



Payment Card Industry Data Security Standard

Attestation of Compliance for Report on Compliance – Service Providers

Version 4.0.1

Publication Date: August 2024

PCI DSS v4.0.1 Attestation of Compliance for Report on Compliance – Service Providers

Entity Name: Elavon, Inc.

Date of Report as noted in the Report on Compliance: June 11, 2025

Date Assessment Ended: June 09, 2025

Section 1: Assessment Information

Instructions for Submission

This Attestation of Compliance (AOC) must be completed as a declaration of the results of the service provider's assessment against the *Payment Card Industry Data Security Standard (PCI DSS) Requirements and Testing Procedures* ("Assessment"). Complete all sections. The service provider is responsible for ensuring that each section is completed by the relevant parties, as applicable. Contact the entity(ies) to which this AOC will be submitted for reporting and submission procedures.

This AOC reflects the results documented in an associated Report on Compliance (ROC). Associated ROC sections are noted in each AOC Part/Section below.

Capitalized terms used but not otherwise defined in this document have the meanings set forth in the PCI DSS Report on Compliance Template.

Part 1. Contact Information

Part 1a. Assessed Entity (ROC Section 1.1)

Company name:	Elavon, Inc.
DBA (doing business as):	Elavon North America Internet Secure Fusebox Southern DataCom (SDC) eMoney - Electronic Transaction Service (ETS) US Bank/Elavon Merchant Processing System CenPOS Converge
Company mailing address:	800 Nicollet Mall Minneapolis, MN 55402
Company main website:	www.elavon.com
Company contact name:	Richard Mann
Company contact title:	Vice President PCI Program Management Office
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Part 1b. Assessor (ROC Section 1.1)

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
Qualified Security Assessor	
Company name:	Verizon Business Services
Company mailing address:	22001 Loudoun County Parkway Ashburn, VA 20147 USA
Company website:	www.verizonenterprise.com

Lead Assessor name:	Dale Schwan
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Part 2. Executive Summary

Part 2a. Scope Verification

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

Name of service(s) assessed:	Authorization, settlement, fraud, chargeback, call center (customer support), payment processing	
Type of service(s) assessed:		
Hosting Provider: <input type="checkbox"/> Applications / software <input type="checkbox"/> Hardware <input type="checkbox"/> Infrastructure / Network <input type="checkbox"/> Physical space (co-location) <input type="checkbox"/> Storage <input type="checkbox"/> Web-hosting services <input type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input type="checkbox"/> Multi-Tenant Service Provider <input type="checkbox"/> Other Hosting (specify):	Managed Services: <input type="checkbox"/> Systems security services <input type="checkbox"/> IT support <input type="checkbox"/> Physical security <input type="checkbox"/> Terminal Management System <input type="checkbox"/> Other services (specify):	Payment Processing: <input checked="" type="checkbox"/> POI / card present <input checked="" type="checkbox"/> Internet / e-commerce <input checked="" type="checkbox"/> MOTO / Call Center <input type="checkbox"/> ATM <input type="checkbox"/> Other processing (specify):
<input checked="" type="checkbox"/> Account Management	<input checked="" type="checkbox"/> Fraud and Chargeback	<input checked="" type="checkbox"/> Payment Gateway/Switch
<input type="checkbox"/> Back-Office Services	<input type="checkbox"/> Issuer Processing	<input type="checkbox"/> Prepaid Services
<input checked="" type="checkbox"/> Billing Management	<input checked="" type="checkbox"/> Loyalty Programs	<input type="checkbox"/> Records Management
<input checked="" type="checkbox"/> Clearing and Settlement	<input checked="" type="checkbox"/> Merchant Services	<input type="checkbox"/> Tax/Government Payments
<input type="checkbox"/> Network Provider		
<input type="checkbox"/> 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 Assessment (select all that apply):

Name of service(s) not assessed: Elavon Merchant Services Europe

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:

The services identified above were assessed on the following PCI DSS assessments:
Elavon Merchant Services Europe dated Dec 04, 2024 (Ver 4.0)

Part 2b. Description of Role with Payment Cards (ROC Sections 2.1 and 3.1)

