



Payment Card Industry Data Security Standard

Attestation of Compliance for Report on Compliance – Merchants

Version 4.0

Revision 1

Publication Date: December 2022



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



Entity Name: Grammarly Inc.

Assessment End Date: 31 October 2024

Date of Report as noted in the Report on Compliance: 25 November 2024



Section 1 Assessment Information

Instructions for Submission

This Attestation of Compliance (AOC) must be completed as a declaration of the results of the merchant's assessment against the *Payment Card Industry Data Security Standard (PCI DSS) Requirements and Testing Procedures* ("Assessment"). Complete all sections. The merchant 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:	<i>Grammarly, Inc.</i>
DBA (doing business as):	<i>Grammarly</i>
Company mailing address:	<i>548 Market Street #35410, San Francisco, California 94104</i>
Company main website:	<i>https://www.grammarly.com/</i>
Company contact name:	<i>Alan Luk</i>
Company contact title:	<i>Head of GRC</i>
Contact phone number:	<i>+1 206-227-6569</i>
Contact e-mail address:	<i>alan.luk@grammarly.com</i>

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):	<i>N/A</i>
Qualified Security Assessor	
Company name:	<i>Protiviti</i>
Company mailing address:	<i>201 E Fifth St, Suite 700, Cincinnati, OH 45202, USA</i>
Company website:	<i>https://www.protiviti.com</i>
Lead Assessor name:	<i>Vinayak Ram</i>
Assessor phone number:	<i>+44 2073890496</i>
Assessor e-mail address:	<i>Vinayak.Ram@Protiviti.co.uk</i>



Assessor certificate number:

QSA 203-191

Part 2. Executive Summary

Part 2a. Merchant Business Payment Channels (select all that apply): (ROC Section 2.1)

Indicate all payment channels used by the business that are included in this Assessment.

☐ Mail order / telephone order (MOTO)

☒ E-Commerce

☐ Card-present

Are any payment channels not included in this Assessment?

☐ Yes ☒ No

If yes, indicate which channel(s) is not included in the Assessment and provide a brief explanation about why the channel was excluded.

Note: If the merchant has a payment channel that is not covered by this Assessment, consult with the entity(ies) to which this AOC will be submitted about validation for the other channels.

Part 2b. Description of Role with Payment Cards (ROC Section 2.1)

For each payment channel included in this Assessment as selected in Part 2a above, describe how the business stores, processes, and/or transmits account data.

Channel	How Business Stores, Processes, and/or Transmits Account Data
E-Commerce	<p>Storage: There is no storage of account data. All processing and transmission of account data are managed by PCI DSS-validated service providers (Gr4vy, Stripe, and Braintree).</p> <p>Process/Transmit: Grammarly does not process nor transmit any account data. The processing and transmission of account data are outsourced to PCI DSS-validated service providers (Gr4vy, Stripe, and Braintree).</p>

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.

Grammarly accepts payment card transactions via the e-commerce website Grammarly.com, and the e-commerce website supports two distinct plans: Grammarly standard subscription plan (Free and Pro) and Grammarly Enterprise plan. Grammarly utilizes Gr4vy, Braintree and Stripe as the payment processors for the e-commerce environment.

For payments processed by Gr4vy, account data is collected using the payment page from Gr4vy,



	<p><i>which is delivered as an iframe to the consumer browser. Gr4vy acts as a transaction orchestration layer or API gateway and routes payment requests to third-party payment processors (PayPal or Stripe) based on business requirements.</i></p> <p><i>For the payments processed by Braintree, account data is collected using the payment page from Braintree, which is delivered as an iframe to the customer's browser. The account data is securely transmitted from the customer's browser to Braintree. Alternatively, Braintree receives the payment request containing the account data from the API gateway (Gr4vy). Braintree is responsible for processing the account data and authorising the payment.</i></p> <p><i>For the payments processed by Stripe, account data is collected using Stripe's payment page, which is integrated with the Grammarly checkout page as a hosted payment page for the Enterprise plan and embedded in an iframe for the Standard subscription plan. Alternatively, Stripe receives the payment request containing the account data from the API gateway (Gr4vy). Stripe is responsible for processing the account data and authorising the payments they process.</i></p> <p><i>Account data is not stored within the in-scope environment and is outsourced to PCI DSS-validated service providers (Gr4vy, Stripe, and Braintree).</i></p>
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Indicate whether the environment includes segmentation to reduce the scope of the Assessment. Refer to "Segmentation" section of PCI DSS for guidance on segmentation.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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Part 2d. In-Scope Locations/Facilities (ROC Section 4.6)

