



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: C-GLOBAL S.p.A.

Date of Report as noted in the Report on Compliance: 2025, November 15

Date Assessment Ended: 2025, November 15

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:	C-GLOBAL S.p.A
DBA (doing business as):	C-GLOBAL
Company mailing address:	Strada del Conventino 1, Collecchio (Pr), Italy
Company main website:	www.cglocal.it
Company contact name:	Gilberto Dalla Chiesa
Company contact title:	Process Support
Contact phone number:	+39 0521 01157
Contact e-mail address:	gilberto.dallachiesa@iongroup.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
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Qualified Security Assessor

Company name:	366 Security and Compliance (hereafter also 366 SECOM)
Company mailing address:	Via dell'Umiltà, 49 – 00187 Roma (Italy)
Company website:	www.366secom.com
Lead Assessor name:	Amedeo Lupinelli
Assessor phone number:	+39 393 9100090
Assessor e-mail address:	amedeo.lupinelli@366secom.com
Assessor certificate number:	202-901

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:	Welcome kit - GEBA - POS Open - GEPO - AUTOMA								
Type of service(s) assessed:									
<table border="1"> <tr> <td>Hosting Provider:</td> <td>Managed Services:</td> <td>Payment Processing:</td> </tr> <tr> <td> <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-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): <input type="checkbox"/> Account Management <input checked="" type="checkbox"/> Back-Office Services <input type="checkbox"/> Billing Management <input type="checkbox"/> Clearing and Settlement <input type="checkbox"/> Network Provider <input type="checkbox"/> Others (specify): </td> <td> <input type="checkbox"/> Systems security services <input type="checkbox"/> IT support <input type="checkbox"/> Physical security <input checked="" type="checkbox"/> Terminal Management System <input type="checkbox"/> Other services (specify): <input type="checkbox"/> Fraud and Chargeback <input type="checkbox"/> Issuer Processing <input type="checkbox"/> Loyalty Programs <input type="checkbox"/> Merchant Services </td> <td> <input checked="" type="checkbox"/> POI / card present <input type="checkbox"/> Internet / e-commerce <input type="checkbox"/> MOTO / Call Center <input checked="" type="checkbox"/> ATM <input type="checkbox"/> Other processing (specify): <input type="checkbox"/> Payment Gateway/Switch <input type="checkbox"/> Prepaid Services <input type="checkbox"/> Records Management <input type="checkbox"/> Tax/Government Payments </td> </tr> </table>				Hosting Provider:	Managed Services:	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-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): <input type="checkbox"/> Account Management <input checked="" type="checkbox"/> Back-Office Services <input type="checkbox"/> Billing Management <input type="checkbox"/> Clearing and Settlement <input type="checkbox"/> Network Provider <input type="checkbox"/> Others (specify): 	<input type="checkbox"/> Systems security services <input type="checkbox"/> IT support <input type="checkbox"/> Physical security <input checked="" type="checkbox"/> Terminal Management System <input type="checkbox"/> Other services (specify): <input type="checkbox"/> Fraud and Chargeback <input type="checkbox"/> Issuer Processing <input type="checkbox"/> Loyalty Programs <input type="checkbox"/> Merchant Services 	<input checked="" type="checkbox"/> POI / card present <input type="checkbox"/> Internet / e-commerce <input type="checkbox"/> MOTO / Call Center <input checked="" type="checkbox"/> ATM <input type="checkbox"/> Other processing (specify): <input type="checkbox"/> Payment Gateway/Switch <input type="checkbox"/> Prepaid Services <input type="checkbox"/> Records Management <input type="checkbox"/> Tax/Government Payments
Hosting Provider:	Managed Services:	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-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): <input type="checkbox"/> Account Management <input checked="" type="checkbox"/> Back-Office Services <input type="checkbox"/> Billing Management <input type="checkbox"/> Clearing and Settlement <input type="checkbox"/> Network Provider <input type="checkbox"/> Others (specify): 	<input type="checkbox"/> Systems security services <input type="checkbox"/> IT support <input type="checkbox"/> Physical security <input checked="" type="checkbox"/> Terminal Management System <input type="checkbox"/> Other services (specify): <input type="checkbox"/> Fraud and Chargeback <input type="checkbox"/> Issuer Processing <input type="checkbox"/> Loyalty Programs <input type="checkbox"/> Merchant Services 	<input checked="" type="checkbox"/> POI / card present <input type="checkbox"/> Internet / e-commerce <input type="checkbox"/> MOTO / Call Center <input checked="" type="checkbox"/> ATM <input type="checkbox"/> Other processing (specify): <input type="checkbox"/> Payment Gateway/Switch <input type="checkbox"/> Prepaid Services <input type="checkbox"/> Records Management <input type="checkbox"/> Tax/Government Payments							
<p>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.</p>									

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:	All the services audited in CEDACRI ROC and CEDACRI INTERNATIONAL ROC	
Type of service(s) not assessed:		
Hosting Provider: <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-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): _____	Managed Services: <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): _____	Payment Processing: <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): _____
<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): _____		
Provide a brief explanation why any checked services were not included in the Assessment:	The services provided by Cedacri were not assessed in this report as those had been already assessed in Cedacri ROC dated 2025 November 15 and all the services assessed into CEDACRI INTERNATIONAL ROC dated 2025 November 15. CEDACRI and CEDACRI INTERNATIONAL are Service Providers Level 1 PCI DSS v 4.0.1 compliant.	