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

Elavon, Inc. (Elavon) provides many different services to their customers to facilitate card payment processing. These services include payment gateway processing (Converge), authorization, settlement, chargebacks, dispute resolution, fraud monitoring, reporting and customer call center support. Elavon processes

	<p>payments received from merchants who use various payment channels to collect cardholder data. Merchants connect with Elavon using various methods to include dedicated circuits such as MPLS, dial-up or over public Internet connections.</p> <p>In addition, Elavon is owned by US Bank. Several of the requirements in the Elavon assessment are performed or are the responsibility of U.S. Bank which have been assessed in one or more of the following PCI v4.0.1 PCI assessments:</p> <ul style="list-style-type: none"> - U.S. Bank SPA AOC V4.0.1 dated Feb 19, 2025 - U.S. Bank Cloud Common Controls AOC v4.0.1 dated Mar 21, 2025 - U.S. Bank FSV AOC v4.0.1 dated May 06, 2025 - U.S. Bank IVR AOC v4.0.1 dated Apr 29, 2025
<p>Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.</p>	<p>Elavon, Inc. has the capacity to impact the security of cardholder data by virtue of its people, processes, and technologies managing the systems and applications that store, process, and transmit cardholder data, as well as the security appliances that protect the infrastructure from attacks.</p>
<p>Describe system components that could impact the security of account data.</p>	<p>Network, systems, appliances and supporting applications could impact the security of account data.</p>

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.*

Elavon, Inc. (Elavon) processes payments received from merchants who use various payment channels to collect cardholder data. Merchants connect to Elavon using various methods including the Converge Payment Gateway, via dedicated circuits (MPLS, dial-up) as well as encrypted methods via public Internet connections. Critical components used include Stratus mainframes, Linux/Unix and Windows servers, Oracle, Sybase and MS SQL databases. Network devices include Checkpoint firewalls, Cisco routers and switches.

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

Yes No

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

Part 2d. In-Scope Locations/Facilities (ROC Section 4.6)

List all types of physical locations/facilities (for example, corporate offices, data centers, call centers and mail rooms) in scope for this Assessment.

Facility Type	Total Number of Locations (How many locations of this type are in scope)	Location(s) of Facility (city, country)

Part 2. Executive Summary *(continued)*

Part 2e. PCI SSC Validated Products and Solutions (ROC Section 3.3)

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
Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

* 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 (ROC Section 4.4)

