# Payment Card Industry (PCI)
# Data Security Standard

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# Attestation of Compliance for
# Onsite Assessments – Service Providers

**Version 3.2.1**

Using the PCI Security Standards Council Template dated 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: | CyrusOne LLC | DBA (doing business as): | Not Applicable. | |
| Contact Name: | Michael Smith | Title: | Compliance Controls Manager | |
| Telephone: | (469) 289-2029 | E-mail: | msmith@cyrusone.com | |
| Business Address: | 2850 N Harwood St Suite 2200 | City: | Dallas | |
| State/Province: | Texas | Country: | United States of America | Zip: 75201 |
| URL: | http://www.cyrusone.com/ | | | |

| Part 1b. Qualified Security Assessor Company Information (if applicable) | | | | |
|---|---|---|---|---|
| Company Name: | A-LIGN Compliance and Security, Inc. dba A-LIGN | | | |
| Lead QSA Contact Name: | John Bowman | Title: | Associate Manager | |
| Telephone: | 1-888-702-5446 | E-mail: | John.Bowman@A-LIGN.com | |
| Business Address: | 400 N. Ashley Drive, Suite 1325 | City: | Tampa | |
| State/Province: | Florida | Country: | United States | Zip: 33602 |
| URL: | www.A-LIGN.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: | Colocation Services |
| --- | --- |

Type of service(s) assessed:

| **Hosting Provider:** | **Managed Services (specify):** | **Payment Processing:** |
| --- | --- | --- |
| ☐ Applications / software | ☐ Systems security services | ☐ POS / 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 | | |
| ☐ Security services | | |
| ☐ 3-D Secure Hosting Provider | | |
| ☐ Shared Hosting 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 | | |
| ☐ Others (specify): Not Applicable. | | |

*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: | Dedicated Hosting |
|---|---|

Type of service(s) not assessed:

| **Hosting Provider:** | **Managed Services (specify):** | **Payment Processing:** |
|---|---|---|
| ☐ Applications / software | ☐ Systems security services | ☐ POS / 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 | | |
| ☐ Security services | | |
| ☐ 3-D Secure Hosting Provider | | |
| ☐ Shared Hosting 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 | | |

☐ Others (specify): Not Applicable.

| Provide a brief explanation why any checked services were not included in the assessment: | Only colocation services are in scope for this assessment. |
|---|---|

| Part 2b. Description of Payment Card Business | |
|---|---|
| Describe how and in what capacity your business stores, processes, and/or transmits cardholder data. | The entity does not store, process, or transmit cardholder data. They do, however, provide the physical space and security for the customers to host servers which could potentially store, process, or transmit payment card data. |
| Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data. | The entity provides the physical space and security for their clients to host servers which could potentially store, process, or transmit payment card data. CyrusOne manages the physical controls protecting the physical devices that are hosted within the CyrusOne data centers. |

| 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): |
|---|---|---|
| *Example: Retail outlets* | *3* | *Boston, MA, USA* |
| Corporate Office | 1 | 2101 Cedar Springs Road, Suite 900, Dallas, TX, USA |
| Data Center Facilities | 46 | Phoenix 1 - Chandler 1 - Building 3  2335 South Ellis Street Chandler, AZ 85286 |
| | | Phoenix 1 - Chandler 2 - Building 4  2305 South Ellis Street Chandler, AZ 85286 |
| | | Phoenix 1 - Chandler 3 - Building 5  2305 South Ellis Street Chandler, AZ 85286 |
| | | Phoenix 1 - Chandler 4 - Building 1  2495 South Ellis Street Chandler, AZ 85286 |
| | | Phoenix 1 - Chandler 5 - Building 2  2405 South Ellis Street Chandler, AZ 85286 |
| | | Phoenix 2 - Chandler 6 - Building 8  2605 South Ellis Street Chandler, AZ 85286 |
| | | Phoenix 2 - Chandler 7 - Building 10 2705 South Ellis Street Chandler, AZ 85286 |
| | | Council Bluffs – 4700 Gifford Rd, Council Bluffs, IA 51501 |
| | | Chicago - Lombard - 1850 Springer Drive Lombard, IL |
| | | Chicago - Aurora I - 2905 Diehl Road Aurora, IL |
| | | Chicago - Aurora II - 2805 Diehl Road Aurora, IL |
| | | Florence 7190-7200 Industrial Road Florence, KY |
| | | Cincinnati - Mason - 4800 Parkway Drive Cincinnati, OH |

