

# Payment Card Industry (PCI) Data Security Standard Self-Assessment Questionnaire D and Attestation of Compliance

## All other SAQ-Eligible Merchants and Service Providers

Version 2.0

October 2010



#### **Document Changes**

Date	Version	Description
October 1, 2008	1.2	To align content with new PCI DSS v1.2 and to implement minor changes noted since original v1.1.
October 28, 2010	2.0	To align content with new PCI DSS v2.0 requirements and testing procedures.



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#### **PCI Data Security Standard: Related Documents**

The following documents were created to assist merchants and service providers in understanding the PCI Data Security Standard (PCI DSS) and the PCI DSS SAQ.

Document	Audience
PCI Data Security Standard: Requirements and Security Assessment Procedures	All merchants and service providers
Navigating PCI DSS: Understanding the Intent of the Requirements	All merchants and service providers
PCI Data Security Standard: Self-Assessment Guidelines and Instructions	All merchants and service providers
PCI Data Security Standard: Self-Assessment Questionnaire A and Attestation	Eligible merchants <sup>1</sup>
PCI Data Security Standard: Self-Assessment Questionnaire B and Attestation	Eligible merchants <sup>1</sup>
PCI Data Security Standard: Self-Assessment Questionnaire C-VT and Attestation	Eligible merchants <sup>1</sup>
PCI Data Security Standard: Self-Assessment Questionnaire C and Attestation	Eligible merchants <sup>1</sup>
PCI Data Security Standard: Self-Assessment Questionnaire D and Attestation	Eligible merchants and service providers <sup>1</sup>
PCI Data Security Standard and Payment Application Data Security Standard: Glossary of Terms, Abbreviations, and Acronyms	All merchants and service providers

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To determine the appropriate Self-Assessment Questionnaire, see *PCI Data Security Standard: Self-Assessment Guidelines and Instructions*, "Selecting the SAQ and Attestation That Best Apply to Your Organization."



#### **Before You Begin**

#### **Completing the Self-Assessment Questionnaire**

SAQ D has been developed for all SAQ-eligible service providers and for all merchants not meeting the descriptions of SAQ types A through C as described briefly in the table below and fully in *PCI DSS Self-Assessment Questionnaire Instructions and Guidelines*.

SAQ	Description
Α	Card-not-present (e-commerce or mail/telephone-order) merchants, all cardholder data functions outsourced. <i>This would never apply to face-to-face merchants.</i>
В	Imprint-only merchants with no electronic cardholder data storage, or standalone, dial-out terminal merchants with no electronic cardholder data storage
C-VT	Merchants using only web-based virtual terminals, no electronic cardholder data storage
С	Merchants with payment application systems connected to the Internet, no electronic cardholder data storage
D	All other merchants (not included in descriptions for SAQs A through C above) and all service providers defined by a payment brand as eligible to complete an SAQ.

SAQ D applies to SAQ-eligible merchants not meeting the criteria for SAQ types A through C, above and all service providers defined by a payment brand as being SAQ-eligible. SAQ D service providers and merchants validate compliance by completing SAQ D and the associated Attestation of Compliance. While many of the organizations completing SAQ D will need to validate compliance with every PCI DSS requirement, some organizations with very specific business models may find that some requirements do not apply. For example, a company that does not use wireless technology in any capacity would not be expected to validate compliance with the sections of the PCI DSS that are specific to managing wireless technology. See the guidance below for information about the exclusion of wireless technology and certain other, specific requirements.

Each section of this questionnaire focuses on a specific area of security, based on the requirements in the PCI DSS.

#### **PCI DSS Compliance – Completion Steps**

- 1. Assess your environment for compliance with the PCI DSS.
- 2. Complete the Self-Assessment Questionnaire (SAQ D) according to the instructions in the Self-Assessment Questionnaire Instructions and Guidelines.
- 3. Complete a passing vulnerability scan with a PCI SSC Approved Scanning Vendor (ASV), and obtain evidence of a passing scan from the ASV.
- 4. Complete the Attestation of Compliance in its entirety.
- 5. Submit the SAQ, evidence of a passing scan, and the Attestation of Compliance, along with any other requested documentation, to your acquirer (for merchants) or to the payment brand or other requester (for service providers).



#### Guidance for Non-Applicability of Certain, Specific Requirements

**Exclusion:** If you are required to answer SAQ D to validate your PCI DSS compliance, the following exceptions may be considered. See "Non-Applicability" below for the appropriate SAQ response.

- The questions specific to wireless only need to be answered if wireless is present anywhere in your network (for example, Requirements 1.2.3, 2.1.1, and 4.1.1). Note that Requirement 11.1 (use of process to identify unauthorized wireless access points) must still be answered even if wireless is not in your network, since the process detects any rogue or unauthorized devices that may have been added without your knowledge.
- The questions specific to custom applications and code (Requirements 6.3 and 6.5) only need to be answered if your organization develops its own custom applications.
- The questions for Requirements 9.1 through 9.4 only need to be answered for facilities with "sensitive areas" as defined here. "Sensitive areas" refers to any data center, server room or any area that houses systems that store, process, or transmit cardholder data. This excludes the areas where only point-of-sale terminals are present, such as the cashier areas in a retail store, but does include retail store back-office server rooms that store cardholder data, and storage areas for large quantities of cardholder data.

**Non-Applicability:** These and any other requirements deemed not applicable to your environment must be indicated with "N/A" in the "Special" column of the SAQ. Accordingly, complete the "Explanation of Non-Applicability" worksheet in Appendix D for each "N/A" entry.



#### Attestation of Compliance, SAQ D-Merchant Version

#### **Instructions for Submission**

The merchant must complete this Attestation of Compliance as a declaration of the merchant's compliance status with the *Payment Card Industry Data Security Standard (PCI DSS) Requirements and Security Assessment Procedures.* Complete all applicable sections and refer to the submission instructions at PCI DSS Compliance – Completion Steps in this document.

Part 1. Merchant and Qualified Security Assessor Information								
Part 1a. Merchant Organization Information								
Company Name:					DBA(s):			
Contact Name:					Title:			
Telephone:					E-mail:			
Business Address:					City:			
State/Province:			Country	:			Zip:	
URL:								
Part 1b. Qualified Security	y Assess	or Compa	any Infor	matio	n (if appli	cable)		
Company Name:								
Lead QSA Contact Name:					Title:			
Telephone:					E-mail:			
Business Address:					City:			
State/Province:			Country	:			Zip:	
URL:								
Part 2 Type of merchant	busines	s (check	all that	apply	<b>/</b> ):			
☐ Retailer ☐	] Telecomi	munication			☐ Grocery	and Superma	rkets	
☐ Petroleum ☐	] E-Comm	erce			☐ Mail/Tel	ephone-Order		
Others (please specify):								
List facilities and locations include	led in PCI	DSS review	<i>I</i> :					
Part 2a. Relationships								
	ationahin	with and a		d 50 m4	u ogosto /f	or overenie		
Does your company have a rel gateways, web-hosting compa							☐ Ye	es 🗌 No
Does your company have a rel	ationship	with more	than one a	acquire	er?		☐ Ye	es 🗌 No
Part 2b. Transaction Proc	essing							
How and in what capacity does	s your bus	iness store	, process	and/o	r transmit o	ardholder data	a?	
Please provide the following in	formation	regarding	the Payme	ent Ap	plications y	our organizati	on uses	:
Payment Application in Use		Version	•			according to		



Par	t 3. PCI DSS Validation					
	d on the results noted in the SAQ D dated (completion date), (Meliance status (check one):	erchant Company Name) asserts the following				
	<b>Compliant:</b> All sections of the PCI SAQ are complete, all quest overall <b>COMPLIANT</b> rating; <b>and</b> a passing scan has been complete (ASV), thereby (Merchant Company Name) has demon	oleted by a PCI SSC Approved Scanning				
	Non-Compliant: Not all sections of the PCI DSS SAQ are complete, or not all questions are answered "yes," resulting in an overall NON-COMPLIANT rating, or a passing scan has not been completed by a PCI SSC Approved Scanning Vendor (ASV), thereby (Merchant Company Name) has not demonstrated full compliance with the PCI DSS.					
	Target Date for Compliance:					
	An entity submitting this form with a status of Non-Compliant may be required to complete the Action Plan in Part 4 of this document. Check with your acquirer or the payment brand(s) before completing Part 4, since not all payment brands require this section.					
Pa	art 3a. Confirmation of Compliant Status					
Mer	chant confirms:					
	PCI DSS Self-Assessment Questionnaire D, Version (version instructions therein.	of SAQ), was completed according to the				
	All information within the above-referenced SAQ and in this at assessment in all material respects.	testation fairly represents the results of my				
	I have confirmed with my payment application vendor that my authentication data after authorization.	payment system does not store sensitive				
	I have read the PCI DSS and I recognize that I must maintain	full PCI DSS compliance at all times.				
	No evidence of magnetic stripe (i.e., track) data <sup>2</sup> , CAV2, CVC after transaction authorization was found on ANY systems rev					
_	(A) M. J. (A) J.					
Pa	art 3b. Merchant Acknowledgement					
Sig	nature of Merchant Executive Officer ↑	Date ↑				
Me	rchant Executive Officer Name 个	Title ↑				
Me	Merchant Company Represented ↑					

<sup>&</sup>lt;sup>2</sup> Data encoded in the magnetic stripe or equivalent data on a chip used for authorization during a card-present transaction. Entities may not retain full magnetic-stripe data after transaction authorization. The only elements of track data that may be retained are account number, expiration date, and name.

The three- or four-digit value printed on or to the right of the signature panel or on the face of a payment card used to verify card-not-present transactions.

<sup>&</sup>lt;sup>4</sup> Personal Identification Number entered by cardholder during a card-present transaction, and/or encrypted PIN block present within the transaction message.



