

Payment Card Industry (PCI) Data Security Standard Self-Assessment Questionnaire A and Attestation of Compliance

All cardholder data functions outsourced. No Electronic Storage, Processing, or Transmission of Cardholder Data

Version 2.0

October 2010



Document Changes

Date	Version	Description
October 1, 2008	1.2	To align content with new PCI DSS v1.2 and to implement minor changes noted since original v1.1.
October 28, 2010	2.0	To align content with new PCI DSS v2.0 requirements and testing procedures.



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PCI Data Security Standard: Related Documents

The following documents were created to assist merchants and service providers in understanding the PCI Data Security Standard and the PCI DSS SAQ.

Document	Audience
PCI Data Security Standard: Requirements and Security Assessment Procedures	All merchants and service providers
Navigating PCI DSS: Understanding the Intent of the Requirements	All merchants and service providers
PCI Data Security Standard: Self-Assessment Guidelines and Instructions	All merchants and service providers
PCI Data Security Standard: Self-Assessment Questionnaire A and Attestation	Eligible merchants ¹
PCI Data Security Standard: Self-Assessment Questionnaire B and Attestation	Eligible merchants ¹
PCI Data Security Standard: Self-Assessment Questionnaire C-VT and Attestation	Eligible merchants ¹
PCI Data Security Standard: Self-Assessment Questionnaire C and Attestation	Eligible merchants ¹
PCI Data Security Standard: Self-Assessment Questionnaire D and Attestation	Eligible merchants and service providers ¹
PCI Data Security Standard and Payment Application Data Security Standard: Glossary of Terms, Abbreviations, and Acronyms	All merchants and service providers

To determine the appropriate Self-Assessment Questionnaire, see *PCI Data Security Standard: Self-Assessment Guidelines and Instructions*, "Selecting the SAQ and Attestation That Best Apply to Your Organization."



Before you Begin

Completing the Self-Assessment Questionnaire

SAQ A has been developed to address requirements applicable to merchants who retain only paper reports or receipts with cardholder data, do not store cardholder data in electronic format and do not process or transmit any cardholder data on their systems or premises.

SAQ A merchants, defined here and in the *PCI DSS Self-Assessment Questionnaire Instructions and Guidelines*, do not store cardholder data in electronic format and do not process or transmit any cardholder data on their systems or premises. Such merchants validate compliance by completing SAQ A and the associated Attestation of Compliance, confirming that:

- Your company handles only card-not-present (e-commerce or mail/telephone-order) transactions;
- Your company does not store, process, or transmit any cardholder data on your systems or premises, but relies entirely on third party service provider(s) to handle all these functions;
- Your company has confirmed that the third party(s) handling storage, processing, and/or transmission of cardholder data is PCI DSS compliant;
- Your company retains only paper reports or receipts with cardholder data, and these documents are not received electronically; and
- Your company does not store any cardholder data in electronic format.

This option would never apply to merchants with a face-to-face POS environment.

Each section of the questionnaire focuses on a specific area of security, based on the requirements in the *PCI DSS Requirements and Security Assessment Procedures*. This shortened version of the SAQ includes questions which apply to a specific type of small merchant environment, as defined in the above eligibility criteria. If there are PCI DSS requirements applicable to your environment which are not covered in this SAQ, it may be an indication that this SAQ is not suitable for your environment. Additionally, you must still comply with all applicable PCI DSS requirements in order to be PCI DSS compliant.

PCI DSS Compliance - Completion Steps

- 1. Assess your environment for compliance with the PCI DSS.
- 2. Complete the Self-Assessment Questionnaire (SAQ A) according to the instructions in the Self-Assessment Questionnaire Instructions and Guidelines.
- 3. Complete the Attestation of Compliance in its entirety.
- 4. Submit the SAQ and the Attestation of Compliance, along with any other requested documentation, to your acquirer.

Guidance for Non-Applicability of Certain, Specific Requirements

Non-Applicability: Requirements deemed not applicable to your environment must be indicated with "N/A" in the "Special" column of the SAQ. Accordingly, complete the "Explanation of Non-Applicability" worksheet in Appendix D for each "N/A" entry.



