

Payment Card Industry (PCI) Data Security Standard

Attestation of Compliance for Onsite Assessments – Service Providers

Version 3.2.1

June 2018



Section 1: Assessment Information

Instructions for Submission

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

Part 1. Service Provider and Qualified Security Assessor Information							
Part 1a. Service Provider Organization Information							
Company Name:	Genpact Wilkes B	arre	DBA (doing business as):				
Contact Name:	Sandeep Srivasta	va	Title:	Assistant Information		resident – urity	
Telephone:	+919643807147		E-mail:	Sandeep.	Srivast	tava2@gen	
Business Address:	335 New Comme	rce Blvd	City:	Wilkes Ba	rre		
State/Province:	Pennsylvania Country:		USA		Zip:	18706	
URL:	https://www.genpact.com						

Part 1b. Qualified Security Assessor Company Information (if applicable)						
Company Name:	ControlCase LLC	ControlCase LLC				
Lead QSA Contact Name:	Kamlesh Naidu		Title:	PCI QSA	PCI QSA	
Telephone:	+1 703.483.6383		E-mail:	knaidu@co	knaidu@controlcase.com	
Business Address:	12015 Lee Jackso Memorial Hwy, Su		City:	Fairfax		
State/Province:	VA Country:		USA		Zip:	22033
URL:	https://www.controlcase.com					



Part 2. Executive Summary	/						
Part 2a. Scope Verification							
Services that were INCLUDE	ED in the scope of the PCI DSS Ass	sessment (check all that apply):					
Name of service(s) assessed:	ame of service(s) assessed: Genpact Wilkes Barre Process provides support services to AFL, Penske, Ralph Lauren, Abbott, Audacy for processes handling CHD data at Wilkes Barre location.						
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): Business Process Service							
an entity's service description. If yo	ed for assistance only, and are not inte ou feel these categories don't apply to y a category could apply to your service,	our service, complete					



Part 2a. Scope Verification (continued)						
Services that are provided by the PCI DSS Assessment (ch		der but were NC	OT INCLUDED in the scope of			
Name of service(s) not assessed:	None					
Type of service(s) not assessed:						
Hosting Provider: Applications / software Hardware Infrastructure / Network Physical space (co-location) Storage Web Security services 3-D Secure Hosting Provider Shared Hosting Provider Other Hosting (specify):	Managed Services Systems securit IT support Physical securit Terminal Manag Other services (y services y gement System	Payment Processing: POS / card present Internet / e-commerce MOTO / Call Center ATM Other processing (specify):			
Account Management	☐ Fraud and Chargeback ☐ Payment Gateway/Switch					
☐ Back-Office Services	☐ Issuer Processi	ng	☐ Prepaid Services			
Billing Management	☐ Loyalty Program	าร	Records Management			
Clearing and Settlement	☐ Merchant Service	ces	☐ Tax/Government Payments			
☐ Network Provider						
Others (specify):						
Provide a brief explanation why ar were not included in the assessment	-					
Part 2b. Description of Paym	ent Card Busines	S				
Describe how and in what capacity your business stores, processes, and/or transmits cardholder data.		services to AFI	Barre Process provides support , Penske, Ralph Lauren, Abbott, esses handling CHD data at Wilkes			
		•	Barre supports various lines of ne following customers:			
		Penske				
		Ralph Lauren				
		AFL				
		Audacy				
		Abbott				
		Penske				
		Process				
		1 100533				



Genpact agents handle inbound calling of Customer Payments for Penske.

Customer calls Genpact Analyst to make payment on their account.

Analyst enters credit card information into Rental Net (Penske Payment Portal).

If a receipt is required by the customer, it is emailed to them, only last 4 digits of CC are visible.

Genpact agents also perform outbound calling to existing Rental and Lease customers as part of collections process.

Genpact agents also perform outbound calling to late stage accounts assignments as part of collections process. Call recording is not performed.