#### Part 4. Action Plan for Non-Compliant Status

Please select the appropriate "Compliance Status" for each requirement. If you answer "NO" to any of the requirements, you are required to provide the date Company will be compliant with the requirement and a brief description of the actions being taken to meet the requirement. Check with your acquirer or the payment brand(s) before completing Part 4, since not all payment brands require this section.

DOLDOO		Compliance Status (Select One)		Remediation Date and Actions
PCI DSS Requirement	Description of Requirement	YES	NO	(if Compliance Status is "NO")
1	Install and maintain a firewall configuration to protect cardholder data			
2	Do not use vendor-supplied defaults for system passwords and other security parameters			
3	Protect stored cardholder data			
4	Encrypt transmission of cardholder data across open, public networks			
5	Use and regularly update anti-virus software or programs			
6	Develop and maintain secure systems and applications			
7	Restrict access to cardholder data by business need to know			
8	Assign a unique ID to each person with computer access			
9	Restrict physical access to cardholder data			
10	Track and monitor all access to network resources and cardholder data			
11	Regularly test security systems and processes			
12	Maintain a policy that addresses information security for all personnel			



#### Attestation of Compliance, SAQ D—Service Provider Version

#### Instructions for Submission

The service provider must complete this Attestation of Compliance as a declaration of the service provider's compliance status with the *Payment Card Industry Data Security Standard (PCI DSS) Requirements and Security Assessment Procedures*. Complete all applicable sections and refer to the submission instructions at "PCI DSS Compliance – Completion Steps" in this document.

Part 1. Service Provider and	Qualified Se	curity Ass	ses	sor Inf	ormation		
Part 1a. Service Provider Orga	nization Infor	mation					
Company Name:				DBA(s	):		
Contact Name:				Title:			
Telephone:				E-mail	:		
Business Address:				City:			
State/Province:		Country:				Zip:	
URL:							
Part 1b. Qualified Security Ass	sessor Compa	any Informa	atio	n (if apı	olicable)		
Company Name:							
Lead QSA Contact Name:				Title:			
Telephone:				E-mai	:		
Business Address:				City:			
State/Province:		Country:				Zip:	
URL:							
Part 2. PCI DSS Assessment	Information	ı					
Part 2a. Services Provided tha (check all that apply)	t WERE INCL	UDED in th	e S	cope of	the PCI D	SS Ass	essment
☐ 3-D Secure Hosting Provider	☐ Hosting F	Provider – Ha	rdwa	are	☐ Paymen	t Process	sing – ATM
☐ Account Management	☐ Hosting F	Provider – We	eb		☐ Paymen	t Process	sing – MOTO
☐ Authorization	☐ Issuer Pr	ocessing			☐ Paymen	t Process	sing – Internet
☐ Back Office Services	☐ Loyalty P	rograms			☐ Payment Processing – POS		
☐ Billing Management	☐ Managed	l Services			☐ Prepaid Services		
☐ Clearing and Settlement	☐ Merchant	Services			☐ Records Management		
☐ Data Preparation	☐ Network Provider/Transmitte			itter	tter		
☐ Fraud and Chargeback Services	☐ Payment	Gateway/Sw	itch				
Others (please specify):							
List facilities and locations included in	PCI DSS review	v:					



Part 2b. If any services listed are Scope of the PCI DSS Assessment,	provided by the service provider please check them below:	out WERE NOT INCLUDED in the							
☐ 3-D Secure Hosting Provider	☐ Hosting Provider – Hardware	☐ Payment Processing – ATM							
☐ Account Management	☐ Hosting Provider – Web	☐ Payment Processing – MOTO							
☐ Authorization	☐ Issuer Processing	☐ Payment Processing – Internet							
☐ Back Office Services	☐ Loyalty Programs	☐ Payment Processing – POS							
☐ Billing Management	☐ Managed Services	☐ Prepaid Services							
☐ Clearing and Settlement	☐ Merchant Services	☐ Records Management							
☐ Data Preparation	☐ Network Provider/Transmitter	☐ Tax/Government Payments							
☐ Fraud and Chargeback Services	☐ Payment Gateway/Switch								
Others (please specify):									
Part 2c. Relationships									
Does your company have a relationsh example, gateways, web-hosting competc.)?									
Part 2d. Transaction Processing									
How and in what capacity does your bus	·								
Payment Application in Use	Version Number Last Valida	ted according to PABP/PA-DSS							
Places provide the following information									
Flease provide the following information		our organization upon:							
	regarding the Payment Applications y	our organization uses:							
Part 3. PCI DSS Validation	regarding the Payment Applications y	our organization uses:							
Part 3. PCI DSS Validation  Based on the results noted in the SAQ D the following compliance status (check or	dated (completion date of SAQ), (Serv	·							
Based on the results noted in the SAQ D the following compliance status (check or Compliant: All sections of the PCI SCOMPLIANT rating; and a passing	dated (completion date of SAQ), (Serv	ice Provider Company Name) asserts asserted "yes", resulting in an overall C Approved Scanning Vendor (ASV),							
Based on the results noted in the SAQ D the following compliance status (check or Compliant: All sections of the PCI S COMPLIANT rating; and a passing thereby (Service Provider Company  Non-Compliant: Not all sections of in an overall NON-COMPLIANT rati	dated (completion date of SAQ), (Service):  6AQ are complete, and all questions are scan has been completed by a PCI SS	ice Provider Company Name) asserts asswered "yes", resulting in an overall C Approved Scanning Vendor (ASV), ace with the PCI DSS.  uestions are answered "no", resulting mpleted by a PCI SSC Approved							
Based on the results noted in the SAQ D the following compliance status (check or Compliant: All sections of the PCI S COMPLIANT rating; and a passing thereby (Service Provider Company  Non-Compliant: Not all sections of in an overall NON-COMPLIANT rating Scanning Vendor (ASV), thereby (S	dated (completion date of SAQ), (Service):  SAQ are complete, and all questions are scan has been completed by a PCI SS Name) has demonstrated full compliant the PCI SAQ are complete, or some ong, or a passing scan has not been co	ice Provider Company Name) asserts asswered "yes", resulting in an overall C Approved Scanning Vendor (ASV), ace with the PCI DSS.  uestions are answered "no", resulting mpleted by a PCI SSC Approved							
Based on the results noted in the SAQ D the following compliance status (check or Compliant: All sections of the PCI S COMPLIANT rating; and a passing thereby (Service Provider Company)  Non-Compliant: Not all sections of in an overall NON-COMPLIANT rati Scanning Vendor (ASV), thereby (Sthe PCI DSS.  Target Date for Compliance: An entity submitting this form with a	dated (completion date of SAQ), (Service):  SAQ are complete, and all questions are scan has been completed by a PCI SS Name) has demonstrated full compliant the PCI SAQ are complete, or some one, or a passing scan has not been concervice Provider Company Name) has restatus of Non-Compliant may be required your acquirer or the payment brand(s)	ice Provider Company Name) asserts asswered "yes", resulting in an overall C Approved Scanning Vendor (ASV), and with the PCI DSS.  uestions are answered "no", resulting mpleted by a PCI SSC Approved of demonstrated full compliance with							



Serv	rice Provider confirms:					
	Self-Assessment Questionnaire D, Version (insert version number), was completed according to the instructions therein.					
	All information within the above-referenced SAQ and in this attestation fairly represents the results of my assessment.					
	I have read the PCI DSS and I recognize that I must maintain full PCI DSS compliance at all times.					
	No evidence of magnetic stripe (i.e., track) data <sup>5</sup> , CAV2, CVC2, CID, or CVV2 data <sup>6</sup> , or PIN data <sup>7</sup> storage after transaction authorization was found on ANY systems reviewed during this assessment.					
Pa	rt 3b. Service Provider Acknowledgement					
Pa	rt 3b. Service Provider Acknowledgement					
	gnature of Service Provider Executive Officer ↑	Date ↑				
Sig	-	Date ↑  Title ↑				

Please select the appropriate "Compliance Status" for each requirement. If you answer "NO" to any of the requirements, you are required to provide the date Company will be compliant with the requirement and a brief description of the actions being taken to meet the requirement. Check with your acquirer or the payment brand(s) before completing Part 4, since not all payment brands require this section.

Data encoded in the magnetic stripe or equivalent data on a chip used for authorization during a card-present transaction. Entities may not retain full magnetic-stripe data after transaction authorization. The only elements of track data that may be retained are account number, expiration date, and name.

The three- or four-digit value printed on or to the right of the signature panel or on the face of a payment card used to verify cardnot-present transactions.

Personal Identification Number entered by cardholder during a card-present transaction, and/or encrypted PIN block present within the transaction message.



201200			ce Status et One)	Remediation Date and Actions			
Requirement	PCI DSS equirement Description of Requirement		NO	(if Compliance Status is "NO")			
1	Install and maintain a firewall configuration to protect cardholder data						
2	Do not use vendor-supplied defaults for system passwords and other security parameters						
3	Protect stored cardholder data						
4	Encrypt transmission of cardholder data across open, public networks						
5	Use and regularly update anti-virus software or programs						
6	Develop and maintain secure systems and applications						
7	Restrict access to cardholder data by business need to know						
8	Assign a unique ID to each person with computer access						
9	Restrict physical access to cardholder data						
10	Track and monitor all access to network resources and cardholder data						
11	Regularly test security systems and processes						
12	Maintain a policy that addresses information security for all personnel						



#### **Self-Assessment Questionnaire D**

**Note:** The following questions are numbered according to PCI DSS requirements and testing procedures, as defined in the PCI DSS Requirements and Security Assessment Procedures document.

