



Compliance is not enough

Thomas Leeb
Director Business Development
CSP EMEA



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About CSP

- Based in Toronto, Canada.
- NonStop® DSPP Partner since 1987.
- Develop, Support and Distribute Security and Audit Solutions for the HP NonStop® Market.
- Over 250 Customers and over 1000+ licenses World Wide
- Customers include:
 - Largest Banks
 - Major Stock Exchanges
 - Defense and Healthcare organizations
 - Telecommunications
 - Manufacturers











Agenda / Why should you care ?

- Data breaches and resulting costs still increasing
- PCI DSS
 - Has it really helped to improve security ?
 - What are observations and learnings so far ?
 - Lessons from the "Heartland" case
- Approaching Security
 - Security = minimise risk = decrease probability * decrease impact
 - So how to approach it, and how to deal with PCI DSS then ?
 - Establishing a solid ISMS
- CSP and how to address the 2 dimensions



Costs resulting from Data Breaches

Source: Ponemon Institute (Study 2009)

- Overall Costs continue to rise
- Study 2009: 45 US organisations from 15 different industry sectors
- Avg. Costs per organisation: 6,75M\$ (204 US\$ / rec)
- Largest case 101.000 records 31 M\$ in breach related costs (or 307 US\$ / rec)
- increasing focus on implementing automated IT-security solutions
 - Identity and access management solutions
 - Expanded use of encryption
 - Dataloss prevention solutions
 - Endpoint security solutions
- Data breaches from malicious attacked doubled from 2008 to 2009
 - "data-stealing" malware increasing
- Organisational Leadership
 - Companies without CISO (or similar) experience 50% higher costs



Data breach affected millions of shoppers

Source: Computerworld

- Intrusion into computer network of supermarket chain (Maine, US)
- Forced banks to reissue millions of credit and debit cards
- MBA reported 70 of its member banks were contacted by Visa, MC
- 4.2M Credit & debit card numbers stolen during transmission
- Included data from magnetic stripe
- Hannaford instructed consumers to check their card statements
- Felt they met and in many cases exceed industry standards on security measures
- Now "committed to take whatever steps may be necessary" to enhance security



Source: Computerworld

- Hackers broke into database to get personal data
- 1.5 M cardholders affected
- Social security numbers of 1.1M individuals may have been accessed
- Information included financial data on payroll cards
- Personal information "may" have been affected
- Feb 6th: coordinated attack on Nov 8th by "cashers" withdrawing 9M\$ using counterfeit cards on 130 ATMs, in 49 cities, within 30 minutes
- Hackers able to mess with card limits? (100 cards)
- FBI spokesman: "People are out there attacking computers every day, but this one is different in scope, timing and coordination of the attack."



Jan 20, 2009 : Heartland – Card processor victim of largest data breach

Source: Computerworld

- Visa, MC alerted about suspicious transaction activity, Heartland found evidence of malicious software compromising data
- Forensic exams has shown multiple instances across their network
- Processing >100M tx/mth for >250k merchants and hundrets of banks
- Included card numbers, exp and Track-2 data
- Dropped from PCI compliance by Visa
- Gartner:
 - "Cybercrooks are increasingly targetting payment processors.
 Attacking processors much more serious than retailers"
 - "More radical moves required, PCI is clearly not enough"
- Feb 13th: over 440 financial institutes affected in 40 U.S. states, Canada and outside, lawsuits ongoing – meanwhile corrected to 673
- May 2009: Intrusion occured in May 2008, not detected until Jan
- Oct 5th, 09: breach believed to have started in Dec 2007 already



PCI DSS – some observations

Source: Computerworld (related to Hearing at US House of Representatives)

- "PCI DSS has done little to stop payment card data thefts"
- "the standard is clearly not enough to protect cardholder data"
- Hannaford
 - certified just one day after they were informed about the system intrusions.
 - received PCI certification while intrusion was in progess.
- RBS Worldpay and Heartland were both certified prior breaches.
- Voices of US retailers :
 - "Card issuers are requesting us to store card data. When a breach happens, we are the ones who bear the costs and who are demonized."
 - "PCI has been developed developed from the perspective of card companies as opposed to from that of those who are epected to follow them."
 - "PCI is little more than a tool to shift financial risks off card companies and banks. We are forced to spend billions to implement a standard, which has done little to improve security."



