

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: Paragon Payment Solutions

Date of Report as noted in the Report on Compliance: December 15, 2024

Date Assessment Ended: December 9, 2024



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:	Blue Parasol Group, LLC (Paragon Payment Solutions), a wholly owned subsidiary of Paya Holdings Inc.
DBA (doing business as):	Paragon Payment Solutions
Company mailing address:	303 Perimeter Center North, Suite 600, Atlanta, GA 30346
Company main website:	https://paya.com
Company contact name:	Alex Tan
Company contact title:	Chief Security Officer
Contact phone number:	404-933-6140
Contact e-mail address:	alex.t@nuvei.com

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:	AARC-360	
Company mailing address:	8000 Avalon Boulevard Suite 100, Alpharetta GA 30009	
Company website:	https://www.aarc-360.com	
Lead Assessor name:	James Spence	
Assessor phone number:	(866) 576-4414 ex 108	
Assessor e-mail address:	James.Spence@AARC-360.com	



Assessor certificate number: 025-041 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: Paragon Payment Solutions Type of service(s) assessed: **Hosting Provider:** Managed Services: Payment Processing: ☐ POI / card present Applications / software ☐ Systems security services ☐ Hardware ☐ IT support ☐ MOTO / Call Center ☐ Infrastructure / Network ☐ Physical security ☐ Physical space (co-location) ☐ Terminal Management System \square ATM ☐ Storage ☐ Other services (specify): ☐ Other processing (specify): ☐ Web-hosting services ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Multi-Tenant Service Provider ☐ Other Hosting (specify): ☐ Account Management □ Payment Gateway/Switch ☐ Back-Office Services ☐ Issuer Processing ☐ Prepaid Services ☐ Records Management ☐ Billing Management ☐ Loyalty Programs ☐ Tax/Government Payments ☐ Clearing and Settlement ☐ 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 Assessment (select all that apply): Name of service(s) not assessed: All services were included in the assessment. Type of service(s) not assessed: **Hosting Provider: Managed Services: Payment Processing:** ☐ Applications / software ☐ Systems security services ☐ POI / card present ☐ Hardware ☐ IT support ☐ Internet / e-commerce ☐ MOTO / Call Center ☐ Infrastructure / Network ☐ Physical security ☐ Physical space (co-location) ☐ Terminal Management System \square ATM ☐ Other processing (specify): ☐ Storage ☐ Other services (specify): ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Multi-Tenant Service Provider ☐ Other Hosting (specify): ☐ Account Management ☐ Fraud and Chargeback ☐ Payment Gateway/Switch ☐ Back-Office Services ☐ Issuer Processing ☐ Prepaid Services ☐ Billing Management ☐ Loyalty Programs ☐ Records Management ☐ Clearing and Settlement ☐ 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 (ROC Sections 2.1 and 3.1) Describe how the business stores, processes, and/or Paragon Solutions engages in financial transaction transmits account data. processing services that involve multiple cardholder data flows. These flows are how cardholder data is stored, processed, and transmitted in each, as follows: **Updating Credit Card Information in Card Safe** 1. Paragon Solutions initiates a transaction on CDE Server over port 443 through the Azure Network Security Groups to send PGP Key to third-party gateway provider.



2. Third-party gateway provider transmits encrypted credit card information via SFTP to provide access to the data center. 3. Paragon Solutions decrypts the data on CDE Server and uploads it to Paragon Solutions gateway over port 443 and stores the cardholder data (CHD) encrypted in an SQL database on the database server. 4. platform.paragonsolutions.com responds with tokens over TLS. 5. Paragon Solutions sends tokens to Integrated Service Vendor (ISV) from the CDE server via HTTPS. **Payment Gateway** 1. Merchant initiates a transaction on platform.paragonsolutions.com over port 443 TLS HTTPS via API, Hosted Payment Page, or Virtual Terminal through the Phoenix Managed Networks (PMN) load balancer and Azure Virtual Application Firewall Cluster. 2. platform.paragonsolutions.com queries the Azure SQL database over port 1433 through the Azure Private Network. 3. Database responds to platform.paragonsolutions.com over the established connection. 4. platform.paragonsolutions.com initiates a transaction with the Processor over TLS. 5. Processor responds with the transaction approval over TLS. 6. platform.paragonsolutions.com stores responses in the Azure SQL database over port 1433 through the Azure Private Network and stores the CHD encrypted in the SQL database. 7. Database responds with completion. 8. Merchant is notified of the approval status.

Paragon Solutions stores, processes and transmits

Web application servers, load balancers Database.

payment processing.

cardholder data received from its customers to facilitate

Describe how the business is otherwise involved in or

has the ability to impact the security of its customers'

Describe system components that could impact the

account data.

security of account data.



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.

Paragon Solutions receives CHD via gateway servers in Azure (managed by PMN). Customers connect to gateway application and transmit CHD over TLS, which may then be stored in Azure SQL encrypted. Paragon then sends CHD to processors via TLS.

