



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: Airship Services Ltd

Date of Report as noted in the Report on Compliance: 16th March 2026

Date Assessment Ended: 13th March 2026

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:	Airship Services Ltd
DBA (doing business as):	Airship Services Ltd
Company mailing address:	16 South Street, Park Hill, Sheffield, S2 5QX, United Kingdom.
Company main website:	https://airship.co.uk
Company contact name:	Oskar Smith
Company contact title:	Chief Technical Officer
Contact phone number:	+44 7780 704 261
Contact e-mail address:	oskar.smith@airship.co.uk

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:	Claranet Ltd
Company mailing address:	110 High Holborn, London WC1V 6JS, United Kingdom
Company website:	https://www.claranet.com/uk
Lead Assessor name:	Anselmo Diaz Valiente
Assessor phone number:	+44 1924 284 240
Assessor e-mail address:	anselmo.d.valiente@claranet.com
Assessor certificate number:	205-960

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:

Toggle e-commerce platform

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):

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:

- 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):

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 transmits account data.

Not Applicable

Airship does not provide services that store, process or transmit account data

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

Airship provides an e-commerce platform that allows customers to implement and manage websites which use iframe technology to process payments, with the customer using their own merchant ID and also determining the iframe provider. Account data will flow from the cardholders' browser directly to the iframe provider.

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

The in-scope systems, that, if compromised, could result in an attacker being able to impact on the security of account data are:

- CDN77, Content Delivery Network
- DeployHQ, deployment automation platform
- AWS, Cloud Service Provider, hosting Linux servers (web servers)
- Zoho Vault, password manager
- Laravel Vapor, serverless deployment platform that uses AWS Lambda
- GitHub, code repository

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.*

Airship has the potential to impact on the security of CHD, as they manage the web servers, and related system components, that could potentially be used to manipulate the pages that serve the payment iframe. Payments are typically taken from the cardholder to pay for products and services provided by the Airship client. The payment processors that the Toggle framework is integrated with are:

- Trust Payments
- Stripe
- PayPal
- Global Payments
- FreedomPay
- Braintree
- Adyen

In all scenarios, the Airship client will be the merchant. The e-commerce platform is hosted in AWS, on EC2 Linux based web servers. Other systems that Airship uses to manage the Toggle websites, which are in-scope for this assessment as, if compromised, it could lead the attacker being able to impact on the security of account data are:

- CDN77
- DeployHQ
- AWS
- Zoho Vault
- Laravel Vapor
- GitHub

This service provider assessment was against the requirements the QSAC has determined, based on their own risk assessment, to be applicable when iframe technology is used to process payments. The risk assessment approach is documented in a 'white paper' and cross references the QSAC's determination of threats and vulnerabilities when iframe technology is used against the requirement rankings from the 'prioritized approach', and the requirements from SAQ A, to determine which requirements are applicable.

Indicate whether the environment includes segmentation to reduce the scope of the Assessment.

(Refer to the "Segmentation" section of PCI DSS for guidance on segmentation)

Yes No

**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>
Not Applicable	Not Applicable	Not Applicable

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
				YYYY-MM-DD
				YYYY-MM-DD
				YYYY-MM-DD
				YYYY-MM-DD
				YYYY-MM-DD
				YYYY-MM-DD

* 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:

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

If Yes:

Name of Service Provider:	Description of Services Provided:
Not Applicable	Not Applicable

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: Toggle

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 Used
	In Place	Not Applicable	Not Tested	Not in Place	
Requirement 1:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 2:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 3:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 4:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 5:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 6:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 7:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 8:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 9:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 10:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 11:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Requirement 12:	<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"/>
Appendix A2:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Justification for Approach

<p>For any Not Applicable responses, identify which sub-requirements were not applicable and the reason.</p>	<p>The risk assessment undertaken by the QSAC determined that all requirements are Not Applicable apart from: 1.2.1, 1.2.3, 1.2.4, 1.2.5, 2.2.1, 2.2.2, 2.2.3, 2.2.4, 2.2.6, 6.2.1, 6.2.2, 6.2.4, 6.3.1, 6.3.3, 8.2.1, 8.2.2, 8.2.5, 8.3.1, 8.3.2, 8.3.5, 8.3.6, 8.3.7, 11.3.2, 12.4.1, 12.6.1, 12.8.3, 12.9.1, 12.9.2, 12.10.1</p> <p>the following requirements were ascertained as being in-scope via the risk assessment but were determined as Not Applicable for the reasons described below:</p> <p>2.2.5: there are no insecure services, protocols or daemons in use</p> <p>3.1.1, 3.2.1, 9.4.1, 9.4.2, 9.4.3, 9.4.4, 9.4.6: Airship does not store account data, either electronically or on paper media.</p> <p>5.2.1, 5.2.2, 5.3.1, 5.3.2, 5.3.5: Linux servers are used, and Airship has determined Anti-Malware is currently not required.</p> <p>12.3.1: no requirements need the completion of a TRA.</p> <p>8.3.9: MFA is in use across all in-scope systems.</p> <p>11.3.2.1: there have been no significant changes that have resulted in a scan needing to be run.</p> <p>12.8.1, 12.8.2, 12.8.4, 12.8.5: there are no service providers that are meeting requirements on behalf of Airship.</p>
<p>For any Not Tested responses, identify which sub-requirements were not tested and the reason.</p>	<p>Not Applicable</p>

Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3)

Date Assessment began: <i>Note: This is the first date that evidence was gathered, or observations were made.</i>	9th February 2026
Date Assessment ended: <i>Note: This is the last date that evidence was gathered, or observations were made.</i>	13th March 2026
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?	<input checked="" type="checkbox"/> Yes <input 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 *(Date of Report as noted in the ROC 2026-03-16)*.

