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Manager, Data Security Standards

All About INFI

PCI Security Standards Council

Compensating Controls (CCs)

"Intended to help entities address the risk when there is a **technical** or **business** constraint that prevents meeting the PCI DSS requirement as stated"

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Compensating Controls (CCs)

- Proactive
- Known business or technical constraint
- Cannot meet the requirement as stated
- Typically documented by the entity being assessed

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Business convenience to please the customers is not a "constraint"

Poor planning is not a valid reason for use of a Compensating Control

Compensating Controls cannot be used with the Customized Approach

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Clean Air Requirement

Staff members must cycle to and from work 5 days each week to limit air pollution

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Clean Air Requirement

- **Fictitious Example**
  - Staff members must cycle to and from work 5 days each week to limit air pollution

- **In Place – Requirement met**
  - The staff member has been cycling to work continuously,
    5 days a week, as evidenced by a recorded travel diary

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Clean Air Requirement

- **Fictitious Example**
  - Staff members must cycle to and from work 5 days each week to limit air pollution

- **Not In Place – Requirement is not met**
  - The staff member has not cycled to work and has used their personal quad bike instead

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Clean Air Requirement

- **Fictitious Example**
  - Staff members must cycle to and from work 5 days each week to limit air pollution
- **In Place with Compensating Control**
  - The company provides a shuttle bus in bad weather

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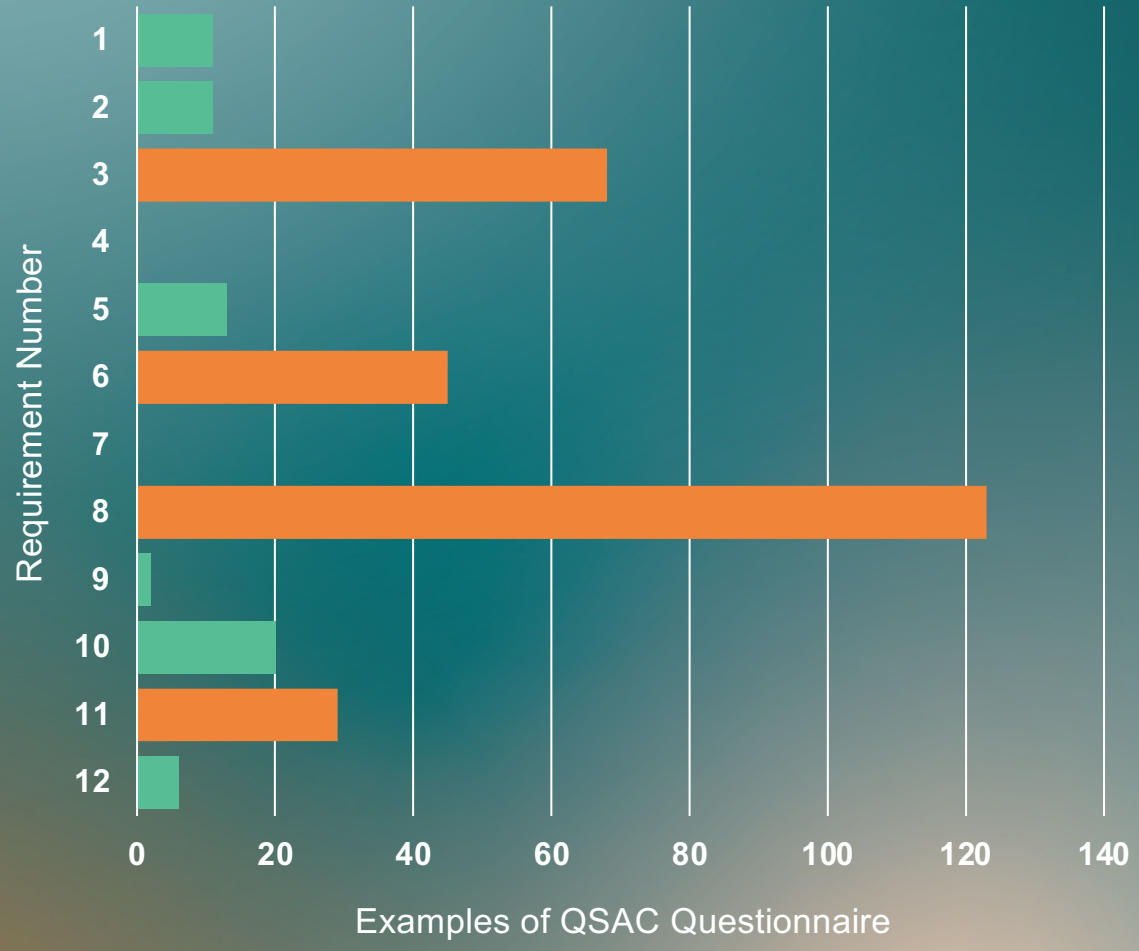
Compensating Controls (CCs)



