

Curators of the University of Missouri

<Merchant Name>

Category P2PE Merchant

Credit Card Security Policies

PCI DSS 4.0

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Revision History

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| --- | --- | --- |
| Changes | Approving Manager | Date |
| Initial Publication |  |  |
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**Introduction and Scope**

**Introduction**

This document explains the Curators of the ’s credit card security requirements as required by the Payment Card Industry Data Security Standard (PCI DSS) Program. The Curators of the management is committed to these security policies to protect information utilized by in attaining its business goals. All employees are required to adhere to the policies described within this document.

**Scope of Compliance**

The PCI requirements apply to all systems that store, process, or transmit cardholder data. Currently, **<Merchant’s>** cardholder environment consists only of Validated P2PE solutions or E2EE solutions and scope reduction has been granted by the acquiring bank. The environment does not include storage of cardholder data on any computer system.

Due to the limited nature of the in-scope environment, this document is intended to meet the PCI requirements for category P2PE merchants as defined in the University Credit Card Policy. Should **<Merchant>** implement additional acceptance channels, begin storing, processing, or transmitting cardholder data in electronic format, or otherwise become ineligible to validate compliance as a category P2PE merchant, it will be the responsibility of **<Merchant>** to determine the appropriate compliance criteria and implement additional policies and controls as needed. In addition, prior to making changes to merchant category or processing method, the **<Merchant>** must provide a compliance plan. Examples of changes are: purchasing, selling, or discarding a terminal; purchasing software; selecting a new service provider, or changing the way you process or accept payments. If the cardholder data environment changes and the **<Merchant>** will process cardholder data on the Internet or is using new software, a QSA may be retained to review the new process prior to implementation.

**Requirement 3: Protect Stored Cardholder Data**

**Data-retention**

* All security policies and operational procedures that are identified in Requirement 3.x.x are:
	+ Documented
	+ Kept up to date
	+ In use
	+ Known to all affected parties. (PCI Requirement 3.1.1)
* Account data storage is kept to a minimum through implementation of data retention and disposal policies, procedures, and processes that include at least the following:
	+ Coverage for all locations of stored account data.
	+ Coverage for any sensitive authentication data (SAD) stored prior to completion of authorization.
		- This bullet is a best practice until its effective date 03/31/2025
	+ Limiting data storage amount and retention time to that which is required for legal or regulatory, and/or business requirements.
	+ Specific retention requirements for stored account data that defines length of retention period and includes a documented business justification.
	+ Processes for secure deletion or rendering account data unrecoverable when no longer needed per the retention policy.
	+ A process for verifying, at least once every three months, that stored account data exceeding the defined retention period has been securely deleted or rendered unrecoverable. (PCI Requirement 3.2.1)

**Prohibited Data**

The card verification code is not retained upon completion of the authorization process. (PCI Requirement 3.3.1.2)

**Requirement 9: Restrict Physical Access to Cardholder Data**

**Physically Secure all Media Containing Cardholder Data**

All security policies and operational procedures that are identified in Requirement 3 are:

* Documented.
* Kept up to date.
* In use.
* Known to all affected parties. (PCI Requirement 9.1.1)

Hard copy materials containing confidential or sensitive information (e.g., paper receipts, paper reports, faxes, etc.) are subject to the following storage guidelines:

* All media must be physically secured. (PCI Requirement 9.4.1)
* Offline media backups with cardholder data are stored in a secure location. (PCI Requirement 9.4.1.1)

**Destruction of Data**

Hard-copy materials with cardholder data are destroyed when no longer needed for business or legal reasons, as follows:

* Materials are cross-cut shredded, incinerated, or pulped so that cardholder data cannot be reconstructed.
* Materials are stored in secure storage containers prior to destruction. (PCI Requirement 9.4.6)

**Point-of-interaction (POI) devices are protected from tampering and unauthorized substitution.**

POI devices that capture payment card data via direct physical interaction with the payment card form factor are protected from tampering and unauthorized substitution, including the following:

