

Evidence-Based Scoping in the Zettabyte Era

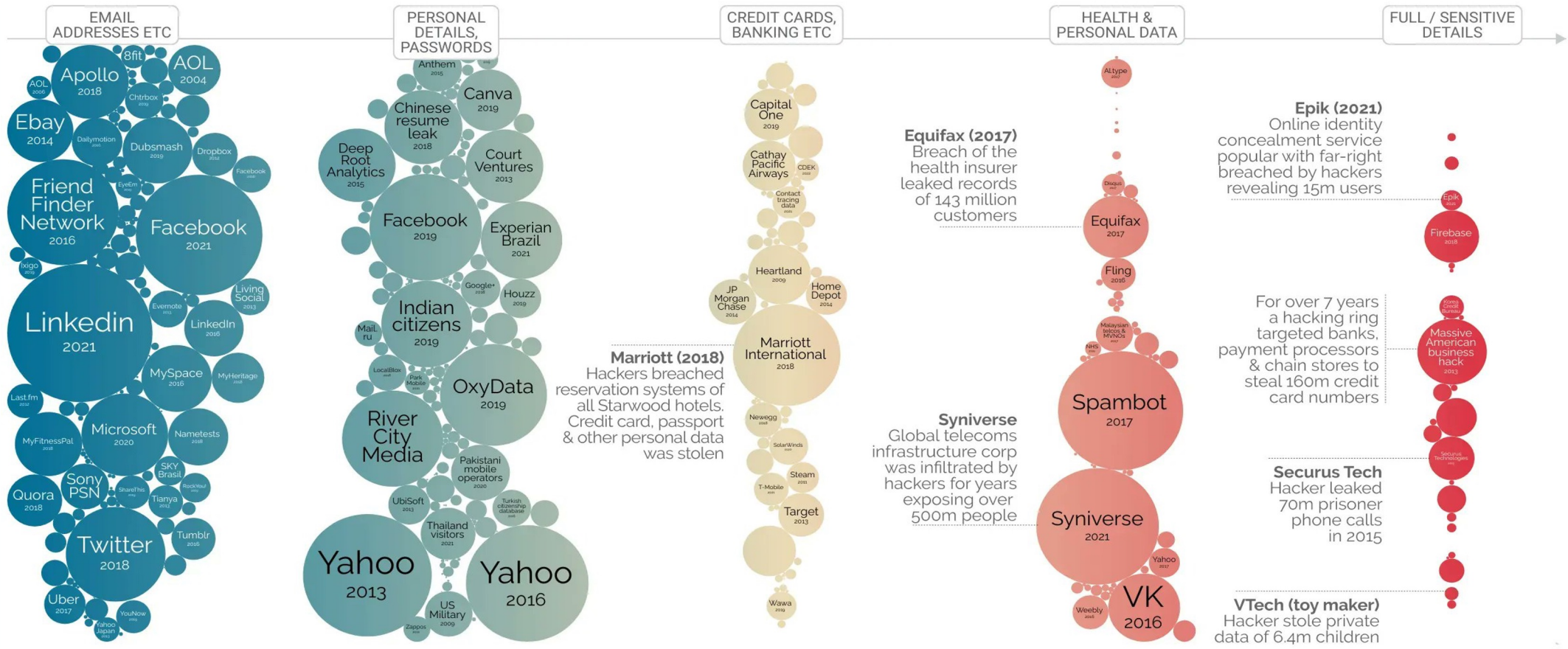
Stephen Cavey | Co-founder and Chief
Evangelist at Ground Labs

Evidence-Based Scoping in the Zettabyte Era

In this session, you'll discover:

- How poor data management leads to payment fraud
- The basics of data awareness for effective data management
- How to implement an evidence-based approach to data awareness for sustainable scoping and data security
- How this approach supports PCI DSS v4.0 compliance beyond scoping

