VISA

Third Party Agent Registration Program Frequently Asked Questions
U.S., Canada and Latin America & Caribbean Regions

General Information

What is the Third Party Agent Registration Program?

The Third Party Agent Registration Program is a Visa-mandated program established to ensure that Visa clients comply with the Visa Rules, Payment Card Industry Data Security Standard (PCI DSS) and other applicable security standards regarding their use of Third Party Agents (TPAs). Agent registration is required for all entities providing solicitation activities, managed services and/or storing, processing or transmitting Visa cardholder data for Visa clients (or on behalf of their merchants or agents). Visa clients are required to perform due diligence reviews to ensure that they understand the agent's business model, financial condition, background and PCI DSS compliance status.

What is a Third Party Agent?

A TPA is a type of Agent, not directly connected to VisaNet, that provides payment-related services, directly or indirectly, to a Visa client and/or stores, processes or transmits Visa cardholder data. The terms agent, gateway, service provider, third party processor are all various terms for third party agents. The TPA categories are listed in the table below.

TPA Category	Key Function	Functional Descriptions
Independent Sales Organization (ISO)	Provides specific services directly or indirectly to issuing and/or acquiring clients.	• ISO Merchant (ISO – M) —conducts merchant solicitation, sales, customer service, merchant transaction solicitation or merchant training activities; acts on behalf of a client for merchant solicitation, sales or service of Interlink capable POS terminals. • ISO Cardholder (ISO – C) —conducts cardholder solicitation, card application processing services and/or customer service activities. • ISO ATM (ISO – ATM) —acts on behalf of clients to deploy and/or service qualified ATMs. • ISO Prepaid (ISO – PP) —solicits other entities (i.e., merchant, corporate clients, government entities, other businesses etc.) to sell, activate or load prepaid cards on behalf of an issuer. Prepaid card sales and/or activation is a primary function of their business.

TPA Category	Key Function	Functional Descriptions
		• A High Risk Independent Sales Organization (HR - ISO) is an ISO that enters into a contract with an acquirer to provide merchant solicitation, sales, customer service, merchant transaction solicitation and/or customer training to "high-brand risk merchants."
Encryption Support Organization (ESO)	Performs cryptographic key management services to support clients' ATM programs or to deploy Point of Sale PIN Entry Devices (POS PEDs) or PIN pads. ATM and PIN Pad manufacturers that manage various cryptographic key management responsibilities for clients are also considered ESOs.	An ESO maintains a business relationship with a client that includes: • loading or injecting encryption keys into ATMS, terminals or PIN Pads • loading software into a terminal or ATM which will accept Visa branded cards • merchant help desk support, including re-programming of terminal software. Entities using vendor supplied Remote Key Distribution techniques must ensure that such vendors are registered with Visa as ESOs.
Merchant Servicer (MS)	Stores, processes, or transmits Visa account numbers on behalf of the client's merchants. The MS has a contract with the client's merchant, not with the client. The MS Agent category closes the transaction loop between the merchant and the client's processor. MSs are not directly connected to VisaNet.	An MS stores, processes, or transmits Visa account numbers on behalf of a client's merchant. A merchant servicer has a contract with a client's merchant (not necessarily with the client) and provides specific merchant services including: • online shopping carts • payment gateways • hosting facilities • web hosting • data storage • authorization and/or clearing and settlement messages
Third Party Servicer (TPS)	Stores, processes, or transmits Visa account numbers on behalf of clients. The TPS has a contract with issuing and/or acquiring clients. TPSs are not directly connected to VisaNet.	The TPS provides specific services directly to issuing and/or acquiring clients including: • transaction or back-office related functions • payment transaction processing (such as authorization messages, clearing messages, batch transmissions and data capture) • chargeback/exception item processing

TPA Category	Key Function	Functional Descriptions
		• fraud control • cardholder accounting • statement processing • remittance processing • data warehousing/capture • customer service • risk reporting/service, and/or loyalty programs • hosting facilities • data storage
Payment Facilitator (PF)	May sign a merchant acceptance agreement on behalf of an acquirer and receive settlement of transaction proceeds from an acquirer on behalf of a sponsored merchant.	• Contracts with an acquirer to provide Visa payment services to sponsored merchants. • Contracts with sponsored merchants to enable Visa payment acceptance. • Monitors compliance of sponsored merchant activity in accordance with the Visa International Operating Regulations. • Receives settlement of transaction proceeds from the acquirer on behalf of the sponsored merchant. • Must be located within the acquirer's jurisdiction. • Cannot be listed on the Terminated Merchant File (TMF), or similar files. • Cannot act as a sponsor for another Payment Facilitator. • Excluded merchant types (but may be signed under direct acquiring agreements): Internet pharmacies, Internet pharmacy referral sites, and outbound telemarketers. • PFs are not directly connected to VisaNet
High-Risk Internet Payment Facilitator (HRIPF)	Contracts with acquirers to provide payment services to high-risk merchants, high-brand risk merchant, high-risk sponsored merchants or high-brand risk sponsored merchants.	A high-risk Internet Payment Facilitator (HRIPF) is an entity that enters into a contract with an acquirer to provide payment services to high-risk merchants, high-brand risk merchant, high-risk sponsored merchants or high-brand risk sponsored merchants and signs one or more merchants belonging to high-brand risk merchant category codes, as defined in the Visa Rules.

