

Google Cloud PCI DSS AoC Reports

What's in this report?

- 2024 GCP Attestation of Compliance (AoC); covers the certified GCP products
- 2023 GCI Attestation of Compliance (AoC); covers the underlying technology stack

Why are there multiple AoCs?

We perform PCI DSS validation of Google Common Infrastructure (GCI) each Fall. The GCI PCI DSS audit assesses our core infrastructure (machines, networking, storage, etc.), our information security processes and our physical security. The GCI assessment accounts for roughly 85% of Google's overall PCI DSS effort. GCP products are built on top of GCI; the Spring GCP PCI DSS audit leverages the GCI AoC & Report on Compliance (RoC) and accounts for the remaining PCI DSS effort. The GCP audit certifies the application and web layers of all new and already certified GCP products. Furthermore, we perform a supplemental GCP PCI audit in the Fall, once again leveraging the GCI AoC & RoC, for all new GCP products that become generally available after the Spring audit.

Why do we do it this way?

The reason we do this is to make the audit process more manageable and to allow new GCP products to attain PCI DSS certification twice per annum, in both the Spring and Fall assessments, without having to perform another full audit. While there are multiple AoCs, consolidation of reports provides coverage of the in-scope GCP environment.



Payment Card Industry Data Security Standard

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Attestation of Compliance for Report on Compliance – Service Providers

Version 4.0

Publication Date: March 2022



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

Entity Name: Google LLC

Assessment End Date: 04/18/2024

Date of Report as noted in the Report on Compliance: 05/03/2024

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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:	Google LLC
DBA (doing business as):	Google Cloud Platform (GCP)
Company mailing address:	1600 Amphitheatre Pkwy Mountain View, CA 94043
Company main website:	https://cloud.google.com
Company contact name:	John Mulder
Company contact title:	Director Compliance Assurance and Audit
Contact phone number:	650-253-0000
Contact e-mail address:	gcp-pci@google.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):	Joe Nangle
Qualified Security Assessor	
Company name:	Coalfire Systems, Inc.
Company mailing address:	8480 E Orchard Rd., Suite 5800 Greenwood Village, CO 80111
Company website:	https://www.coalfire.com
Lead Assessor name:	David Miller
Assessor phone number:	877-224-8077



Assessor e-mail address:	CoalfireSubmission@coalfire.com
Assessor certificate number:	QSA # 206-014

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:	<p>The following GCP services were included in this assessment:</p> <ol style="list-style-type: none"> 1. Access Approval 2. Access Context Manager 3. Access Transparency 4. Advanced API Security 5. Agent Assist 6. AI Platform Deep Learning Container 7. AI Platform Training and Prediction 8. AlloyDB 9. Anthos Service Mesh 10. Anti-Money Laundering AI 11. API Gateway 12. Apigee 13. App Engine 14. Application Integration 15. Artifact Analysis 16. Artifact Registry 17. Assured Workloads 18. AutoML Natural Language 19. AutoML Tables 20. AutoML Translation 21. AutoML Video 22. AutoML Vision 23. Backup for GKE 24. Bare Metal HSM 25. Bare Metal Rack HSM 26. Batch 27. BeyondCorp Enterprise 28. BigQuery 29. BigQuery Data Transfer Service 30. Binary Authorization 31. CCAI Platform 32. Certificate Authority Service 33. Certificate Manager 34. Chronicle SIEM 35. Cloud Asset Inventory 36. Cloud Bigtable 37. Cloud Billing 38. Cloud Build 39. Cloud CDN 40. Cloud Composer 41. Cloud Console 42. Cloud Console App 43. Cloud Data Fusion 44. Cloud Deployment Manager 45. Cloud DNS 46. Cloud Endpoints 47. Cloud External Key Manager (Cloud EKM) 48. Cloud Filestore
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49. Cloud Firewall
50. Cloud Functions
51. Cloud Functions for Firebase
52. Cloud Healthcare
53. Cloud HSM
54. Cloud Identity
55. Cloud IDS (Cloud Intrusion Detection System)
56. Cloud Interconnect
57. Cloud Key Management Service
58. Cloud Life Sciences (formerly Google Genomics)
59. Cloud Load Balancing
60. Cloud Logging
61. Cloud Monitoring
62. Cloud NAT (network address translation)
63. Cloud Natural Language API
64. Cloud Profiler
65. Cloud Router
66. Cloud Run
67. Cloud Run for Anthos
68. Cloud Scheduler
69. Cloud Service Mesh
70. Cloud Shell
71. Cloud Source Repositories
72. Cloud Spanner
73. Cloud Speaker ID
74. Cloud SQL
75. Cloud Storage
76. Cloud Storage for Firebase
77. Cloud Tasks
78. Cloud Trace
79. Cloud Translation
80. Cloud Vision
81. Cloud VPN
82. Cloud Workstations
83. Compute Engine
84. Connect
85. Contact Center AI (CCAI)
86. Contact Center AI Insights
87. Container Registry
88. Data Catalog
89. Database Migration Service
90. Dataflow
91. Dataform
92. Dataplex
93. Dataproc
94. Dataproc Metastore
95. Datastore
96. Datastream
97. Dialogflow
98. Document AI
99. Document AI Warehouse
100. Eventarc
101. Firebase Authentication
102. Firestore
103. Gemini for Google Cloud
104. Generative AI on Vertex AI
105. GKE Enterprise Config Management
106. GKE Identity Service
107. Google Cloud Armor
108. Google Cloud Deploy
109. Google Cloud Identity-Aware Proxy

