

# 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: Arbor Education Partners Limited** 

Date of Report as noted in the Report on Compliance: 15/08/2025

Date Assessment Ended: 07/08/2025



### **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:	Arbor Education Partners Limited
DBA (doing business as):	Arbor Education
Company mailing address:	Floor 4, FORA, 21-33 Great Eastern Street, London, EC2A 3EJ
Company main website:	www.arbor-education.com
Company contact name:	Damian Brooks
Company contact title:	СТО
Contact phone number:	+44(0) 7754 746 408
Contact e-mail address:	Damian.brooks@arbor-education.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:	Cyber Security Associates Limited		
Company mailing address:	Unit 11, Wheatstone Court, Waterwells Business Park, Gloucester, Gloucestershire. GL2 2AQ		
Company website:	www.csacyber.com		
Lead Assessor name:	James Cullen		
Assessor phone number:	+44 (0) 7591 338 506		
Assessor e-mail address:	James.cullen@csacyber.com		
Assessor certificate number:	206-561		



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:	Arbor Education Management Infomi	Arbor Education Management Infomration System (MIS)			
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):					
<b>Note:</b> 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 ☐ MOTO / Call Center ☐ Infrastructure / Network ☐ Physical security ☐ Physical space (co-location) ☐ Terminal Management System ATM ☐ Other processing (specify): ☐ Storage ☐ Other services (specify): ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Other Hosting (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 ☐ Tax/Government Payments □ Network Provider ☐ Others (specify): Provide a brief explanation why any checked services were not included in the Assessment: Part 2b. Description of Role with Payment Cards (ROC Sections 2.1 and 3.1) Describe how the business stores, processes, and/or Arbor Education provides a Management Information transmits account data. System (MIS) to education organisations for the purposes of payroll, paying for meals and communication with parents and guardians. The MIS system allows schools to take payments directly from parents and guardians for services such as school meals, uniforms, school trips and after-school clubs. Arbor Education does not directly store, process or trnasmit the Account data directly but relies upon the functionality of Stripe.



Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.	All payments are fully outsourced and are processed via Stripe. Account Data Is entered directly into an iFrame provided by Stripe.  At no point in the transaction process does Arbor Education store, process, or transmit Account Data but they do have the ability to affect the security of the Card Data Environment (iframe) due to the development of the code that supoprts the iframe.
Describe system components that could impact the security of account data.	Arbor rely fully on outsourced payment processing by Stripe which is served directly to the customer browser. Although no responsibility for the processing they can affect the security of the processing due to the management of the code that served the parent page and the access to the virtual private cloud that the website is hosted in.



### Part 2. Executive Summary (continued)

#### Part 2c. Description of Payment Card Environment

Provide a high-level description of the environment covered by this Assessment.

#### For example:

- Connections into and out of the cardholder data environment (CDE).
- Critical system components within the CDE, such as POI devices, databases, web servers, etc., and any other necessary payment components, as applicable.
- System components that could impact the security of account data.

The Arbor platform is hosted within a private cloud provided by AWS. Within the platform Arbor take payments through Stripe in the form of a hosted Iframe. The hosted iframe is served directly to the customer browser where the Account Data is entered. The storage, processing and transmission of the card data is handled fully by Stripe.

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
Head Office	1	London, UK

Page 5



Products and Solutions:

### Part 2. Executive Summary (continued)

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

Does the entity use any item identified on any PCI SSC Lists of Validated Products and Solutions.*?
☐ Yes ⊠ No
Provide the following information regarding each item the entity uses from PCI SSC's Lists of Validated

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

<sup>\*</sup> 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 2. Executive Summary (continued)

### 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   Yes   No  No  No  No  No  No  No  No  No  N					
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:				
AWS	Hosting provider				
Stripe Payment processor					

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



### Part 2. Executive Summary (continued)

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

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

For all requirements identified as either "Not Applicable" or "Not Tested," complete the "Justification for Approach" table below.

**Note:** One table to be completed for each service covered by this AOC. Additional copies of this section are available on the PCI SSC website.

