Payment Card Industry

3-D Secure (PCI 3DS)

Attestation of Compliance

For use with PCI 3DS Core Security Standard v1.0

Revision 1.0

December 2017

Section 1: 3DS Assessment Information

Instructions for Submission

This Attestation of Compliance must be completed as a declaration of the results of the 3DS entity's assessment with the *PCI 3DS Security Requirements and Assessment Procedures for EMV® 3-D Secure Core Components: ACS, DS, and 3DS Server* (PCI 3DS Core Security Standard). Complete all sections. The 3DS entity is responsible for ensuring that each section is completed by the relevant parties, as applicable. Contact the payment brands for PCI 3DS reporting and submission procedures.

Part 1. 3DS Entity and 3DS Assessor Information

Part 1a. 3DS Entity Organization Information

Company Name:	Google, LLC	DBA (doing business as):	Google Cloud Platform (GCP)
Contact Name:	John Mulder	Title:	Director Compliance Assurance and Audit
Telephone:	650-253-0000	E-mail:	gcp-pci@google.com
Business Address:	1600 Amphitheatre Parkway	City:	Mountain View
State/Province:	CA	Country:	USA		Zip:	94043
URL:	https://cloud.google.com		

Part 1b. 3DS Assessor Company Information

Company Name:	Coalfire Systems, Inc.		
Lead 3DS Assessor Contact Name:	Sam Pfanstiel	Title:	Principal
Telephone:	(877) 224-8077	E-mail:	sam.pfanstiel@coalfire.com
Business Address:	8480 E Orchard Rd., Suite 5800	City:	Greenwood Village
State/Province:	CO	Country:	USA		Zip:	80111
URL:	https://www.coalfire.com		

Part 2. Executive Summary

Part 2a. 3DS Functions

Identify the 3DS Function(s) covered by this 3DS assessment (Check all that apply)	Details of EMVCo Letter of Approval (LOA):
☐ 3DS Server (3DSS)	LOA reference number: Date of LOA issued by EMVCo: Name of product LOA issued for:
☐ Access Control Server (ACS)	LOA reference number: Date of LOA issued by EMVCo: Name of product LOA issued for:
☐ Directory Server (DS)	LOA reference number: Date of LOA issued by EMVCo: Name of product LOA issued for:

☒ Other *(As defined by a payment brand)*	Service Provider (See description below)

Note: If your organization performs 3DS functions that are not covered by this assessment, consult the applicable payment brand about validation for the other functions.

Part 2b. Description of 3DS Business

| How and in what capacity does your business provide/manage 3DS functions? | Google, LLC. (Google Cloud Platform) offers their customers Infrastructure as a Service (IaaS), Platform as a Service (PaaS), FaaS (Function as a Service) and CaaS (Container as a Service) solutions, which customers may use to store, process, or transmit 3DS data. Google Cloud does not provide any 3DS component or service (neither 3DS Server (3DSS), 3DS Directory Server (DS), nor 3DS Access Control Server (ACS); nor does Google Cloud store, process, or transmit 3DS data for its own business.

Google Cloud customers are responsible for the security of the 3DS data they store, process, or transmit.

PCI 3DS and PCI DSS responsibility summary matrices are essential documents required to understand the responsibilities between GCP and its customers.

Per PCI SSC FAQ Article 1487, a 3DS entity can choose to outsource the hosting and management of its HSM infrastructure to a third-party service provider if the applicable requirements are met. Entities performing 3DS functions who use the GCP environment for hosting their 3DE are still subject to the PCI 3DS Core Security Standard and will need to have their environment assessed for all applicable requirements.

Coalfire and GCP agreed upon the engagement based on the below statement within the 3DS Core Security Standard v1.0, Oct 2017, Page 11, under "**Use of Third-Party Service Providers / Outsourcing**":

Service providers may be required to demonstrate compliance with the applicable PCI 3DS requirements based on the provided service. The service provider may do so by … undergoing a PCI 3DS assessment and providing evidence to its 3DS entity customers to demonstrate its compliance to applicable PCI 3DS requirements. |
|---|---|

Part 2c. Locations

List types of facilities (for example, corporate offices, data centers) and a summary of locations covered by the PCI 3DS assessment.

