



Payment Card Industry (PCI) Data Security Standard

Attestation of Compliance for Onsite Assessments – Service Providers

Version 3.2.1

June 2018



Section 1: Assessment Information

Instructions for Submission

This Attestation of Compliance must be completed as a declaration of the results of the service provider's assessment with the *Payment Card Industry Data Security Standard Requirements and Security Assessment Procedures (PCI DSS)*. Complete all sections: The service provider is responsible for ensuring that each section is completed by the relevant parties, as applicable. Contact the requesting payment brand for reporting and submission procedures.

Part 1. Service Provider and Qualified Security Assessor Information

Part 1a. Service Provider Organization Information

| | | | |
|-------------------|--------------------------|--------------------------|----------------------------|
| Company Name: | Optimizely | DBA (doing business as): | |
| Contact Name: | Sahar Shayestehmehr | Title: | Compliance Program Manager |
| Telephone: | (800) 252-9480 | E-mail: | Sahar@optimizely.com |
| Business Address: | 631 Howard St. Suite 100 | City: | San Francisco |
| State/Province: | CA | Country: | USA |
| | | Zip: | 94105 |
| URL: | www.optimizely.com | | |

Part 1b. Qualified Security Assessor Company Information (if applicable)

| | | | |
|------------------------|-------------------------|----------|----------------------------|
| Company Name: | NCC Services Ltd. | | |
| Lead QSA Contact Name: | Mark Graziano | Title: | PCI QSA |
| Telephone: | 1-800-813-3523 | E-mail: | mark.graziano@nccgroup.com |
| Business Address: | 48 W 25th St. 4th Floor | City: | New York |
| State/Province: | NY | Country: | USA |
| | | Zip: | 10010 |
| URL: | www.nccgroup.trust/us | | |



Part 2. Executive Summary

Part 2a. Scope Verification

Services that were INCLUDED in the scope of the PCI DSS Assessment (check all that apply):

Name of service(s) assessed: The development and delivery infrastructure for Javascript snippets served to browsers for Optimizely X Web Experimentation, Web Personalization, and Web Recommendations.

Type of service(s) assessed:

Hosting Provider:

- Applications / software
- Hardware
- Infrastructure / Network
- Physical space (co-location)
- Storage
- Web
- Security services
- 3-D Secure Hosting Provider
- Shared Hosting Provider
- Other Hosting (specify):

Managed Services (specify):

- Systems security services
- IT support
- Physical security
- Terminal Management System
- Other services (specify):

Payment Processing:

- POS / card present
- Internet / e-commerce
- MOTO / Call Center
- ATM
- Other processing (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): Internet based delivery of JavaScript snippets for the Web Experimentation, Web Personalization, and Web Recommendations products on the Optimizely X platform

Note: These categories are provided for assistance only, and are not intended to limit or predetermine an entity's service description. If you feel these categories don't apply to your service, complete "Others." If you're unsure whether a category could apply to your service, consult with the applicable payment brand.



Part 2a. Scope Verification (continued)

Services that are provided by the service provider but were NOT INCLUDED in the scope of the PCI DSS Assessment (check all that apply):

Name of service(s) not assessed: Optimizely Classic, Optimizely X Full Stack, Optimizely X Over-The-Top

Type of service(s) not assessed:

| Hosting Provider: | Managed Services (specify): | Payment Processing: |
|--|--|--|
| <input type="checkbox"/> Applications / software <input type="checkbox"/> Hardware <input type="checkbox"/> Infrastructure / Network <input type="checkbox"/> Physical space (co-location) <input type="checkbox"/> Storage <input type="checkbox"/> Web <input type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input type="checkbox"/> Shared Hosting Provider <input type="checkbox"/> Other Hosting (specify): | <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): | <input type="checkbox"/> POS / card present <input type="checkbox"/> Internet / e-commerce <input type="checkbox"/> MOTO / Call Center <input type="checkbox"/> ATM <input type="checkbox"/> Other processing (specify): |
| <input type="checkbox"/> Account Management <input type="checkbox"/> Back-Office Services <input type="checkbox"/> Billing Management <input type="checkbox"/> Clearing and Settlement <input type="checkbox"/> Network Provider | <input type="checkbox"/> Fraud and Chargeback <input type="checkbox"/> Issuer Processing <input type="checkbox"/> Loyalty Programs <input type="checkbox"/> Merchant Services | <input type="checkbox"/> Payment Gateway/Switch <input type="checkbox"/> Prepaid Services <input type="checkbox"/> Records Management <input type="checkbox"/> Tax/Government Payments |

Others (specify): Any systems or services not related to development or delivery of JavaScript snippets for the Web products on the Optimizely X platform. This includes: - Internet delivery of JavaScript snippets for Optimizely Classic - Internet based delivery of client code delivered to Optimizely X Full Stack and Optimizely X Over-The-Top (OTT).

