



PCI FRIDAY

NEWSLETTER

PCI DSS BEYOND THE AUDIT

WHAT WE'VE LEARNED SO FAR FROM PCI FRIDAY

Six practical lessons on scope, segmentation, governance, assurance, and sustainable PCI DSS compliance.



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1



Protecting Trust

2



Segmentation

3



Costly Mistakes

4



Myths vs Reality

5



PCI DSS Scope

6



Requirement 12



CREST
Accredited



PCI QSA
Qualified Security
Assessor



ISO/IEC 27001
Certified



UAE DESC
Accredited

Strong security builds **confidence**. Continuous assurance earns **trust**.

What PCI Friday Has Covered So Far

When we started **PCI Friday**, we did not want to create another series that simply walks through PCI DSS one requirement at a time. The standard already tells organizations what is expected. The harder part is making it work in a real environment: understanding scope, keeping ownership clear, collecting evidence, managing change, and ensuring controls continue to operate long after the assessment ends. Our first six PCI Friday editions explored those practical challenges from different angles. This volume brings the lessons together in one place.



Inside this volume

1. It Is Not About Passing the Audit. It Is About Protecting Trust.
2. Effective Segmentation Reduces PCI DSS Scope
3. Five PCI DSS Mistakes That Cost Organizations Millions
4. PCI DSS: Myths vs Reality
5. What Expands Your PCI DSS Scope?
6. Requirement 12: The Foundation of Every Successful PCI DSS Programme

LESSON 01

✓ PCI FRIDAY

It's Not About Passing the Audit. It's About Protecting Trust.

PCI DSS is more than a compliance checkbox. It is a proven framework to safeguard payment card data, strengthen security controls and build customer confidence in an increasingly digital world.



PROTECT CARDHOLDER DATA

Know where it is. Control how it is accessed. Encrypt it everywhere it travels.



SECURE SYSTEMS & ACCESS

Strengthen authentication, privilege access and network segmentation.



DETECT & REMEDIATE

Identify vulnerabilities early. Patch proactively. Reduce risk continuously.



MAINTAIN COMPLIANCE YEAR-ROUND

Build a sustainable PCI programme with governance, testing and continuous assurance.



Strong security builds confidence. Continuous assurance earns trust. **That's the real value of PCI DSS.**



ASSESS



STRENGTHEN



VALIDATE



ASSURE

An assessment matters, but it should never become the sole purpose of a PCI DSS programme.

The real objective is protecting payment data every day. That means knowing where account data goes, limiting access, securing the systems around it, finding weaknesses early, and making sure the controls still work when nobody is preparing for an audit. The assessment should confirm that an effective security programme is already operating. It should not be the event that temporarily creates one.

The lesson: Compliance is a milestone. Protecting payment data and maintaining trust is the continuing responsibility.