- 110. Google Cloud Marketplace
- 111. Google Cloud SDK
- 112. Google Cloud Threat Intelligence for Chronicle
- 113. Google Kubernetes Engine
- 114. Healthcare Data Engine
- 115. Hub
- 116. Identity & Access Management (IAM)
- 117. Identity Platform
- 118. Infrastructure Manager
- 119. Integration Connectors
- 120. Key Access Justifications (KAJ)
- 121. Looker Studio
- 122. Managed Service for Microsoft Active Directory (AD)
- 123. Media CDN
- 124. Memorystore
- 125. Migrate to Virtual Machines
- 126. Network Connectivity Center
- 127. Network Intelligence Center
- 128. Network Service Tiers
- 129. Persistent Disk
- 130. Pub/Sub
- 131. reCAPTCHA Enterprise
- 132. Recommender
- 133. Resource Manager API
- 134. Risk Manager
- 135. Secret Manager
- 136. Secure Source Manager
- 137. Secure Web Proxy (Cloud SWP)
- 138. Security Command Center
- 139. Sensitive Data Protection (including Cloud Data Loss Prevention)
- 140. Service Directory
- 141. Service Infrastructure
- 142. Speech-to-Text
- 143. Storage Transfer Service
- 144. Talent Solution
- 145. Text-to-Speech
- 146. Traffic Director
- 147. Transfer Appliance
- 148. Vertex AI Codey
- 149. Vertex AI Colab Enterprise
- 150. Vertex AI Conversation
- 151. Vertex AI Data Labeling
- 152. Vertex AI Platform
- 153. Vertex AI Search
- 154. Vertex AI Workbench Instances
- 155. Video Intelligence API
- 156. Virtual Private Cloud
- 157. VPC Service Controls
- 158. Web Risk API
- 159. Workflows
- 160. Workload Manager

Type of service(s) assessed:



Hosting Provider: <input checked="" type="checkbox"/> Applications / software <input checked="" type="checkbox"/> Hardware <input type="checkbox"/> Infrastructure / Network <input type="checkbox"/> Physical space (co-location) <input checked="" type="checkbox"/> Storage <input checked="" type="checkbox"/> Web-hosting services <input checked="" type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input checked="" type="checkbox"/> Multi-Tenant Service Provider <input type="checkbox"/> Other Hosting (specify):	Managed Services (specify): <input type="checkbox"/> Systems security services <input type="checkbox"/> IT support <input type="checkbox"/> Physical security <input type="checkbox"/> Terminal Management System <input checked="" type="checkbox"/> Other services (specify): Software as a Service (SaaS) Infrastructure as a Service (IaaS) Platform as a Service (PaaS) Function as a Service (FaaS) Containers as a Service (CaaS)	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):		

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.

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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: GCP Services not listed in Part 2g of this AOC were excluded from this PCI DSS Assessment.

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 (specify): <input type="checkbox"/> Systems security services <input type="checkbox"/> IT support <input type="checkbox"/> Physical security <input type="checkbox"/> Terminal Management System <input type="checkbox"/> Other services (specify):	Payment Processing: <input 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"/> 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: Not Applicable

Part 2b. Description of Role with Payment Cards (ROC Section 2.1)

Describe how the business stores, processes, and/or transmits account data.	Google Cloud Platform (GCP) does not store, process, or transmit account data for its own business. GCP customers are responsible for the security of the account data they store, process, or transmit.
Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.	Google Cloud Platform (GCP) customers build their CDEs using Google Cloud services. The security and compliance of these services directly affects the security and compliance of the customer's services.
Describe system components that could impact the security of account data.	GCP does not directly store, process, or transmit account data for its own business. However, Google Cloud Platform, GCP products may be used by customers to host or support their cardholder data



	environment (CDE). Therefore, the GCP environment was assessed with the assumption all customer data was account data, but GCP customers are responsible for their own PCI DSS compliance.
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Part 2c. Description of Payment Card Environment

