution.

SAQ P2PE merchants may be either brick-and-mortar (card-present) or mail/telephone-order (card-not-present) merchants. For example, a mail/telephone-order merchant could be eligible for SAQ P2PE if they receive account data on paper or over a telephone, and key it directly and only into payment terminal from a validated<sup>\*</sup> PCI-listed P2PE solution.

***This SAQ is not applicable to e-commerce channels.***

***This SAQ is not applicable to service providers.***

SAQ P2PE merchants confirm that, for this payment channel:

- All payment processing is via a validated<sup>\*</sup> PCI-listed P2PE solution;
- The only systems in the merchant environment that store, process or transmit account data are the payment terminals from a validated<sup>\*</sup> PCI-listed P2PE solution;
- The merchant does not otherwise receive, transmit, or store account data electronically.
- Any account data the merchant might retain is on paper (for example, printed reports or receipts), and these documents are not received electronically; and
- The merchant has implemented all controls in the *P2PE Instruction Manual (PIM)* provided by the P2PE Solution Provider.

This SAQ includes only those requirements that apply to a specific type of merchant environment, as defined in the above eligibility criteria. If there are PCI DSS requirements applicable to the cardholder data environment that are not covered in this SAQ, it may be an indication that this SAQ is not suitable for the merchant's environment.

<sup>\*</sup> P2PE solutions on the PCI list of Point-to-Point Solutions with Expired Validations are no longer considered "validated" per the P2PE Program Guide. A merchant using an expired P2PE solution should check with its acquirer or individual payment brands about acceptability of this SAQ.

## Defining Account Data, Cardholder Data, and Sensitive Authentication Data

PCI DSS is intended for all entities that store, process, or transmit cardholder data (CHD) and/or sensitive authentication data (SAD) or could impact the security of cardholder data and/or sensitive authentication data. Cardholder data and sensitive authentication data are considered account data and are defined as follows:

Account Data	
Cardholder Data includes:	Sensitive Authentication Data includes:
<ul style="list-style-type: none"> <li>• Primary Account Number (PAN)</li> <li>• Cardholder Name</li> <li>• Expiration Date</li> <li>• Service Code</li> </ul>	<ul style="list-style-type: none"> <li>• Full track data (magnetic-stripe data or equivalent on a chip)</li> <li>• Card verification code</li> <li>• PINs/PIN blocks</li> </ul>

Refer to PCI DSS Section 2, *PCI DSS Applicability Information*, for further details.

## PCI DSS Self-Assessment Completion Steps

1. Confirm by review of the eligibility criteria in this SAQ and the *Self-Assessment Questionnaire Instructions and Guidelines* document on the PCI SSC website that this is the correct SAQ for the merchant's environment.
2. Confirm that the merchant environment is properly scoped.
3. Assess the environment for compliance with PCI DSS requirements.
4. Complete all sections of this document:
  - Section 1: Assessment Information (Parts 1 & 2 of the Attestation of Compliance (AOC) – Contact Information and Executive Summary).
  - Section 2: Self-Assessment Questionnaire P2PE.
  - Section 3: Validation and Attestation Details (Parts 3 & 4 of the AOC – PCI DSS Validation and Action Plan for Non-Compliant Requirements (if Part 4 is applicable)).
5. Submit the SAQ and AOC, along with any other requested documentation—such as ASV scan reports—to the requesting organization (those organizations that manage compliance programs such as payment brands and acquirers).

## Expected Testing

The instructions provided in the “Expected Testing” column are based on the testing procedures in PCI DSS and provide a high-level description of the types of testing activities that a merchant is expected to perform to verify that a requirement has been met.

The intent behind each testing method is described as follows:

- **Examine:** The merchant critically evaluates data evidence. Common examples include documents (electronic or physical), screenshots, configuration files, audit logs, and data files.
- **Observe:** The merchant watches an action or views something in the environment. Examples of observation subjects include personnel performing a task or process, system components performing a function or responding to input, environmental conditions, and physical controls.

- Interview: The merchant converses with individual personnel. Interview objectives may include confirmation of whether an activity is performed, descriptions of how an activity is performed, and whether personnel have particular knowledge or understanding.

The testing methods are intended to allow the merchant to demonstrate how it has met a requirement. The specific items to be examined or observed and personnel to be interviewed should be appropriate for both the requirement being assessed and the merchant's particular implementation.

Full details of testing procedures for each requirement can be found in PCI DSS.