Date of Completion:

#### **Build and Maintain a Secure Network**

Requirement 1: Install and maintain a firewall configuration to protect data

	PCI DSS Question Response:				<u>No</u>	<u>Special</u> *
1.1		irewall and router configuration standards established to ollowing:	include			
	1.1.1	Is there a formal process for approving and testing all enetwork connections and changes to the firewall and reconfigurations?				
	1.1.2	(a) Is there a current network diagram (for example, or shows cardholder data flows over the network) tha documents all connections to cardholder data, inclu- any wireless networks?	t			
		(b) Is the diagram kept current?				
	1.1.3	<ul> <li>(a) Do configuration standards include requirements for firewall at each Internet connection and between a demilitarized zone (DMZ) and the internal network</li> </ul>	ny			
		(b) Is the current network diagram consistent with the configuration standards?	firewall			
	1.1.4	Do firewall and router configuration standards include a description of groups, roles, and responsibilities for log management of network components?				
	1.1.5	(a) Do firewall and router configuration standards includocumented list of services, protocols and ports new for business (for example, hypertext transfer protoc (HTTP), Secure Sockets Layer (SSL), Secure She and Virtual Private Network (VPN) protocols).	ecessary col			
		(b) Are all allowed insecure services, protocols, and p necessary, and are security features documented implemented for each?				
		Note: Examples of insecure services, protocols, or po include but are not limited to FTP, Telnet, POP3, IMAR SNMP.				

<sup>&</sup>quot;Not Applicable" (N/A) or "Compensating Control Used." Organizations using this section must complete the Compensating Control Worksheet or Explanation of Non-Applicability Worksheet, as appropriate, in the Appendix.



	PCI DS	S Question Respor	ise:	<u>Yes</u>	<u>No</u>	Special*
	1.1.6	(a) Do firewall and router configuration standards requireview of firewall and router rule sets at least every months?				
		(b) Are firewall and router rule sets reviewed at least even months?	very six			
1.2	untru	irewall and router configurations restrict connections betw usted networks and any system in the cardholder data ronment as follows:	een			
	netw	e: An "untrusted network" is any network that is external to works belonging to the entity under review, and/or which is entity's ability to control or manage.				
	1.2.1	(a) Is inbound and outbound traffic restricted to that wh necessary for the cardholder data environment, and the restrictions documented?				
		(b) Is all other inbound and outbound traffic specifically (for example by using an explicit "deny all" or an im- deny after allow statement)?				
	1.2.2	Are router configuration files secure and synchronized?				
	1.2.3	Are perimeter firewalls installed between any wireless networks and the cardholder data environment, and are firewalls configured to deny or control (if such traffic is necessary for business purposes) any traffic from the wenvironment into the cardholder data environment?				
1.3	the I	s the firewall configuration prohibit direct public access be nternet and any system component in the cardholder data ronment, as follows:				
	1.3.1	Is a DMZ implemented to limit inbound traffic to only s components that provide authorized publicly accessib services, protocols, and ports?				
	1.3.2	Is inbound Internet traffic limited to IP addresses with DMZ?	in the			
	1.3.3	Are direct connections prohibited for inbound or outbotraffic between the Internet and the cardholder data environment?	ound			
	1.3.4	Are internal addresses prohibited from passing from t Internet into the DMZ?	he			
	1.3.5	Is outbound traffic from the cardholder data environm the Internet explicitly authorized?	ent to			
	1.3.6	Is stateful inspection, also known as dynamic packet filtering, implemented (that is, only established conne are allowed into the network)?	ctions			
	1.3.7	Are system components that store cardholder data (s a database) placed in an internal network zone, segre from the DMZ and other untrusted networks?				



	PCI DSS	Question	Response:	Yes	<u>No</u>	Special*
	1.3.8	(a) Are methods in place to prevent the di IP addresses and routing information t				
		<b>Note</b> : Methods to obscure IP addressing r are not limited to:	may include, but			
		<ul> <li>Network Address Translation (NAT)</li> </ul>	)			
		<ul> <li>Placing servers containing cardholo proxy servers/firewalls or content</li> </ul>				
		<ul> <li>Removal or filtering of route adverting private networks that employ regis</li> </ul>				
		<ul> <li>Internal use of RFC1918 address s registered addresses.</li> </ul>	pace instead of			
		(b) Is any disclosure of private IP address information to external entities authorized				
1.4	`´an Int	personal firewall software installed and actived/or employee-owned computers with direct ternet (for example, laptops used by employed to access the organization's network?	connectivity to the			
	`´ an	the personal firewall software configured to s d not alterable by mobile and/or employee-o ers?				



### Requirement 2: Do not use vendor-supplied defaults for system passwords and other security parameters

	PCI D	SS Question Response:	Yes	<u>No</u>	<u>Special</u> *
2.1	syste Vene simp	vendor-supplied defaults always changed before installing a em on the network? dor-supplied defaults Include but are not limited to passwords, ble network management protocol (SNMP) community strings, and ination of unnecessary accounts.			
	2.1.1	For wireless environments connected to the cardholder data environment or transmitting cardholder data, are defaults changed as follows:			
		(a) Are encryption keys changed from default at installation, and changed anytime anyone with knowledge of the keys leaves the company or changes positions?			
		(b) Are default SNMP community strings on wireless devices changed?			
		(c) Are default passwords/passphrases on access points changed?			
		(d) Is firmware on wireless devices updated to support strong encryption for authentication and transmission over wireless networks?			
		(e) Are other security-related wireless vendor defaults changed, if applicable?			
2.2	; ; ; ;	Are configuration standards developed for all system components and are they consistent with industry-accepted system hardening standards?  Sources of industry-accepted system hardening standards may include, but are not limited to, SysAdmin Audit Network Security (SANS) Institute, National Institute of Standards Technology (NIST), International Organization for Standardization (ISO), and Center for Internet Security (CIS).			
		Are system configuration standards updated as new vulnerability ssues are identified, as defined in requirement 6.2?			
		Are system configuration standards applied when new systems are configured?			
	(d) I	Do system configuration standards include the following:			
	2.2.1	<ul> <li>(a) Is only one primary function implemented per server, to prevent functions that require different security levels from co-existing on the same server?</li> <li>(For example, web servers, database servers, and DNS)</li> </ul>			
		should be implemented on separate servers.)			

<sup>\* &</sup>quot;Not Applicable" (N/A) or "Compensating Control Used." Organizations using this section must complete the Compensating Control Worksheet or Explanation of Non-Applicability Worksheet, as appropriate, in the Appendix.



	PCI DSS	Question	Response:	<u>Yes</u>	<u>No</u>	<u>Special</u> *
		(b) If virtualization technologies are used, is of function implemented per virtual system of device?				
	2.2.2	(a) Are only necessary services, protocols, defined as required for the function of the (services and protocols not directly needed the device's specified function are disabled.	e system ed to perform			
		(b) Are all enabled insecure services, daemo justified, and are security features docume implemented?				
		(For example, secured technologies such as SSL, or IPSec VPN are used to protect insect such as NetBIOS, file-sharing, Telnet, FTP, e	ure services			
	2.2.3	(a) Are system administrators and/or personr configure system components knowledge common security parameter settings for the components?	able about			
		(b) Are common system security parameters included in the system configuration stand				
		(c) Are security parameter settings set approsystem components?	priately on			
	2.2.4	(a) Has all unnecessary functionality—such drivers, features, subsystems, file system unnecessary web servers—been removed	s, and			
		(b) Are enabled functions documented and desecure configuration?	o they support			
		(c) Is only documented functionality present of components?	on system			
2.3	Use tec	console administrative access encrypted as following the source of the console such as SSH, VPN, or SSL/TLS for we coment and other non-console administrative acceptable.	veb-based			
	cryp	Il non-console administrative access encrypted tography, and is a strong encryption method in administrator's password is requested?				
		system services and parameter files configured of Telnet and other insecure remote login com				
		dministrator access to web-based managemen rypted with strong cryptography?	t interfaces			
2.4	protect	re a shared hosting provider, are your systems each entity's hosted environment and cardhold	er data?			
		pendix A: Additional PCI DSS Requirements for Providers for specific requirements that must be providers for specific requirements that must be provided as a specific requirement of the provided				



#### **Protect Cardholder Data**

#### Requirement 3: Protect stored cardholder data

	PCI DSS	Question Respons	se:	Yes	<u>No</u>	<u>Special</u> *
3.1		e data retention and disposal policies and procedures plemented as follows:				
	3.1.1	(a) Are data retention and disposal policies and procedur implemented and do they include specific requirement for retention of cardholder data as required for busine legal, and/or regulatory purposes? For example, cardholder data needs to be held for X perifor Y business reasons.	nts ess,			
		(b) Do policies and procedures include provisions for the secure disposal of data when no longer needed for le regulatory, or business reasons, including disposal o cardholder data?	egal,			
		(c) Do policies and procedures include coverage for all storage of cardholder data?				
		(d) Do processes and procedures include at least one of following?	the			
		<ul> <li>A programmatic process (automatic or manual) to remove, at least quarterly, stored cardholder data t exceeds requirements defined in the data retention policy</li> </ul>	that			
		<ul> <li>Requirements for a review, conducted at least quarterly, to verify that stored cardholder data does exceed requirements defined in the data retention policy.</li> </ul>	s not			
		(e) Does all stored cardholder data meet the requirement defined in the data retention policy?	nts			
3.2	(a)	For issuers and/or companies that support issuing services store sensitive authentication data, is there is a business justification for the storage of sensitive authentication data, is that the data is secured?				
	(b)	For all other entities, if sensitive authentication data is recei and deleted, are processes in place to securely delete the of to verify that the data is unrecoverable?				
	(c)	Do all systems adhere to the following requirements regarding non-storage of sensitive authentication data after authorizate (even if encrypted):				

<sup>\* &</sup>quot;Not Applicable" (N/A) or "Compensating Control Used." Organizations using this section must complete the Compensating Control Worksheet or Explanation of Non-Applicability Worksheet, as appropriate, in the Appendix.



