



Payment Card Industry (PCI) Data Security Standard

Attestation of Compliance for Onsite Assessments - Service Providers

A QSA led assessment of compliance validation according to the Payment Card Industry Data Security Standards and Security Assessment Procedures version 3.2.1.

Level 1 Service Provider Validation: According to the service provider validation requirements defined by the payment brands (including VISA, MasterCard, JCB, American Express and Discover) in PCI industry, the annual onsite review by QSA for level 1 service provider could be compulsory.

Alibaba Cloud (Singapore) Private Limited

For Alibaba Cloud CDN and DCDN Service

Report Date: September 10, 2020

Initial Compliance Date: December 31, 2018

Report Number: C131-55-2020-B

The assessment remains valid for 12 months



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*The attestation of compliance is based on the template (version 3.2.1, June 2018)
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Section 1: Assessment Information

Instructions for Submission

This Attestation of Compliance must be completed as a declaration of the results of the service provider's assessment with the *Payment Card Industry Data Security Standard Requirements and Security Assessment Procedures (PCI DSS)*. Complete all sections: The service provider is responsible for ensuring that each section is completed by the relevant parties, as applicable. Contact the requesting payment brand for reporting and submission procedures.

Part 1. Service Provider and Qualified Security Assessor Information

Part 1a. Service Provider Organization Information

Company Name:	Alibaba Cloud (Singapore) Private Limited (Branded as “Alibaba Cloud”)		DBA (doing business as):	N/A		
Contact Name:	Irene Wang		Title:	Senior Security Compliance Manager		
Telephone:	+65 87678528		E-mail:	irene.wang@alibaba-inc.com		
Business Address:	8 Shenton Way #45-01, AXA Tower, Singapore, 068811		City:	Singapore		
State/Province:	-	Country:	Singapore		Zip:	068811
URL:	https://www.alibabacloud.com					

Part 1b. Qualified Security Assessor Company Information (if applicable)

Company Name:	atsec (Beijing) Information Technology Co., Ltd				
Lead QSA Contact Name:	Jinyun Chen	Title:	QSA, Principal Consultant		
Telephone:	+86 10 5305 6679	E-mail:	jinyun@atsec.com		
Business Address:	3/F, Block C, Bld.1, Boya C-Center, Life Science Park, Changping District, Beijing, P.R. China, 102206	City:	Beijing		
State/Province:	-	Country:	P.R. China	Zip:	102206
URL:	https://www.atsec.com				

Part 2. Executive Summary

Part 2a. Scope Verification

Services that were INCLUDED in the scope of the PCI DSS Assessment (check all that apply):

Name of service(s) assessed: Content Delivery Network of Alibaba Cloud Public Cloud International Services (hereinafter referred to as "Alibaba Cloud CDN") and Dynamic Content Delivery Network of Alibaba Cloud Public Cloud International Services (hereinafter referred to as "DCDN")

Type of service(s) assessed:

Hosting Provider:

- ☐ Applications / software
- ☐ Hardware
- ☒ Infrastructure / Network
- ☐ Physical space (co-location)
- ☐ Storage
- ☐ Web
- ☐ Security services
- ☐ 3-D Secure Hosting Provider
- ☐ Shared Hosting Provider
- ☐ Other Hosting (specify):

Managed Services (specify):

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

Payment Processing:

- ☐ POS / 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):

Note: These categories are provided for assistance only, and are not intended to limit or predetermine an entity's service description. If you feel these categories don't apply to your service, complete "Others." If you're unsure whether a category could apply to your service, consult with the applicable payment brand.

Part 2a. Scope Verification <i>(continued)</i>		
Services that are provided by the service provider but were NOT INCLUDED in the scope of the PCI DSS Assessment (check all that apply):		
Name of service(s) not assessed:	All other services provided by Alibaba Cloud in Public Cloud International Services environment are not included in the scope of PCI DSS assessment (except Alibaba Cloud CDN and DCDN services).	
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 <input type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input type="checkbox"/> Shared Hosting 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"/> POS / 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:	Based on business decision from Alibaba Cloud, above-mentioned services were not included in this PCI DSS assessment.	

Part 2b. Description of Payment Card Business

Describe how and in what capacity your business stores, processes, and/or transmits cardholder data.

Alibaba Cloud CDN provides accelerate static content delivery service, and DCDN provides accelerate static and dynamic content delivery service to its clients including e-business merchants, payment service providers, banks, etc. During the data transmission, the Alibaba Cloud CDN and DCDN provide strong HTTPS cryptographic transmission tunnels capability based on the TLS certificates provided by its clients. Sensitive authentication data (including CAV2/CVV2/CVC2/CID) and cardholder data (including PAN, expiration date and cardholder name) are held in the VRAM (Volatile Random-Access Memory) and purged immediately after business process. Neither sensitive authentication data nor cardholder data are stored in the cardholder data environment.