| | | Cincinnati - 7th Street I - 209 West Seventh Street Cincinnati, OH |
| | | Cincinnati - 7th Street II - 229 West Seventh Street Cincinnati, OH |
| | | Cincinnati - Hamilton - 103 Knightsbridge Drive Hamilton, OH |
| | | Cincinnati - North Cincinnati - 401 Kingsview Drive Lebanon, OH |
| | | Austin II - 7301 Metropolis Drive Austin, TX |
| | | Austin III - 7100 Metropolis Drive Austin, TX |
| | | Dallas - Carrollton - 1649 Frankford Road West Carrollton, TX |
| | | Dallas - Lewisville - 2501 South State Highway 121 Lewisville, TX |
| | | Dallas - Allen - 2300 Chelsea Blvd Allen, TX |
| | | Houston - Houston West I - 5150 Westway Park Boulevard Houston, TX |
| | | Houston - Houston West II - 5170 Westway Park Boulevard Houston, TX |
| | | Houston - Galleria - 4201-4211 Southwest Freeway Houston, TX |
| | | Houston - Houston West III - 11003 Corp Center Drive Houston, TX |
| | | San Antonio I - 9999 Westover Hills San Antonio, TX |
| | | San Antonio II - 9554 Westover Hills Blvd, San Antonio, TX, 78254 |
| | | San Antonio III - 9554 Westover Hills Blvd., Bldg. 2, San Antonio, TX, 78254 |
| | | San Antonio IV - 9554 Westover Hills Blvd., Bldg. 3, San Antonio, TX, 78254 |
| | | San Antonio V - 9999 Westover Hills San Antonio, TX |
| | | Northern Virginia - Sterling 1 - 21111 Ridgetop Circle Sterling, VA 20166 |
| | | Northern Virginia - Sterling 2 - 21111 Ridgetop Circle Sterling, VA 20166 |
| | | Northern Virginia - Sterling 3 - 21111 Ridgetop Circle Sterling, VA 20166 |
| | | Northern Virginia - Sterling 4 - 22811 Int'l Drive -Shaw Road, Sterling, VA 20166 |
| | | Northern Virginia - Sterling 5 - 21350 Pacific Boulevard, Sterling, VA 20166 |
| | | Northern Virginia - Sterling 6 - 21350 Pacific Boulevard, Sterling, VA 20166 |
| | | Northern Virginia - Sterling 8 - 45905 Maries Road, Sterling, VA 20166 |
| | | Northern Virginia – Sterling 9 - |

|  | 43290  Old Ox Road, VA 20166 |
|  | Raleigh-Durham I - 2223 NE Creek Pkwy Durham, NC |
|  | Norwalk I - 6 Norden Pl Norwalk, CT |
|  | Stamford - Riverbend - 10 Riverbend Dr S Stamford, CT |
|  | Wappingers Falls I - 155 Myers Corners Road Wappingers Falls, NY |
|  | Totowa - Madison - 50 Madison Road Totowa, NJ |
|  | Somerset I - 800 Cottontail Ln, Somerset, NJ 08873 |
|  | Frankfurt One - Leonhard Heißwolf Strasse 4, 65936 Frankfurt, Germany - Frankfurt, DE |
|  | Frankfurt Two - Leonhard Heißwolf Strasse 4, 65936 Frankfurt, Germany - Frankfurt, DE |
|  | Frankfurt Three - Wilhelm-Fay-Straße, 65936 Frankfurt am Main, Frankfurt, Germany |
|  | London One - 12 Liverpool Road, Slough Trading Estate, Slough, Berkshire, SL1 4QZ - London, UK |
|  | London Two - DC2 Prologis Park Heathrow, Stockley Road, West Drayton, UB7 9FN - London, UK |
|  | London Three -  700 Stirling Rd, Slough SL1 4ST, London, UK |
|  | Amsterdam I - Linieweg 1, 1165 AA Halfweg, Amsterdam, Netherlands |

### 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) |
|---|---|---|---|---|
| Not Applicable. | Not Applicable. | Not Applicable. | ☐ Yes   ☐ No | Not Applicable. |

## Part 2e. Description of Environment

| Provide a **_high-level_** description of the environment covered by this assessment. | CyrusOne provides colocation services to its clients. The entity is not responsible for the handling of systems within the cardholder data environments of their clients. This assessment is focused on physical security protections in their secure data center facilities. |
|---|---|
| *For example:*<br>• *Connections into and out of the cardholder data environment (CDE).*<br>• *Critical system components within the CDE, such as POS devices, databases, web servers, etc., and any other necessary payment components, as applicable.* | |

| Does your business use network segmentation to affect the scope of your PCI DSS environment?<br><br>*(Refer to "Network Segmentation" section of PCI DSS for guidance on network segmentation)* | ☐ Yes   ☒ No |
|---|---|