From the QSA's Notebook

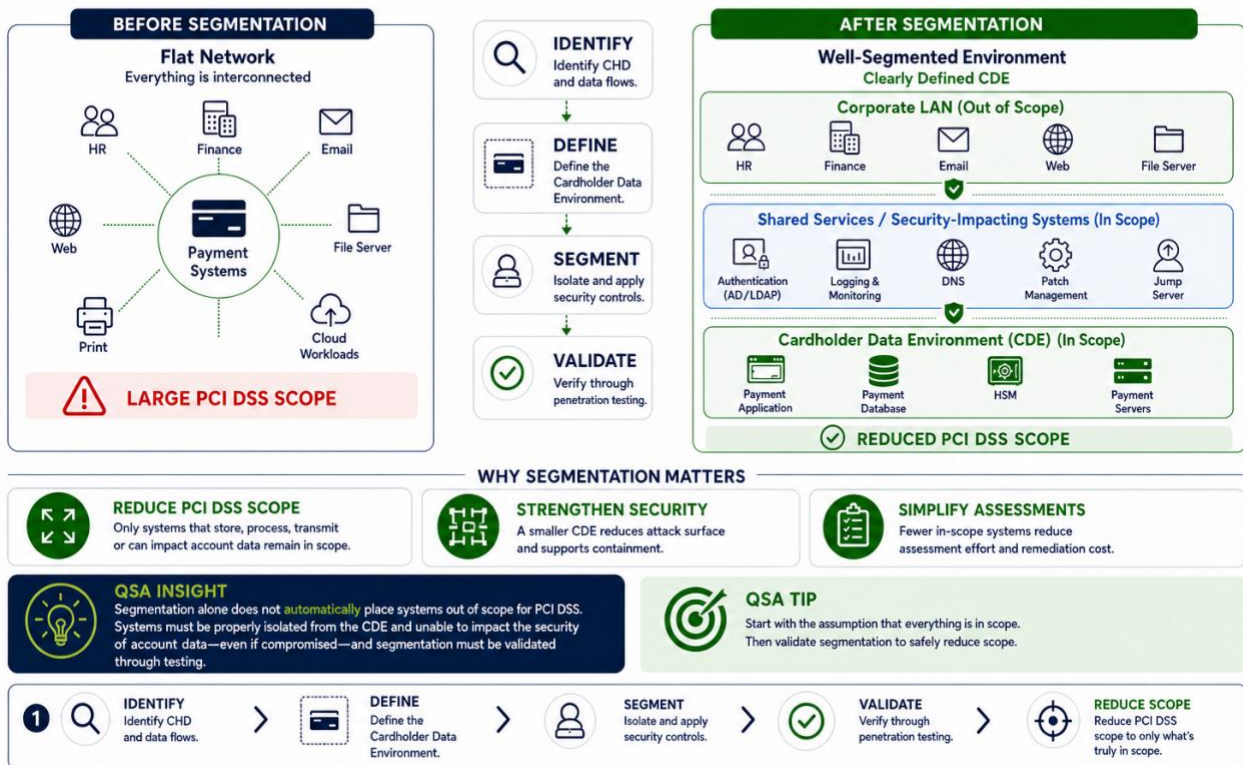
The healthiest PCI DSS programmes do not suddenly become busy when the assessor arrives. Their normal operations already produce the control evidence the assessment needs.

LESSON 02



Effective Segmentation Reduces PCI DSS Scope.

A smaller, well-defined Cardholder Data Environment (CDE) can simplify assessments, reduce costs and improve security.



Segmentation is often discussed as an easy way to reduce scope: place the Cardholder Data Environment on a separate network and keep everything else outside it.

In practice, it is rarely that simple.

Shared authentication, logging, administrative access, monitoring, patching, DNS, remote support, and other connected or security-impacting services can affect the CDE even when they do not store cardholder data themselves.

A separate VLAN or a line on a network diagram does not prove isolation. If segmentation is being used to reduce scope, it must be properly designed, maintained, and validated as effective.

The lesson: Do not assume segmentation reduces scope. Be ready to demonstrate that it does.

From the QSA's Notebook

Good segmentation can reduce risk and assessment effort. Weak segmentation creates false confidence—and may leave far more of the environment in scope than expected.

LESSON 03

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5 PCI DSS MISTAKES

THAT COST ORGANIZATIONS MILLIONS

The most expensive PCI DSS findings are often the most preventable.

1 POOR PCI DSS SCOPING

RISK: Unnecessary systems remain in scope, increasing cost, effort and risk.

BETTER PRACTICE: Map payment-data flows, maintain the CDE inventory and validate scope annually and after significant change.

2 WEAK NETWORK SEGMENTATION

RISK: Flat networks expose additional systems and increase possible attack paths.

BETTER PRACTICE: Implement effective segmentation and validate that controls work as intended.

3 INADEQUATE ACCESS CONTROLS

RISK: Shared accounts, weak MFA and excessive privileges increase the risk of unauthorized access.

BETTER PRACTICE: Use unique identities, least privilege, MFA and periodic access reviews.

4 DELAYED PATCHING

RISK: Known vulnerabilities remain available to attackers.

BETTER PRACTICE: Apply risk-based patching, scan regularly and track remediation to closure.

5 COMPLIANCE ONLY BEFORE THE AUDIT

RISK: Controls degrade, evidence is missing and compliance becomes reactive.

BETTER PRACTICE: Embed PCI DSS into normal operations through ongoing monitoring, testing and improvement.

REAL-WORLD LESSON

Well-known breaches repeatedly demonstrate the cost of weak third-party access, ineffective segmentation, delayed patching and inadequate monitoring. Control failures become business failures.

QSA INSIGHT

The majority of PCI DSS findings are not caused by missing technology. They result from weak governance, poor scoping and inconsistent operational processes.

