



# **Payment Card Industry Data Security Standard**

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## **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: Revel Systems, Inc.**

**Date of Report as noted in the Report on Compliance: November 19, 2025**

**Date Assessment Ended: November 19, 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.

#### Part 1. Contact Information

##### Part 1a. Assessed Entity (ROC Section 1.1)

Company name:	Revel Systems, Inc.
DBA (doing business as):	Not Applicable
Company mailing address:	600 Peachtree St. NE, Floor 38, Atlanta, GA 30308
Company main website:	<a href="https://www.revelsystems.com">https://www.revelsystems.com</a>
Company contact name:	Andrew Soriano
Company contact title:	Director, Enterprise Security and Compliance
Contact phone number:	949-307-7912
Contact e-mail address:	<a href="mailto:asoriano@shift4.com">asoriano@shift4.com</a>

##### 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):	<b>Not Applicable</b>
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##### Qualified Security Assessor

Company name:	UHY Consulting, Inc.
Company mailing address:	980 Hammond Dr #100, Atlanta, GA 30328
Company website:	<a href="http://www.uhy-us.com">www.uhy-us.com</a>
Lead Assessor name:	Jamison See
Assessor phone number:	248-204-9477
Assessor e-mail address:	<a href="mailto:jsee@uhy-us.com">jsee@uhy-us.com</a>
Assessor certificate number:	QSA – 204-445

## 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:	Revel POS, Inventory Management, and Online Ordering System	
Type of service(s) assessed:		
<b>Hosting Provider:</b> <input checked="" type="checkbox"/> Applications / software <input checked="" type="checkbox"/> Hardware <input type="checkbox"/> Infrastructure / Network <input checked="" type="checkbox"/> Physical space (co-location) <input checked="" type="checkbox"/> Storage <input type="checkbox"/> Web-hosting services <input checked="" type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input type="checkbox"/> Multi-Tenant Service Provider <input type="checkbox"/> Other Hosting (specify): Not Applicable	<b>Managed Services:</b> <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): Not Applicable	<b>Payment Processing:</b> <input type="checkbox"/> POI / card present <input type="checkbox"/> Internet / e-commerce <input type="checkbox"/> MOTO / Call Center <input type="checkbox"/> ATM <input type="checkbox"/> Other processing (specify): Not Applicable
<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): Not Applicable		

**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:	Installation and Implementation	
Type of service(s) not assessed:		
<b>Hosting Provider:</b> <input type="checkbox"/> Applications / software <input checked="" type="checkbox"/> Hardware <input type="checkbox"/> Infrastructure / Network <input type="checkbox"/> Physical space (co-location) <input type="checkbox"/> Storage <input type="checkbox"/> Web-hosting services <input type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input type="checkbox"/> Multi-Tenant Service Provider <input type="checkbox"/> Other Hosting (specify): Not Applicable	<b>Managed Services:</b> <input checked="" type="checkbox"/> Systems security services <input checked="" type="checkbox"/> IT support <input type="checkbox"/> Physical security <input type="checkbox"/> Terminal Management System <input type="checkbox"/> Other services (specify): Not Applicable	<b>Payment Processing:</b> <input type="checkbox"/> POI / card present <input type="checkbox"/> Internet / e-commerce <input type="checkbox"/> MOTO / Call Center <input type="checkbox"/> ATM <input type="checkbox"/> Other processing (specify): Not Applicable
<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): Not Applicable		
Provide a brief explanation why any checked services were not included in the Assessment:	These services are subservices of the primary POS service.	

**Part 2b. Description of Role with Payment Cards  
(ROC Sections 2.1 and 3.1)**

Describe how the business stores, processes, and/or transmits account data.	The company does not store, process, or transmit cardholder data. The company provides an order and inventory management application that connects to the customer's payment devices.
Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.	The company's application is connected to the customer's in-scope PCI environment and payment processor.
Describe system components that could impact the security of account data.	The company's application is connected to the customer's in-scope PCI environment and payment processor.