## Requirement Responses

For each requirement item, there is a choice of responses to indicate the merchant's status regarding that requirement. **Only one response should be selected for each requirement item.**

A description of the meaning for each response and when to use each response is provided in the table below:

Response	When to use this response:
<b>In Place</b>	The expected testing has been performed, and all elements of the requirement have been met as stated.
<b>In Place with CCW</b> (Compensating Controls Worksheet)	The expected testing has been performed, and the requirement has been met with the assistance of a compensating control.  All responses in this column require completion of a Compensating Controls Worksheet (CCW) in Appendix B of this SAQ.  Information on the use of compensating controls and guidance on how to complete the worksheet is provided in PCI DSS in Appendices B and C.
<b>Not Applicable</b>	The requirement does not apply to the merchant's environment. (See "Guidance for Not Applicable Requirements" below for examples.)  All responses in this column require a supporting explanation in Appendix C of this SAQ.
<b>Not Tested</b>	<i>This response is not applicable to, and not included as an option for, this SAQ.</i>  <i>This SAQ was created for a specific type of environment based on how the merchant stores, processes, and/or transmits account data and defines the specific PCI DSS requirements that apply for this environment. Consequently, all requirements in this SAQ must be tested.</i>
<b>Not in Place</b>	Some or all elements of the requirement have not been met, or are in the process of being implemented, or require further testing before the merchant can confirm they are in place. Responses in this column may require the completion of Part 4, if requested by the entity to which this SAQ will be submitted.  This response is also used if a requirement cannot be met due to a legal restriction. (See "Legal Exception" below for more guidance).

## Guidance for Not Applicable Requirements

If any requirements do not apply to the merchant's environment, select the Not Applicable option for that specific requirement. For example, in this SAQ, requirements for securing all media with cardholder data (Requirements 9.4.1 - 9.4.6) only apply if a merchant stores paper media with cardholder data; if paper media is not stored, the merchant can select Not Applicable for those requirements.

For each response where Not Applicable is selected in this SAQ, complete *Appendix C: Explanation of Requirements Noted as Not Applicable*.

## Guidance for Responding to Future Dated Requirements

In Section 2 below, each PCI DSS requirement or bullet with an extended implementation period includes the following note: "*This requirement [or bullet] is a best practice until 31 March 2025, after which it will be required and must be fully considered during a PCI DSS assessment.*"

These new requirements are not required to be included in a PCI DSS assessment until the future date has passed. Prior to that future date, any requirements with an extended implementation date that have not been implemented by the merchant may be marked as Not Applicable and documented in *Appendix C: Explanation of Requirements Noted as Not Applicable*.

## Legal Exception

If your organization is subject to a legal restriction that prevents the organization from meeting a PCI DSS requirement, select Not in Place for that requirement and complete the relevant attestation in Section 3, Part 3 of this SAQ.

**Note:** A legal exception is a legal restriction due to a local or regional law, regulation, or regulatory requirement, where meeting a PCI DSS requirement would violate that law, regulation, or regulatory requirement.

Contractual obligations or legal advice are not legal restrictions.

## Use of the Customized Approach

SAQs cannot be used to document use of the Customized Approach to meet PCI DSS requirements. For this reason, the Customized Approach Objectives are not included in SAQs. Entities wishing to validate using the Customized Approach may be able to use the PCI DSS Report on Compliance (ROC) Template to document the results of their assessment.

Use of the Customized Approach is not supported in SAQs.

The use of the customized approach may be regulated by organizations that manage compliance programs, such as payment brands and acquirers. Questions about use of a customized approach should always be referred to those organizations. This includes whether an entity that is eligible for an SAQ may instead complete a ROC to use a customized approach, and whether an entity is required to use a QSA, or may use an ISA, to complete an assessment using the customized approach. Information about the use of the Customized Approach can be found in Appendices D and E of PCI DSS.

## Additional PCI SSC Resources

Additional resources that provide guidance on PCI DSS requirements and how to complete the self-assessment questionnaire have been provided below to assist with the assessment process.

Resource	Includes:
PCI Data Security Standard Requirements and Testing Procedures (PCI DSS)	<ul style="list-style-type: none"> <li>▪ Guidance on Scoping</li> <li>▪ Guidance on the intent of all PCI DSS Requirements</li> <li>▪ Details of testing procedures</li> <li>▪ Guidance on Compensating Controls</li> <li>▪ Appendix G: Glossary of Terms, Abbreviations, and Acronyms</li> </ul>
SAQ Instructions and Guidelines	<ul style="list-style-type: none"> <li>▪ Information about all SAQs and their eligibility criteria</li> <li>▪ How to determine which SAQ is right for your organization</li> </ul>
Frequently Asked Questions (FAQs)	<ul style="list-style-type: none"> <li>▪ Guidance and information about SAQs.</li> </ul>
Online PCI DSS Glossary	<ul style="list-style-type: none"> <li>▪ PCI DSS Terms, Abbreviations, and Acronyms</li> </ul>
Information Supplements and Guidelines	<ul style="list-style-type: none"> <li>▪ Guidance on a variety of PCI DSS topics including:           <ul style="list-style-type: none"> <li>– <i>Understanding PCI DSS Scoping and Network Segmentation</i></li> <li>– <i>Third-Party Security Assurance</i></li> <li>– <i>Multi-Factor Authentication Guidance</i></li> <li>– <i>Best Practices for Maintaining PCI DSS Compliance</i></li> </ul> </li> </ul>
Getting Started with PCI	<ul style="list-style-type: none"> <li>▪ Resources for smaller merchants including:           <ul style="list-style-type: none"> <li>– <i>Guide to Safe Payments</i></li> <li>– <i>Common Payment Systems</i></li> <li>– <i>Questions to Ask Your Vendors</i></li> <li>– <i>Glossary of Payment and Information Security Terms</i></li> <li>– <i>PCI Firewall Basics</i></li> <li>– <i>ASV Resource Guide</i></li> </ul> </li> </ul>

These and other resources can be found on the PCI SSC website ([www.pcisecuritystandards.org](http://www.pcisecuritystandards.org)).

