

PA-DSS Implementation Guide: Steps to ensure that your POS system is secure

About the PCI Security Standards

The PCI Security Standards Council is an open global forum, launched in 2006, that is responsible for the development, management, education, and awareness of the PCI Security Standards, including: the Data Security Standard (DSS), Payment Application Data Security Standard (PA-DSS), and PIN-Entry Device (PED) Requirements. All of the five founding credit card brands have agreed to incorporate the PCI DSS as the technical requirements of each of their data security compliance programs. Each founding member also recognizes the QSAs and ASVs certified by the PCI Security Standards Council as being qualified to validate compliance to the PCI DSS.

The PCI DSS is a multifaceted security standard that includes requirements for security management, policies, procedures, network architecture, software design and other critical protective measures. This comprehensive standard is intended to help organizations proactively protect customer account data. All businesses handling credit and debit cards are required by the card brands to maintain PCI DSS compliance.

The PA-DSS is a security standard designed to help software vendors develop secure payment applications that do not store prohibited data, such as full magnetic stripe, CVV2 or PIN data, and ensure their payment applications support compliance with the PCI Data Security Standard. All payment applications handling credit and debit cards are required by the card brands to maintain PA-DSS compliance.

For more information on the PCI standards, visit <http://www.pcisecuritystandards.org>

Implementing VersiTouch POS Securely

Of the PA-DSS and PCI DSS criteria that determine the security level and ultimate compliance of your POS system, six areas stand out as requiring particularly close attention: storing card data, user management, logging, wireless network considerations, remote access and encryption over public networks.

Software Version and Troubleshooting

All configuration steps and examples in this document apply to version 10.10.22 (or newer) of the VersiTouch POS software suite. If you are using an older version of VersiTouch, it is highly recommended that you upgrade to the newest release.

The support staff at VersiTouch has a series of security policies in place when assisting clients with troubleshooting sensitive credit card related issues of the VersiTouch POS suite (specifically VersiTouch POS, VersiTouch Office, VersiTouch Credit, and VersiTouch Credit Access). The current software versions of the VersiTouch POS suite encrypt all sensitive credit card data at every stage of processing. Older versions, however, did not support adequate encryption at all stages. Therefore, as a general policy, any POS data that is sent from a merchant to VersiTouch must first be encrypted before transmitted (whether email, IM, SMS, or any other electronic means of transmission) using a utility such as WinZip. Any encryption keys or passwords must not be transmitted via email. It is the policy of VersiTouch that passwords must be provided via telephone. The support staff at VersiTouch will permanently and securely delete any electronic client data with a 3rd party utility once troubleshooting has been completed.

The VersiTouch Point-of-Sale suite does not store sensitive authentication data. If a user somehow captures this information, it must only be collected when needed to solve a specific problem. It must be stored only in specific, known locations with limited access. Only a limited amount of such data should be collected as needed to solve a specific problem. Sensitive authentication data must be encrypted while stored and must be securely deleted immediately after use.

Storing Sensitive Card Data

VersiTouch POS does not support the capture of CVV2 or PIN data nor does it store full magnetic stripe. VersiTouch POS encrypts and stores sensitive card data (specifically, cardholder name, primary account number, and expiration) indefinitely to allow a merchant time to verify that deposits have been received. There are no debugging or troubleshooting settings that permit sensitive data to be electronically stored in an unencrypted fashion.

VersiTouch, Inc. strongly recommends the removal of sensitive card data immediately after deposits are verified. The VersiTouch Credit Access utility has a function that will sanitize all daily storage files by overwriting: all but the last four digits of the primary account number; all but the first and last initial of the cardholder name; and the entire expiration. This function defaults to remove all but the most recent 14 days of activity. Failure to remove stored credit card data beyond when such storage is required for business purposes will invalidate your PCI compliance efforts. This method for removing sensitive data should be used to sanitize data stored by any previous versions of the VersiTouch POS. The VersiTouch POS storage files that may contain sensitive cardholder data are located in x:\rcs\storage.

Storing sensitive card data through alternate means should be avoided whenever possible to avoid risk of theft and to minimize PCI compliance requirements. If you must store sensitive card data for a valid business reason, you must ensure you're not storing information deemed prohibited for storage by PCI such as full magnetic stripe, CVV2 or PIN data. If you are storing full account numbers, the card data must be properly encrypted and protected as defined by the PCI Data Security Standard.

Encrypt Sensitive Traffic over an Internet Connection

VersiTouch POS supports two payment card processing services for merchants who wish to utilize a broadband or internet connection. These two services are Mercury Payment Systems and Heartland Payment Systems.

Mercury: VersiTouch POS uses the Datacap DSIClientX to send transactions containing card data over the internet to Mercury's servers for payment processing. The DSIClientX is the client component of the Datacap NETePay solution, a PABP 1.3 validated product. The transmission is encrypted using SSL and an approved strong encryption protocol.

Heartland: VersiTouch POS uses the DLL provided by Heartland Payment Systems to send transactions containing card data over the internet to Heartland's Exchange network servers for payment processing. The transmission is encrypted using SSL/TLS and an approved strong encryption protocol.

