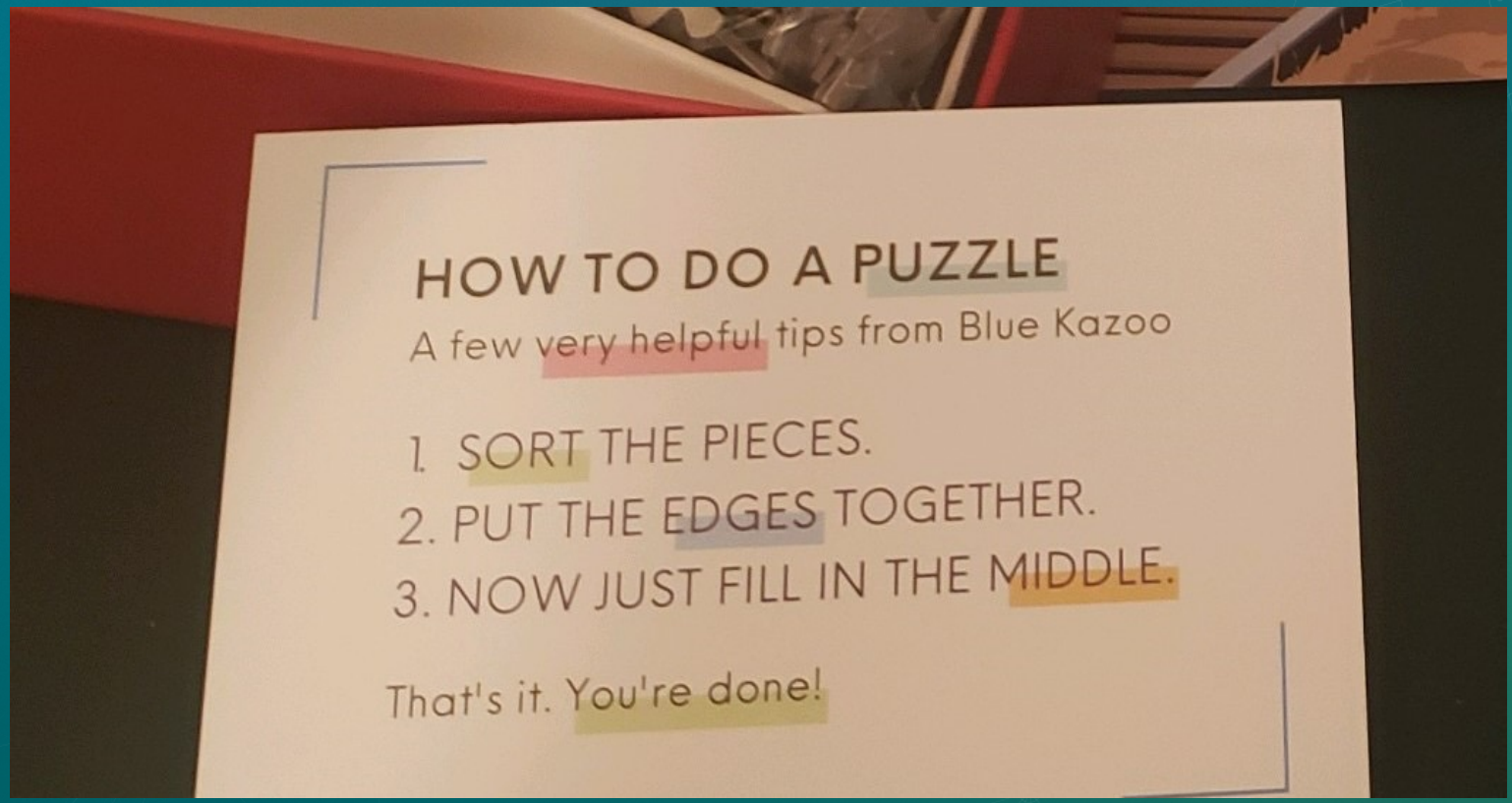
The PCI DSS Program: Take Control of the Controls