## 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:** |
|---|---|
| Not Applicable. | Not Applicable. |

***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: | Colocation Services |
| --- | --- |

| 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: | ☐ | ☐ | ☒ | Not Applicable. This requirement was not deemed within the scope of the assessment and was the responsibility of the entity's clients. |
| Requirement 2: | ☐ | ☐ | ☒ | Not Applicable. This requirement was not deemed within the scope of the assessment and was the responsibility of the entity's clients. |
| Requirement 3: | ☐ | ☒ | ☐ | 3.1 - 3.2.d Not Applicable. This requirement was not deemed within the scope of the assessment and was the responsibility of the entity's clients. 3.3 - 3.6 - Not Applicable. This requirement was not deemed within the scope of the assessment and was the responsibility of the entity's clients. |
| Requirement 4: | ☐ | ☐ | ☒ | Not Applicable. This requirement was not deemed within the scope of the assessment and was the responsibility of the entity's clients. |
| Requirement 5: | ☐ | ☐ | ☒ | Not Applicable. This requirement was not deemed within the scope of the assessment and was the responsibility of the entity's clients. |
| Requirement 6: | ☐ | ☐ | ☒ | Not Applicable. This requirement was not deemed within the scope of the assessment and was the responsibility of the entity's clients. |

| | | | | |
|---|---|---|---|---|
| Requirement 7: | ☐ | ☐ | ☒ | Not Applicable. This requirement was not deemed within the scope of the assessment and was the responsibility of the entity's clients. |
| Requirement 8: | ☐ | ☐ | ☒ | Not Applicable. This requirement was not deemed within the scope of the assessment and was the responsibility of the entity's clients. |
| Requirement 9: | ☐ | ☒ | ☐ | 9.5 - 9.8.2 - Not Applicable. This requirement was not deemed within the scope of the assessment and was the responsibility of the entity's clients.<br><br>9.9 - Not Applicable. The entity does not process, transmit, or store cardholder data. |
| Requirement 10: | ☐ | ☒ | ☐ | 10.1 - 10.7 - Not Applicable. This requirement was not deemed within the scope of the assessment and was the responsibility of the entity's clients. |
| Requirement 11: | ☐ | ☐ | ☒ | Not Applicable. This requirement was not deemed within the scope of the assessment and was the responsibility of the entity's clients. |
| Requirement 12: | ☐ | ☒ | ☐ | 12.3 - Not Applicable. This requirement was not deemed within the scope of the assessment and was the responsibility of the entity's clients.<br><br>12.5.5 - Not Applicable. This requirement was not deemed within the scope of the assessment and was the responsibility of the entity's clients.<br><br>12.8 – 12.8.2 - Not Applicable. The entity does not utilize nor permit any service providers that require access to the cardholder data environment.<br><br>12.8.4 – 12.8.5 - Not Applicable. The entity does not utilize nor permit any service providers that require access to the cardholder data environment.<br><br>12.10 - Not Applicable. This requirement was not deemed within the scope of the assessment and was the responsibility of the entity's clients. |
| Appendix A1: | ☐ | ☐ | ☒ | Not Applicable. The assessed entity is not a shared hosting provider. |
| Appendix A2: | ☐ | ☐ | ☒ | Not Applicable. This requirement was not deemed within the scope of the assessment and was the responsibility of the entity's clients. |

# Section 2: Report on Compliance

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

| | |
|---|---|
| The assessment documented in this attestation and in the ROC was completed on: | 14 August 2021 |
| Have compensating controls been used to meet any requirement in the ROC? | ☐ Yes ☒ No |
| Were any requirements in the ROC identified as being not applicable (N/A)? | ☒ Yes ☐ No |
| Were any requirements not tested? | ☐ Yes ☒ No |
| Were any requirements in the ROC unable to be met due to a legal constraint? | ☐ Yes ☒ No |

# Section 3: Validation and Attestation Details

## Part 3. PCI DSS Validation

**This AOC is based on results noted in the ROC dated 14 *August 2021.***

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):**

| | |
|---|---|
| ☒ | **Compliant:** All sections of the PCI DSS ROC are complete, all questions answered affirmatively, resulting in an overall **COMPLIANT** rating; thereby *CyrusOne* has demonstrated full compliance with the PCI DSS. |
| ☐ | **Non-Compliant:** Not all sections of the PCI DSS ROC are complete, or not all questions are answered affirmatively, resulting in an overall **NON-COMPLIANT** rating, thereby *(Service Provider Company Name)* has not demonstrated full compliance with the PCI DSS. <br><br> **Target Date** for Compliance: <br><br> 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. *Check with the payment brand(s) before completing Part 4.* |
| ☐ | **Compliant but with Legal exception:** One or more requirements are marked "Not in Place" due to a legal restriction that prevents the requirement from being met. This option requires additional review from acquirer or payment brand. <br><br> *If checked, complete the following:* |

| Affected Requirement | Details of how legal constraint prevents requirement being met |
|---|---|
| | |
| | |

