

Payment Card Industry Data Security Standard



Attestation of Compliance for Report on Compliance – Service Providers

Version 4.0

Revision 2

Publication Date: August 2023



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

Entity Name: Tripode Partners Group S.L.

Assessment End Date: 27 September 2024

Date of Report as noted in the Report on Compliance: 27 September 2024



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 Informatio	on .
Part 1a. Assessed Entity (ROC Section 1.1)	
Company name:	Tripode Partners Group S.L.
DBA (doing business as):	Dingus Spain S.L
Company mailing address:	C/ Galileo Galilei 2, Edf U, Local 01, 07121 Parc Bit, Illes Balears, Spain
Company main website:	https://www.dingus.es/
Company contact name:	Óscar Sánchez
Company contact title:	Responsable seguridad
Contact phone number:	+34 682 609 244
Contact e-mail address:	oscar.sanchez@dingus.es
Part 1h Assessor	

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):	N/A			
Qualified Security Assessor				
Company name:	A2 Secure Technologias Informatica, Sociedad Ltd.			
Company mailing address:	Av. de Francesc Cambó, 21, 10a. 08003 Barcelona (Spain)			
Company website:	https://www.a2secure.com/			
Lead Assessor name:	Guillem Cuesta			
Assessor phone number:	933 94 56 00			
Assessor e-mail address:	guillem.cuesta@a2secure.com			
Assessor certificate number:	205-308			



Part 2. Executive Summary					
Part 2a. Scope Verification					
Services that were <u>INCLUDED</u> in the	scope of the Assessment (select all	that apply):			
Name of service(s) assessed:	Book&Payment				
Type of service(s) assessed:					
Hosting Provider: Applications / software Hardware Infrastructure / Network Physical space (co-location)	Managed Services: ☐ Systems security services ☐ IT support ☐ Physical security ☐ Terminal Management System	Payment Processing: ☐ POI / card present ☐ Internet / e-commerce ☐ MOTO / Call Center ☐ ATM			
☐ Storage ☐ Web-hosting services ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Multi-Tenant Service Provider ☐ Other Hosting (specify):	Other services (specify):	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): CRS-Central Reservation System					
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: All Tripode Partners Group S.L. services not specifically listed above Type of service(s) not assessed: **Hosting Provider: Managed Services: Payment Processing:** ☐ Applications / software ☐ Systems security services ☐ POI / card present ☐ Hardware ☐ IT support ☐ Internet / e-commerce ☐ MOTO / Call Center ☐ Infrastructure / Network ☐ Physical security ☐ Physical space (co-location) ☐ Terminal Management System \square ATM ☐ Storage Other services (specify): ☐ Other processing (specify): ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Other Hosting (specify): ☐ Fraud and Chargeback ☐ Payment Gateway/Switch ☐ Account Management ☐ Back-Office Services ☐ Issuer Processing ☐ Prepaid Services ☐ Billing Management ☐ Loyalty Programs ☐ Records Management ☐ Tax/Government Payments ☐ Clearing and Settlement ☐ Merchant Services □ 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 Section 2.1) Describe how the business stores, processes, and/or Dingus is a company with software products such as transmits account data. hotel distribution software, which helps hotels manage and distribute their bookings across multiple online channels. Its goal is to simplify reservation management, optimize occupancy, and maximize revenue by integrating booking systems, distribution channels, and other related services. Describe how the business is otherwise involved in or Book&Payment environments does not store CHD. has the ability to impact the security of its customers' However, some data (PAN and CVV) is received and account data. processed by the solution.



Describe system components that could impact the security of account data.

Dingus manages the PCI environment deployed on AWS, which includes both public and private subnets. The following services and functions impact the security of account data:

Public Subnet:

- <u>Elastic Load Balancer (ELB):</u> The ELB is responsible for distributing incoming traffic across multiple instances, which helps in balancing the load and preventing any single point of failure. Its configuration and security settings are critical for ensuring secure and reliable access to the environment.
- <u>Bastion Host:</u> The Bastion host provides sysadmin access through SSH to manage and monitor the instances in the private subnet. Its security is essential to prevent unauthorized access and ensure that sysadmin operations are conducted securely.

Private Subnet:

- <u>API Servers</u>: These servers handle application processing and communication within the private network. Their security is crucial as they interact with sensitive data and contribute to the overall protection of account data.
- Main Database (MongoDB): The MongoDB instance stores data, including any tokens or transaction information. Proper configuration, access controls, and encryption of the database are essential to protect stored data.
- <u>Wazuh:</u> This security monitoring service provides intrusion detection and log analysis, which helps in identifying and responding to potential security threats. Effective use of Wazuh is key to maintaining the security of account data by detecting and mitigating risks.