Jeni German, Digital Security Analyst
WM

The PCI DSS Program Agenda

The Program Puzzle

- **Introduction**



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The PCI DSS Program Agenda

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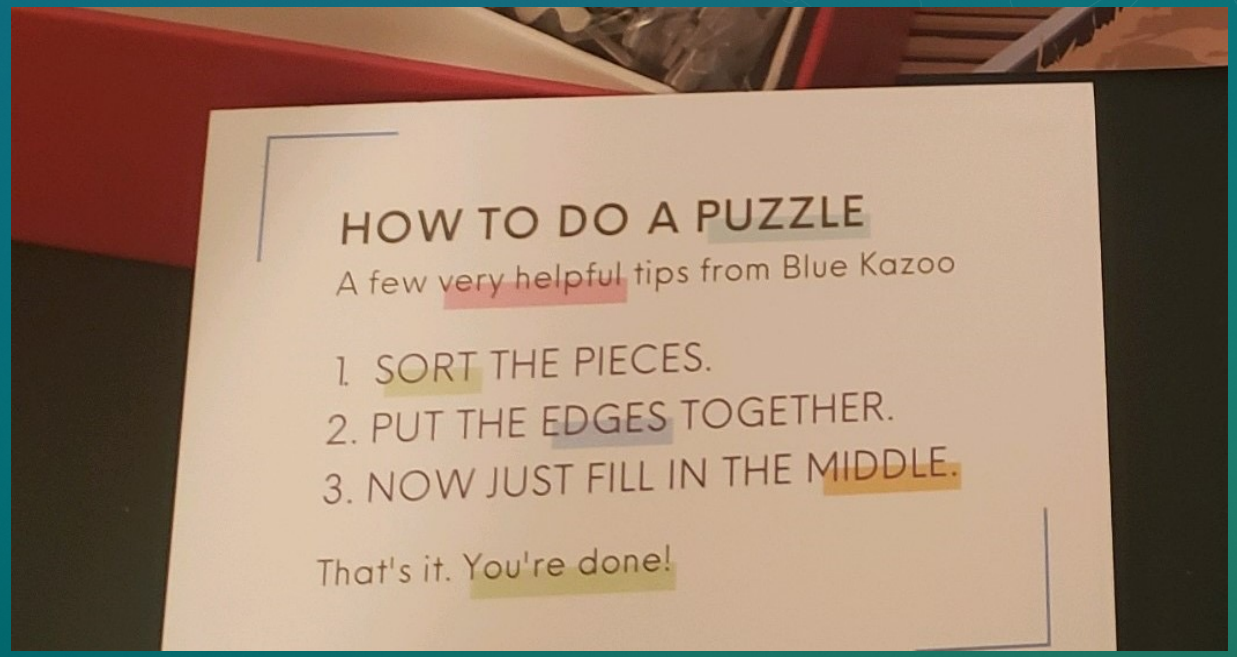
- **Introduction**
- **The Three Things:**
  - **Identify and Utilize the PCI DSS Program Team**



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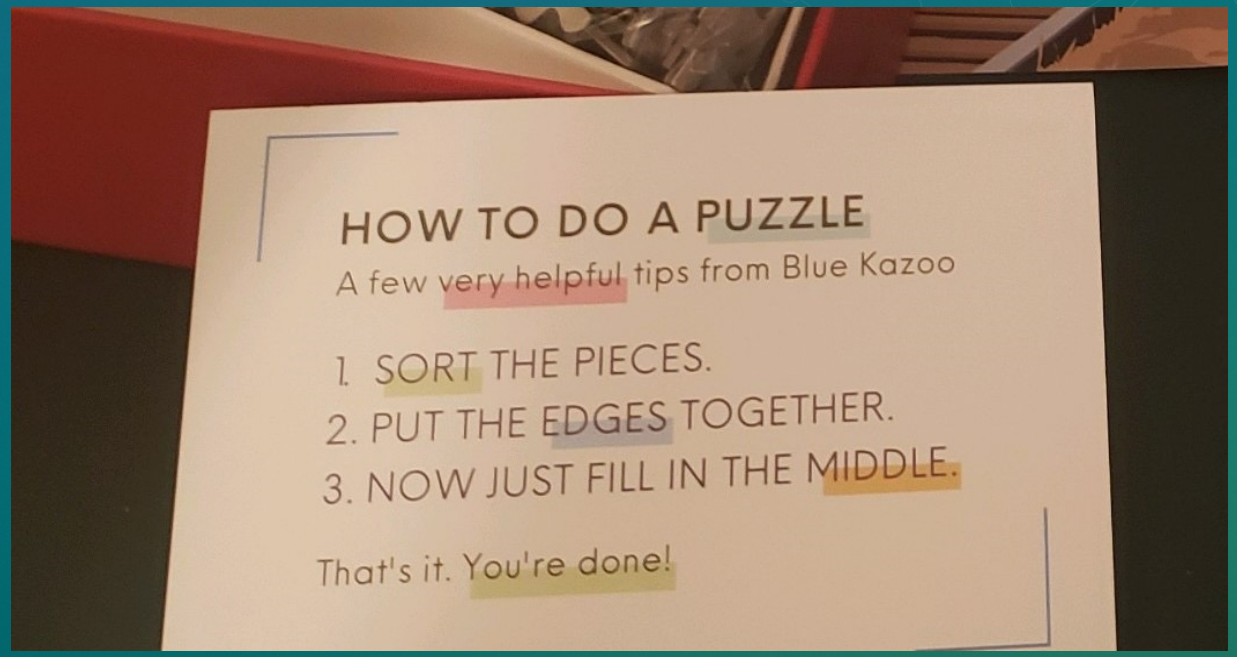
  - **The PCI DSS Program Calendar**