A [**Capture Device Inventory Log**](https://sharepoint.umsystem.edu/sites/uminfopoint/media/fa/treasurer/credit_cards/Capture_Device_Inventory_Log.docx?d=w01eea484fe174cd688f377c95f01128f) must be kept at every merchant location with a terminal device. All capture devices must be periodically inspected to look for tampering or substitution using the [**Capture Device** **Periodic Inspection Form**.](https://sharepoint.umsystem.edu/sites/uminfopoint/media/fa/treasurer/credit_cards/Capture_Device_Inspection_Log.docx?d=w660489f0bdcc454591f3aa5ea58acaf5)  (PCI Requirement 9.5.1)

The [**Capture Device Inventory Log**](https://sharepoint.umsystem.edu/sites/uminfopoint/media/fa/treasurer/credit_cards/Capture_Device_Inventory_Log.docx?d=w01eea484fe174cd688f377c95f01128f) must contain a list of all devices that capture payment card data (such as card swipe or dip). The Inventory log must contain at the minimum Make, model, location of device, and device serial number (or other method of unique identification). Furthermore, if you have mobile device(s) you must maintain a [**Cellular Terminal Log**](http://umurl.us/CHh7X) detailing who has the device while it is in transit (for every location if applicable). Ensure the list is updated anytime devices are added, relocated or no longer used. (PCI Requirement 9.5.1.1)

**Capture Device Inspection**

All capture devices must be inspected periodically to detect for tampering or substitution using the [**Capture Device Periodic Inspection Form**](https://sharepoint.umsystem.edu/sites/uminfopoint/media/fa/treasurer/credit_cards/Capture_Device_Inspection_Log.docx?d=w660489f0bdcc454591f3aa5ea58acaf5). Furthermore, all relevant personnel must be aware of the procedures for inspecting devices. (PCI Requirement 9.5.1.2)

**Capture Device Security Training**

Training is provided for personnel in POI environments to be aware of attempted tapering or replacement of POI devices, and includes:

* Verifying the identity of any third-party persons claiming to be repair or maintenance personnel, before granting them access to modify or troubleshoot devices.
* Procedures to ensure devices are not installed, replaced, or returned without verification.
* Being aware of suspicious behavior around devices.
* Reporting suspicious behavior and indications of device tampering or substitution to appropriate personnel. (PCI Requirement 9.5.1.3)

Personnel at point-of-sale locations have received training and are aware of procedures to detect and report attempted tampering or replacement of devices. (PCI Requirement 9.9.3)

**Requirement 12: Maintain a Policy that Addresses Information Security for Employees and Contractors**

**Security Policy**

**Office of the Treasurer** shall establish, publish, maintain, and disseminate a security policy that addresses how the company will protect cardholder data. (PCI Requirement 12.1.1)

The information security policy is:

* Reviewed at least once every 12 months.
* Updated as needed to reflect changes to business objectives or risks to the environment. (PCI Requirement 12.1.2)

The security policy clearly defines information security roles and responsibilities for all personnel, and all personnel are aware of and acknowledge their information security responsibilities. (PCI Requirement 12.1.3)

**Security Responsibilities**

**<Merchant’s>** policies and procedures must clearly define information security responsibilities for all personnel. (PCI Requirement 12.4)

**Incident Response Policy**

**Office of the Treasurer** and the **Information Security Officers** shall establish, document, and distribute security incident response and escalation procedures to ensure timely and effective handling of all situations. (PCI Requirement 12.5.3)

**<Merchant>** has an incident response plan and is ready to be activated in the event of a suspected or confirmed security incident. The plan includes, but is not limited to:

* Roles, responsibilities, and communication and contact strategies in the event of a suspected or confirmed security incident, including notification of payment brands and acquirers, at a minimum.
* Incident response procedures with specific containment and mitigation activities for different types of incidents.
* Business recovery and continuity procedures.
* Data backup processes.
* Analysis of legal requirements for reporting compromises.
* Coverage and responses of all critical system components.
* Reference or inclusion of incident response procedures form the payment brands. (PCI Requirement 12.10.1)

**Incident Identification**

Employees must be aware of their responsibilities in detecting security incidents to facilitate the incident response plan and procedures. All employees have the responsibility to assist in the incident response procedures within their particular areas of responsibility. Some examples of security incidents that an employee might recognize in their day to day activities include, but are not limited to,