## Part 2. Executive Summary (continued)

### 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.*

The company's POS and online ordering solution does not store, process, and/or transmit cardholder data. The POS solution connects to a third-party payment system to process credit card transactions. The company's solution sends order information to the third-party payment system which processes the transactions. The third-party payment system sends back a payment message (pass or fail) to the company's POS or online ordering solution.

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)
Corporate Offices	4	Atlanta, GA, USA San Francisco, CA, USA Vilnius, Lithuania London, United Kingdom
Data Center - AWS	1	Virginia, USA

## Part 2. Executive Summary (continued)

### 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
Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable

\* 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](http://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.

\* 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](http://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.

## Part 2. Executive Summary (continued)

### 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:

<ul style="list-style-type: none"> <li>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))</li> </ul>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> <li>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)</li> </ul>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> <li>Could impact the security of the entity's CDE (for example, vendors providing support via remote access, and/or bespoke software developers).</li> </ul>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

#### If Yes:

Name of Service Provider:	Description of Services Provided:
AWS	Third-party hosting for in-scope environment
Alert Logic	Log review and IDS

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

## Part 2. Executive Summary (continued)

### 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:** Revel POS, Inventory Management, and Online Ordering System

PCI DSS Requirement	Requirement Finding				Select If a Compensating Control(s) Was Used
	In Place	Not Applicable	Not Tested	Not in Place	
Requirement 1:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 2:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 3:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 4:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 5:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 6:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 7:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 8:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Requirement 9:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 10:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 11:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 12:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Appendix A1:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Appendix A2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Appendix A3:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Justification for Approach

<p>For any Not Applicable responses, identify which sub-requirements were not applicable and the reason.</p>	<p>1.2.4 - There are no cardholder data in-scope environments. Cardholder data is not transferred from the client environment to the company's environment.</p> <p>1.3.3, 1.4.4 - There is no cardholder data in the environment.</p> <p>2.3.1, 2.3.2 - The environment is hosted at AWS, there are wireless environments connected to the in-scope systems or transmitting cardholder data. Requirement</p> <p>3 &amp; 4 - Cardholder data is not collected as part of the service offering.</p> <p>5.2.3.1 – All in-scope systems had anti-malware software installed. No systems were identified as not at risk for malware.</p> <p>5.3.2.1 – Periodic malware scanning was not used to meet Requirement 5.3.2.</p> <p>6.4.1 - This requirement was superseded by Requirement 6.4.2.</p> <p>6.4.3 - There are no payment pages provided by the organization as part of the service offering.</p> <p>6.5.2 - There were no significant changes within the past 12 months.</p> <p>7.2.6 - The company does not maintain any databases that stored cardholder data.</p> <p>8.2.3 - The organization does not have remote access to the customer premises.</p> <p>8.2.7 - There are no third parties with access to the in-scope environment.</p> <p>8.3.10, 8.3.10.1 - There are no non-consumer customers access to the in-scope environment.</p> <p>8.6.1, 8.6.2, 8.6.3 – There are no system or application accounts with interactive logins.</p> <p>9.4.1, 9.4.1.1, 9.4.1.2, 9.4.2, 9.4.3, 9.4.4, 9.4.5, 9.4.5.1, 9.4.6, 9.4.7 - Cardholder data is not collected as part of the service offering.</p> <p>9.5.1, 9.5.1.1, 9.5.1.2, 9.5.1.2.1, 9.5.1.3 - It is the responsibility of the client to physically secure, monitor, and maintain payment capture devices within the client environment.</p> <p>10.2.1.1 - The company does not store cardholder data within the in-scope environment.</p> <p>10.4.2.1 – All systems are treated the same and reviewed at the same frequency.</p>
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## Part 2. Executive Summary (continued)