Attempting to send sensitive card data through alternate means should be avoided whenever possible to avoid risk of theft and to minimize PCI compliance requirements. If you must send sensitive card data for a valid business reason, you must ensure you're sending it encrypted using secure encryption transmission technology (e.g. IPSEC, VPN, SSL/TLS). In all instances where manual encryption has been applied to cardholder data, any encryption keys or passphrases must be sent in a secondary (preferably verbal) communication. VersiTouch v10.10.22 does not require or support the transmitting of sensitive card data over end-user messaging technologies (e.g. IM, SMS, TXT).

Remote Access

VersiTouch POS does not require or support the use of remote access or any other form of remote administration (e.g. Telnet). If a remote access solution is implemented, the criteria listed within this selection must be followed.

If you use an alternate administration interface over the network (e.g. administrative web page, telnet) to access your payment processing environment, the traffic must be encrypted with a secure encryption technology (e.g. SSH, VPN, or SSL/TLS) to maintain PCI DSS compliance. This access must only be enabled on an as-needed basis and must be disabled when the needed maintenance or configuration has been completed. All remote access features or services must be manually enabled and must never be left in an "always on" state.

If you require the use of traditional remote computer or network access, it must meet the following requirements to maintain PCI DSS compliance.

- Incorporate a personal firewall (this solution can be hardware or software) on the computer that is remotely connected. This firewall must be present for any type of remote access connection, including VPN.
- Do not use remote access solutions requiring "port forwarding" such as VNC and PCAnywhere.
- Incorporate two-factor authentication for remote access. Use technologies such as RADIUS, TACACS with tokens, or VPN with individual certificates assigned to each user.
- Develop usage policies for critical employee-facing technologies (for example, remote-access technologies, wireless technologies, removable electronic media, laptops, personal data/digital assistants (PDAs), e-mail usage and Internet usage) to define proper use of these technologies for all employees and contractors. Ensure these usage policies require the following:
 - Explicit management approval and authentication for use of the technology
 - A list of all such devices and personnel with access
 - Labeling of devices with owner, contact information, and purpose
 - Acceptable uses of the technology
 - Acceptable network locations for the technologies
 - List of company-approved products

- Automatic disconnect of sessions for remote-access technologies after a specific period of inactivity
 - Activation of remote-access technologies for vendors only when needed by vendors, with immediate deactivation after use
 - When accessing cardholder data via remote-access technologies, prohibit copy, move, and storage of cardholder data onto local hard drives and removable electronic media
- If vendors, resellers/integrators, or customers can access customers' payment applications remotely, the remote access must be implemented securely

Required remote access security features include:

- Change default settings in the remote access software (for example, change default passwords and use unique passwords for each customer)
- Restrict incoming connections, allowing only those from specific (known) IP addresses
- Use strong authentication, implementing accounts that are unique and specific to each user accessing the system.
- Enable encrypted data transmission using a strong level of encryption such as SSL/TLS or IPSEC.
- Enable a timeout of 15 minutes or less for idle sessions. Password reentry must be required to re-initiate the session.
- Enable account lockout after six failed login attempts. Accounts must remain locked out for a minimum of 30 minutes until a new login attempt may be made.
- Configure the system so a remote user must establish a Virtual Private Network ("VPN") connection via a firewall before access is allowed
- Enable logging functions
- Restrict access to customer passwords to authorized reseller/integrator personnel
- Establish customer passwords with the following requirements:
 - Passwords must contain a combination of alphabetic and numeric characters.
 - Passwords must have a minimum length of 7 characters.
 - Passwords must be unique from the previous four used.
 - Passwords expire and must be reset every 90 days.

VersiTouch has evaluated several remote access solutions, comparing cost, convenience and security features that meet PCI compliance requirements for remote access. VersiTouch recommends the use of LogMeln Central with free or professional client packages. LogMeln accounts need to be configured for two-factor authentication.

For more information, visit LogMeln at: <http://www.LogMeln.com>

Wireless Networks

VersiTouch POS does not require the use of a wireless network and we advise against using one. If you set up or have a preexisting wireless network, take the following precautions to remain PCI compliant.

- If the wireless network is not used by your payment processing systems, make sure that a firewall prevents access to the payment processing systems.
- Wireless networks attached to your payment processing network MUST meet the following PCI DSS requirements:
 - As of April 1, 2009, all newly deployed wireless networks must be using WPA or WPA2 encryption.
 - Existing wireless setups must use WPA or WPA2 encryption when it's an available option. Some older wireless equipment lack WPA support, but almost all can be updated through firmware and driver updates made available on the manufacturer's web-site.

- In the rare case when there are no available updates from the manufacturer that add WPA or WPA2 support, WEP must be used. Those devices must be replaced with newer equipment and the encryption changed from WEP to WPA or WPA2 encryption by July 1, 2010.
 - The default WPA/WPA2 encryption key must be changed to a unique strong key.
 - The default password for accessing the Wireless Access Point's settings must be changed to a unique strong password.
 - Change default SNMP (Smart Network Management Protocol) community strings on Wireless Access Points if SNMP is supported or disable SNMP altogether.
 - Synchronize the access points' clocks to be the same as your computers to ensure logged timestamps match.
- Wireless networks attached to your payment processing network are HIGHLY RECOMMENDED to enable additional security:
 - Do not wait for the July 2010 deadline to update from WEP to WPA. WEP is extremely insecure. Easy to use tools are readily available that only take minutes to discover the WEP key. These tools have been employed for the last several years by criminals to access business networks, leading to several data breaches.
 - Use wireless keys of 13 random characters containing letters, numbers, and symbols. Keys comprised of words or names are quickly found by criminals using readily available, easy to use tools.
 - Disable SSID Broadcast to make your wireless network less visible to unauthorized users.
 - Use MAC address filtering so that only authorized computers are allowed access to the wireless network.
 - When configuring WPA or WPA2, use the AES option. Only use TKIP when AES is not an available option. Although not severe, there are known weaknesses in TKIP.

