

Payment Card Industry Data Security Standard

Attestation of Compliance for Report on Compliance – Service Providers

Version 4.0

Revision 2

Publication Date: August 2023



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

Entity Name: Democrance DMCC

Assessment End Date: September 10, 2024

Date of Report as noted in the Report on Compliance: September 10, 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:	Democrance DMCC			
DBA (doing business as):	NA			
Company mailing address:	6 th Floor, One JLT, Jumeriah Lake Towers, Dubai, UAE.			
Company main website:	https://www.democrance.com/			
Company contact name:	Michele Grosso			
Company contact title:	CEO			
Contact phone number:	97144295831			
Contact e-mail address:	michele.grosso@democrance.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:	Prescient Security LLC			
Company mailing address: 1211 Main Street, Suite 1, Salmon, ID, 83467				
Company website:	https://prescientsecurity.com/			
Lead Assessor name:	Atulkumar Wable			
Assessor phone number:	+1 212-271-0175			
Assessor e-mail address:	sessor e-mail address: pci@prescientsecurity.com			
Assessor certificate number:	PCI DSS QSA, Certificate Number: 206-288			



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:	Payment Facilitator- Insurance Tech	Finance Solution				
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	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): Insurance Tech Finance Solution				
☐ 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): None						
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: N/A Type of service(s) not assessed: **Hosting Provider: Payment Processing: Managed Services:** ☐ Applications / software ☐ Systems security services ☐ POI / card present ☐ Hardware ☐ IT support ☐ Internet / e-commerce ☐ Infrastructure / Network ☐ Physical security ☐ MOTO / Call Center \square ATM ☐ Physical space (co-location) ☐ Terminal Management System Other services (specify): ☐ Storage 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 ☐ 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): None 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 Section 2.1) Describe how the business stores, processes, and/or Democrance utilizes a redirection method provided by the payment service provider (PSP) to collect the card transmits account data. holder data details to complete the authorization of payment card transactions. They receive only the successful or failure message from the payment processor. Democrance utilizes 2C2P, Payfort and Cybersource for providing the payment processing service. The transmission and processing of cardholder data is handled by the payment processor through an HTTPS encrypted channel.



Democrance does not store any cardholder data information in their environment, so entity will not be having any access to cardholder data once the payment is completed.

Transmission of CHD

Democrance utilizes a redirection method provided by the payment service provider (PSP) to securely collect cardholder data for completing the capture and authorization of transactions. Democrance only receives a success or failure message from the payment processor after the transaction is completed. Democrance contracts with 2C2P, PayFort, and CyberSource for payment processing services. All transmissions to the PSP are through HTTPS encrypted tunnels, ensuring secure communication.

Processing of CHD

All processing of cardholder data transactions was handled by the payment processors.

Storage of CHD

Democrance does not store any cardholder data information in their environment and entity had no access to cardholder data.

Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data. Democrance is an insurance tech finance solution company which helps their customers by providing a platform to collect payments to purchase policies.

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

The primary component of the Democrance systems that impact the security of CHD are the web application services that contain the payment checkout pages. The checkout pages transmit the CHD from the consumer browser session, through the Democrance web application service, and then to the payment gateways for transaction authorization and settlement, as well as tokenization for use in referencing payment methods for future or recurring transactions.



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.

Democrance DMCC (hereafter referred as 'Democrance') is an insurance tech finance solution company which helps their customers by providing a data-enabled SaaS platform that helps insurers and insurance partners to increase digital sales and access new markets. Democrance's platform is constantly evolving to support different personal and commercial insurance products of varying underwriting complexity. Democrance platform's flexibility, coupled with the platform's digital and mobile capabilities, allows insurers to target customers from the high value end all the way down to untapped population segments using one single tool.

Democrance creates value by fully digitizing and automating the entire value chain of insurance from sales to claims management: customers can purchase an insurance product using their phone, while insurance companies can manage the policies through the platform's back end with minimum effort. Democrance has hosted their infrastructure on AWS, Azure and Oracle cloud platform in different regions for their different customers based on their request. Democrance web application is developed and maintained by the internal team.

