

Payment Card Industry Data Security Standard

Attestation of Compliance for Report on Compliance – Service Providers

Version 4.0

Revision 1

Publication Date: December 2022



PCI DSS v4.0 Attestation of Compliance for Report on **Compliance – Service Providers**

Entity Name: Passage HoldCo, LLC

Mobile Axept North America, Inc. Monetra Technologies, LLC Pace Payment Systems, Inc. Pace Payments, Inc.

Assessment End Date: August 30, 2024

Date of Report as noted in the Report on Compliance: August 30, 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.

Report on Compliance Template.	
Part 1. Contact Information	
Part 1a. Assessed Entity (ROC Section 1.1)	
Company name:	Passage HoldCo, LLC Mobile Axept North America, Inc. Monetra Technologies, LLC Pace Payment Systems, Inc. Pace Payments, Inc.
DBA (doing business as):	Monetra, TranSafe, Pace, PlacePay, mobileAxept, Bill and Pay, Fairway Payments
Company mailing address:	40 Burton Hills Blvd., Ste 415, Nashville, TN 37215
Company main website:	https://www.i3verticals.com/
Company contact name:	Paul Maple
Company contact title:	i3 Verticals General Counsel & Corporate Secretary
Contact phone number:	615-465-4487
Contact e-mail address:	pmaple@i3verticals.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:	Frazier & Deeter, LLC
Company mailing address:	1230 Peachtree Street NE Suite 1500 Atlanta, GA 30309
Company website:	https://www.frazierdeeter.com/
Lead Assessor name:	Jessie Sandell
Assessor phone number:	615-416-6882

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Assessor e-mail address:	jessie.sandell@frazierdeeter.com			
Assessor certificate number: QSA 206-329				
Part 2. Executive Summary				
Part 2a. Scope Verification				
Services that were <u>INCLUDED</u> in the	ne scope of the Assessment (select	all that apply):		
Name of service(s) assessed:	Bill and Pay, BIS, Burton (including V EZCourtPay ("EZCP"), i3 Education (EZPay, and Local Level), iGov Soluti TranSafe (including Monetra)	(including SchoolPay, PaySchools,		
Type of service(s) assessed:				
Hosting Provider:	Managed Services:	Payment Processing:		
☐ Applications / software	☐ Systems security services	⊠ POI / card present		
☐ Hardware	☐ IT support			
☐ Infrastructure / Network	☐ Physical security			
☐ Physical space (co-location)	☐ Terminal Management System	☐ 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	☐ Fraud and Chargeback	□ Payment Gateway/Switch □ Payme		
⊠ Back-Office Services	☐ Issuer Processing	☐ Prepaid Services		
⊠ Billing Management	☐ Loyalty Programs	☐ Records Management		
☐ Clearing and Settlement		☐ Tax/Government Payments		
☐ Network Provider				
Others (specify):				
service description. If these categories	for assistance only and are not intende s do not apply to the assessed service, assessed service, consult with the ent	complete "Others." If it is not clear		



Part 2a. Scope Verification (contin	ued)			
Services that are provided by the s Assessment (select all that apply):		were <u>NOT INCL</u>	UDED in the scope of the	
Name of service(s) not assessed:	Retail POS, Mero	chant Services an	d anything else not explicitly stated	
Type of service(s) not assessed:	'			
Hosting Provider:	Managed Services	: :	Payment Processing:	
☐ Applications / software	☐ Systems securit	y services	⊠ POI / card present	
☐ Hardware	☐ IT support			
☐ Infrastructure / Network	☐ Physical securit	у	☐ MOTO / Call Center	
☐ Physical space (co-location)	☐ Terminal Manag	jement System	☐ 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	☐ Fraud and Char	geback	□ 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:		not included in material to the store, process security of CH compliance as this DSS asseprovider are re	ided by the service provider that were in this assessment were either not a service provider's business, did not a transmit, or otherwise impact the ID, or were covered in another assessment and therefore excluded from assment. The services offered by the e-evaluated annually to determine ashould be included in a DSS or other assessment.	
Part 2b. Description of Role with P (ROC Section 2.1)	ayment Cards			
Describe how the business stores, protransmits account data.	rocesses, and/or		eceived by mobileAxept are transmitted in https://eceived.com/disaurage/	



TLS v1.2. A unique transaction token and the last four digits of the card number are retained in the mobileAxept database.

Bill & Pay

Payment data received by Bill and Pay are transmitted for processing via HTTPS over port 443 secured with TLS v1.2. A unique transaction token and the last four digits of the card number are retained in the Bill and Pay database.