More information on network segmentation can be found in the section, Network Basics and Segmentation. Recommended network configuration diagrams are available in Appendix A, Recommended Network Configurations. For a more thorough explanation regarding setting up wireless networks, review the PCI DSS Wireless Guidelines document listed on the PCI Security Council's website:

https://www.pcisecuritystandards.org/pdfs/PCI_DSS_Wireless_Guidelines.pdf

Network Basics and Segmentation

Switches are network devices that allow you to connect together multiple computers, routers, and wireless access points, firewalls, etc. Switches have multiple network ports, one for each item connected using a network cable. All devices connected to the same switch can communicate with each other unobstructed.

Firewalls are network devices that allow you to protect a network segment on the LAN (Local Area Network) side from the network segment on the WAN (Wide Area Network) side. Although they can cost up to \$70,000, there are inexpensive (\$40-\$100) small routers containing firewall functionality that can be found at any store containing computer equipment. These inexpensive routers will work sufficiently so long as they support Stateful Packet Inspection (SPI).

Network segmentation is a strategy intended to simplify PCI compliance of your network and to help you protect your business from hackers. At the most basic level, there are three zones representing three levels of risk.

Untrusted Environment – Network connections that anonymous people have access to are considered “untrusted.” They should have no network access to your business computers and POS equipment. Business computers should never be connected directly to this zone. Common untrusted networks are the internet connection itself, customer wireless internet access, and visitor network connections. This is the highest risk zone because anybody can connect to it anonymously. Systems connected to this zone are commonly hacked or get infected with malware and viruses.

Non Card Data Business Environment – Systems not used for payment processing, but are still business owned fit into this segment. These are systems that can be used for email, web browsing, and other higher risk activity that you would never want to perform on your payment processing systems. On occasion, these systems will almost certainly become infected with malware and viruses. Once a computer in this zone is infected, the hacker or infection will spread to other systems if they're not protected by a firewall. Note that if any systems in this zone handle credit card data, that data is being put at risk. This is a medium risk zone due to risk of occasional infection. By segmenting these systems into their own zone, the breach is contained. The hacker, malware, or virus doesn't reach your firewall protected payment processing zone.

Card Data Business Environment – Systems used for payment processing fit into this segment. These systems should only be used for POS activity and should NEVER be used for any other reason. Should these computers become infected with malware or viruses, sophisticated hacking tools can potentially steal sensitive data such as credit cards. The average cost of a breach for a small merchant is \$36,000. This is a low risk zone because it's protected from the other two zones and high risk activities such as web browsing and email do not occur inside it. The chance that hackers, malware, or viruses spread to these systems is minimal.

In summary, to segment your network for security you should:

- 1) Protect both business environments from the untrusted environment
- 2) Protect your card data business environment from the non card business environment

For simple network diagrams to help guide your network configuration, see Appendix A, "Recommended Network Configurations" and the "VersiTouch Firewall Guide" document.

User Management

It is highly recommended that full administrative access to the computer running VersiTouch Office, VersiTouch Credit and VersiTouch Credit Access be restricted to a single account. This administrator account should be managed by a single person and not shared with additional users. Users who need regular access to this machine as part of their normal job duties should be limited to read-only access to both the C:\RCS and Windows system folders to prevent any unwanted editing or deletion of critical data.

The only way a user can view or print decrypted sensitive credit card data stored by VersiTouch POS is through the VersiTouch Credit Access utility. VersiTouch POS, VersiTouch Office, and VersiTouch Credit do not allow a user to access full unencrypted sensitive credit card data. These products mask all but the last 4-digits of the primary account number in reports and log files.

VersiTouch Credit Access requires product activation by VersiTouch, Inc. that links the activation code to a unique hardware license key. Before VersiTouch will provide this activation, an owner/officer of the merchant must validate her/his identity. The user must then obtain a single-use temporary administrator activation code. When first installed VersiTouch Credit Access uses a single-use limited-access default administrator account with the username: "VersiTouchAdmin" and a default password: "versitouchcredit". The default account allows the operator to create a new administrator user account and password. The default temporary administrator is deactivated upon logout.

Each user must have a unique user ID and password. Do not use group, shared or generic accounts or passwords. Users should never share their passwords with anyone else.

Knowledge of encryption keys should be split between two users. In addition, the encryption access key must be stored on a separate server or memory device, such as the hard drive in another PC on the network or a USB thumb drive. Any PCs that run VersiTouch POS, VersiTouch Credit, VersiTouch Office, or VersiTouch Credit Access must have continuous access to this location.