Describe how and in what capacity your business is otherwise involved in or has the ability to impact the security of cardholder data.

All the related components of Alibaba Cloud CDN and DCDN services are hardened according to the same security baseline and managed by the same vulnerability and patch management policies. The cloud services which are not included in the scope of this QSA assessment are put in different zone of the clusters and separated via strict access controls. The access controls are enforced by the core switch within Alibaba Cloud Public Cloud CDN and DCDN services environment.

Part 2c. Locations

List types of facilities (for example, retail outlets, corporate offices, data centers, call centers, etc.) and a summary of locations included in the PCI DSS review.

Type of facility:	Number of facilities of this type	Location(s) of facility (city, country):
<i>Example: Retail Outlets</i>	3	<i>Boston, MA, USA</i>
Office Network	2	<ul style="list-style-type: none"> ■ Hangzhou Office is located in Apsara Park, Shilongshan Road, Xihu District, Hangzhou City, Zhejiang Province, P.R.China, 310024 ■ Singapore Office is located in 8 Shenton Way #45-01, AXA Tower, 068811, Singapore
Datacenter	94	<ul style="list-style-type: none"> ■ 7 CDN data centers in Hong Kong region ■ 2 CDN data centers in Macau region ■ 4 CDN data centers in Taiwan region ■ 2 CDN data centers in Australia region ■ 2 CDN data centers in Germany region ■ 6 CDN data centers in Malaysia region ■ 9 CDN data centers in Indonesia region

		<ul style="list-style-type: none"> ■ 9 CDN data centers in India region ■ 1 CDN data center in United Kingdom region ■ 3 CDN data centers in Japan region ■ 3 CDN data centers in Republic of Korea region ■ 6 CDN data centers in Thailand region ■ 3 CDN data centers in Philippines region ■ 4 CDN data centers in Vietnam region ■ 1 CDN data center in Kuwait region ■ 1 CDN data center in State of Qatar region ■ 1 CDN data center in Sultanate of Oman region ■ 4 CDN data centers in Russian Federation region ■ 1 CDN data center in Ukraine region ■ 1 CDN data center in France region ■ 1 CDN data center in Netherlands region ■ 2 CDN data centers in Spain region ■ 1 CDN data center in Italy region ■ 1 CDN data center in Sweden region ■ 1 CDN data center in South Africa region ■ 1 CDN data center in Brazil region ■ 7 CDN data centers in Singapore region <p><i>Note: The detail location of above datacenters are removed based on Alibaba Cloud's confidential requirement. The detail addresses of those datacenters are recorded in the ROC which release by atsec (Beijing) information Technology Co., Ltd at September 7, 2020</i></p>
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Part 2d. Payment Applications

Does the organization use one or more Payment Applications? ☐ Yes ☒ No

Provide the following information regarding the Payment Applications your organization uses:

Payment Application Name	Version Number	Application Vendor	Is application PA-DSS Listed?	PA-DSS Listing Expiry date (if applicable)
Not applicable.				

Part 2e. Description of 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 POS devices, databases, web servers, etc., and any other necessary payment components, as applicable.*

All system components of this PCI DSS QSA assessment are located in Alibaba Cloud Public Cloud International Services' Data Centers. Alibaba Cloud CDN and DCDN services only provide OpenAPI for remote management and traceability IP address with security mechanism for clients to deliver content on its nodes network. It's Alibaba Cloud CDN and DCDN clients' responsibility to secure the transmission tunnel of which between end-user and original websites.

The critical system components involved in this QSA scope include Alibaba Cloud

	<p>CDN and DCDN Mapping system, Supporting System, Caching System, bastion machine, and NTP server.</p> <p>Only the security of cloud infrastructure and related administration security mechanisms are covered in this PCI DSS assessment.</p>
<p>Does your business use network segmentation to affect the scope of your PCI DSS environment?</p> <p><i>(Refer to “Network Segmentation” section of PCI DSS for guidance on network segmentation)</i></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

Part 2f. Third-Party Service Providers

Does your company have a relationship with a Qualified Integrator & Reseller (QIR) for the purpose of the services being validated? ☐ Yes ☒ No

If Yes:

Name of QIR Company:	Not applicable.
QIR Individual Name:	Not applicable.
Description of services provided by QIR:	Not applicable.

Does your company have a relationship with one or more third-party service providers (for example, Qualified Integrator Resellers (QIR), gateways, payment processors, payment service providers (PSP), web-hosting companies, airline booking agents, loyalty program agents, etc.) for the purpose of the services being validated? ☐ Yes ☒ No

If Yes:

Name of service provider:	Description of services provided:
Not applicable.	