	☐ 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)	
Amazon Web Services (AWS) (IaaS)	5	N. Virginia, Ireland, Singapore, Africa, UAE	
Azure (laaS	2	UAE North, Japan East	
OCI (laaS)	1	me-jeddah-1	



Part 2. Executive Summary (continued)

Part 2e. PCI SSC Validated Products and Solutions (ROC Section 3.3)

Does the	entity use any ite	m identified on	any PCI S	SSC Lists o	f Validated	Products ar	d 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 PCI SSC Standard to Which Product or Solution 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)—for example, 3DS Software Development Kits, Approved PTS Devices, Validated Payment Software, Payment Applications (PADSS), Point to Point Encryption (P2PE) solutions, Software-Based PIN Entry on COTS (SPoC) solutions, and Contactless Payments on COTS (CPoC) solutions.



Part 2f. Third-Party Service Providers (ROC Section 4.4)

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

(ROC Section 4.4)						
For the services being validated, does the enthat:	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))					
network security control services, anti-ma	 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). 					
If Yes:						
Name of Service Provider:	Description of Services Provided:					
Amazon Web Services Inc.	Infrastructure as a Service (laaS)					
Google Workspace	SSO					
Oracle	Oracle Infrastructure as a Service (IaaS)					
Microsoft Azure Infrastructure as a Service (IaaS)						
2c2p Payment Gateway Service Provider						
CyberSource Payment Gateway Service Provider						
Payfort Payment Gateway Service Provider						



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.

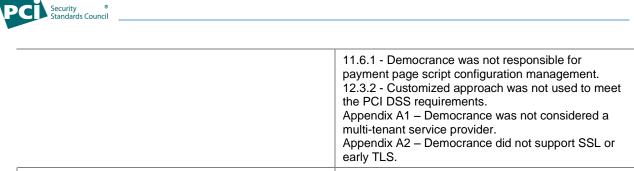
Note: One table to be completed for each service covered by this AOC. Additional copies of this section are available on the PCI SSC website.

Name of Service Assessed: Payment Facilitator

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	
Requirement	In Place	Not Applicable	Not Tes	ted	Not in Place	Customized Approach	Compensating Controls
Requirement 1:	\boxtimes						
Requirement 2:	\boxtimes						
Requirement 3:	\boxtimes						
Requirement 4:	\boxtimes						
Requirement 5:	\boxtimes	\boxtimes					
Requirement 6:	\boxtimes	\boxtimes					
Requirement 7:	\boxtimes						
Requirement 8:	\boxtimes						
Requirement 9:	\boxtimes						
Requirement 10:	\boxtimes						
Requirement 11:							
Requirement 12:	\boxtimes						
Appendix A1:							
Appendix A2:							
Justification for Approach							
For any Not Applicable responses, identify which sub-requirements were not applicable and the reason. 1.2.6 – Democrance did not support the use of insecure services, protocols, or ports. 1.3.3 - Democrance did not support wireless environments that connected to the CDE. 1.4.4 - Democrance did not support the use of insecure services, protocols, or ports. 1.3.3 - Democrance did not support the use of insecure services, protocols, or ports. 1.4.4 - Democrance did not support the use of insecure services, protocols, or ports. 1.4.4 - Democrance did not support the use of insecure services, protocols, or ports. 1.4.4 - Democrance did not support the use of insecure services, protocols, or ports.							



- 2.2.5 Democrance did not support insecure services, daemons, or protocols.
- 2.3.1, 2.3.2 Democrance did not support wireless environments that connect to the CDE.
- 3.2.1 Democrance did not directly store CHD.
- 3.3.1 Democrance did not receive or store SAD.
- 3.3.1.1 Democrance did not accept full track data as a data variable.
- 3.3.1.2 CVV was not sent nor stored in the Democrance databases.
- 3.3.1.3 PIN data couldn't be sent to Democrance.
- 3.3.2 SAD data was not received by Democrance.
- 3.3.3 Democrance was not an issuer and did not support issuing services.
- 3.4.1 Democrance did store CHD and therefore could not display cardholder data.
- 3.4.2 Democrance had not yet implemented this future dated requirement.
- 3.5.1, 3.5.1.1, 3.5.1.2, 3.5.1.3, 3.7.1-3.7.9 Democrance did not directly store CHD.
- 4.2.1.2 Democrance did not support wireless environments that connect to the CDE.
- 4.2.2 Democrance did not use end-user messaging technologies to send cardholder data.
- 5.2.3 All workstations were protected by anti-virus software.
- 5.2.3.1, 5.3.2.1, 5.3.3, 5.4.1 Democrance had not yet implemented this future dated requirement.
- 6.4.3 Democrance had not yet implemented this future dated requirement.
- 6.5.2 Democrance had no significant changes during the assessment period.
- 7.2.6 Democrance did not directly store CHD.
- 8.2.2 Democrance did not use shared authentication credentials.
- 8.2.3 Democrance did not have remote access to customer premises.
- 8.3.10, 8.3.10.1 Democrance customers were not provided access to account data.
- 8.6.1, 8.6.2, 8.6.3 This future dated requirement has not yet been implemented.
- 9.4.1-9.4.7 Democrance did not store CHD in Physical media.
- 9.5.1, 9.5.1.1, 9.5.1.2, 9.5.1.2.1, 9.5.1.3 -
- Democrance was not responsible for the management of card reading devices.
- 10.2.1.1 Democrance did not directly store CHD.
- 11.2.2 Democrance does not support wireless access points within the cardholder data environment.
- 11.3.1.3, 11.3.2.1 There were no significant changes to the Democrance system components during the assessment year.
- 11.4.5, 11.4.6 Democrance did not rely on network segmentation to isolate the CDE.
- 11.4.7 Democrance clients are not required to perform external pentation testing of the services they use from Democrance.
- 11.5.1.1 This future dated requirement has not yet been implemented.