It is highly recommended to disable or delete inactive or terminated user accounts immediately to prevent access. Although immediate action is recommended, for PCI compliance, this absolutely must be done within 90 days.

These requirements are for PA-DSS compliance and automatically maintained by VersiTouch Credit Access. They apply to all user accounts with access.

- Passwords must be at least seven characters
- Passwords must contain both numeric and alphabetic characters
- Passwords must contain at least one upper case and one lower case letter
- Passwords must be changed at least every 90 days
- Passwords must not be the same as the last four used
- Failure to login six times in a row will result in the account being locked out for 30 minutes
- After a user idle time of 15 minutes, the password must be re-entered

Additionally, Windows user accounts should be configured to meet these secure authentication requirements for PCI DSS compliance.

Logging

VersiTouch Credit Access logging is enabled upon startup and cannot be disabled. It logs the following information for access to sensitive PCI data:

Access types, including:

- All invalid logical access attempts
- Actions taken by users, including login/out
- Addition, deletion, or modification of users and their assigned functions
- Access to decrypted cardholder data
- Removal of sensitive PCI data from daily storage files
- Access to audit trails
- Changes to encryption keys

Entries include:

- User identification
- Date and time of each event
- Type of access with success or failure indication

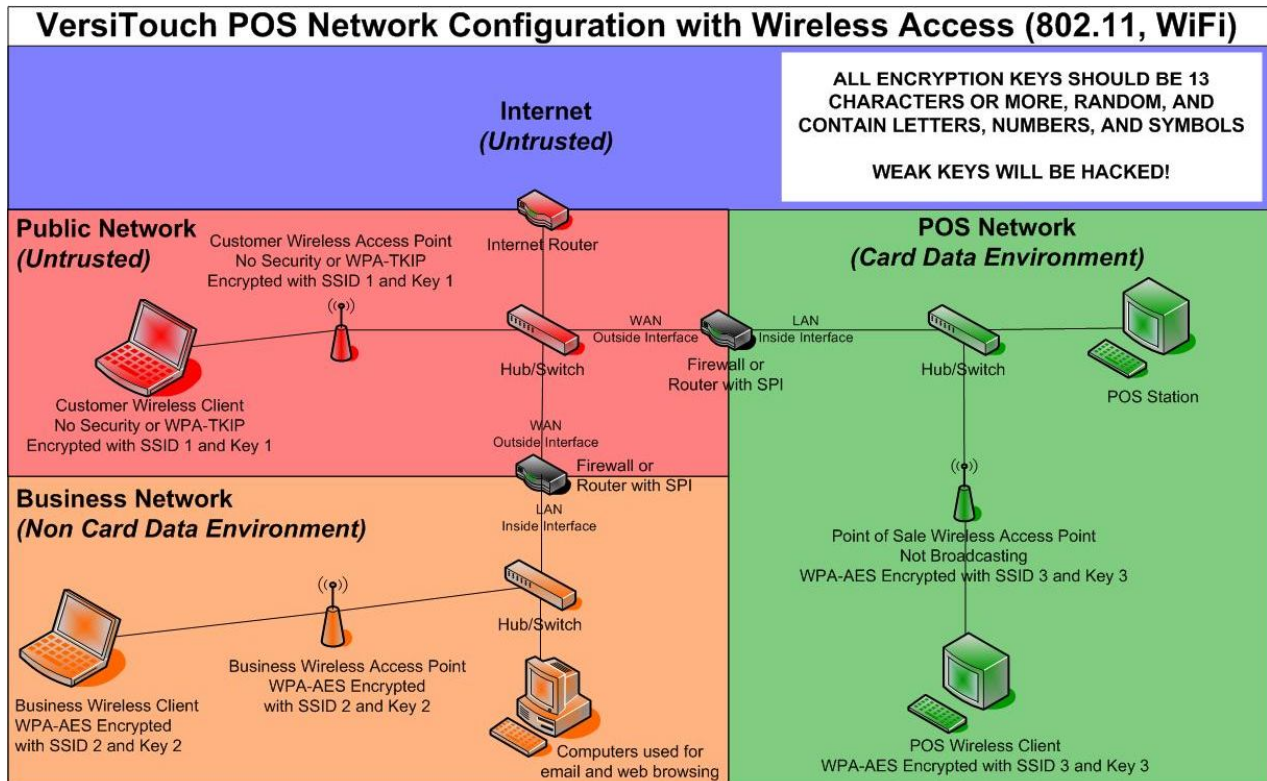
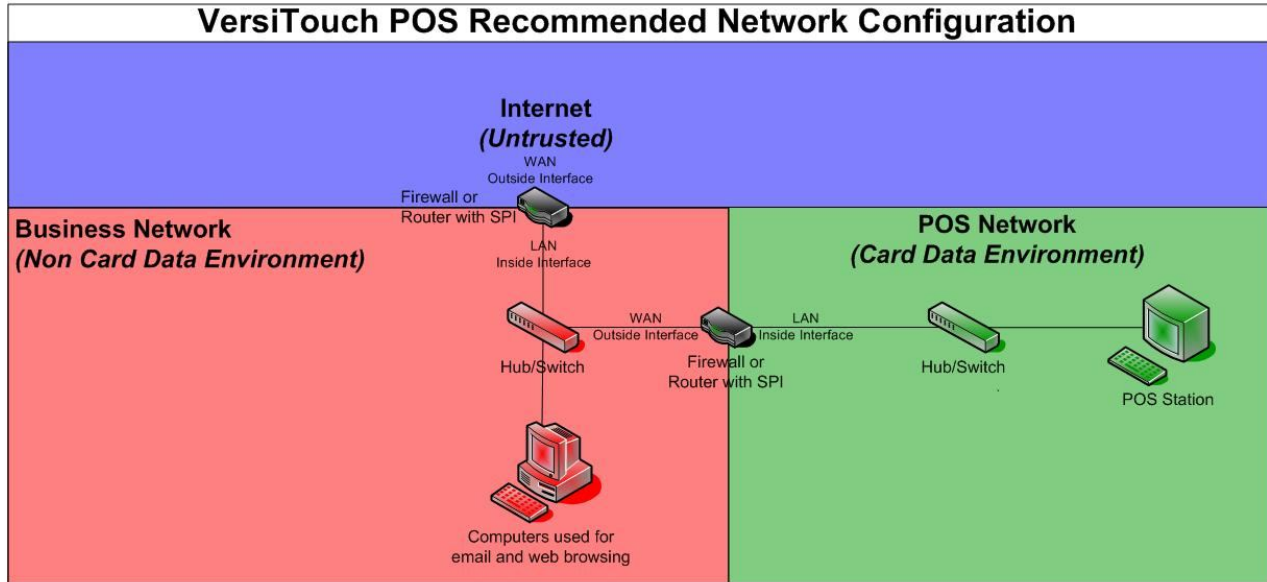
The VersiTouch Credit Access log is contained within a private database and is located on the POS fileserver in "C:\RCS\VCA\DATA\CAADATA.DTA".