Type of facility	Number of facilities of this type	Location(s) of facility (city, country)
Data Centers	130	North America

| | | • Arcola, VA, United States of America
• Ashburn (1), VA, United States of America
• Ashburn (2), VA, United States of America
• Ashburn (3), VA, United States of America
• Ashburn (4), VA, United States of America
• Ashburn (IAD39), VA, United States of America
• Atlanta (1), GA, United States of America
• Atlanta (2), GA, United States of America
• Clarksville, TN, United States of America
• Columbus (1), OH, United States of America
• Columbus (2), OH, United States of America
• Council Bluffs (1), IA, United States of America
• Council Bluffs (2), IA, United States of America
• Council Bluffs (CBF65), IA, United States of America
• Henderson, NV, United States of America
• Hillsboro (HIO03), OR, United States of America
• Lancaster, OH, United States of America
• Las Vegas, NV, United States of America
• Leesburg, VA, United States of America
• Lenoir, NC, United States of America
• Los Angeles (1), CA, United States of America
• Los Angeles (2), CA, United States of America
• Los Angeles (3), CA, United States of America
• Markham, ON, Canada
• Midlothian, TX, United States of America
• Midlothian (DFW36), TX, United States of America
• Moncks Corner, SC, United States of America
• Montreal (1), QC, Canada
• Montreal (2), QC, Canada
• New Albany, OH, United States of America
• Omaha, NE, United States of America
• Papillion, NE, United States of America
• Phoenix (1), AZ, United States of America
• Phoenix (2), AZ, United States of America
• Pryor Creek, OK, United States of America
• Reno, NV, United States of America
• Salt Lake City (1), UT, United States of America
• Salt Lake City (2), UT, United States of America
• Salt Lake City (3), UT, United States of America
• The Dalles (1), OR, United States of America
• The Dalles (2), OR, United States of America
• Toronto, ON, Canada
• Widows Creek, AL, United States of America

South America
• Osasco, Brazil
• Quilicura (1), Santiago, Chile
• Santana de Parnaíba, Brazil
• Vinhedo, Brazil

Asia Pacific |

		• Changhua, Taiwan
		• Delhi (1), India
		• Delhi (2), India
		• Hong Kong (1), Hong Kong
		• Hong Kong (2), Hong Kong
		• Hong Kong (3), Hong Kong
		• Koto-ku (2), Tokyo, Japan
		• Koto-ku (3), Tokyo, Japan
		• Lok Yang Way, Singapore
		• Inzai, Chiba, Japan
		• Jakarta (1), Indonesia
		• Jakarta (2), Indonesia
		• Jakarta (3), Indonesia
		• Koto-ku (1), Tokyo, Japan
		• Loyang, Singapore
		• Melbourne (1), Australia
		• Melbourne (2), Australia
		• Mumbai (1), India
		• Mumbai (2), India
		• Mumbai (3), India
		• Mumbai (4), India
		• Osaka (2), Japan
		• Osaka, Japan
		• Seoul (1), South Korea
		• Seoul (2), South Korea
		• Seoul (3), South Korea
		• Sydney (1), NSW, Australia
		• Sydney (2), NSW, Australia
		• Sydney (3), NSW, Australia
		• Sydney (4), NSW, Australia
		• Wenya, Singapore
		EMEA
		• Berlin (1), Germany
		• Berlin (2), Germany
		• Berlin (3), Germany
		• Dammam, Saudi Arabia
		• Doha (1), Qatar
		• Doha (2), Qatar
		• Dublin, Ireland
		• Eemshaven, Groningen, the Netherlands
		• Eemshaven (GRQ23), Groningen, the Netherlands
		• Frankfurt (1), Hesse, Germany
		• Frankfurt (2), Hesse, Germany
		• Frankfurt (3), Hesse, Germany
		• Frankfurt (4), Hesse, Germany
		• Frankfurt (5), Hesse, Germany
		• Frankfurt (6), Hesse, Germany
		• Frankfurt (7), Hesse, Germany
		• Frankfurt (8), Hesse, Germany