<p>Provide a high-level description of the environment covered by this Assessment.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Connections into and out of the cardholder data environment (CDE).</i> • <i>Critical system components within the CDE, such as POI devices, databases, web servers, etc., and any other necessary payment components, as applicable.</i> • <i>System components that could impact the security of account data.</i> 	<p>GCP offers its customers IaaS, PaaS, SaaS, FaaS and CaaS solutions, which may be used by customers to host their cardholder data environment (CDE) to store, process, or transmit account data.</p> <p>GCP is hosted on the Google Common Infrastructure (GCI), which is infrastructure private to Google. GCP leverages common processes implemented in the GCI 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.</p>
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<p>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)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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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)
Data Center	130	North America <ul style="list-style-type: none"> • 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

		<ul style="list-style-type: none"> • 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 <p>South America</p> <ul style="list-style-type: none"> • Osasco, Brazil • Quilicura (1), Santiago, Chile • Santana de Parnaíba, Brazil • Vinhedo, Brazil <p>Asia Pacific</p> <ul style="list-style-type: none"> • Changhua, Taiwan • Delhi (1), India • Delhi (2), India • Hong Kong (1), Hong Kong • Hong Kong (2), Hong Kong • Hong Kong (3), Hong Kong • Inzai, Chiba, Japan • Jakarta (1), Indonesia • Jakarta (2), Indonesia • Jakarta (3), Indonesia • Koto-ku (1), Tokyo, Japan • Koto-ku (2), Tokyo, Japan • Koto-ku (3), Tokyo, Japan • Lok Yang Way, Singapore
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		<ul style="list-style-type: none"> • 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 <p>EMEA</p> <ul style="list-style-type: none"> • 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
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		<ul style="list-style-type: none"> • 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 <p>Africa</p> <ul style="list-style-type: none"> • Johannesburg (1), South Africa • Johannesburg (2), South Africa • Johannesburg (3), South Africa
<p>Corporate Offices (not in scope for Requirement 9.x)</p>	<p>139</p>	<p>North America</p> <ul style="list-style-type: none"> • Addison, TX, United States of America • Ann Arbor, MI, United States of America • Atlanta, GA, United States of America • Austin, TX, United States of America • Bellevue, WA, United States of America • Boston, MA, United States of America • Bothell, WA, United States of America • Boulder, CO, United States of America • Calgary, AB, Canada • Cambridge, MA, United States of America • Chapel Hill, NC, United States of America • Charlotte, NC, United States of America • Chicago, IL, United States of America • Detroit, MI, United States of America • Durham, NC, United States of America • Fremont, CA, United States of America • Goleta, CA, United States of America • Houston, TX, United States of America • Irvine, CA, United States of America • Kirkland, WA, United States of America • Kitchener, ON, Canada • Los Angeles, CA, United States of America • Madison, WI, United States of America • Mexico City, Mexico • Miami, FL, United States of America • Montreal, QC, Canada • Mountain View, CA, United States of America • Mountain View, CA, United States of America • Nashville, TN, United States of America • New York, NY, United States of America • Ottawa, ON, Canada • Palo Alto, CA, United States of America • Pittsburgh, PA, United States of America • Playa Vista, CA, United States of America