For any Not Tested responses, identify which subrequirements were not tested and the reason.

Not Applicable

(ROC Sections 1.2 and 1.3.2)

Interview personnel

Interactive testing

Other:

Examine/observe live data

Observe process being performed

Observe physical environment



Section 2 Report on Compliance

Date Assessment began: Note: This is the first date that evidence was gathered, or observations were made. Date Assessment ended: 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? If yes, for each testing activity below, indicate whether remote assessment activities were performed: ■ Yes □ No

☐ Yes

☐ Yes

☐ No

☐ No

☐ No

⊠ No

☐ No

⊠ No



Section 3 Validation and Attestation Details

Part 3. PCI DSS Validation (ROC Section 1.7)

ıaıı	3. I CI DOC Validation (IVO							
Indica For as	ate below whether a full or partial ull Assessment – All requiremen s Not Tested in the ROC. artial Assessment – One or more	in the ROC dated September 10, 2024. 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.						
as ap		ne ROC noted above, each signatory identified in any of Parts 3b-3d, compliance 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 <i>Democrance DMCC</i> , 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 <i>Not applicable</i> has not demonstrated compliance with PCI DSS requirements. Target Date for Compliance: <i>Not applicable</i> 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 mark as Not in Place due to a legal restriction that prevents the requirement from being met and all othe assessed requirements are marked as being either In Place or Not Applicable, resulting in an over COMPLIANT BUT WITH LEGAL EXCEPTION rating; thereby <i>Not applicable</i> has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above or as Not in P 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	Part 3a. Service Provider Acknowledgement					
_	atory(s) confirms: ct all that apply)					
	The ROC was completed according to PC instructions therein.	CI DSS, Version 4.0 a	and was completed according to the			
	All information within the above-reference Assessment in all material respects.	d ROC and in this at	testation fairly represents the results of the			
	PCI DSS controls will be maintained at all	times, as applicable	to the entity's environment.			
Part	3b. Service Provider Attestation					
	Mic	cusigned by: Lule Grosso				
Signa	ature of Service Provider Executive Officer	DFF2CE98AE44F	Date: 9/13/2024			
Servi	ce Provider Executive Officer Name: Miche	le Grosso	Title: CEO			
Part	3c. Qualified Security Assessor (QSA) A	cknowledgement				
	SA was involved or assisted with this ssment, indicate the role performed:	QSA performed t	esting procedures.			
ASSE	·	QSA provided of	her assistance. all role(s) performed:			
		ocuSigned by:	all fole(s) performed.			
	· · · · · · · · · · · · · · · · · · ·	Ukumar Wable				
Signa	ature of Lead QSA 1	F2BEFDC8CF4A0	Date: 9/13/2024			
Lead	QSA Name: Atulkumar Wable					
DocuSigned by: Kevin Whalen						
Signa	Signature of Duly Authorized Officer of QSA Company 1 Date: 9/13/2024					
Duly Authorized Officer Name: Kevin Whalen QSA Company: Prescient Security LLC						
Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement						
If an ISA(s) was involved or assisted with this ISA(s) performed testing procedures.			ed testing procedures.			
ASS0	ssment, indicate the role performed:	☐ ISA(s) provided other assistance.				
		It selected, describ	pe 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		nt to PCI sirements t 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				
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				











