



Payment Card Industry (PCI) Data Security Standard

Attestation of Compliance for Onsite Assessments - Service Providers

Version 3.2.1

Using the PCI Security Standards Council Template dated **June 2018**

Section 1: Assessment Information

Instructions for Submission

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

Part 1. Service Provider and Qualified Security Assessor Information

Part 1a. Service Provider Organization Information

Company Name:	Cloud Software Group	DBA (doing business as):	Not Applicable.		
Contact Name:	Carmen Deluca	Title:	Compliance Program Manager		
Telephone:	+1 (786) 797-1003	E-mail:	carmen.deluca@cloud.com		
Business Address:	3307 Hillview Avenue	City:	Palo Alto		
State/Province:	CA	Country:	USA	Zip:	94304
URL:	www.cloud.com				

Part 1b. Qualified Security Assessor Company Information (if applicable)

Company Name:	A-LIGN Compliance and Security, Inc. dba A-LIGN				
Lead QSA Contact Name:	Jacob Balmaseda	Title:	Senior Consultant		
Telephone:	+1 (888) 702-5446	E-mail:	jacob.balmaseda@A-LIGN.com		
Business Address:	400 N. Ashley Drive, Suite 1325	City:	Tampa		
State/Province:	Florida	Country:	USA	Zip:	33602
URL:	https://www.A-LIGN.com				

Part 2. Executive Summary

Part 2a. Scope Verification

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

Name of service(s) assessed:		TIBCO Cloud API Management (SaaS)
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 <input type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input type="checkbox"/> Shared Hosting Provider <input checked="" type="checkbox"/> Other Hosting (specify): Software as a Service (TIBCO Cloud API Management SaaS)	Managed Services (specify): <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 type="checkbox"/> POS / card present <input type="checkbox"/> Internet / e-commerce <input type="checkbox"/> MOTO / Call Center <input type="checkbox"/> ATM <input type="checkbox"/> Other processing (specify):
<input type="checkbox"/> Account Management	<input type="checkbox"/> Fraud and Chargeback	<input type="checkbox"/> Payment Gateway/Switch
<input type="checkbox"/> Back-Office Services	<input type="checkbox"/> Issuer Processing	<input type="checkbox"/> Prepaid Services
<input type="checkbox"/> Billing Management	<input type="checkbox"/> Loyalty Programs	<input type="checkbox"/> Records Management
<input type="checkbox"/> Clearing and Settlement	<input 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 you feel these categories don't apply to your service, complete "Others." If you're unsure whether a category could apply to your service, consult with the applicable payment brand.

Part 2a. Scope Verification (continued)

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

Name of service(s) not assessed:	ActiveMatrix BPM, ActiveSpaces, BusinessConnect, BusinessEvents, BusinessWorks, Cloud AuditSafe, Cloud Events, Cloud Services Systems, Cloud Integration, Cloud Live Apps, Cloud Messaging, Cloud Tropos, Data Science, Data Virtualization, EBX, eFTL, Enterprise Message Service, Flogo Enterprise, Foresight, FTL, Graph Database, GridServer, Jaspersoft, Live Datamart, LogLogic, Managed File Transfer, MDM, Messaging, Messaging - Apache Kafka Distribution, Messaging - Eclipse Mosquitto Distribution, Nimbus, Rendezvous, Reward, Spotfire, StreamBase
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Type of service(s) not assessed:

<p>Hosting Provider:</p> <input checked="" type="checkbox"/> Applications / software <input type="checkbox"/> Hardware <input type="checkbox"/> Infrastructure / Network <input type="checkbox"/> Physical space (co-location) <input checked="" type="checkbox"/> Storage <input checked="" type="checkbox"/> Web <input type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input type="checkbox"/> Shared Hosting Provider <input type="checkbox"/> Other Hosting (specify):	<p>Managed Services (specify):</p> <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):	<p>Payment Processing:</p> <input type="checkbox"/> POS / card present <input type="checkbox"/> Internet / e-commerce <input type="checkbox"/> MOTO / Call Center <input type="checkbox"/> ATM <input type="checkbox"/> Other processing (specify):
<input type="checkbox"/> Account Management	<input type="checkbox"/> Fraud and Chargeback	<input type="checkbox"/> Payment Gateway/Switch
<input type="checkbox"/> Back-Office Services	<input type="checkbox"/> Issuer Processing	<input type="checkbox"/> Prepaid Services
<input type="checkbox"/> Billing Management	<input type="checkbox"/> Loyalty Programs	<input type="checkbox"/> Records Management
<input type="checkbox"/> Clearing and Settlement	<input type="checkbox"/> Merchant Services	<input type="checkbox"/> Tax/Government Payments
<input type="checkbox"/> Network Provider		

<input type="checkbox"/> Others (specify): Provide a brief explanation why any checked services were not included in the assessment:	Services were confirmed to be segmented from the TIBCO Cloud API Management environment and would be assessed separately from TIBCO Cloud API Management (SaaS) environment.
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Part 2b. Description of Payment Card Business

Describe how and in what capacity your business stores, processes, and/or transmits cardholder data.	The TIBCO Cloud API Management environment does not directly store, transmit and/or process cardholder data, however these systems support customer APIs that may be used for this purpose.
Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data.	TIBCO Cloud API Management is a software as a service (SaaS) offering that is owned by Cloud Software Group. The TIBCO Cloud API Management platform is designed to offer a suite of tools to create, package, test and manage APIs. TIBCO Cloud API Management offers two methods of connectivity, one embedded into the online API platform and the other being an optional on-premises API gateway. TIBCO Cloud API Management systems route traffic between public facing APIs and customer's API endpoint providing customers the ability to maintain control of API traffic. TIBCO Cloud API Management does not store, transmit, and/or process cardholder data. Customers using the TIBCO Cloud API Management solution are responsible for ensuring their API and/or web applications meet PCI-DSS compliance requirements.