Authorization data flows are related to Paragon Solutions Gateway activities as follows:

- 1. Merchant initiates a transaction on platform.paragonsolutions.com over port 443 TLS https via API, Hosted Payment Page or Virtual Terminal through the Rackspace load balancer, and Azure Virtual Application Firewall Cluster.
- 2. *platform.paragonsolutions.com* queries the Azure SQL database over port 1433 through the Azure Private Network.
- 3. Database responds to platform.paragonsolutions.com over the established connection.
- 4. *platform.paragonsolutions.com* initiates transaction with Processor over TLS or Private connection.
- 5. Processor responds with the transaction approval over TLS or Private connection.
- platform.paragonsolutions.com stores response in the Azure SQL database over port 1433 through the Azure Private Network.
- 7. Database responds with completion.
- 8. Merchant is notified of approval status.

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)
Example: Data centers	3	Boston, MA, USA



Azure Cloud	1	USA
QTS data center	1	Atlanta, GA



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
None				YYYY-MM-DD
				YYYY-MM-DD

^{*} 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 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:

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))			
 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) 			
	Could impact the security of the entity's CDE (for example, vendors providing support via remote access, and/or bespoke software developers). ✓ Yes □ No		
If Yes:			
Name of Service Provider:	Description of Services Provided:		
Name of Service Provider: Phoenix Managed Networks (PMN)	Description of Services Provided: Network management (including management of Azure environment)		
	Network management (including		
Phoenix Managed Networks (PMN)	Network management (including management of Azure environment)		
Phoenix Managed Networks (PMN) TSYS Acquiring Solutions	Network management (including management of Azure environment) Payment processing services, VISANET		
Phoenix Managed Networks (PMN) TSYS Acquiring Solutions First Data (Fiserv Solutions)	Network management (including management of Azure environment) Payment processing services, VISANET Payment processing services		

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



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: Paragon Payment Solutions

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
	In Place	Not Applicable	Not Tested	Not in Place	Used
Requirement 1:	\boxtimes	\boxtimes			
Requirement 2:	\boxtimes	\boxtimes			
Requirement 3:	\boxtimes	\boxtimes			
Requirement 4:	\boxtimes	\boxtimes			
Requirement 5:	\boxtimes	\boxtimes			
Requirement 6:	\boxtimes	\boxtimes			
Requirement 7:	\boxtimes	\boxtimes			
Requirement 8:	\boxtimes	\boxtimes			
Requirement 9:	\boxtimes	\boxtimes			
Requirement 10:	\boxtimes	\boxtimes			
Requirement 11:	\boxtimes	\boxtimes			
Requirement 12:	\boxtimes	\boxtimes			
Appendix A1:		\boxtimes			
Appendix A2:		\boxtimes			
Justification for Approach					



For any Not Applicable responses, identify which sub-

requirements were not applicable and the reason.

- 1.3.3 Not applicable the assessor examined the scope, dataflow diagrams, the configuration settings and confirmed that no wireless networks are included in the PMNs environment.
- 2.3.2 Not applicable The assessor examined the scope, diagrams and network settings and confirmed that there were no wireless systems in scope.
- 3.3.1.3 Not applicable The assessor verified that Paragon Payment Solutions (PMS) does not store personal identification numbers (PIN) or encrypted PIN block after authorization.
- 3.3.2 Not applicable -Best practice until March 31, 2025
- 3.3.3 Not applicable Paragon Payment Solutions (PMS) is not a card issuer.
- 3.5.1.1 Not applicable. Hashing was not used.
- 3.5.1.2 through 3.5.1.3 Not applicable Paragon Payment Solutions does not use disk-level encryption.
- 3.7.7 all cardholder data is in the Azure environment is the responsibility of and managed by PCI DSS compliant services provider Phoenix Managed Networks
- 3.7.9 Not applicable Paragon Solutions is a service provider, but they do not share keys with their customers.
- 4.2.1.2 Not applicable Wireless networks are not part of the Azure cloud.
- 4.2.2 Not applicable End-user messaging technologies are not used to send card holder data.
- 5.2.2 these systems are the responsibility of and managed by PCI DSS compliant services provider Phoenix Managed Networks
- 5.4.1 Best practice until March 31, 2025.
- 6.3.2 Best practice until March 31, 2025.
- 6.4.3 Not applicable The assessor interviewed Int-01 and verified there are no payment scripts loaded or executed in a consumer's browser.
- 7.2.4 through 7.2.5.1 Not applicable Best practice until March 31, 2025
- 8.2.3 Not applicable the assessor reviewed account settings, user IDs access controls in networks and confirmed that service providers do not have remote access to customer premises.
- 8.2.7 Not applicable third parties are not granted access to system components. Review of accounts and interviews confirmed this.
- 8.3.6 Not applicable Best practice until March 31, 2025
- $8.3.10\ through\ 8.3.10.1$ Not applicable customers are not granted access.
- 8.3.11 Not applicable underlying systems are cloud based or managed by QTS and PMN in Azure. 8.4.2 Not applicable Best practice until March 31, 2025



