



Payment Card Industry Data Security Standard v1.2

Report on Compliance

Presented To:

Shift4

BID: 10055676

Date: May 12, 2009

Prepared By:

Arthur B. Cooper Jr.

Phone: (719) 640-7223

acooper@trustwave.com

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V 5.0

1 EXECUTIVE OVERVIEW

Shift4 has contracted with Trustwave to perform a Payment Card Industry (PCI) assessment to determine the compliance of their facilities with major Card Companies' published PCI security guidelines and requirements.

The PCI assessment process focuses solely on the security of cardholder data, whether Shift4 has effectively implemented information security policies and processes, and if there are adequate security measures to comply with the requirements to protect cardholder data. Additionally, the assessment reviews whether Shift4 is employing payment industry best-practices and provides recommendations for remediation of any non-compliant policies, processes, procedures, system configurations or vulnerabilities. This is ONLY an assessment and does NOT include professional services for remediation efforts.

As a result of this assessment, it was determined that Shift4 is **COMPLIANT** with PCI security requirements.

A summary of Shift4's "overall" compliance with card industry guidelines and requirements is provided in Table 1-1.

Table 1-1. Shift4 Overall PCI Compliance Summary

| Section Number | PCI Section Title | Overall Compliance | Reference |
|----------------|---|--------------------|-----------------------|
| 1 | Install and maintain a firewall configuration to protect data. | YES | Section 7.1, page 16 |
| 2 | Do not use vendor-supplied defaults for system passwords and other security parameters. | YES | Section 7.2, page 24 |
| 3 | Protect Stored Data. | YES | Section 7.3, page 30 |
| 4 | Encrypt transmission of cardholder and sensitive information across public networks. | YES | Section 7.4, page 45 |
| 5 | Use and regularly update anti-virus software. | YES | Section 7.5, page 48 |
| 6 | Develop and Maintain Secure Systems and Applications. | YES | Section 7.6, page 50 |
| 7 | Restrict access to data by business need-to-know. | YES | Section 7.7, page 65 |
| 8 | Assign a unique ID to each person with computer access. | YES | Section 7.8, page 67 |
| 9 | Restrict physical access to cardholder data. | YES | Section 7.9, page 77 |
| 10 | Track and monitor all access to network resources and cardholder data. | YES | Section 7.10, page 84 |
| 11 | Regularly test security systems and processes. | YES | Section 7.11, page 92 |

| | | | |
|----|--|------------|-----------------------|
| 12 | Maintain a policy that addresses information security for employees and contractors. | YES | Section 7.12, page 98 |
|----|--|------------|-----------------------|

Shift4 acknowledges that completion of the PCI assessment and a finding of "compliant" will not prevent a compromise of cardholder data on any of Shift4's systems, and any subsequent card company fines. Shift4 further acknowledges that this assessment only addresses compliance against requirements identified at the time of assessment.

2 CONTACT INFORMATION AND REPORT DATE

2.1 Contact Information

The primary Trustwave contact for this report is Mr. Al Hannagan, who can be reached at Compliance-OA@trustwave.com.

Table 2-1. Shift4 Contact Information

| Shift4 Contact Information |
|---|
| JD Oder II |
| VP, Research & Development/CTO, Founder |
| Shift4 |
| 1491 Center Crossing Road |
| Las Vegas, Nevada 89144-7047 |
| Phone: (702) 597-2480 |
| jd@shift4.com |
| http://www.Shift4.com |

Table 2-2. PCI Assessor Information

| PCI Assessor Contact Information |
|---|
| Arthur B. Cooper Jr. |
| Trustwave |
| 116 Defense Hwy., Suite 501 |
| Annapolis, MD 21401 |
| Phone: (719) 640-7223 |
| acooper@trustwave.com |
| http://www.trustwave.com |

2.2 Report Date

This Report on Compliance was completed by Trustwave on **May 12, 2009**.

3 EXECUTIVE SUMMARY

3.1 Business Description

Shift4 supplies electronic payment switching, accounting and high-speed financial transaction connectivity to diverse merchants worldwide using the Application Service Provider (ASP) model. This is accomplished through the use of a comprehensive Application Program Interface (API) that connects popular point-of-sale (POS) and property management system (PMS) applications to credit, debit and private label processors.

Shift4 provides enterprise-wide payment processing solutions for "Card-Present" credit and debit transactions and "Card-Not-Present" credit transactions. Shift4 serves as a real-time payment gateway operating between customer POS systems and their bank/processor accounts while providing "Back-Office" settlement and reporting services. All PIN-Block data for debit transactions merely passes through the Shift4 environment from the merchant's originating POS system to the upstream service provider. PIN data remains unchanged and encrypted end-to-end. PIN data remains encrypted from the merchant's POS system, through the Shift4 environment, and remains encrypted until it is received by the upstream processor it is sent to by Shift4. At no time does Shift4 manipulate, write, or decrypt the encrypted PIN data. For this reason, the card brands do not require Shift4 to undergo TG3 or Visa PIN audits.

Shift4 utilizes an architecture known as "Dollars-On-The-Net" (\$OTN). The \$OTN production system includes transaction processing systems and the web infrastructure providing customer management and report functions. All transaction data is processed via additional upstream service providers, acquirers, or through direct connectivity to American Express.

Shift4 also provides merchant-side API components known as NetAPI, Universal Transaction Gateway (UTGv2) and the 4Go SecureSuite. These merchant components are designed to work with a multitude of customer POS systems. Shift4 operates out of headquarters and data center facilities located in Las Vegas, Nevada.

3.2 Entity Classification

For purposes of this assessment, Shift4 is classified as a Level 1 Service Provider. This is based on the number of transactions accomplished by Shift4 on behalf of its merchant customers. Currently, Shift4 processes approximately 400 Million transactions annually.

3.3 Disclosure of Products and Services that Trustwave provides to Shift4

Trustwave provides external PCI-DSS scanning and penetration testing services to Shift4 in addition to annual PCI-DSS assessment services.