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):
Corporate Office	1	Palo Alto, CA
AWS Data Centers	1	Undisclosed
Azure Data Centers	1	Undisclosed

Part 2d. Payment Applications

Does the organization use one or more Payment Applications? Yes No

Provide the following information regarding the Payment Applications your organization uses:

Payment Application Name	Version Number	Application Vendor	Is application PA-DSS Listed?	PA-DSS Listing Expiry date (if applicable)
Not Applicable.	Not Applicable.	Not Applicable.	<input type="checkbox"/> Yes <input type="checkbox"/> No	Not Applicable.

Part 2e. Description of 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).*

The assessed environment consisted of multiple networks hosted within a PCI compliant cloud service provider. Each network contained connections into and out of the CDE.

Critical system components include the following:

<ul style="list-style-type: none"> • <i>Critical system components within the CDE, such as POS devices, databases, web servers, etc., and any other necessary payment components, as applicable.</i> 	<ul style="list-style-type: none"> • Virtual Private Clouds (VPCs) • Virtual Private Networks (VPNs) • AWS and Azure Security Groups • AWS and Azure services • CentOS Linux Servers used for hosting applications, web services, databases, and other supporting services • Inbound Internet connectivity to facilitate customer API integration
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<p>Does your business use network segmentation to affect the scope of your PCI DSS environment? (Refer to "Network Segmentation" section of PCI DSS for guidance on network segmentation)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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Part 2f. Third-Party Service Providers

<p>Does your company have a relationship with a Qualified Integrator & Reseller (QIR) for the purpose of the services being validated?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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If Yes:

Name of QIR Company:	Not Applicable.
QIR Individual Name:	Not Applicable.
Description of services provided by QIR:	Not Applicable.

<p>Does your company have a relationship with one or more third-party service providers (for example, Qualified Integrator Resellers (QIR), gateways, payment processors, payment service providers (PSP), web-hosting companies, airline booking agents, loyalty program agents, etc.) for the purpose of the services being validated?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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If Yes:

Name of service provider:	Description of services provided:
Amazon Web Services	Cloud Hosting Provider
Microsoft Azure	Cloud Hosting 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 Assessed:		TIBCO Cloud API Management (SaaS)		
PCI DSS Requirement	Details of Requirements Assessed			Justification for Approach (Required for all “Partial” and “None” responses. Identify which sub-requirements were not tested and the reason.)
	Full	Partial	None	
Requirement 1:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>1.1.3 - Not Applicable. TIBCO does not store, transmit, or process cardholder data within the TIBCO Cloud API Management environment.</p> <p>1.2.3 - Not Applicable. The TIBCO Cloud API Management environment is hosted solely within AWS and Azure and wireless technologies are not used within, or connected to, the CDE.</p> <p>1.3.6 - Not Applicable. TIBCO Cloud API Management does not have any system components that store cardholder data.</p>
Requirement 2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>2.1 - Not Applicable. The CDE is hosted within a cloud environment using preconfigured hardened systems that do not have vendor default passwords or accounts.</p> <p>2.1.1 - Not Applicable. The TIBCO Cloud API Management environment is hosted solely within AWS and Azure and wireless technologies are not used within, or connected to, the CDE.</p> <p>2.2.3 - Not Applicable. TIBCO Cloud API Management does not use insecure ports, protocols, and/or services.</p> <p>2.6 - Not Applicable. TIBCO Cloud API Management is not a shared hosting provider.</p>
Requirement 3:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>3.1-3.2.d, 3.3-3.4.e, 3.5-3.6.8.b - Not Applicable. TIBCO Cloud API Management does not directly store, transmit, and/or process cardholder data.</p> <p>3.4.1 - Not Applicable. TIBCO Cloud API Management does not use disk encryption.</p>