	8.5.1 through 8.6.3 - Not applicable - Best practice until March 31, 2025
	9.4.1 through 9.4.7 - Not applicable — No media exists in the cloud-based CHD. 9.5.1 through 9.5.1.3 - Not applicable - Paragon Solutions does not maintain POI devices in its CDE.
	11.2.1 through 11.2.2 - No wireless components are available in the could-based environment. 11.3.1.1 through 11.3.1.2 - Not applicable - Best practice until March 31, 2025. 11.4.7 - Not applicable – not a multi-tenant service provider. 11.6.1 - Not applicable - Best practice until March 31 2025.
	12.3.2 - Not applicable – Paragon Payment Solutions did not use a customized approach. 12.3.3 through 12.3.4 - Not applicable - Best practices until March 31, 2025. 12.6.3.1 - Not applicable - Best practices until March 31, 2025.
	A1 - Paragon is not a Multi-Tenant Service Provider. A2 - Paragon does not have Card-Present transactions.
For any Not Tested responses, identify which sub- requirements were not tested and the reason.	Not applicable



Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3)

Date Assessment began:	August 29, 2024
Note: This is the first date that evidence was gathered, or observations were made.	
Date Assessment ended:	December 9, 2024
Note: This is the last date that evidence was gathered, or observations were made.	
Were any requirements in the ROC unable to be met due to a legal constraint?	☐ Yes ⊠ No
Were any testing activities performed remotely?	☐ Yes ⊠ No



Section 3 Validation and Attestation Details

Part 3. PCI DSS Validation (ROC Section 1.7)

Indica Fue as Pae as	ate below whether a full or partial all Assessment – All requirement Not Tested in the ROC. Artial Assessment – One or mor Not Tested in the ROC. Any requirement	in the ROC dated December 15, 2024. PCI DSS assessment was completed: Its have been assessed and therefore no requirements were marked The requirements have not been assessed and were therefore marked direment not assessed is noted as Not Tested in Part 2g above. The ROC noted above, each signatory identified in any of Parts 3b-3d,		
as ap		ompliance status for the entity identified in Part 2 of this document		
	marked as being either In Place	PCI DSS ROC are complete, and all assessed requirements are or Not Applicable, resulting in an overall COMPLIANT rating; thereby as demonstrated compliance with all PCI DSS requirements except re.		
	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 (Service Provider Company Name) has not demonstrated compliance with PCI DSS requirements.			
	Target Date for Compliance: Y	YYY-MM-DD		
	· · ·	th a Non-Compliant status may be required to complete the Action Confirm with the entity to which this AOC will be submitted before		
	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 (Service Provider Company Name) 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.			
	This option requires additional review from the entity to which this AOC will be submitted.			
	If selected, complete the following:			
	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) The ROC was completed according to PCI DSS, Version 4.0.1 and was completed according to the instructions therein. \boxtimes All information within the above-referenced ROC and in this attestation fairly represents the results of the Assessment in all material respects. \boxtimes PCI DSS controls will be maintained at all times, as applicable to the entity's environment. Part 3b. Service Provider Attestation Signature of Service Provider Executive Officer 1 Date: 16/12/24 Service Provider Executive Officer Name: Alex Tan Title: Chief Security Officer Part 3c. Qualified Security Assessor (QSA) Acknowledgement If a QSA was involved or assisted with this QSA performed testing procedures. Assessment, indicate the role performed: ☐ QSA provided other assistance. If selected, describe all role(s) performed: Jame Gh 16/12/24 Signature of Lead QSA ↑ Date: Lead QSA Name: James Spence Signature of Duly Authorized Officer of QSA Company 1 Date: December 15, 2024 Duly Authorized Officer Name: Neil Gonsalves QSA Company: AARC-360 Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement If an ISA(s) was involved or assisted with this ☐ ISA(s) performed testing procedures. Assessment, indicate the role performed: ☐ 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	Requirement)
1	Install and maintain network security controls			
2	Apply secure configurations to all system components			
3	Protect stored account data			
4	Protect cardholder data with strong cryptography during transmission over open, public networks			
5	Protect all systems and networks from malicious software			
6	Develop and maintain secure systems and software			
7	Restrict access to system components and cardholder data by business need to know			
8	Identify users and authenticate access to system components			
9	Restrict physical access to cardholder data			
10	Log and monitor all access to system components and cardholder data			
11	Test security systems and networks regularly			
12	Support information security with organizational policies and programs			
Appendix A1	Additional PCI DSS Requirements for Multi- Tenant Service Providers			
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card- Present POS POI Terminal Connections			

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/

PCI DSS AOC - Paragon

Final Audit Report 2024-12-16

Created: 2024-12-16

By: Neil Gonsalves (neil.gonsalves@aarc-360.com)

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