



Payment Card Industry Data Security Standard

Attestation of Compliance for Report on Compliance – Merchants

Version 4.0

Revision 1

Publication Date: December 2022

PCI DSS v4.0 Attestation of Compliance for Report on Compliance - Merchants

Entity Name: Semrush, Inc.

Assessment End Date: May 9, 2024

Date of Report as noted in the Report on Compliance: May 30, 2024

Section 1 Assessment Information

Instructions for Submission

This Attestation of Compliance (AOC) must be completed as a declaration of the results of the merchant's assessment against the *Payment Card Industry Data Security Standard (PCI DSS) Requirements and Testing Procedures* ("Assessment"). Complete all sections. The merchant 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:	Semrush, Inc.
DBA (doing business as):	Semrush Semrush CZ S.R.O Semrush B.V. Semrush CY Ltd. Semrush Canada
Company mailing address:	800 Boylston Street, Suite 2475 Boston, MA 02199
Company main website:	https://semrush.com
Company contact name:	Fedor Moshkov
Company contact title:	Security Compliance Lead
Contact phone number:	(888) 553-1467
Contact e-mail address:	f.moshkov@semrush.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:	CompliancePoint, Inc.
Company mailing address:	4400 River Green Parkway, Suite 100 Duluth, GA 30096
Company website:	https://www.compliancepoint.com/
Lead Assessor name:	Al Ubilla

Assessor phone number:	(770) 255-1100
Assessor e-mail address:	aubilla@compliancepoint.com
Assessor certificate number:	QSA - 205-166

Part 2. Executive Summary

Part 2a. Merchant Business Payment Channels (select all that apply): (ROC Section 2.1)

Indicate all payment channels used by the business that are included in this Assessment.

- ☐ Mail order / telephone order (MOTO)
☒ E-Commerce
☐ Card-present

Are any payment channels not included in this Assessment?
If yes, indicate which channel(s) is not included in the Assessment and provide a brief explanation about why the channel was excluded.

☐ Yes ☒ No

Not applicable

Note: If the merchant has a payment channel that is not covered by this Assessment, consult with the entity(ies) to which this AOC will be submitted about validation for the other channels.

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

For each payment channel included in this Assessment as selected in Part 2a above, describe how the business stores, processes, and/or transmits account data.

Channel	How Business Stores, Processes, and/or Transmits Account Data
E-Commerce	Semrush receives account data from its e-commerce website. The account data is sent to payment gateways for authorization. Semrush stores cardholder data elements (no CVV or other SAD values), within a secure database via encryption and secure hashing. All account data is rendered unreadable while in transit or at rest.

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.

Semrush captures cardholder data on their internally developed e-commerce site. The infrastructure is entirely hosted within GCP. Data is received via encrypted protocols (TLS 1.2 or TLS 1.3). Internally developed applications accept the cardholder data and transmit the data to payment processing entities for authorization. Once confirmation of payment authorization is received, the cardholder data is then securely stored within an access restricted database, and encrypted and hashed. The data is stored for

- System components that could impact the security of account data.

recurring transactions or to add additional services.

The environment is hosted within Google Cloud Platform (GCP). The development and testing of applications occurs in separate GCP environments. Core technologies include custom developed applications, GCP for platform hosting, hosted databases, and SaaS products.

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

Refer to "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, retail locations, 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: Retail locations</i>	3	<i>Boston, MA, USA</i>
Cloud-hosted environment	1	Google Cloud Platform (GCP)

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
Not Applicable				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, 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)

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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<ul style="list-style-type: none"> Manage system components included in the scope of the Assessment (for example, via network security control services, anti-malware services, security incident and event management (SIEM), contact and call centers, web-hosting services, and IaaS, PaaS, SaaS, and FaaS cloud providers) 	<input checked="" type="checkbox"/> Yes <input 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No

If Yes:

Name of Service Provider:	Description of Service(s) Provided:
Credorax Bank Ltd ("Finaro" and "Source Ltd")	CNP transaction processing
Stripe, Inc.	CNP transaction processing
Paymentech, LLC	CNP transaction processing
Adyen N.V.	CNP transaction processing
PayPal, Inc.'s Braintree Payment Processing System (Braintree)	CNP transaction processing
EBANX PTE LTD.	CNP transaction processing
GCP (Google Cloud Platform)	Cloud hosted platform including PaaS and SaaS
Trend Micro Canada Technologies, Inc.	Anti-malware, FIM, IDS/IPS solution
Amazon Web Services, Inc (AWS)	Cloud hosted platform dedicated for automated online data backups

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

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

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

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

Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3.2)

Date Assessment began: Note: This is the first date that evidence was gathered, or observations were made.		2024-03-11
Date Assessment ended: Note: This is the last date that evidence was gathered, or observations were made.		2024-05-09
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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No
• Examine documentation	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
• Interview personnel	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
• Examine/observe live data	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
• Observe process being performed	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
• Observe physical environment	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
• Interactive testing	<input checked="" type="checkbox"/> Yes	<input 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 *(Date of Report as noted in the ROC 2024-05-30)*.

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 Semrush, Inc. 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>(Merchant 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>(Merchant 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"> <thead> <tr> <th>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> </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 3a. Merchant 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. Merchant Attestation

DocuSigned by:
Oleg Shchegolev
FC4FF3D3002E48D...

Signature of Merchant Executive Officer ↑

Date:

Merchant Executive Officer Name: Oleg Shchegolev

Title: CEO

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:

DocuSigned by:
Al Ubilla
29E9FFA0248F4D9...

Signature of Lead QSA ↑

Date:

Lead QSA Name: Al Ubilla

DocuSigned by:
Brandon Breslin
331E36F3F96F48A...

Signature of Duly Authorized Officer of QSA Company ↑

Date:

Duly Authorized Officer Name: Brandon Breslin

QSA Company: CompliancePoint, Inc. - Associate Practice Director

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:

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 A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections	<input type="checkbox"/>	<input type="checkbox"/>	