Access Controls:

 Two-Factor Authentication (2FA): Access to the environment is secured through 2FA, which adds an additional layer of security by requiring two forms of verification before access is granted. This helps in preventing unauthorized access to the PCI environment and ensures that only authorized personnel can access sensitive components.

Overall, the managed services and functions provided by the organization are designed to enhance the security of account data by implementing robust access controls,



balancing loads, securing database interactions, and monitoring for potential threats.



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.

All PCI environment has been deployed on AWS (Amazon Web Services) by Dingus.

The PCI environment includes 2 VPC (Public Subnet & Private Subnet) where all required instances are allocated.

While on the public subnet Dingus has allocated the ELB and the BASTION (sysadmin access through SSH), the API servers, the main DB (Mongo DB), Wazuh and other management services has been deployed on the private network.

The access to the environment is performed through a 2FA.

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)	
Example: Data centers	3	Boston, MA, USA	
Dingus headquarters	1	Palma Mallorca, Spain	
AWS environment	1	eu-west-1 Europe (Ireland)	



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 (PADSS), 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)

For the services being validated, does the entity have relationships with one or more third-party service providers that:

•	Store, process, or transmit account data on the entity's behalf (for example, payment gateways, payment processors, payment service providers (PSPs, and off-site storage))	⊠ Yes □ No
•	Manage system components included in the entity's Assessment (for example, via network security control services, anti-malware services, security incident and event management (SIEM), contact and call centers, web-hosting companies, and IaaS, PaaS, SaaS, and FaaS cloud providers)	⊠ Yes □ No
•	Could impact the security of the entity's CDE (for example, vendors providing support via remote access, and/or bespoke software developers).	⊠ Yes □ No

If Yes:

Name of Service Provider:	Description of Services Provided:	
Amazon WebServices (AWS)	On-demand cloud computing platform	
Addon Payments	Payment processing	
PAYCOMMET	Payment processing	
PayNoPain	Payment processing	
Redsys	Payment processing	
UniversalPay	Payment processing	
Banca March through Redsys	Payment processing	
Abreu Online	OTA (Online travel Agency)	
Agoda	OTA (Online travel Agency)	
ATRAPALO	OTA (Online travel Agency)	
BOOKING	Travel fare aggregator	
CHECK24	OTA (Online travel Agency)	
CTRIP	OTA (Online travel Agency)	
DESPEGAR	OTA (Online travel Agency)	
EDREAMS	OTA (Online travel Agency)	
EXPEDIA	Travel fare aggregator	
FASTPAY	OTA (Online travel Agency)	
GNA Hotel Solutions	OTA (Online travel Agency)	
HBSI	OTA (Online travel Agency)	
HOTELBEDS	OTA (Online travel Agency)	



Hotetec	OTA (Online travel Agency)
Hotusa	OTA (Online travel Agency)
IGM WEB	OTA (Online travel Agency)
Lastminute	OTA (Online travel Agency)
LIBGO TRAVEL/FLIGHT CENTRE	OTA (Online travel Agency)
Mirai	OTA (Online travel Agency)
Neobookings	OTA (Online travel Agency)
PARATY	OTA (Online travel Agency)
ROIBACK	OTA (Online travel Agency)
SEE USA TOURS	OTA (Online travel Agency)
TRAFFICS/CONNECTED DESTINATIONS	OTA (Online travel Agency)
TRAVELREPUBLIC/DNATA	OTA (Online travel Agency)
W2M/NT INCOMING	OTA (Online travel Agency)
Welcomebeds	OTA (Online travel Agency)

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: Book&Payment

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	
quo	In Place	Not Applicable	Not Tested	Not in Place	Customized Approach	Compensating Controls
Requirement 1:	\boxtimes	\boxtimes				
Requirement 2:	\boxtimes	\boxtimes				
Requirement 3:	\boxtimes	\boxtimes				
Requirement 4:	\boxtimes	\boxtimes				
Requirement 5:	\boxtimes					
Requirement 6:	\boxtimes					
Requirement 7:	\boxtimes					
Requirement 8:						
Requirement 9:	\boxtimes	\boxtimes				
Requirement 10:	\boxtimes	\boxtimes				
Requirement 11:	\boxtimes					
Requirement 12:						
Appendix A1:						
Appendix A2:						
Justification for Approach						



For any Not Applicable responses, identify which subrequirements were not applicable and the reason.