Notable Data Breaches 2004-2022 by data sensitivity



David McCandless **Information is Beautiful**
 interactive version: geni.us/IIB-DBFB

total: 413 breaches // **sources** multiple press reports
updated 17th Jun 2022 // **data** geni.us/databreaches



Data

Data

Data

Data

Data

Data

Data

Data

Data

Data

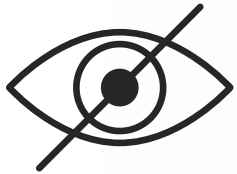
Data

Data

Legacy Data Risk in Digital Transformation



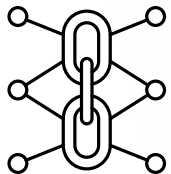
Data collection practices that drive vast data stores



Limited oversight resulting in poor visibility of high-risk data



Accelerated digital transformation increasing fragmentation



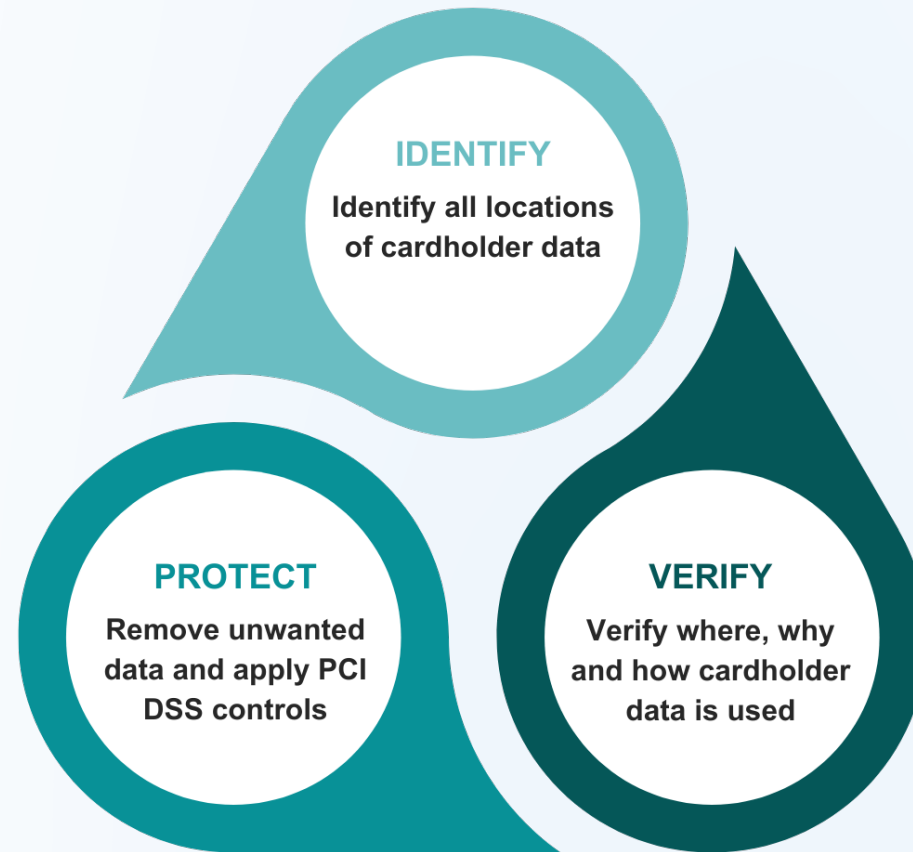
Increasingly complex supply chains leading to wider data distribution