TPA Category	Key Function	Functional Descriptions
Dynamic Currency Conversion Servicer (DCC)	Contracts with an acquirer to provide currency conversion services to sponsored merchants at checkout.	DCC agents contracts with an Acquirer to provide currency conversion services. DCCs are not directly connected to VisaNet.
Corporate Franchise Servicer (CFS)	Provide, manage or control an environment/connectivity to franchisees that may or may not host or provide payment card payment services (payment applications, inventory management systems, etc.).	The CFS is a corporate entity or franchisor that provides, manages or controls a centralized or hosted network environment irrespective of whether Visa cardholder data is being stored, transmitted or processed through it. Although it may or may not host or provide card payment services, more importantly, the insecurity of the shared network can affect an independent location or franchisee and that of its own cardholder data environment if accessed by unauthorized parties. Typically, managed services are provided to the franchisees such as property management systems, inventory control systems, menu distribution systems, etc. CFSs are not directly connected to VisaNet.
Distribution Channel Vendors (DCV)	Provide packing, storing and shipping of non-personalized Visa product (e.g. warehouses, wholesalers, logistics companies)	For more information please contact AVPamericas@visa.com.
Instant Card Personalization Issuance Agent (ICPIA)	Perform instant card personalization and issuance for the issuer that is generally a retailer or a kiosk location.	For more information please contact AVPamericas@visa.com. ** ICPIA employer or government managed programs must comply with the requirements listed in the Visa Rules Agents section, with the exception of the agent registration requirement.

Registration – Agent Questions

Can I register my company directly with Visa?

No. Only Visa clients can register agents. Agents cannot register themselves. Visa clients must register all agents they work with and any agents used by their merchants. Visa clients are liable for their agents and therefore must perform their own due diligence and weigh the operational and financial risks of using agents.

How do I identify my Visa client?

Some agents may not contract with a Visa client directly (Visa issuer or acquirer). If an agent contracts with a merchant, the Visa acquirer behind that merchant is required to register the agent. Merchant Servicer agents can go to Merchant Servicer Self-Identification Program (MSSIP) website and sign up for MSSIP to get registered by a Visa acquirer.

Registration – Visa Client Questions

How do I register a Third Party Agent?

Visa clients must use the Visa Membership Management (VMM) to register third party agents. VMM is an online tool that allows clients to register and maintain third party agents. To use VMM, clients must first be enrolled on Visa Online (VOL).

- To enroll for VOL go to www.visaonline.com.
- Once VOL enrollment has been approved the client must request access to VMM.
- Search for VMM on VOL and accesses the VMM link.
- If the client has never accessed VMM before they will be prompted to register as a new user of VMM.
- For support with VMM registration email publicationorders@visa.com or call (650) 432-7064.
- Ensure due diligence has been completed.
- Understand the agent type prior to registration.
- Have all applicable documentation (PCI DSS, DBA filing) ready for upload in VMM as part of initial registration.

Are there agent registration fees?

Yes. Visa clients are assessed the following fees for agent registration:

- $5,000 USD for registration and annual renewal for ISO, PF, HRIPF and DCV
- $1,000 USD for registration and annual renewal for, ESO and TPS

Each Visa client that registers a third party agent is assessed an initial registration and annual renewal fee for that agent; based on the agent type registered. Annual renewal fee are assessed up to $5,000 USD per agent per region. There is no fee assessed to Visa clients for ICPIA, MS, DCC or CFS registration.

Clients are expected to have finalized all due diligence reviews of their agent prior to registration. Initial registration indicates to Visa that the agent is ready, and approved by the client, to begin providing services to the client. Therefore registration fees are non-refundable once Visa approves the initial registration.

What kind of due diligence is required?