- **1.2.6, 2.2.5.b** It was verified that the organization does not allow the usage of insecure services, daemons, or protocols in the CDE.
- **1.3.3** It was verified that the organization does not transmit cardholder data over wireless networks, nor does it use these networks in any way that could impact the security of the CDE
- 1.4.4, 3.4.1 through 3.7.9 The organization does not store cardholder data
- **2.3.1** The organization does not transmit cardholder data over wireless networks, nor does it use these networks in any way that could impact the security of the CDE
- 3.3.3 The organization does not support issuing services
- **4.2.1** Considered Security Best practice until 31 March 2025
- **4.2.2** PANs are not allowed to be sent through enduser messaging technologies.
- **5.2.3.1, 5.3.2.1** Considered Security Best practice until 31 March 2025
- **6.3.2, 6.4.3** Considered Security Best practice until 31 March 2025
- **7.2.4.b, 7.2.5.b, 7.2.5.1, 7.2.6.b** Considered Security Best practice until 31 March 2025
- 8.2.4 There have been no new additions
- 8.2.5.a There have been no terminations
- **8.2.5.b, 8.3.11** The organization does not use physical authentication factors
- **8.3.10.1**, **8.5.1**, **8.6.1**, **8.6.2.b**, **8.6.3** Considered Security Best practice until 31 March 2025
- **9.4.1 through 9.5.1** The organization's PCI environment does not include external storage media such as backups or tapes that can be transported, classified, etc. All scope is located in AWS.

10.7.2, 10.7.3, 11.3.1.1, 11.3.1.2, 11.4.7, 11.5.1.1, 11.6.1, 12.3.1, 12.3.3, 12.5.2.1, 12.5.3, 12.6.2, 12.6.3, 12.10.4.1, 12.10.7 Considered Security Best practice until 31 March 2025

For any Not Tested responses, identify which subrequirements were not tested and the reason.



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 g	25 July 2024			
Date Assessment ended: Note: This is the last date that evidence was ga	27 September 2024			
Were any requirements in the ROC unable to b	e met due to a legal	constraint?	☐ Yes ⊠ No	
Were any testing activities performed remotely lf yes, for each testing activity below, indicate were performed:	⊠ Yes □ No			
Examine documentation	⊠ Yes	☐ No		
Interview personnel	■ Interview personnel			
Examine/observe live data				
Observe process being performed				
Observe physical environment				
Interactive testing				
Other: -	☐ 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 27 September 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):						
	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 <i>Tripode Partners Group S.L.</i> 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 <i>PCI DSS</i> , Version 4.0 and was completed according to the instructions therein.
\boxtimes	All information within the above-referenced ROC and in this attestation fairly represents the results of the Assessment in all material respects.
\boxtimes	PCI DSS controls will be maintained at all times, as applicable to the entity's environment.

Part 3b. Service Provider Attestation

Signature of Service Provider Executive Officer ↑	Date: 27 September 2024	
Service Provider Executive Officer Name: Óscar Sánchez	Title: Responsable seguridad	

Part 3c. Qualified Security Assessor (QSA) Acknowledgement

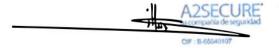
If a QSA was involved or assisted with this Assessment, indicate the role performed:

☑ QSA performed testing procedures.

☑ QSA provided other assistance.

If selected, describe all role(s) performed: QSA has assisted with PCI-DSS insights and advice on how to interpret the requirements but has not conducted a formal PCI DSS audit.

> 08003 Barcelona T: 93 394 56 00 F: 98 394 56 01



T: 93 394 56 00 F: 98 394 58 01

Signature of Lead QSA 1 Date: 27 September 2024

Lead QSA Name: Guillem Cuesta



Signature of Duly Authorized Officer of QSA Company ↑	Date: 27 September 2024
Duly Authorized Officer Name: Albert Morell	QSA Company: A2 Secure Tecnologias



	Informatica S.L.					
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.					
Assessment, indicate the fole performed.	☐ 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
		YES	NO	Requirement)
1	Install and maintain network security controls			-
2	Apply secure configurations to all system components			-
3	Protect stored account data			-
4	Protect cardholder data with strong cryptography during transmission over open, public networks			-
5	Protect all systems and networks from malicious software			-
6	Develop and maintain secure systems and software			-
7	Restrict access to system components and cardholder data by business need to know			-
8	Identify users and authenticate access to system components			-
9	Restrict physical access to cardholder data			-
10	Log and monitor all access to system components and cardholder data			-
11	Test security systems and networks regularly			-
12	Support information security with organizational policies and programs			-
Appendix A1	Additional PCI DSS Requirements for Multi- Tenant Service Providers			-
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card- Present POS POI Terminal Connections			-











