



Payment Card Industry Data Security Standard

Attestation of Compliance for Self-Assessment Questionnaire D for Service Providers

For use with PCI DSS Version 4.0.1

Publication Date: October 2024

Section 1: Assessment Information

Instructions for Submission

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

This AOC reflects the results documented in an associated Self-Assessment Questionnaire (SAQ).

Capitalized terms used but not otherwise defined in this document have the meanings set forth in the PCI DSS Self-Assessment Questionnaire.

Part 1. Contact Information

Part 1a. Assessed Entity

Company name:	Atlas Systems, Inc.
DBA (doing business as):	Aeon
Company mailing address:	5712 Cleveland St #200 Virginia Beach, VA 23462
Company main website:	https://www.atlas-sys.com/
Company contact name:	Kathy Poston
Company contact title:	Director of ITS
Contact phone number:	757-276-7660
Contact e-mail address:	kposton@atlas-sys.com

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):	Not Applicable
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Qualified Security Assessor

Company name:	Pointe Solutions Inc.
Company mailing address:	PO Box 41 Exton PA 19341
Company website:	www.pointesolutionsinc.com
Lead Assessor Name:	Hugh Burke
Assessor phone number:	610-524-1230
Assessor e-mail address:	hugh@pointesolutionsinc.com
Assessor certificate number:	PCI QSA – Certificate # 200-791

Part 2. Executive Summary

Part 2a. Scope Verification

Services that were INCLUDED in the scope of the PCI DSS Assessment (select all that apply):

Name of service(s) assessed: Aeon

Type of service(s) assessed:

Hosting Provider:

- ☒ Applications / software
- ☐ Hardware
- ☐ Infrastructure / Network
- ☐ Physical space (co-location)
- ☐ Storage
- ☐ Web-hosting services
- ☐ Security services
- ☐ 3-D Secure Hosting Provider
- ☐ Multi-Tenant Service Provider
- ☐ Other Hosting (specify):

Managed Services:

- ☒ Systems security services
- ☒ IT support
- ☐ Physical security
- ☐ Terminal Management System
- ☐ Other services (specify):

Payment Processing:

- ☐ POI / card present
- ☒ Internet / e-commerce
- ☐ MOTO / Call Center
- ☐ ATM
- ☐ Other processing (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):

Note: These categories are provided for assistance only and are not intended to limit or predetermine an entity's service description. If these categories do not apply to the assessed service, complete "Others." If it is not clear whether a category could apply to the assessed service, consult with the entity(ies) to which this AOC will be submitted.

Part 2. Executive Summary *(continued)*

Part 2a. Scope Verification *(continued)*

Services that are provided by the service provider but were NOT INCLUDED in the scope of the PCI DSS Assessment (select all that apply):

Name of service(s) not assessed: Not Applicable

Type of service(s) not assessed:

Hosting Provider:

- ☐ Applications / software
- ☐ Hardware
- ☐ Infrastructure / Network
- ☐ Physical space (co-location)
- ☐ Storage
- ☐ Web-hosting services
- ☐ Security services
- ☐ 3-D Secure Hosting Provider
- ☐ Multi-Tenant Service Provider
- ☐ Other Hosting (specify):

Managed Services:

- ☐ Systems security services
- ☐ IT support
- ☐ Physical security
- ☐ Terminal Management System
- ☐ Other services (specify):

Payment Processing:

- ☐ POI / card present
- ☐ Internet / e-commerce
- ☐ MOTO / Call Center
- ☐ ATM
- ☐ Other processing (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):

Provide a brief explanation why any checked services were not included in the assessment:

Part 2b. Description of Role with Payment Cards

Describe how the business stores, processes, and/or transmits account data.

The Aeon web server software hosts customer websites that redirect to the payment processors.

Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.

Atlas Systems provides managed services for subscribed customers of the Aeon software product.

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

E-Commerce
Aeon redirects e-Commerce transactions to a PCI DSS certified third party prior to entering cardholder data (CHD) to purchase goods from their website.

Part 2. Executive Summary *(continued)*

Part 2c. Description of Payment Card Environment

Provide a **high-level** description of the environment covered by this assessment.

For example:

- *Connections into and out of the cardholder data environment (CDE).*
- *Critical system components within the CDE, such as POI devices, databases, web servers, etc., and any other necessary payment components, as applicable.*
- *System components that could impact the security of account data.*

Aeon's e-commerce network uses web servers to transmit customer's transaction information, not cardholder data (CHD), within a shopping cart to a third-party hosted and managed payment page to process card-not-present transactions. In this environment, the Aeon web servers contain the mechanism that redirects customers from their website to a third-party service provider, contracted by the customer, for payment processing using a redirect

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

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

☒ Yes ☐ No

Part 2d. In-Scope Locations/Facilities

List all types of physical locations/facilities—for example, 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>
Atlas Corporate Headquarters	1	Virginia Beach, Virginia
Microsoft Azure	1	USA

Part 2. Executive Summary *(continued)*

Part 2e. PCI SSC Validated Products and Solutions

Does the entity use any item identified on any PCI SSC Lists of Validated Products and Solutions*?