		<ul style="list-style-type: none"> • Portland, OR, United States of America • Princeton, NJ, United States of America • Redmond, WA, United States of America • Redwood City, CA, United States of America • Reston, VA, United States of America • Salt Lake City, UT, United States of America • San Bruno, CA, United States of America • San Diego, CA, United States of America • San Francisco, CA, United States of America • San Jose, CA, United States of America • Santa Cruz, CA, United States of America • Seattle, WA, United States of America • South San Francisco, CA, United States of America • Southaven, MS, United States of America • Sunnyvale, CA, United States of America • Thornton, CO, United States of America • Toronto, ON, Canada • Vancouver, BC, Canada • Washington D.C., DC, United States of America <p>South America</p> <ul style="list-style-type: none"> • Belo Horizonte, Brazil • Bogota, Colombia • Buenos Aires, Argentina • Lima, Peru • Santiago, Chile • Sao Paulo, Brazil <p>Asia Pacific</p> <ul style="list-style-type: none"> • Auckland, New Zealand • Bangalore, India • Bangkok, Thailand • Beijing, China • Brisbane, Australia • Cebu City, Philippines • Gurgaon, India • Hanoi, Vietnam • Hong Kong, Hong Kong • Hyderabad, India • Kuala Lumpur, Malaysia • Manila, Philippines • Melbourne, Australia • Mumbai, India • New Delhi, India • New Taipei City, Taiwan • Osaka, Japan • Perth, Australia • Pune, India • Quezon City, Philippines • Seoul, South Korea • Shanghai, China • Shenzhen, China • Singapore, Singapore • South Jakarta, Indonesia • Sydney, Australia • Taipei, Taiwan • Taoyuan, Taiwan
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		<ul style="list-style-type: none"> • Tokyo, Japan • Zhubei City, Taiwan <p>EMEA</p> <ul style="list-style-type: none"> • Aarhus, Denmark • Amsterdam, The Netherlands • Athens, Greece • Barcelona, Spain • Berlin, Germany • Brussels, Belgium • Bucharest, Romania • Budapest, Hungary • Copenhagen, Denmark • Cork, Ireland • Doha, Qatar • Dubai, United Arab Emirates • Dublin, Ireland • Espoo, Finland • Frankfurt, Germany • Gdansk, Poland • Ghent, Belgium • Grenoble, France • Haifa, Israel • Hamburg, Germany • Helsinki, Finland • Istanbul, Turkey • Krakow, Poland • Lisbon, Portugal • London, United Kingdom • Madrid, Spain • Malaga, Spain • Manchester, United Kingdom • Milan, Italy • Munich, Germany • Oslo, Norway • Ottignies-Louvain-la-Neuve, Belgium • Paris, France • Prague, Czech Republic • Ramat Gan, Israel • Rome, Italy • Stockholm, Sweden • Tel Aviv, Israel • Viby, Denmark • Vienna, Austria • Vilnius, Lithuania • Warsaw, Poland • Wroclaw, Poland • Zagreb, Croatia • Zurich, Switzerland <p>Africa</p> <ul style="list-style-type: none"> • Accra, Ghana • Cairo, Egypt • Johannesburg, South Africa • Lagos, Nigeria • Nairobi, Kenya
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**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
Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable

* 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 (PA-DSS), Point to Point Encryption (P2PE) solutions, Software-Based PIN Entry on COTS (SPoC) solutions, and Contactless Payments on COTS (CPoC) solutions).

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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:
Google Common Infrastructure (GCI)	Infrastructure, tools, and processes used to build the Google Cloud Platform (GCP)

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

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Part 2g. Summary of Assessment
(ROC Section 1.8.1)

Indicate below all responses provided within each principal PCI DSS requirement.

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	
	In Place	Not Applicable	Not Tested	Not in Place	Customized Approach	Compensating Controls
Requirement 1:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 2:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 3:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 4:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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"/>	<input type="checkbox"/>
Requirement 6:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 7:	<input checked="" type="checkbox"/>	<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"/>	<input type="checkbox"/>
Requirement 9:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 10:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 11:	<input checked="" type="checkbox"/>	<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"/>	<input type="checkbox"/>
Appendix A1:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>	<input type="checkbox"/>



Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3.2)

Date Assessment began: <i>Note: This is the first date that evidence was gathered, or observations were made.</i>	02/01/2024
Date Assessment ended: <i>Note: This is the last date that evidence was gathered, or observations were made.</i>	04/18/2024
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? If yes, for each testing activity below, indicate whether remote assessment activities were performed: <ul style="list-style-type: none"> • Examine documentation <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No • Interview personnel <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No • Examine/observe live data <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No • Observe process being performed <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No • Observe physical environment <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No • Interactive testing <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No • Other: Not Applicable 	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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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 05/03/2024.

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*):

<input checked="" type="checkbox"/>	<p>Compliant: All sections of the PCI DSS ROC are complete, and all assessed requirements are marked as being either 1) In Place, 2) In Place with Remediation, or 3) Not Applicable, resulting in an overall COMPLIANT rating; thereby <i>Google LLC (Google Cloud Platform) e</i> 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 <i>Not Applicable</i> has not demonstrated compliance with PCI DSS requirements.</p> <p>Target Date for Compliance: Not Applicable</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 1) In Place, 2) In Place with Remediation, or 3) Not Applicable, resulting in an overall COMPLIANT BUT WITH LEGAL EXCEPTION rating; thereby <i>Not Applicable</i> 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" style="width: 100%;"> <thead> <tr> <th style="width: 35%;">Affected Requirement</th> <th>Details of how legal constraint prevents requirement from being met</th> </tr> </thead> <tbody> <tr> <td>Not Applicable</td> <td>Not Applicable</td> </tr> </tbody> </table>	Affected Requirement	Details of how legal constraint prevents requirement from being met	Not Applicable	Not Applicable
Affected Requirement	Details of how legal constraint prevents requirement from being met				
Not Applicable	Not Applicable				



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 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

DocuSigned by:
J.A. Mulder
CFC7CB9FTAAP4C6...
 Signature of Service Provider Executive Officer ↑

Date:

Service Provider Executive Officer Name: **John Mulder** Title: **Director Compliance Assurance and Audit**

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: Conducted PCI DSS v4.0 assessment and documented compliance results in the Report on Compliance (ROC) and the associated Attestation of Compliance (AOC).