Organizations are encouraged to review PCI DSS and other supporting documents before beginning an assessment.

## Section 1: Assessment Information

### Instructions for Submission

This document must be completed as a declaration of the results of the merchant's self-assessment against the *Payment Card Industry Data Security Standard (PCI DSS) Requirements and Testing Procedures*. Complete all sections. The merchant 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.

#### Part 1. Contact Information

##### Part 1a. Assessed Merchant

Company name:	
DBA (doing business as):	
Company mailing address:	
Company main website:	
Company contact name:	
Company contact title:	
Contact phone number:	
Contact e-mail address:	

##### 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):	
Qualified Security Assessor	
Company name:	
Company mailing address:	
Company website:	
Lead Assessor Name:	
Assessor phone number:	
Assessor e-mail address:	
Assessor certificate number:	

## Part 2. Executive Summary

### Part 2a. Merchant Business Payment Channels (select all that apply):

Indicate all payment channels used by the business that are included in this assessment.

- Mail order/telephone order (MOTO)  
 Card-present

Are any payment channels not included in this assessment?

Yes  No

If yes, indicate which channel(s) is not included in the assessment and provide a brief explanation about why the channel was excluded.

**Note:** If the organization has a payment channel that is not covered by this SAQ, consult with the entity(ies) to which this AOC will be submitted about validation for the other channels.

### Part 2b. Description of Role with Payment Cards

For each payment channel included in this assessment as selected in Part 2a above, describe how the business stores, processes and/or transmits account data.

Channel	How Business Stores, Processes, and/or Transmits Account Data

### 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.

Indicate whether the environment includes segmentation to reduce the scope of the assessment.

Yes  No

(Refer to “Segmentation” section of PCI DSS for guidance on segmentation.)

## Part 2. Executive Summary (continued)

### Part 2d. In-Scope Locations/Facilities

List all types of physical locations/facilities (for example, retail locations, 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>

### Part 2e. PCI Validated P2PE Solution

Provide the following information regarding the validated\* PCI-listed P2PE solution used by the merchant:

Name of P2PE Solution Provider:	
Name of P2PE Solution:	
P2PE Solution listing “Reference #”:	
Listed POI Devices used by Merchant (found under “PTS POI Devices Supported”):	
P2PE Solution “Reassessment Date”:	

\* P2PE solutions on the PCI list of Point-to-Point Solutions with Expired Validations are no longer considered “validated” per the P2PE Program Guide. Merchants using an expired P2PE solution should check with their acquirer or individual payment brands about acceptability of this SAQ.

## **Part 2. Executive Summary (continued)**

## **Part 2f. Third-Party Service Providers**

Does the merchant have relationships with one or more third-party service providers that:

<ul style="list-style-type: none"><li>• Store, process, or transmit account data on the merchant's behalf (for example, payment gateways, payment processors, payment service providers (PSPs), and off-site storage)</li></ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"><li>• Manage system components included in the scope of the merchant'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.</li></ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"><li>• Could impact the security of the merchant's CDE (for example, vendors providing support via remote access, and/or bespoke software developers)</li></ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No

**If Yes:**

**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 that were selected for each PCI DSS requirement.

PCI DSS Requirement *	Requirement Responses			
	<i>More than one response may be selected for a given requirement. Indicate all responses that apply.</i>			
	In Place	In Place with CCW	Not Applicable	Not in Place
Requirement 3:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 9:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 12:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

\* PCI DSS Requirements indicated above refer to the requirements in Section 2 of this SAQ.

### Part 2h. Eligibility to Complete SAQ P2PE

Merchant certifies eligibility to complete this Self-Assessment Questionnaire because, for this payment channel:

<input type="checkbox"/>	All payment processing is via a validated PCI-listed P2PE solution (per Part 2e above).
<input type="checkbox"/>	The only systems in the merchant environment that store, process, or transmit account data are the payment terminals from a validated PCI-listed P2PE solution.
<input type="checkbox"/>	The merchant does not otherwise receive, transmit, or store account data electronically.
<input type="checkbox"/>	Any account data the merchant might retain is on paper (for example, printed reports or receipts), and these documents are not received electronically.
<input type="checkbox"/>	The merchant has implemented all controls in the <i>P2PE Instruction Manual (PIM)</i> provided by the P2PE Solution Provider.

## Section 2: Self-Assessment Questionnaire P2PE

**Note:** The following requirements mirror the requirements in the PCI DSS Requirements and Testing Procedures document.

**Self-assessment completion date:** YYYY-MM-DD

### Protect Account Data

#### Requirement 3: Protect Stored Account Data

**Note:** For SAQ P2PE, Requirement 3 applies only to merchants with paper records that include account data (for example, receipts or printed reports).