COMPLIANCE IS AN OUTCOME OF GOOD SECURITY

PCI DSS sets the foundation. Security is the foundation reinforced every day through people, processes and technology.

Scoping, segmentation, access governance, patching and continuous control operation are business-risk decisions—not audit tasks.

Some PCI DSS problems are expensive because they create both security exposure and unnecessary operational effort.

1. **Poor scoping** — bringing unnecessary systems into the PCI DSS environment, or overlooking systems that can affect it.
2. **Weak segmentation** — increasing the number of systems exposed to the CDE and widening possible attack paths.
3. **Inadequate access controls** — allowing shared accounts, excessive privileges, weak authentication, or poorly governed administrative access.
4. **Delayed patching** — leaving known vulnerabilities available to attackers while remediation waits for the next assessment cycle.
5. **Preparing only for the audit** — allowing controls and evidence to deteriorate during the rest of the year.

These are not isolated compliance problems. They influence the cost of the programme, the size of the attack surface, and the organization's ability to respond when something goes wrong.

The lesson: The most expensive PCI DSS failures often begin with weak fundamentals, not obscure technical issues.

LESSON 04



PCI DSS: MYTHS vs REALITY

Common misconceptions that can impact your PCI DSS compliance programme.

MYTH	REALITY
ISO/IEC 27001 certification automatically means PCI DSS compliance.	ISO/IEC 27001 and PCI DSS are complementary frameworks, but PCI DSS includes payment-specific security requirements that must be independently assessed.
Outsourcing payment processing removes all PCI DSS responsibilities.	Outsourcing may reduce PCI DSS scope, but organizations remain responsible for managing service providers and protecting payment data within their environment.
A passing ASV scan means you are PCI DSS compliant.	ASV scanning is only one PCI DSS requirement. Compliance also requires controls for access, vulnerability management, logging, monitoring, secure development and incident response.
PCI DSS is only an annual audit.	PCI DSS requires continuous activities throughout the year, including vulnerability scanning, penetration testing, log reviews, patch management and periodic access reviews.
PCI DSS compliance guarantees security.	PCI DSS establishes a strong security baseline. Maintaining security requires continuous monitoring, testing, threat awareness and ongoing improvement.



QSA INSIGHT

Organizations that embed PCI DSS into daily operations achieve stronger security outcomes than those treating it as a one-off compliance exercise.



KEY TAKEAWAYS



- PCI DSS covers people, processes and technology.
- Outsourcing payment services does not eliminate compliance responsibilities.
- ASV scanning is only one component of PCI DSS compliance.
- PCI DSS requires continuous compliance activities.
- Compliance provides a security baseline—not a guarantee of security.



WHY IT MATTERS



- Reduce audit findings.
- Improve security maturity.
- Maintain continuous compliance.
- Better protect cardholder data.
- Prepare for successful PCI DSS assessments.



NOTE: PCI DSS is designed as a continuous security programme—not a point-in-time certification. Recurring requirements must be performed throughout the year.

“We are ISO/IEC 27001 certified, so we are already PCI DSS compliant.”

The two can complement each other, but PCI DSS contains payment-specific requirements that still need to be evaluated.

“We outsourced payments, so PCI DSS is no longer our responsibility.”

Outsourcing can reduce scope, but the organization still needs to understand its remaining responsibilities and manage the service-provider relationship.

“Our ASV scan passed, so we are compliant.”

An ASV scan validates only one part of a much broader PCI DSS programme.

“PCI DSS is an annual audit.”

Many controls and activities must operate throughout the year.

“PCI DSS compliance means we are secure.”

PCI DSS provides an important baseline. It does not replace continuous monitoring, testing, risk management, and improvement.

The lesson: Compliance provides structure and assurance, but it should never create complacency.

LESSON 05

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WHAT EXPANDS YOUR PCI DSS SCOPE?

Understanding the systems that may bring additional assets into your Cardholder Data Environment (CDE) assessment.



QSA INSIGHT

“PCI DSS scope is determined by the presence of the Cardholder Data Environment (CDE), **connected systems**, and the **effectiveness of segmentation**—not simply by where cardholder data is stored.”

SYSTEMS THAT MAY INCREASE PCI DSS SCOPE



CONNECTED SYSTEMS

Systems that connect to or communicate with the CDE.