PlacePay

Payment data received by PlacePay are transmitted for processing via HTTPS over port 443 secured with TLS v1.2. Account data persists in the PlacePay database and secured via strong cryptography.

Fuze

Payment data received by the Fuze APIs are transmitted to TranSafe via HTTPS over port 443 secured with TLS v1.2. Fuze retains only tokens in its database.

TranSafe (including Monetra)

Payment data received by TranSafe are transmitted to the appropriate processor over port 443 secured with TLS v1.2. Account data persists in the TranSafe database and secured via strong cryptography.

Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data. Passage HoldCo is responsible for securing account data at all stages of the transaction lifecycle--including its reception via in-person or ecommerce payment channels, its transit over the Internet, and any storage when secured rest within any Passage HoldCo database. As a third-party service provider, Passage HoldCo is aware of its ability to impact the security of its customers' account data and has taken care to implement the necessary controls required achieve and maintain security compliance.

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

Passage HoldCo technologies that could impact the security of account data include AWS infrastructure-as-a-service (laaS) products (e.g., EC2, Network Security Groups, and GuardDuty) network security controls at i3 Private Cloud datacenters (e.g., Juniper firewalls), endpoint protection technologies (e.g., Defender for Endpoint and TrendMicro) WAF technologies (e.g., Cloudflare, AWS WAF, ModSecurity), database technologies such as MariaDB; administrator workstations (including laptops); and authentication services such as JumpCloud.



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.

mobileAxept

mobileAxept tokenizes cardholder data, enabling donors to make recurring or one-time donations to organizations. Donors create a profile with their demographic and payment information, allowing them to make ongoing donations to their chosen organization without needing to re-enter their card information after the initial setup.

Bill & Pay

Bill & Pay is an invoicing and billing platform that helps businesses to manage their payment and account receivables processes. It serves as a central solution for businesses to create and track invoices and for customers to receive and pay bills.

PlacePay

PlacePay is a payment solution designed for the real estate industry, handling property management transactions such as homeowners' association (HOA) fees, rent payments, and commercial real estate payments

Pace Payments

Pace Payments is a provider of fully integrated payment and transaction solutions tailored to the public sector and education industry. Pace markets, distributes, and sells payment processing products, including software, primarily through integrated partnerships within these verticals. One of the Fuze implementations ("Fuze 1.0" is offered and managed by Atlantic-Pacific Processing Systems (APPS).

TranSafe (including Monetra)
Monetra is a PCI-SSF validated application purpose-built to scale from small custom embedded devices to fully redundant payment servers capable of processing thousands of transactions per minute. TranSafe is the SaaS form of the Monetra gateway where Passage HoldCo hosts and manages the underlying infrastructure of the solution, including the storage and processing of transaction and account data.

Assessment.	



(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)
Datacenters (AWS)	619	(Refer to AWS PCI DSS AOC)
Datacenters (i3 Private Cloud)	3	Jacksonville, FL Atlanta, GA Charlotte, NC



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
Monetra	9.x.y	Secure Software Standard v1.1	22-45.01232.001	1 Oct 2025

^{*} 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, Payment Applications (PA-DSS), Point to Point Encryption (P2PE) solutions, Software-Based PIN Entry on COTS (SPoC) solutions, and Contactless Payments on COTS (CPoC) solutions).



entity have relationships with one or more third-		
on the entity's behalf (for example, payment it service providers (PSPs, and off-site storage))	⊠ Yes	□ No
the entity's Assessment (for example, via alware services, security incident and event enters, web-hosting companies, and laaS, PaaS,	⊠ Yes	□ No
CDE (for example, vendors providing support via e developers).	⊠ Yes	□ No
Description of Services Provided:		
Infrastructure hosting		
Payment processing		
WAF/DNS		
Payment Processing		
Third party data center		
Third party data center		
Third party data center		
Payment Processing		
Payment Processing		
<u> </u>		
Payment Processing		
	on the entity's behalf (for example, payment at service providers (PSPs, and off-site storage)) I the entity's Assessment (for example, via alware services, security incident and event enters, web-hosting companies, and laaS, PaaS, CDE (for example, vendors providing support via edevelopers). Description of Services Provided: Infrastructure hosting Payment processing WAF/DNS Payment Processing Third party data center Third party data center Third party data center Payment Processing Payment Processing Payment Processing Payment Processing	on the entity's behalf (for example, payment it service providers (PSPs, and off-site storage)) the entity's Assessment (for example, via alware services, security incident and event enters, web-hosting companies, and laaS, PaaS, CDE (for example, vendors providing support via edevelopers). Description of Services Provided: Infrastructure hosting Payment processing WAF/DNS Payment Processing Third party data center Third party data center Third party data center Payment Processing Payment Processing Payment Processing Payment Processing



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

Indicate below all responses provided within each principal PCI DSS requirement.

