Prioritized Approach for PCI DSS 1.2

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Jennifer Mack, PCI SSC Marketing Working Group chair
Agenda

- Introductions
- New resource – Prioritized Approach
- Standards Training
- Q&A
PCI DSS Prioritized Approach

**What is it?**

- Guidance for organizations to prioritize their PCI DSS implementation efforts

**What are the benefits?**

- Provides a roadmap that an organization can use to address risks in priority order

- Enables merchants, of any size, to demonstrate progress on PCI DSS compliance process to key stakeholders – banks, acquirers, QSAs and others

- Promotes objective and measurable progress indicators
PCI DSS Prioritized Approach

How was it created?

• Payment brands’ examination of account data compromise events

• Feedback from PCI SSC Board of Advisors, Council leadership and the Technical Working Group

• Feedback from several QSAs and forensics investigators
  – Asked to identify the top 15 PCI DSS requirements for protecting cardholder data
Objectives of Prioritized Approach

- Prioritize efforts based on the risk associated with handling cardholder data
  - Security efforts can first focus on certain PCI DSS requirements

- Reduce risk associated with account data compromise by:
  - Not retaining magnetic stripe data
  - Minimize and secure storage of PAN
  - Using network segmentation to reduce scope
The Prioritized Approach can

• Help merchants know where to start with PCI DSS compliance

• Prompt merchants to consider a risk based approach when evaluating their PCI DSS implementation timelines and budgets

• Facilitate discussion between a merchant and stakeholders on progress with PCI DSS
The Prioritized Approach does not

- Provide a short cut to compliance with PCI DSS 1.2
- Assume a one size fits all approach for every organization
- Replace PCI DSS 1.2
PCI DSS Prioritized Approach

Prioritized Approach

Tools

Reference Guide

PCI DSS Requirements

<table>
<thead>
<tr>
<th>Requirement 1: Install and maintain a firewall configuration to protect cardholder data</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 Establish firewall and router configuration standards that include the following:</td>
</tr>
<tr>
<td>1.1.1 A formal process for approving and testing all network connections and changes to the firewall and router configurations</td>
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<tr>
<td>1.1.2 Current network diagram with all connections to cardholder data, including any wireless networks</td>
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<tr>
<td>1.1.3 Requirements for a firewall at each Internet connection and between any demilitarized zone (DMZ) and the internal network zone</td>
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<td>1.1.4 Description of groups, roles, and responsibilities for logical management of network components</td>
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<td>1.1.5 Documentation and business justification for use of all services, protocols, and ports allowed, including documentation of security features implemented for those protocols considered to be insecure</td>
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<tr>
<td>1.1.6 Requirement to review firewall and router rule sets at least every six months</td>
</tr>
<tr>
<td>1.2 Build a firewall configuration that restricts connections between untrusted networks and any system components in the cardholder data environment</td>
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<tr>
<td>1.2.1 Restrict inbound and outbound traffic to that which is necessary for the cardholder data environment</td>
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</tbody>
</table>

Milestones for Prioritizing PCI DSS Compliance Efforts

The Prioritized Approach includes six milestones. The matrix below summarizes high-level goals and intentions of each milestone. The rest of this document describes the milestones to each of all twelve PCI DSS requirements and their sub-requirements.

<table>
<thead>
<tr>
<th>Milestone</th>
<th>Goals</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>Remove sensitive authentication data and limit data retention. Milestone targets a key area of risk for entities that have been or could be affected by a breach with sensitive authentication data and data that is cardholder data. If you don’t store it, don’t store it.</td>
</tr>
<tr>
<td>2</td>
<td>Protect the perimeter, internal, and wireless networks. This is a key milestone targeting the risks to cardholder data.</td>
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<tr>
<td>3</td>
<td>Secure payment card applications. This milestone targets the areas that are lowest in risk, including authentication data, and data that is cardholder data.</td>
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<tr>
<td>4</td>
<td>Monitor and control access to your systems. Controls for this allow you to detect the who, what, when, and how concerning access your network and cardholder data environment.</td>
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<tr>
<td>5</td>
<td>Prevent cardholder data. For those organizations that have analyzed their business processes and determined that they must store Primary Account Numbers, Milestone Five targets key protection mechanisms for stored data.</td>
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<tr>
<td>6</td>
<td>Finalize all policies, procedures, and processes to support maintenance of PCI DSS compliance. The intent of Milestone 6 is to complete PCI DSS requirements, and to finalize all remaining policies, procedures, and processes needed to protect the cardholder data environment. The milestone also includes completion of firewall configuration standards, change control procedures, securing audit trails, and network testing processes.</td>
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Milestone | 1 | 2 | 3 | 4 | 5 | 6 |
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# PCI DSS Prioritized Approach