PCI DSS Requirement	Expected Testing	Response*			
		In Place	In Place with CCW	Not Applicable	Not in Place
<b>3.1 Processes and mechanisms for protecting stored account data are defined and understood.</b>					
3.1.1 All security policies and operational procedures that are identified in Requirement 3 are: <ul style="list-style-type: none"> <li>• Documented.</li> <li>• Kept up to date.</li> <li>• In use.</li> <li>• Known to all affected parties.</li> </ul>	<ul style="list-style-type: none"> <li>• Examine documentation.</li> <li>• Interview personnel.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### SAQ Completion Guidance:

Selection of any of the *In Place* responses for Requirement 3.1.1 means that, if the merchant has paper storage of account data, the merchant has policies and procedures in place that govern merchant activities for Requirement 3. This helps to ensure personnel are aware of and following security policies and documented operational procedures for managing the secure storage of any paper records with account data.

If merchant does not store paper records with account data, mark this requirement as *Not Applicable* and complete Appendix C: Explanation of Requirements Noted as *Not Applicable*.

\* Refer to the "Requirement Responses" section (page v) for information about these response options.

PCI DSS Requirement	Expected Testing	Response♦ (Check one response for each requirement)			
		In Place	In Place with CCW	Not Applicable	Not in Place
<b>3.2 Storage of account data is kept to a minimum.</b>					
<b>3.2.1</b> Account data storage is kept to a minimum through implementation of data retention and disposal policies, procedures, and processes that include at least the following: <ul style="list-style-type: none"> <li>• Coverage for all locations of stored account data.</li> <li>• Coverage for any sensitive authentication data (SAD) stored prior to completion of authorization. <i>This bullet is a best practice until its effective date; refer to Applicability Notes below for details.</i></li> <li>• Limiting data storage amount and retention time to that which is required for legal or regulatory, and/or business requirements.</li> <li>• Specific retention requirements for stored account data that defines length of retention period and includes a documented business justification.</li> <li>• Processes for secure deletion or rendering account data unrecoverable when no longer needed per the retention policy.</li> <li>• A process for verifying, at least once every three months, that stored account data exceeding the defined retention period has been securely deleted or rendered unrecoverable.</li> </ul>	<ul style="list-style-type: none"> <li>• Examine the data retention and disposal policies, procedures, and processes.</li> <li>• Interview personnel.</li> <li>• Examine files and system records on system components where account data is stored.</li> <li>• Observe the mechanisms used to render account data unrecoverable.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Applicability Notes</b>					
Where account data is stored by a TPSP (for example, in a cloud environment), entities are responsible for working with their service providers to understand how the TPSP meets this requirement for the entity. Considerations include ensuring that all geographic instances of a data element are securely deleted.  <i>The bullet above (for coverage of SAD stored prior to completion of authorization) is a best practice until 31 March 2025, after which it will be required as part of Requirement 3.2.1 and must be fully considered during a PCI DSS assessment.</i>					

PCI DSS Requirement	Expected Testing	Response*				
		In Place	In Place with CCW	Not Applicable	Not in Place	
<b>SAQ Completion Guidance:</b>						
<p><i>Selection of any of the In Place responses for Requirement 3.2.1 means that the merchant has data disposal policies that govern account data storage and if a merchant stores any paper (for example, receipts or paper reports) that contain account data, the merchant stores the paper per that policy (for example, only as long as it is needed for business, legal, and/or regulatory reasons) and destroys the paper once it is no longer needed.</i></p> <p><i>If a merchant never prints or stores any paper containing account data, mark this requirement as Not Applicable and complete Appendix C: Explanation of Requirements Noted as Not Applicable.</i></p>						
<b>3.3 Sensitive authentication data (SAD) is not stored after authorization.</b>						
3.3.1.2	<p>The card verification code is not stored upon completion of the authorization process.</p> <p><b>Applicability Notes</b></p> <p>The card verification code is the three- or four-digit number printed on the front or back of a payment card used to verify card-not-present transactions.</p>	<ul style="list-style-type: none"> <li>• Examine data sources.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>SAQ Completion Guidance:</b>						
<p><i>Selection of any of the In Place responses for Requirement 3.3.1.2 means that if the merchant writes down the card verification code while a transaction is being conducted, the merchant either securely destroys the paper (for example, with a shredder) immediately after the transaction is complete, or obscures the code (for example, by “blacking it out” with a marker) before the paper is stored.</i></p> <p><i>If the merchant never requests the three-digit or four-digit number printed on the front or back of a payment card (“card verification code”), mark this requirement as Not Applicable and complete Appendix C: Explanation of Requirements Noted as Not Applicable.</i></p>						

## Implement Strong Access Control Measures

### Requirement 9: Restrict Physical Access to Cardholder Data

PCI DSS Requirement	Expected Testing	Response*				
		In Place	In Place with CCW	Not Applicable	Not in Place	
<b>9.1</b> Processes and mechanisms for restricting physical access to cardholder data are defined and understood.						
9.1.1	<p>All security policies and operational procedures that are identified in Requirement 9 are:</p> <ul style="list-style-type: none"> <li>• Documented.</li> <li>• Kept up to date.</li> <li>• In use.</li> <li>• Known to all affected parties.</li> </ul>	<ul style="list-style-type: none"> <li>• Examine documentation.</li> <li>• Interview personnel.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### SAQ Completion Guidance:

Selection of any of the *In Place* responses for Requirement 9.1.1 means that the merchant has policies and procedures in place that govern merchant activities for Requirement 9, including how any paper media with cardholder data is secured, and how POI devices are protected.