## Part 3a. Acknowledgement of Status

**Signatory(s) confirms:**

*(Check all that apply)*

| | |
|---|---|
| ☒ | The ROC was completed according to the *PCI DSS Requirements and Security Assessment Procedures*, Version *3.2.1*, and was completed according to the instructions therein. |
| ☒ | All information within the above-referenced ROC and in this attestation fairly represents the results of my assessment in all material respects. |
| ☐ | I have confirmed with my payment application vendor that my payment system does not store sensitive authentication data after authorization. |
| ☒ | I have read the PCI DSS and I recognize that I must maintain PCI DSS compliance, as applicable to my environment, at all times. |
| ☒ | If my environment changes, I recognize I must reassess my environment and implement any additional PCI DSS requirements that apply. |

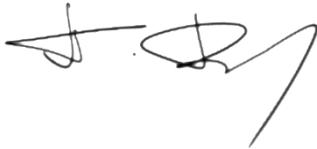| | |
|---|---|
| **Part 3a. Acknowledgement of Status** (continued) | |
| ☒ | No evidence of full track data[1], CAV2, CVC2, CID, or CVV2 data[2], or PIN data[3] storage after transaction authorization was found on ANY system reviewed during this assessment. |
| ☐ | ASV scans are being completed by the PCI SSC Approved Scanning Vendor. |

### Part 3b. Service Provider Attestation

Robert Crespi    Digitally signed by Robert Crespi
Date: 2021.08.14 13:14:36 -05'00'

| | |
|---|---|
| *Signature of Service Provider Executive Officer* ↑ | *Date:* 14 August 2021 |
| *Service Provider Executive Officer Name:* Robert Crespi | *Title:* Vice President Managed Services/Interim CIO |

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

| | |
|---|---|
| If a QSA was involved or assisted with this assessment, describe the role performed: | The assessor provided PCI DSS advisory and assessment services, which included observation of controls, interviews with key personnel, and review of policies and procedures. |

| | |
|---|---|
| *Signature of Duly Authorized Officer of QSA Company* ↑ | *Date: 14 August 2021* |
| *Duly Authorized Officer Name:* Petar Besalev<br>Senior VP Cybersecurity and Privacy Services | *QSA Company:* A-LIGN |

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

| | |
|---|---|
| If an ISA(s) was involved or assisted with this assessment, identify the ISA personnel and describe the role performed: | Not Applicable. |

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[1]  Data encoded in the magnetic stripe or equivalent data on a chip used for authorization during a card-present transaction. Entities may not retain full track data after transaction authorization. The only elements of track data that may be retained are primary account number (PAN), expiration date, and cardholder name.

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

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

## Part 4. Action Plan for Non-Compliant Requirements

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

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

| PCI DSS Requirement | Description of Requirement | Compliant to PCI DSS Requirements *(Select One)* | | Remediation Date and Actions (If "NO" selected for any Requirement) |
|---|---|---|---|---|
| | | YES | NO | |
| 1 | Install and maintain a firewall configuration to protect cardholder data | ☐ | ☐ | Not Applicable. |
| 2 | Do not use vendor-supplied defaults for system passwords and other security parameters | ☐ | ☐ | Not Applicable. |
| 3 | Protect stored cardholder data | ☒ | ☐ | |
| 4 | Encrypt transmission of cardholder data across open, public networks | ☐ | ☐ | Not Applicable. |
| 5 | Protect all systems against malware and regularly update anti-virus software or programs | ☐ | ☐ | Not Applicable. |
| 6 | Develop and maintain secure systems and applications | ☐ | ☐ | Not Applicable. |
| 7 | Restrict access to cardholder data by business need to know | ☐ | ☐ | Not Applicable. |
| 8 | Identify and authenticate access to system components | ☐ | ☐ | Not Applicable. |
| 9 | Restrict physical access to cardholder data | ☒ | ☐ | |
| 10 | Track and monitor all access to network resources and cardholder data | ☒ | ☐ | |
| 11 | Regularly test security systems and processes | ☐ | ☐ | Not Applicable. |
| 12 | Maintain a policy that addresses information security for all personnel | ☒ | ☐ | |
| Appendix A1 | Additional PCI DSS Requirements for Shared Hosting Providers | ☐ | ☐ | Not Applicable. |
| Appendix A2 | Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections | ☐ | ☐ | Not Applicable. |