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

Part 2g. Summary of Requirements Tested

For each PCI DSS Requirement, select one of the following:

- **Full** – The requirement and all sub-requirements of that requirement were assessed, and no sub-requirements were marked as “Not Tested” or “Not Applicable” in the ROC.
- **Partial** – One or more sub-requirements of that requirement were marked as “Not Tested” or “Not Applicable” in the ROC.
- **None** – All sub-requirements of that requirement were marked as “Not Tested” and/or “Not Applicable” in the ROC.

For all requirements identified as either “Partial” or “None,” provide details in the “Justification for Approach” column, including:

- Details of specific sub-requirements that were marked as either “Not Tested” and/or “Not Applicable” in the ROC
- Reason why sub-requirement(s) were not tested or not applicable

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:		Alibaba Cloud CDN and DCDN		
PCI DSS Requirement	Details of Requirements Assessed			Justification for Approach (Required for all “Partial” and “None” responses. Identify which sub-requirements were not tested and the reason.)
	Full	Partial	None	
Requirement 1:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Requirement 1.2.3 was marked as not applicable. Because wireless networks are not enabled in the scope of this PCI DSS assessment Requirement 1.3.6 was marked as not applicable. Because cardholder data are not stored in database server of the cardholder data environment.
Requirement 2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Requirement 2.1.1 was marked as not applicable. Because wireless networks are not enabled in the scope of this PCI DSS assessment Requirement 2.6 was marked as not applicable. Because Alibaba Cloud CDN service is not a shared hosting service for its clients in this PCI DSS assessment.
Requirement 3:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Requirements 3.1, 3.4, 3.5, 3.5.1, 3.5.2, 3.5.3, 3.5.4, 3.6, 3.6.1, 3.6.2, 3.6.3, 3.6.4, 3.6.5, 3.6.6, 3.6.7 and 3.6.8 were marked as not applicable. Because cardholder data and sensitive authentication data are not stored in the cardholder data environment. Requirements 3.3 was marked as not applicable. Because PANs are not visible to Alibaba Cloud internal person. Requirements 3.4.1 was marked as not applicable. Because disk level encryption mechanisms are not engaged for the cardholder data protection.
Requirement 4:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Requirement 4.1.1 was marked as not applicable. Because wireless networks are not enabled in the scope of this PCI DSS assessment

				Requirement 4.2 was marked as not applicable. Because PANs are not transmitted via end-user messaging technologies.
Requirement 5:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All requirements in this section were marked as applicable.
Requirement 6:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Requirement 6.4.3 was marked as not applicable. Because PANs are not required for testing procedure.
Requirement 7:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All requirements in this section were marked as applicable.
Requirement 8:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Requirement 8.1.5 was marked as not applicable. Because vendor accounts are not enabled in the cardholder data environment. Requirement 8.7 was marked as not applicable. Because cardholder data are not stored in database servers.
Requirement 9:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Requirements 9.5, 9.5.1, 9.6, 9.6.1, 9.6.2, 9.6.3, 9.7, 9.7.1, 9.8, 9.8.1 and 9.8.2 were marked as not applicable. Because media is not engaged in the storage of cardholder data. Requirements 9.9, 9.9.1, 9.9.2 and 9.9.3 were marked as not applicable. Because card-present services are not supported in the Alibaba Cloud CDN and DCDN infrastructure network environment.
Requirement 10:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Requirements 10.2.1 was marked as not applicable. Because cardholder data are neither stored in the CDE nor accessible in operational and administrative process.
Requirement 11:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Requirement 11.1.1 was marked as not applicable. Because wireless networks are not enabled in the scope of this PCI DSS assessment.
Requirement 12:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Requirement 12.3.9 was marked as not applicable. Because vendor accounts are not enabled in the infrastructure network environment of Alibaba Cloud CDN and DCDN services. Requirement 12.8.5 was marked as not applicable. Because PCI DSS requirements are not managed by external entities.
Appendix A1:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	All requirements were marked as not applicable. Because Alibaba Cloud CDN and DCDN services are not a shared hosting service for its clients in this PCI DSS assessment.
Appendix A2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Requirement A2.1 was marked as not applicable. Because POS POI terminals are not enabled in the cardholder data environment.

Section 2: Report on Compliance

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

The assessment documented in this attestation and in the ROC was completed on:	September 10, 2020
Have compensating controls been used to meet any requirement in the ROC?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any requirements in the ROC identified as being not applicable (N/A)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any requirements not tested?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were any requirements in the ROC unable to be met due to a legal constraint?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Section 3: Validation and Attestation Details

Part 3. PCI DSS Validation

This AOC is based on results noted in the ROC dated *September 10, 2020*.

