

# Payment Card Industry (PCI) Data Security Standard

# Attestation of Compliance

Prepared for: Always There Communications, LLC, dba 1-800 Notify

Date: 10 June 2025



A-LIGN.COM

# 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: Always There Communications LLC, dba 1-800 Notify

Date of Report as noted in the Report on Compliance: 10 June 2025

Date Assessment Ended: 10 June 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:	Always There Communications LLC
DBA (doing business as):	1-800 Notify
Company mailing address:	7950 NW 53rd Street, Suite 341, Miami, Florida 33166
Company main website:	https://www.1-800notify.com
Company contact name:	Martin Trautschold
Company contact title:	CEO
Contact phone number:	+1 (386) 334-6434
Contact e-mail address:	martin@1-800notify.com
Part 1b Assessor	1

#### 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:	A-LIGN Compliance and Security, Inc. dba A-LIGN
Company mailing address:	400 N Ashley Drive Suite 1325, Tampa, Florida 33602 USA
Company website:	https://www.A-LIGN.com
Lead Assessor name:	Angelique Naylor
Assessor phone number:	+1 (888) 702-5446
Assessor e-mail address:	Angelique.naylor@A-LIGN.com
Assessor certificate number:	QSA, 206-235



# 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 IVR	
Type of service(s) assessed:		
Hosting Provider:	Managed Services:	Payment Processing:
Applications / software	Systems security services	POI / card present
Hardware	☐ IT support	Internet / e-commerce
Infrastructure / Network	Physical security	MOTO / Call Center
Physical space (co-location)	Terminal Management System	
☐ 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
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):

**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 2a. Scope Verification (continued)

Services that are provided by the service provider but were <u>NOT INCLUDED</u> in the scope of the Assessment (select all that apply):

Name of service(s) not assessed:	Not Applicable.		
Type of service(s) not assessed:	1		
Hosting Provider:	Managed Services	5:	Payment Processing:
Applications / software	Systems securit	y services	POI / card present
🗌 Hardware	IT support		Internet / e-commerce
Infrastructure / Network	Physical securit	у	MOTO / Call Center
Physical space (co-location)	🗌 Terminal Manag	gement System	🗆 АТМ
☐ 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 Processi	ng	Prepaid Services
Billing Management	Loyalty Program	าร	Records Management
Clearing and Settlement	Merchant Servio	ces	Tax/Government Payments
Network Provider			
Others (specify):	·		
Provide a brief explanation why any o	checked services	Not Applicable.	All services provided by 1-800 Notify

were not included in the Assessment:

Not Applicable. All services provided by 1-800 Notify were included within the scope of this assessment.

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.	1-800 Notify processes transactions on behalf of its clients. 1-800 Notify offers customized Phone Payment IVR (Interactive Voice Response) systems that are hosted on secure Virtual Private Networks in Amazon Web Services (AWS). Customers of 1-800 Notify's clients call into the payment IVR phone number and type in authentication information via their telephone keypad. Upon payment, the customer can choose to enter a credit card (PAN, CVV, and billing zip code for Address Verification Services - AVS) or bank account information (routing number and account number). The card data provided is not stored by 1-800 Notify but is transmitted in real-time during the call to PCI-compliant	



	payment providers for the purposes of generating a charge on the card for the amount selected and approved by the customer. 1-800 Notify performs encrypted backups to Amazon Web Services S3, which contain only secure tokens and related IVR Validation databases, but does not store CHD. The assessed environment consisted of multiple networks hosted within a PCI-compliant cloud service provider. Each network contained connections into and out of the CDE to support payment gateway connections. Critical system components include firewalls, routers, proxy servers, Fargate containers, and AWS RDS. NewRelic SIEM is used for logging and alerting. Network security enforcement includes an Internet Gateway, NAT gateway, Amazon security groups, network access control lists, perimeter firewalls, routers, and private VPCs.
Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.	1-800-Notify does not impact the security of account data in any other way outside of what is described above.
Describe system components that could impact the security of account data.	Not Applicable.

#### Part 2c. Description of Payment Card Environment

	1	
<ul> <li>Provide a high-level description of the environment covered by this Assessment.</li> <li>For example:</li> <li>Connections into and out of the cardholder data environment (CDE).</li> </ul>	The assessed environment consisted of multiple networks hosted within a PCI compliant cloud service provider (AWS). Each network contained connections into and out of the CDE to support IVR input and payment gateway connections.	
<ul> <li>Critical system components within the CDE, such as POI devices, databases, web servers, etc., and any other necessary payment components, as applicable.</li> <li>System components that could impact the security of account data.</li> </ul>	Network security enforcement and segmentation includes internet gateway, NAT gateway, security groups, network access control lists, and VPCs. Critical system components include load balancers, security groups, web servers,	
Indicate whether the environment includes segmentation to reduc	application servers, databases, and containers.         System components that could impact the security of account data include authentication services, monitoring, and alerting platforms.         uce 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)
Corporate Office	1	Miami, FL, USA
AWS Regions	1	US-East-1



### 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) (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 IaaS, PaaS, SaaS, and FaaS cloud providers)	🖾 Yes 🗌 No
•	Could impact the security of the entity's CDE (for example, vendors providing support via remote access, and/or bespoke software developers).	🗌 Yes 🖾 No

#### If Yes:

Name of Service Provider:	Description of Services Provided:
Amazon Web Services	Cloud Hosting Provider
NewRelic	SIEM
Bluefin	Payment Gateway
InstaMed (owned by JP Morgan Chase)	Payment Gateway
RevSpring	Payment Gateway
Global Payments / OpenEdge	Payment Gateway
TrustCommerce (Sphere)	Payment Gateway
ImagineSoftware	Payment Gateway
USA ePAY	Payment Gateway
WayStar	Payment Gateway
Note: Requirement 12.8 applies to all entities	s 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.