* Theft, damage, or unauthorized access (e.g., papers missing from their desk, broken locks, missing log files, alert from a security guard, video evidence of a break-in or unscheduled/unauthorized physical entry)
* Fraud – Inaccurate information within databases, logs, files or paper record

With the exception of steps outlined below, it is imperative that any investigative or corrective action be taken only by or under the oversight of the Information Security Officer to assure the integrity of the incident investigation and recovery process. When faced with a potential situation you should do the following:

* **Preserve the evidence.** If the incident involves a compromised computer system, do not alter the state of the computer system. The following must be done:
* Do not shutdown the computer or restart the computer.
* Immediately disconnect the computer from the network by removing the network cable from the back of the computer.
* The computer system should remain on and all currently running computer programs left as is.

**Reporting an Incident**

The Information Security Officer at the respective business unit (<https://www.umsystem.edu/ums/is/infosec/iso>) should be notified immediately of any suspected or real security incidents involving cardholder data:

Contact the Information Security Officer at the respective business unit (<https://www.umsystem.edu/ums/is/infosec/iso>) to report any suspected or actual incidents. The Information Security Officer’s phone number should be well known to all employees and should page someone during non-business hours.

No one should communicate with anyone outside of their supervisor(s) or the Information Security Officer at the respective business unit (<https://www.umsystem.edu/ums/is/infosec/iso>) about any details or generalities surrounding any suspected or actual incident. All communications with law enforcement or the public will be coordinated by the Information Security Officer at the respective business unit (<https://www.umsystem.edu/ums/is/infosec/iso>).

Document any information you know while waiting for the Information Security Officer at the respective business unit (<https://www.umsystem.edu/ums/is/infosec/iso>) to respond to the incident. If known, this must include date, time, and the nature of the incident. Any information you can provide will aid in responding in an appropriate manner. (PCI Requirement 12.10.1)

**Root Cause Analysis and Lessons Learned**

Not more than one week following the incident, members of the Information Security Officer at the respective business unit (<https://www.umsystem.edu/ums/is/infosec/iso>) and all affected parties will meet to review the results of any investigation to determine the root cause of the compromise and evaluate the effectiveness of the *Incident Response Plan*. Review other security controls to determine their appropriateness for the current risks. Any identified areas in which the plan, policy or security control can be made more effective or efficient, must be updated accordingly. (PCI Requirement 12.10.1)

**Security Awareness**

**<Merchant>** shall maintain a formal security awareness program is implemented to make all personnel aware of the entities information security policy and procedures, and their role in protecting the cardholder data. (PCI Requirement 12.6.1)

**<Merchant>** shall require appropriate staff are trained to be aware of suspicious behavior and to report tampering or substitution of swipe devices. (PCI Requirement 9.5.1.3)

**Service Providers**

**<Merchant>** shall implement and maintain policies and procedures to manage service providers with whom cardholder data is shared, or that could affect the security of cardholder data, as follows. (PCI Requirement 12.8)

* A list of all third-party service providers (TPSPs) with which account data is shared or that could affect the security of account data is maintained, including a description for each of the services provided. (PCI Requirement 12.8.1)
* Written agreements with TPSPs are maintained as follows:
	+ Written agreements are maintained with all TPSPs with which account data is shared or that could affect the security of the CDE.
	+ Written agreements include acknowledgments from TPSPs that they are responsible for the security of account data the TPSPs possess or otherwise store, process, or transmit on behalf of the entity, or to the extent that they could impact the security of the entity’s CDE. (PCI Requirement 12.8.2)
* **Office of the Treasurer** will complete [the 3rd party check list](https://sharepoint.umsystem.edu/sites/uminfopoint/media/fa/treasurer/credit_cards/3rd_Party_Checklist.docx?d=w1f1f7e4b799e4d28a56643a2c720dfb8) whenever a new 3rd party service provider is to be added to the cardholder data environment to ensure proper due diligence. (PCI Requirement 12.8.3)
* A program is implemented to monitor TPSPs’ PCI DSS compliance status at least once every 12 months. (PCI Requirement 12.8.4)
* Information is maintained about which PCI DSS requirements are managed by each TPSP, which are managed by the entity, and any that are shared between the TPSP and the **<Merchant>.** (PCI Requirement 12.8.5)