

# 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: Olo Inc.** 

Date of Report as noted in the Report on Compliance: 2/26/2025

Date Assessment Ended: 2/26/2025



### **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:	Olo Inc.		
DBA (doing business as):			
Company mailing address:	Olo Inc., One World Trade Center, 285 Fulton Street, 82nd floor, New York, NY 10007 USA		
Company main website:	www.olo.com		
Company contact name:	Nick Edmonds		
Company contact title:	CISO		
Contact phone number:	212-260-0895		
Contact e-mail address:	pci@olo.com		
Part 1b. Assessor			

### 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:	SecurityMetrics, Inc.		
Company mailing address:	1275 West, 1600 North Orem, UT 84057		
Company website:	www.securitymetrics.com		
Lead Assessor name:	Trevor Hansen		
Assessor phone number:	801-705-5694		
Assessor e-mail address:	aoc@securitymetrics.com		



	004 #000 005				
Assessor certificate number:	QSA #202-895				
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:	Olo Platform Engage (Wisely) Omnivore				
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):  Chat application	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: None Type of service(s) not assessed: **Hosting Provider: Payment Processing: Managed Services:** ☐ POI / card present ☐ Applications / software ☐ Systems security services ☐ Internet / e-commerce ☐ Hardware ☐ IT support ☐ MOTO / Call Center ☐ Infrastructure / Network ☐ Physical security ☐ Physical space (co-location) ☐ Terminal Management System ☐ ATM ☐ Storage Other services (specify): Other processing (specify): ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Multi-Tenant Service 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 ☐ Merchant Services ☐ Tax/Government Payments □ Network Provider Others (specify): Provide a brief explanation why any checked services N/A - No services were excluded were not included in the Assessment: Part 2b. Description of Role with Payment Cards (ROC Sections 2.1 and 3.1) Olo Inc. (referred to as Olo throughout this document) Describe how the business stores, processes, and/or transmits account data. provides mobile and web-based online ordering for restaurants. For online and mobile ordering, cardholder data is collected for payment and processed using Olo's processors. Credit card data can be collected when an account is opened and saved for future orders, or can be collected at the time of order. Olo uses tokenization solutions offered by its various processors to allow customers to save payment information for future purchases without storing cardholder data in the Olo cardholder environment.



Olo provides a service (referred to as Omnivore) that facilitates integration between different POS solutions and vendors. Restaurants can receive card-present transactions and integrate them among different technologies, facilitated by a public-facing API and an agent that runs on the POS system at the merchant location.

Olo also provides a service (referred to as Engage or Wisely) that allows restaurants to require a deposit for reservations or waitlisting. This payment data is also tokenized. If the restaurant's customer keeps the reservation, the payment card is not charged.

All cardholder data is received and transmitted over an HTTPS connection. Olo does not store PAN or sensitive cardholder data. Because of its transaction volume, Olo has been classified as a Level 1 Service Provider.

Olo provides mobile and web-based online ordering for restaurants. For online and mobile ordering, cardholder data is collected for payment and processed using Olo's processors. Credit card data can be collected when an account is opened and saved for future orders or can be collected at the time of order. Olo uses tokenization solutions offered by its various processors to provide customers with the ability to save payment information for future purchases without the need of storing cardholder data within the Olo cardholder environment. Olo does not store PAN or sensitive cardholder data.

For the Omnivore offering, Olo customers (either restaurants or service providers representing them) receive card-present transactions at a point of interaction and send the cardholder data to the Omnivore API, hosted in AWS, which forwards the transaction to an Omnivore virtual POS or to a customer-controlled, on-premise POS system via an established session with the Omnivore agent. The POS or virtual POS forwards the cardholder data to the designated processor for processing or tokenization.

For the Engage offering (referred to as Engage or Wisely), a restaurant hosts their own website or uses a third-party service provider for hosting their website. When an end-user wants to make a reservation, the website calls an iframe (managed by Olo and hosted in AWS) that uses stripe.js to load Stripe's payment page for credit card acceptance. The Engage page is served by the AWS CloudFront CDN service and code for the contents of the iframe stored in S3. No cardholder data is sent through Wisely systems.