Visa clients should look into the agent's basic background, financial and operational reviews. Additionally, any agent that provides managed services and/or stores, processes or transmits Visa cardholder data must be PCI DSS compliant or in the process of validating compliance with a reasonable target completion date. However, Visa clients are encouraged to increase the scope of review based on the agent business type, services performed, relative program risk, Visa cardholder data held or processed and the individual Visa client's internal risk appetite and requirements. Refer to the Third Party Agent Due Diligence Risk Standards, Global Acquirer Risk Standards Program Guide and Visa Global Brand Protection Program Guide for Acquirers, as applicable, for more information.

Is registration required for all agents?

Yes. If a Visa client has a relationship with an agent, directly or indirectly, they must register the agent with Visa per the Visa Rules. The fine for using an unregistered third party agent starts at $10,000 per agent.

Can I register an agent before they validate PCI DSS compliance?

Yes. For existing or previously registered agents: Visa clients must provide Visa with the QSA company name (if applicable) and the planned validation date to suspend fine assessments. For new agents (never registered): Visa clients must provide Visa with a QSA engagement letter on the QSA's letterhead. The planned validation date must also be provided to Visa to suspend fines (may not be on the QSA engagement letter). For agents validating PCI DSS compliance via a Self-Assessment Questionnaire (SAQ-D), an expected date of completion is required. Go to http://www.pcisecuritystandards.org for a list of approved QSAs.

What is the Visa client liability for a TPA?

Visa clients are required to register all third party agents per the Visa Rules. In addition, clients are responsible for ensuring that any TPA it registers complies with the Visa Rules and is PCI DSS compliant, or compliant with any other applicable data security standards. Visa clients may be subject to fines and penalties for using an unregistered agent, or an agent found to be out of compliance with the PCI DSS or found to be in violation of the Visa Rules. All agents must be registered and compliant with applicable data security standards prior to beginning services in which they would have access to cardholder data.

Is registration required for software providers?

No. Point-of-Sale (POS) software providers that only sell the payment application and do not store, process or transmit Visa cardholder data are not required to register. The Payment Application Data Security Standard (PA-DSS) is available to ensure the secure development of these applications. Details on payment applications are available at www.visa.com/pabp.

Is registration required if a Visa client owns at least 25% of an agent?

Third party agents are exempt from the registration requirements specified in Third Party Registration Requirements and the associated fees if it (1) only provides services on behalf of its affiliates (including parents and subsidiaries); and (2) those affiliates are clients that own and control at least 25% of the Third Party Agent.

Is registration required for sub-ISOs?

ISO registration is required for any entity that solicits on behalf of a Visa client. An ISO is any entity that solicits merchant or cardholder accounts, discusses pricing, fees or rates, processes merchant or cardholder accounts, discusses terms and agreements, manages and /or drafts contracts, submits contracts to the acquirer or issuer (their registering client bank). A registered ISO may use referral entities or sales representatives to solicit on their behalf; however, those entities may only solicit and market in the name of the registered ISO. Acquirers must not process applications from any entity that they have not registered as an ISO with Visa. Registration is not required for referral entities or sales representatives that solicit in the name of the registered ISO. Referral entities or sales representatives who market in their own name may only generate leads to registered ISOs and may not provide ISO services such as direct solicitation of merchant or cardholder

accounts, discuss pricing, fees or rates, process merchant or cardholder accounts, discuss terms and agreements, manages / draft contracts, submit contracts to an acquirer or issuer.

Payment Facilitators

What is a Payment Facilitator?

A Payment Facilitator is the new term for entities formally known as Payment Service Providers. A Payment Facilitator is a third party agent that may sign a merchant acceptance contract on behalf of an acquirer and receive settlement of transaction proceeds from an acquirer on behalf of a sponsored merchant.

How do I identify a Payment Facilitator versus a Merchant?

As set out in the Visa Rules, to be classified as the seller of the goods and services (and therefore a merchant) an entity must:

- Primarily use its name to identify the Merchant Outlet: This often refers to the brand or name on the sign outside a face to face merchant, or the name displayed on a website. For example, a franchisee, department store or consignment shop all display their names as the name of the merchant outlet to cardholders.
- Represent itself as selling the goods and services to the cardholder: Sometimes there are multiple names shown at the point of sale. The most prominent name may not always be the name of the merchant. For example, a mall specializes in antique shops and has a prominent brand. The brand is displayed prominently inside and outside the mall. The shops are all small vendors, and some sell similar goods to other shops. Although most customers may be attracted to the venue by the mall's reputation, the individual shops are representing themselves as selling the antiques, and it is the shops (not the mall) that must be the merchant in a Visa transaction.
- Provide recourse in the event of a dispute: This is more than just providing the first line of customer enquiry. Viewing the terms and conditions of the sale is a strong guide as to who this entity is. The entity will only be considered a merchant if it is financially responsible to the cardholder for resolving disputes.