Requirement 4:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Applicable. The TIBCO Cloud API Management environment does not directly store, transmit and/or process cardholder data, however these systems support customer APIs that may be used for this purpose. TIBCO Cloud API Management Customers determine how APIs are configured and used (including transmission encryption), therefore compliance with this requirement is the Customers responsibility.
Requirement 5:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 6:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	6.5.3 - Not Applicable. TIBCO Cloud API Management does not store, transmit, and/or process cardholder data. 6.5.7-6.6 - Not Applicable. TIBCO Cloud API Management's traffic manager and supporting applications are not web applications.
Requirement 7:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Requirement 8:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8.1.5 - Not Applicable. TIBCO Cloud API Management does not permit third-parties to access, support, and/or maintain system components via remote access. 8.5.1 - Not Applicable. TIBCO Cloud API Management does not maintain remote access to customer environments. 8.7 - Not Applicable. TIBCO Cloud API Management does not store, transmit and/or process cardholder data. Customers using the TIBCO Cloud API Management service may store, transmit, and/or process cardholder data through their API, and compliance with this requirement is their responsibility.
Requirement 9:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	9.1.2, 9.5.1, 9.6.1, 9.6.2, 9.6.3 - Not Applicable. This control is covered by the cloud hosting providers and this requirement has been marked 'Not Applicable' on their AOCs. 9.5, 9.6, 9.7-9.8 - Not Applicable. Cardholder data is not stored on any media. 9.9.x - Not Applicable. Devices that capture payment card data via direct physical interaction with the card are not used.
Requirement 10:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	10.2.1 - Not Applicable. TIBCO Cloud API Management does not store cardholder data.
Requirement 11:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	11.3.2 - Not Applicable. The TIBCO Cloud API Management environment is solely hosted within Virtual Private Clouds hosted by AWS and Azure. There is no internal perimeter that is exposed for which internal testing would be required.
Requirement 12:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Appendix A1:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Applicable. TIBCO Cloud API Management is not a shared hosting provider.

Appendix A2:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Applicable. TIBCO Cloud API Management does not utilize POS POI terminals.
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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:	26 June 2023
Have compensating controls been used to meet any requirement in the ROC?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any requirements in the ROC identified as being not applicable (N/A)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any requirements not tested?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were any requirements in the ROC 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 the ROC dated 26 June 2023.

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**):

<input checked="" type="checkbox"/>	<p>Compliant: All sections of the PCI DSS ROC are complete, all questions answered affirmatively, resulting in an overall COMPLIANT rating; thereby TIBCO API Management has demonstrated full compliance with the PCI DSS.</p>						
<input type="checkbox"/>	<p>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 <i>(Service Provider Company Name)</i> has not demonstrated full compliance with the PCI DSS.</p> <p>Target Date for Compliance:</p> <p>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. <i>Check with the payment brand(s) before completing Part 4.</i></p>						
<input type="checkbox"/>	<p>Compliant but with Legal exception: One or more requirements are marked "Not in Place" due to a legal restriction that prevents the requirement from being met. This option requires additional review from acquirer or payment brand.</p> <p><i>If checked, complete the following:</i></p> <table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 40%;">Affected Requirement</th> <th>Details of how legal constraint prevents requirement being met</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Affected Requirement	Details of how legal constraint prevents requirement being met				
Affected Requirement	Details of how legal constraint prevents requirement being met						

Part 3a. Acknowledgement of Status

Signatory(s) confirms:


(Check all that apply)

<input checked="" type="checkbox"/>	The ROC was completed according to the <i>PCI DSS Requirements and Security Assessment Procedures, Version 3.2.1</i> , 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 my assessment in all material respects.
<input type="checkbox"/>	I have confirmed with my payment application vendor that my payment system does not store sensitive authentication data after authorization.
<input checked="" type="checkbox"/>	I have read the PCI DSS and I recognize that I must maintain PCI DSS compliance, as applicable to my environment, at all times.
<input checked="" type="checkbox"/>	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)

<input checked="" type="checkbox"/>	No evidence of full track data ¹ , CAV2, CVC2, CID, or CVV2 data ² , or PIN data ³ storage after transaction authorization was found on ANY system reviewed during this assessment.
<input checked="" type="checkbox"/>	ASV scans are being completed by the PCI SSC Approved Scanning Vendor Qualys.

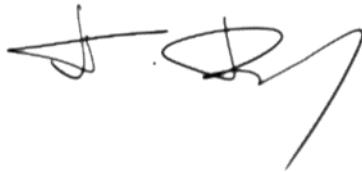
Part 3b. Service Provider Attestation

DocuSigned by:

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<i>Signature of Service Provider Executive Officer</i> ↑	<i>Date:</i> 21 August 2023
<i>Service Provider Executive Officer Name:</i> Meghan Hester	<i>Title:</i> Sr, Dir., IT Governance

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

If a QSA was involved or assisted with this assessment, describe the role performed:	The assessor provided PCI DSS advisory and assessment services, which included observation of controls, interviews with key personnel, and review of policies and procedures.
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<i>Signature of Duly Authorized Officer of QSA Company</i> ↑	<i>Date:</i> 21 August 2023
<i>Duly Authorized Officer Name:</i> Petar Besalev, EVP Cybersecurity and Compliance Services	<i>QSA Company:</i> A-LIGN

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

If an ISA(s) was involved or assisted with this assessment, identify the ISA personnel, and describe the role performed:	Not Applicable.
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¹ Data encoded in the magnetic stripe or equivalent data on a chip used for authorization during a card-present transaction. Entities may not retain full track data after transaction authorization. The only elements of track data that may be retained are primary account number (PAN), expiration date, and cardholder name.

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

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

Part 4. Action Plan for Non-Compliant Requirements

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

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

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