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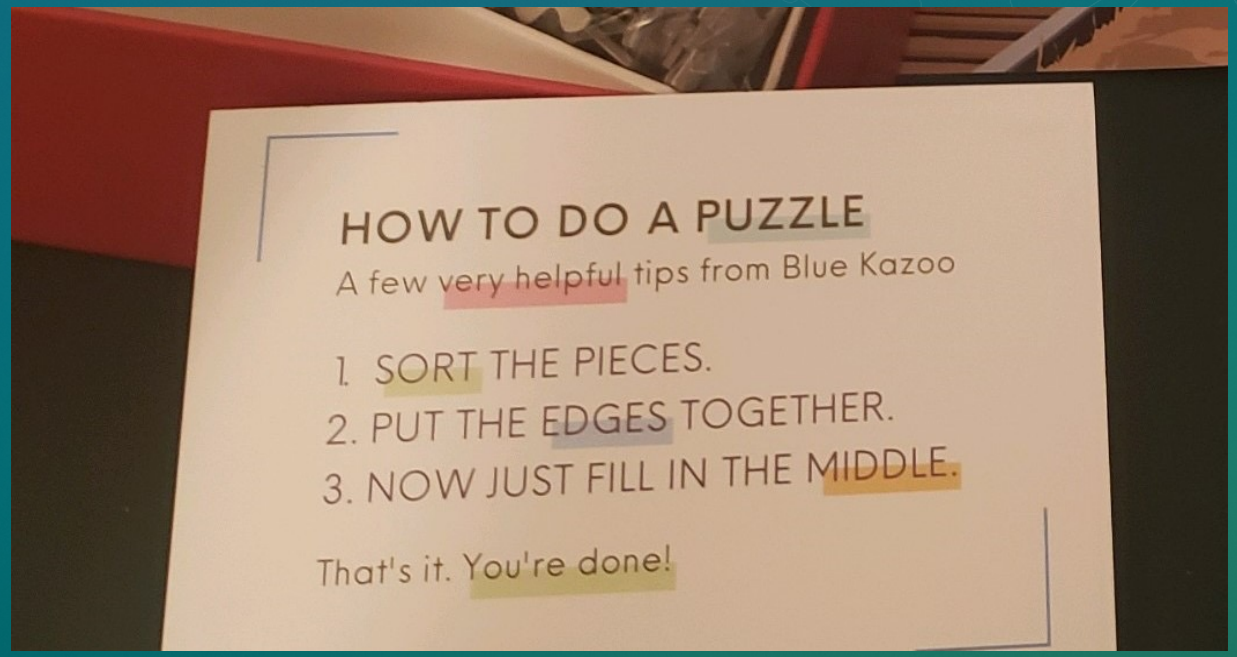
  - **Streamline Evidence Collection**



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The PCI DSS Program Agenda

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- The Three Things:
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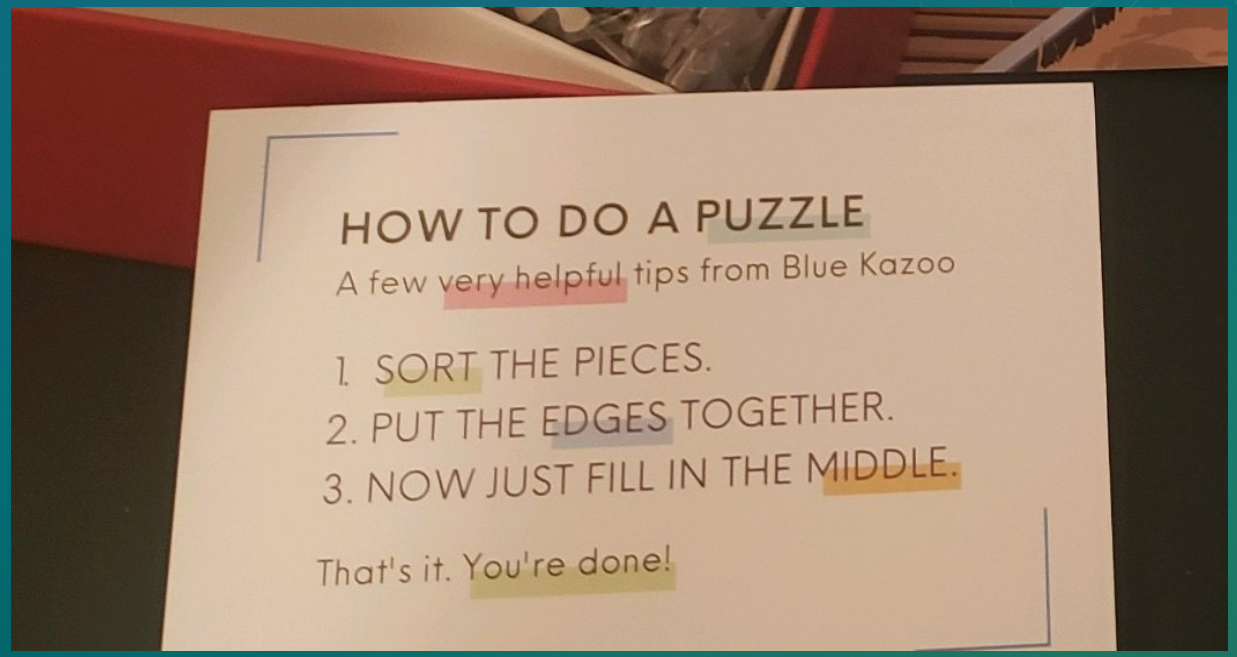
  - The PCI DSS Program Calendar
  - Streamline Evidence Collection
- Take-aways