Р	PCI DS	S Question Response	e:	<u>Yes</u>	<u>No</u>	<u>Special</u> *
3	3.2.1	The full contents of any track from the magnetic stripe (located on the back of a card, equivalent data contained a chip, or elsewhere) are not stored under any circumstant This data is alternatively called full track, track, track 1, traced, and magnetic-stripe data.  Note: In the normal course of business, the following data elements from the magnetic stripe may need to be retained.  The cardholder's name,  Primary account number (PAN),  Expiration date, and  Service code  To minimize risk, store only these data elements as needefor business.	nce? ack a ed:			
3	3.2.2	The card verification code or value (three-digit or four-diginumber printed on the front or back of a payment card) is stored under any circumstance?				
3	3.2.3	The personal identification number (PIN) or the encrypted PIN block are not stored under any circumstance?	I			
3.3	are	the PAN masked when displayed (the first six and last four dige the maximum number of digits to be displayed)?  otes:  This requirement does not apply to employees and other parties with a specific need to see the full PAN;  This requirement does not supersede stricter requirements place for displays of cardholder data—for example, for poin sale (POS) receipts.	: in			
3.4	replog	PAN rendered unreadable anywhere it is stored (including dat positories, portable digital media, backup media, and in audit gs), by using any of the following approaches?  One-way hashes based on strong cryptography (hash must of the entire PAN)  Truncation (hashing cannot be used to replace the truncated segment of PAN)  Index tokens and pads (pads must be securely stored)  Strong cryptography with associated key management processes and procedures.  Ote: It is a relatively trivial effort for a malicious individual to construct original PAN data if they have access to both the uncated and hashed version of a PAN. Where hashed and uncated versions of the same PAN are present in an entity's prironment, additional controls should be in place to ensure the enashed and truncated versions cannot be correlated to construct the original PAN.	be d			
3	3.4.1	If disk encryption (rather than file- or column-level database encryption) is used, is access managed as follows:	se			



	PCI [	oss	Question Respo	onse:	Yes	<u>No</u>	<u>Special</u> *
			(a) Is logical access to encrypted file systems manage independently of native operating system access of mechanisms (for example, by not using local user account databases)?				
			(b) Are cryptographic keys stored securely (for examp stored on removable media that is adequately pro- with strong access controls)?				
			(c) Is cardholder data on removable media encrypted wherever stored?				
			<b>Note</b> : If disk encryption is not used to encrypt removal media, the data stored on this media will need to be reunreadable through some other method.				
3.5			any keys used to secure cardholder data protected agai closure and misuse as follows:	nst			
		pro	te: This requirement also applies to key-encrypting keys u tect data-encrypting keys. Such key-encrypting keys mus st as strong as the data-encrypting key.				
	3.5.1		Is access to cryptographic keys restricted to the fewes number of custodians necessary?	t			
	3.5.2		(a) Are keys stored in encrypted format and are key- encrypting keys stored separately from data-encry keys?	pting			
			(b) Are cryptographic keys stored in the fewest possible locations and forms?	ole			
3.6		(a)	Are all key-management processes and procedures fully documented and implemented for cryptographic keys use encryption of cardholder data?				
	-	(b)	For service providers only: If keys are shared with custor transmission or storage of cardholder data, is documental provided to customers that includes guidance on how to securely transmit, store and update customer's keys, in accordance with requirements 3.6.1 through 3.6.8 below	ation			
	_	(c)	Are key-management processes and procedures implem to require the following:	ented			
	3.6.	1	Do cryptographic key procedures include the generation strong cryptographic keys?	on of			
	3.6.2	2	Do cryptographic key procedures include secure cryptographic key distribution?				
	3.6.3	3	Do cryptographic key procedures include secure cryptographic key storage?				



PCI DSS	Question Respon	se: <u>\</u>	<u>′es</u>	<u>No</u>	<u>Special</u> *
3.6.4	Do cryptographic key procedures include cryptographic key changes for keys that have reached the end of their defir cryptoperiod (for example, after a defined period of time passed and/or after a certain amount of cipher-text has be produced by a given key), as defined by the associated application vendor or key owner, and based on industry by practices and guidelines (for example, NIST Special Publication 800-57)?	ned has been			
3.6.5	(a) Do cryptographic key procedures include retirement replacement (for example, archiving, destruction, and revocation) of cryptographic keys when the integrity the key has been weakened (for example, departure an employee with knowledge of a clear-text key)?	d/or of			
	(b) Do cryptographic key procedures include replaceme known or suspected compromised keys?	nt of			
	(c) If retired or replaced cryptographic keys are retained these keys only used for decryption/verification purpo (not used for encryption operations)?				
3.6.6	Do cryptographic key procedures include split knowledge dual control of cryptographic keys (for example, requiring or three people, each knowing only their own key compoto reconstruct the whole key), for manual clear-text keymanagement operations?  Note: Examples of manual key management operations include, but are not limited to: key generation, transmissing	g two nent,			
	loading, storage and destruction.	iori,			
3.6.7	Do cryptographic key procedures include the prevention unauthorized substitution of cryptographic keys?	of			
3.6.8	Are cryptographic key custodians required to formally acknowledge (in writing or electronically) that they understand and accept their key-custodian responsibilities	es?			



#### Requirement 4: Encrypt transmission of cardholder data across open, public networks

	PCI DSS Question Response:	Yes	No	Special*
4.1	<ul> <li>(a) Are strong cryptography and security protocols, such as SSL/TLS, SSH or IPSEC, used to safeguard sensitive cardholder data during transmission over open, public networks?</li> <li>Examples of open, public networks that are in scope of the PCI DSS include but are not limited to the Internet, wireless technologies, Global System for Mobile communications (GSM), and General Packet Radio Service (GPRS).</li> </ul>			
	(b) Are only trusted keys and/or certificates accepted?			
	(c) Are security protocols implemented to use only secure configurations, and not support insecure versions or configurations?			
	(d) Is the proper encryption strength implemented for the encryption methodology in use (check vendor recommendations/best practices)?			
	(e) For SSL/TLS implementations:			
	<ul> <li>Does HTTPS appear as part of the browser Universal Record Locator (URL)?</li> <li>Is cardholder data required only when HTTPS appears in the URL?</li> </ul>			
	4.1.1 Are industry best practices (for example, IEEE 802.11i) used to implement strong encryption for authentication and transmission for wireless networks transmitting cardholder data or connected to the cardholder data environment?  Note: The use of WEP as a security control was prohibited			
	as of 30 June, 2010.			
4.2	(a) Are PANs rendered unreadable or secured with strong cryptography whenever they are sent via end-user messaging technologies (for example, e-mail, instant messaging, or chat)?			
	(b) Are policies in place that state that unprotected PANs are not to be sent via end-user messaging technologies?			

<sup>\* &</sup>quot;Not Applicable" (N/A) or "Compensating Control Used." Organizations using this section must complete the Compensating Control Worksheet or Explanation of Non-Applicability Worksheet, as appropriate, in the Appendix.



#### **Maintain a Vulnerability Management Program**

#### Requirement 5: Use and regularly update anti-virus software or programs

	PCI DS	S Question Response:	<u>Yes</u>	<u>No</u>	Special*
5.1		anti-virus software deployed on all systems commonly affected malicious software?			
	5.1.1	Are all anti-virus programs capable of detecting, removing, and protecting against all known types of malicious software (for example, viruses, Trojans, worms, spyware, adware, and rootkits)?	d t		
5.2		anti-virus software current, actively running, and generating audi as follows:	t		
	(a)	Does the anti-virus policy require updating of anti-virus softward and definitions?	e 🗌		
	(b)	Is the master installation of the software enabled for automatic updates and scans?			
	(c)	Are automatic updates and periodic scans enabled?			
	(d)	Are all anti-virus mechanisms generating audit logs, and are logs retained in accordance with PCI DSS Requirement 10.7?			

#### Requirement 6: Develop and maintain secure systems and applications

	PCI DSS Question Res	ponse:	Yes	No	<u>Special</u> *
6.1	(a) Are all system components and software protected fror vulnerabilities by having the latest vendor-supplied sec patches installed?				
	(b) Are critical security patches installed within one month release?	of			
	<b>Note</b> : An organization may consider applying a risk-based to prioritize their patch installations. For example, by prioritic critical infrastructure (for example, public-facing devices an systems, databases) higher than less-critical internal device ensure high-priority systems and devices are addressed with month, and addressing less critical devices and systems withree months.	izing Id es, to ithin one			

<sup>\* &</sup>quot;Not Applicable" (N/A) or "Compensating Control Used." Organizations using this section must complete the Compensating Control Worksheet or Explanation of Non-Applicability Worksheet, as appropriate, in the Appendix.

<sup>\* &</sup>quot;Not Applicable" (N/A) or "Compensating Control Used." Organizations using this section must complete the Compensating Control Worksheet or Explanation of Non-Applicability Worksheet, as appropriate, in the Appendix.