SHARED AUTHENTICATION SERVICES

Identity services supporting authentication to CDE systems.



ADMINISTRATIVE ACCESS

Jump servers, bastion hosts, VPNs and privileged-access platforms.



MANAGEMENT SYSTEMS

Systems used to manage, configure or monitor CDE components.



NETWORK CONNECTIVITY

Flat or poorly segmented networks can significantly increase scope.



THIRD-PARTY ACCESS

Remote support and vendor access to CDE systems.



WHY IT MATTERS



Better define the CDE



Reduce unnecessary assessment scope



Lower assessment effort and remediation costs



Improve network-segmentation effectiveness



Simplify PCI DSS compliance activities



KEY TAKEAWAYS



Identify all CDE components and connected systems.



Evaluate authentication, administration and management systems.



Validate segmentation where used to reduce scope.



Document every scoping decision with clear rationale and evidence.

Review and validate scope regularly, especially after changes.



EFFECTIVE PCI DSS SCOPING REQUIRES **IDENTIFYING ALL CDE COMPONENTS, CONNECTED-TO SYSTEMS, SECURITY-IMPACTING SYSTEMS, AND VALIDATING SEGMENTATION** WHERE USED TO REDUCE SCOPE.



One of the easiest scoping mistakes is to ask only whether a system stores cardholder data.

PCI DSS scoping also considers systems that connect to the CDE or can affect its security. Depending on the environment, that can include:

- Shared authentication and identity services
- Jump servers, bastion hosts, VPNs, and privileged-access platforms
- Logging, monitoring, and security-management systems
- Connected networks and shared infrastructure
- Administrative workstations
- Third-party support and remote-access paths

This is why the CDE often becomes larger than teams initially expect. The relationships around payment systems matter as much as the obvious systems inside them.

The lesson: Start with payment-data flows and trust relationships—not just a list of systems known to store cardholder data.

From the QSA's Notebook

A system does not need to hold cardholder data to influence PCI DSS scope. The more useful question is: “Could its compromise affect the security of the CDE?”

LESSON 06

PCI FRIDAY

PCI DSS REQUIREMENT 12

THE FOUNDATION OF EVERY SUCCESSFUL PCI DSS PROGRAMME

Requirement 12 establishes the governance framework that enables organizations to implement, manage, and sustain PCI DSS compliance. It defines how security policies, roles, risk management, awareness, and third-party oversight come together to support the protection of payment data.

REQUIREMENT 12 HELPS ORGANIZATIONS ESTABLISH

- Executive Leadership & Accountability
- Information Security Policies
- Acceptable Use Policies (AUP)
- Roles & Responsibilities
- Risk Management
- Security Awareness & Training
- PCI DSS Compliance Management
- Third-Party Service Provider Governance
- Scope Validation & Continuous Review

COMMON CHALLENGES

- No executive ownership
- PCI managed only during audit season
- Incomplete or missing evidence
- Undefined roles and responsibilities
- Poor third-party oversight
- PCI scope not regularly reviewed

BENEFITS OF STRONG GOVERNANCE

- Better audit readiness**
Well-defined processes and evidence lead to smoother assessments.
- Clear accountability**
Everyone knows their role and what is expected of them.
- Continuous compliance**
Governance drives ongoing compliance—not just once a year.
- Improved risk visibility**
Understand and mitigate risks before they become issues.
- Consistent evidence collection**
Maintain organized and complete documentation.
- Stronger third-party oversight**
Reduce supply chain risks and ensure accountability.
- Better executive reporting**
Provide meaningful metrics and compliance status.

QSA INSIGHT

Organizations rarely struggle with PCI DSS because they lack security technologies. More often, challenges arise when governance, ownership, and ongoing programme management are not embedded into daily operations. Requirement 12 provides the framework that turns PCI DSS from an annual assessment into a sustainable security programme.

QSA TIP

Assign a dedicated PCI Program Owner with executive sponsorship and establish clear responsibilities across Security, IT Operations, Development, Infrastructure, Compliance, Procurement, and Business stakeholders. PCI DSS is an organizational responsibility—not solely an IT initiative.

THE PCI DSS CONTINUOUS COMPLIANCE LIFECYCLE

1. Executive Sponsorship

2. Governance & Oversight

3. Policy & Standards

4. Implement Controls

5. Monitor & Assess

6. Evidence Collection

7. Internal Reviews

8. Assessment (ROC/AOC)

9. Continuous Improvement

KEY TAKEAWAY:

Technology protects payment data.
Governance sustains PCI DSS compliance.