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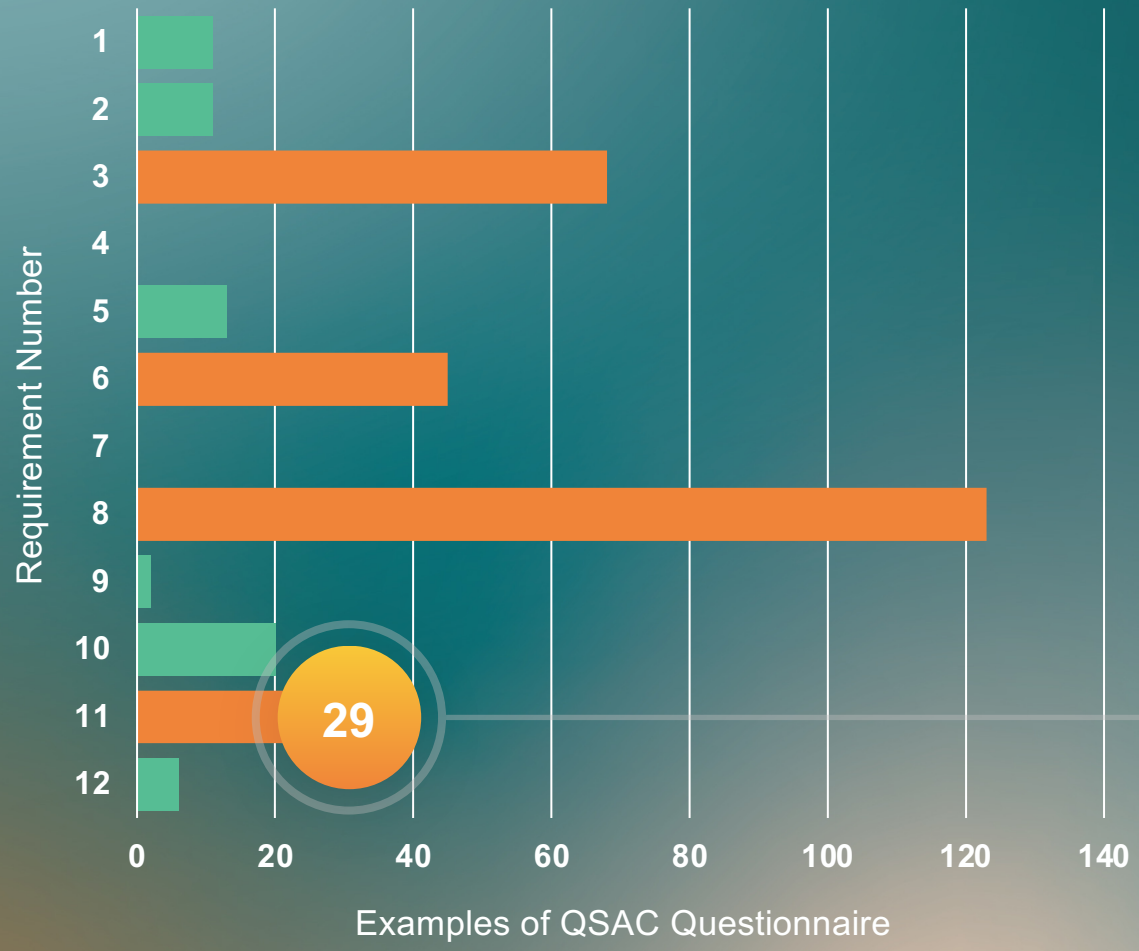
Compensating Controls (CCs)