Storage

There is no storage of cardholder data for Penske process.

Transmission

Genpact connects to Penske via IPSEC VPN over Internet channel.

Ralph Lauren

Process

Genpact analyst handle out/inbound calling of Customer Payments for Ralph Lauren.

Customer calls Genpact Analyst to make payment on their account.

Analyst enters credit card information (PAN, Type of CC, Name on Card, Expiry Date) into Payeezy (Customer Payment Portal for USA) (https://globalgatewaye4.firstdata.com/) and Bambora

(https://web.na.bambora.com/admin/sDefault.asp) (Customer Payment Portal for Canada) (CVV is required for Canada and is not required for USA)

If a receipt is required by the customer, it is emailed, only last 4 digits of CC are visible.

No Calls are recorded in Genpact for Ralph Lauren process.

Storage

There is no storage of cardholder data for Ralph Lauren process.



Transmission

Genpact agent connect to Genpact VPN over SSL VPN with TLS 1.2 AES encryption.

Genpact agents use Link (https://globalgatewaye4.firstdata.com/ and https://web.na.bambora.com/admin/sDefault.asp) provided by Ralph Lauren over Internet channel for customer payments.

AFL

Process

Genpact agents handle inbound calling of Customer Payments for AFL.

Genpact Analyst apply payment to which invoices using Cardholder Data (PAN, Name, Expiry Date) provided by customer.

Cardholder Data (PAN, Name, Expiry Date) is entered https://cardpointe.cardconnect.com by Genpact analyst.

Storage

There is no storage of cardholder data for AFL process.

Transmission

Genpact connects to AFL over IPSEC VPN Channel.

Genpact agent connect to Genpact VPN over SSL VPN with TLS 1.2 AES encryption.

Genpact agents connect to https://cardpointe.cardconnect.com for Payment completions for AFL process.

Audacy

Process

Genpact agents handle inbound and outbound calls along with Emails while supporting Audacyfor Collections process.

Genpact analyst will need to login into Audacy managed remote environment with to perform Collection process.

While handling inbound calls, Customers with preexisting balances call in to the analysts to make payments. Genpact analysts log in to payment portal and asks customer to provided cardholder data (PAN, Exp date, Cardholder Name) and performs the



payment. Genpact analyst can view only last 4 digits of PAN after payment has been completed.

While handling outbound calls, List generated out of Genpact Cora on outstanding balances. Analyst makes call to customer. Genpact analysts log in to payment portal and asks customer to provided cardholder data (PAN, Exp date, Cardholder Name) and performs the payment. Genpact analyst can view only last 4 digits of PAN after payment has been completed.

While handling emails, Genpact receives emails from customers containing Credit Card Authorization forms which has cardholder data information (Full PAN, Expiry, Name) and customer signature (auth purposes). Genpact analysts log in to payment portal and performs the payment with cardholder data provided by customer. Genpact analyst can view only last 4 digits of PAN after payment has been completed.

Storage

There is no storage of cardholder data for Audacyprocess.

Transmission

Genpact connects to Audacy over IPSEC VPN Channel and via MPLS Channel.

Abbott

There is no storage processing or transmission of Cardholder data.

Genpact also provides work from home for above mentioned processes. Users connect to Genpact environment using Genpact remote VPN. Users then login Genpact Citrix and provide the payment support services mentioned above. SoftPhones are accessed from Genpact User workstation and payment is performed using Internet Browser application from Citrix.

The assessor noted that all applications and tools used to process, host card information are hosted in client environment or managed by client. The assessor noted that no Genpact owned, managed or hosted tools applications are used for hosting or processing CHD information. No CHD information is stored at Genpact as part of Genpact Wilkes Barre



process. However, Genpact agents have access to client information and can view cardholder data (PAN, Cardholder Name, CVV and Expiry) on client-hosted applications and this is considered as transmission of cardholder data.