	PCI DSS Question Response:	<u>Yes</u>	<u>No</u>	<u>Special</u> *
6.2	<ul> <li>(a) Is there a process to identify newly discovered security vulnerabilities, including a risk ranking that is assigned to such vulnerabilities? (At minimum, the most critical, highest risk vulnerabilities should be ranked as "High".)</li> <li>Note: Risk rankings should be based on industry best practices. For example, criteria for ranking 'High' risk vulnerabilities may include a CVSS base score of 4.0 or above, and/or a vendor-supplied patch classified by the vendor as "critical", and/or a vulnerability affecting a critical system component.</li> <li>The ranking of vulnerabilities is considered a best practice until June 30, 2012, after which it becomes a requirement.</li> </ul>			
	(b) Do processes to identify new security vulnerabilities include using outside sources for security vulnerability information?			
6.3	(a) Are software development processes based on industry standards and/or best practices?			
	(b) Is information security included throughout the software development life cycle?			
	(c) Are software applications developed in accordance with PCI DSS (for example, secure authentication and logging)?			
	(d) Do software development processes ensure the following?			
	6.3.1 Are custom application accounts, user IDs, and/or passwords removed before applications become active or are released to customers?			
	<ul> <li>Are all custom application code changes reviewed (either using manual or automated processes) prior to release to production or customers in order to identify any potential coding vulnerability as follows: <ul> <li>Code changes are reviewed by individuals other than the originating code author, and by individuals who are knowledgeable in code review techniques and secure coding practices?</li> <li>Code reviews ensure code is developed according to secure coding guidelines (per PCI DSS Requirement 6.5)?</li> <li>Appropriate corrections are implemented prior to release?</li> <li>Code review results are reviewed and approved by management prior to release?</li> </ul> </li> <li>Note: This requirement for code reviews applies to all custom code (both internal and public-facing), as part of the system development life cycle. Code reviews can be conducted by knowledgeable internal personnel or third parties. Web applications are also subject to additional controls, if they are public-facing, to address ongoing threats and vulnerabilities</li> </ul>			
6.4	after implementation, as defined at PCI DSS Requirement 6.6.  Are change control processes and procedures followed for all changes to system components to include the following:			



	PCI DSS	Question Resp	onse:	<u>Yes</u>	<u>No</u>	<u>Special</u> *
	6.4.1	Are development/test environments separate from the production environment, and is access control in place enforce the separation?				
	6.4.2	Is there separation of duties between personnel assign the development/test environments and those assigne production environment?				
	6.4.3	Are production data (live PANs) <i>not</i> used for testing of development?	r			
	6.4.4	Are test data and accounts removed before production systems become active?	1			
	6.4.5	(a) Are change control procedures for implementing s patches and software modifications documented a require items 6.4.5.1 – 6.4.5.4 below?				
		(b) Is the following performed for all changes:				
	6.4.5.1	Documentation of impact?				
	6.4.5.2	Documented approval by authorized parties?				
	6.4.5.3	(a) Functionality testing to verify that the change doe adversely impact the security of the system?	es not			
		(b) For custom code changes, are updates tested for compliance with PCI DSS Requirement 6.5 befor deployed into production?				
	6.4.5.4	Are back-out procedures prepared for each change?				
6.5	(For	Are applications developed based on secure coding guidexample, the Open Web Application Security Project (Cle, SANS CWE Top 25, CERT Secure Coding, etc.)?				
	(b) <i>i</i>	Are developers knowledgeable in secure coding techniq	ues?			
	` ;	Is prevention of common coding vulnerabilities covered software development processes to ensure that applicat not vulnerable to, at a minimum the following:				
	with publ man	e: The vulnerabilities listed at 6.5.1 through 6.5.9 were c industry best practices when this version of PCI DSS w ished. However, as industry best practices for vulnerabi agement are updated, the current best practices must b hese requirements.	as Ility			
	6.5.1	Injection flaws, particularly SQL injection? (Validate inverify user data cannot modify meaning of commands queries, utilize parameterized queries, etc.)  Also consider OS Command Injection, LDAP and XPa injection flaws as well as other injection flaws.	and			
	6.5.2	Buffer overflow? (Validate buffer boundaries and trunc input strings.)	ate			
	6.5.3	Insecure cryptographic storage? (Prevent cryptograph flaws.)	ic			



	PCI DSS	Question Respons	se: <u>Ye</u>	s <u>No</u>	<u>Special</u> *
	6.5.4	Insecure communications? (Properly encrypt all authentic and sensitive communications.)	ated		
	6.5.5	Improper error handling? (Do not leak information via erro messages.)	or 🗌		
	6.5.6	All "High" vulnerabilities identified in the vulnerability identification process (as defined in PCI DSS Requiremer 6.2)?	nt		
		<b>Note</b> : This requirement is considered a best practice until June 30, 2012, after which it becomes a requirement.	,		
		applications and application interfaces (internal or external), ving additional vulnerabilities also addressed:	are		
	6.5.7	Cross-site scripting (XSS)? (Validate all parameters befor inclusion, utilize context-sensitive escaping, etc.)	е 🗌		
	6.5.8	Improper Access Control such as insecure direct object references, failure to restrict URL access, and directory traversal? (Properly authenticate users and sanitize input. not expose internal object references to users.)	Do		
	6.5.9	Cross-site request forgery (CSRF)? (Do not reply on authorization credentials and tokens automatically submit by browsers.)	ted		
6.6	vuln appl	public-facing web applications, are new threats and erabilities addressed on an ongoing basis, and are these lications protected against known attacks by applying either following methods?	of		
	-	Reviewing public-facing web applications via manual or automated application vulnerability security assessment to or methods, as follows:	ools		
		<ul><li>At least annually</li><li>After any changes</li></ul>			
		<ul> <li>After any changes</li> <li>By an organization that specializes in application security</li> </ul>			
		<ul> <li>That all vulnerabilities are corrected</li> </ul>			
		<ul> <li>That the application is re-evaluated after the correct</li> </ul>	tions		
		Or –			
	•	Installing a web-application layer firewall in front of public- facing web applications to detect and prevent web-based attacks.			
	ca a.	<b>lote</b> : "An organization that specializes in application security an be either a third-party company or an internal organization solves solves the reviewers specialize in application security and an demonstrate independence from the development team.	on,		



#### **Implement Strong Access Control Measures**

Requirement 7: Restrict access to cardholder data by business need to know

	PCI DSS	Question Response:	<u>Yes</u>	<u>No</u>	<u>Special</u> *
7.1		ccess to system components and cardholder data limited to those individuals whose jobs require such access, as follows:			
	7.1.1	Are access rights for privileged user IDs restricted to least privileges necessary to perform job responsibilities?			
	7.1.2	Are privileges assigned to individuals based on job classification and function (also called "role-based access control" or RBAC)?			
	7.1.3	Is documented approval by authorized parties required (in writing or electronically) that specifies required privileges?			
	7.1.4	Are access controls implemented via an automated access control system?			
7.2	to re	n access control system in place for systems with multiple users estrict access based on a user's need to know, and is it set to by all" unless specifically allowed, as follows:	3		
	7.2.1	Are access control systems in place on all system components?			
	7.2.2	Are access control systems configured to enforce privileges assigned to individuals based on job classification and function?			
	7.2.3	Do access control systems have a default "deny-all" setting?			
		<b>Note</b> : Some access control systems are set by default to "allow-all," thereby permitting access unless/until a rule is written to specifically deny it.			

<sup>\* &</sup>quot;Not Applicable" (N/A) or "Compensating Control Used." Organizations using this section must complete the Compensating Control Worksheet or Explanation of Non-Applicability Worksheet, as appropriate, in the Appendix.



#### Requirement 8: Assign a unique ID to each person with computer access

	PCI DSS	Question	Response:	<u>Yes</u>	<u>No</u>	<u>Special</u> *
8.1		all users assigned a unique ID before allowing em components or cardholder data?	g them to access			
8.2		ddition to assigning a unique ID, is one or mo hods employed to authenticate all users?  Something you know, such as a password or Something you have, such as a token device Something you are, such as a biometric	passphrase			
8.3	(net netv (For with (TA) facto <b>Not</b>	vo-factor authentication incorporated for remowork-level access originating from outside the vork by employees, administrators, and third prexample, remote authentication and dial-in so tokens; or terminal access controller access CACS) with tokens; or other technologies that or authentication.)  e: Two-factor authentication requires that two mentication methods (see PCI DSS Requirements)	e network) to the parties? ervice (RADIUS) control system t facilitate two-			
	dese Usir	criptions of authentication methods) be used t ng one factor twice (for example, using two se swords) is not considered two-factor authentic	or authentication. parate			
8.4	, ,	Are all passwords rendered unreadable durinand storage on all system components using cryptography?	_			
		For Service Providers only: Are customer parencrypted?	sswords			
8.5	conf	proper user identification and authentication r trols in place for non-consumer users and adr em components, as follows:				
	8.5.1	Are additions, deletions, and modifications credentials, and other identifier objects consuser IDs are implemented only as authorize specified privileges)?	trolled, such that			
	8.5.2	Is user identity verified before performing particles for user requests made via a non-face-to-facexample, phone, e-mail, or web)?				
	8.5.3	Are first-time and reset passwords set to a each user, and must each user change the immediately after the first use?				
	8.5.4	Is access for any terminated users immedia or removed?	ately deactivated			

<sup>\* &</sup>quot;Not Applicable" (N/A) or "Compensating Control Used." Organizations using this section must complete the Compensating Control Worksheet or Explanation of Non-Applicability Worksheet, as appropriate, in the Appendix.



PCI DSS	Question Res <sub>i</sub>	oonse:	Yes	<u>No</u>	<u>Special</u> *
8.5.5	Are inactive user accounts over 90 days old either re or disabled?	emoved			
8.5.6	(a) Are accounts used by vendors for remote access maintenance or support enabled only during the period needed?				
	(b) Are vendor remote access accounts monitored w use?	vhen in			
8.5.7	Are authentication procedures and policies communall users who have access to cardholder data?	icated to			
8.5.8	Are group, shared, or generic accounts and passworother authentication methods, prohibited as follows:	rds, or			
	<ul> <li>Generic user IDs and accounts are disabled or removed;</li> <li>Shared user IDs for system administration active and other critical functions do not exist; and</li> </ul>				
	<ul> <li>Shared and generic user IDs are not used to administer any system components</li> </ul>				
8.5.9	(a) Are user passwords changed at least every 90 c	lays?			
	(b) For service providers only: Are non-consumer up passwords required to be changed periodically a non-consumer users given guidance as to when under what circumstances, passwords must change.	and are , and			
8.5.10	(a) Is a minimum password length of at least seven characters required?				
	(b) For service providers only: Are non-consumer upasswords required to meet minimum length requirements?	ıser			
8.5.11	(a) Must passwords contain both numeric and alpha characters?	abetic			
	(b) For service providers only: Are non-consumer us passwords required to contain both numeric and alphabetic characters?				
8.5.12	(a) Must an individual submit a new password that is different from any of the last four passwords he has used?				
	(b) For service providers only: Are new, non-consuluser passwords required to be different from any last four passwords used?				
8.5.13	(a) Are repeated access attempts limited by locking user ID after no more than six attempts?	out the			
	(b) For service providers only: Are non-consumer upasswords temporarily locked-out after not more six invalid access attempts?				