Regularly Test Security Systems And Processes

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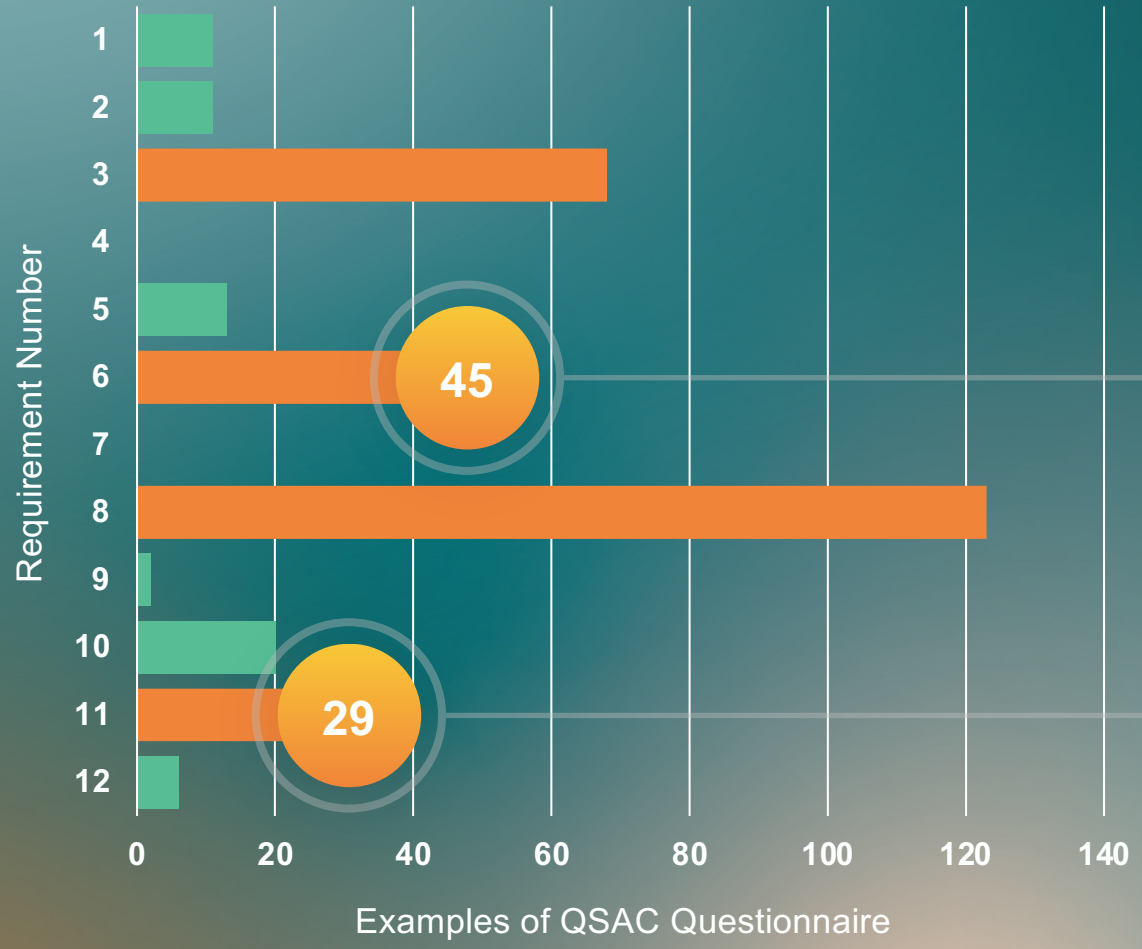