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The PCI DSS Program
Identify and Utilize the PCI DSS Program Team

Build Out the Edges to Define the Scope

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The PCI DSS Program
Identify and Utilize the PCI DSS Program Team

Build Out the Edges to Define the Scope

- **Define the scope of the Cardholder Data Environment**
  - **CDE = People, Processes and Technology**

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The PCI DSS Program
Identify and Utilize the PCI DSS Program Team

Build Out the Edges to Define the Scope

- **Define the scope of the Cardholder Data Environment**
  - **CDE = People, Processes and Technology**
- **Review controls; assign control owners**

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The PCI DSS Program
Identify and Utilize the PCI DSS Program Team

Build Out the Edges to Define the Scope

- **Define the scope of the Cardholder Data Environment**
  - **CDE = People, Processes and Technology**
- **Review controls; assign control owners**
- **Produce scope documentation**
  - Critical Inventory
  - Network Diagrams
  - Data Flow Diagram

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Identify and Utilize the PCI DSS Program Team

Build Out the Edges to Define the Scope

- **Define the scope of the Cardholder Data Environment**
  - **CDE = People, Processes and Technology**
- **Review controls; assign control owners**
- **Produce scope documentation**
  - Critical Inventory
  - Network Diagrams
  - Data Flow Diagram
- **PCI DSS v4.0 12.5.2 – New scoping requirement**

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The PCI DSS Program
Identify and Utilize the PCI DSS Program Team

Build Out the Edges to Create Structure

- **Identify the PCI DSS Program Team**

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The PCI DSS Program
Identify and Utilize the PCI DSS Program Team

Build Out the Edges to Create Structure

- **Identify the PCI DSS Program Team**
  - **Subject Matter Experts (SMEs)**
    - **Perform controls; can provide evidence**

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The PCI DSS Program
Identify and Utilize the PCI DSS Program Team

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- **Identify the PCI DSS Program Team**
  - **Subject Matter experts**
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  - **Managers**
    - **Can represent multiple SMEs in a process area**
    - **Provides a path of escalation when roadblocks appear**

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- **Identify the PCI DSS Program Team**
  - **Subject Matter experts**
    - **Perform controls; can provide evidence**
  - **Managers**
    - **Can represent multiple SMEs in a process area**
    - **Provides a path of escalation when roadblocks appear**
  - **Business Process Owners; Stakeholders**
    - **High-level decision makers**
    - **Relationship with banks and service providers**

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The PCI DSS Program
Identify and Utilize the PCI DSS Program Team

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- **Using the PCI DSS Program Team**

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- **Using the PCI DSS Program Team**
  - **Align the Team Members**

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The PCI DSS Program
Identify and Utilize the PCI DSS Program Team

Build Out the Edges to Create Structure

- **Using the PCI DSS Program Team**
  - **Align the Team Members**
  - **Keeping folks engaged resourcefully**
    - **Meetings – set up recurring**
      - **Frequent and Optional**
      - **Pre-meeting Agenda**
      - **Post-meeting Notes**

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The PCI DSS Program
Identify and Utilize the PCI DSS Program Team

Build Out the Edges to Create Structure

- **Using the PCI DSS Program Team**
  - **Keep folks engaged resourcefully (cont'd)**
    - **Email - Copy everyone on relevant threads**
    - **Quarterly Business As Usual (BAU) calls to include the assessor**