Data, Where? Everywhere



Building Data Awareness

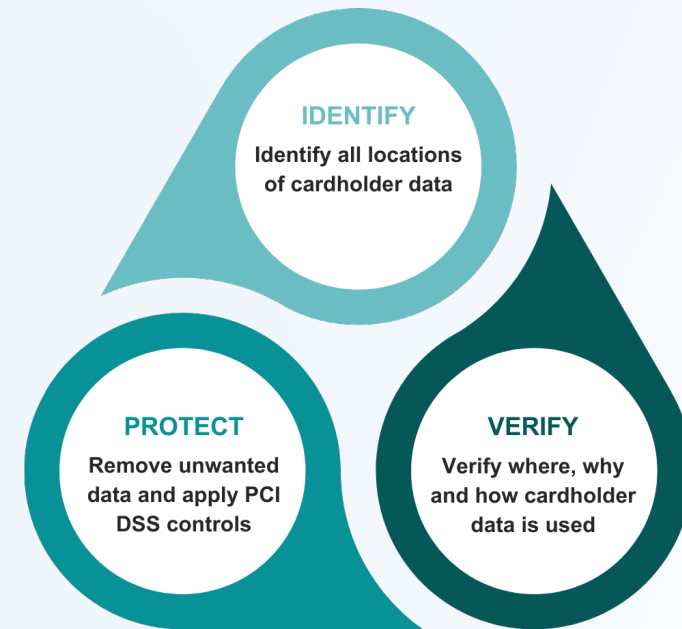


Three Steps For Sustainable Scoping

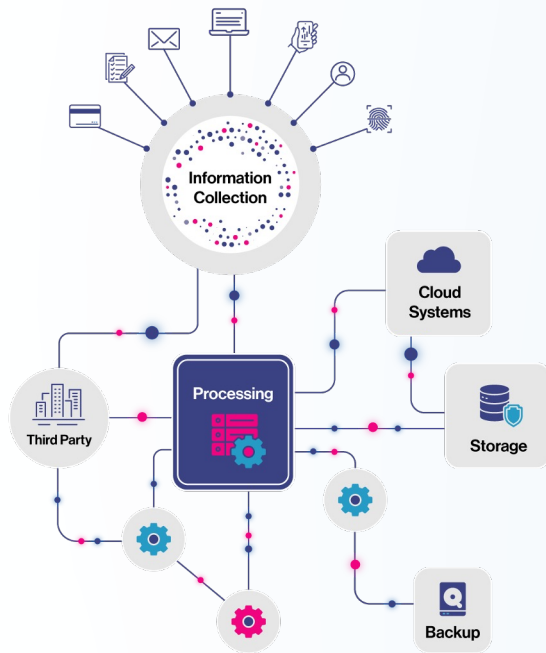
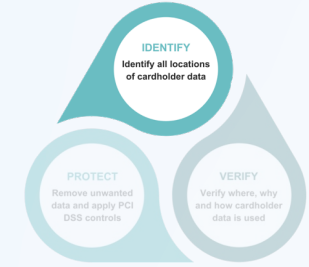
- Scoping for PCI DSS is the “process of identifying all system components, people, and processes to be included in a PCI DSS assessment”

(PCI DSS v4.0, Appendix G PCI DSS Glossary of Terms, Abbreviations, and Acronyms)

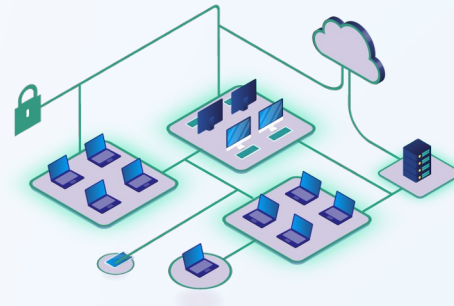
- This can be broken into three steps:
 - **Identify** all locations of payment account data
 - **Verify** those locations to confirm they are all part of the CDE
 - **Remediate** (protect) any rogue data found outside the CDE
- As a periodic or continuous process, this supports compliance with the new scoping controls in PCI DSS v4.0