DocuSigned by:
David Miller
5982E287E874453...
 Signature of Lead QSA ↑

Date:

Lead QSA Name: **David Miller**

DocuSigned by:
Humberto Zepeda
A1A383D2DA834A1...
 Signature of Duly Authorized Officer of QSA Company ↑

Date:

Duly Authorized Officer Name: **Humberto Zepeda** QSA Company: **Coalfire Systems, 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: ISA (Joe Nangle) assisted in the collection of assessment evidence and



	demonstrations of PCI DSS controls implementation on behalf of GCP
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thehonestskeptic@gmail.com



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"/>	





Payment Card Industry Data Security Standard

thehonestskeptic@gmail.com

Attestation of Compliance for Report on Compliance – Service Providers

Version 4.0

Revision 1

Publication Date: December 2022



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

Entity Name: Google, LLC. DBA: Google Common Infrastructure (GCI)

Assessment End Date: 12/01/2023

Date of Report as noted in the Report on Compliance: 12/01/2023

thehonestkeeper@gmail.com



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:	Google, LLC.
DBA (doing business as):	Google Common Infrastructure (GCI)
Company mailing address:	1600 Amphitheatre Pkwy, Mountain View, CA 94043
Company main website:	https://cloud.google.com
Company contact name:	Jeanette Manfra
Company contact title:	Senior Director, Global Risk and Compliance (Cloud CISO)
Contact phone number:	650-253-0000
Contact e-mail address:	gcp-pci@google.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):	Joe Nangle
Qualified Security Assessor	
Company name:	Coalfire Systems, Inc.
Company mailing address:	8480 E Orchard Rd., Suite 5800, Greenwood Village, CO 80111
Company website:	https://www.coalfire.com
Lead Assessor name:	David Miller
Assessor phone number:	877-224-8077
Assessor e-mail address:	coalfiresubmissions@coalfire.com
Assessor certificate number:	206-014



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: Google Common Infrastructure (GCI)

Type of service(s) assessed:

Hosting Provider:	Managed Services:	Payment Processing:
<input checked="" type="checkbox"/> Applications / software <input type="checkbox"/> Hardware <input checked="" type="checkbox"/> Infrastructure / Network <input type="checkbox"/> Physical space (co-location) <input checked="" type="checkbox"/> Storage <input checked="" type="checkbox"/> Web-hosting services <input checked="" 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 checked="" type="checkbox"/> Systems security services <input type="checkbox"/> IT support <input checked="" type="checkbox"/> Physical security <input type="checkbox"/> Terminal Management System <input type="checkbox"/> Other services (specify):	<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):		

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 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:	Services not listed above were excluded from this assessment	
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:	Not Applicable	

Part 2b. Description of Role with Payment Cards (ROC Section 2.1)

Describe how the business stores, processes, and/or transmits account data.	Google, LLC. (Google) is an American multinational technology company that specializes in Internet-related services and products, which include online advertising technologies, a search engine, cloud computing, software, and hardware. Google offers an extensive suite of cloud computing products which include AI and Machine Learning, Compute, Databases, Networking, Operations, Security and Identity, Storage, etc. which are collectively referred to as the Google Cloud Platform (GCP). GCP is designed to meet customers' security, privacy, uptime, and compliance requirements. GCP is built on top of a common backbone infrastructure referred to as Google Common
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	<p>Infrastructure (GCI). GCI dynamically allocates hardware and software resources across multiple Google-owned data centers and third-party managed colocation data centers.</p> <p>This Level 1 PCI DSS validation is focused on the Google Common Infrastructure (GCI), and it includes the following categories of services used in support of GCP:</p> <ul style="list-style-type: none"> • Networks • Compute • Data Centers • Resource Management • Data Storage
<p>Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.</p>	<p>Google Cloud products build their CDEs using Google Common Infrastructure (GCI) services. The security and compliance of these services directly affects the security and compliance of the customer's services.</p>
<p>Describe system components that could impact the security of account data.</p>	<p>System components within the CDE that could impact the security of account data:</p> <ul style="list-style-type: none"> • Firewalls, routers, and switches • Servers • Storage • Encryption and Key Management <p>Support Systems</p> <ul style="list-style-type: none"> • Administrative Workstations/Laptops • Multi-factor authentication • Access Authorization • Change Management • File Integrity Monitoring • Intrusion Detection Systems • Logging and Alerting • Internal Vulnerability Scanning • External ASV Scanning • Penetration Testing