For PA-DSS compliance, log files must have access controls applied so that only authorized users can modify them. Additionally, the Windows Security Event Log will need to be configured to log access to the VersiTouch Credit Access log files. A review of both the Windows Security Event Log and the VersiTouch Credit Access log files will give you a clear picture which details when files have been modified or removed from the system. To enable these settings, follow the steps provided in Appendix B, Log file Security Settings. Not applying these settings or disabling them can result in non PCI DSS compliance. The Windows Security Event Log entries includes:

- Initialization of audit trails
- User identification
- Date and time of each event

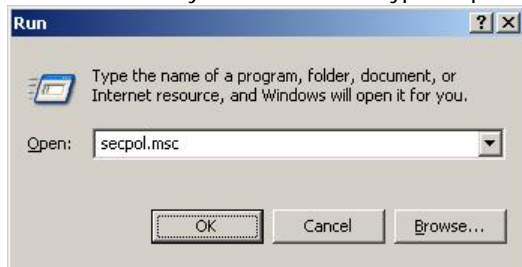
- Origination of the event
- Type of access with success or failure indication
- Creation and deletion of system-level objects
- Names of affected resources

Appendix A: Recommended Network Configurations

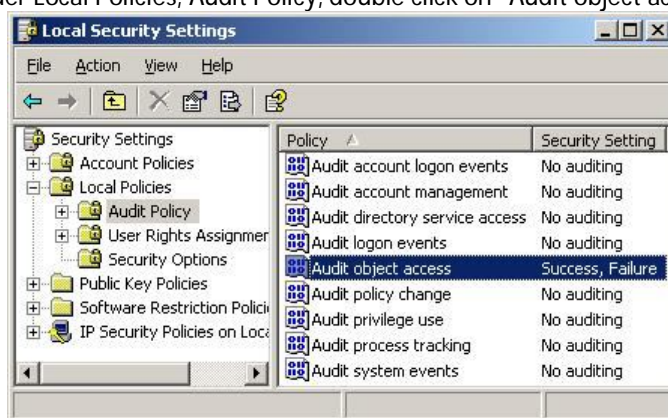


Appendix B: Windows Log file Security Settings

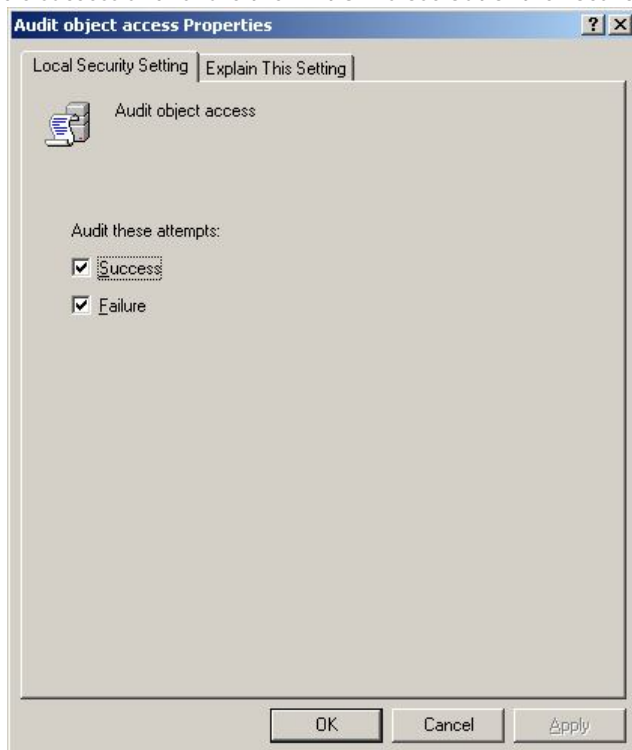
- 1) Go to the Run line in your Start menu. Type secpol.msc and hit the OK button.