Provide a brief explanation why any checked services were not included in the assessment: Optimizely Classic is our legacy platform and separate from X. Optimizely X Full Stack and OTT do not affect clients' PCI compliance.

Part 2b. Description of Payment Card Business

| | |
|--|--|
| Describe how and in what capacity your business stores, processes, and/or transmits cardholder data. | Optimizely does not store, process, and/or transmit cardholder data. |
| Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data. | PCI Service Provider status can be applied to any entity that could affect the security of payment cards or transactions. Optimizely can be considered a Service Provider to its merchant customers that wish to use Optimizely products on those checkouts. |



Part 2c. Locations

List types of facilities (for example, retail outlets, corporate offices, data centers, call centers, etc.) and a summary of locations included in the PCI DSS review.

| Type of facility: | Number of facilities of this type | Location(s) of facility (city, country): |
|--------------------------------|-----------------------------------|--|
| <i>Example: Retail outlets</i> | 3 | <i>Boston, MA, USA</i> |
| Optimizely Headquarters | 1 | San Francisco, CA, USA |
| Hosting Providers | Numerous | Various |
| | | |
| | | |
| | | |

Part 2d. Payment Applications

Does the organization use one or more Payment Applications? Yes No

Provide the following information regarding the Payment Applications your organization uses:

| Payment Application Name | Version Number | Application Vendor | Is application PA-DSS Listed? | PA-DSS Listing Expiry date (if applicable) |
|--------------------------|----------------|--------------------|--|--|
| Not Applicable | Not Applicable | Not Applicable | <input type="checkbox"/> Yes <input type="checkbox"/> No | Not Applicable |
| | | | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| | | | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| | | | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| | | | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| | | | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| | | | <input type="checkbox"/> Yes <input type="checkbox"/> No | |

Part 2e. Description of 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 POS devices, databases, web servers, etc., and any other necessary payment components, as applicable.*

The software developed at Optimizely's Headquarters and deployed to the Optimizely X Platform using Akamai, Google Compute Cloud, Microsoft Azure, and Amazon Web Services.

Does your business use network segmentation to affect the scope of your PCI DSS environment?

(Refer to "Network Segmentation" section of PCI DSS for guidance on network segmentation)

Yes No



Part 2f. Third-Party Service Providers

Does your company have a relationship with a Qualified Integrator & Reseller (QIR) for the purpose of the services being validated?

Yes No

If Yes:

Name of QIR Company:

Not Applicable

QIR Individual Name:

Not Applicable

Description of services provided by QIR:

Not Applicable

Does your company have a relationship with one or more third-party service providers (for example, Qualified Integrator Resellers (QIR), gateways, payment processors, payment service providers (PSP), web-hosting companies, airline booking agents, loyalty program agents, etc.) for the purpose of the services being validated?

Yes No

If Yes:

| Name of service provider: | Description of services provided: |
|---------------------------|-----------------------------------|
| Akamai | PCI Compliant CDN, DNS |
| Amazon Web Services | Hosting Provider (Infrastructure) |
| Google Cloud Platform | Hosting Provider (Optimizely App) |
| Microsoft Azure | Hosting Provider (Infrastructure) |
| | |
| | |

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



Part 2g. Summary of Requirements Tested

For each PCI DSS Requirement, select one of the following:

- **Full** – The requirement and all sub-requirements of that requirement were assessed, and no sub-requirements were marked as “Not Tested” or “Not Applicable” in the ROC.
- **Partial** – One or more sub-requirements of that requirement were marked as “Not Tested” or “Not Applicable” in the ROC.
- **None** – All sub-requirements of that requirement were marked as “Not Tested” and/or “Not Applicable” in the ROC.

