





PCI DSS Assessment

Attestation of Compliance

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Payment Card Industry Data Security Standard

Attestation of Compliance for Report on Compliance – Service Providers

Version 4.0.1

Publication Date: August 2024



PCI DSS v4.0.1 Attestation of Compliance for Report on Compliance – Service Providers

Entity Name: Little Pond Ltd DBA Prommt

Date of Report as noted in the Report on Compliance: 24 July 2025

Date Assessment Ended: 17 July 2025



Section 1: Assessment Information

Instructions for Submission

This Attestation of Compliance (AOC) must be completed as a declaration of the results of the service provider's assessment against the Payment Card Industry Data Security Standard (PCI DSS) Requirements and Testing Procedures ("Assessment"). Complete all sections. The service provider is responsible for ensuring that each section is completed by the relevant parties, as applicable. Contact the entity(ies) to which this AOC will be submitted for reporting and submission procedures.

This AOC reflects the results documented in an associated Report on Compliance (ROC). Associated ROC sections are noted in each AOC Part/Section below.

Capitalized terms used but not otherwise defined in this document have the meanings set forth in the PCI DSS Report on Compliance Template.

Part 1. Contact Information		
Part 1a. Assessed Entity (ROC Section 1.1)		
Company name:	Little Pond Ltd.	
DBA (doing business as):	Prommt	
Company mailing address:	The Greenway	
	Ardilaun Court,	
	St Stephen's Green,	
	Dublin 2,	
	D02 TD28,	
	Ireland	
Company main website:	https://www.prommt.com/	
Company contact name:	Paul Healy	
Company contact title:	Head of Engineering	
Contact phone number:	+353 1 539 2300	
Contact e-mail address:	paul.healy@prommt.com	
Part 1b. Assessor		

(ROC Section 1.1)

Provide the following information for all assessors involved in the Assessment. If there was no assessor for a given assessor type, enter Not Applicable.

PCI SSC Internal Security Assessor(s)	
ISA name(s):	Not Applicable
Qualified Security Assessor	
Company name:	Patronusec Sp. z o.o.



Company mailing address:	Św. Marcin 29/8, 61-806 Poznań, Pola	nd		
Company website:	https://patronusec.com			
Lead Assessor name:	Christopher Ince			
Assessor phone number:	+44 7857851666			
Assessor e-mail address:	PCIQA@patronusec.com			
Assessor certificate number:	PCI DSS QSA 205-825			
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:	Prommt			
Type of service(s) assessed:				
Hosting Provider: ☐ Applications / software ☐ Hardware ☐ Infrastructure / Network ☐ Physical space (co-location) ☐ Storage ☐ Web-hosting services ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Multi-Tenant Service Provider ☐ Other Hosting (specify):	Managed Services: ☐ Systems security services ☐ IT support ☐ Physical security ☐ Terminal Management System ☐ Other services (specify):	Payment Processing: ☐ POI / card present ☐ Internet / e-commerce ☐ MOTO / Call Center ☐ ATM ☐ Other processing (specify):		
Account Management	☐ Fraud and Chargeback	☐ Payment Gateway/Switch		
☐ Back-Office Services	☐ Issuer Processing	☐ Prepaid Services		
☐ Billing Management	☐ Loyalty Programs	Records Management		
☐ Clearing and Settlement	☐ Merchant Services	☐ Tax/Government Payments		
☐ Network Provider				
☐ Others (specify): Payment integration provider				
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: Not Applicable 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 ☐ Infrastructure / Network ☐ Physical security MOTO / Call Center ☐ Physical space (co-location) ☐ Terminal Management System \square ATM ☐ Storage Other services (specify): ☐ Other processing (specify): ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Multi-Tenant Service Provider ☐ Other Hosting (specify): ☐ Payment Gateway/Switch ☐ Account Management ☐ Fraud and Chargeback ☐ Back-Office Services ☐ Issuer Processing ☐ Prepaid Services ☐ Billing Management ☐ Loyalty Programs ☐ Records Management ☐ Clearing and Settlement ☐ Tax/Government Payments □ Network Provider Others (specify): Provide a brief explanation why any checked services Not Applicable were not included in the Assessment: Part 2b. Description of Role with Payment Cards (ROC Sections 2.1 and 3.1) Describe how the business stores, processes, and/or Little Pond Ltd., hereafter referred to as Prommt, is an etransmits account data. commerce integration service provider. Prommt has developed a payment integration solution that sits between merchants and acquires providing prompts via SMS or email to customers to make payments via the acquirer(s) that the merchant has a relationship with. Processing:



Prommt connects to each PCI compliant Payment Service Provider directly via their specific API or iFrame solution. No processing of cardholder data occurs on the Prommt system.

Transmitting:

Cardholder data is transmitted to each PCI compliant Payment Service Provider via TLS 1.2 session utilizing their native API to undertake the processing of cardholder data.

Storing:

Prommt stores tokenised customer details in a MySQL database and stores it in encrypted and hash format. Hashes generated are used to search the database to verify if the card data is already in the database transaction.

Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.

Prommt brokers encrypted payment requests between cardholders and PCI-compliant gateways, making its control of TLS certificates, cipher suites, and API endpoints critical for transit security. While storing only tokenized card references, the strength of Prommt's key management and database access controls determines token security.

Prommt's infrastructure components—including Cloudflare edge protection, AWS VPC with load balancers, security groups, and GuardDuty monitoring—enforce network segmentation and threat detection. Any misconfiguration could compromise the entire cardholder data environment.

Additionally, Prommt's merchant portal and SDKs control API key management and role-based access permissions. Poor configuration could enable attackers to redirect payment flows or access stored tokens.

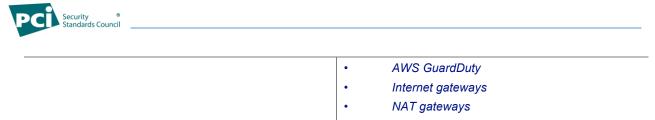
Prommt's cryptographic controls, infrastructure security, and operational safeguards are therefore essential to protecting customer account data throughout the payment process.

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

Prommt uses the following components in its CDE which are included in this assessment:

For e-commerce payments:

- Cloudflare
- AWS Fleet Manager
- AWS Load Balancer
- AWS Virtual Private Cloud
- AWS EC2 Security Groups





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.

Prommt, as a service provider, hosts its CDE on a PCI DSS compliant cloud-based Amazon Web Services (AWS) infrastructure.

The following processes and procedures performed by Prommt can impact the security of cardholder data:

- Protecting the AWS-based CDE from unauthorized access and operations.
- Ensuring secure cardholder data transmission from the cardholder to the merchants' choice of PCI compliant payment service provider.

Prommt services only card-not-present payment transactions.

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
Amazon Web Service (AWS) Cloud Hosting provider	1	Dublin, Republic of Ireland



Part 2e. PCI SSC Validated Products and Solutions (ROC Section 3.3)

Does the entity use any ite	m identified on any PCI SSC Lists of Validated Products and Solutions.*?
☐ Yes	

Provide the following information regarding each item the entity uses from PCI SSC's Lists of Validated Products and Solutions:

Name of PCI SSC	Version of	PCI SSC Standard to	PCI SSC Listing	Expiry Date of Listing
validated Product or	Product or	which Product or	Reference	
Solution	Solution	Solution Was Validated	Number	
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, Point to Point Encryption (P2PE) solutions, Software-Based PIN Entry on COTS (SPoC) solutions, Contactless Payments on COTS (CPoC) solutions), and Mobile Payments on COTS (MPoC) products.



Part 2f. Third-Party Service Providers (ROC Section 4.4)

For the services being validated, does the er that:	ntity have relationships with one or more third-part	y service providers			
• 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					
network security control services, anti-ma	 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) 				
Could impact the security of the entity's C remote access, and/or bespoke software	DE (for example, vendors providing support via developers).	⊠ Yes □ No			
If Yes:					
Name of Service Provider:	Description of Services Provided:				
Amazon Web Services	Cloud Infrastructure Provider				
Global Payments	Payment Processor				
Paysafe	Payment Processor				
PXP	Payment Processor				
Stripe	Payment Processor				
Fiserv/Cover/Carat	Payment Processor				
Worldpay	Payment Processor				
Euronet	Payment Processor				
Cybersource	Payment Processor				
Freedompay	Payment Processor				
Planet	Payment Processor				
Chase	Payment Processor				
Barclaycard	Payment Processor				
Natwest Tyl	Payment Processor				
Adyen	Payment Processor				
AIBMS	Payment Processor				
Elavon/Opayo	Payment Processor				



Lloyds Cardnet

Payment Processor

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.

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: Prommt

	1				
PCI DSS Requirement	Requirement Finding More than one response may be selected for a given requirement. Indicate all responses that apply.				Select If a Compensating Control(s) Was
	In Place	Not Applicable	Not Tested	Not in Place	Used
Requirement 1:	\boxtimes				
Requirement 2:	\boxtimes	\boxtimes			
Requirement 3:	\boxtimes	\boxtimes			
Requirement 4:	\boxtimes	\boxtimes			
Requirement 5:	\boxtimes	\boxtimes			
Requirement 6:	\boxtimes	\boxtimes			
Requirement 7:	\boxtimes				
Requirement 8:	\boxtimes	\boxtimes			
Requirement 9:	\boxtimes	\boxtimes			
Requirement 10:	\boxtimes	\boxtimes			
Requirement 11:	\boxtimes	\boxtimes			
Requirement 12:	\boxtimes	\boxtimes			
Appendix A1:		\boxtimes			
Appendix A2:		\boxtimes			
Justification for Approach					