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

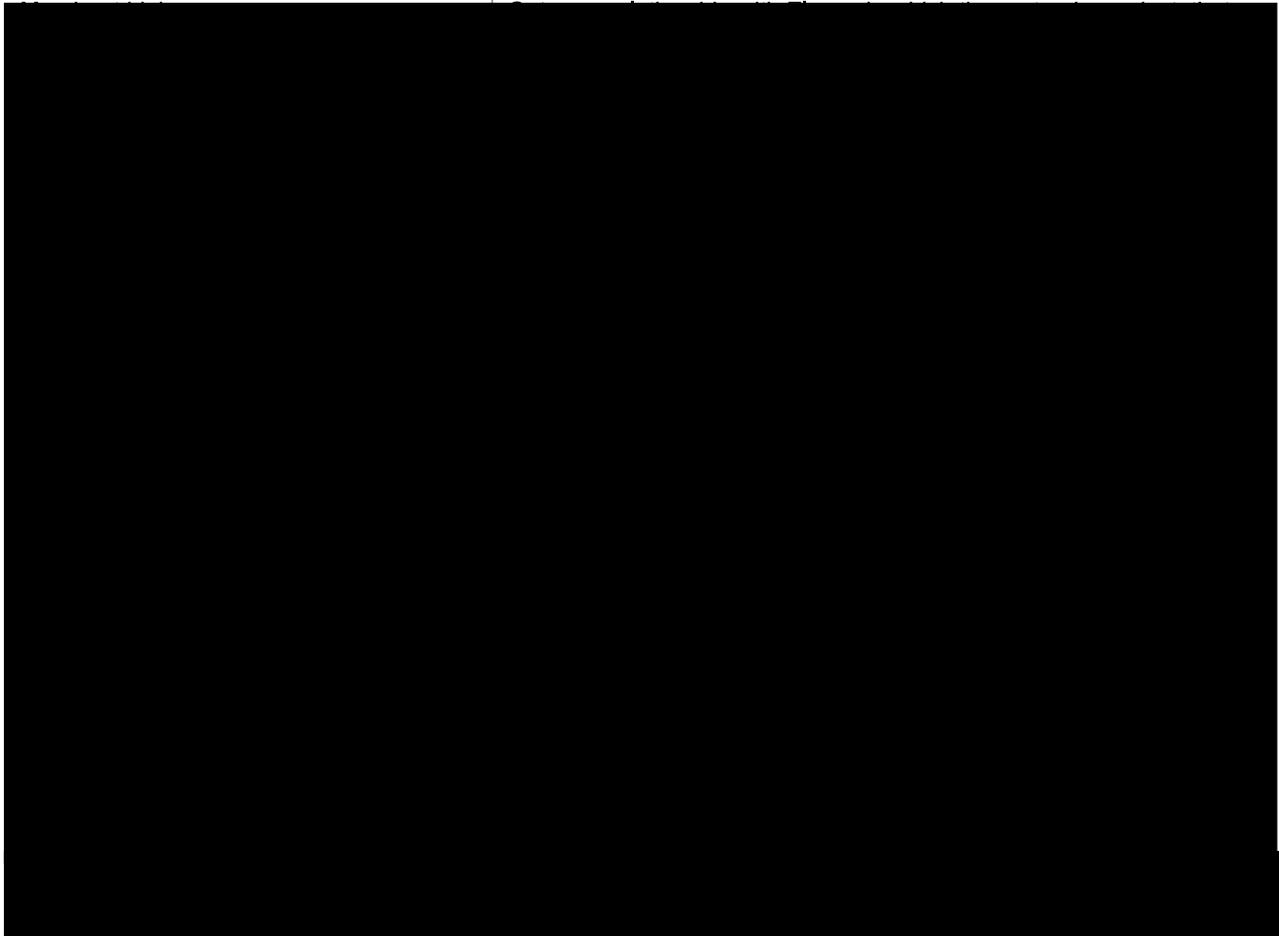
<ul style="list-style-type: none"> • Store, process, or transmit account data on the entity's behalf (for example, payment gateways, payment processors, payment service providers (PSPs, and off-site storage)) 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> • Manage system components included in the entity's Assessment (for example, via network security control services, anti-malware services, security incident and event management (SIEM), contact and call centers, web-hosting companies, 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 Services Provided:

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Note: Requirement 12.8 applies to all entities in this list.

Part 2. Executive Summary *(continued)*

Part 2g. Summary of Assessment (ROC Section 1.8.1)

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: Authorization, settlement, fraud, chargeback, call center (customer support), payment processing

PCI DSS Requirement	Requirement Finding More than one response may be selected for a given requirement. Indicate all responses that apply.				Select If a Compensating Control(s) Was Used
	In Place	Not Applicable	Not Tested	Not in Place	
Requirement 1:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 2:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 3:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Requirement 4:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 5:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 6:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 7:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Requirement 8:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Requirement 9:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 10:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 11:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Requirement 12:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Appendix A1:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Appendix A2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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>1.2.6, 2.2.5 – Insecure services, protocols and ports were not observed.</p> <p>3.3.2 - SAD is not stored prior to authorization.</p> <p>3.3.3 - Elavon does not perform issuing services</p> <p>3.5.1.2, 3.5.1.3 – Full disk encryption and partition level encryption are not the sole encryption technology for any data store.</p> <p>3.7.9 - Elavon did not share cryptographic keys with its customers for transmission or storage of account data.</p> <p>6.4.1 - This requirement has been superseded by Requirement 10.7.2 as of March 31, 2025.</p> <p>8.2.3 - No service providers have access with remote access to customer premises.</p> <p>8.2.7 - Accounts are not used by third parties to access, support, or maintain system components via remote access.</p> <p>8.3.10 - This requirement has been superseded by Requirement 8.3.10.1 as of March 31, 2025.</p> <p>9.4.1, 9.4.1.1, 9.4.1.2, 9.4.2, 9.4.3, 9.4.4, 9.4.5, 9.4.5.1 - There is no removable media in scope that contains cardholder data.</p> <p>9.5.1, 9.5.1.1, 9.5.1.2, 9.5.1.2.1, 9.5.1.3, A2.1.1, A2.1.2, A2.1.3 - No POIs exist in the scope of this assessment.</p> <p>10.7.1 - This requirement has been superseded by Requirement 10.7.2 as of March 31, 2025.</p> <p>11.3.2.1 - Elavon did not have any significant change which required external vulnerability scans.</p> <p>11.4.7, A1.1.1, A1.1.2, A1.1.3, A1.1.4, A1.2.1, A1.2.2, A1.2.3 – Elavon is not a multi-tenant service provider.</p> <p>12.3.2 - Elavon did not use the customized approach as part of this assessment.</p>
<p>For any Not Tested responses, identify which sub-requirements were not tested and the reason.</p>	<p>Not applicable</p>

Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3)

Date Assessment began: <i>Note: This is the first date that evidence was gathered, or observations were made.</i>	January 30, 2025
Date Assessment ended: <i>Note: This is the last date that evidence was gathered, or observations were made.</i>	June 9, 2025
Were any requirements in the ROC unable to be met due to a legal constraint?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were any testing activities performed remotely?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Section 3 Validation and Attestation Details

Part 3. PCI DSS Validation (ROC Section 1.7)

This AOC is based on results noted in the ROC dated *(Date of Report as noted in the ROC June 11, 2025)*.

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

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

Based on the results documented in the ROC 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 ROC are complete, and all assessed requirements are marked as being either In Place or Not Applicable, resulting in an overall COMPLIANT rating; thereby <i>Elavon, Inc.</i> has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above.</p>								
<input type="checkbox"/>	<p>Non-Compliant: Not all sections of the PCI DSS ROC 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 PCI DSS requirements.</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 before completing Part 4.</p>								
<input type="checkbox"/>	<p>Compliant but with Legal exception: One or more assessed requirements in the ROC 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 In Place or 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 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.</p> <p><i>If selected, complete the following:</i></p> <table border="1" data-bbox="290 1530 1395 1757"> <thead> <tr> <th data-bbox="290 1530 631 1608">Affected Requirement</th> <th data-bbox="631 1530 1395 1608">Details of how legal constraint prevents requirement from being met</th> </tr> </thead> <tbody> <tr> <td data-bbox="290 1608 631 1656"></td> <td data-bbox="631 1608 1395 1656"></td> </tr> <tr> <td data-bbox="290 1656 631 1705"></td> <td data-bbox="631 1656 1395 1705"></td> </tr> <tr> <td data-bbox="290 1705 631 1757"></td> <td data-bbox="631 1705 1395 1757"></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 3. PCI DSS Validation *(continued)*

Part 3a. Service Provider Acknowledgement

Signatory(s) confirms:

(Select all that apply)

<input checked="" type="checkbox"/>	The ROC was completed according to <i>PCI DSS</i> , Version 4.0.1 and was completed according to the instructions therein.
<input checked="" type="checkbox"/>	All information within the above-referenced ROC and in this attestation fairly represents the results of the 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

<u><i>Rachel Hansen</i></u> Rachel Hansen (Jun 11, 2025 09:39 MDT) Rachel Hansen Chief Information Officer, Payments 2025-06-11	<u><i>Jamie Walker</i></u> Jamie Walker (Jun 11, 2025 21:40 GMT+1) Jamie Walker CEO Elavon 2025-06-11
Signature of Service Provider Executive Officer ↑	Date:
Service Provider Executive Officer Name:	Title:

Part 3c. Qualified Security Assessor (QSA) Acknowledgement

If a QSA was involved or assisted with this Assessment, indicate the role performed:	<input checked="" type="checkbox"/> QSA performed testing procedures.
	<input type="checkbox"/> QSA provided other assistance. If selected, describe all role(s) performed:

Dale Schwan

Signature of Lead QSA ↑	Date: 2025-06-11
Lead QSA Name: Dale Schwan	

Eric Jolent
Eric Jolent (Jun 11, 2025 16:10 GMT+2)

Signature of Duly Authorized Officer of QSA Company ↑	Date: 06/11/2025
Duly Authorized Officer Name: Eric Jolent	QSA Company: Verizon Business Services

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 Non-Compliant results 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 provide 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 their program. For more information about PCI SSC and our stakeholder community please visit: https://www.pcisecuritystandards.org/about_us/