



# **Payment Card Industry Data Security Standard**

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## **Attestation of Compliance for Report on Compliance – Service Providers**

**Version 4.0**

Revision 2

Publication Date: August 2023

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

**Entity Name: Yandex, LLC**

**Assessment End Date: September 21, 2023**

**Date of Report as noted in the Report on Compliance: September 28, 2023**

## 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:	Yandex, LLC
DBA (doing business as):	Yandex DC
Company mailing address:	Lva Tolstogo str. 16, Moscow, 119021, Russia
Company main website:	yandex.ru
Company contact name:	Dmitriy Kudinov
Company contact title:	Head of compliance direction
Contact phone number:	+7 (965) 358-43-42
Contact e-mail address:	dimonk099@yandex-team.ru

#### 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:	Deiteriy Co. Ltd.
Company mailing address:	pr. Obukhovskoy Oborony 271A, Saint Petersburg, 192012, Russia
Company website:	deiteriy.com
Lead Assessor name:	Victoria Gadalova
Assessor phone number:	+7 (812) 361-61-55
Assessor e-mail address:	victoria.gadalova@deiteriy.com
Assessor certificate number:	205-900

## 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:

Hardware hosting in the data center

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): N/A

**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:

- E-commerce payment gateway;
- Tokenization service.

Type of service(s) not 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):

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Account Management                                 | <input type="checkbox"/> Fraud and Chargeback | <input checked="" 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 checked="" type="checkbox"/> Clearing and Settlement                 | <input type="checkbox"/> Merchant Services    | <input type="checkbox"/> Tax/Government Payments           |
| <input type="checkbox"/> Network Provider                                   |   |  |
| <input checked="" type="checkbox"/> Others (specify): Tokenization service. |   |  |

Provide a brief explanation why any checked services were not included in the Assessment:

E-commerce payment gateway and tokenization services were reviewed in the scope of another assessment. That assessment was described in another AOC.

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

Describe how the business stores, processes, and/or transmits account data.

The Company does not store, process, and/or transmit account data directly in the scope of co-location business process under review.

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

The Company provides data center physical space for co-location of equipment of another Company's services of Yandex group, involved in cardholder data processing.

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

The Company provides only data center physical space, so system components are:

- access control system;
- video surveillance system.

## 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.*

Physical space in four data centers for co-location of equipment, involved in cardholder data processing.

The Company controls entities, which provide different services, such as Yandex.Cloud LLC, Yandex Music LLC and other Yandex entities.

The Company's responsibility is the physical security of client's equipment. Physical access to the client's equipment is restricted to authorized personnel.

The Company does not store, process, and/or transmit cardholder data directly in the scope of co-location business process under review.

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)
<i>Example: Data centers</i>	3	<i>Boston, MA, USA</i>
Data centers	5	Ivanteevka, Moscow region, Russia Kaluga, Russia (include Yandex.Cloud availability zone) Mytishchi, Moscow region, Russia (include Yandex.Cloud availability zone) Sasovo, Ryazan region, Russia (include Yandex.Cloud availability zone) Vladimir, Russia (include Yandex.Cloud availability zone)

## 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 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
N/A	N/A	N/A	N/A	N/A

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\* 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](http://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.



**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:

<ul style="list-style-type: none"> <li>• 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))</li> </ul>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> <li>• 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)</li> </ul>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<ul style="list-style-type: none"> <li>• Could impact the security of the entity's CDE (for example, vendors providing support via remote access, and/or bespoke software developers).</li> </ul>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**If Yes:**

Name of Service Provider:	Description of Services Provided:
N/A	N/A

**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: *Hardware hosting in the data center*

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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 2:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 3:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 4:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 5:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 6:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 7:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 8:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 11:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 12:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" 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"/>

#### Justification for Approach

For any Not Applicable responses, identify which sub-requirements were not applicable and the reason.

9.4.6 – N/A, hard-copy materials, containing CHD are not used in the scope of the assessment.

9.5 – 9.5.1.3, Appendix A2 – N/A, there are no any devices that capture payment card data via direct

	<p>physical interaction with the card in the scope of assessment.</p> <p>12.2 – 12.2.1 – N/A, the Company does not implement any end-user technologies in the scope of the assessment.</p> <p>12.3.2 – N/A, the Company does not use customized approach in the scope of the assessment.</p> <p>Appendix A1 – N/A, the Company is not a Multi-Tenant service provider.</p>
<p>For any Not Tested responses, identify which sub-requirements were not tested and the reason.</p>	<p>1.1 – 8.6.3, 10.1 – 10.7.3, 11.3 – 11.6.1, 12.3.3 – Not tested due to scope of assessment limitation</p>

## 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>		September 21, 2023
Date Assessment ended: <i>Note: This is the last date that evidence was gathered, or observations were made.</i>		September 28, 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No
• Examine documentation	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
• Interview personnel	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
• Examine/observe live data	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
• Observe process being performed	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
• Observe physical environment	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
• Interactive testing	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
• Other:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

## 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 September 28, 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><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 Yandex, LLC has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above.</p>				
<input type="checkbox"/>	<p><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 N/A has not demonstrated compliance with PCI DSS requirements.</p> <p><b>Target Date</b> for Compliance: N/A</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><b>Compliant but with Legal exception:</b> 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 <b>COMPLIANT BUT WITH LEGAL EXCEPTION</b> rating; thereby N/A 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> <th style="width: 35%;">Affected Requirement</th> <th style="width: 65%;">Details of how legal constraint prevents requirement from being met</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">N/A</td> <td style="text-align: center;">N/A</td> </tr> </tbody> </table>	Affected Requirement	Details of how legal constraint prevents requirement from being met	N/A	N/A
Affected Requirement	Details of how legal constraint prevents requirement from being met				
N/A	N/A				

### Part 3. PCI DSS Validation *(continued)*

#### 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



Signature of Service Provider Executive Officer ↑	Date: September 28, 2023
Service Provider Executive Officer Name: Dmitriy Kudinov	Title: Head of compliance direction

#### 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: N/A



Signature of Lead QSA ↑	Date: September 28, 2023
Lead QSA Name: Victoria Gadalova	



Signature of Duly Authorized Officer of QSA Company ↑	Date: September 28, 2023
Duly Authorized Officer Name: Sergey Shustikov	QSA Company: Deiteriy Co. Ltd.

#### 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: N/A

## 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"/>	

