

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: IXOPAY GmbH

Date of Report as noted in the Report on Compliance: 28.11.2025

Date Assessment Ended: 27.11.2025



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.

Don't 4. Control Informatio				
Part 1. Contact Information				
Part 1a. Assessed Entity (ROC Section 1.1)				
Company name:	IXOPAY GmbH			
DBA (doing business as):	IXOPAY			
Company mailing address:	Vorgartenstrasse 206c, 1020 Vienna, Austria			
Company main website:	https://www.ixopay.com			
Company contact name:	John Noltensmeyer			
Company contact title:	CISO			
Contact phone number:	+43-1-353-0505			
Contact e-mail address:	j.noltensmeyer@ixopay.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:	Dot.Bit d.o.o.			
Company mailing address:	Stubicka 48A, 10110 Zagreb, Croatia			
Company website:	https://dotbit.eu			
Lead Assessor name:	Branimir Pacar			
Assessor phone number:	+385 99 2265696			
Assessor e-mail address:	branimir.pacar@dotbit.eu			
Assessor certificate number:	QSA: 203-884, 3DS QSA:1100-141, QPA:1300-201			



Part 2. Executive Summary						
Part 2a. Scope Verification						
Services that were <u>INCLUDED</u> in the scope of the Assessment (select all that apply):						
Name of service(s) assessed:	Name of service(s) assessed: Payment Processing and payment card tokenization					
Type of service(s) assessed:						
Hosting Provider: Applications / software Hardware Infrastructure / Network Physical space (co-location) Storage Web-hosting services Security services 3-D Secure Hosting Provider Multi-Tenant Service Provider Other Hosting (specify):	Managed Services: Systems security services IT support Physical security Terminal Management System Other services (specify):	Payment Processing: ☐ POI / card present ☑ Internet / e-commerce ☐ MOTO / Call Center ☐ ATM ☐ Other processing (specify):				
Account Management	☐ Fraud and Chargeback	☐ Payment Gateway/Switch				
☐ Back-Office Services	☐ Issuer Processing	☐ Prepaid Services				
☐ Billing Management	☐ Loyalty Programs	Records Management				
☐ Clearing and Settlement	☐ Merchant Services	☐ Tax/Government Payments				
☐ Network Provider						
☑ Others (specify): Payment Processing and payment card tokenization						
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: Not applicable Type of service(s) not assessed: **Hosting Provider: Managed Services: Payment Processing:** POI / card present Applications / software Systems security services ☐ Hardware ☐ IT support ☐ Internet / e-commerce ☐ Infrastructure / Network ☐ Physical security ☐ Terminal Management System \square ATM ☐ Physical space (co-location) ☐ Storage ☐ Other services (specify): ☐ Other processing (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 ☐ Merchant Services ☐ Tax/Government Payments □ Network Provider Others (specify): Provide a brief explanation why any checked services Not applicable 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 IXOPAY hosts and maintains a solution that allows clients to vault sensitive primary account numbers transmits account data. (PANs) and tokenize them. Cardholder data is directly transmitted to the IXOPAY Vault via the iframe payment form or the direct server-to-server API. The token is returned to the merchant for future reference. Merchants may utilize their tokens to initiate one-off payments, or use them for recurring payments at any time of their choosing. IXOPAY also offers encryption and tokenization of PAN data in bulk to satisfy migration needs of its clients.



Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.	IXOPAY is a payment orchestration platform, that handles large volumes of cardholder data on a daily basis. Besides direct transmission, processing, storage, and the implementation of controls and processes to protect such data handling, IXOPAY has no further involvement in the security of cardholder data.
Describe system components that could impact the security of account data.	IXOPAY GmbH provides the payment orchestration solution to the customers and provides the payment service that requires them to collect cardholder data. Cardholder data is only temporarily stored while transaction is being processed except in the case of recurring transactions where the PAN number is stored for a longer period of time. No sensitive data is stored after the transaction is authorized. PAN is stored only in an encrypted form as part of the tokenization mapping table. All encryption operations utilize Hashicorp Vault and HSM.



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.

IXOPAY is receiving cardholder data through APIs. All connections are sent through the load balancer and are forwarded to the front-end web servers. The web servers are encrypting the primary account number and sensitive authentication data (CVVs) using an HSM system before storage. The entry is stored together with a randomly generated token, which is later used for identification of the transaction. The token generation is not based upon any cardholder data. Knowledge of a token does not provide any information about the underlying payment data. After the data has been encrypted it is stored in the database.