	All cardholder data is received by Olo systems and transmitted over an HTTPS connection over the internet or public-facing API.
Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.	Olo provides a service (referred to as Omnivore) that facilitates integration between different POS solutions and vendors. Restaurants can receive card-present transactions and integrate them among different technologies, facilitated by a public-facing API and an agent that runs on the POS system at the merchant location.
Describe system components that could impact the security of account data.	Olo has the ability to send order transaction information to a customer's POS systems through POS integration. The POS system contacts the Olo platform to open a secure session. Order information is sent through that session back to the POS as it is received. This POS integration is different from the Omnivore product described above, in that cardholder data is not sent to the POS, but is in scope of Olo's PCI program due to the connectivity aspect.



#### 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.

Olo provides an eCommerce-based ordering platform. The entire Olo CDE is hosted within the AWS environment. All cardholder data is received and transmitted through the use of HTTPS. All management (SSH and RDP) is through the use of a two-factor VPN or the AWS management console. No cardholder data is stored. All cardholder data is sent through the Olo platform to the processors, to the merchant's POS system, or redirected at the browser to the processors for processing or tokenization.

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
N/A – Handling of all cardholder data, including storing, processing, and transmitting, is handled within the PCI-validated, third-party service provider environment (provided by AWS).	Not Applicable	Not Applicable
Corporate Office	1	New York, NY, USA



### 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

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

<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 2f. Third-Party Service Providers (ROC Section 4.4)

For the services being validated, does the er that:	tity have relationships with one or more third-part	y service providers		
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))				
<ul> <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 laaS, PaaS, SaaS, and FaaS cloud providers)</li> </ul>				
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:			
Cloudflare	Cloudflare provides the WAF and other related s the Olo environment	security services for		
AWS	Physical security, hardware configuration and installation, IDS, antivirus, logging (Infrastructure-as-a-service)			
Sumo Logic	Security Services (Logging)			
Microsoft Azure	Mobile Development			
Adyen N.V.	Payment Processor and tokenization services			
Paymentech LLC.	Payment Processor and tokenization services			
CyberSource	Payment Processor and tokenization services			
Elavon, Inc.	Payment Processor and tokenization services			
First Data Merchant Services, LLC	Payment Processor and tokenization services			
FreedomPay	Payment Processor and tokenization services			
Heartland Payment Systems, LLC	Payment Processor and tokenization services			
Merchant Link, LLC	Payment Processor and tokenization services			
Stripe	Payment Processor and tokenization services			
TD Merchant Solutions	Payment Processor and tokenization services			
TSYS Acquiring Solutions	Payment Processor and tokenization services			
Vantiv Acquiring Systems	Payment Processor and tokenization services			
Worldpay Mercury Integrated Payment Processor and tokenization services				
Note: Requirement 12.8 applies to all entities	s in this list.			



#### 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: Olo Platform, Engage (Wisely), Omnivore

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



For any Not Applicable responses, identify which subrequirements were not applicable and the reason.

- 1.2.6, 2.2.5 No insecure services, protocols, ports, or daemons are allowed in the environment.
- 2.3.1-2.3.2 No wireless networks are used in or to connect to the CDE.
- 3.3.3-3.7.9 No CHD is stored in the environment.
- 4.2.1.1 Future-dated requirement, best practice until March 31, 2025.
- 4.2.1.2-4.2.2 Wireless networks are not permitted in the environment. PAN is not stored in the environment and is never sent via end-user messaging technologies.
- 5.2.3-5.2.3.1 All systems in the environment have anti-malware.
- 5.3.2.1 Continuous behavioral analysis is performed to meet requirement 5.3.2
- 6.4.3 Future-dated requirement, best practice until March 31, 2025.
- 7.2.5-7.2.5.1 Future-dated requirement, best practice until March 31, 2025.
- 7.2.6 No CHD is stored in the environment.
- 8.2.3 Olo does not have remote access to any customer premises.
- 8.2.7 No third-party user accounts exist in the CDE that aren't part of the validated managed services provided by the respective third party. .
- 8.3.10-8.3.10.1 No accounts exist where passwords/passphrases are used as the only authentication factor for customer access.
- 8.3.11 No physical or logical security tokens, smart cards, or certificates are in use for authentication in the Olo environment.
- 8.5.1 Future-dated requirement, best practice until March 31, 2025.
- 8.6.1-8.6.2 No application or system accounts exist that can be used for interactive login.
- 9.4-9.5.1.3 The entire Olo CDE is housed within the PCI DSS-validated AWS hosting environment. The respective service provider manages Requirement 9 on behalf of their customers, as attested to in their Attestation of Compliance. No other media is generated. No point-of-presence devices exist.
- 10.2.1.1 No CHD is stored in the environment. No access to CHD exists to log.
- 10.3.4 Sumo Logic only allows read-only view of log messages stored on the log repository. It is natively impossible to alter these files.
- 10.4.2.1, 11.3.1.1- Future-dated requirement, best practice until March 31, 2025.
- 10.3.2.1 No significant external changes occurred in the environment.
- 11.4.7 Olo is not a multi-tenant service provider.