PCI DSS Requirement 12 is titled **“Support Information Security with Organizational Policies and Programs.”** It covers the organizational disciplines needed to keep technical controls working, including policies, responsibilities, acceptable-use expectations, risk activities, security awareness, incident response, scope management, and third-party service-provider governance.

Firewalls, encryption, MFA, and logging all matter. But somebody must own them, review them, respond when the environment changes, and retain evidence that they continue to operate.

This is why PCI DSS cannot belong to IT alone. Security, Infrastructure, Cloud, Development, Operations, Risk, Compliance, Procurement, HR, and business teams may all have responsibilities within the programme.

The lesson: Technology enables PCI DSS compliance. Governance is what sustains it.

From the QSA’s Notebook

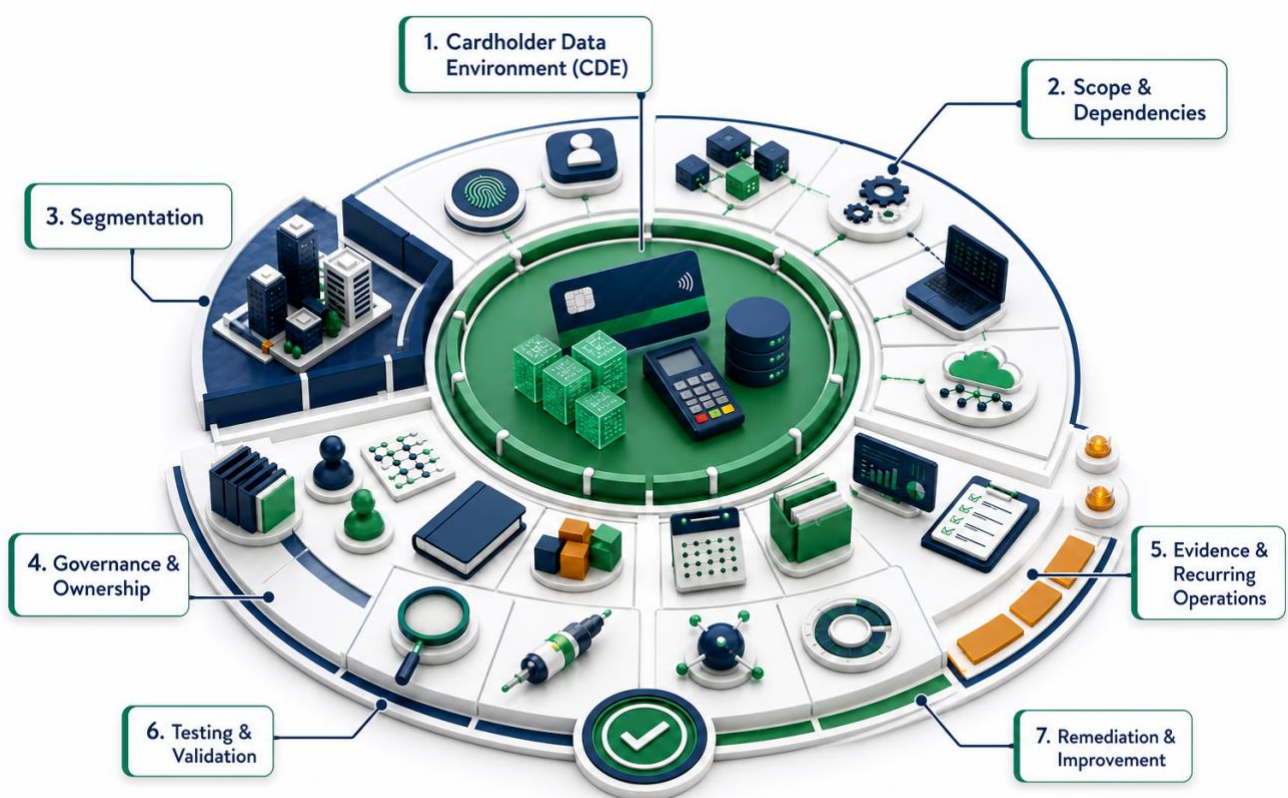
Assign one person to coordinate the PCI DSS programme, but give each control a genuine operational owner. The programme owner should not spend the year chasing responsibilities that were never clearly assigned.