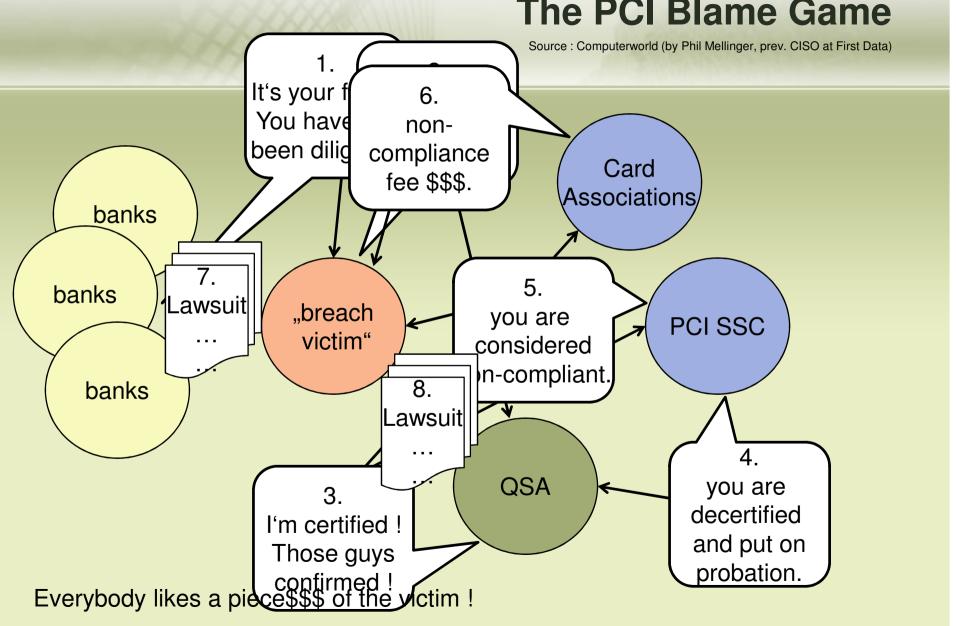
PCI DSS – observations (cont)

Source: Computerworld (related to Hearing at US House of Representatives)

- PCI SSC: "breached organisations were not "compliant" at the time of the breach."
- VISA:
 - "The ,Heartland case' never should have happened and is unfortunate, but this
 does not make me question the tools."
 - "However it's time for security controls to go beyond what's included in PCI now
- VISA working with banks and retailers to test new security measures
- New degree of uncertainty about the future of PCI specifications
- Growing chorus of doubt about effectiveness of PCI



The PCI Blame Game





Prepare for the "third" attack wave

Source: Computerworld (by Phil Mellinger, prev. CISO at First Data)

• Phase 1 (1990's)

first cyber attack wave aiming at Internet merchant databases

Phase 2

- PCI DSS was introduced post millenium,
- hackers already "hooked on" cash and updating their weapons
- If stores would no longer store card data, attackers would use sniffing technology to read them while in transit
- Breach-funded attackers improved their skills to yet unknown levels

• Phase 3 (2005 – now)

- trojans became invisible to firewalls, AV tools
- Botnet controllers scaled up to manage massive numbers of infected PCs
- Key-logging techniques perfected to collect valuable browser input
- Undetectable trojans organised into huge botnets efficiently collecting data
- Targets increasingly online financial institutions
- Attackers quickly morph trojans to new and yet again undetectable variants
- Russian cyber attackers meanwhile outsource cyber-attacks to China



What can be done?

Source: Computerworld (by Phil Mellinger, prev. CISO at First Data)

Stop the blame game

- infights, litigation, fines over breach responsibility is not useful
- Reward the ones in the industry, who identify weaknesses rather than punish the attack victims
- PCI rules must evolve to address "3rd wave" attacks
- Improve fraud intelligence to understand attackers and their weapons
 - "No longer sufficient to monitor internet chat rooms"
 - Now the task is to infiltrate the attackers

International laws

- If domestic law enforcements are not dealing with the attackers operating within their borders, create ability to hold those countries accountable
- Countries, who "protect" cyber-attackers are no different than those providing safe heavens for terrorists
- New security approaches and tools required to thwart attacker's weapons.