Genpact only provides the agents with workstation access and network connectivity to AFL, Penske, Ralph Lauren, Abbott, Audacy managed applications.

Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data. Genpact provides business process service to AFL, Penske, Ralph Lauren, Abbott, Audacyfor supporting their processes which involve cardholder data.

Genpact does not store cardholder data for Genpact Wilkes Barres processes.

Genpact agents use Link (https://globalgatewaye4.firstdata.com/ and https://web.na.bambora.com/admin/sDefault.asp) provided by Ralph Lauren over Internet channel for customer payments.

Genpact agents connect to https://cardpointe.cardconnect.com for Payment completions for AFL process.

Genpact connects to AFL over IPSEC VPN Channel.

Genpact connects to Penske via IPSEC VPN over Internet channel.

Genpact connects to Audacyover IPSEC VPN Channel and via MPLS Channel.

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
Process Floors	1	Genpact Wilkes Barre, 335 New Commerce Blvd, Wilkes Barre, PA 18706
Data Center	1	Genpact Wilkes Barre, 335 New Commerce Blvd, Wilkes Barre, PA 18706
AWS Cloud	1	Mumbai-India
Azure Cloud	1	India



Part 2d. Payment Applications								
Does the organization use one or more Payment Applications? ☐ Yes ☒ No								
Provide the following infor	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)				
			☐ Yes ⊠ No					

Part 2e. Description of Environment

Provide a <u>high-level</u> 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 POS devices, databases, web servers, etc., and any other necessary payment components, as applicable.

The covered infrastructure for Genpact Wilkes Barre certification includes following:

- MPLS Links for Genpact Backbone connectivity
- Network Components like Palo Alto Firewall and IPS, Cisco Switch, Cisco Internal Router, Cisco MPLS Router, Cisco VPN Router, Cisco VPN Firewall
- Windows Servers like Domain Controller, Patch, Antivirus, File Server
- Citrix Systems like NetScaler
- QRadar SIEM
- Agent Workstations
- Genpact connectivity to Audacy, Abbott over MPLS channel.
- Genpact connectivity to Penske, Audacy over IPSEC VPN channel.
- Genpact Remote VPN Connectivity over SSL VPN for AFL and Ralph Lauren Process

The assessor noted that few services used by Genpact Wilkes Barre environment is covered under other Genpact PCI-DSS AOCs.

Genpact Certificatio	-	
for		
TACACS		
NTP Server	s	
IBM Qradar		

Genpact CWT-WFH SAQ-D dated 31 July 2020 for



	CrowdStrike Antivirus	
	Genpact NAB PCI-DSS Cedated 19 April 2021. for Domain controller OKTA Server Databank Holdings, LLC. AOC Oct 2020 Location	
	400 S Akard Street Dallas, TX 7	5202
	Data Center Physical Security	
	CyrusOne LLC AOC dated 1 2020 Location 209 7th Street West, Cincinnati,	
	Data Center Physical Security	011 10202
	, ,	
	AWS hosting provider AOC December 2020	dated 14
	Zone Locations	
	Mumbai-India	
	Azure hosting provider AOC May 2021	dated 3
	Zone Locations	
	India	
Does your business use network segmentation tenvironment? (Refer to "Network Segmentation" section of PC segmentation)		Yes 🗌 No
· · · · · · · · · · · · · · · · · · ·		
Part 2f. Third-Party Service Providers		
Does your company have a relationship with a C the purpose of the services being validated?	ualified Integrator & Reseller (QIR) for	Yes 🛭 No
If Yes:		
Name of QIR Company:		
,		