An entity that aggregates merchant outlets that does not have all of the abovementioned attributes will be considered a payment facilitator. Visa reserves the right to determine whether an entity is a merchant or payment facilitator, and may use additional criteria to make this determination, such as the entity name on the transaction receipt, and whether the entity owns or takes possession of the goods or services; books the sale as revenue; or provides customer service and handles returns.

Are Payment Facilitators required to validate PCI DSS compliance as a Level 1 Service Provider?

No. A Payment Facilitator can validate PCI DSS compliance as a Level 1 or Level 2 Service Provider with the PCI DSS Attestation of Compliance (AOC) or SAQ-D prior to commencing operations.

Are there new registration requirements for Payment Facilitators?

Yes. The Payment Facilitator name that appears in conjunction with the sponsored merchant name on transaction receipts and billing statements, the BIN used, and the location of the Payment Facilitator must be included in the comments section of the VMM registration case. Note: Reference the Merchant Data Manual (MDM) for Merchant Name Description formatting requirements for Payment Facilitators.

What is the difference between a Payment Facilitator and other service providers that process Visa transactions?

Payment Facilitators contract with an acquirer to provide any of the following services:

- Solicitation, onboarding, and sponsoring of merchants (directly sign merchant agreements for sponsored merchant with under $100k annual Visa volume)
- Aggregate transactions for sponsored merchants
- Store, process, or transmit Visa cardholder data
- Provide other payment related services including card acceptance, card processing, and settle funds directly with sponsored merchants.

Other third party agents such as MS and TPS entities do not provide solicitation activities, sponsor merchants directly or settle directly; the acquirer settles with their merchant directly though their unique merchant IDs.

Payment Card Industry Data Security Standard (PCI DSS)

What is the PCI DSS?

In 2006, Cardholder Information Security Program (CISP) requirements were incorporated and adopted into an industry standard known as the Payment Card Industry Data Security Standard (PCI DSS). This standard is now owned and managed by the PCI Security Standards Council (PCI SSC).

What is the Cardholder Information Security Program (CISP) / Account Information Security (AIS)?

Mandated since June 2001 and instituted by Visa Inc., the Cardholder Information Security Program (CISP) / Account Information Security (AIS) protects Visa cardholder data wherever it resides and ensures that Visa members, merchants and agents adhere to accepted information security standards.

What types of agents require PCI DSS compliance?

Any agent that provides managed services and/or stores, processes or transmits Visa cardholder data must validate PCI DSS compliance at the time of registration or provide proof that the agent is the process of validating compliance with a reasonable target completion date. PCI DSS compliance validation with Visa is required every 12 months thereafter. The fine assessed to clients for using a non-compliant starts at $10,000 USD per agent. Agent that performs one or more services reviewed in the PCI DSS assessment fall into one of the following agent types and requires PCI DSS compliance validation: Third Party Servicer (TPS), Merchant Servicer (MS), Corporate Franchise Servicer (CFS), Payment Facilitator (PF), High Brand Risk Internet Payment Facilitator (HBRIPF), Dynamic Currency Conversion (DCC).

Are there different PCI DSS validation requirements for each Service Provider Level?

Yes. Agents fall into two levels based on the volume of Visa transactions stored, processed or transmitted annually. There are different validation requirements for each level:

Level	Validation Action	Description	Validated By
1	Annual On-Site PCI Data Security Assessment	All Third Party Agents that store, process, or transmit more than 300,000 Visa transactions annually	Qualified Security Assessor (QSA)
	Quarterly Network Scan		Approved Scanning Vendor (ASV)
2	Annual PCI Self-Assessment Questionnaire	All Third Party Agents that store, process, or transmit fewer than 300,000 Visa transactions	Service Provider (the third party agent)

	Quarterly Network Scan	annually	Approved Scanning Vendor (ASV)

Listing on The Visa Registry of Service Providers - Are You on the List?

How do I get listed on the Registry?

To be listed on the Visa Global Registry of Service Providers, the agent must be registered by a Visa client as an MS, TPS, PF, HRIPF or CFS, **and** have current PCI DSS compliance validation via QSA and onsite assessment (AOC) approved by Visa and / or be registered by a Visa client as an ISO or ESO.

How do I submit PCI DSS documentation to Visa?