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

Name of Service Assessed: Payment IVR



<ul> <li>1.2.6: No insecure services, protocols, or ports were in use.</li> <li>1.4.4: 1-800 Notify does not store account data.</li> <li>1.4.5: Disclosure of private IP addresses was not permitted.</li> <li>2.2.5: No insecure services, protocols, or ports were in use.</li> </ul>
<ul><li>1.4.5: Disclosure of private IP addresses was not permitted.</li><li>2.2.5: No insecure services, protocols, or ports were</li></ul>
permitted. 2.2.5: No insecure services, protocols, or ports were
2.3.1; 2.3.2; 4.2.1.2: There were no wireless environments connected to the CDE.
3.2.1; 3.5.1; 3.6.1; 3.6.1.1; 3.6.1.2; 3.6.1.4; 3.7.1; 3.7.2; 3.7.3; 3.7.4; 3.7.5; 3.7.7; 3.7.8; 7.2.6; 10.2.1.1: 1-800 Notify does not store account data.
3.3.2; 3.4.1; 3.4.2: 1-800 Notify does not store sensitive authentication data (SAD) or PAN.
3.3.3: 1-800 Notify is not an issuer and does not support issuing services.
3.5.1.1: There were no hashes of PAN present within the environment.
3.5.1.2; 3.5.1.3: Disk-level or partition-level encryption was not utilized within the environment.
3.6.1.3; 3.7.6: Cleartext cryptographic key
components were not utilized within the environment.
3.7.9: Cryptographic keys are not shared with customers.
5.3.2.1: Periodic scans are not used; anti-malware software uses behavioural analysis.
5.3.3: Removable media is not in use.
6.3.2: The entity does not develop bespoke software for clients.
6.4.1: This requirement was superseded by 6.4.2
4.2.2: PAN was not transmitted over end-user messaging technologies.
5.2.3; 5.2.3.1: All in-scope system components were considered to be at risk for malware.
6.4.2; 6.4.3; 11.6.1: 1-800 Notify does not utilize any web interfaces.
6.5.2; 11.3.1.3; 11.3.2.1: No significant changes occurred during the assessment period.
8.2.2: Shared accounts were not present on any in- scope system component.
8.2.3: 1-800 Notify does not have access to customer premises.
8.2.7: 1-800 Notify does not allow third-party access into the CDE or in-scope environment.
8.3.9: All authentication into in-scope systems required MFA.
8.3.10: This requirement was superseded by 8.3.10.1.
8.3.10.1: No users had access to cardholder data within any of the in-scope applications.



	8.6.1 - 8.6.2: Interactive login was not possible or permitted within the in-scope environment.
	9.2.2: AWS does not make any network jacks within their service offering publicly available.
	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: 1-800 Notify does not utilize physical or electronic media for transmitting, storing, or processing cardholder data.
	9.5.1; 9.5.1.1; 9.5.1.2; 9.5.1.2.1; 9.5.1.3: 1-800 Notify does not utilize POI devices within the environment.
	10.4.2.1: Logs are reviewed daily through automated mechanisms.
	10.7.1: This requirement was superseded by 10.7.2.
	11.4.5-11.4.6: Segmentation was not used to reduce scope.
	11.4.7, A1: 1-800 Notify is not a multi-tenant service provider.
	12.3.2: No requirements were met with the customized approach.
	12.5.3: There have been no significant changes to the organizational structure during the review period.
	A2: 1-800 Notify does not utilize POS/POI terminals.
	A3: 1-800 Notify was not required to complete the Designated Entities Supplemental Validation (DESV).
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:	17 March 2025
Note: This is the first date that evidence was gathered, or observations were made.	
Date Assessment ended:	10 June 2025
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)

This AOC is based on results noted in the ROC dated 10 June 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):* 

Affected Requirement	requirement from being met	
	Details of how legal constraint prevents	
If selected, complete the following:		
This option requires additional review from the entity to which this AOC will be submitted.		
<b>Compliant but with Legal exception:</b> 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.		
	th a Non-Compliant status may be required to complete the Action Confirm with the entity to which this AOC will be submitted before	
Target Date for Compliance:		
<b>Non-Compliant:</b> 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 <b>NON-COMPLIANT</b> rating; thereby (Service Provider Company Name) has not demonstrated compliance with PCI DSS requirements.		
<b>Compliant:</b> 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 <b>COMPLIANT</b> rating; thereby <b>Always There Communications LLC, dba 1-800 Notify</b> has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above.		



# Part 3. PCI DSS Validation (continued)

#### Part 3a. Service Provider Acknowledgement

#### Signatory(s) confirms:

(Select all that apply)

$\bowtie$	The ROC was completed according to <i>PCI DSS</i> , Version 4.0.1 and was completed according to the instructions therein.
	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

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Signature of Service Provider Executive Officer $ earrow$	Date: 10 June 2025	
Service Provider Executive Officer Name: C. Martin Trautschold	Title: CEO	

#### 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.

Date: 10 June 2025



Signature of Lead QSA 🛧

Lead QSA Name: Angelique Naylor

Signature of Duly Authorized Officer of QSA Company ↑	Date: 10 June 2025	
Duly Authorized Officer Name: Petar Besalev, EVP Cybersecurity and Compliance Services	QSA Company: A-LIGN	



Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement		
If an ISA(s) was involved or assisted with this Assessment, indicate the role performed: Not Applicable.	☐ ISA(s) performed testing procedures.	
	<ul> <li>ISA(s) provided other assistance.</li> <li>If selected, describe all role(s) performed:</li> </ul>	



## 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			
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			

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/