For all requirements identified as either “Partial” or “None,” provide details in the “Justification for Approach” column, including:

- Details of specific sub-requirements that were marked as either “Not Tested” and/or “Not Applicable” in the ROC
- Reason why sub-requirement(s) were not tested or not applicable

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: | | Optimizely X Web Experimentation, Web Personalization, and Web Recommendations. | | |
|---------------------------|----------------------------------|---|-------------------------------------|---|
| PCI DSS Requirement | Details of Requirements Assessed | | | Justification for Approach (Required for all “Partial” and “None” responses. Identify which sub-requirements were not tested and the reason.) |
| | Full | Partial | None | |
| Requirement 1: | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 1.3.6 - N/A - Optimizely does not store cardholder data. |
| Requirement 2: | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 2.1.1 - N/A - The cardholder data environments as administered by AWS, GCP, and Azure do not employ wireless technology. 2.2.3 - N/A - Optimizely does not employ insecure services, daemons, or protocols. 2.6 - N/A Optimizely is not a shared hosting provider. |
| Requirement 3: | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | 3 - N/A - Optimizely does not store, process, and/or transmit cardholder data. |
| Requirement 4: | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 4.1 - Partially N/A - Optimizely does not store, process, and/or transmit cardholder data. Optimizely utilizes strong cryptography to safeguard the integrity of snippets transmitted over the internet. 4.1.1 - N/A - Optimizely has no wireless networks transmitting cardholder data or connected to the cardholder data environment. 4.2 - N/A - No PANs used. 4.3 - N/A - Optimizely does not transmit cardholder data. |



| | | | | |
|-----------------|-------------------------------------|-------------------------------------|-------------------------------------|---|
| Requirement 5: | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Requirement 6: | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 6.4.3 - N/A - No PANs used. |
| Requirement 7: | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 7.3 - N/A - Optimizely does not store, process, and/or transmit cardholder data. |
| Requirement 8: | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | 8.1.5 - N/A - No vendor with access to inscope systems. 8.5.1 - N/A - Optimizely does not employ remote access to the customer's premises. 8.6 - N/A - No alternative authentication methods. 8.7 - N/A - Optimizely does not have a database that stores cardholder data. |
| Requirement 9: | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 9.4.1 - N/A - No cardholder data processing on Optimizely premises or systems. 9.5 - 9.8 - N/A - No media contains cardholder data. 9.9 - N/A - No physical devices that capture payment card data. |
| Requirement 10: | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 10.2.1 - N/A - No cardholder data in scope. |
| Requirement 11: | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| Requirement 12: | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | 12.3.9 - N/A - No remote partner access is permitted. 12.3.10 - N/A - Optimizely does not store or handle cardholder data. |
| Appendix A1: | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | A1.1-A1.4 - N/A - Optimizely is not a shared hosting provider. |
| Appendix A2: | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | A2.1 - N/A - No POS POI in scope. A2.2 - A2.3 - N/A - Optimizely is using TLS 1.1 and TLS 1.2 |



Section 2: Report on Compliance

This Attestation of Compliance reflects the results of an onsite assessment, which is documented in an accompanying Report on Compliance (ROC).

| | |
|--|---|
| The assessment documented in this attestation and in the ROC was completed on: | 04/26/2019 |
| Have compensating controls been used to meet any requirement in the ROC? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Were any requirements in the ROC identified as being not applicable (N/A)? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Were any requirements not tested? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Were any requirements in the ROC unable to be met due to a legal constraint? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |



Section 3: Validation and Attestation Details

Part 3. PCI DSS Validation

This AOC is based on results noted in the ROC dated 04/26/2019.

Based on the results documented in the ROC noted above, the signatories identified in Parts 3b-3d, as applicable, assert(s) the following compliance status for the entity identified in Part 2 of this document (**check one**):

| <input checked="" type="checkbox"/> | <p>Compliant: All sections of the PCI DSS ROC are complete, all questions answered affirmatively, resulting in an overall COMPLIANT rating; thereby Optimizely has demonstrated full compliance with the PCI DSS.</p> | | | | | | |
|-------------------------------------|---|----------------------|--|--|--|--|--|
| <input type="checkbox"/> | <p>Non-Compliant: Not all sections of the PCI DSS ROC are complete, or not all questions are answered affirmatively, resulting in an overall NON-COMPLIANT rating, thereby (<i>Service Provider Company Name</i>) has not demonstrated full compliance with the PCI DSS.</p> <p>Target Date for Compliance:</p> <p>An entity submitting this form with a status of Non-Compliant may be required to complete the Action Plan in Part 4 of this document. <i>Check with the payment brand(s) before completing Part 4.</i></p> | | | | | | |
| <input type="checkbox"/> | <p>Compliant but with Legal exception: One or more requirements are marked “Not in Place” due to a legal restriction that prevents the requirement from being met. This option requires additional review from acquirer or payment brand.</p> <p><i>If checked, complete the following:</i></p> <table border="1"> <thead> <tr> <th>Affected Requirement</th> <th>Details of how legal constraint prevents requirement being met</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table> | Affected Requirement | Details of how legal constraint prevents requirement being met | | | | |
| Affected Requirement | Details of how legal constraint prevents requirement being met | | | | | | |
| | | | | | | | |
| | | | | | | | |

