Office of Finance and Treasury
How to Accept & Process Credit and Debit Card Transactions

1) Only authorized and properly trained individuals can process credit or debit card transactions and access systems or reports containing credit or debit card information. A list of authorized individuals and their job title must be provided to Cash and Investment Services, and updated annually.

2) Individuals who handle or process credit and debit card information at Princeton University:
   a) Must be authorized by their appropriate academic or administrative department manager, dean or director.
   b) Must be trained in the proper handling of credit or debit card information. This requirement shall be met by completion of the University’s PCI Compliance Training Program available through the Princeton University Employee Learn Center.
   c) Must be familiar with, and adhere to, the University’s Information Security and Acceptable Use Policy.
   d) Must protect cardholder information in accordance with PCI-DSS.
   e) Must pass a criminal background check.
      i) Job descriptions for any position with responsibilities that include handling or processing cardholder data, or maintaining systems that contain cardholder data, must specify that passing a background and credit check is a requirement for the position.
      ii) In cases where a background check returns outstanding issues, the appropriate department manager, dean or director must review those issues with Human Resources and the Office of the General Counsel to determine whether or not the individual should be permitted to handle cardholder data.
      iii) Exceptions to this requirement may be granted by Cash and Investment Services only if an individual processes over-the-counter or over-the-phone credit or debit card transactions, and does not have access to lists, reports and/or storage areas with cardholder data.

3) University Systems and Applications containing cardholder data
   a) Must limit access to only those individuals whose jobs require such access. User privileges must be based on job function, and access rights for privileged user IDs must be restricted to the least privileges necessary to perform job responsibilities.
   b) Applications processing credit card transactions are configured so that only a System Administrator can add users to the system.
   c) Only individuals authorized by the unit manager are added to the system by the System Administrator.
   d) Each authorized user has a unique account and password, and does not share their account and password with anyone.
   e) In instances where a single administrative account must be shared amongst authorized application admins (e.g. some sort of limitation of the application itself), a second unique form of authentication (identification) must be used (e.g. Secure token) in order to gain access to the application.
   f) Access to and querying of the cardholder database is restricted to the database administrator.
   g) Access to systems with cardholder data is revoked immediately if a user is terminated.
   h) Cardholder data may not be saved, copied, or moved onto local hard drives or removable electronic media.

4) Methods Approved for Acceptance of Credit or Debit Cards
   a) Credit or debit card payments may be accepted using only the following approved methods:
      i) Card Present
         (1) Credit card dipped or swiped through an Approved Terminal or Device
   b) Card Not Present
      i) Cardholder data communicated verbally over the phone
      ii) Cardholder data received in writing on a secure analog fax or by US Mail
      iii) Cardholder data entered into a third party PCI-DSS-compliant payment application approved by the Information Security Office
iv) Cardholder data entered into a Princeton University website with a secure PCI compliant gateway approved by the Information Security Office

c) Transmission of cardholder data via end user messaging, including E-mail, instant message, or chat is strictly prohibited.

5) Methods Approved for Processing of Credit or Debit Card Transactions

a) Computers / Terminals
   i) Only centrally managed University owned “DeSC Standard” computers, approved terminals and Devices, and servers in the PCI Computing Environment, can be used to process credit or debit card transactions. Any exceptions must be approved by Information Security Office.
   ii) Computer/terminals used to process credit or debit card transactions must be labeled as a machine used to process credit cards, with owner’s name and contact information.
   iii) A complete list of computers/terminals used to process credit or debit card transactions must be provided to Cash and Investment Services by each Merchant Location annually. The list must include the make, model, serial number, and location of each machine.

b) When using a terminal to process credit or debit card receipts.
   i) EMV Chip Cards must be dipped into an approved terminal or device.
   ii) Non-EMV Chip Cards may be swiped through an approved terminal or device. If terminal cannot read the magnetic stripe, the card number may be keyed into the terminal.
   iii) Terminals must be set to automatically settle daily.
   iv) Point-of-sale devices must be configured to print only the last four characters of the credit or debit card number on both customer and merchant receipts, and on any reports that may be produced by the device.