### 9.4 Media with cardholder data is securely stored, accessed, distributed, and destroyed.

**Note:** For SAQ P2PE, Requirements at 9.4 only apply to merchants with paper records (for example, receipts or printed reports) with account data, including primary account numbers (PANs).

9.4.1	All media with cardholder data is physically secured.	<ul style="list-style-type: none"> <li>• Examine documentation.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.4.1.1	Offline media backups with cardholder data are stored in a secure location.	<ul style="list-style-type: none"> <li>• Examine documented procedures.</li> <li>• Examine logs or other documentation.</li> <li>• Interview responsible personnel at the storage location(s).</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

\* Refer to the "Requirement Responses" section (page v) for information about these response options.

PCI DSS Requirement	Expected Testing	Response♦ (Check one response for each requirement)			
		In Place	In Place with CCW	Not Applicable	Not in Place
<b>9.4.6</b>  Hard-copy materials with cardholder data are destroyed when no longer needed for business or legal reasons, as follows: <ul style="list-style-type: none"><li>• Materials are cross-cut shredded, incinerated, or pulped so that cardholder data cannot be reconstructed.</li><li>• Materials are stored in secure storage containers prior to destruction.</li></ul>	<ul style="list-style-type: none"><li>• Examine the media destruction policy.</li><li>• Observe processes.</li><li>• Interview personnel.</li><li>• Observe storage containers.</li></ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Applicability Notes

These requirements for media destruction when that media is no longer needed for business or legal reasons are separate and distinct from PCI DSS Requirement 3.2.1, which is for securely deleting cardholder data when no longer needed per the entity's cardholder data retention policies.

#### SAQ Completion Guidance:

*Selection of any of the In Place responses for Requirements at 9.4 means that the merchant securely stores any paper media with account data, for example by storing the paper in a locked drawer, cabinet, or safe, and that the merchant destroys such paper when no longer needed for business purposes. This includes a written document or policy for employees, so they know how to secure paper with account data and how to destroy the paper when no longer needed.*

*If the merchant never stores any paper with account data, mark this requirement as Not Applicable and complete Appendix C: Explanation of Requirements Noted as Not Applicable.*

PCI DSS Requirement	Expected Testing	Response♦ (Check one response for each requirement)				
		In Place	In Place with CCW	Not Applicable	Not in Place	
<b>9.5 Point-of-interaction (POI) devices are protected from tampering and unauthorized substitution.</b>						
<i>Note: For SAQ P2PE, these requirements apply to the POI devices used by the merchant at part of the P2PE solution.</i>						
9.5.1	<p>POI devices that capture payment card data via direct physical interaction with the payment card form factor are protected from tampering and unauthorized substitution, including the following:</p> <ul style="list-style-type: none"> <li>Maintaining a list of POI devices.</li> <li>Periodically inspecting POI devices to look for tampering or unauthorized substitution.</li> <li>Training personnel to be aware of suspicious behavior and to report tampering or unauthorized substitution of devices.</li> </ul>	<ul style="list-style-type: none"> <li>Examine documented policies and procedures.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Applicability Notes</b>						
These requirements apply to deployed POI devices used in card-present transactions (that is, a payment card form factor such as a card that is swiped, tapped, or dipped).						
These requirements do not apply to:						
<ul style="list-style-type: none"> <li>Components used only for manual PAN key entry.</li> <li>Commercial off-the-shelf (COTS) devices (for example, smartphones or tablets), which are mobile merchant-owned devices designed for mass-market distribution.</li> </ul>						
9.5.1.1	An up-to-date list of POI devices is maintained, including: <ul style="list-style-type: none"> <li>Make and model of the device.</li> <li>Location of device.</li> <li>Device serial number or other methods of unique identification.</li> </ul>	<ul style="list-style-type: none"> <li>Examine the list of POI devices.</li> <li>Observe POI devices and device locations.</li> <li>Interview personnel.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.5.1.2	POI device surfaces are periodically inspected to detect tampering and unauthorized substitution.	<ul style="list-style-type: none"> <li>Examine documented procedures.</li> <li>Interview responsible personnel.</li> <li>Observe inspection processes.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.5.1.2.1	<i>Requirement intentionally left blank for this SAQ.</i>					