Develop And Maintain Secure Systems And Applications

Regularly Test Security Systems And Processes

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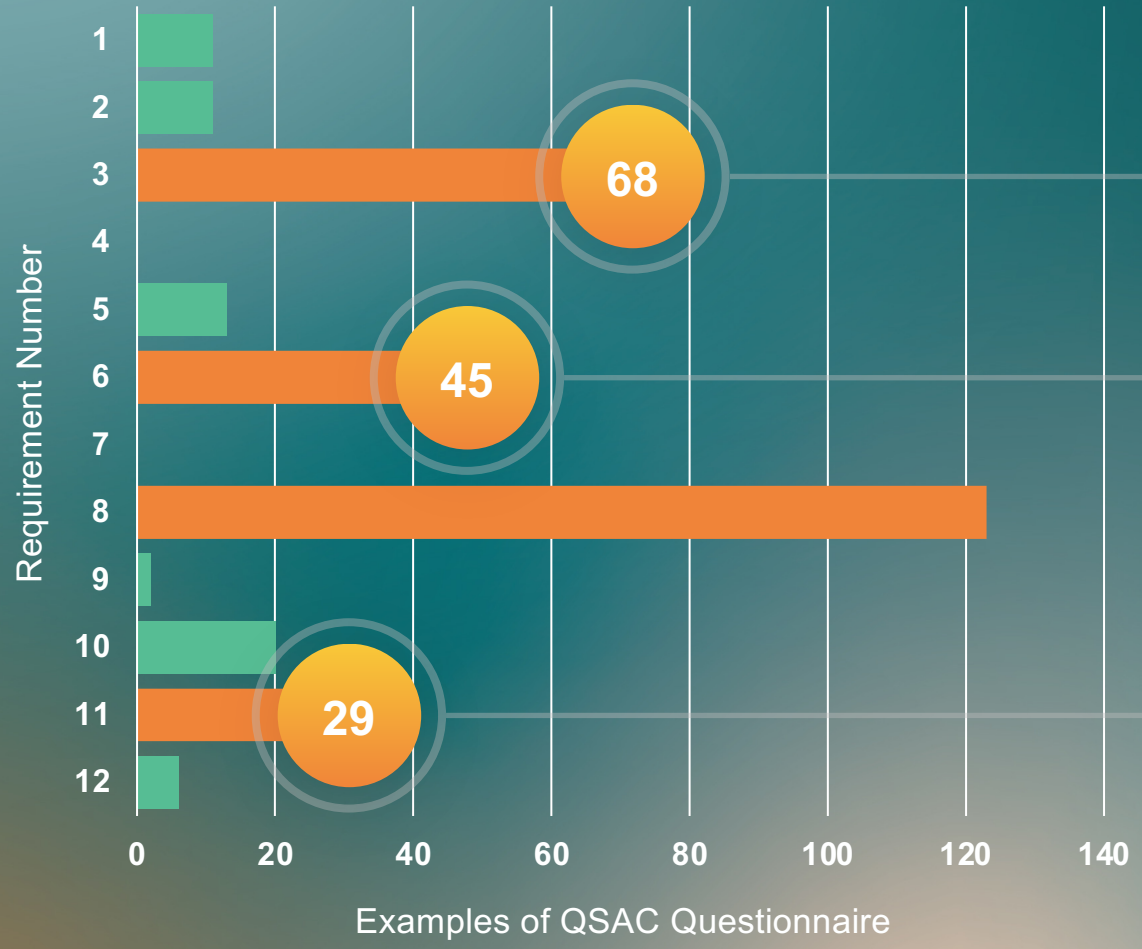

- Protect Stored Cardholder Data
- Develop And Maintain Secure Systems And Applications
- Regularly Test Security Systems And Processes

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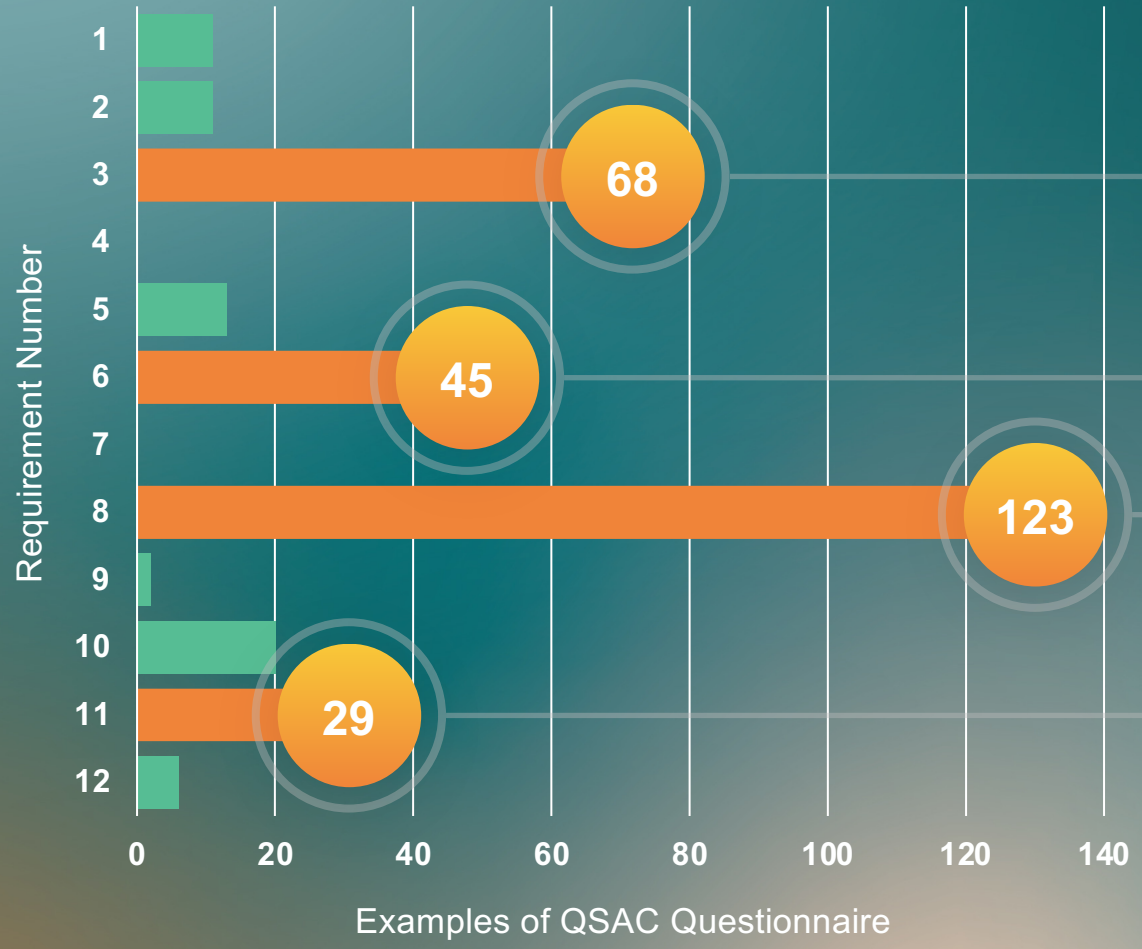