The authorization of transactions is initiated by the payment gateway and the merchant using the payment token. The authorization is received on the load balancers, forwarded to a separate tier of web servers, which decrypt the data from the database using the HSM and prepare the transaction for processing at the payment processor. The result will be returned to the payment gateway and the merchant. After decryption of the cardholder data, sensitive authentication data (CVV) will be deleted and is no longer stored in the database. Encrypted PANs are only stored for recurring transactions.

Indicate whether the environment includes segmentation to reduce the scope of the	⊠ Yes	☐ No
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)	
Example: Data centers	3	Boston, MA, USA	
Data center	2	Vienna, Austria	
Corporate office	1	Vienna, Austria	

Security Standards Council					



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
Duraide the following information appealing cash items the patitive cash from DOLCCOL Lists of Validated

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
				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)) ☐ Yes ☐ No				
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 laaS, PaaS, SaaS, and FaaS cloud providers)				
Could impact the security of the e remote access, and/or bespoke s		CDE (for example, vendors providing support via developers).	☐ Yes ⊠ No	
If Yes:				
Name of Service Provider:		Description of Services Provided:		
ACI Worldwide (Germany) GmbH - F Adyen N.V. Bankart D.O.O. Cardtech Card & POS Service Gmbh (Concardis) CashFlows Europe Limited CKB Bank CKO Technology Services Ltd DBA Checkout.com Clearhaus A/S Coriunder Limited Credorax Bank Ltd Pay Plug (Dalenys Payment) Diners E-Comprocessing Ltd. E-xact Transactions EBANX S.A. ECommPay LTD.DBA: ECommPay I EmerchantPay via IPG Europe Limited Worldline SE Germany Euronet Worldwide Europe EFT Fivespot Kenya Limited DBA iPayAfr	T;	Payment processing		
Flutterwave Technology Solutions Ltd GlobalConnect Services BV (Ingenic Inatec Payment AG DBA Powercash JPMorgan Chase& Co Kount Inc KSG Kartenverrechnungs- und Servi GmbH DBA CardComplete	o) 21	Payment processing		



Mercury Processing Services International d.o.o DBA NestPay

MultiSafepay B.V.

Network Merchants, LLC (aka NMI)

Paydoo Payments UAB

Monext SAS

Paymentwall B.V.

Paysafe Processing Ltd

PXP Financial Group Ltd (DBA PXP

Accept GmbH)

Qualpay Inc.

Safecharge International Group Ltd.

Secure Trading Limited (dba Trust

Payments)

Sia Decta DBA DECTA

Worldline SA

Spreedly, Inc.

Stripe Inc

TabaPay, Inc

Transact.eu

Truevo Technologies Limited

Ukranian Processing Center (UPC)

Vindicia Inc.

WorldPay (UK) Ltd.

Silverflow B.V.

VÖB-ZVD Processing GmbH DBA

Deutsche Bank

Braintree, a PayPal Service

Market Pay Denmark

AltPayNet Corp.

Zooz Mobile Ltd DBA PaymentsOs / PayU

Payone GmbH

Valitor hf.

Francisco Sancha 12

Mastercard Payment Gateway Services

2C2P Pte. Ltd.

GlobalBlue SA

Payfort / Amazon Payment Services

PAYGENT Co., Ltd.

Nexi Payments S.p.A

Eftex Pty Ltd

Mercado Libre, Inc.

Areeba Iraq

Areeba Verto

Cybersource Corporation

First Atlantic Commerce Ltd.

Tillpayments

Infibeam Avenues Limited

Alignet

Payment processing



JCC Payment Systems	
Limited	
Maxpay limited	
Nexi Germany GmbH	
Bambora AB	
Eprocess International Ghana Limited	
NextLayer	Data center provider

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: Payment Processing and payment card tokenization

PCI DSS Requirement	More than on	Select If a Compensating Control(s) Was			
	In Place	Not Applicable	Not Tested	Not in Place	Used
Requirement 1:	\boxtimes				
Requirement 2:	\boxtimes	\boxtimes			
Requirement 3:	\boxtimes	\boxtimes			
Requirement 4:	\boxtimes	\boxtimes			
Requirement 5:	\boxtimes	\boxtimes			
Requirement 6:	\boxtimes	\boxtimes			
Requirement 7:	\boxtimes				
Requirement 8:	\boxtimes	\boxtimes			
Requirement 9:	\boxtimes	\boxtimes			
Requirement 10:	\boxtimes				
Requirement 11:	\boxtimes	\boxtimes			
Requirement 12:	\boxtimes	\boxtimes			
Appendix A1:		\boxtimes			
Appendix A2:					
Justification for	Annroach				



For any Not Applicable responses, identify which subrequirements were not applicable and the reason.