Justification for Approach



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

- 2.2.5 Prommt do not use any insecure services, protocols or deamons within the CDE.
- 2.3.1 2.3.2 No wireless technology is in use or is connected to the CDE.
- 3.1.2 3.3.2- Prommt does not store or receive PAN and SAD within its systems.
- 3.3.3 -Prommt is not an issuer and does not support issuing services.
- 3.4.1 3.7.9- Prommt does not store or receive PAN and SAD within its systems.
- 4.2.1.2 No wireless networks transmitting cardholder data or connected to Prommt's CDE
- 4.2.2 Prommt doesn't send PAN via end-user messaging technologies
- 5.2.3 5.2.3.1- Prommt considers all system components to be at risk for malware
- 5.3.2 a- Proomt employs continuous behavioral analysis.
- 5.3.3 No removeable meaid in use.
- 6.2.3.1 Prommt is using automated code scanning solution
- 6.4.1 This requirement no longer applies as of 31 March 2025
- 6.5.2 No significant change occurred within the past 12 months.
- 8.2.3 Prommt does not have remote access to the customers' premises
- 8.2.7 No vendors providing remote management services to Prommt.
- 8.3.10 There is no customer user access to cardholder data.
- 8.3.10.1 There is no customer user access to cardholder data.
- 9.4.1 9.4.7 Prommt does not generate, store, or back up cardholder data in any form or media.
- 9.5.1 9.5.1.3 Prommt does not own any point-of-sale systems and is not responsible for the point-of-sale systems owned by customers at their sites.
- 10.4.2.1 Prommt uses Datadog for continuous realtime log monitoring with immediate SOC alerts, eliminating the need for periodic reviews or risk analysis.
- 10.7.1 This requirement no longer applies as of 31 March 2025
- 11.4.7 Prommt is not a multi-tenant hosting provider



	12.3.2 – Prommt does not use Customized Approach to meet any requirements. Appendix A1 – Prommt is not multi-tenant Service Provider. Appendix A2 – Prommt does not manage POI terminal
	nor is responsible for their configuration.
For any Not Tested responses, identify which sub- requirements were not tested and the reason.	Not Applicable



Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3)

Date Assessment began: Note: This is the first date that evidence was gathered, or observations were made.	03 June 2025
Date Assessment ended: Note: This is the last date that evidence was gathered, or observations were made.	17 July 2025
Were any requirements in the ROC unable to be met due to a legal constraint?	☐ Yes ⊠ No
Were any testing activities performed remotely?	⊠ Yes □ No



Section 3 Validation and Attestation Details

Part 3. PCI DSS Validation (ROC Section 1.7)

Indica S Fu as Pa as Base as ap	All requirement of Not Tested in the ROC. Artial Assessment — One or more Not Tested in the ROC. Any requirement of Not Tested in the ROC. Any requirement of the ROC is the results documented in the opticable, assert(s) the following of	in the ROC dated 24 July 2025. PCI DSS assessment was completed: Its have been assessed and therefore no requirements were marked e requirements have not been assessed and were therefore marked uirement not assessed is noted as Not Tested in Part 2g above. The ROC noted above, each signatory identified in any of Parts 3b-3d, compliance status for the entity identified in Part 2 of this document	
(sele	as being either In Place or Not A	PCI DSS ROC are complete, and all assessed requirements are marked applicable, resulting in an overall COMPLIANT rating; thereby Little Pondince with all PCI DSS requirements except those noted as Not Tested	
	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.		
	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 P instructions therein.	he ROC was completed according to <i>PCI DSS</i> , Version 4.0.1 and was completed according to the structions therein.						
	All information within the above-reference Assessment in all material respects.	erenced ROC and in this attestation fairly represents the results of the s.						
	PCI DSS controls will be maintained at a	PCI DSS controls will be maintained at all times, as applicable to the entity's environment.						
Part 3b. Service Provider Attestation								
Donal McGuinness								
Signature of Service Provider Executive Officer ↑			Date: 24-Jul-2025 08:49:20 BST					
Servi	ce Provider Executive Officer Name: Dona	l McGuinness	Title: CEO					
Part	3c. Qualified Security Assessor (Q	SA) Acknowledger	ment					
	QSA was involved or assisted with this	☐ QSA performed testing procedures.						
Assessment, indicate the role performed:		☐ QSA provided other assistance. If selected, describe all role(s) performed:						
fhe								
Signa	ature of Lead QSA ↑		Date: 24-Jul-2025 01:42:19 PDT					
Lead QSA Name: Christopher Ince								
Guerra Suyul								
Signature of Duly Authorized Officer of QSA Company ↑			Date: 24-Jul-2025 10:51:51 CEST					
Duly Authorized Officer Name: Agnieszka Leszczyńska			QSA Company: Patronusec Sp. z o.o.					
Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement								
	ISA(s) was involved or assisted with this essment, indicate the role performed:	☐ ISA(s) performed testing procedures.						
ASSE		☐ 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			

Note: The PCI Security Standards Council is a global standards body that provides resources for payment security professionals developed collaboratively with our stakeholder community. Our materials are accepted in numerous compliance programs worldwide. Please check with your individual compliance accepting organization to ensure that this form is acceptable in their program. For more information about PCI SSC and our stakeholder community please visit: https://www.pcisecuritystandards.org/about_us/