QIR Individual Name:					
Description of services provided	by QIR:				
example, Qualified Integrator Re	esellers (QIR), g osting companie	e or more third-party service providers (for ateways, payment processors, payment s, airline booking agents, loyalty program ng validated?	⊠ Yes □ No		
If Yes:					
Name of service provider:	Description o	f services provided:			
DataBank Holdings	Third Party Da	ta Center			
CyrusOne LLC	Third Party Da	ta Center			
Azure	Manage Hostir	ng Provider			
Amazon Web Services	Manage Hosting Provider				
CrowdStrike	Managed Serv	ice Provider			
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 A	Genpact Business Process Service for AFL, Penske, Ralph Lauren, Abbott, Audacy				
			Detail	s of Requirements Assessed	
				Justification for Approach	
PCI DSS Requirement	Full	Partial	None	(Required for all "Partial" and "None" responses. Identify which sub-requirements were not tested and the reason.)	
Requirement 1:				1.2.3: Wireless Network is not being used in Genpact Wilkes Barre environment. Hence this control is not applicable.	
				1.3.1: There is no DMZ interface implemented for Genpact Wilkes Barre Environment. Hence this control is not applicable.	
				1.3.2: There is no DMZ interface implemented for Genpact Wilkes Barre. Hence this control is not applicable.	
				1.3.6: There is no cardholder data storage in Genpact Wilkes Barre environment. Hence this control is not applicable.	
Requirement 2:				2.1.1: Wireless Network is not being used in Genpact Wilkes Barre environment. Hence this control is not applicable.	
				2.2.3: There are no insecure services present in Genpact Wilkes Barre environment. Hence this control is not applicable.	
				2.6: Genpact Wilkes Barre is not providing any shared hosting services. Hence this control is not applicable.	
Requirement 3:				3.1, 3.4, 3.4.1, 3.5, 3.5.1, 3.5.2, 3.5.3, 3.5.4, 3.6, 3.6.1, 3.6.2, 3.6.3, 3.6.4, 3.6.5, 3.6.6, 3.6.7, 3.6.8: Genpact Wilkes Barre environment does not store cardholder data. Hence these controls are not applicable.	



		 3.2: Genpact Wilkes Barre environment is neither an issuer nor does it support issuing services and also, does not receive sensitive authentication data. Hence, this control is not applicable. 3.3: Genpact agents cannot view full or masked PAN in Genpact Wilkes Barre environment. Hence this control is not applicable.
Requirement 4:		4.1.1: Wireless Network is not being used in Genpact Wilkes Barre environment. Hence this control is not applicable. 4.2 - Cardholder data is not being transmitted over end user messaging services. Hence this control is not applicable.
Requirement 5:		5.1.2- Genpact Wikes Barre does not have any systems which are not considered commonly affected by malicious software. Hence, this control is not Applicable.
Requirement 6:		6.3, 6.3.1, 6.3.2, 6.4, 6.4.1, 6.4.2, 6.4.3, 6.4.4, 6.5, 6.5.1, 6.5.2, 6.5.3, 6.5.4, 6.5.5, 6.5.6, 6.5.7, 6.5.8, 6.5.9, 6.5.10: Genpact Wilkes Barre environment does not perform any in-house Software or Application development or host any application in its environment. Hence these controls are not applicable.
		 6.4.6: No significant change occurred in Genpact Wilkes Barre environment within the past 12 months. Hence this control is not applicable. 6.6: No internet facing application is hosted in Genpact Wilkes Barre environment. Hence this control is not applicable.
Requirement 7:		
Requirement 8:		8.1.5: No remote access is provided to the vendors in Genpact Wilkes Barre environment. Hence this control is not applicable.
		8.3.1: There is no non-console administrative access allowed into CDE of Genpact Wilkes Barre environment. Hence this control is not applicable. 8.5.1: Genpact Wilkes Barre environment does not have remote access to customer premises. Hence this control is not applicable. 8.7: Genpact Wilkes Barre environment does not host any databases which is storing cardholder data. Hence this control is not applicable.
Requirement 9:		9.5, 9.5.1, 9.6, 9.6.1, 9.6.2, 9.6.3, 9.7, 9.7.1, 9.8.2: Cardholder data is not backed-up in external electronic media or tapes as part of Genpact Wilkes Barre environment. Hence these controls are not applicable.
		9.8, 9.8.1: Genpact Wilkes Barre doesn't have hard copies consisting PAN which need to be crosscut shredded, incinerated, or pulped. Hence these controls are not applicable.



