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Obey the law



Corporate directors can be individually liable if company does not have an adequate reporting system or controls or fail to monitor reporting system





























	800 and req TABLE 1: SECURITY CONTRO	-53 c com uirer	defines the controls apliance ments	
	Access Control	MP	Media Protection	
AC		_	Distribution of English and Distribution	
AC AT	Awareness and Training	PE	Physical and Environmental Protection	
AC AT AU	Awareness and Training Audit and Accountability	PE	Physical and Environmental Protection Planning	
AC AT AU CA	Awareness and Training Audit and Accountability Security Assessment and Authorization	PE PL PS	Physical and Environmental Protection Planning Personnel Security	
AC AT AU CA CM	Awareness and Training Awareness and Training Audit and Accountability Security Assessment and Authorization Configuration Management	PE PL PS RA	Physical and Environmental Protection Planning Personnel Security Risk Assessment	
AC AT AU CA CM CP	Awareness and Training Awareness and Training Audit and Accountability Security Assessment and Authorization Configuration Management Configuration Management	PE PL PS RA SA	Physical and Environmental Protection Planning Personnel Security Risk Assessment System and Services Acquisition	
AC AT AU CA CM CP IA	Awareness and Training Audit and Accountability Security Assessment and Authorization Configuency Planning Identification and Authentication	PE PL PS RA SA SC	Prigracia and Environmental Protection Planning Personnel Security Risk Assessment System and Services Acquisition System and Communications Protection	
AC AT AU CA CM CP IA IR	Austransa and Training Audit and Accountability Security Assessment and Authorization Configuration Management Configuration Management Identification and Authentication Incident Response	PE PL PS RA SA SC SI	Projecta and Environmental Protection Planning Personnel Security Risk Assessment System and Services Acquisition System and Communications Protection System and Information Integrity	

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NO.	CONTROL NAME	5			INITIAL CONTROL BASELINES		
	CONTROL NAME	PRK	LOW	MOD	HIGH		
	Ac	cess Con	trol				
AC-1	Access Control Policy and Procedures	P1	AC-1	AC-1	AC-1		
AC-2	Account Management	P1	AC-2	AC-2 (1) (2) (3) (4)	AC-2 (1) (2) (3 (4) (5) (11) (12 (13)		
AC-3	Access Enforcement	P1	AC-3	AC-3	AC-3		
AC-4	Information Flow Enforcement	P1	Not Selected	AC-4	AC-4		
AC-5	Separation of Duties	P1	Not Selected	AC-5	AC-5		
AC-6	Least Privilege	P1	Not Selected	AC-6 (1) (2) (5) (9) (10)	AC-6 (1) (2) (3 (5) (9) (10)		
AC-7	Unsuccessful Logon Attempts	P2	AC-7	AC-7	AC-7		
AC-8	System Use Notification	P1	AC-8	AC-8	AC-8		
AC-5 AC-6 AC-7 AC-8	Separation of Duties Least Privilege Unsuccessful Logon Attempts System Use Notification	P1 P1 P2 P1	Not Selected Not Selected AC-7 AC-8	AC-5 AC-6 (1) (2) (5) (9) (10) AC-7 AC-8	~		







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Challenges with credit cards













Description
Card-not-present merchants (e-commerce or malifielephone-order) that have fully outsourced all cardholder data functions to PCI DSS validated third-party service providers, with no electronic storage, processing, or transmission of any cardholder data on the merchant's systems or premises. Not applicable to face-to-face channels.
E-commerce merchants who outsource all payment processing to PCI DSS validated third parties, and who have a website(s) that doesn't directly receive cardholder data but that can inpact the socurity of the payment transaction. No electronic storage, processing, or transmission of any cardholder data on the merchant's systems or premises. <i>Applicable only to e-commerce channels</i> .
Merchants using only: • Imprint machines with no electronic cardholder data storage; and/or • Standalone, dial-out terminals with no electronic cardholder data storage. Not applicable to e-commerce channels.
Merchants using only standalone, PTS-approved payment terminals with an IP connection to the payment processor, with no electronic cardholder data storage. Not applicable to e-commerce channels.



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	Different SAQs, contd.				
	SAQ	Description			
	C-VT	Merchants who manually enter a single transaction at a time via a keyboard into an Internet-based virtual terminal solution that is provided and hosted by a PCI DSS validated third-party service provider. No electronic cardholder data storage. Not applicable to e-commerce channels.			
	с	Merchants with payment application systems connected to the Internet, no electronic cardholder data storage. Not applicable to e-commerce channels.			
	P2PE-HW	Merchants using only hardware payment terminals that are included in and managed via a validated, PCI SSC-listed P2PE solution, with no electronic cardholder data storage. Not applicable to e-commerce channels.			
	D	SAQ D for Merchants: All merchants not included in descriptions for the above SAQ types.			
		SAQ D for Service Providers: All service providers defined by a payment brand as eligible to complete a SAQ.			
		From "Understanding the SAQs for PCIDSS version 3			
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PCI DSS scope SCOPE

TECHNOLOGY

PEOPLE and PROCESSES

Systems that Connect roothil Systems Systems Systems that providing that impact that impact provide Security CDE security

The PCI DSS security requirements apply to all system components included in or connected to the cardholder data environment. The cardholder data environment (CDE) is comprised of people, processes and technologies that store, process, or transmit cardholder data or sensitive authentication data. "System components" include network devices, servers, computing devices, and applications.







PCI DSS overview				
 12 requirements, specific controls for each 				
Technical controls are not always the right solution				
PCI	Data Security Standard – High Level Overview			
Build and Maintain a Secure Network and Systems	Install and maintain a firewall configuration to protect cardholder data Do not use vendor-supplied defaults for system passwords and other security parameters			
Protect Cardholder Data	Protect stored cardholder data Encrypt transmission of cardholder data across open, public networks			
Maintain a Vulnerability Management Program	 Protect all systems against malware and regularly update anti-virus software or programs Develop and maintain secure systems and applications 			
Implement Strong Access Control Measures	 Restrict access to cardholder data by business need to know Identify and authenticate access to system components Restrict physical access to cardholder data 			
Regularly Monitor and Test Networks	10. Track and monitor all access to network resources and cardholder data 11. Regularly test security systems and processes			
Maintain an Information Security Policy	12. Maintain a policy that addresses information security for all personnel			
From *Requirer	nents and security assessment procedures version 3.1"			
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Requirement 9



Requirement 9, contd.



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Protect devices that capture payment card data via direct physical interaction with the card from tampering and substitution. Have policies and procedures to ensure the above is done

Requirement 10 • Track and monitor all access 旦 Eile Edit View Hel dbus-daenon: Re (RON[5360]: pam sudo: pam_unix(sudo: ramesh su[5571]: Sacce su[5576]: pam_u su[5766]: pam_a su[5766]: PAILE su[5766]: PAILE su[5767]: Sacce Xorg.0.log auth.log auth.log.0 to network resources and cardholder data boot bootstrap.log Implement audit trails (logs) to link all access to system components to each individual user and send them to a protected server Secure the logs so they cannot be altered Review logs and security events for all system components to identify anomalies or suspicious activity Copyright © Scott Bradner & Ben Gaucherin 2016 20

















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