The Visa client, agent or the agent's QSA can submit an executed PCI DSS AOC form to Visa via e-mail to pcirocs@visa.com. After review of the AOC, Visa will send e-mail notification confirming acceptance of the compliance validation or indicating that registration is not in place and is required before acceptance. Visa will only accept SAQ-Ds sent via pcirocs@visa.com for existing agents revalidating compliance. New and registered MS agents should submit their PCI DSS compliance validation documents to Visa through MSSIP.

Can the PCI DSS AOC include multiple listing names?

No. Visa requires one listing name per AOC. If multiple business lines are included in one assessment, simply provide separate forms to validate compliance for each business name.

How do I get my company listed as operating in multiple regions?

The agent must be PCI DSS compliant and registered by a Visa client in the region to be listed in that region. The submitter of the AOC, usually the QSA, indicates the region(s) where the agent operates. Visa will validate that PCI DSS compliance is current, and registration is in place for the indicated region(s) prior to publishing.

How often does Visa require PCI DSS compliance validation?

Any agent that stores, processes or transmits Visa cardholder data must perform the PCI DSS compliance review every 12 months.   If Visa does not receive the appropriate revalidation documents, the agent's listing on the Registry changes as follows:

- 1 - 60 days overdue, the service provider is highlighted in Yellow on the Registry
- 61 - 90 days overdue, the service provider is highlighted in Red on the Registry
- After 91 days overdue, the service provider is removed from the Registry

Do TPAs that handle PIN require PCI DSS compliance?

No. PCI DSS compliance is not applicable but the agent must be compliant with PCI PIN compliance requirements. If an ESO agent deploying ATM, point-of-sale (POS) or kiosk PIN acceptance devices that process and accept cardholder PINs and/or manage encryption keys (i.e., key injection facilities) or TPS PIN-acquiring agent that stores, processes or transmits Visa account numbers and PINs on behalf of Visa members, the client must ensure that the on-site review of the agent's PIN security controls is conducted to validate compliance with the Payment Card Industry PIN Security Requirements, and the PCI Payment Transaction Security (PTS) Points of Interaction (POI) Modular Security Requirements and the Visa PIN Security Program Guide. These manuals contain the physical and logical security requirements for all payment security devices. Clients must also establish policies and procedures that include an annual review of the agent's processes and

controls to ensure that the agent remains compliant with applicable PCI PIN Security requirements and PCI PTS POI manuals (https://www.pcisecuritystandards.org/security_standards/documents.php). For more information please visit our website www.visa.com/pin. **Note:** If the TPA handles PIN and provides other payment related services, they may require PCI DSS compliance validation in addition to PCI PIN security requirements. **Note:** If the TPA handles PIN and provides other payment related services, they may require PCI DSS compliance validation in addition to PCI PIN security requirements.

Other Program Related Questions

How do I update my company information?

The Visa client will update agent information in VMM. Registered agents are required to notify their Visa client of any changes to information such as:

- Legal Name / Business Aliases (DBAs, Alternate Names)
- Legal Address
- Company Primary Contact
- Types of services offered
- Number of Visa transactions processed annually
- Compliance status (where applicable)
- Mergers and Acquisitions
- Financial solvency

How do I register a Doing Business As Name (DBA)?

A DBA name (or assumed name or trade name) is a business name that is different from the principal's personal name, the names of the entity partners or the officially registered name of the company. Doing Business As Names (DBA) must be registered by the client in VMM. Legal documentation such as the state filing of the DBA name must be attached to the VMM case. For publishing another DBA on the registry submit a separate PCI DSS AOC with the DBA to pcirocs@visa.com. The client must ensure the DBA name is current and:

- DBA name has been filed with the appropriate agency
- DBA has the same operational management
- DBA is not a separate legal entity

What is the difference between a Doing Business As (DBA) name and Alternate Name?

Alternate names are names under which companies operate professionally and are neither the personal name of the owner of a business nor the legal name of a corporation. If the alternate name contains the legal name attached to a name of service, application, data center location, etc. no additional documentation is needed. DBA or alternate name can be included in the initial registration or added at any time. To be published on the registry, the alternate name must be registered and a separate AOC with the alternate name has been accepted by Visa.

How long does it take for a PCI DSS validation submission to be processed?

Submissions are processed within two weeks. Compliance documentation is due via email to pcirocs@visa.com by the 15th of the month prior to the next month's publication.

How long does it take for agent registration cases to be completed?

Agent registration cases are processed within 5-7 business days of receipt.

Who should I contact for TPA registration and Registry questions?

Email Agentregistration@visa.com for U.S. and Canada or AgentregistrationLAC@visa.com for LAC and email pcirocs@visa.com for questions about the Registry.