PCI DSS Requirement	Requirement Finding More than one response may be selected for a given requirement. Indicate all responses that apply.				Select If Below Method(s) Was Used		
roquirement	In Place	In Place Not Applicable Not Tested Not in Place		Customized Approach	Compensating Controls		
Requirement 1:	\boxtimes						
Requirement 2:	×	×					
Requirement 3:	×	×					
Requirement 4:	×	×					
Requirement 5:	×	×					
Requirement 6:	\boxtimes	×					
Requirement 7:	×	×					
Requirement 8:	×	×					
Requirement 9:	\boxtimes						
Requirement 10:	\boxtimes						
Requirement 11:	\boxtimes						
Requirement 12:	\boxtimes						
Appendix A1:		×					
Appendix A2:		×					
Appendix A3:		×					



Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3.2)

Date Assessment began: Note: This is the first date that evidence was gathered, or observations were made.			April 22,	2024		
Date Assessment ended: Note: This is the last date that evidence was gathered, or observations were made.				August 3	30, 2024	
Were any requirements in the ROC unable to be	met due to	a legal cor	nstraint?		□ Yes	⊠ No
Were any testing activities performed remotely? If yes, for each testing activity below, indicate who performed:	ether remot	e assessm	ent activitie	es were	⊠ Yes	□ No
Examine documentation		Yes		No		
Interview personnel		Yes		No		
Examine/observe live data		Yes		No		
Observe process being performed		Yes		No		
Observe physical environment		Yes		No		
Interactive testing		Yes		No		
Other: N/A		Yes		No		



Section 3 Validation and Attestation Details

Part 3. PCI DSS Validation (ROC Section 1.7)

Thi	s AOC is based on results noted in the ROC dated August 30, 2024
Indi	icate below whether a full or partial PCI DSS assessment was completed:
\boxtimes	Full Assessment – All requirements have been assessed and therefore no requirements were marked as No 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.
	sed on the results documented in the ROC noted above, each signatory identified in any of Parts 3b-3d, as blicable, assert(s) the following compliance status for the entity identified in Part 2 of this document (select one).

×	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 Passage HoldCo, LLC Mobile Axept North America, Inc. Monetra Technologies, LLC Pace Payment Systems, Inc. Pace Payments, Inc. has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above.
	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:
	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.
	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 antian requires additional review from the antity to which this ACC will be submitted

This option requires additional review from the entity to which this AOC will be submitted.

Affected Requirement Details of how legal constraint prevents requirement from being met

If selected, complete the following:



Part 3a. Service Provider Acknowledgement							
Signatory(s) confirms: (Select all that apply)							
\boxtimes	The ROC was completed according to <i>PCI DSS</i> , Version 4.0 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						
(igned by: Maple						
Signa	28B706093EA432 hture of Service Provider Executive Office	er ↑	Date: September 4, 2024 5:27 PM ED				
Servi	ce Provider Executive Officer Name: Pau	ıl Maple	Title: General Counsel & Secretary				
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: Not Applicable					
(igned by: ssie Sandell						
Signa	19053C855614F1. ture of Lead QSA ↑		Date: September 4, 2024				
Lead QSA Name: Jessie Sandell							
(Docusigned by: Lindy Millit						
Signa	nture of Duly Authorized Officer of QSA C	Company ↑	Date: September 4, 2024				
Duly	Authorized Officer Name: Mindy Milliet		QSA Company: Frazier & Deeter, LLC				
Part 3	3d. PCI SSC Internal Security Assesso	or (ISA) Involvement					
	ISA(s) was involved or assisted with	☐ ISA(s) performed testing procedures.					
this /	Assessment, indicate the role ormed:	☐ ISA(s) provided other assistance.					
•		If selected, describe all role(s) performed: Not Applicable					



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
		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	\boxtimes		
6	Develop and maintain secure systems and software	\boxtimes		
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	\boxtimes		
10	Log and monitor all access to system components and cardholder data	\boxtimes		
11	Test security systems and networks regularly	\boxtimes		
12	Support information security with organizational policies and programs	\boxtimes		
Appendix A1	Additional PCI DSS Requirements for Multi- Tenant Service Providers	\boxtimes		
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections	×		