	 1		
			9.9, 9.9.1, 9.9.2, 9.9.3: Card-present channel is not available in Genpact Wilkes Barre environment. There are no physical interaction devices capturing cardholder data in Genpact Wilkes Barre environment. Hence these controls are not applicable.
Requirement 10:			10.2.1: Genpact Wilkes Barre environment does not store cardholder data. Hence this control is not applicable.
Requirement 11:			11.1.1: Wireless Network is not being used in Genpact Wilkes Barre environment. Hence this control is not applicable.
			11.2.3: There was no major or significant change in Genpact Wilkes Barre environment during the past one year. Hence this control is not applicable.
			11.3.3: Exploitable vulnerabilities are not found during penetration testing in Genpact Wilkes Barre environment. Hence this control is not applicable.
Requirement 12:	\boxtimes		12.3.9: Genpact Wilkes Barre environment does not provide remote access to vendors and business partners. Hence this control is not applicable.
Appendix A1:			Genpact Wilkes Barre environment is not a shared hosting provider. Hence all controls are not applicable.
Appendix A2:		\boxtimes	A2: Genpact Wilkes Barre environment does not have any POS/POI Terminal. Hence this control is not applicable.
			A2.2: Genpact Wilkes Barre environment does not use SSL or early TLS version. Hence this control is not applicable.
			A2.3: Genpact Wilkes Barre environment does not have any insecure service in environment. Hence this control is not applicable.



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:	July 12, 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 July 12, 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*):

	·	mpliant: All sections of the PCI DSS ROC are complete, all questions answered affirmatively, ulting in an overall COMPLIANT rating; thereby Genpact Wilkes Barre has demonstrated full impliance 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.						
	Target Date for Compliance:						
An entity submitting this form with a status of Non-Compliant may be required to complete the Plan in Part 4 of this document. Check with the payment brand(s) before completing Part 4.							
	Affected Requirement	Details of how legal constraint prevents requirement being met					

Part 3a. Acknowledgement of Status Signatory(s) confirms: (Check all that apply) \boxtimes 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. \boxtimes 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. \boxtimes I have read the PCI DSS and I recognize that I must maintain PCI DSS compliance, as applicable to my environment, at all times. \boxtimes If my environment changes, I recognize I must reassess my environment and implement any additional PCI DSS requirements that apply.



Part 3a. Acknowledgement of Status (continued)

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

Part 3b. Service Provider Attestation

Signature of Service Provider Executive Officer ↑	Date: July 12, 2021
Service Provider Executive Officer Name: Vidya Srinivasan	Title: Senior Vice President – Infrastructure, Enterprise Risk and Global Mobility

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

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

The QSA performed the assessment against the PCI DSS 3.2.1 standard at the assessed entity and documented the findings in the report on compliance.

Signature of Duly Authorized Officer of QSA Company ↑Date: July 12, 2021Duly Authorized Officer Name: Kamlesh NaiduQSA Company: ControlCase LLC

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:

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.

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
		YES	NO	Requirement)
1	Install and maintain a firewall configuration to protect cardholder data			
2	Do not use vendor-supplied defaults for system passwords and other security parameters	\boxtimes		
3	Protect stored cardholder data			
4	Encrypt transmission of cardholder data across open, public networks	\boxtimes		
5	Protect all systems against malware and regularly update anti-virus software or programs			
6	Develop and maintain secure systems and applications	\boxtimes		
7	Restrict access to cardholder data by business need to know			
8	Identify and authenticate access to system components			
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			
12	Maintain a policy that addresses information security for all personnel	\boxtimes		
Appendix A1	Additional PCI DSS Requirements for Shared Hosting Providers	\boxtimes		
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections	\boxtimes		









