

Primary Account Number (PAN) Masking Policy

Overview

In accordance with the Payment Card Industry Data Security Standards (PCI DSS) requirements, the Office of Information Security has established a formal policy and supporting procedures concerning the masking & displaying of the Primary Account Number (PAN). This policy is to be implemented immediately. It will be evaluated on an annual basis to ensure its adequacy and relevance.

Policy

The Office of Information Security will ensure that the masking & displaying of the Primary Account Number (PAN) adheres to the following conditions for purposes of complying with the Payment Card Industry Data Security Standards (PCI DSS) initiatives (PCI DSS Requirements and Security Assessment Procedures):

- Mask PAN when displayed (the first six and last four digits are the maximum number of digits to be displayed), such that only personnel with a legitimate business need can see the full PAN.
- A list of roles that need access to displays of full PAN is appropriately documented, along with a legitimate business need for each role having access to such information.
- All other roles not specifically authorized to see the full PAN must only see the masked PAN.
- Appropriately configure, examine, and confirm system settings and all necessary configurations for system components to ensure that the full PAN is only displayed for users/roles with a documented business need, and that PAN is masked for all other requests.
- Appropriately configure, examine, and confirm system settings and all necessary configurations for system components to ensure that PANs are masked when



displaying cardholder data, and that only those with a legitimate business need are able to see the full PAN.

Responsibility for Policy Maintenance

The Office of Information Security is responsible for ensuring that the aforementioned policy is kept current as needed for purposes of compliance with the Payment Card Industry Data Security Standards (PCI DSS) initiatives.

Revision History

February 8, 2019 (Policy Created)

July 15, 2019 (Policy Modified)

Adapted from Stanford University's PCI DSS Policies 1-2019