c) The following wireless and mobile devices are currently not approved for the acceptance and processing of credit or debit card transactions.
   i) Card readers (e.g. Square and other devices) that connect to mobile phones, tablets, or other wireless devices.
   ii) Wireless keyboards

6) E-Commerce

a) University websites that accept online payment by credit or debit card and redirect users to a secure payment gateway must be reviewed and approved by Finance Technology and OIT, and the web server must be located in a secure environment approved by OIT, located outside of the University’s PCI Compliant Computing environment. Secure gateways are only permitted if they have been approved by Finance Technology.

b) Appropriate software development practices need to be followed for the creation and maintenance of any web site or applications that store, process, or transmit cardholder data or that can impact the security of the Cardholder Data Environment. Prior to development, the department should contact Finance Technology for a list of current practices and/or to discuss options.

7) Third party applications software that accepts payment by credit card must be approved by Finance Technology. Prior to implementation the Department must conduct required due diligence on the software application in conjunction with Finance Technology, to ensure that the application is properly configured, and to determine how cardholder data is captured, transmitted and stored by the application.

a) Third party software applications should be configured to utilize a secure gateway and must be reviewed and approved by Finance Technology.

b) Service Providers must contractually assume responsibility for the security of cardholder data they handle on behalf of the University, and Service Provider contracts must be reviewed and approved by Finance Technology for PCI language and confidentiality provisions. All Service Provider contracts, and contract renewals executed by a department must be submitted to Finance Technology.

c) Each year the Department must verify with Finance Technology that any third party software applications used by the Department to process cardholder data are PA-DSS compliant, and any third party Service Provider used by the Department to process cardholder data have been certified by VISA/MC as a compliant service provider.
d) Except on computers/terminals/registers used only for cashing at a point of sale, the Application must be configured to meet all PCI requirements for User IDs and passwords which are not satisfied by the University's general network:
   i) Disable inactive user accounts within 90 days.
   ii) Require users to change their passwords at least every 90 days and submit a new password that is different from any of the last four passwords he or she has used
   iii) Lock out user ID’s after no more than six failed attempts, with lockout duration set to a minimum of 30 minutes or until an administrator enables the User ID
   iv) Require strong passwords with minimum length of at least 7 characters that contain both numeric and alphabetic characters
   v) Verify user identity before permitting modification to any authentication credential, such as a password reset or provisioning of new token
   vi) Require users to re-authenticate or re-activate the session after being idle for more than 15 minutes.
   vii) Login via remote access to applications handling cardholder data requires use of a secure token and a password

8) If an application requires storage of cardholder data on the University network, a Merchant Location must utilize Princeton University’s PCI Computing Environment to process credit or debit card transactions.
   a) Use of the Princeton University’s PCI Computing Environment is permitted only when a third party solution is not available, and requires written approval by the Information Security Office and Finance Technology.

9) Segregation of Duties
   a) In order to minimize manual errors and ensure compliance with PCI requirements, the segregation of credit and debit card handling duties is required.
   b) The processing of credit or debit card transactions, refunds, and monthly reconciliation must be performed by two or more individuals.
   c) In departments where the segregation of duties is not feasible, alternative and compensating controls may be implemented to achieve the desired objectives. Please contact Cash and Investment Services on how to establish appropriate controls for your area.
   d) The department manager is responsible for ensuring that Cash and Investment Services is aware of any changes in personnel or job descriptions that impact the segregation of duties.

10) Reconciliation of Processed Credit or Debit Card Receipts
    a) Credit or debit card settlements from terminal receipts or web-based reports should be reconciled against the ledger detail report and merchant account statements. Reconciliations must be maintained by the department and are subject to review by Cash and Investment Services.
    b) Reconciliations must be performed at least monthly and must be signed and dated. Daily reconciliations are strongly recommended.