Part 3a. Acknowledgement of Status

Signatory(s) confirms:

(**Check all that apply**)

| | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | The ROC was completed according to the <i>PCI DSS Requirements and Security Assessment Procedures</i> , Version 3.2.1, 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 my assessment in all material respects. |
| <input type="checkbox"/> | I have confirmed with my payment application vendor that my payment system does not store sensitive authentication data after authorization. |
| <input checked="" type="checkbox"/> | I have read the PCI DSS and I recognize that I must maintain PCI DSS compliance, as applicable to my environment, at all times. |
| <input checked="" type="checkbox"/> | If my environment changes, I recognize I must reassess my environment and implement any additional PCI DSS requirements that apply. |



Part 3a. Acknowledgement of Status (continued)

- | | |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | No evidence of full track data ¹ , CAV2, CVC2, CID, or CVV2 data ² , or PIN data ³ storage after transaction authorization was found on ANY system reviewed during this assessment. |
| <input checked="" type="checkbox"/> | ASV scans are being completed by the PCI SSC Approved Scanning Vendor Qualys |

Part 3b. Service Provider Attestation

DocuSigned by:

Bill Press

C4A79964E9B6409...

Signature of Service Provider Executive Officer ↑

Date: May-15-2019

Service Provider Executive Officer Name: Bill Press

Title: Senior Vice President, Eng

Part 3c. Qualified Security Assessor (QSA) Acknowledgement (if applicable)

If a QSA was involved or assisted with this assessment, describe the role performed:

A QSA assisted Optimizely with PCI DSS evidence collection and review for all applicable controls. Additionally, the QSA assisted Optimizely in the completion of the Self Assessment Questionnaire D (Service Provider) and the Attestation of Compliance.

DocuSigned by:

Mark Graziano

41219FE95CD4405...

Signature of Duly Authorized Officer of QSA Company ↑

Date: May-15-2019

Duly Authorized Officer Name: Mark Graziano

QSA Company: NCC Services Ltd

Part 3d. Internal Security Assessor (ISA) Involvement (if applicable)

If an ISA(s) was involved or assisted with this assessment, identify the ISA personnel and describe the role performed:

Not Applicable

¹ Data encoded in the magnetic stripe or equivalent data on a chip used for authorization during a card-present transaction. Entities may not retain full track data after transaction authorization. The only elements of track data that may be retained are primary account number (PAN), expiration date, and cardholder name.

² The three- or four-digit value printed by the signature panel or on the face of a payment card used to verify card-not-present transactions.

³ Personal identification number entered by cardholder during a card-present transaction, and/or encrypted PIN block present within the transaction message.



Part 4. Action Plan for Non-Compliant Requirements

Select the appropriate response for “Compliant to PCI DSS Requirements” for each requirement. If you answer “No” to any of the requirements, you may be required to provide the date your Company expects to be compliant with the requirement and a brief description of the actions being taken to meet the requirement.

Check with the applicable payment brand(s) before completing Part 4.

| 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 a firewall configuration to protect cardholder data | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 2 | Do not use vendor-supplied defaults for system passwords and other security parameters | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 3 | Protect stored cardholder data | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 4 | Encrypt transmission of cardholder data across open, public networks | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 5 | Protect all systems against malware and regularly update anti-virus software or programs | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 6 | Develop and maintain secure systems and applications | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 7 | Restrict access to cardholder data by business need to know | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 8 | Identify and authenticate access to system components | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 9 | Restrict physical access to cardholder data | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 10 | Track and monitor all access to network resources and cardholder data | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 11 | Regularly test security systems and processes | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 12 | Maintain a policy that addresses information security for all personnel | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| Appendix A1 | Additional PCI DSS Requirements for Shared Hosting Providers | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Not Applicable - Optimizely is not a shared hosting provider |
| Appendix A2 | Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Not Applicable - Optimizely does not use POS POI devices or SSL/Early TLS |