Name of Service Assessed: Arbor Education Management Infomration System (MIS)

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:					
Requirement 2:		$\boxtimes$			
Requirement 3:		$\boxtimes$			
Requirement 4:		$\boxtimes$			
Requirement 5:		$\boxtimes$			
Requirement 6:	$\boxtimes$				
Requirement 7:		$\boxtimes$			
Requirement 8:	$\boxtimes$	$\boxtimes$			
Requirement 9:		$\boxtimes$			
Requirement 10:		$\boxtimes$			
Requirement 11:		$\boxtimes$			
Requirement 12:	$\boxtimes$	$\boxtimes$			
Appendix A1:		$\boxtimes$			
Appendix A2:		$\boxtimes$			
Justification for Approach					



	1.1-1.2.3, 1.2.5 – 1.5.1
	2.2 - 2.2.1, 2.2.3 - 2.3.2
	All of requirement 3
	All of requirement 4
	All of requirement 5
	6.2 - 6.2.4, 6.3.2, 6.4 - 6.4.2, 6.5 - 6.5.6,
	All requirement 7,
	8.2.3, 8.2.4, 8.2.6-8.2.8, 8.3.2-8.3.4, 8.3.8, 8.3.10- 8.4.6.3
	All of requirement 9 (minus 9.1.1)
For any Not Applicable responses, identify which sub-	10.1.2-10.7.1,
requirements were not applicable and the reason.	11.1.2 – 11.3.1.3, 11.4 – 11.6.1,
	12.2.1-12.3.4, 12.5.1, 12.6.1 – 12.7.1, 12.10.2- 12.10.7
	Appendix A1, A2, A3. Due to the nature of the processes performed entirely by Stripe the above requirements are all the responsibility of third part services provders. Requirement 9 - No hard copy electronic media containing Acocunt Data. No PO devices.
	Appendix A1, A2 - not a multi tenant service provide and does not use SSL/Early TLS for Card-Present POS POI Terminal Connections.
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:	2025-07-18
<b>Note:</b> This is the first date that evidence was gathered, or observations were made.	
Date Assessment ended:	2025-08-15
<b>Note:</b> This is the last date that evidence was gathered, or observations were made.	
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)

•	in the ROC dated (Date of Report as noted in the ROC 2025-08-15).				
•	PCI DSS assessment was completed:				
as Not Tested in the ROC.	s have been assessed and therefore no requirements were marked				
	e requirements have not been assessed and were therefore marked irement not assessed is noted as Not Tested in Part 2g above.				
	e ROC noted above, each signatory identified in any of Parts 3b-3d, ompliance status for the entity identified in Part 2 of this document				
marked as being either In Place Arbor Education Partners Limited h	<b>Compliant:</b> 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 <b>COMPLIANT</b> rating; thereby Arbor Education Partners Limited has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above.				
marked as Not in Place, resulting	<b>Non-Compliant:</b> 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 <b>NON-COMPLIANT</b> rating; thereby ( <i>Service Provider Company Name</i> ) has not demonstrated compliance with PCI DSS requirements.				
Target Date for Compliance: YY	YY-MM-DD				
	h a Non-Compliant status may be required to complete the Action Confirm with the entity to which this AOC will be submitted before				
as Not in Place due to a legal res assessed requirements are mark	ption: One or more assessed requirements in the ROC are marked striction that prevents the requirement from being met and all other sed as being either In Place or Not Applicable, resulting in an overall LEXCEPTION rating; thereby (Service Provider Company Name) has II PCI DSS requirements except those noted as Not Tested above or striction.				
demonstrated compliance with all as Not in Place due to a legal res	eview from the entity to which this AOC will be submitted.				
as Not in Place due to a legal res	whom from the critical to which the first will be capitalled.				
as Not in Place due to a legal res					
as Not in Place due to a legal res This option requires additional re					
demonstrated compliance with a	striction.				