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.	C-Global operates as a specialized service provider, delivering a comprehensive suite of outsourced solutions to the financial sector. While historically part of the CEDACRI Group, the company was acquired by the ION Group in 2024.
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	<p>Despite this change in ownership, C-Global remains steadfast in its core mission: to provide secure, reliable, and high-quality services to financial institutions, ensuring business continuity and operational excellence. The company continues to perform all its established activities without interruption.</p> <p>C-Global's service portfolio is designed to support financial institutions across multiple critical domains:</p> <ul style="list-style-type: none"> Back-Office Operations: Streamlining and managing essential back-office processes to enhance efficiency and reduce operational costs for clients. Payment Terminal Fleet Management: End-to-end management and provisioning of ATM and POS fleets, including logistics, maintenance, and monitoring. Customer Interaction: Operating a dedicated Contact Center to handle customer inquiries, support, and service requests. Acquiring Services: Specialized POS terminal handling and management for the CartaSi acquirer network. Security & Fraud Prevention: Providing robust fraud management services, card blocking, and 3D Secure code reset functions on behalf of the Helpline service provider. <p>All operations are supported by the technology platform fully owned and managed by CEDACRI S.p.A.</p> <p>CEDACRI S.p.A. infrastructure is certified against the Payment Card Industry Data Security Standard (PCI DSS) version 4.0.1</p>
<p>Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.</p>	<p>C-Global Personnel never have access to real PAN as these information are tokenized or masqued by CEDACRI S.p.A, Service Provider PCI DSS 4.0.1 certified, Tokenization system developed by TAS Group. C-Global does not manage any payment channels directly.</p> <p>The main services managed by C-GLOBAL are:</p> <ul style="list-style-type: none"> Welcome kit: The "Welcome Kit" service operated by C-Global is a secure, instruction-based distribution process for personalized payment cards. The procedure begins when C-Global receives a specific dispatch instruction from a client bank, which contains the shipping address for a designated end-user. Following this instruction, C-Global personnel execute the critical step of matching the bank's request to the corresponding pre-sealed envelope containing the personalized card, thereby ensuring the correct kit is associated with the intended recipient. Finally, C-Global arranges for the shipment of the sealed envelope exclusively to the address provided by the client bank, acting solely on the bank's logistical directives to complete the secure delivery. ATM Management: C-Global provides monitoring and first-level helpdesk support exclusively

	<p>for ATM terminals on behalf of its Customer Banks. This service is strictly technical and is delivered without any visibility of cardholder data, such as full PANs or transaction details. The support team utilizes specific dedicated applications - namely GEBA by TAS Group, ATM Manager, and Automa - which are designed solely for diagnosing and resolving technical issues related to terminal functionality, connectivity, and hardware status. Crucially, none of these applications display or store full card numbers or sensitive transaction information to the operators; their exclusive purpose is to facilitate the resolution of technical malfunctions and ensure terminal uptime.</p> <ul style="list-style-type: none"> • POS Management: C-Global provides comprehensive POS management services for the Merchants of its Client Banks, encompassing installation, maintenance, and device initialization. These field operations are executed through two primary outsourcing partners, CSC Italia and INGENICO. The entire workflow, from request to resolution, is managed using the Remedy ticketing system, which is currently slated for replacement by the new Helix platform. For the technical management and remote support of these POS terminals, C-Global utilizes dedicated applications, specifically POS Open and GEPO. It is critical to note that these platforms are used exclusively for technical configuration, diagnostics, and operational troubleshooting. They do not display, process, or store sensitive cardholder data, as their sole purpose is to ensure the proper functionality and availability of the payment terminals. • Fraud Prevention: C-Global provides fraud prevention services for payment instruments issued by NEXI, which are delivered through its specialized subsidiary, CEDACRI International. The service operates as a dedicated customer assistance function for NEXI, focusing on outbound calls to cardholders to verify potentially fraudulent transactions in real-time or near-real-time. This critical activity is performed exclusively through NEXI's own proprietary platform, which is certified as PCI DSS compliant as a Service Provider.
Describe system components that could impact the security of account data.	Client, people and processes

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 POS devices, databases, web servers, etc., and any other necessary payment components, as applicable.*
- *System components that could impact the security of account data.*

C-Global's security posture and PCI DSS compliance framework are fundamentally strengthened by the robust technological segmentation implemented by its service provider, CEDACRI, which is certified against PCI DSS version 4.0.1.