Part 2c. Description of Payment Card Environment

<p>Provide a high-level description of the environment covered by this Assessment.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> • <i>Connections into and out of the cardholder data environment (CDE).</i> • <i>Critical system components within the CDE, such as POI devices, databases, web servers, etc., and any other necessary payment components, as applicable.</i> • <i>System components that could impact the security of account data.</i> 	<p>GCI's cardholder data environment (CDE) is hosted within multiple Google-owned and third-party managed data centers across the globe. Logical access to the GCI servers and systems is authenticated by using SSH public/private key pair and Low Overhead Authentication</p>
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	<p>Service (LOAS) certificates along with Titan Security Key for multi-factor authentication.</p> <p>The critical system components within the CDE that were assessed include:</p> <ul style="list-style-type: none"> • Firewalls, routers, and switches • Servers • Storage • Encryption and Key Management <p>Support Systems</p> <ul style="list-style-type: none"> • Administrative Workstations/Laptops • Multi-factor authentication • Access Authorization • Change Management • File Integrity Monitoring • Intrusion Detection Systems • Logging and Alerting • Internal Vulnerability Scanning • External ASV Scanning • Penetration Testing
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<p>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)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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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)
Data Centers	117	<p><u>North America</u></p> <ul style="list-style-type: none"> • 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 • Atlanta (1), GA, United States of America • Atlanta (2), GA, United States of America

		<ul style="list-style-type: none">• 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• Henderson, NV, 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• Midlothian, 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• Papillion, NE, United States of America• Phoenix, 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 <p><u>South America</u></p>
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		<ul style="list-style-type: none"> • Osasco, Brazil • Quilicura (1), Santiago, Chile • Vinhedo, Brazil <p><u>Asia Pacific</u></p> <ul style="list-style-type: none"> • Changhua, Taiwan • Delhi (1), India • Delhi (2), India • Hong Kong (1), Hong Kong • Hong Kong (2), Hong Kong • Hong Kong (3), Hong Kong • Inzai City, Chiba, Japan • Jakarta (1), Indonesia • Jakarta (2), Indonesia • Jakarta (3), Indonesia • Koto-ku (1), Tokyo, Japan • Koto-ku (2), Tokyo, Japan • Koto-ku (3), Tokyo, Japan • Lok Yang Way, Singapore • Loyang, Singapore • Melbourne (1), Victoria, Australia • Melbourne (2), Victoria, Australia • Mumbai (1), India • Mumbai (2), India • Mumbai (3), India • Mumbai (4), India • 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 • Wenyua, Singapore <p><u>EMEA</u></p> <ul style="list-style-type: none"> • Berlin (1), Germany • Berlin (2), Germany • Berlin (3), Germany • Dammam, Saudi Arabia • Doha (1), Qatar • Doha (2), Qatar • Dublin, Ireland • Eemshaven, 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
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		<ul style="list-style-type: none"> • Fredericia, Denmark • Ghlin, Hainaut, Belgium • Hamina, Finland • Johannesburg (1), South Africa • Johannesburg (2), South Africa • Johannesburg (3), South Africa • 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
Offices	139	<p><u>North America</u></p> <ul style="list-style-type: none"> • Calgary, AB, Canada • Montreal, QC, Canada • Ottawa, ON, Canada • Toronto, ON, Canada • Vancouver, BC, Canada • Kitchener, ON, Canada • Mexico City, Mexico • Ann Arbor, MI, United States of America • Atlanta, GA, United States of America • Austin, TX, United States of America • Washington, WA, United States of America • Boulder, CO, United States of America

