

PCI Compliance Documentation

Sandrake Solutions

Third-Party Service Provider Oversight Policy

(PCI DSS 12.8 compliance)

Purpose

This policy ensures that Sandrake Solutions maintains oversight of third-party service providers (TPSPs) that handle cardholder data on our behalf, even though our firm does not store, process, or transmit card data directly.

Scope

Applies to all payment activities processed through:

- Intuit/QuickBooks Online (invoicing and card payment processing)
- Venmo/PayPal (peer-to-peer and business transactions)
- Wells Fargo (Zelle, wire transfers, ACH)

Provider List

- Intuit/QuickBooks Provides invoicing and card payment processing.
- Venmo/PayPal Provides business payments and card acceptance.
- Wells Fargo (Zelle/wire/ACH) Provides bank-to-bank transfers.

Written Agreements

Sandrake Solutions maintains Terms of Service / Merchant Agreements with each provider.

These agreements confirm that each provider is responsible for the security of cardholder data they process.

Due Diligence 5

Only established, PCI DSS-validated providers are selected.

Documentation of provider PCI compliance is reviewed annually (via their websites or compliance reports).

Responsibility Matrix

TPSPs: Responsible for all cardholder data processing, encryption, storage, and transmission.

Sandrake Solutions: Responsible for secure login credentials, enabling MFA, not downloading/storing raw card data, and training staff on secure practices.

Shared: Protecting access to accounts (passwords, MFA) and monitoring account activity.

Review

This policy and provider compliance status are reviewed annually and updated as needed.

Sandrake Solutions — Incident Response Plan

(PCI DSS 12.10 compliance)

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Purpose Scope

02

This plan defines how Sandrake Solutions will respond to suspected or confirmed payment security incidents that may affect our third-party payment accounts.

Applies to payment activities handled through Intuit/QuickBooks, Venmo/PayPal, and Wells Fargo.

Roles & Responsibilities Incident Lead: James Sandlin

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<u>james@sandrakesolutions.com</u> Responsible for initiating response, communicating with providers, and notifying clients if needed.

Incident Response Steps

If Intuit, Venmo, or Wells Fargo notify us of a potential breach or unusual activity, we act immediately.

Suspend payment activity until the issue is resolved.

Communication

Detection & Notification

Containment & Mitigation

Change account passwords, enable/verify MFA, and secure devices.

3 Contact affected clients if their payments may be impacted.

Recovery

Resume normal operations only once the provider confirms systems are secure.

Follow provider instructions (Intuit, Venmo, Wells Fargo) for escalation and reporting.

Documentation

Keep a written record of the incident, communications, and resolution steps.

Review & Testing

Business Continuity

In case of prolonged outages, payments can be rerouted via Wells Fargo wire/ACH as backup.

This plan is reviewed annually.

Updated immediately if payment methods or

providers change.

Contact for Issues

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