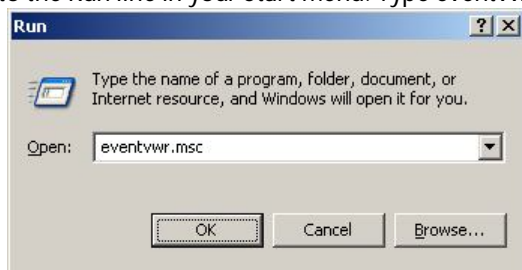
- 2) Under Local Policies, Audit Policy, double click on "Audit object access".



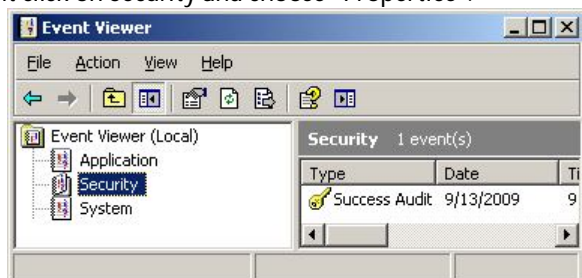
- 3) Enable success and failure then hit OK. Close out of the Local Security Settings window.



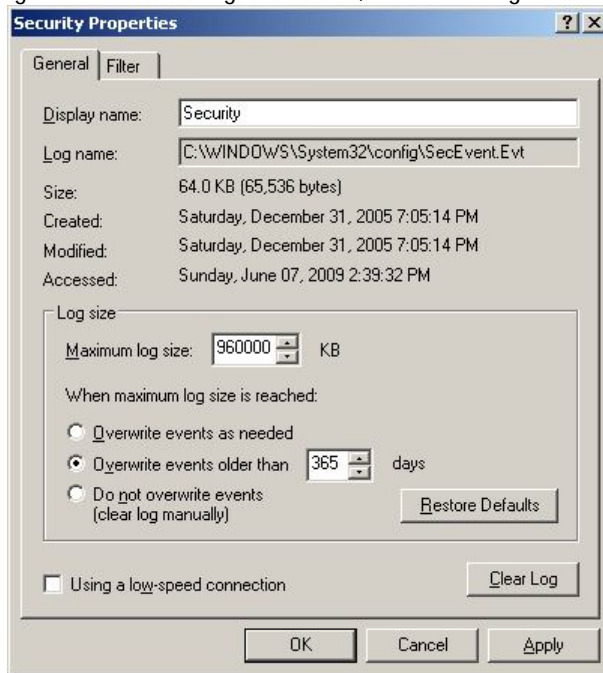
- 4) Go to the Run line in your Start menu. Type eventvwr.msc and hit the OK button.



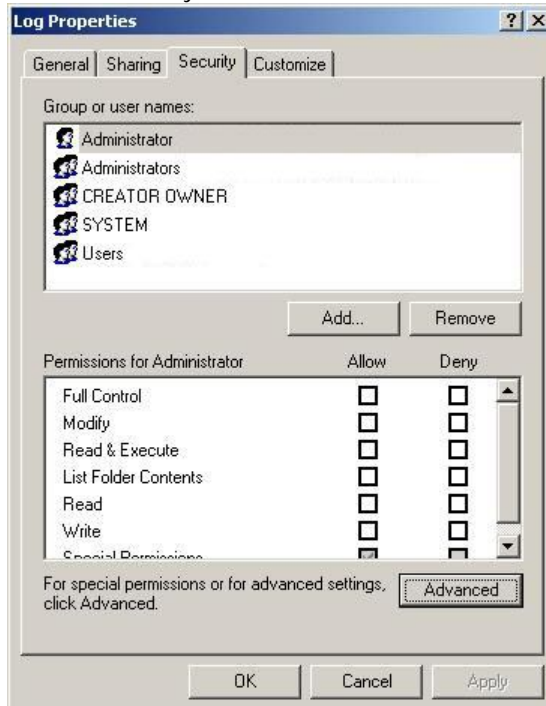
- 5) Right click on Security and choose "Properties".