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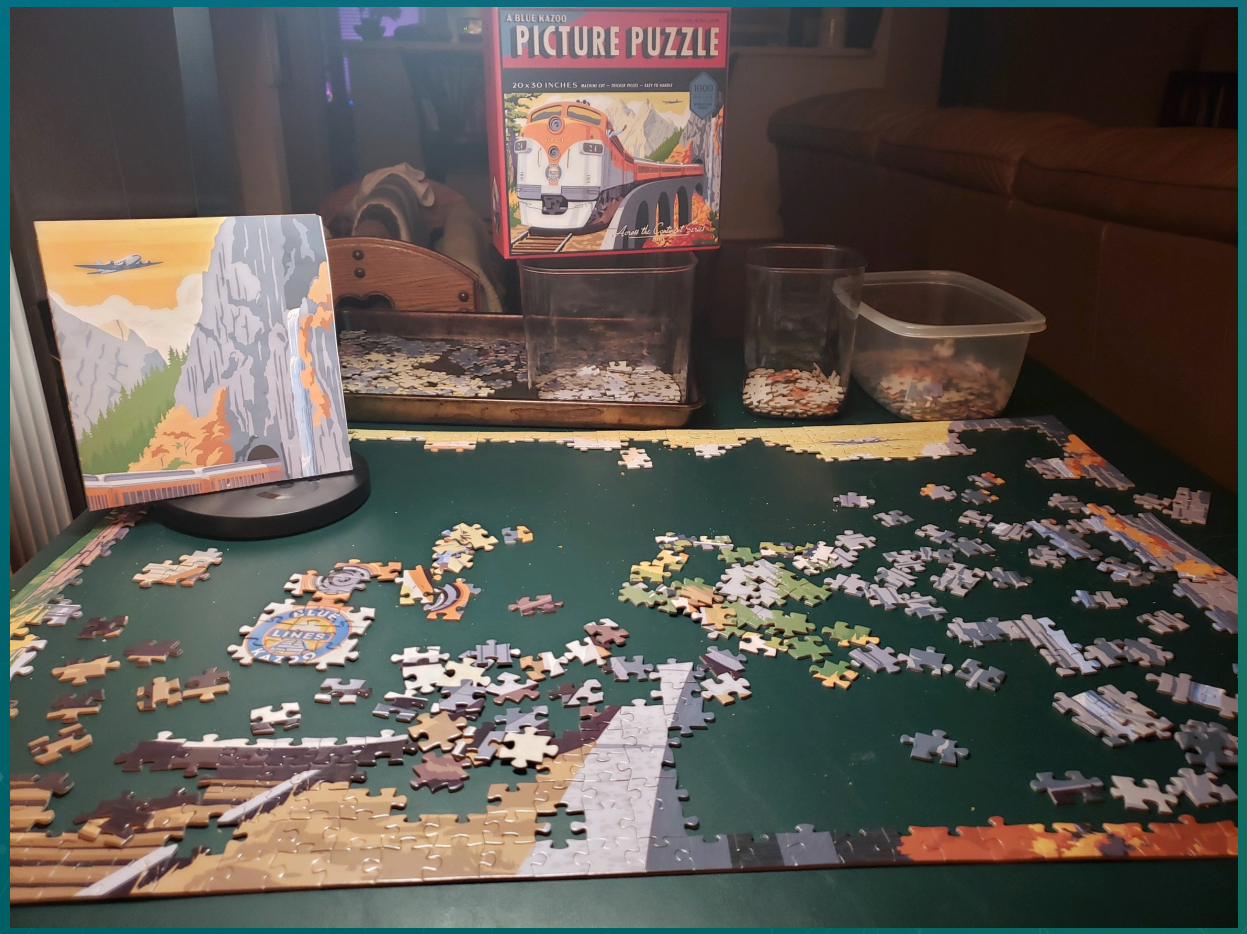
The PCI DSS Program
The Program Calendar

Fill in the Center: Planning and Workflows



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The PCI DSS Program
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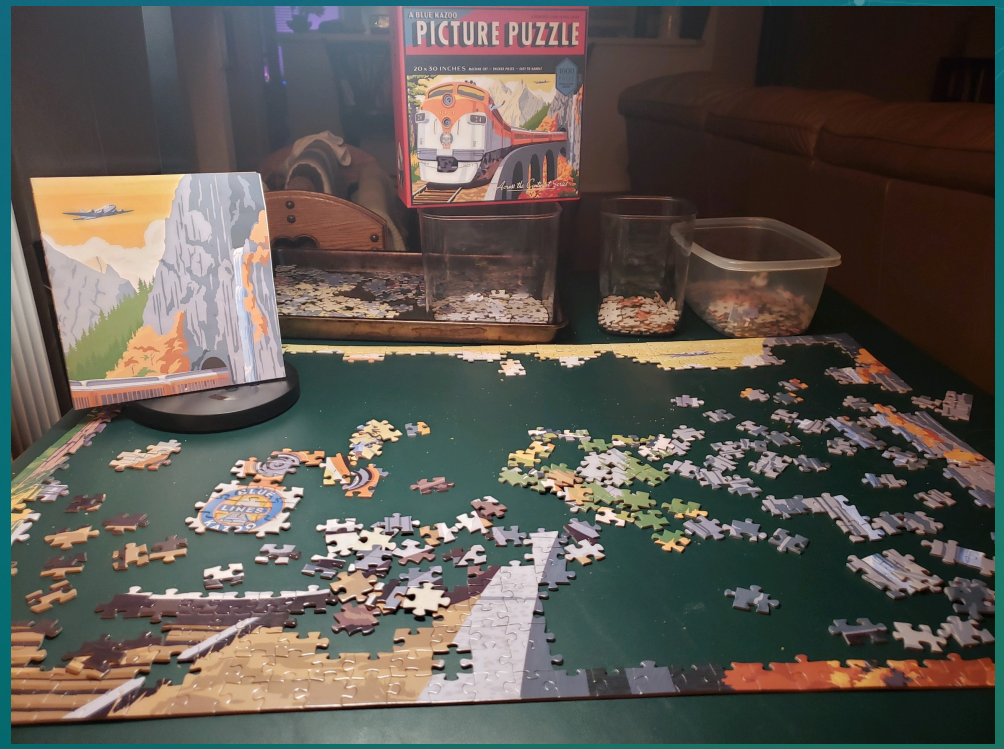
Fill in the Center: Planning and Workflows