☐ Yes ☒ No

Provide the following information regarding each item the entity uses from PCI SSC's Lists of Validated Products and Solutions.

Name of PCI SSC validated Product or Solution	Version of Product or Solution	PCI SSC Standard to which product or solution was validated	PCI SSC listing reference number	Expiry date of listing (YYYY-MM-DD)
Not Applicable				

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- * For purposes of this document, "Lists of Validated Products and Solutions" means the lists of validated products, solutions, and/or components, appearing on the PCI SSC website (www.pcisecuritystandards.org)—for example, 3DS Software Development Kits, Approved PTS Devices, Validated Payment Software, Point to Point Encryption (P2PE) solutions, Software-Based PIN Entry on COTS (SPoC) solutions, Contactless Payments on COTS (CPoC) solutions, and Mobile Payments on COTS (MPoC) products.

Part 2. Executive Summary *(continued)*

Part 2f. Third-Party Service Providers

For the services being validated, does the entity have relationships with one or more third-party service providers that:

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

If Yes:

Name of service provider:	Description of service(s) provided:
Microsoft Azure	Hosting Provider / Managed Services

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 provided within each principal PCI DSS requirement.

For all requirements identified as either “Not Applicable” or “Not Tested,” complete the “Justification for Approach” table below.

Note: One table to be completed for each service covered by this AOC. Additional copies of this section are available on the PCI SSC website.

Name of Service Assessed: Aeon

PCI DSS Requirement	Requirement Responses				
	More than one response may be selected for a given requirement. Indicate all responses that apply.				
	In Place	In Place with CCW	Not Applicable	Not Tested	Not in Place
Requirement 1:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 2:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 3:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 4:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 5:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 6:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 7:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 8:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 9:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 10:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 11:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 12:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Appendix A1:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Appendix A2:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Justification for Approach

<p>For any Not Applicable responses, identify which sub-requirements were not applicable and the reason.</p>	<p>1.4.4, 3.1.1 through 3.7.9, 4.1.1 through 4.2.2, 6.5.5, 6.5.6, 7.2.6, 8.2.1, 9.4.1 through 9.4.7, 10.1.1 through 10.7.3</p> <p>Aeon does not transmit, process or store CHD.</p> <p>2.3.1, 2.3.2</p> <p>No wireless networks are connected to the Aeon CDE.</p> <p>5.2.3.1, 5.3.2.1, 5.3.3, 5.4.1, 6.3.2, 6.4.2, 6.4.3, 7.2.4 through 7.2.5.1, 8.3.10.1, 8.4.2, 8.5.1 through 8.6.3, 11.3.1.1, 11.3.1.2, 11.4.7, 11.5.1.1, 11.6.1, 12.3.1 through 12.3.4, 12.5.2.1, 12.5.3, 12.6.2, 12.6.3.1, 12.6.3.2, 12.10.4.1, 12.10.7</p> <p>This requirement is a best practice until March 31, 2025.</p> <p>8.3.10</p> <p>Multi-Factor Authentication is required for all access.</p> <p>9.5.1 through 9.5.1.3, A2.1.1 through A2.1.3</p> <p>Aeon does not process transactions using point-of-interaction (POI) devices.</p> <p>A1.1.1 through A1.2.3</p> <p>Aeon is not a multi-tenant service provider.</p>
<p>For any Not Tested responses, identify which sub-requirements were not tested and the reason.</p>	<p>Not Applicable</p>

Section 2: Self-Assessment Questionnaire D for Service Providers

Self-assessment completion date:	2024-12-19
Were any requirements in the SAQ unable to be met due to a legal constraint?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Section 3: Validation and Attestation Details

Part 3. PCI DSS Validation

This AOC is based on results noted in SAQ D (Section 2), dated (Self-assessment completion date 2024-12-19).

Indicate below whether a full or partial PCI DSS assessment was completed:

- ☒ **Full** – All requirements have been assessed therefore no requirements were marked as Not Tested in the SAQ.
- ☐ **Partial** – One or more requirements have not been assessed and were therefore marked as Not Tested in the SAQ. Any requirement not assessed is noted as Not Tested in Part 2g above.

