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: Parlevel Systems

Date of Report as noted in the Report on Compliance: 07-Feb-2025

Date Assessment Ended: 31-Jan-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:	Parlevel Systems
DBA (doing business as):	365 Retail Markets LLC
Company mailing address:	1743 Maplelawn Rd. Troy MI 48084
Company main website:	www.parlevelsystems.com
Company contact name:	Syed Umair Azim
Company contact title:	Compliance Officer
Contact phone number:	888.365.6282
Contact e-mail address:	syed.azim@365smartshop.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):	
Qualified Security Assessor	
Company name:	Certify Audit Services Inc.
Company mailing address:	PO BOX 83752 Gaithersburg MD 20883
Company website:	www.certifyauditservices.com
Lead Assessor name:	Carlette (Letty) Gambrell
Assessor phone number:	775.622.5386
Assessor e-mail address:	letty@certifyauditservices.com
Assessor certificate number:	206-171

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:	MicroMarket, Vending, & Food Service Technology	
Type of service(s) assessed:		
Hosting Provider: □ Applications / software □ Hardware □ Infrastructure / Network □ Physical space (co-location) □ Storage □ Web-hosting services □ Security services □ 3-D Secure Hosting Provider □ Multi-Tenant Service Provider □ Other Hosting (specify):	**Managed Services:** □ Systems security services □ IT support □ Physical security □ Terminal Management System □ Other services (specify):	**Payment Processing:** ☒ POI / card present ☒ Internet / e-commerce □ MOTO / Call Center □ ATM □ Other processing (specify):
□ 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): Self-Service Stand Alone Kiosk, Attended and unattended food service terminals and vending machines		

Note: *These categories are provided for assistance only and are not intended to limit or predetermine an entity's service description. If these categories do not apply to the assessed service, complete "Others." If it is not clear whether a category could apply to the assessed service, consult with the entity(ies) to which this AOC will be submitted.*

Part 2. Executive Summary *(continued)*

Part 2a. Scope Verification *(continued)*

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

Name of service(s) not assessed:	

Type of service(s) not assessed:

Hosting Provider:

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

Managed Services:

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

Payment Processing:

□ POI / card present
□ Internet / e-commerce
□ MOTO / Call Center
□ ATM
□ Other processing (specify):

□ 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):

Provide a brief explanation why any checked services were not included in the 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.	Parlevel provides unattended retail technology to food and beverage operators. These solutions are mainly a cloud based software and self-attended kiosks (points of sale). Both of these inter-operate with payment solutions, since consumers pay at vending machines that Parlevel is monitoring or at kiosks in which Parlevel is the point of sale software. The following are explanations on the three different ways in which payment solutions inter-operate with Parlevel, and the very limited role Parlevel plays in each. At vending machines, smart coolers, and Parlevel kiosks fitted with a semi-integrated payment solution,

	the operator places a card reader in contact with such machine for customers to complete card present payments using swipe, chip insert or through Near-field Communication Contactless Payment (NFC). Full track or EVM data is encrypted upon contact utilizing a secure E2EE (End-to-End Encrypted) direct real-time connection to the card processor. All data is encrypted by the card reader upon contact and such solution connects via a direct mobile data or internet connection to its gateway. Parlevel does not have access to the encryption keys, cannot decrypt this encrypted cardholder data, and is not in the flow of information, which happens directly between the reader and its gateway. This dramatically reduces the scope as Parlevel does not store, process and/or transmit anything. Some Parlevel kiosks utilize a secure E2EE (End-to-End Encrypted) direct real-time connection to the card processor when items are checked out. The customer will complete card present payment through swipe or through Near-field Communication Contactless Payment (NFC), with no cardholder data stored for later use. Transactions are needed to complete purchase of items from the self-service, stand-alone, kiosks and mini-retail shops where Parlevel provide their services. All data is encrypted by the card reader upon contact, Parlevel does not have access to the encryption keys and cannot decrypt this encrypted cardholder data. This dramatically reduces the scope as Parlevel does not store, processes and/or transmit (PAN data encrypted during transmission, but Parlevel does not have access to keys – hence not in scope). Parlevel's mobile app is an e-commerce application that utilizes Stripe PCI DSS certified backend solution for e-commerce transactions. It uses Stripe's drop-in code for card data to be entered, cards to be stored on file at Stripe and where Parlevel uses tokens to charge such cards on file when customer transacts. Parlevel stays out of scope given it never receives, stores, transmits, or uses cardholder data.
Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.	Entity is not exposed to clear-text CHD. All CHD is collected by the POI device deployed within the kiosk and encrypted by the POI device. This information is sent directly to the processor for payment processing. Upon completion of processing the truncated PAN is provided to the Parlevel backend environment along with results of the transaction request.
Describe system components that could impact the security of account data.	Kiosks and servers supporting the solution.