PCI DSS	Question Response:	Yes	No	<u>Special</u> *
8.5.14	Once a user account is locked out, is the lockout duration set to a minimum of 30 minutes or until administrator enables the user ID?			
8.5.15	If a session has been idle for more than 15 minutes, are users required to re-authenticate (for example, re-enter the password) to re-activate the terminal or session?			
8.5.16	<ul> <li>(a) Is all access to any database containing cardholder data authenticated? (This includes access by applications, administrators, and all other users.)</li> </ul>			
	(b) Is all user access to, user queries of, and user actions on (for example, move, copy, delete), the database through programmatic methods only (for example, through stored procedures)?			
	(c) Is user direct access or queries to databases restricted to database administrators?			
	(d) Are application IDs with database access only able to be used by the applications (and not by individual users or other processes)?			



#### Requirement 9: Restrict physical access to cardholder data

	PCI DSS	S Question Response	e: <u>Yes</u>	<u>No</u>	<u>Special</u> *
9.1		e appropriate facility entry controls in place to limit and monitor ysical access to systems in the cardholder data environment?			
	9.1.1	<ul> <li>(a) Are video cameras and/or access-control mechanisms in place to monitor individual physical access to sensitive areas?</li> <li>Note: "Sensitive areas" refers to any data center, server room, or any area that houses systems that store cardholded data. This excludes the areas where only point-of-sale terminals are present such as the cashier areas in a retail store.</li> </ul>	□ er		
		(b) Are video cameras and/or access-control mechanisms protected from tampering or disabling?			
		(c) Is data collected from video cameras and/or access control mechanisms reviewed and correlated with other entries, and is data stored for at least three months, unless otherwise restricted by law?	r		
	9.1.2	Is physical access to publicly accessible network jacks restricted (For example, areas accessible to visitors do not have network ports enabled unless network access is explicitly authorized)?  Alternatively, are visitors escorted at all times in areas with active network jacks?			
	9.1.3	Is physical access to wireless access points, gateways, handheld devices, networking/communications hardware, and telecommunication lines restricted?			
9.2	Are procedures developed to easily distinguish between onsite personnel and visitors, as follows:  For the purposes of Requirement 9, "onsite personnel" refers to full-time and part-time employees, temporary employees, contractors and consultants who are physically present on the entity's premises. A "visitor" refers to a vendor, guest of any onsi personnel, service workers, or anyone who needs to enter the facility for a short duration, usually not more than one day.		е		
	(a)	Do processes and procedures for assigning badges to onsite personnel and visitors include the following:  • Granting new badges,  • Changing access requirements, and  • Revoking terminated onsite personnel and expired visitor badges?			
	(b)	Is access to the badge system limited to authorized personnel?			

<sup>\* &</sup>quot;Not Applicable" (N/A) or "Compensating Control Used." Organizations using this section must complete the Compensating Control Worksheet or Explanation of Non-Applicability Worksheet, as appropriate, in the Appendix.



	PCI DSS	Question Respons	se: <u>Yes</u>	<u>No</u>	<u>Special</u> *
		Do badges clearly identify visitors and easily distinguish between onsite personnel and visitors?			
9.3	Are	all visitors handled as follows:			
	9.3.1	Are visitors authorized before entering areas where cardholder data is processed or maintained?			
	9.3.2	(a) Are visitors given a physical token (for example, a badge or access device) that identifies the visitors as not onsite personnel?			
		(b) Do visitor badges expire?			
	9.3.3	Are visitors asked to surrender the physical token before leaving the facility or upon expiration			
9.4	, ,	Is a visitor log in use to record physical access to the facility as well as for computer rooms and data centers where cardholder data is stored or transmitted?			
		Does the visitor log contain the visitor's name, the firm represented, and the onsite personnel authorizing physical access, and is the visitor log retained for at least three months?			
9.5		Are media back-ups stored in a secure location, preferably in an off-site facility, such as an alternate or backup site, or a commercial storage facility?			
	(b) I	s this location's security reviewed at least annually?			
9.6	com repo <i>For</i>	all media physically secured (including but not limited to puters, removable electronic media, paper receipts, paper orts, and faxes)?  purposes of Requirement 9, "media" refers to all paper and extronic media containing cardholder data.			
9.7	` ,	Is strict control maintained over the internal or external distribution of any kind of media?			
	(b)	Do controls include the following:			
	9.7.1	Is media classified so the sensitivity of the data can be determined?			
	9.7.2	Is media sent by secured courier or other delivery method that can be accurately tracked?			
9.8	secu mov	logs maintained to track all media that is moved from a ured area, and is management approval obtained prior to ring the media (especially when media is distributed to riduals)?			
9.9	ls st med	rict control maintained over the storage and accessibility of dia?			
	9.9.1	Are inventory logs of all media properly maintained and ar periodic media inventories conducted at least annually?	е 🗌		



	PCI	DSS Qu	estion	Response:	Yes	<u>No</u>	<u>Special</u> *
9.10		ls all me legal rea	edia destroyed when it is no longer needed for lasons?	ousiness or			
		Is destr	uction performed as follows:				
-	9.10	.1 (a	) Are hardcopy materials cross-cut shredded, or pulped so that cardholder data cannot be reconstructed?	incinerated,			
		(b	Are containers that store information to be d secured to prevent access to the contents? ( example, a "to-be-shredded" container has a preventing access to its contents.)	For			
	9.10	ui w of de	cardholder data on electronic media rendered nrecoverable via a secure wipe program in account industry-accepted standards for secure dele herwise by physically destroying the media (for egaussing), so that cardholder data cannot be constructed?	tion, or			



#### **Regularly Monitor and Test Networks**

Requirement 10: Track and monitor all access to network resources and cardholder data

	PCI DSS	Question	Yes	<u>No</u>	<u>Special</u> *	
10.1	(es	process in place to link all access to system comp pecially access done with administrative privileges each individual user?				
10.2	Are automated audit trails implemented for all system components to reconstruct the following events:					
	10.2.1	All individual user accesses to cardholder data?				
	10.2.2	All actions taken by any individual with root or ac privileges?	dministrative			
	10.2.3	Access to all audit trails?				
	10.2.4	Invalid logical access attempts?				
	10.2 5	Use of identification and authentication mechani	isms?			
	10.2.6	Initialization of the audit logs?				
	10.2.7	Creation and deletion of system-level object?				
10.3	Are the following audit trail entries recorded for all system components for each event:					
	10.3.1	User identification?				
	10.3.2	Type of event?				
	10.3.3	Date and time?				
	10.3.4	Success or failure indication?				
	10.3.5	Origination of event?				
	10.3.6	Identity or name of affected data, system comporesource?	onent, or			
10.4	(a)	Are all critical system clocks and times synchroniz use of time synchronization technology, and is the kept current?				
		te: One example of time synchronization technolog ne Protocol (NTP).	y is Network			
	(b)	Are the following controls implemented for acquirir distributing, and storing time:	ng,			
	10.4.1	(a) Do only designated central time servers recessignals from external sources, and do all crit have the correct and consistent time, based International Atomic Time or UTC?	tical systems			

<sup>\* &</sup>quot;Not Applicable" (N/A) or "Compensating Control Used." Organizations using this section must complete the Compensating Control Worksheet or Explanation of Non-Applicability Worksheet, as appropriate, in the Appendix.



	PCI DSS	Question Response:	Yes	<u>No</u>	<u>Special</u> *
		(b) Do designated central time servers peer with each other to keep accurate time, and do other internal servers only receive time from the central time servers?			
	10.4.2	Is time data is protected as follows:			
		(a) Access to time data is restricted to only personnel with a business need to access time data?			
		(b) Changes to time settings on critical systems are logged, monitored, and reviewed?			
	10.4.3	Are time settings received from specific, industry-accepted time sources?			
		(This is to prevent a malicious individual from changing the clock). Optionally, those updates can be encrypted with a symmetric key, and access control lists can be created that specify the IP addresses of client machines that will be provided with the time updates (to prevent unauthorized use of internal time servers).			
10.5	Are	audit trails secured so they cannot be altered, as follows:			
	10.5.1	Is viewing of audit trails limited to those with a job-related need?			
	10.5.2	Are audit trail files protected from unauthorized modifications via access control mechanisms, physical segregation, and/or network segregation?			
	10.5.3	Are audit trail files promptly backed up to a centralized log server or media that is difficult to alter?			
	10.5.4	Are logs for external-facing technologies (for example, wireless, firewalls, DNS, mail) offloaded or copied onto a secure, centralized log server or media on the internal LAN?			
	10.5.5	Is file-integrity monitoring or change-detection software used on logs to ensure that existing log data cannot be changed without generating alerts (although new data being added should not cause an alert)?			
10.6		logs for all system components reviewed at least daily, and are w-ups to exceptions required?			
	fund auth	reviews must include those servers that perform security ctions like intrusion detection system (IDS) and authentication, norization, and accounting protocol (AAA) servers (for example, DIUS).			
		<b>e:</b> Log harvesting, parsing, and alerting tools may be used to ieve compliance with Requirement 10.6.			
10.7		Are audit log retention policies and procedures in place and do they require that audit trail history is retained for at least one year?			
	. ,	Are audit logs available for at least one year and are processes in place to immediately restore at least the last three months' logs for analysis?			