Indicate below whether a full or partial PCI DSS assessment was completed:

- Full Assessment** – All requirements have been assessed and therefore no requirements were marked as Not Tested in the ROC.
- Partial Assessment** – One or more requirements have not been assessed and were therefore marked as Not Tested in the ROC. Any requirement not assessed is noted as Not Tested in Part 2g above.

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

<input checked="" type="checkbox"/>	<p>Compliant: All sections of the PCI DSS ROC are complete, and all assessed requirements are marked as being either In Place or Not Applicable, resulting in an overall COMPLIANT rating; thereby Airship Services Ltd has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above.</p>								
<input type="checkbox"/>	<p>Non-Compliant: Not all sections of the PCI DSS ROC are complete, or one or more requirements are marked as Not in Place, resulting in an overall NON-COMPLIANT rating; thereby <i>(Service Provider Company Name)</i> has not demonstrated compliance with PCI DSS requirements.</p> <p>Target Date for Compliance: YYYY-MM-DD</p> <p>An entity submitting this form with a Non-Compliant status may be required to complete the Action Plan in Part 4 of this document. Confirm with the entity to which this AOC will be submitted before completing Part 4.</p>								
<input type="checkbox"/>	<p>Compliant but with Legal exception: One or more assessed requirements in the ROC are marked as Not in Place due to a legal restriction that prevents the requirement from being met and all other assessed requirements are marked as being either In Place or Not Applicable, resulting in an overall COMPLIANT BUT WITH LEGAL EXCEPTION rating; thereby <i>(Service Provider Company Name)</i> has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above or as Not in Place due to a legal restriction.</p> <p>This option requires additional review from the entity to which this AOC will be submitted.</p> <p><i>If selected, complete the following:</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 35%;">Affected Requirement</th> <th>Details of how legal constraint prevents requirement from being met</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Affected Requirement	Details of how legal constraint prevents requirement from being met						
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)

<input checked="" type="checkbox"/>	The ROC was completed according to <i>PCI DSS</i> , Version 4.0.1 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 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

	Date: 2026-03-30
Signature of Service Provider Executive Officer ↑	
Service Provider Executive Officer Name: Oskar Smith	Title: Chief Technical Officer

Part 3c. Qualified Security Assessor (QSA) Acknowledgement

If a QSA was involved or assisted with this Assessment, indicate the role performed:	<input checked="" type="checkbox"/> QSA performed testing procedures.
	<input type="checkbox"/> QSA provided other assistance. If selected, describe all role(s) performed:

<u>Anselmo Diaz Valiente</u> <small>Anselmo Diaz Valiente (Mar 31, 2026 09:17:10 GMT+1)</small>	Date: 2026-03-31
Signature of Lead QSA ↑	
Lead QSA Name: Anselmo Diaz Valiente	

	Date: 2026-03-31
Signature of Duly Authorized Officer of QSA Company ↑	
Duly Authorized Officer Name: Stuart Pilkington	QSA Company: Claranet 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:	<input type="checkbox"/> ISA(s) performed testing procedures.
	<input type="checkbox"/> 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 Requirement)
		YES	NO	
1	Install and maintain network security controls	<input type="checkbox"/>	<input type="checkbox"/>	
2	Apply secure configurations to all system components	<input type="checkbox"/>	<input type="checkbox"/>	
3	Protect stored account data	<input type="checkbox"/>	<input type="checkbox"/>	
4	Protect cardholder data with strong cryptography during transmission over open, public networks	<input type="checkbox"/>	<input type="checkbox"/>	
5	Protect all systems and networks from malicious software	<input type="checkbox"/>	<input type="checkbox"/>	
6	Develop and maintain secure systems and software	<input type="checkbox"/>	<input type="checkbox"/>	
7	Restrict access to system components and cardholder data by business need to know	<input type="checkbox"/>	<input type="checkbox"/>	
8	Identify users and authenticate access to system components	<input type="checkbox"/>	<input type="checkbox"/>	
9	Restrict physical access to cardholder data	<input type="checkbox"/>	<input type="checkbox"/>	
10	Log and monitor all access to system components and cardholder data	<input type="checkbox"/>	<input type="checkbox"/>	
11	Test security systems and networks regularly	<input type="checkbox"/>	<input type="checkbox"/>	
12	Support information security with organizational policies and programs	<input type="checkbox"/>	<input type="checkbox"/>	
Appendix A1	Additional PCI DSS Requirements for Multi-Tenant Service Providers	<input type="checkbox"/>	<input type="checkbox"/>	
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections	<input type="checkbox"/>	<input type="checkbox"/>	

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/