THE COMBINED PERSPECTIVE

What Connects These Lessons?

Although each lesson approaches PCI DSS from a different angle, together they describe the foundations of a sustainable PCI DSS programme.

Protecting payment data begins with understanding where it flows and which people, processes, technologies, connections, and third parties can affect its security. That understanding creates the foundation for accurate PCI DSS scoping and helps organizations distinguish the systems that genuinely belong within the environment from those that can be safely separated.



Effective segmentation can then reduce unnecessary exposure and compliance effort, but only when it is properly designed, maintained, and validated. Assumptions about outsourcing, certifications, network boundaries, or passing security scans cannot replace a clear understanding of how the environment actually operates. The programme also needs governance. Every control should have an accountable owner, recurring activities should operate throughout the year, and evidence should be retained as part of normal business processes. Technical safeguards remain essential, but policies, responsibilities, risk management, awareness, and third-party oversight are what keep those safeguards effective as systems and organizations change.

Finally, organizations need to test their assumptions. Scanning, penetration testing, segmentation validation, access reviews, monitoring, and remediation should demonstrate that controls are not merely documented or configured, but are genuinely reducing risk to the payment environment.

PCI DSS becomes easier to manage when it stops being an annual audit project and becomes part of normal business operations.

PRACTICAL TAKEAWAY

Six Habits of a Sustainable PCI DSS Programme

Looking across the lessons in this volume, six practical habits stand out. Together, they help organizations maintain PCI DSS compliance while strengthening payment security throughout the year.



1. Keep scope alive

PCI DSS scope is not something you define once and forget. New systems, integrations, service providers, network connections, and administrative tools can change the environment. Keep payment-data flows, inventories, dependencies, and CDE boundaries current—and review them whenever something significant changes.

2. Give every control an owner

A control without a clear owner eventually becomes nobody's responsibility. Each recurring PCI DSS activity should have someone accountable for performing it, retaining the evidence, addressing exceptions, and ensuring there is backup coverage when that person is unavailable.

3. Capture evidence as you work

Do not wait for the assessment to start searching through emails, tickets, and shared folders. Access reviews, scans, approvals, training, risk analyses, and remediation activities should produce and retain evidence as part of the normal process.

4. Put change through a PCI lens

A new application, vendor, cloud service, firewall rule, or authentication platform may affect PCI DSS scope or control effectiveness. Ask about the PCI DSS impact before the change goes live—not after it has already altered the environment.

5. Test whether controls work

A documented or configured control is not necessarily an effective control. Scanning, penetration testing, segmentation testing, access reviews, monitoring, and other validation activities should confirm that controls operate as intended and genuinely reduce risk.

6. Remediate, retest, and improve

Finding a weakness is only the beginning. Assign remediation, track it to closure, and retest the fix. When the same issue appears repeatedly, look beyond the individual finding and address the underlying process, ownership, or governance problem.

Sustainable PCI DSS compliance is built through everyday operational habits—not through a once-a-year assessment exercise.

COMPANY PROFILE

About Haumaru Whānau

Haumaru Whānau is a **PCI DSS Qualified Security Assessor (QSA) Company**, helping organizations protect payment data and build sustainable PCI DSS programmes.

Our services include PCI DSS assessments, readiness and advisory support, payment-security assurance, penetration testing, cybersecurity assurance, governance, risk, and compliance. We combine assessor insight with practical technical experience to help organizations move beyond audit preparation and maintain effective security controls throughout the year.

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Securing Trust. Protecting Data. Enabling Growth.

Important Notice

This publication provides general educational and professional guidance. It is not a substitute for the official PCI DSS standard, applicable PCI SSC programme documentation, payment-brand requirements, acquirer instructions, or a formal assessment by an appropriately qualified assessor. Organizations should refer to current PCI SSC documentation when determining their obligations. PCI DSS v4.0.1 is the active version of the standard at the time of publication.

Official References

PCI Security Standards Council, PCI DSS v4.0.1 and supporting documents: www.pcisecuritystandards.org

PCI SSC, Guidance for PCI DSS Scoping and Network Segmentation: www.pcisecuritystandards.org/documents/Guidance-PCI-DSS-Scoping-and-Segmentation_v1_1.pdf