PCI DSS Requirement	Expected Testing	Response♦ (Check one response for each requirement)				
		In Place	In Place with CCW	Not Applicable	Not in Place	
<b>9.5.1.3</b>	<p>Training is provided for personnel in POI environments to be aware of attempted tampering or replacement of POI devices, and includes:</p> <ul style="list-style-type: none"> <li>Verifying the identity of any third-party persons claiming to be repair or maintenance personnel, before granting them access to modify or troubleshoot devices.</li> <li>Procedures to ensure devices are not installed, replaced, or returned without verification.</li> <li>Being aware of suspicious behavior around devices.</li> <li>Reporting suspicious behavior and indications of device tampering or substitution to appropriate personnel.</li> </ul>	<ul style="list-style-type: none"> <li>Review training materials for personnel in POI environments.</li> <li>Interview responsible personnel.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**SAQ Completion Guidance:**

*Selection of any of the In Place responses for Requirements at 9.5 means that the merchant has policies and procedures in place for Requirements 9.5.1, 9.5.1.1, 9.5.1.2, and 9.5.1.3, and that they maintain a current list of devices, conduct periodic device inspections, and train employees about what to look for to detect tampered or substituted devices.*

## Maintain an Information Security Policy

### **Requirement 12: Support Information Security with Organizational Policies and Programs**

**Note:** Requirement 12 specifies that merchants have information security policies for their personnel, but these policies can be as simple or complex as needed for the size and complexity of the merchant's operations. The policy document must be provided to all personnel so they are aware of their responsibilities for protecting payment terminals, any paper documents with cardholder data and/or sensitive authentication data, etc. If a merchant has no employees, then it is expected that the merchant understands and acknowledges their responsibility for security within their store(s).

PCI DSS Requirement	Expected Testing	Response*			
		In Place	In Place with CCW	Not Applicable	Not in Place
<b>12.1 A comprehensive information security policy that governs and provides direction for protection of the entity's information assets is known and current.</b>					
12.1.1 An overall information security policy is: <ul style="list-style-type: none"> <li>• Established.</li> <li>• Published.</li> <li>• Maintained.</li> <li>• Disseminated to all relevant personnel, as well as to relevant vendors and business partners.</li> </ul>	<ul style="list-style-type: none"> <li>• Examine the information security policy.</li> <li>• Interview personnel.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12.1.2 The information security policy is: <ul style="list-style-type: none"> <li>• Reviewed at least once every 12 months.</li> <li>• Updated as needed to reflect changes to business objectives or risks to the environment</li> </ul>	<ul style="list-style-type: none"> <li>• Examine the information security policy.</li> <li>• Interview responsible personnel.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### **SAQ Completion Guidance:**

Selection of any of the *In Place* responses for Requirements 12.1.1 and 12.1.2 means that the merchant has a security policy that is reasonable for the size and complexity of the merchant's operations, and that the policy is reviewed at least once every 12 months and updated if needed. For example, such a policy could be a simple document that covers how to protect the store and payment devices in accordance with the solution provider's guidance/instruction manual, and who to call in an emergency.

\* Refer to the "Requirement Responses" section (page v) for information about these response options.

PCI DSS Requirement	Expected Testing	Response*				
		In Place	In Place with CCW	Not Applicable	Not in Place	
<b>12.1.3</b>	The security policy clearly defines information security roles and responsibilities for all personnel, and all personnel are aware of and acknowledge their information security responsibilities.	<ul style="list-style-type: none"> <li>Examine the information security policy.</li> <li>Interview responsible personnel.</li> <li>Examine documented evidence.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**SAQ Completion Guidance:**

*Selection of any of the In Place responses for Requirement 12.1.3 means that the merchant's security policy defines basic security responsibilities for all personnel, consistent with the size and complexity of the merchant's operations. For example, security responsibilities could be defined according to basic responsibilities by employee levels, such as the responsibilities expected of a manager/owner and those expected of clerks.*

**12.6 Security awareness education is an ongoing activity.**

<b>12.6.1</b>	A formal security awareness program is implemented to make all personnel aware of the entity's information security policy and procedures, and their role in protecting the cardholder data.	<ul style="list-style-type: none"> <li>Examine the security awareness program.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**SAQ Completion Guidance:**

*Selection of any of the In Place responses for Requirement 12.6.1 means that the merchant has a security awareness program in place, consistent with the size and complexity of the merchant's operations. For example, a simple awareness program could be a flyer posted in the back office, or a periodic e-mail sent to all employees. Examples of awareness program messaging include descriptions of security tips all employees should follow, such as how to lock doors and storage containers, how to determine whether a payment terminal has been tampered with, and processes to confirm the identity and verify there is a legitimate business reason for any service workers when they arrive to service payment terminals.*

**12.8 Risk to information assets associated with third-party service provider (TPSP) relationships is managed.**

<b>12.8.1</b>	A list of all third-party service providers (TPSPs) with which account data is shared or that could affect the security of account data is maintained, including a description for each of the services provided.	<ul style="list-style-type: none"> <li>Examine policies and procedures.</li> <li>Examine list of TPSPs.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Applicability Notes</b>						
The use of a PCI DSS compliant TPSP does not make an entity PCI DSS compliant, nor does it remove the entity's responsibility for its own PCI DSS compliance.						