List all types of physical locations/ facilities (for example, retail locations, 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)
AWS US-East region	1	US East



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
N/A	N/A	N/A	N/A	N/A

- 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 (PA-DSS), Point to Point Encryption (P2PE) solutions, Software-Based PIN Entry on COTS (SPoC) solutions, and Contactless Payments on COTS (CPoC) solutions).

♦ 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 (PA-DSS), 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)**

Does the entity have relationships with one or more third-party service providers that:	
<ul style="list-style-type: none"> 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) 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> Manage system components included in the scope of the Assessment (for example, via network security control services, anti-malware services, security incident and event management (SIEM), contact and call centers, web-hosting services, and IaaS, PaaS, SaaS, and FaaS cloud providers) 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> Could impact the security of the entity's CDE (for example, vendors providing support via remote access, and/or bespoke software developers). 	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

If Yes:

Name of Service Provider:	Description of Service(s) Provided:
<i>Gr4vy</i>	<i>Payment Service Provider</i>
<i>Stripe</i>	<i>Payment Service Provider</i>
<i>Braintree</i>	<i>Payment Service Provider</i>
<i>AWS</i>	<i>Hosting Provider for the Containers containing the payment page.</i>

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.

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	
	In Place	Not Applicable	Not Tested	Not In Place	Customized Approach	Compensating Controls
Requirement 1:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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"/>	<input type="checkbox"/>
Requirement 3:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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"/>	<input type="checkbox"/>
Requirement 5:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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"/>	<input type="checkbox"/>
Requirement 7:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input type="checkbox"/>
Requirement 9:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 10:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 11:	<input checked="" type="checkbox"/>	<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"/>	<input type="checkbox"/>
Appendix A2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3.2)

Date Assessment began: Note: This is the first date that evidence was gathered, or observations were made.		24 September 2024
Date Assessment ended: Note: This is the last date that evidence was gathered, or observations were made.		31 October 2024
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? If yes, for each testing activity below, indicate whether remote assessment activities were performed:		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
• Examine documentation	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
• Interview personnel	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
• Examine/observe live data	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
• Observe process being performed	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
• Observe physical environment	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
• Interactive testing	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
• Other:	<input type="checkbox"/> Yes <input checked="" 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 25 November 2024

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*):

<input checked="" type="checkbox"/>	<p>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 Grammarly, Inc. has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above.</p>				
<input type="checkbox"/>	<p>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 has not demonstrated compliance with PCI DSS requirements.</p> <p>Target Date for Compliance:</p> <p>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.</p>				
<input type="checkbox"/>	<p>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 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.</p> <p>This option requires additional review from the entity to which this AOC will be submitted.</p> <p><i>If selected, complete the following:</i></p> <table><thead><tr><th>Affected Requirement</th><th>Details of how legal constraint prevents requirement from being met</th></tr></thead><tbody><tr><td> </td><td> </td></tr></tbody></table>	Affected Requirement	Details of how legal constraint prevents requirement from being met		
Affected Requirement	Details of how legal constraint prevents requirement from being met				



Part 3a. Merchant 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 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. Merchant Attestation

DocuSigned by:

Alan Luk

3DF4509F148E4C0...

Signature of Merchant Executive Officer ↑	Date: 25 November 2024
Merchant Executive Officer Name: Alan Luk	Title: Head of GRC

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:

Signed by:

Vinayak Ram

66F439BA699A4E6...

Signature of Lead QSA ↑	Date: 25 November 2024
Lead QSA Name: Vinayak Ram	

DocuSigned by:

Chip Wolford

61BBEDA61C5F415...

Signature of Duly Authorized Officer of QSA Company ↑	Date: 25 November 2024
Duly Authorized Officer Name: Chip Wolford	QSA Company: Protiviti

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:

N/A

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"/>	
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 A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections	<input type="checkbox"/>	<input type="checkbox"/>	