Attestation of Compliance, SAQ A

Instructions for Submission

The merchant must complete this Attestation of Compliance as a declaration of the merchant's compliance status with the *Payment Card Industry Data Security Standard (PCI DSS) Requirements and Security Assessment Procedures.* Complete all applicable sections and refer to the submission instructions at "PCI DSS Compliance – Completion Steps" in this document.

Part 1. Merchant and Qualified Security Assessor Information Part 1a. Merchant Organization Information							
Company Name:	Parcel Forecast, LLC		DBA(S):				
Contact Name:	Sean Conner		Title:	СТО			
Telephone:	(206) 291-8173		E-mail:	sean@parcast.	com		
Business Address:	1201 Alaskan Way, Suit	e 200	City:	Seattle			
State/Province:	WA		Country:	USA	ZIP:	98101	
URL:	http://parcast.com						
Part 1b. Qualified	Security Assessor Co	ompany In	formation	n (if applicable)		
Company Name:							
Lead QSA Contact Name:			Title:				
Telephone:			E-mail:				
Business Address:			City:				
State/Province:			Country:		ZIP:		
URL:							
Part 2. Type of me	erchant business (c	heck all t	hat apply	y):			
☐ Retailer ☐ To	elecommunication	Grocery and	d Supermai	rkets			
Petroleum E-Hosted E-Business	-Commerce \square	Mail/Telepho	one-Order	⊠ Othe	rs (pleas	e specify):	Cloud
List facilities and locations included in PCI DSS review: www.parcast.com, 1201 Alaskan Way, Suite 200, Seattle, WA 98101							
Part 2a. Relations	hips						
	ave a relationship with c g companies, airline boo					⊠ Yes □] No
Does your company h	ave a relationship with r	nore than o	ne acquire	r?		☐ Yes ⊠] No



Pai	rt 2b. Eligibility to Complete SAQ A				
Merch	nant certifies eligibility to complete this shortened version of the	Self-Assessment Questionnaire because:			
	Merchant does not store, process, or transmit any cardholder data on merchant systems or premises but relies entirely on third party service provider(s) to handle these functions;				
\boxtimes	The third party service provider(s) handling storage, processing, and/or transmission of cardholder data is confirmed to be PCI DSS compliant;				
\boxtimes	Merchant does not store any cardholder data in electronic form	mat; and			
	If Merchant does store cardholder data, such data is only in pareceived electronically.	aper reports or copies of receipts and is not			
Part	3. PCI DSS Validation				
	on the results noted in the SAQ A dated 01/18/2012, Parcel For (check one):	recast, LLC asserts the following compliance			
	Compliant: All sections of the PCI SAQ are complete, and all q				
	 Non-Compliant: Not all sections of the PCI SAQ are complete, or some questions are answered "no," resulting in an overall NON-COMPLIANT rating, thereby (Merchant 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 Action Plan in Part 4 of this document. Check with your acquirer or the payment brand(s) before completing Part 4, since not all payment brands require this section. 				
Dai	rt 3a. Confirmation of Compliant Status				
	hant confirms:				
	PCI DSS Self-Assessment Questionnaire A, Version 2, was co	ompleted according to the instructions therein.			
\boxtimes	All information within the above-referenced SAQ and in this at assessment.	testation fairly represents the results of my			
\boxtimes	I have read the PCI DSS and I recognize that I must maintain	full PCI DSS compliance at all times.			
Pai	rt 3b. Merchant Acknowledgement				
	e C	01/18/2012			
Sign	ature of Merchant Executive Officer ↑	Date ↑			
Sear	n Conner	Co-Founder & CTO			
Merc	chant Executive Officer Name 个	Title ↑			
Parc	Parcel Forecast, LLC				
Merc	chant Company Represented ↑				



Part 4. Action Plan for Non-Compliant Status

Please select the appropriate "Compliance Status" for each requirement. If you answer "NO" to any of the requirements, you are required to provide the date Company will be compliant with the requirement and a brief description of the actions being taken to meet the requirement. Check with your acquirer or the payment brand(s) before completing Part 4, since not all payment brands require this section.

DCI DCC		Compliand (Select		Bown disting Date and Astignation	
PCI DSS Requirement	Description of Requirement	YES	NO	Remediation Date and Actions (if Compliance Status is "NO")	
9	Restrict physical access to cardholder data				
12	Maintain a policy that addresses information security for all personnel				



Self-Assessment Questionnaire A

Note: The following questions are numbered according to PCI DSS requirements and testing procedures, as defined in the PCI DSS Requirements and Security Assessment Procedures document.