PCI DSS Requirement		Expected Testing	Response♦ (Check one response for each requirement)			
			In Place	In Place with CCW	Not Applicable	Not in Place
12.8.2	<p>Written agreements with TPSPs are maintained as follows:</p> <ul style="list-style-type: none"> <li>Written agreements are maintained with all TPSPs with which account data is shared or that could affect the security of the CDE.</li> <li>Written agreements include acknowledgments from TPSPs that TPSPs are responsible for the security of account data the TPSPs possess or otherwise store, process, or transmit on behalf of the entity, or to the extent that the TPSP could impact the security of the entity's cardholder data and/or sensitive authentication data.</li> </ul>	<ul style="list-style-type: none"> <li>Examine policies and procedures.</li> <li>Examine written agreements with TPSPs.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Applicability Notes</b>						
<p>The exact wording of an agreement will depend on the details of the service being provided, and the responsibilities assigned to each party. The agreement does not have to include the exact wording provided in this requirement.</p> <p>The TPSP's written acknowledgment is a confirmation that states the TPSP is responsible for the security of the account data it may store, process, or transmit on behalf of the customer or to the extent the TPSP may impact the security of a customer's cardholder data and/or sensitive authentication data.</p> <p>Evidence that a TPSP is meeting PCI DSS requirements (is not the same as a written acknowledgment specified in this requirement. For example, a PCI DSS Attestation of Compliance (<a href="#">AOC</a>), a declaration on a company's website, a policy statement, a responsibility matrix, or other evidence not included in a written agreement is not a written acknowledgment.</p>						
12.8.3	An established process is implemented for engaging TPSPs, including proper due diligence prior to engagement.	<ul style="list-style-type: none"> <li>Examine policies and procedures.</li> <li>Examine evidence.</li> <li>Interview responsible personnel.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

PCI DSS Requirement	Expected Testing	Response*				
		In Place	In Place with CCW	Not Applicable	Not in Place	
12.8.4	<p>A program is implemented to monitor TPSPs' PCI DSS compliance status at least once every 12 months.</p> <p><b>Applicability Notes</b></p> <p>Where an entity has an agreement with a TPSP for meeting PCI DSS requirements on behalf of the entity (for example, via a firewall service), the entity must work with the TPSP to make sure the applicable PCI DSS requirements are met. If the TPSP does not meet those applicable PCI DSS requirements, then those requirements are also "not in place" for the entity.</p>	<ul style="list-style-type: none"> <li>Examine policies and procedures.</li> <li>Examine documentation.</li> <li>Interview responsible personnel.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12.8.5	Information is maintained about which PCI DSS requirements are managed by each TPSP, which are managed by the entity, and any that are shared between the TPSP and the entity.	<ul style="list-style-type: none"> <li>Examine policies and procedures.</li> <li>Examine documentation.</li> <li>Interview responsible personnel.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>SAQ Completion Guidance:</b>						
<p><i>Selection of any of the In Place responses for Requirements 12.8.1 through 12.8.5 means that the merchant has a list of, and agreements with, service providers they share account data with or that could impact the security of the merchant's cardholder data environment. For example, such agreements would be applicable if a merchant uses a document-retention company to store paper documents that include account data or if a merchant's vendor accesses merchant systems remotely to perform maintenance.</i></p>						
<b>12.10 Suspected and confirmed security incidents that could impact the CDE are responded to immediately.</b>						
12.10.1	An incident response plan exists and is ready to be activated in the event of a suspected or confirmed security incident.	<ul style="list-style-type: none"> <li>Examine the incident response plan.</li> <li>Interview personnel.</li> <li>Examine documentation from previously reported incidents.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**SAQ Completion Guidance:**

*Selection of any of the In Place responses for Requirement 12.10.1 means that the merchant has documented an incident response and escalation plan to be used for emergencies, consistent with the size and complexity of the merchant's operations. For example, such a plan could be a simple document posted in the back office that lists who to call in the event of various situations with an annual review to confirm it is still accurate, but could extend all the way to a full incident response plan including backup "hotsite" facilities and thorough annual testing. This plan should be readily available to all personnel as a resource in an emergency.*

## Appendix A: Additional PCI DSS Requirements

### ***Appendix A1: Additional PCI DSS Requirements for Multi-Tenant Service Providers***

This Appendix is not used for merchant assessments.

### ***Appendix A2: Additional PCI DSS Requirements for Entities using SSL/Early TLS for Card-Present POS POI Terminal Connections***

This Appendix is not used for SAQ P2PE merchant assessments.

### ***Appendix A3: Designated Entities Supplemental Validation (DESV)***

This Appendix applies only to entities designated by a payment brand(s) or acquirer as requiring additional validation of existing PCI DSS requirements. Entities required to validate to this Appendix should use the DESV Supplemental Reporting Template and Supplemental Attestation of Compliance for reporting, and consult with the applicable payment brand and/or acquirer for submission procedures.

## Appendix B: Compensating Controls Worksheet

*This Appendix must be completed to define compensating controls for any requirement where In Place with CCW was selected.*

**Note:** Only entities that have a legitimate and documented technological or business constraint can consider the use of compensating controls to achieve compliance.