- **Annual Tasks and Activities Calendar**



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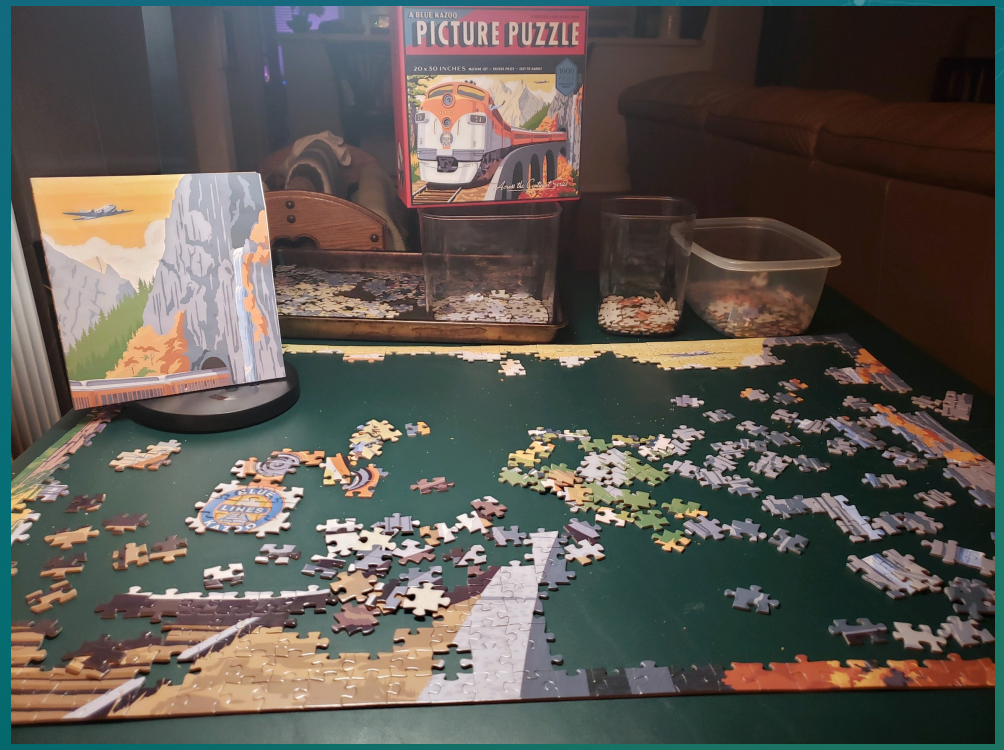
The PCI DSS Program
The Program Calendar

Fill in the Center: Planning and Workflows

- **Annual Tasks and Activities Calendar**
  - **When will Program Team be in place?**
  - **Assessment Timeframe Decided**
    - **Two months within the assessment year.**
    - **Three months if using Third Party assessor**
    - **Consider business requirements and constraints**



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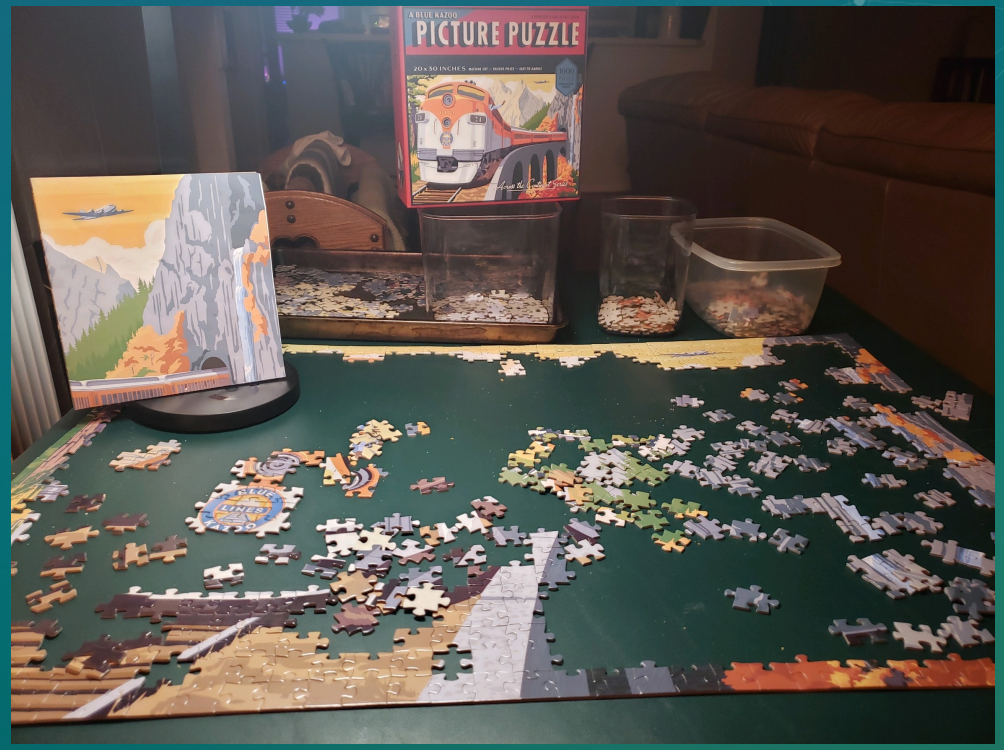
The PCI DSS Program
The Program Calendar