Data Discovery: The Ugly, the Bad and the Good



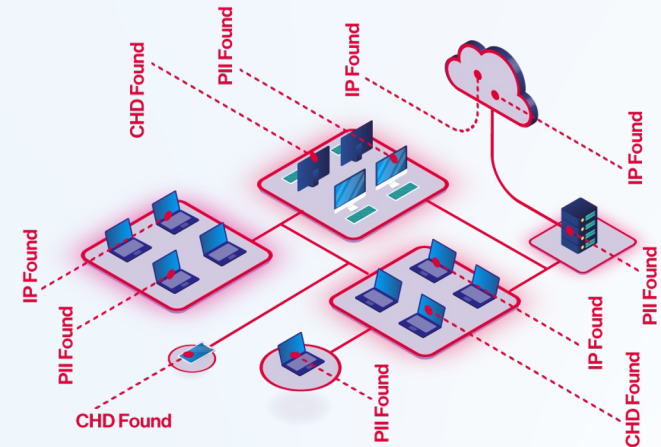
Data flow diagrams tell us where we expect to find data based on process and system design



Data flow diagrams are based on assumptions and intended design. This can lead to a false assumption that organizations have a well-managed data environment

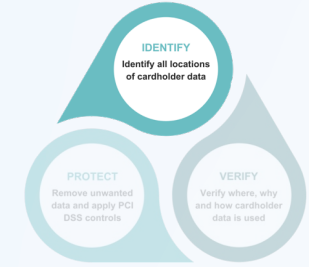
`/(regex)/`

Regular expression script-based searches can't be used across all systems and platforms and result in a high number of false positives



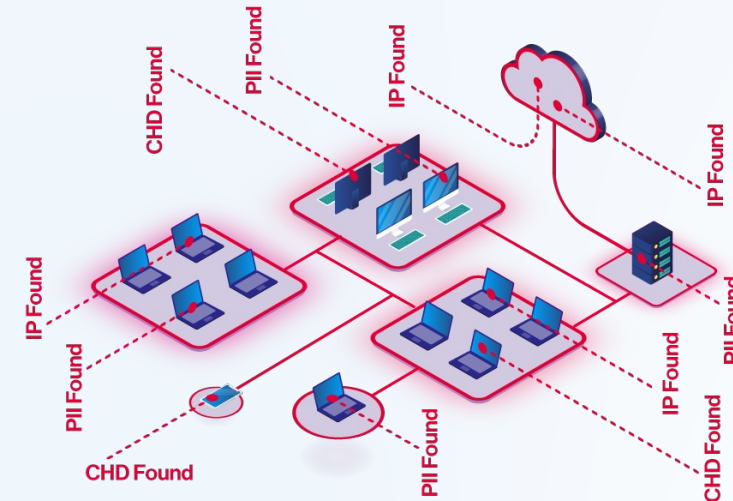
Evidence-based data discovery is context-aware and identifies data in unexpected places across all systems and platforms with minimal false findings

Identifying Data With Evidence

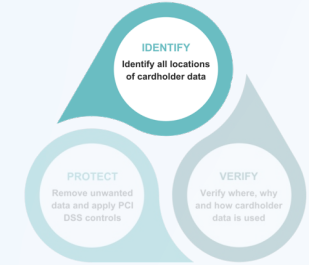


Eliminate assumptions

- Don't accept **assumptions** about the data landscape of your business
- Instead use an **evidence-based** approach to validate the data you have and understand where it resides



Consider All Data Storage Areas



Cloud and SaaS



Collaboration and Email



Databases and Big Data

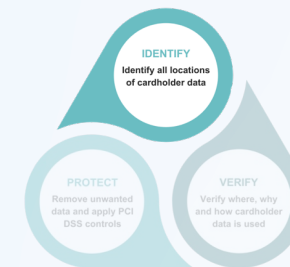


Servers and NAS



POS and Endpoints

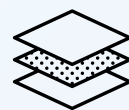
Consider All Data Sources



A thorough data discovery process should support:



A wide range of data types



Multi-layered files



Email, audio and image sources



Shadow files



Structured and unstructured data



Collaboration tools



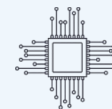
Binary Large Objects (BLOBs)



Deleted files



User data files - server and endpoint



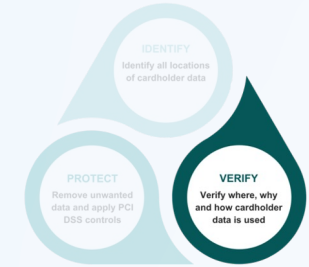
Data in memory

Verifying Data With Purpose

Evaluate and verify

Gather input from teams across the business to understand:

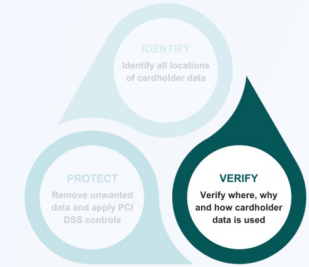
- The data they need to operate
- The purpose of the data
- What data is no longer required



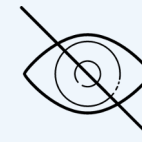
Make Remediation a Shared Responsibility

After initial discovery share findings with system and/or data owners and:

- Verify all cardholder data are inside the cardholder data environment
- Highlight any data residing outside the cardholder data environment
- Agree an appropriate treatment plan



Quarantine



Obfuscate



Encrypt

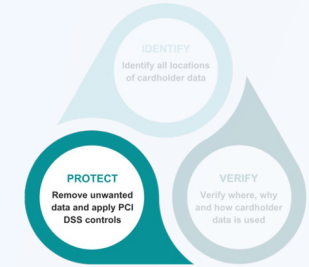


Delete

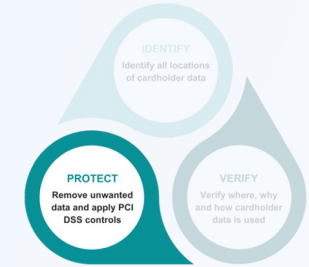
Protecting Data With PCI DSS v4.0

Apply PCI DSS v4.0

- Cleanse unnecessary data stores
- Remediate cardholder data outside the defined CDE
- Manage and maintain scope beyond assessment for sustainable compliance



Data Discovery Supports 27 Controls in PCI DSS v4.0



Requirement 1: Install and maintain network security controls

Data discovery validates the network boundaries of scope and demonstrates data flows are up to date.

Requirement 3: Protect stored account data

Discovery scans identify account data, including SAD, wherever it is stored. Periodic scans can confirm that data has been deleted when it has passed its retention period.

Requirement 6: Develop and maintain secure systems and software

Discovery scans verify that account data is not present in non-production environments

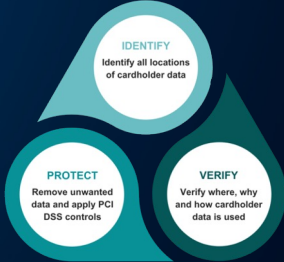
Requirement 12: Support information security with organizational policies and programs

As part of periodic scope revalidation, data discovery verifies in-scope systems and data repositories. Advanced discovery solutions offer remediation-in-place for data found in unexpected locations.

IDENTIFY

VERIFY

PROTECT



Evidence-Based Scoping in the Zettabyte Era

- Historic data collection, rapid digital transformation and growing data volumes has led to excessive storage of data and a multitude of unintended repositories
- Eliminate assumptions about data with an evidence-based approach to **identify** all data
- Evaluate and **verify** data, to understand the information that is valuable and serves a legitimate purpose
- **Protect** data based on its sensitivity and dispose of data no longer required
- Establish a continuous data awareness process (Identify—Verify—Protect) for PCI DSS scoping and effective data management.
- Sustainable compliance starts with data awareness





Thank You For Listening

Visit us at www.groundlabs.com

Download from
<https://go.groundlabs.com/gl-pcidss4>