Date of Completion: 01/18/2012

Implement Strong Access Control Measures

Requirement 9: Restrict physical access to cardholder data

	PC	I DSS Question	Response:	Yes	No	Special·
9.6	compo and fa	,	aper reports,			
	For purposes of Requirement 9, "media" refers to all paper and electronic media containing cardholder data.					
9.7	(a) Is strict control maintained over the internal or external distribution of any kind of media?					
	(b) D	o controls include the following:				
	9.7.1	Is media classified so the sensitivity of the data cadetermined?	an be			
	9.7.2	Is media sent by secured courier or other delivery can be accurately tracked?	method that			
9.8	Are logs maintained to track all media that is moved from a secured area, and is management approval obtained prior to moving the media (especially when media is distributed to individuals)?					
9.9	Is strict control maintained over the storage and accessibility of media?					
9.10		nedia destroyed when it is no longer needed for bus reasons?	iness or			
	Is des	truction performed as follows:				
	9.10.1	(a) Are hardcopy materials cross-cut shredded, in or pulped so that cardholder data cannot be reconstructed?	ncinerated,			
		(b) Are containers that store information to be de secured to prevent access to the contents? (F a "to-be-shredded" container has a lock prevent access to its contents.)	or example,			

^{* &}quot;Not Applicable" (N/A) or "Compensating Control Used." Organizations using this section must complete the Compensating Control Worksheet or Explanation of Non-Applicability Worksheet, as appropriate, in the Appendix.



Maintain an Information Security Policy

Requirement 12: Maintain a policy that addresses information security for all personnel

	PC	I DSS Question	Response:	Yes	<u>No</u>	Special·
12.8	12.8 If cardholder data is shared with service providers, are policies and procedures maintained and implemented to manage service providers, as follows?					
	12.8.1	Is a list of service providers maintained?		\boxtimes		
	12.8.2	Is a written agreement maintained that includes ar acknowledgement that the service providers are refor the security of cardholder data the service provpossess?	esponsible			
	12.8.3	Is there an established process for engaging servi providers, including proper due diligence prior to engagement?	ce			
	12.8.4	Is a program maintained to monitor service provid DSS compliance status?	ers' PCI	\boxtimes		

^{* &}quot;Not Applicable" (N/A) or "Compensating Control Used." Organizations using this section must complete the Compensating Control Worksheet or Explanation of Non-Applicability Worksheet, as appropriate, in the Appendix.



Appendix A: (not used)

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Appendix B: Compensating Controls

Compensating controls may be considered for most PCI DSS requirements when an entity cannot meet a requirement explicitly as stated, due to legitimate technical or documented business constraints, but has sufficiently mitigated the risk associated with the requirement through implementation of other, or compensating, controls.

Compensating controls must satisfy the following criteria:

- 1. Meet the intent and rigor of the original PCI DSS requirement.
- 2. Provide a similar level of defense as the original PCI DSS requirement, such that the compensating control sufficiently offsets the risk that the original PCI DSS requirement was designed to defend against. (See *Navigating PCI DSS* for the intent of each PCI DSS requirement.)
- 3. Be "above and beyond" other PCI DSS requirements. (Simply being in compliance with other PCI DSS requirements is not a compensating control.)

When evaluating "above and beyond" for compensating controls, consider the following:

Note: The items at a) through c) below are intended as examples only. All compensating controls must be reviewed and validated for sufficiency by the assessor who conducts the PCI DSS review. The effectiveness of a compensating control is dependent on the specifics of the environment in which the control is implemented, the surrounding security controls, and the configuration of the control. Companies should be aware that a particular compensating control will not be effective in all environments.