Part 2. Executive Summary *(continued)*

Part 2c. Description of Payment Card Environment

Provide a high-level description of the environment covered by this Assessment. *For example:* • *Connections into and out of the cardholder data environment (CDE).* • *Critical system components within the CDE, such as POI devices, databases, web servers, etc., and any other necessary payment components, as applicable.* • *System components that could impact the security of account data.*	Assessment reviewed the overalll environment to include the network deployed at the co-location facility, access by entity to the facility from the office locations, and connectivity to and from supported processors. In addition, the development and management of systems and the internal applications were reviewed.

Indicate whether the environment includes segmentation to reduce the scope of the Assessment. (Refer to the "Segmentation" section of PCI DSS for guidance on segmentation)	☒ Yes ☐ No

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)
Example: Data centers	*3*	*Boston, MA, USA*
Headquarters	1	Troy MI USA
Data Center	1	Google GCP USA

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
UPT1000F		PCI PTS 5.x	4-80031	30-Apr-2026
UPT1000F		PCI PTS 5.x	4-80051	30-Apr-2026

* 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:

• 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:
BrainTree	Processor
Cantaloupe	Processor
Heartland Payment Systems	Processor
Google GCP	Cloud Provider

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: MicroMarket, Vending, & Food Service Technology

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:	☒	☒	☐	☐	☐
Requirement 2:	☒	☒	☐	☐	☐
Requirement 3:	☒	☒	☐	☐	☐
Requirement 4:	☒	☒	☐	☐	☐
Requirement 5:	☒	☐	☐	☐	☐
Requirement 6:	☒	☒	☐	☐	☐
Requirement 7:	☒	☐	☐	☐	☐
Requirement 8:	☒	☒	☐	☐	☐
Requirement 9:	☒	☒	☐	☐	☐
Requirement 10:	☒	☐	☐	☐	☐
Requirement 11:	☒	☒	☐	☐	☐
Requirement 12:	☒	☒	☐	☐	☐
Appendix A1:	☐	☒	☐	☐	☐
Appendix A2:	☐	☒	☐	☐	☐

Justification for Approach

For any Not Applicable responses, identify which sub-requirements were not applicable and the reason.	1.2.6 & 2.2.5 - No insecure service 1.4.5 - No exposure of internal IP addresses 3.3.3 - Entity not an issuer 3.4.2 & 3.5 - 3.7.9 - Entity does not store CHD. 4.2.1.2 - Wireless not used to transmit CHD 4.2.2 - End-user messaging not used to transmit CHD 6.4.3 & 11.6.1 - Does not support use of payment pages 8.2.3 - Does not have remote access to customer premises 9.4.6 - No hardcopy of CHD 9.5 - 9.5.1.3 - Entity does not maintain POI devices 11.4.5 - 11.4.6 - Segmentation not used 11.4.7 & Appendix A1 - Not a multi-tenant service provide 12.3.2 - Customized approach not utilized Appendix A2 - Early TLS/SSL not utilized
For any Not Tested responses, identify which sub-requirements were not tested and the reason.	N/A

Section 2 Report on Compliance

(**ROC Sections 1.2 and 1.3**)

Date Assessment began: ***Note:*** *This is the first date that evidence was gathered, or observations were made.*	01-Dec-2024
Date Assessment ended: ***Note:*** *This is the last date that evidence was gathered, or observations were made.*	31-Jan-2025
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 *(Date of Report as noted in the ROC 07-Feb-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)**:***

☒ **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 Parlevel Systems has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above.

☐ **Non-Compliant:** Not all sections of the PCI DSS ROC are complete, or one or more requirements are marked as Not in Place, resulting in an overall **NON-COMPLIANT** rating; thereby *(Service Provider Company Name)* has not demonstrated compliance with PCI DSS requirements.

Target Date for Compliance: *YYYY-MM-DD*

An entity submitting this form with a Non-Compliant status may be required to complete the Action Plan in Part 4 of this document. Confirm with the entity to which this AOC will be submitted before completing Part 4.

☐ **Compliant but with Legal exception:** One or more assessed requirements in the ROC are 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.

This option requires additional review from the entity to which this AOC will be submitted.

If selected, complete the following:

Affected Requirement	Details of how legal constraint prevents requirement from being met

Part 3. PCI DSS Validation *(continued)*

Part 3a. Service Provider Acknowledgement

Signatory(s) confirms:
(Select all that apply)

☒	The ROC was completed according to *PCI DSS*, 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.
☒	PCI DSS controls will be maintained at all times, as applicable to the entity's environment.

Part 3b. Service Provider Attestation

M. Benjamin Hayden

Signature of Service Provider Executive Officer ↑	Date: 07-Feb-2025
Service Provider Executive Officer Name:	Title: Director of IT & Security

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:

Carlette Gambrell

Signature of Lead QSA ↑	Date: 07-Feb-2025
Lead QSA Name: Carlette (Letty) Gambrell	

Barry Johnson

Signature of Duly Authorized Officer of QSA Company ↑	Date: 07-Feb-2025
Duly Authorized Officer Name: Barry Johnson	QSA Company: Certify Audit Services Inc.

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:

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	☒	☐	
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/