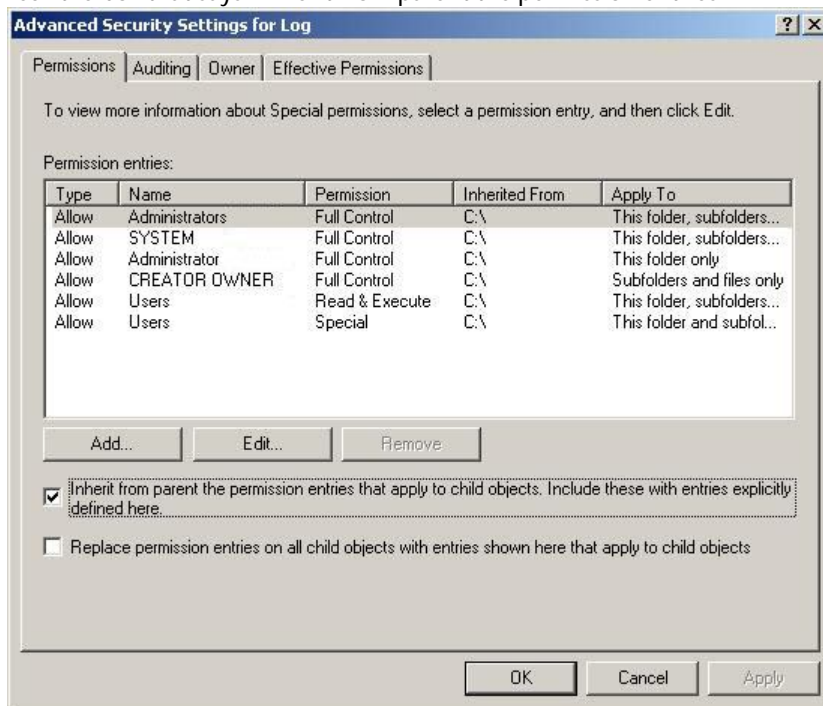
- 6) Change the maximum log size to 960,000 KB. Configure to overwrite events older than 365 days. Hit OK.



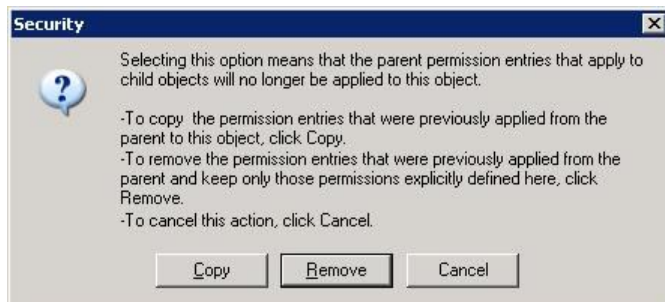
- 7) Navigate to the parent folder of the log file. The log file location is "C:\RCS\VCA\DATA\CAADATA.DTA", so you would navigate to "C:\RCS\VCA".
- 8) Right click on the DATA folder and choose Properties.
- 9) Switch to the Security tab and click on Advanced.



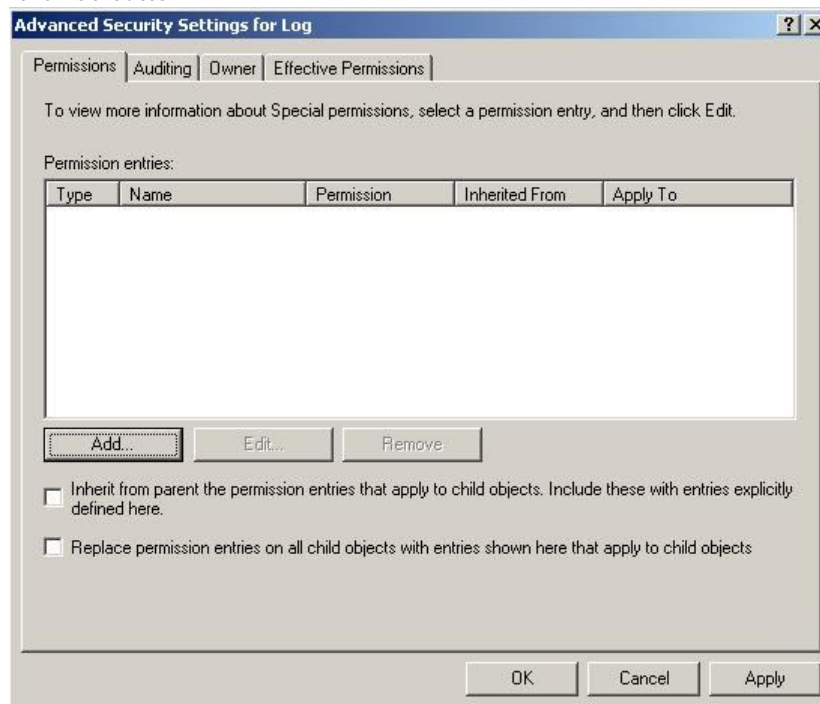
10) Uncheck the box that says "Inherit from parent the permission entries..."



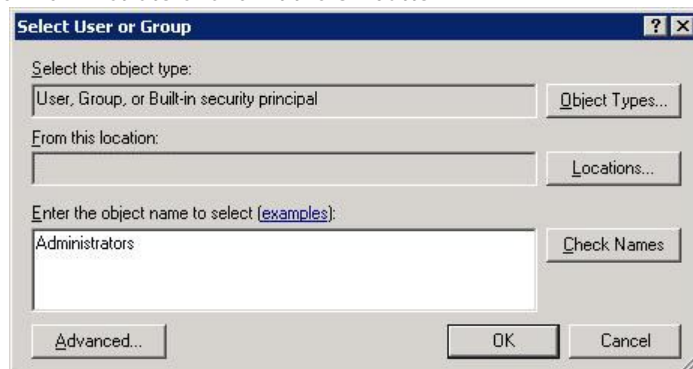
11) Click the Remove button.