		· Frankfurt (FRA56), Hesse, Germany
		· Fredericia, Denmark
		· Ghlin, Hainaut, Belgium
		· Hamina, Finland
		· London (1), United Kingdom
		· London (2), United Kingdom
		· London (3), United Kingdom
		· London (4), United Kingdom
		· London (5), United Kingdom
		· London (6), United Kingdom
		· Madrid (1), Spain
		· Madrid (2), Spain
		· Madrid (3), Spain
		· Middenmeer, Noord-Holland, the Netherlands
		· Milan (1), Italy
		· Milan (2), Italy
		· Milan (3), Italy
		· Paris (1), France
		· Paris (2), France
		· Paris (3), France
		· Tel Aviv (1), Israel
		· Tel Aviv (2), Israel
		· Tel Aviv (3), Israel
		· Turin (1), Italy
		· Turin (2), Italy
		· Turin (3), Italy
		· Warsaw (1), Poland
		· Warsaw (2), Poland
		· Warsaw (3), Poland
		· Zurich (1), Switzerland
		· Zurich (2), Switzerland
		· Zurich (3), Switzerland
		Africa
		· Johannesburg (1), South Africa
		· Johannesburg (2), South Africa
		· Johannesburg (3), South Africa

Part 2d.

Not used for this AOC

Part 2e. Description of Environment

Provide a ***high-level*** description of the environment covered by this assessment.	GCP offers its customers IaaS, PaaS, SaaS, FaaS and CaaS solutions, which may be used by customers to host their 3DS environment (3DE) to perform 3DS functions and/or store, process, or transmit 3DS sensitive data.
For example: • *Connections into and out of the 3DS environment (3DE).*	GCP is hosted on the Google Common Infrastructure (GCI), which is infrastructure private to Google. GCP leverages common processes implemented in the GCI

• *Critical system components within the 3DE, such as 3DS servers, databases, web servers, etc., and any other necessary 3DS components, as applicable.*	environment; these processes were assessed independently and found PCI DSS compliant. GCI is a Level 1 PCI DSS v4.0 validated Service Provider with AOC dated 12/01/2023. GCP is a Level 1 PCI DSS v4.0 validated Service Provider with AOCs dated 15-Dec-2023 and 03-May-2024.
Does your business use network segmentation to affect the scope of your 3DS environment?	☒Yes ☐ No

Part 2f. Third-Party Service Providers

Does your company share 3DS data with any third-party service providers (for example, payment processors, gateways)?	☐ Yes ☒ No
Does your company rely on any third party for any PCI 3DS requirements, or for support or maintenance of the 3DS environment?	☐ Yes ☒ No

If Yes:

Name of service provider:	Description of services provided:
N/A	N/A

Part 2g. Summary of requirements tested to the PCI 3DS Security Standard

Did the 3DS entity leverage a PCI DSS assessment to meet the PCI 3DS Part 1: Baseline Security Requirements?	☒Yes ☐ No

Identify the appropriate assessment result for each high-level PCI 3DS requirement. Complete the table as follows:

- *If the results of a PCI DSS assessment have been verified as meeting all the PCI 3DS Part 1 Requirements:*
    - Select "In Place per PCI DSS" for the 3DS Part 1 Requirements.
    - Select the appropriate finding for each PCI 3DS Part 2 Requirement.
- *If a PCI DSS assessment is not being leveraged to meet all the PCI 3DS Part 1 Requirements:*
    - Select the appropriate finding for each 3DS Part 1 and Part 2 Requirement.

When determining the appropriate finding for each high-level 3DS requirement, the following principles apply:

1. If the finding for any requirement or sub-requirement is "Not in Place", select "Not in Place" for the high-level requirement.
2. If the finding for any requirement or sub-requirement is "N/A" and all other requirements are "In Place", select "In Place" for the high-level requirement..
3. If the finding for any requirement or sub-requirement is "In Place w/CCW" and all other requirements are "In Place", select "In Place w/CCW" for the high-level requirement.
4. If the findings include one or more requirements or sub-requirements as "N/A", and one or more as "In Place w/CCW", and all other requirements are "In Place", select "In Place w/CCW" for the high-level requirement.
5. If all requirements and sub-requirements are identified as "In Place", select "In Place" for the high-level requirement.