- Protect Stored Cardholder Data
- Develop And Maintain Secure Systems And Applications
- Identify And Authenticate Access To System Components
- Regularly Test Security Systems And Processes

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Items Noted For Improvement (INFI)

"For internal use between the assessor and the assessed entity when a PCI DSS requirement was not initially met, but where the entity has taken steps to address the failure and ensure that the **requirement is met** going forward."

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Items Noted For Improvement (INFI)

- Reactive
- Lapse in control due to unforeseen or exceptional circumstance
- Has addressed cause of control lapse; requirement is now in place

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Items Noted For Improvement (INFI)

- **Fictitious Example**
  - Staff members must cycle to and from work 5 days each week to limit air pollution

- **Compliant – with Items Noted For Improvement**
  - Following a puncture, a staff member could not cycle to work
  - The staff member subsequently bought a puncture repair kit

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What if There Is a Legal Exception?
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Legal Exception

- **Where a legal exception means that the requirement(s) cannot be met:**

☐	**Compliant but with Legal exception:** One or more assessed requirements in the ROC are marked as Not in Place due to a legal restriction that prevents the requirement from being met and all other assessed requirements are marked as being either In Place or Not Applicable, resulting in an overall **COMPLIANT BUT WITH LEGAL EXCEPTION** rating; thereby *(Merchant Company Name)* has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above or as Not in Place due to a legal restriction. This option requires additional review from the entity to which this AOC will be submitted. *If selected, complete the following:*

Affected Requirement	Details of how legal constraint prevents requirement from being met

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An Example Using a PCI DSS Requirement

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An Example Using a PCI DSS Requirement

PCI DSS v4.0 - DEFINED APPROACH REQUIREMENTS

11.3.2 External vulnerability scans are performed as follows:

- At least once every three months.
- By a PCI SSC Approved Scanning Vendor (ASV).
- Vulnerabilities are resolved and *ASV Program Guide* requirements for a passing scan are met.
- Rescans are performed as needed to confirm that vulnerabilities are resolved per the *ASV Program Guide* requirements for a passing scan.

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Which One Do I Use When?

- **Compensating Control (CC)**
  - Proactive
  - Known business or technical constraint
  - Cannot meet the requirement; alternative controls implemented

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Which One Do I Use When?

- **Items Noted for Improvement (INFI)**
  - Reactive
  - Lapse in control due to unforeseen or exceptional circumstance
  - Has addressed cause of control lapse; requirement is now in place

Temporarily "Not In Place" but fixed and future-proofed

Poor planning is not a valid reason for the use of INFI

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Which One Do I Use When?

- **Requirement: 11.3.2**
  - **In Place**
    The entity can evidence a passing scan at least once every three months
  - **Not In Place**
    The entity cannot evidence a passing scan at least once every three months

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Which One Do I Use When?