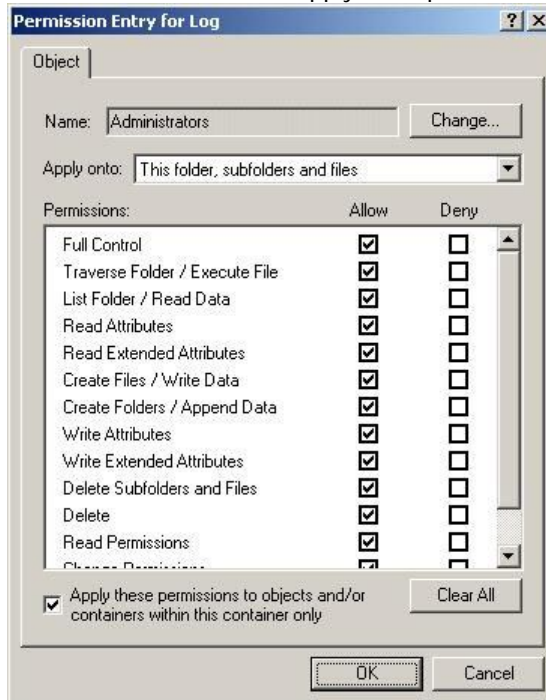
12) Click the Add button.



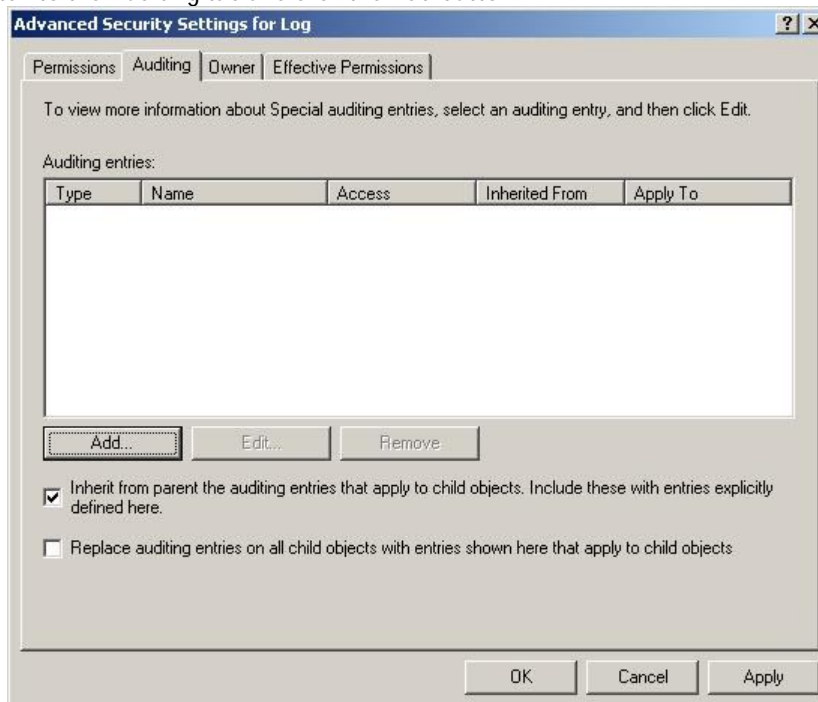
13) Type "Administrators" and hit the OK button.



- 14) Check the box to Allow Full Control. All the boxes below will automatically be selected.
- 15) Check the box at the bottom, "Apply these permissions to objects..." and hit the OK button.



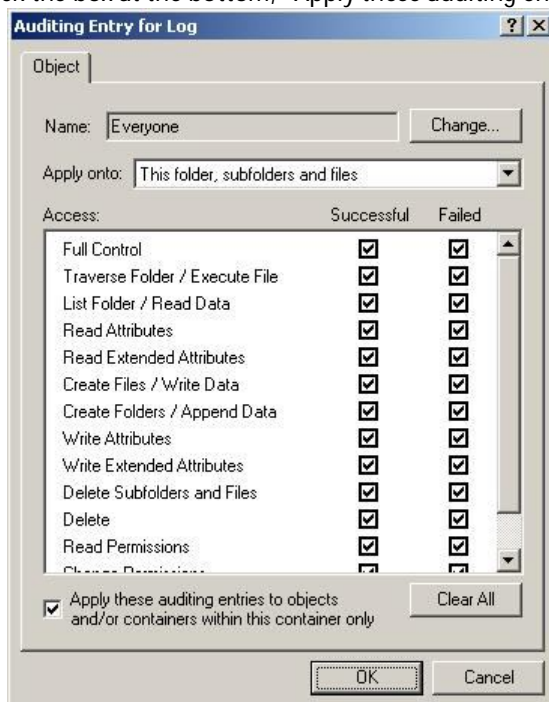
- 16) Repeat steps 12-15 for any additional accounts that need access. If you run VersiTouch Credit Access under non-administrative Windows user accounts, they'll need to be added as well.
- 17) Switch to the Auditing tab and click the Add button.



18) Type "Everyone" and hit the OK button.



19) Check the Full Control Successful and Failed boxes. All the boxes below will automatically be selected.
20) Check the box at the bottom, "Apply these auditing entries to objects..." and hit the OK button.



21) Hit OK on the remaining dialogue boxes to close them all.