Fill in the Center: Planning and Workflows

- **Annual Tasks and Activities Calendar**
  - **Scoping and documentation complete**
  - **Control Owners assigned**
  - **Dates for Evidence requests and submittal**
  - **Expected completion date**
  - **Attestation of Compliance delivery**



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The PCI DSS Program
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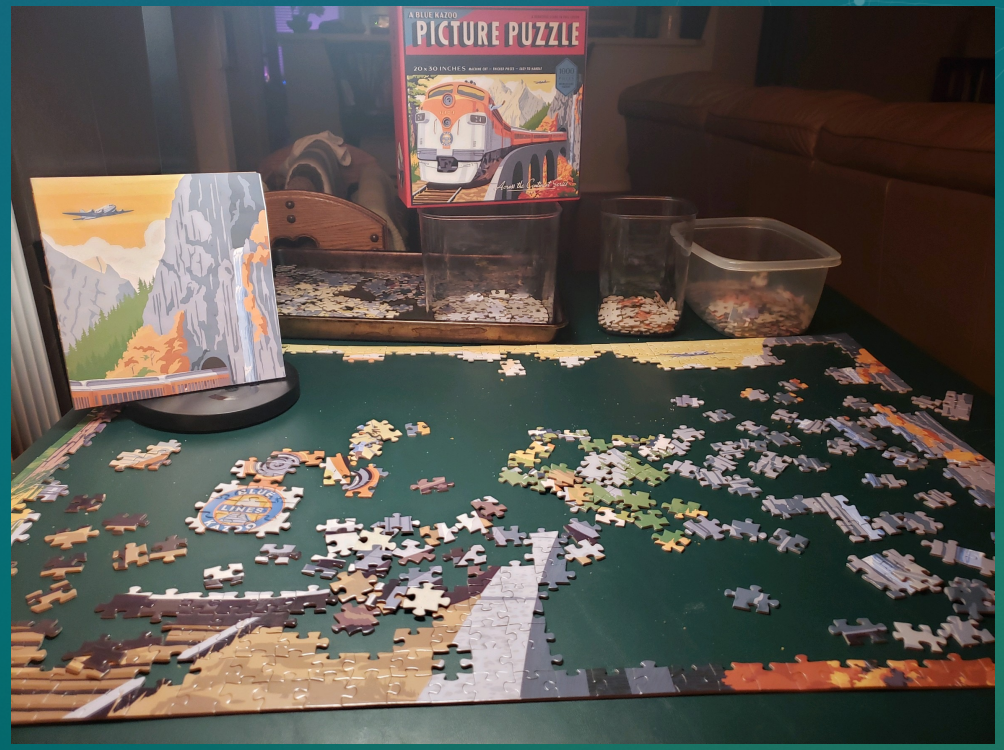
Fill in the Center: Planning and Workflows

- **Annual Tasks and Activities Calendar**
  - **All meetings**
    - **Program Team**
    - **BAU**
    - **Process interviews**
    - **Ad hoc activities**



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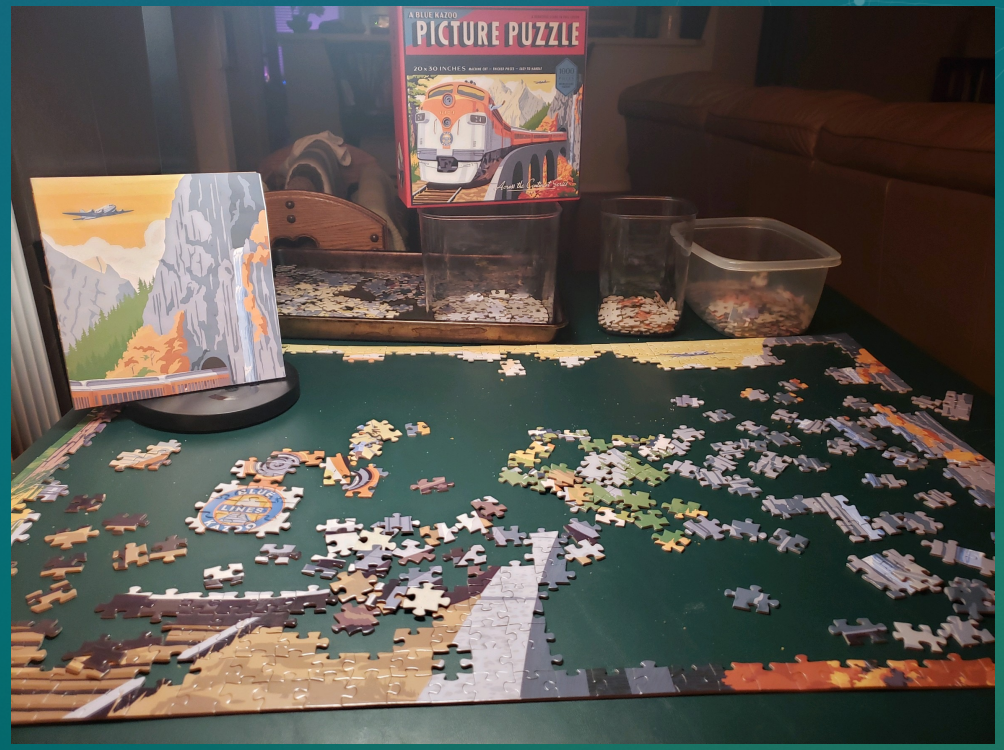
Fill in the Center: Planning and Workflows