		<ul style="list-style-type: none">• Nashville, TN, United States of America• Boston, MA, United States of America• Bothell, WA, United States of America• Bellevue, WA, United States of America• Cambridge, MA, United States of America• Chapel Hill, NC, United States of America• Chicago, IL, United States of America• Charlotte, NC, United States of America• Addison, TX, United States of America• Detroit, MI, United States of America• Fremont, CA, United States of America• Houston, TX, United States of America• Irvine, CA, United States of America• Kirkland, WA, United States of America• Los Angeles, CA, United States of America• Mountain View, CA, United States of America• Miami, FL, United States of America• Madison, WI, United States of America• Mountain View, CA, United States of America• New York, NY, United States of America• Palo Alto, CA, United States of America• Princeton, NJ, United States of America• Portland, OR, United States of America• Pittsburgh, PA, United States of America• Playa Vista, CA, United States of America• Durham, NC, United States of America• Reston, VA, United States of America• Redmond, WA, United States of America• Redwood City, CA, United States of America
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thehonestskeptic@gmail.com

		<ul style="list-style-type: none">• San Diego, CA, United States of America• Goleta, CA, United States of America• San Bruno, CA, United States of America• Seattle, WA, United States of America• San Francisco, CA, United States of America• San Jose, CA, United States of America• Salt Lake City, UT, United States of America• Santa Cruz, CA, United States of America• South San Francisco, CA, United States of America• Sunnyvale, CA, United States of America• Southaven, MS, United States of America• Thornton, CO, United States of America• Washington, D.C., United States of America <p><u>South America</u></p> <ul style="list-style-type: none">• Buenos Aires, Argentina• Belo Horizonte, Brazil• Sao Paulo, Brazil• Santiago, Chile• Bogota, Colombia• Lima, Peru <p><u>Asia Pacific</u></p> <ul style="list-style-type: none">• Brisbane, Australia• Melbourne, Australia• Perth, Australia• Sydney, Australia• Beijing, China• Shanghai, China• Shenzhen, China• Hong Kong, Hong Kong• South Jakarta, Indonesia• Bangalore, India• New Delhi, India• Gurgaon, India• Hyderabad, India• Mumbai, India• Pune, India• Osaka, Japan• Tokyo, Japan• Seoul, South Korea• Kuala Lumpur, Malaysia
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		<ul style="list-style-type: none"> • Auckland, New Zealand • Cebu City, Philippines • Manila, Philippines • Quezon City, Philippines • Singapore, Singapore • Bangkok, Thailand • New Taipei City, Taiwan • Taoyuan, Taiwan • Taipei, Taiwan • Zhubei City, Taiwan • Hanoi, Vietnam <p><u>EMEA</u></p> <ul style="list-style-type: none"> • Dubai, United Arab Emirates • Vienna, Austria • Brussels, Belgium • Ghent, Belgium • Ottignies-Louvain-la-Neuve, Belgium • Zurich, Switzerland • Prague, Czech Republic • Berlin, Germany • Frankfurt, Germany • Hamburg, Germany • Munich, Germany • Viby, Denmark • Copenhagen, Denmark • Cairo, Egypt • Barcelona, Spain • Madrid, Spain • Malaga, Spain • Espoo, Finland • Helsinki, Finland • Grenoble, France • Paris, France • Accra, Ghana • Athens, Greece • Zagreb, Croatia • Budapest, Hungary • Dublin, Ireland • Cork, Ireland • Haifa, Israel • Ramat Gan, Israel • Tel Aviv, Israel • Milan, Italy • Rome, Italy • Nairobi, Kenya • Vilnius, Lithuania • Lagos, Nigeria • Amsterdam, The Netherlands • Oslo, Norway • Gdansk, Poland • Krakow, Poland • Warsaw, Poland • Wroclaw, Poland
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thehonestskeptic@gmail.com

		<ul style="list-style-type: none">• Lisbon, Portugal• Doha, Qatar• Bucharest, Romania• Stockholm, Sweden• Istanbul, Turkey• London, United Kingdom• Manchester, United Kingdom• Johannesburg, South Africa
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thehonestskeptic@gmail.com



**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
Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable

* 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 (PA-DSS), Point to Point Encryption (P2PE) solutions, Software-Based PIN Entry on COTS (SPoC) solutions, and Contactless Payments on COTS (CPoC) solutions).

thehonestskeptic@gmail.com



**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:
AirTrunk	Colocation Hosting Provider
Aligned Energy	Colocation Hosting Provider
Ark	Colocation Hosting Provider
Ascenty	Colocation Hosting Provider
AT Tokyo	Colocation Hosting Provider
Atman	Colocation Hosting Provider
Cologix	Colocation Hosting Provider
Compass Datacenters	Colocation Hosting Provider
CoreSite	Colocation Hosting Provider
CyrusOne	Colocation Hosting Provider
DATA4	Colocation Hosting Provider
DCI Indonesia	Colocation Hosting Provider
Digital Realty	Colocation Hosting Provider
Edgeconnex	Colocation Hosting Provider
Equinix	Colocation Hosting Provider
E-Shelter Security	Colocation Hosting Provider
Etix Everywhere / Main DC	Colocation Hosting Provider
Global Switch	Colocation Hosting Provider
Green Datacenter	Colocation Hosting Provider
Iron Mountain	Colocation Hosting Provider
KT	Colocation Hosting Provider