Lessons from the "Heartland" case

Source : Computerwork

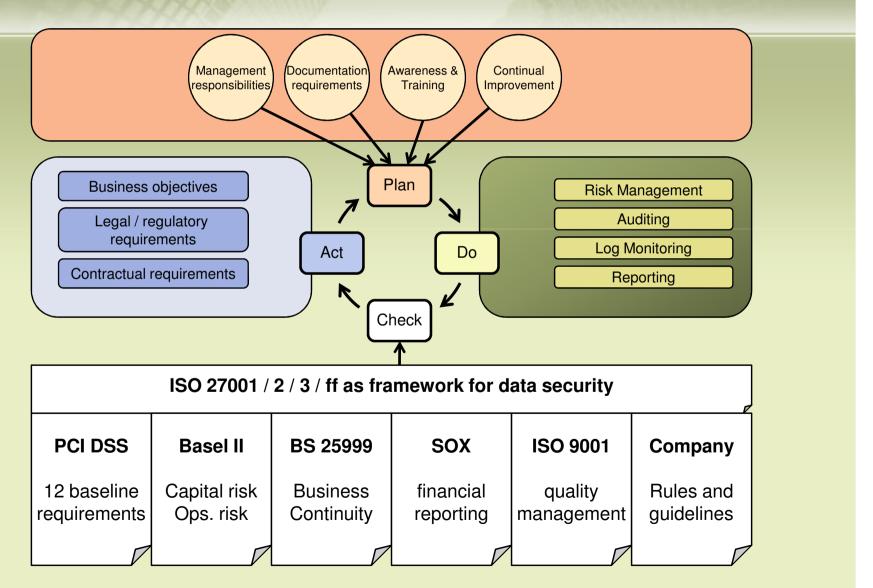
- "The QSA's let us down"
- "...had implemented each and every security control of the PCI standard...."
- "industry standard security controls do little to stop lawsuits against you for <u>negligence</u>…"
- Compliance is <u>not</u> taking away any responsibility from you
- When things go wrong, you are (b) eaten by your contracted partners
- Passing a PCI compliance audit does not make you secure
- The QSA factor

However:

- there is no way around PCI it remains a contractual obligation
- Compliance is not an option
- Opportunity / Risk



ISMS using a unified Compliance framework





The 2 Dimensions of Reducing Risk

Reduce Probability of Incident

- Authentication control
- Access restriction policies
- Password mangement
- Encryption
- Usage restricition of administrative tools
- Time based access control
- Change control procedures
- Software updates
- Vulnerability management
- Policies for reporting weaknesses

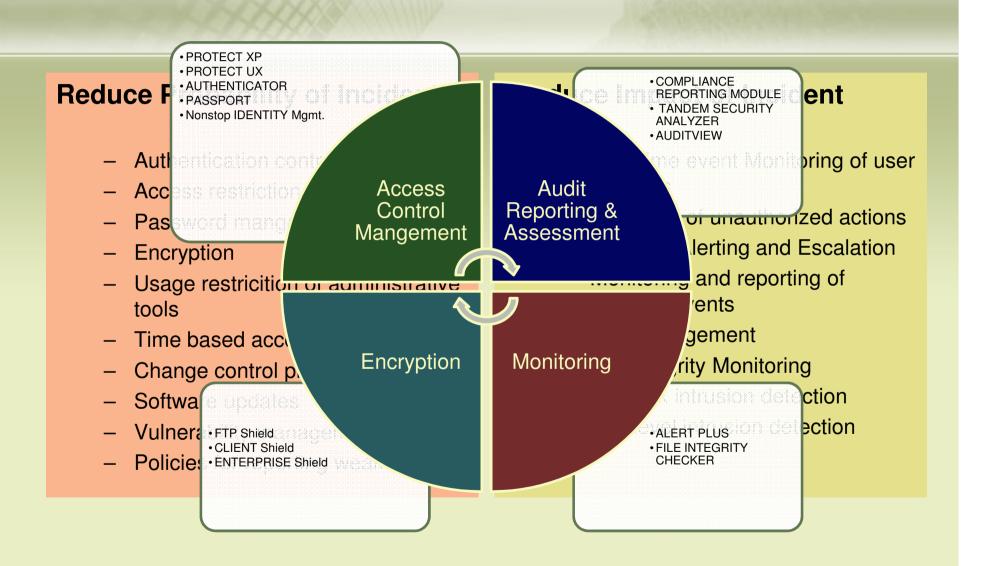
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Reduce Impact of Incident

- Real time event Monitoring of user activities
- Detection of unauthorized actions
- Filtering, Alerting and Escalation
- Monitoring and reporting of security Events
- Log Management
- File Integrity Monitoring
- Network intrusion detection
- O/S level intrusion detection
- **–** ...



CSP Solutions of interest to you!





Thank you!

We can't solve problems by using the same kind of thinking we used, when we created them.

(Albert Einstein)

For additional information please contact

Thomas Leeb (CSP EMEA) thomasl@CSPsecurity.com

+43 699 1856 3888