### Part 3. PCI DSS Validation (continued) Part 3a. Service Provider Acknowledgement Signatory(s) confirms: (Select all that apply) The ROC was completed according to PCI DSS, Version 4.0.1 and was completed according to the instructions therein. $\bowtie$ All information within the above-referenced ROC and in this attestation fairly represents the results of the Assessment in all material respects. PCI DSS controls will be maintained at all times, as applicable to the entity's environment. $\boxtimes$ Part 3b. Service Provider Attestation Danian Brooks Damian Brooks (Aug 15, 2025, 4:38pm) 15 Aug 2025 Signature of Service Provider Executive Officer 1 Date: Service Provider Executive Officer Name Damian Brooks CTO Title: Part 3c. Qualified Security Assessor (QSA) Acknowledgement If a 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: Evidence collection, report writing and QA JS Culler James Cullen (Aug 15, 2025, 4:27pm) 15 Aug 2025 Signature of Lead QSA 1 Date: Lead QSA Name: James Cullen JS Colles James Cullen (Aug 15, 2025, 4:27pm) 15 Aug 2025 Signature of Duly Authorized Officer of QSA Company 1 Date: Duly Authorized Officer Name: James Cullen QSA Company: Cyber Security Associates limited Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement If an ISA(s) was involved or assisted with this ☐ ISA(s) performed testing procedures. Assessment, indicate the role performed: ☐ ISA(s) provided other assistance. If selected, describe all role(s) performed:



### Part 4. Action Plan for Non-Compliant Requirements

Only complete Part 4 upon request of the entity to which this AOC will be submitted, and only if the Assessment has Non-Compliant results noted in Section 3.

If asked to complete this section, select the appropriate response for "Compliant to PCI DSS Requirements" for each requirement below. For any "No" responses, include the date the entity expects to be compliant with the requirement and provide a brief description of the actions being taken to meet the requirement.

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

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: <a href="https://www.pcisecuritystandards.org/about\_us/">https://www.pcisecuritystandards.org/about\_us/</a>



Issuer Cyber Security Associates Limited

**Document generated** Fri, 15th Aug 2025 16:25:19 BST

**Document fingerprint** 6c378538d049439471dffd3c78d1c036

#### Parties involved with this document

Fri, 15th Aug 2025 16:38:58 BST

**Document processed** 

Fri, 15th Aug 2025 16:27:28 BST	James Cullen - Signer (d4733e3d018279ee5fcf263f60f8cdb2)
Fri, 15th Aug 2025 16:38:58 BST	Damian Brooks - Signer (6bcaec8c9047cb201d83a7a23fc01c1e)
Audit history log	
Data	Action
Date	Action
Fri, 15th Aug 2025 16:25:19 BST	Envelope generated by James Cullen (82.34.7.211)
Fri, 15th Aug 2025 16:25:19 BST	Document generated with fingerprint
	6c378538d049439471dffd3c78d1c036 (82.34.7.211)
Fri, 15th Aug 2025 16:25:19 BST	Document generated with fingerprint 47acc9a4de00d1d85d1aef06fd31c2f5
	(82.34.7.211)
Fri, 15th Aug 2025 16:27:04 BST	Sent the envelope to James Cullen (james.cullen@csacyber.com) for
	signing (82.34.7.211)
Fri, 15th Aug 2025 16:27:07 BST	Document emailed to james.cullen@csacyber.com
Fri, 15th Aug 2025 16:27:09 BST	James Cullen viewed the envelope (82.34.7.211)
Fri, 15th Aug 2025 16:27:28 BST	James Cullen signed the envelope (82.34.7.211)
Fri, 15th Aug 2025 16:27:28 BST	Sent the envelope to Damian Brooks
	(damian.brooks@arbor-education.com) for signing (82.34.7.211)
Fri, 15th Aug 2025 16:27:30 BST	Document emailed to damian.brooks@arbor-education.com
Fri, 15th Aug 2025 16:27:33 BST	James Cullen opened the document email. (85.210.240.71)
Fri, 15th Aug 2025 16:37:11 BST	Damian Brooks viewed the envelope (86.153.175.203)
Fri, 15th Aug 2025 16:37:19 BST	Damian Brooks viewed the envelope (62.252.115.135)
Fri, 15th Aug 2025 16:38:58 BST	Damian Brooks signed the envelope (86.153.175.203)

This envelope has been signed by all parties (86.153.175.203)

Party + Fingerprint