LG U+	Colocation Hosting Provider
Macquarie Group	Colocation Hosting Provider
Netmagic	Colocation Hosting Provider
NTT	Colocation Hosting Provider
OneAsia	Colocation Hosting Provider
Ooredoo	Colocation Hosting Provider
PCCW	Colocation Hosting Provider
QTS	Colocation Hosting Provider
SDS	Colocation Hosting Provider
Sentinel Data Centers	Colocation Hosting Provider
SFR	Colocation Hosting Provider
SiFy Technologies	Colocation Hosting Provider
SK Broadband, Inc.	Colocation Hosting Provider
Switch	Colocation Hosting Provider
Telecom India	Colocation Hosting Provider
Telefonica	Colocation Hosting Provider
Teraco	Colocation Hosting Provider
TIM	Colocation Hosting Provider
Vantage	Colocation Hosting Provider
Virtus	Colocation Hosting Provider
Yondr Netherlands BV	Colocation Hosting Provider
Yotta	Colocation Hosting Provider

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



**Part 2g. Summary of Assessment
(ROC Section 1.8.1)**

Indicate below all responses provided within each principal PCI DSS requirement.

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	
	In Place	Not Applicable	Not Tested	Not in Place	Customized Approach	Compensating Controls
Requirement 1:	<input checked="" type="checkbox"/>	<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"/>	<input type="checkbox"/>
Requirement 3:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 4:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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"/>	<input type="checkbox"/>
Requirement 6:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 7:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 8:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Requirement 9:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 10:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 11:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Requirement 12:	<input checked="" type="checkbox"/>	<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"/>	<input type="checkbox"/>
Appendix A2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3.2)

Date Assessment began: <i>Note: This is the first date that evidence was gathered, or observations were made.</i>		08/10/2023
Date Assessment ended: <i>Note: This is the last date that evidence was gathered, or observations were made.</i>		12/01/2023
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? If yes, for each testing activity below, indicate whether remote assessment activities were performed:		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
• Examine documentation	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
• Interview personnel	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
• Examine/observe live data	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
• Observe process being performed	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
• Observe physical environment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
• Interactive testing	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
• Other: Not Applicable	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

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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 12/01/2023).

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 <i>Google Common Infrastructure (GCI)</i> 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 <i>Not Applicable</i> has not demonstrated compliance with PCI DSS requirements.</p> <p>Target Date for Compliance: Not Applicable</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 <i>Not Applicable</i> 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" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #f2f2f2;"> <th style="text-align: left;">Affected Requirement</th> <th style="text-align: left;">Details of how legal constraint prevents requirement from being met</th> </tr> </thead> <tbody> <tr> <td>Not Applicable</td> <td>Not Applicable</td> </tr> </tbody> </table>	Affected Requirement	Details of how legal constraint prevents requirement from being met	Not Applicable	Not Applicable
Affected Requirement	Details of how legal constraint prevents requirement from being met				
Not Applicable	Not Applicable				



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 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

DocuSigned by:

CA2DF0510F34486...
 Signature of Service Provider Executive Officer ↑


Date:

Service Provider Executive Officer Name: **Jeanette Manfra** Title: **Senior Director, Global Risk and Compliance (Cloud CISO)**

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: Not Applicable

DocuSigned by:

5982E207E874455...
 Signature of Lead QSA ↑

Date:

Lead QSA Name: **David Miller**

DocuSigned by:

A1A363D2DA834A1...
 Signature of Duly Authorized Officer of QSA Company ↑

Date:

Duly Authorized Officer Name: **Humberto Zepeda** QSA Company: **Coalfire Systems, 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: ISAs assisted in the collection of assessment evidence and onsite controls testing.

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 checked="" type="checkbox"/>	<input type="checkbox"/>	
2	Apply secure configurations to all system components	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3	Protect stored account data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4	Protect cardholder data with strong cryptography during transmission over open, public networks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5	Protect all systems and networks from malicious software	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6	Develop and maintain secure systems and software	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7	Restrict access to system components and cardholder data by business need to know	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8	Identify users and authenticate access to system components	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9	Restrict physical access to cardholder data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10	Log and monitor all access to system components and cardholder data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11	Test security systems and networks regularly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12	Support information security with organizational policies and programs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Appendix A1	Additional PCI DSS Requirements for Multi-Tenant Service Providers	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	