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

Select one:

<input checked="" type="checkbox"/>	<p>Compliant: All sections of the PCI DSS SAQ are complete, and all assessed requirements are marked as being either 1) In Place, 2) In Place with CCW, or 3) Not Applicable, resulting in an overall COMPLIANT rating; thereby <i>Atlas Systems, Inc.</i> has demonstrated compliance with all PCI DSS requirements included in this SAQ except those noted as Not Tested above.</p>								
<input type="checkbox"/>	<p>Non-Compliant: 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 NON-COMPLIANT rating, thereby (<i>Service Provider Company Name</i>) has not demonstrated compliance with the PCI DSS requirements included in this SAQ.</p> <p>Target Date for Compliance: YYYY-MM-DD</p> <p>An entity 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></p>								
<input type="checkbox"/>	<p>Compliant but with Legal exception: One or more assessed 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 assessed requirements are marked as being either 1) In Place, 2) In Place with CCW, or 3) Not Applicable, resulting in an overall COMPLIANT BUT WITH LEGAL EXCEPTION rating; thereby (<i>Service Provider Company Name</i>) has demonstrated compliance with all PCI DSS requirements included in this SAQ except those noted as Not Tested above or as Not in Place due to a legal restriction.</p> <p>This option requires additional review from the entity to which this AOC will be submitted. <i>If selected, complete the following:</i></p> <table border="1"> <thead> <tr> <th>Affected Requirement</th> <th>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. Service Provider Acknowledgement

Signatory(s) confirms:

(Select all that apply)

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

Part 3b. Service Provider Attestation

M. Jason Glover

M. Jason Glover (Dec 19, 2024 12:45 EST)

Signature of Service Provider Executive Officer ↑	Date: 12/19/24
Service Provider Executive Officer Name: Jason Glover	Title: President

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:

Hugh Burke

Signature of Lead QSA ↑	Date: 12/19/24
Lead QSA Name: Hugh Burke	

Hugh Burke

Signature of Duly Authorized Officer of QSA Company ↑	Date: 12/19/24
Duly Authorized Officer Name: Hugh Burke	QSA Company: Pointe Solutions, Inc.

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 entity 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	
1	Install and maintain network security controls	<input type="checkbox"/>	<input type="checkbox"/>	
2	Apply secure configurations to all system components	<input type="checkbox"/>	<input type="checkbox"/>	
3	Protect stored account data	<input type="checkbox"/>	<input type="checkbox"/>	
4	Protect cardholder data with strong cryptography during transmission over open, public networks	<input type="checkbox"/>	<input type="checkbox"/>	
5	Protect all systems and networks from malicious software	<input type="checkbox"/>	<input type="checkbox"/>	
6	Develop and maintain secure systems and software	<input type="checkbox"/>	<input type="checkbox"/>	
7	Restrict access to system components and cardholder data by business need to know	<input type="checkbox"/>	<input type="checkbox"/>	
8	Identify users and authenticate access to system components	<input type="checkbox"/>	<input type="checkbox"/>	
9	Restrict physical access to cardholder data	<input type="checkbox"/>	<input type="checkbox"/>	
10	Log and monitor all access to system components and cardholder data	<input type="checkbox"/>	<input type="checkbox"/>	
11	Test security systems and networks regularly	<input type="checkbox"/>	<input type="checkbox"/>	
12	Support information security with organizational policies and programs	<input type="checkbox"/>	<input type="checkbox"/>	
Appendix A1	Additional PCI DSS Requirements for Multi-Tenant Service Providers	<input type="checkbox"/>	<input type="checkbox"/>	
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/Early TLS for Card-Present POS POI Terminal Connections	<input type="checkbox"/>	<input type="checkbox"/>	

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/.










AOC SAQ D - Service Providers

Final Audit Report

2024-12-19

Created:	2024-12-19
By:	Hugh Burke (hugh@pointesolutionsinc.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAw0WN30rTTBKye7UYjWoVc2mUAZsmkeld

"AOC SAQ D - Service Providers" History

-  Document created by Hugh Burke (hugh@pointesolutionsinc.com)
2024-12-19 - 4:08:11 PM GMT
-  Document emailed to Hugh Burke (hugh@pointesolutionsinc.com) for signature
2024-12-19 - 4:08:16 PM GMT
-  Email viewed by Hugh Burke (hugh@pointesolutionsinc.com)
2024-12-19 - 4:08:34 PM GMT
-  Document e-signed by Hugh Burke (hugh@pointesolutionsinc.com)
Signature Date: 2024-12-19 - 4:09:14 PM GMT - Time Source: server
-  Document emailed to Jason Glover (jglover@atlas-sys.com) for signature
2024-12-19 - 4:09:16 PM GMT
-  Email viewed by Jason Glover (jglover@atlas-sys.com)
2024-12-19 - 4:16:58 PM GMT
-  Signer Jason Glover (jglover@atlas-sys.com) entered name at signing as M. Jason Glover
2024-12-19 - 5:45:44 PM GMT
-  Document e-signed by M. Jason Glover (jglover@atlas-sys.com)
Signature Date: 2024-12-19 - 5:45:46 PM GMT - Time Source: server
-  Agreement completed.
2024-12-19 - 5:45:46 PM GMT