Refer to Appendices B and C in PCI DSS for information about compensating controls and guidance on how to complete this worksheet.

### Requirement Number and Definition:

	Information Required	Explanation
<b>1. Constraints</b>	Document the legitimate technical or business constraints precluding compliance with the original requirement.	
<b>2. Definition of Compensating Controls</b>	Define the compensating controls: explain how they address the objectives of the original control and the increased risk, if any.	
<b>3. Objective</b>	Define the objective of the original control.	
	Identify the objective met by the compensating control.  <b>Note:</b> This can be, but is not required to be, the stated Customized Approach Objective listed for this requirement in PCI DSS.	
<b>4. Identified Risk</b>	Identify any additional risk posed by the lack of the original control.	
<b>5. Validation of Compensating Controls</b>	Define how the compensating controls were validated and tested.	
<b>6. Maintenance</b>	Define process(es) and controls in place to maintain compensating controls.	

## **Appendix C: Explanation of Requirements Noted as Not Applicable**

*This Appendix must be completed for each requirement where Not Applicable was selected.*

Requirement	Reason Requirement is Not Applicable
Example:	
Requirement 3.5.1	<i>Account data is never stored electronically</i>

## Appendix D: Explanation of Requirements Noted as Not Tested

This Appendix is not used for SAQ P2PE merchant assessments.

## Section 3: Validation and Attestation Details

### Part 3. PCI DSS Validation

**This AOC is based on results noted in SAQ P2PE (Section 2), dated (Self-assessment completion date YYYY-MM-DD).**

Based on the results documented in the SAQ P2PE noted above, each signatory identified in any of Parts 3b–3d, as applicable, assert(s) the following compliance status for the merchant identified in Part 2 of this document.

**Select one:**

<input type="checkbox"/>	<b>Compliant:</b> All sections of the PCI DSS SAQ are complete and all requirements are marked as being either 1) In Place, 2) In Place with CCW, or 3) Not Applicable, resulting in an overall <b>COMPLIANT</b> rating; thereby ( <i>Merchant Company Name</i> ) has demonstrated compliance with all PCI DSS requirements included in this SAQ.								
<input type="checkbox"/>	<b>Non-Compliant:</b> 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 <b>NON-COMPLIANT</b> rating; thereby ( <i>Merchant Company Name</i> ) has not demonstrated compliance with the PCI DSS requirements included in this SAQ.  <b>Target Date for Compliance:</b> YYYY-MM-DD  A merchant 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> .								
<input type="checkbox"/>	<b>Compliant but with Legal exception:</b> One or more 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 requirements are marked as being either 1) In Place, 2) In Place with CCW, or 3) Not Applicable, resulting in an overall <b>COMPLIANT BUT WITH LEGAL EXCEPTION</b> rating; thereby ( <i>Merchant Company Name</i> ) has demonstrated compliance with all PCI DSS requirements included in this SAQ except those noted as Not in Place due to a legal restriction.  This option requires additional review from the entity to which this AOC will be submitted. <i>If selected, complete the following:</i>								
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center; background-color: #f2f2f2;">Affected Requirement</th> <th style="text-align: center; background-color: #f2f2f2;">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. Merchant Acknowledgement

**Signatory(s) confirms:**

(Select all that apply)

- |                          |  |
|--------------------------|--|
| <input type="checkbox"/> | PCI DSS Self-Assessment Questionnaire P2PE, Version 4.0.1, was completed according to the instructions therein.  |
| <input type="checkbox"/> | All information within the above-referenced SAQ and in this attestation fairly represents the results of the merchant's assessment in all material respects. |
| <input type="checkbox"/> | PCI DSS controls will be maintained at all times, as applicable to the merchant's environment.   |

### Part 3b. Merchant Attestation

<i>Signature of Merchant Executive Officer ↑</i>	Date: YYYY-MM-DD
<i>Merchant Executive Officer Name:</i>	<i>Title:</i>

### Part 3c. Qualified Security Assessor (QSA) Acknowledgement

If a QSA was involved or assisted with this assessment, indicate the role performed:

QSA performed testing procedures.

QSA provided other assistance.

If selected, describe all role(s) performed:

<i>Signature of Lead QSA ↑</i>	Date: YYYY-MM-DD
Lead QSA Name:	

<i>Signature of Duly Authorized Officer of QSA Company ↑</i>	Date: YYYY-MM-DD
<i>Duly Authorized Officer Name:</i>	<i>QSA Company:</i>

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

If an ISA(s) was involved or assisted with this assessment, indicate the role performed:

ISA(s) performed testing procedures.

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 merchant 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	
3	Protect stored account data	<input type="checkbox"/>	<input type="checkbox"/>	
9	Restrict physical access to cardholder data.	<input type="checkbox"/>	<input type="checkbox"/>	
12	Support information security with organizational policies and programs	<input type="checkbox"/>	<input type="checkbox"/>	

\* PCI DSS Requirements indicated above refer to the requirements in Section 2 of this SAQ.

**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/](https://www.pcisecuritystandards.org/about_us/).