- **Annual Tasks and Activities Calendar**
  - **All Annually Recurring Tasks**
    - **Time Sensitive Deliverables**
    - **ASV scans – 90 days;**
    - **Firewall Rule Reviews – six months;**
    - **Penetration Test**



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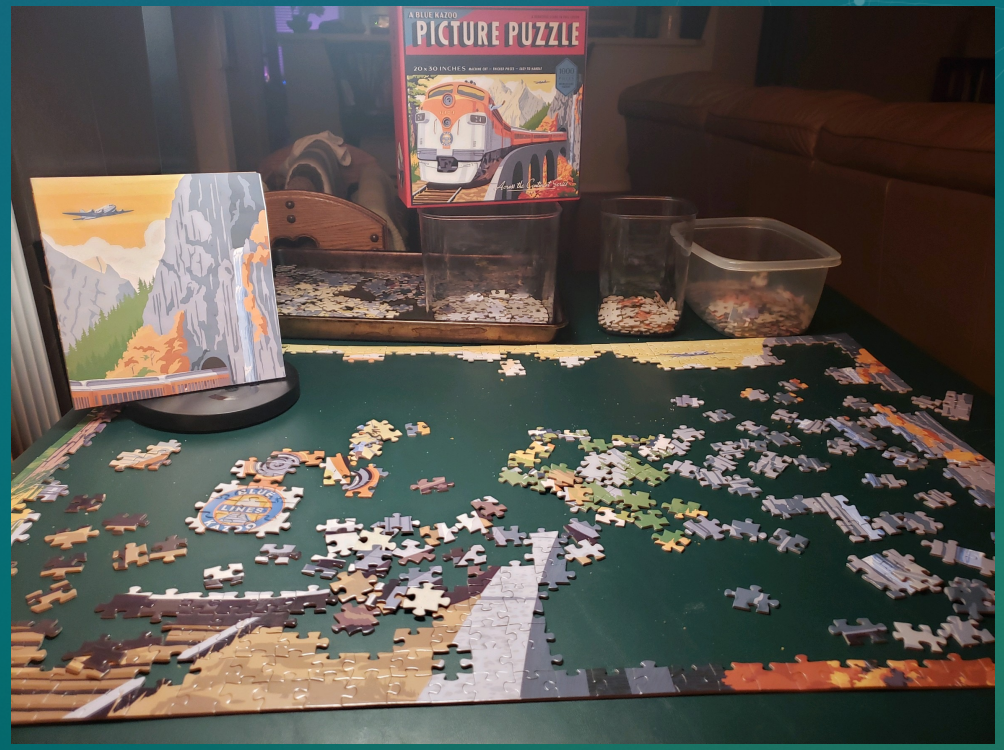

Consider using the v4.0 Timeframes descriptions now!

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The PCI DSS Program Streamline Evidence Sources

The Picture Emerges

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- **Look for ways to integrate processes**
  - **Policy Admin to manage policy lifecycle of all PCI DSS related policies**

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- Look for ways to integrate processes
  - Policy Admin to manage policy lifecycle of PCI DSS related policies
  - PCI Admin
    - To answer requests that do not need an SME.
    - Keep my eyes on things

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The PCI DSS Program Streamline Evidence Sources

The Picture Emerges

- Look for ways to integrate processes
  - Policy Admin to manage policy lifecycle of PCI DSS related policies
  - PCI Admin
    - To answer requests that do not need an SME
    - Keep your eye on things
- All evidence requested should come from a process in place.

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The PCI DSS Program Take-Aways

A Clear High Level and Detailed Picture!

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The PCI DSS Program Take-Aways

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1. **PCI DSS Program is not a one-person show.**

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The PCI DSS Program Take-Aways

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2. **Timing is critical!**

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The PCI DSS Program Take-Aways

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1. **PCI DSS Program is not a one-person show.**
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3. **Functional roles might streamline evidence collection**

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The PCI DSS Program Take-Aways

A Clear High Level and Detailed Picture!

1. **PCI DSS Program is not a one-person show.**
2. **Timing is critical!**
3. **Functional roles might streamline evidence collection**

Bonus Takeaway:

If a requirement cannot be answered, if a control is not in place, that could point to a gap in the security defenses. Drive the fix.

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