Summary of Findings		In Place per PCI DSS		In Place	In Place w/CCW	N/A	Not in Place
Part 1: Baseline Security Requirements							
P1-1	Maintain security policies for all personnel			☐	☐	☐	☐
P1-2	Secure network connectivity			☐	☐	☐	☐
P1-3	Develop and maintain secure systems			☐	☐	☐	☐
P1-4	Vulnerability management	☒	**OR**	☐	☐	☐	☐
P1-5	Manage access			☐	☐	☐	☐
P1-6	Physical security			☐	☐	☐	☐
P1-7	Incident response preparedness			☐	☐	☐	☐
Part 2: 3DS Security Requirements							
P2-1	Validate scope			☒	☐	☐	☐
P2-2	Security governance			☒	☐	☐	☐
P2-3	Protect 3DS systems and applications			☒	☐	☐	☐
P2-4	Secure logical access to 3DS systems			☒	☐	☐	☐
P2-5	Protect 3DS data			☒	☐	☐	☐
P2-6	Cryptography and key management			☒	☐	☐	☐
P2-7	Physically secure 3DS systems			☒	☐	☐	☐

Section 2: Report on Compliance

This Attestation of Compliance reflects the results of an onsite PCI 3DS assessment, which is documented in an accompanying 3DS Report on Compliance (ROC).

The assessment documented in this attestation and in the 3DS ROC was completed on:	*26 June 2024*	
Was PCI DSS used to meet PCI 3DS Part 1: Baseline Security Requirements?	☒ Yes	☐ No
Have compensating controls been used to meet any PCI 3DS requirement?	☐ Yes	☒ No
Were any PCI 3DS requirements identified as being not applicable (N/A)?	☒ Yes	☐ No
Were any PCI 3DS requirements unable to be met due to a legal constraint?	☐ Yes	☒ No

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Section 3: Validation and Attestation Details

Part 3. PCI 3DS Validation

This AOC is based on results noted in the 3DS ROC dated *26 June 2024.*

Based on the results documented in the 3DS 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):***

☒	**Compliant:** All sections of the PCI 3DS ROC are complete, all questions answered affirmatively, resulting in an overall **COMPLIANT** rating; thereby *Google, LLC* has demonstrated full compliance with the PCI 3DS Core Security Standard.
☐	**Non-Compliant:** Not all sections of the PCI 3DS ROC are complete, or not all questions are answered affirmatively, resulting in an overall **NON-COMPLIANT** rating, thereby *(3DS Entity Company Name)* has not demonstrated full compliance with the PCI 3DS Core Security Standard. **Target Date** for Compliance: 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. *Check with the applicable payment brand(s) before completing Part 4.*
☐	**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 the applicable payment brand(s). *If checked, complete the following:* <table><tr><th>Affected Requirement</th><th>Details of how legal constraint prevents requirement being met</th></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr></table>

Part 3a. Acknowledgement of Status

Signatory(s) confirms:

(Check all that apply)

☒	The 3DS ROC was completed according to the PCI 3DS Core Security Standard, Version *1.0*, and was completed according to the instructions therein.
☒	All information within the above-referenced 3DS ROC and in this attestation fairly represents the results of my assessment in all material respects.
☒	I have read the PCI 3DS Core Security Standard and I recognize that I must maintain compliance, as applicable to my environment, at all times.
☒	If my environment changes, I recognize I must reassess my environment and implement any additional PCI 3DS requirements that apply.
☒	ASV scans are being completed by the PCI SSC Approved Scanning Vendor *Qualys*

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Part 3b. 3DS Entity Attestation

DocuSigned by:

J.A. Mulder

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Signature of 3DS Entity Executive Officer ↑	*Date:*
3DS Entity Executive Officer Name: **John Mulder**	*Title:* **Director Compliance Assurance and Audit**

Part 3c. 3DS Assessor Acknowledgement

DocuSigned by:

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Signature of Duly Authorized Officer of 3DS Assessor Company ↑	*Date:*
Duly Authorized Officer Name: **Sam Pfanstiel**	*Title:* ***Principal***
3DS Assessor Company: **Coalfire Systems, Inc.**	

Part 4. Action Plan for Non-Compliant Requirements

Select the appropriate response for "Compliant to PCI 3DS 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 3DS Requirement	Compliant to PCI 3DS Requirements *(Select One)*		Remediation Date and Actions (If "NO" selected for any Requirement)
		YES	NO	
P1	Maintain security policies for all personnel	☒	☐	
	Secure network connectivity	☒	☐	
	Develop and maintain secure systems	☒	☐	
	Vulnerability management	☒	☐	
	Manage access	☒	☐	
	Physical security	☒	☐	
	Incident response preparedness	☒	☐	
P2	Validate scope	☒	☐	
	Security governance	☒	☐	
	Protect 3DS systems and applications	☒	☐	
	Secure logical access to 3DS systems	☒	☐	
	Protect 3DS data	☒	☐	
	Cryptography and key management	☒	☐	
	Physically secure 3DS systems	☒	☐	