	<p>10.7.1 – This requirement has been superseded by Requirement 10.7.2.</p> <p>12.3.2 - The organization is not using the customized approach to meet any of the PCI DSS requirements.</p> <p>12.5.3 – No significant changes to the organization structure in the last year.</p> <p>Appendix A - The organization is not a shared hosting provided.</p> <p>Appendix B - SSL / early TLS are not used for POS POI terminal connections.</p>
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: <i>Note: This is the first date that evidence was gathered, or observations were made.</i>	October 13, 2025
Date Assessment ended: <i>Note: This is the last date that evidence was gathered, or observations were made.</i>	November 19, 2025
Were any requirements in the ROC unable to be met due to a legal constraint?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were any testing activities performed remotely?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

## Section 3 Validation and Attestation Details

### Part 3. PCI DSS Validation (ROC Section 1.7)

**This AOC is based on results noted in the ROC dated (Date of Report as noted in the ROC November 19, 2025).**

Indicate below whether a full or partial PCI DSS assessment was completed:

**Full Assessment** – All requirements have been assessed and therefore no requirements were marked as Not 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.

Based on the results documented in the ROC noted above, each signatory identified in any of Parts 3b-3d, as applicable, 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 *(Revel Systems, 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 *(Revel Systems, Inc.)* has not demonstrated compliance with PCI DSS requirements.

**Target Date** for Compliance: Not Applicable

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 *(Revel Systems, Inc.)* 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)

<input checked="" type="checkbox"/>	The ROC was completed according to <i>PCI DSS</i> , Version 4.0.1 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 the Assessment in all material respects.
<input checked="" type="checkbox"/>	PCI DSS controls will be maintained at all times, as applicable to the entity's environment.

#### Part 3b. Service Provider Attestation

**Andrew Soriano**

 Digitally signed by Andrew Soriano  
Date: 2025.11.26 07:57:57 -08'00'

Signature of Service Provider Executive Officer ↑	Date: November 26, 2025
Service Provider Executive Officer Name: Andrew Soriano	Title: Director, Enterprise Security and Compliance

#### 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



Signature of Lead QSA ↑	Date: November 26, 2025
Lead QSA Name: Jamison See	



Signature of Duly Authorized Officer of QSA Company ↑	Date: November 26, 2025
Duly Authorized Officer Name: Ben Hunter III	QSA Company: UHY Consulting, Inc.

#### Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement

If an ISA(s) was involved or assisted with this Assessment, indicate the role performed:

ISA(s) performed testing procedures.

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 Requirement)
		YES	NO	
1	Install and maintain network security controls	<input type="checkbox"/>	<input type="checkbox"/>	N/A
2	Apply secure configurations to all system components	<input type="checkbox"/>	<input type="checkbox"/>	
3	Protect stored account data	<input type="checkbox"/>	<input type="checkbox"/>	
4	Protect cardholder data with strong cryptography during transmission over open, public networks	<input type="checkbox"/>	<input type="checkbox"/>	
5	Protect all systems and networks from malicious software	<input type="checkbox"/>	<input type="checkbox"/>	
6	Develop and maintain secure systems and software	<input type="checkbox"/>	<input type="checkbox"/>	
7	Restrict access to system components and cardholder data by business need to know	<input type="checkbox"/>	<input type="checkbox"/>	
8	Identify users and authenticate access to system components	<input type="checkbox"/>	<input type="checkbox"/>	
9	Restrict physical access to cardholder data	<input type="checkbox"/>	<input type="checkbox"/>	
10	Log and monitor all access to system components and cardholder data	<input type="checkbox"/>	<input type="checkbox"/>	
11	Test security systems and networks regularly	<input type="checkbox"/>	<input type="checkbox"/>	
12	Support information security with organizational policies and programs	<input type="checkbox"/>	<input type="checkbox"/>	
Appendix A1	Additional PCI DSS Requirements for Multi-Tenant Service Providers	<input type="checkbox"/>	<input type="checkbox"/>	
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"/>	

*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/](https://www.pcisecuritystandards.org/about_us/)*