C-Global benefits from a multi-layered segmentation strategy that significantly reduces the scope of its cardholder data environment (CDE). This is not limited to network segmentation alone but extends to a comprehensive set of logical and physical controls:

- **Logical Access Control:** Access to in-scope systems is strictly limited to authorized personnel through logically defined roles and profiles. This is further enforced by RACF (Resource Access Control Facility) from IBM, providing mainframe-level security governance.
- **Structured Identity & Access Management (IAM):** A formal and organized Identity Management process is in place, ensuring that user access rights are provisioned, managed, and revoked in a controlled and auditable manner throughout the employee lifecycle.
- **Physical Segregation:** The office area dedicated to the Welcome Kit service is physically segregated from other operational zones. Access to this sensitive area is controlled by specific security measures, including:
 - **Badge & PIN systems** for authorized personnel.
 - **Video Surveillance (TVCC/CCTV)** to monitor and manage access points and internal activities continuously.

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)
<i>Example: Data centers</i>	3	<i>Boston, MA, USA</i>
Offices	2	Collecchio (Parma) - ITALY Castellazzo Bormida (Alessandria) - ITALY
Operation office	1	Collecchio (Parma) - ITALY

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
				YYYY-MM-DD

* 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 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"> 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 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) 	<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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No

If Yes:

Name of Service Provider:	Description of Services Provided:
DOCUGEST	The Welcome Kit service handles only inactive, non-live PANs and impacts account data security solely through the physical integrity of its secure distribution process.
CEDACRI S.p.A.	CEDACRI S.p.A. operates as the primary PCI DSS-certified service provider for C-GLOBAL, managing all cardholder data environments and tokenization systems on its behalf.
CEDACRI INTERNATIONAL	C-Global has partially outsourced its customer care and fraud prevention functions to CEDACRI International, a specialized subsidiary operating under certified PCI DSS compliance frameworks.

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: Welcome kit - GEBA - POS Open - GEPO - AUTOMA

PCI DSS Requirement	Requirement Finding More than one response may be selected for a given requirement. Indicate all responses that apply.				Select If a Compensating Control(s) Was Used
	In Place	Not Applicable	Not Tested	Not in Place	
Requirement 1:	<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"/>
Requirement 3:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 4:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 5:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 6:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 7:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 8:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 9:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 10:	<input checked="" type="checkbox"/>	<input 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 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"/>

Justification for Approach

For any Not Applicable responses, identify which sub-requirements were not applicable and the reason.	2.3.1 - No Wireless network connected to CDE 2.3.2 - No Wireless network connected to the CDE 4.2.2 - C-GLOBAL personnel cannot send the real PAN as they have no access to it. This is both a technical and policy enforcement. 4.2.1.2 - wireless networks were isolated from the CDE and did not handle PAN 6 (all Requirements) C-GLOBAL never develops software for PCI DSS environment, but it used commercial applications running on technological environment supplied and completely managed by CEDACRI. APPENDIX A1 - C-GLOBAL is not a multi-tenant service providers APPENDIX A2 - C_GLOBAL does not use SSL/Early TLS for Card-Present POS POI Terminal Connections
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>	2025, July 15
Date Assessment ended: <i>Note: This is the last date that evidence was gathered, or observations were made.</i>	2025, November 15
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 2025-11-15).

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 C-GLOBAL 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 (Service Provider Company Name) has not demonstrated compliance with PCI DSS requirements.</p> <p>Target Date for Compliance: YYYY-MM-DD</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 (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.</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 border="1" data-bbox="290 1501 1400 1733"> <thead> <tr> <th data-bbox="290 1501 633 1564">Affected Requirement</th><th data-bbox="633 1501 1400 1564">Details of how legal constraint prevents requirement from being met</th></tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <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 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

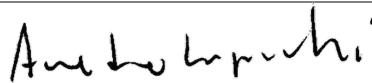


Signature of Service Provider Executive Officer ↑	Date: 2025-11-15
Service Provider Executive Officer Name: Lucio Guttilla	Title: C-GLOBAL President

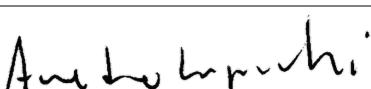
Part 3c. Qualified Security Assessor (QSA) Acknowledgement

If a QSA was involved or assisted with this Assessment, indicate the role performed:	<input checked="" type="checkbox"/> QSA performed testing procedures.
	<input type="checkbox"/> QSA provided other assistance.

If selected, describe all role(s) performed:



Signature of Lead QSA ↑	Date: 2025-11-15
Lead QSA Name: Amedeo Lupinelli	



Signature of Duly Authorized Officer of QSA Company ↑	Date: 2025-11-15
Duly Authorized Officer Name: Amedeo Lupinelli	QSA Company: 366 Security and Compliance

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

If an ISA(s) was involved or assisted with this Assessment, indicate the role performed:	<input type="checkbox"/> ISA(s) performed testing procedures.
	<input type="checkbox"/> ISA(s) provided other assistance.

If selected, describe 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	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 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/