#### Requirement 11: Regularly test security systems and processes

Р	CI DSS Question	Response:	Yes	<u>No</u>	<u>Special</u> *
11.1	<ul> <li>(a) Is a documented process implemented to determine wireless access points on a quarterly basis?</li> <li>Note: Methods that may be used in the process in not limited to, wireless network scans, physical/log of system components and infrastructure, network (NAC), or wireless IDS/IPS.</li> <li>Whichever methods are used, they must be sufficient identify any unauthorized devices.</li> </ul>	nclude, but are gical inspections k access control			
	<ul> <li>(b) Does the methodology detect and identify any wireless access points, including at least the f</li> <li>WLAN cards inserted into system compore</li> <li>Portable wireless devices connected to sy components (for example, by USB, etc.);</li> <li>Wireless devices attached to a network prodevice?</li> </ul>	following: nents; ystem			
	(c) Is the process to identify unauthorized wireless performed at least quarterly for all system confacilities?				
	(d) If automated monitoring is utilized (for example IDS/IPS, NAC, etc.), is monitoring configured talerts to personnel?				
	(e) Does the Incident Response Plan (Requireme a response in the event unauthorized wireless detected?				
11.2	Are internal and external network vulnerability sca quarterly and after any significant change in the n new system component installations, changes in r topology, firewall rule modifications, product upgra follows?	etwork (such as network			
	<b>Note</b> : It is not required that four passing quarterly completed for initial PCI DSS compliance if 1) the scan result was a passing scan, 2) the entity has policies and procedures requiring quarterly scann vulnerabilities noted in the scan results have been shown in a re-scan. For subsequent years after the review, four passing quarterly scans must have on	most recent documented ing, and 3) n corrected as ne initial PCI DSS			

<sup>\* &</sup>quot;Not Applicable" (N/A) or "Compensating Control Used." Organizations using this section must complete the Compensating Control Worksheet or Explanation of Non-Applicability Worksheet, as appropriate, in the Appendix.



	PCI D	SS Qu	estion R	esponse:	Yes	<u>No</u>	<u>Special</u> *
	11.2.1	(a	) Are quarterly internal vulnerability scans perfo	rmed?			
		(b	) Does the quarterly internal scan process inclu rescans until passing results are obtained, or "High" vulnerabilities as defined in PCI DSS Requirement 6.2 are resolved?				
		(c	Are internal quarterly scans performed by a quinternal resource(s) or qualified external third if applicable, does organizational independent tester exist (not required to be a QSA or ASV)	party, and ce of the			
	11.2.2	(a	) Are quarterly external vulnerability scans perf	ormed?			
		(b	) Do external quarterly scan results satisfy the Program Guide requirements (for example, no vulnerabilities rated higher than a 4.0 by the Cono automatic failures)?	)			
		(c	Are quarterly external vulnerability scans perform an Approved Scanning Vendor (ASV), approve Payment Card Industry Security Standards Construction	ed by the			
	11.2.3	(a	) Are internal and external scans performed after significant change (such as new system comp installations, changes in network topology, fire modifications, product upgrades)?	onent			
			<b>ote</b> : Scans conducted after network changes ma erformed by internal staff.	ay be			
		(b	) Does the scan process include rescans until:				
			<ul> <li>For external scans, no vulnerabilities exis scored greater than a 4.0 by the CVSS,</li> </ul>	t that are			
			<ul> <li>For internal scans, a passing result is obta "High" vulnerabilities as defined in PCI DS Requirement 6.2 are resolved?</li> </ul>				
		(c	Are scans performed by a qualified internal re or qualified external third party, and if applical organizational independence of the tester exis required to be a QSA or ASV)?	ole, does			
11.3	(8	once appl sub-	kternal and internal penetration testing performed a year and after any significant infrastructure of lication changes (such as an operating system unnetwork added to the environment, or a web sele environment)?	or ipgrade, a			
	(k	•	noted exploitable vulnerabilities corrected and to eated?	esting			



	PCI DSS Question Response:	<u>Yes</u>	<u>No</u>	<u>Special</u> *
	(c) Are tests performed by a qualified internal resource or qualified external third party, and if applicable, does organizational independence of the tester exist (not required to be a QSA or ASV).			
	Do these penetration tests include the following:			
	11.3.1 Network-layer penetration tests?  Note: The tests should include components that support network functions as well as operating systems.			
	11.3.2 Application-layer penetration tests?  Note: The tests should include, at a minimum, the vulnerabilities listed in Requirement 6.5.			
11.4	(a) Are intrusion-detection systems and/or intrusion-prevention systems used to monitor all traffic at the perimeter of the cardholder data environment as well as at critical points inside of the cardholder data environment?			
	(b) Are IDS and/or IPS configured to alert personnel of suspected compromises?			
	(c) Are all intrusion-detection and prevention engines, baselines, and signatures kept up-to-date?			
11.5	<ul> <li>(a) Are file-integrity monitoring tools deployed within the cardholder data environment?</li> <li>Examples of files that should be monitored include: <ul> <li>System executables</li> <li>Application executables</li> <li>Configuration and parameter files</li> <li>Centrally stored, historical or archived, log and audit files</li> </ul> </li> </ul>			
	<ul> <li>(b) Are the tools configured to alert personnel to unauthorized modification of critical system files, configuration files or content files, and do the tools perform critical file comparisons at least weekly?</li> <li>Note: For file-integrity monitoring purposes, critical files are usually those that do not regularly change, but the modification of which could indicate a system compromise or risk of compromise. File-integrity monitoring products usually come pre-configured with critical files for the related operating system. Other critical files, such as those for custom applications, must be evaluated and defined by the entity (that is the merchant or service provider).</li> </ul>			



## **Maintain an Information Security Policy**

Requirement 12: Maintain a policy that addresses information security for all personnel

	PCI DSS	Question Response:	<u>Yes</u>	<u>No</u>	<u>Special</u> *
12.1	Is a security policy established, published, maintained, and disseminated to all relevant personnel?				
	For the purposes of Requirement 12, "personnel" refers to full-time part-time employees, temporary employees and personnel, and contractors and consultants who are "resident" on the entity's site or otherwise have access to the company's site cardholder data environment.		)		
	12.1.1	Does the policy address all PCI DSS requirements?			
	12.1.2	(a) Is an annual risk assessment process documented that identifies threats and vulnerabilities, and results in a formal risk assessment?			
		(Examples of risk assessment methodologies include but are not limited to OCTAVE, ISO 27005 and NIST SP 800-30.)	Э		
		(b) Is the risk assessment process performed at least annually?			
	12.1.3	Is the information security policy reviewed at least once a year and updated as needed to reflect changes to business objectives or the risk environment?			
12.2	Are daily operational security procedures developed that a consistent with requirements in this specification (for exam account maintenance procedures, and log review procedudo they include administrative and technical procedures for the requirements?		d		
12.3	acce: medi mail,	usage policies for critical technologies (for example, remotess technologies, wireless technologies, removable electronica, laptops, tablets personal data/digital assistants [PDAs], eand Internet usage) developed to define proper use of these hologies for all personnel, and require the following:			
	12.3.1	Explicit approval by authorized parties to use the technologies?			
	12.3.2	Authentication for use of the technology?			
	12.3.3	A list of all such devices and personnel with access?			
	12.3.4	Labeling of devices to determine owner, contact information and purpose?	, 🗆		
	12.3.5	Acceptable uses of the technologies?			
-	12.3.6	Acceptable network locations for the technologies?			

<sup>\* &</sup>quot;Not Applicable" (N/A) or "Compensating Control Used." Organizations using this section must complete the Compensating Control Worksheet or Explanation of Non-Applicability Worksheet, as appropriate, in the Appendix.



	PCI DS	S Question Response:	<u>Yes</u>	<u>No</u>	<u>Special</u> *
	12.3.7	List of company-approved products?			
	12.3.8	Automatic disconnect of sessions for remote-access technologies after a specific period of inactivity?			
	12.3.9	Activation of remote-access technologies for vendors and business partners only when needed by vendors and business partners, with immediate deactivation after use?			
	12.3.10	(a) For personnel accessing cardholder data via remote- access technologies, does the policy specify the prohibition of copy, move, and storage of cardholder data onto local hard drives and removable electronic media, unless explicitly authorized for a defined business need?			
		(b) For personnel with proper authorization, does the policy require the protection of cardholder data in accordance with PCI DSS Requirements?			
12.4		the security policy and procedures clearly define information curity responsibilities for all personnel?			
12.5	Se	responsibility for information security formally assigned to a Chief curity Officer or other security-knowledgeable member of nagement?			
	Are the following information security management responsibilities formally assigned to an individual or team:				
	12.5.1	Establishing, documenting, and distributing security policies and procedures?			
	12.5.2	Monitoring and analyzing security alerts and information, and distributing to appropriate personnel?			
	12.5.3	Establishing, documenting, and distributing security incident response and escalation procedures to ensure timely and effective handling of all situations?			
	12.5.4	Administering user accounts, including additions, deletions, and modifications?			
	12.5.5	Monitoring and controlling all access to data?			
12.6	(a)	Is a formal security awareness program in place to make all personnel aware of the importance of cardholder data security?			
	(b)	Do security awareness program procedures include the following:			
	12.6.1	<ul> <li>(a) Does the security awareness program provide multiple methods of communicating awareness and educating personnel (for example, posters, letters, memos, web based training, meetings, and promotions)?</li> <li>Note: Methods can vary depending on the role of the</li> </ul>			
		personnel and their level of access to the cardholder data.			
_		(b) Are personnel educated upon hire and at least annually?			



	PCI DSS	Question Respon	ise:	Yes	<u>No</u>	<u>Special</u> *
	12.6.2	Are personnel required to acknowledge at least annuall they have read and understood the security policy and procedures?	y that			
12.7	Requirisk of check histo <b>Note</b> position	cotential personnel (see definition of "personnel" at uirement 12.1, above) screened prior to hire to minimize to fattacks from internal sources? (Examples of backgrour eks include previous employment history, criminal record, by and reference checks.)  E: For those potential personnel to be hired for certain tions, such as store cashiers who only have access to on the ber at a time when facilitating a transaction, this requirem	nd credit e card			
12.8	If car	commendation only.  rdholder data is shared with service providers, are policie edures maintained and implemented to manage service	s and			
		iders, as follows:				
-	12.8.1	Is a list of service providers maintained?				
	12.8.2	Is a written agreement maintained that includes an acknowledgement that the service providers are resport for the security of cardholder data the service providers possess?				
	12.8.3	Is there an established process for engaging service providers, including proper due diligence prior to engagement?				
	12.8.4	Is a program maintained to monitor service providers' PDSS compliance status at least annually?	PCI			
12.9		an incident response plan been implemented in preparat ond immediately to a system breach, as follows:	ion to			
	12.9.1	(a) Has an incident response plan been created to be implemented in the event of system breach?				
		(b) Does the plan address, at a minimum:				
		<ul> <li>Roles, responsibilities, and communication and contact strategies in the event of a compromise including notification of the payment brands, at a minimum?</li> </ul>				
		Specific incident response procedures?				
		Business recovery and continuity procedures?				
		Data back-up processes?				
		Analysis of legal requirements for reporting compromises?				
		Coverage and responses of all critical system components?				
		Reference or inclusion of incident response procedures from the payment brands?				