Based on the results documented in the ROC noted above, the signatories identified in Parts 3b-3d, as applicable, assert(s) the following compliance status for the entity identified in Part 2 of this document (**check one**):

<input checked="" type="checkbox"/>	<p>Compliant: All sections of the PCI DSS ROC are complete, all questions answered affirmatively, resulting in an overall COMPLIANT rating; thereby <i>Alibaba Cloud (Singapore) Private Limited</i> has demonstrated full compliance with the PCI DSS.</p>						
<input type="checkbox"/>	<p>Non-Compliant: Not all sections of the PCI DSS ROC are complete, or not all questions are answered affirmatively, resulting in an overall NON-COMPLIANT rating, thereby <i>Alibaba Cloud (Singapore) Private Limited</i> has not demonstrated full compliance with the PCI DSS.</p> <p>Target Date for Compliance:</p> <p>An entity submitting this form with a status of Non-Compliant may be required to complete the Action Plan in Part 4 of this document. <i>Check with the payment brand(s) before completing Part 4.</i></p>						
<input type="checkbox"/>	<p>Compliant but with Legal exception: One or more requirements are marked "Not in Place" due to a legal restriction that prevents the requirement from being met. This option requires additional review from acquirer or payment brand.</p> <p><i>If checked, complete the following:</i></p> <table border="1"> <thead> <tr> <th>Affected Requirement</th> <th>Details of how legal constraint prevents requirement being met</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Affected Requirement	Details of how legal constraint prevents requirement being met				
Affected Requirement	Details of how legal constraint prevents requirement being met						

Part 3a. Acknowledgement of Status

Signatory(s) confirms:

(Check all that apply)

<input checked="" type="checkbox"/>	The ROC was completed according to the <i>PCI DSS Requirements and Security Assessment Procedures</i> , Version 3.2.1, 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 my assessment in all material respects.
<input checked="" type="checkbox"/>	I have confirmed with my payment application vendor that my payment system does not store sensitive authentication data after authorization.
<input checked="" type="checkbox"/>	I have read the PCI DSS and I recognize that I must maintain PCI DSS compliance, as applicable to my environment, at all times.
<input checked="" type="checkbox"/>	If my environment changes, I recognize I must reassess my environment and implement any additional PCI DSS requirements that apply.

Part 3a. Acknowledgement of Status (continued)

<input checked="" type="checkbox"/>	No evidence of full track data ¹ , CAV2, CVC2, CID, or CVV2 data ² , or PIN data ³ storage after transaction authorization was found on ANY system reviewed during this assessment.
<input checked="" type="checkbox"/>	ASV scans are being completed by the PCI SSC Approved Scanning Vendor <i>atsec (Beijing) Information Technology Co., Ltd</i>

Part 3b. Service Provider Attestation



Signature of Service Provider Executive Officer ↑	Date: September 10, 2020
Service Provider Executive Officer Name: Irene Wang	Title: Senior Security Compliance Manager

Part 3c. Qualified Security Assessor (QSA) Acknowledgement (if applicable)

If a QSA was involved or assisted with this assessment, describe the role performed:	QSA assessment and evidence validation.
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Signature of Duly Authorized Officer of QSA Company ↑	Date: September 10, 2020
Duly Authorized Officer Name: Jinyun Chen (陈谨运)	QSA Company: <i>atsec (Beijing) Information Technology Co., Ltd</i>

Part 3d. Internal Security Assessor (ISA) Involvement (if applicable)

If an ISA(s) was involved or assisted with this assessment, identify the ISA personnel and describe the role performed:	Not applicable. Because ISA is not involved in this PCI DSS assessment.
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¹ Data encoded in the magnetic stripe or equivalent data on a chip used for authorization during a card-present transaction. Entities may not retain full track data after transaction authorization. The only elements of track data that may be retained are primary account number (PAN), expiration date, and cardholder name.

² The three- or four-digit value printed by the signature panel or on the face of a payment card used to verify card-not-present transactions.

³ Personal identification number entered by cardholder during a card-present transaction, and/or encrypted PIN block present within the transaction message.

Part 4. Action Plan for Non-Compliant Requirements

Select the appropriate response for “Compliant to PCI DSS Requirements” for each requirement. If you answer “No” to any of the requirements, you may be required to provide the date your Company expects to be compliant with the requirement and a brief description of the actions being taken to meet the requirement.

Check with the applicable payment brand(s) before completing Part 4.

PCI 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 a firewall configuration to protect cardholder data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2	Do not use vendor-supplied defaults for system passwords and other security parameters	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3	Protect stored cardholder data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4	Encrypt transmission of cardholder data across open, public networks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5	Protect all systems against malware and regularly update anti-virus software or programs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6	Develop and maintain secure systems and applications	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7	Restrict access to cardholder data by business need to know	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8	Identify 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	Track and monitor all access to network resources and cardholder data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11	Regularly test security systems and processes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
12	Maintain a policy that addresses information security for all personnel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Appendix A1	Additional PCI DSS Requirements for Shared Hosting 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"/>	