- a) Existing PCI DSS requirements CANNOT be considered as compensating controls if they are already required for the item under review. For example, passwords for non-console administrative access must be sent encrypted to mitigate the risk of intercepting clear-text administrative passwords. An entity cannot use other PCI DSS password requirements (intruder lockout, complex passwords, etc.) to compensate for lack of encrypted passwords, since those other password requirements do not mitigate the risk of interception of clear-text passwords. Also, the other password controls are already PCI DSS requirements for the item under review (passwords).
- b) Existing PCI DSS requirements MAY be considered as compensating controls if they are required for another area, but are not required for the item under review. For example, two-factor authentication is a PCI DSS requirement for remote access. Two-factor authentication from within the internal network can also be considered as a compensating control for non-console administrative access when transmission of encrypted passwords cannot be supported. Two-factor authentication may be an acceptable compensating control if; (1) it meets the intent of the original requirement by addressing the risk of intercepting clear-text administrative passwords; and (2) it is set up properly and in a secure environment.
- c) Existing PCI DSS requirements may be combined with new controls to become a compensating control. For example, if a company is unable to render cardholder data unreadable per requirement 3.4 (for example, by encryption), a compensating control could consist of a device or combination of devices, applications, and controls that address all of the following: (1) internal network segmentation; (2) IP address or MAC address filtering; and (3) two-factor authentication from within the internal network.
- 4. Be commensurate with the additional risk imposed by not adhering to the PCI DSS requirement.

The assessor is required to thoroughly evaluate compensating controls during each annual PCI DSS assessment to validate that each compensating control adequately addresses the risk the original PCI DSS requirement was designed to address, per items 1-4 above. To maintain compliance, processes and controls must be in place to ensure compensating controls remain effective after the assessment is complete.



Appendix C: Compensating Controls Worksheet

Use this worksheet to define compensating controls for any requirement where "YES" was checked and compensating controls were mentioned in the "Special" column.

Note: Only companies that have undertaken a risk analysis and have legitimate technological or documented business constraints can consider the use of compensating controls to achieve compliance.

Requirement Number and Definition:

	Information Required	Explanation
1. Constraints	List constraints precluding compliance with the original requirement.	
2. Objective	Define the objective of the original control; identify the objective met by the compensating control.	
3. Identified Risk	Identify any additional risk posed by the lack of the original control.	
4. Definition of Compensating Controls	Define the compensating controls and explain how they address the objectives of the original control and the increased risk, if any.	
5. Validation of Compensating Controls	Define how the compensating controls were validated and tested.	
6. Maintenance	Define process and controls in place to maintain compensating controls.	



Compensating Controls Worksheet – Completed Example

Use this worksheet to define compensating controls for any requirement where "YES" was checked and compensating controls were mentioned in the "Special" column.

Requirement Number: 8.1 – Are all users identified with a unique user name before allowing them to access system components or cardholder data?

		Information Required	Explanation
1.	Constraints	List constraints precluding compliance with the original requirement.	Company XYZ employs stand-alone Unix Servers without LDAP. As such, they each require a "root" login. It is not possible for Company XYZ to manage the "root" login nor is it feasible to log all "root" activity by each user.
2.	Objective	Define the objective of the original control; identify the objective met by the compensating control.	The objective of requiring unique logins is twofold. First, it is not considered acceptable from a security perspective to share login credentials. Secondly, having shared logins makes it impossible to state definitively that a person is responsible for a particular action.
3.	Identified Risk	Identify any additional risk posed by the lack of the original control.	Additional risk is introduced to the access control system by not ensuring all users have a unique ID and are able to be tracked.
4.	Definition of Compensating Controls	Define the compensating controls and explain how they address the objectives of the original control and the increased risk, if any.	Company XYZ is going to require all users to log into the servers from their desktops using the SU command. SU allows a user to access the "root" account and perform actions under the "root" account but is able to be logged in the SU-log directory. In this way, each user's actions can be tracked through the SU account.
5.	Validation of Compensating Controls	Define how the compensating controls were validated and tested.	Company XYZ demonstrates to assessor that the SU command being executed and that those individuals utilizing the command are logged to identify that the individual is performing actions under root privileges
6.	Maintenance	Define process and controls in place to maintain compensating controls.	Company XYZ documents processes and procedures to ensure SU configurations are not changed, altered, or removed to allow individual users to execute root commands without being individually tracked or logged



Appendix D: Explanation of Non-Applicability

If "N/A" or "Not Applicable" was entered in the "Special" column, use this worksheet to explain why the related requirement is not applicable to your organization.

Requirement	Reason Requirement is Not Applicable
Example: 12.8	Cardholder data is never shared with service providers.
2	There are no physical locations or facilites where cardholder transactions occur. All transcations take place in a web browser, at the purchasers location.