PCI DSS	Question Re	esponse:	Yes	<u>No</u>	<u>Special</u> *
12.9.2	Is the plan tested at least annually?				
12.9.3	Are specific personnel designated to be available basis to respond to alerts?	on a 24/7			
12.9.4	Is appropriate training provided to staff with secur response responsibilities?	ity breach			
12.9.5	Are alerts from intrusion-detection, intrusion-preversible-integrity monitoring systems included in the incresponse plan?				
12.9.6	Is a process developed and in place to modify and incident response plan according to lessons learn incorporate industry developments?				



# Appendix A: Additional PCI DSS Requirements for Shared Hosting Providers

Requirement A.1: Shared hosting providers must protect cardholder data environment

	PCI DS	S Question Response:	<u>Yes</u>	<u>No</u>	<u>Special</u> *
A.1	Is each entity's (that is, a merchant, service provider, or other entity) hosted environment and data protected, per A.1.1 throu A.1.4 as follows:				
		osting provider must fulfill these requirements as well as all or relevant sections of the PCI DSS.			
	requ prov	e: Even though a hosting provider may meet these irrements, the compliance of the entity that uses the hosting rider is not guaranteed. Each entity must comply with the PCI and validate compliance as applicable.			
	A.1.1	Does each entity run processes that have access to only that entity's cardholder data environment, and are these application processes run using the unique ID of the entity?			
		For example:			
		<ul> <li>No entity on the system can use a shared web server user ID.</li> </ul>			
		<ul> <li>All CGI scripts used by an entity must be created and run as the entity's unique user ID</li> </ul>			
	A.1.2	Are each entity's access and privileges restricted to its own cardholder data environment as follows:			
		(a) Are the user IDs for application processes not privileged users (root/admin)?			
		(b) Does each entity have read, write, or execute permissions only for files and directories it owns or for necessary system files (restricted via file system permissions, access control lists, chroot, jailshell, etc.)? Important: An entity's files may not be shared by group.			
		(c) Do all entities' users not have write access to shared system binaries?			
		(d) Is viewing of log entries restricted to the owning entity?			

<sup>\* &</sup>quot;Not Applicable" (N/A) or "Compensating Control Used." Organizations using this section must complete the Compensating Control Worksheet or Explanation of Non-Applicability Worksheet, as appropriate, in the Appendix.



PCI D	SS Question Res	sponse:	Yes	<u>No</u>	<u>Special</u> *
	(e) Are restrictions in place for the use of these series ources?	ystem			
	Disk space,				
	Bandwidth,  Management  M				
	<ul><li>Memory,</li><li>CPU</li></ul>				
	This ensures that each entity cannot monopolize s resources to exploit vulnerabilities (for example, er race, and restart conditions, resulting in, for examp buffer overflows),	ror,			
A.1.3	Are logging and audit trails enabled and unique to entity's cardholder data environment and consister PCI DSS Requirement 10?				
	Is logging enabled as follows, for each merchant a service provider environment:	nd			
	<ul> <li>Logs are enabled for common third-party applications?</li> </ul>				
	<ul><li>Logs are active by default?</li></ul>				
	<ul> <li>Logs are available for review by the owning</li> </ul>	g entity?			
	<ul> <li>Log locations are clearly communicated to owning entity?</li> </ul>	the			
A.1.4	Are written policies and processes enabled to prov timely forensic investigation in the event of a comp to any hosted merchant or service provider?				



# **Appendix B: Compensating Controls**

Compensating controls may be considered for most PCI DSS requirements when an entity cannot meet a requirement explicitly as stated, due to legitimate technical or documented business constraints, but has sufficiently mitigated the risk associated with the requirement through implementation of other, or compensating, controls.

Compensating controls must satisfy the following criteria:

- 1. Meet the intent and rigor of the original PCI DSS requirement.
- 2. Provide a similar level of defense as the original PCI DSS requirement, such that the compensating control sufficiently offsets the risk that the original PCI DSS requirement was designed to defend against. (See *Navigating PCI DSS* for the intent of each PCI DSS requirement.)
- 3. Be "above and beyond" other PCI DSS requirements. (Simply being in compliance with other PCI DSS requirements is not a compensating control.)

When evaluating "above and beyond" for compensating controls, consider the following:

Note: The items at a) through c) below are intended as examples only. All compensating controls must be reviewed and validated for sufficiency by the assessor who conducts the PCI DSS review. The effectiveness of a compensating control is dependent on the specifics of the environment in which the control is implemented, the surrounding security controls, and the configuration of the control. Companies should be aware that a particular compensating control will not be effective in all environments.

- a) Existing PCI DSS requirements CANNOT be considered as compensating controls if they are already required for the item under review. For example, passwords for non-console administrative access must be sent encrypted to mitigate the risk of intercepting clear-text administrative passwords. An entity cannot use other PCI DSS password requirements (intruder lockout, complex passwords, etc.) to compensate for lack of encrypted passwords, since those other password requirements do not mitigate the risk of interception of clear-text passwords. Also, the other password controls are already PCI DSS requirements for the item under review (passwords).
- b) Existing PCI DSS requirements MAY be considered as compensating controls if they are required for another area, but are not required for the item under review. For example, two-factor authentication is a PCI DSS requirement for remote access. Two-factor authentication *from within the internal network* can also be considered as a compensating control for non-console administrative access when transmission of encrypted passwords cannot be supported. Two-factor authentication may be an acceptable compensating control if; (1) it meets the intent of the original requirement by addressing the risk of intercepting clear-text administrative passwords; and (2) it is set up properly and in a secure environment.
- c) Existing PCI DSS requirements may be combined with new controls to become a compensating control. For example, if a company is unable to render cardholder data unreadable per requirement 3.4 (for example, by encryption), a compensating control could consist of a device or combination of devices, applications, and controls that address all of the following: (1) internal network segmentation; (2) IP address or MAC address filtering; and (3) two-factor authentication from within the internal network.
- 4. Be commensurate with the additional risk imposed by not adhering to the PCI DSS requirement.

The assessor is required to thoroughly evaluate compensating controls during each annual PCI DSS assessment to validate that each compensating control adequately addresses the risk the original PCI DSS requirement was designed to address, per items 1-4 above. To maintain compliance, processes and controls must be in place to ensure compensating controls remain effective after the assessment is complete.



# **Appendix C: Compensating Controls Worksheet**

Use this worksheet to define compensating controls for any requirement where "YES" was checked and compensating controls were mentioned in the "Special" column.

**Note:** Only companies that have undertaken a risk analysis and have legitimate technological or documented business constraints can consider the use of compensating controls to achieve compliance.

#### **Requirement Number and Definition:**

		Information Required	Explanation
1.	Constraints	List constraints precluding compliance with the original requirement.	
2.	Objective	Define the objective of the original control; identify the objective met by the compensating control.	
3.	Identified Risk	Identify any additional risk posed by the lack of the original control.	
4.	Definition of Compensating Controls	Define the compensating controls and explain how they address the objectives of the original control and the increased risk, if any.	
5.	Validation of Compensating Controls	Define how the compensating controls were validated and tested.	
6.	Maintenance	Define process and controls in place to maintain compensating controls.	



## **Compensating Controls Worksheet—Completed Example**

Use this worksheet to define compensating controls for any requirement where "YES" was checked and compensating controls were mentioned in the "Special" column.

**Requirement Number:** 8.1—Are all users identified with a unique user name before allowing them to access system components or cardholder data?

		Information Required	Explanation
1.	Constraints	List constraints precluding compliance with the original requirement.	Company XYZ employs stand-alone Unix Servers without LDAP. As such, they each require a "root" login. It is not possible for Company XYZ to manage the "root" login nor is it feasible to log all "root" activity by each user.
2.	Objective	Define the objective of the original control; identify the objective met by the compensating control.	The objective of requiring unique logins is twofold. First, it is not considered acceptable from a security perspective to share login credentials. Secondly, having shared logins makes it impossible to state definitively that a person is responsible for a particular action.
3.	Identified Risk	Identify any additional risk posed by the lack of the original control.	Additional risk is introduced to the access control system by not ensuring all users have a unique ID and are able to be tracked.
4.	Definition of Compensating Controls	Define the compensating controls and explain how they address the objectives of the original control and the increased risk, if any.	Company XYZ is going to require all users to log into the servers from their desktops using the SU command. SU allows a user to access the "root" account and perform actions under the "root" account but is able to be logged in the SU-log directory. In this way, each user's actions can be tracked through the SU account.
5.	Validation of Compensating Controls	Define how the compensating controls were validated and tested.	Company XYZ demonstrates to assessor that the SU command being executed and that those individuals utilizing the command are logged to identify that the individual is performing actions under root privileges
6.	Maintenance	Define process and controls in place to maintain compensating controls.	Company XYZ documents processes and procedures to ensure SU configurations are not changed, altered, or removed to allow individual users to execute root commands without being individually tracked or logged



# Appendix D: Explanation of Non-Applicability

If "N/A" or "Not Applicable" was entered in the "Special" column, use this worksheet to explain why the related requirement is not applicable to your organization.

Requirement	Reason Requirement is Not Applicable
Example: 9.3.1	Visitors are not allowed in areas where cardholder data is processed or maintained.
	1