## Prioritized Approach Tools

### Worksheet & Attestation of Compliance

### Prioritized Approach Summary & Attestation of Compliance

<table>
<thead>
<tr>
<th>Milestone</th>
<th>Task</th>
<th>Percent Complete</th>
<th>Estimated Time for Completion</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Remove remote access and limit access to the cardholder data to that which is necessary for business purposes</td>
<td>0%</td>
<td>0.00</td>
</tr>
<tr>
<td>2</td>
<td>Prevent unauthorized access to the cardholder data</td>
<td>0%</td>
<td>0.00</td>
</tr>
<tr>
<td>3</td>
<td>Secure cardholder data</td>
<td>0%</td>
<td>0.00</td>
</tr>
<tr>
<td>4</td>
<td>Prevent cardholder data from being altered or deleted</td>
<td>0%</td>
<td>0.00</td>
</tr>
<tr>
<td>5</td>
<td>Ensure cardholder data is protected from unauthorized access, alteration, disclosure, or destruction</td>
<td>0%</td>
<td>0.00</td>
</tr>
<tr>
<td>6</td>
<td>Ensure cardholder data is protected from unauthorized access, alteration, disclosure, or destruction</td>
<td>0%</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**Overall**

**Estimated Time for Completion**

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**Execution Officer**

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**Part 6: Merchant or Service Provider Acknowledgements**

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**Part 5: Target Date for Achieving Full PCI DSS Compliance**

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Six Security Milestones
PCI DSS Prioritized Approach

**Milestone One - If you don’t need it, don’t store it.**

The intent of Milestone One is to remove sensitive authentication data and limit data retention. This milestone targets a key area of risk for entities that have been compromised – if sensitive authentication data and other cardholder data had not been stored, the effects of the compromise would have been greatly reduced.

**Milestone Two - Secure the perimeter.**

The intent of Milestone Two is to protect the perimeter, internal, and wireless networks. This milestone targets a key area that represents the point of access for most compromises: vulnerabilities in networks or at wireless access points.
Milestone Three - Secure applications.

The intent of Milestone Three is to secure applications. This milestone focuses on applications, as well as application processes and application servers, since application weaknesses are a key access point used to compromise systems and obtain access to cardholder data.

Milestone Four - Control access to your systems.

The intent of Milestone Four is to protect the cardholder data environment through monitoring and access control since this is the key method to detect the who, what, when and how about who is accessing your network.
Milestone Five - Protect stored cardholder data.

For those organizations that have analyzed their business processes and determined that they must store Primary Account Numbers, Milestone Five targets key protection mechanisms for that stored data.

Milestone Six - Finalize remaining compliance efforts, and ensure all controls are in place.

The intent of Milestone Six is to complete PCI DSS requirements and finalize all remaining related policies, procedures, and processes needed to protect the cardholder data environment.
Important Note and Disclaimer

• In order to achieve PCI DSS compliance, **ALL** PCI DSS requirements must be successfully implemented, regardless of the order in which they are satisfied or whether the organization seeking compliance follows the PCI DSS Prioritized Approach. The Prioritized Approach does not, and is not intended in any manner to, modify or abridge the PCI DSS or any of its requirements.

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First PCI SSC Standards Training

**Merchant training offered directly by PCI SSC**

- **Objective:** Arm merchants with everything they need to know to best prepare for an onsite PCI DSS assessment or to perform the assessment internally.

- **Focus:** Four key modules
  - PCI Program – defining the payment card industry
  - Scoping a PCI DSS Assessment
  - PCI DSS v1.2 Requirements
  - Compensating Controls

- **Where:** Chicago on April 6-7, 2009
  - Check PCI SSC Website for additional locations and dates
Thank You!

Question & Answer Session