- **Requirement: 11.3.2 - Examples**

  In Place with Compensating Control

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Which One Do I Use When?

- **Requirement: 11.3.2 - Examples**

  In Place with Compensating Control

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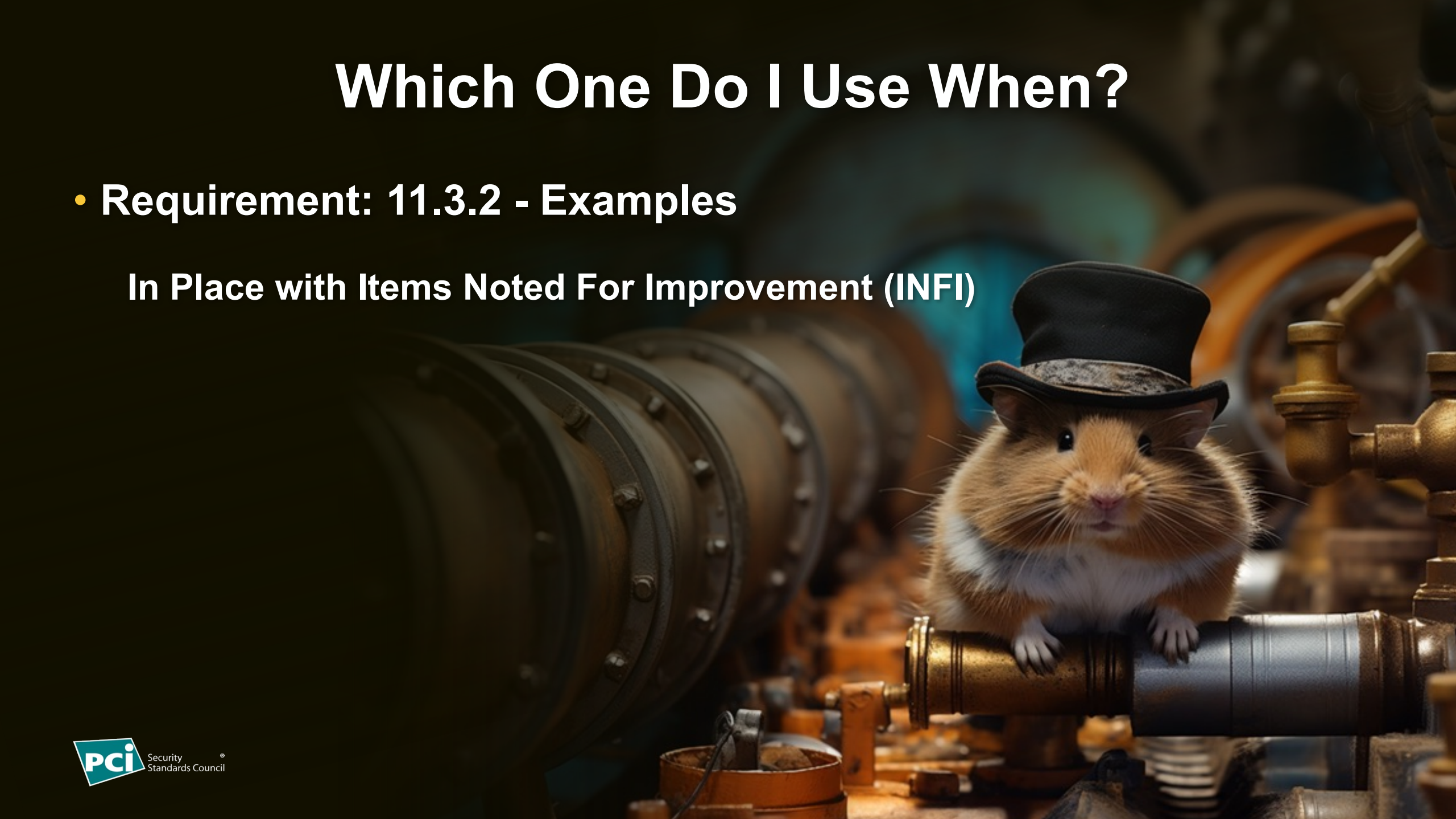
Which One Do I Use When?

- **Requirement: 11.3.2 - Examples**

  In Place with Items Noted For Improvement (INFI)



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Common INFI Questions

- Will PCI SSC provide an INFI template?

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- SAQs?
- ISAs?
- Use with v3.2.1?

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