- 2.2.5 Not applicable, Ixopay is not using insecure services, protocols or daemons
- 2.3.1 Not applicable, Ixopay does not have wireless networks in PCI DSS scope.
- 2.3.2 Not applicable, Ixopay does not have wireless networks in PCI DSS scope.
- 3.3.1.1 Not applicable, Ixopay does not receive any track data.
- 3.3.1.3. Not applicable, Ixopay does not receive any PIN data.
 - 3.3.3 Not applicable, Ixopay is not an issuer and does not support issuing services.
- 3.5.1.1 Not applicable, Ixopay is not using hashing to render PANs unreadable
- 3.5.1.2 Not applicable, Ixopay does not use disk level encryption for protecting PAN.
- 3.5.1.3 Not applicable, Ixopay does not use disk level encryption for protecting PAN.
- 4.2.1.2 Not applicable, Ixopay does not have any wireless networks connected to the cardholder data environment.
- 4.2.2 Not applicable, Ixopay does not use end-user messaging technologies for sending PANs.
- 5.3.3 Not applicable, Ixopay does not use removable media in cardholder data environment.
- 6.4.1 Not applicable, this requirement is superseded.
- 8.2.3 Not applicable, Ixopay does not have a remote access to customers premises
 - 8.2.7 Not applicable, Ixopay does not have third parties that are accessing cardholder data environment.
 - 8.3.10 Not applicable, this requirement is superseded.
 - 8.3.10.1 Not applicable, consumers are not accessing cardholder data.
- 9.2.2 Not applicable, there are no publicly accessible network jacks within the facility.
- 9.2.3 Not applicable, there are no wireless access points in facility hosting cardholder data environment.
 - 9.4.1 Not applicable, Ixopay does not have offline media backups with cardholder data.
- 9.4.1.1 Not applicable, Ixopay does not have offline media backups with cardholder data.
- 9.4.1.2 Not applicable, Ixopay does not have offline media backups with cardholder data.
- 9.4.3 Not applicable, Ixopay does not have media with cardholder data that is sent outside the facility.
- 9.4.4 Not applicable, Ixopay does not have media with cardholder data that is sent outside the facility.
- 9.4.6 Not applicable, Ixopay does not have any hard copy materials containing cardholder data.
- 9.5.1 Not applicable, Ixopay does not have any POI devices.
- 9.5.1.1 Not applicable, Ixopay does not have any POI devices.



	9.5.1.2 Not applicable, Ixopay does not have any POI devices.				
	9.5.1.2.1 Not applicable, Ixopay does not have any POI devices.				
	9.5.1.3 Not applicable, Ixopay does not have any PO devices.				
	11.4.7 Not applicable, Ixopay is not a multitenant service provider.				
	12.3.2 Not applicable, Ixopay is not using customized approach.				
	A1 Not applicable, Ixopay is not a multitenant service provider.				
	A2 Not applicable, Ixopay is not using POS POI terminals.				
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:	2025-09-09
Note: This is the first date that evidence was gathered, or observations were made.	
Date Assessment ended:	2025-11-27
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)

		in the ROC dated (Date of Report as noted in the ROC 2025-11-28).					
⊠ Ful	•	PCI DSS assessment was completed: ts have been assessed and therefore no requirements were marked					
		e requirements have not been assessed and were therefore marked uirement not assessed is noted as Not Tested in Part 2g above.					
	olicable, assert(s) the following c	e ROC noted above, each signatory identified in any of Parts 3b-3d, ompliance status for the entity identified in Part 2 of this document					
	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 IXOPAY GmbH 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: Y	YY-MM-DD					
	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 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 John Noltensmeyer Signature of Service Provider Executive Officer ↑ Date: 2025-11-28 Service Provider Executive Officer Name: John Noltensmeyer Title: CISO 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: Date: 2025-11-28 Signature of Lead QSA Lead QSA Name: Branimir Pacar Signature of Duly Authorized Officer of QSA Company 1 Date: 2025-11-28 Duly Authorized Officer Name: Tomislav Zivkovic QSA Company: Dot.Bit d.o.o. 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
		YES	NO	Requirement)
1	Install and maintain network security controls	\boxtimes		
2	Apply secure configurations to all system components			
3	Protect stored account data	\boxtimes		
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	\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			
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/