	11.6.1, 12.3.1 – Future-dated requirement, best practice until March 31, 2025.
	12.3.2 – No requirements in this ROC used a customized approach.
	12.3.3-12.3.4– Future-dated requirement, best practice until March 31, 2025.
	12.5.3 – No significant changes occurred in the environment during the audit period that could affect the PCI scope.
	12.6.2, 12.10.4 – Future-dated requirement, bes practice until March 31, 2025.
	Appendix A1 – Olo is not a multi-tenant service provider.
	Appendix A2 – No POI devices exist within the environment.
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:	2024-11-19
<b>Note:</b> This is the first date that evidence was gathered, or observations were made.	
Date Assessment ended:	2025-02-26
<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)

Indica  Fu as  Pa as  Base	ate below whether a full or partial all Assessment – All requirement Not Tested in the ROC.  Artial Assessment – One or more Not Tested in the ROC. Any requirement on the results documented in the ROC.	in the ROC dated (Date of Report as noted in the ROC 2025-02-26). PCI DSS assessment was completed: Its have been assessed and therefore no requirements were marked be requirements have not been assessed and were therefore marked be uirement not assessed is noted as Not Tested in Part 2g above.  The ROC noted above, each signatory identified in any of Parts 3b-3d,				
-	plicable, assert(s) the following of one):	compliance status for the entity identified in Part 2 of this document				
	<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 <i>Olo Inc.</i> has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above.					
	<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: YYYY-MM-DD						
	th a Non-Compliant status may be required to complete the Action Confirm with the entity to which this AOC will be submitted before					
	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 (Service Provider Company Name) 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.					
	This option requires additional review from the entity to which this AOC will be submitted.					
	If selected, complete the following:					
	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)								
$\boxtimes$	The ROC was completed according to <i>PCI DSS</i> , Version 4.0.1 and was completed according to the instructions therein.							
	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.							
Part 3b. Service Provider Attestation								
Signed by:  Mc Edmonds								
Signa	7354137034E437 ture of Service Provider Executive Officer	· 1	Date: 2/27/2025   13:32 MST					
Servi	ce Provider Executive Officer Name: Nick	Edmonds	Title: CISO					
Part	3c. Qualified Security Assessor (Q	SA) Acknowledger	ment					
	SA was involved or assisted with this ssment, indicate the role performed:	□ QSA performed testing procedures.						
7330	sament, indicate the role performed.	☐ QSA provided other assistance.  If selected, describe all role(s) performed:						
Signed by: Thurst Hansen								
Signa	A190EC3A26A491. Ature of Lead QSA ↑		Date: 2/27/2025   17:21 MST					
Lead QSA Name: Trevor Hansen								
Signed by: Gary Glown								
Signature of Duly Authorized Officer of QSA Company 1			Date: 2/27/2025   11:34 MST					
Duly	Authorized Officer Name: Gary Glover		QSA Company: SecurityMetrics					
Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement								
	ISA(s) was involved or assisted with this ssment, indicate the role performed:	☐ ISA(s) performed testing procedures.						
	osmon, 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>