

# Account Data Compromise

Guide for Level 4 customers

Explore now!



## What is an Account Data Compromise event?



An Account Data Compromise (ADC) is an intrusion into computer systems or access to physical cardholder data where unauthorised disclosure, modification, or destruction of cardholder data is suspected.

The key is having a plan in place to respond to the possibility of a data breach to your systems or those of the third parties storing, processing or transmitting cardholder data on your behalf.

Payment Card Industry Data Security Standard (PCI DSS) is designed to reduce, if not eliminate, the risk of compromise. However, security can never be perfect - so it's vital to have your own incident response plan in place, tailored to your own business environment, to be able to effectively manage the ongoing risk of a possible ADC.



## What to do in the case of an ADC?

If you find a compromise - or merely suspect one - you need to take the following steps:



1. Make contact with your customer acquirer, Worldpay, immediately



2. Don't access or alter compromised systems, e.g. logging in or changing your password



3. Instead of turning off compromised systems, unplug any network cables



4. Back up your systems immediately to preserve their current state, which will also help with any investigations at a later stage

The Worldpay team will follow up with any customer who has suffered, or is a suspect of, an Account Data Compromise.



# ADC PCI DSS Forensic Investigation (PFI) Criteria

Once a case is raised, Worldpay and customers must follow strict procedures in managing an ADC event, including engaging a PCI DSS Forensic Investigator to complete a PFI Investigation.

Card schemes manage ADC events differently.

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**Visa Europe**  
There are two types on investigations, depending on the level of customer and the number and type of card transactions processed.

## PFI LITE

Designed to quickly and cost effectively investigate and remediate a small customer potential data compromise event

- A customer with less than 10,000 Visa ecommerce transactions at risk
- A maximum of three electronic devices, e.g. website, server & database
- Process no Virtual Terminal (VT) transactions

## FULL PFI

In depth investigation into a potential data breach event

- Customers processing more than 10,000 transactions
- A merchant processing Virtual Terminal (VT) transactions
- Previously breached merchants failing the PFI Lite process
- Customers processing Point of Sale (POS) transactions subject to an account data compromise event

**Only Visa operate the PFI Lite process, if a customer does not meet the PFI Lite criteria, then they must complete a Full PFI.**

In the case of a FULL PFI all card brands will be notified by Worldpay and the PFI Investigator



# VISA Europe ADC Penalties

Once a case is raised, Worldpay & customers must follow strict procedures in managing an ADC event

## Visa Europe

€3,000 will be charged for each event no matter of compliancy level. Please note that Visa Europe can apply this cost to all acquirers that process payments on behalf of an alerted customer.

### PFI LITE

Customers processing less than 10,000 ecommerce Visa transactions:

- €3,000 case fee
- No further penalties will be applied as long as the PFI Lite process is adhered to

### FULL PFI

Customers processing more than 10,000 Visa ecommerce transactions, or suffered a breach on their MOTO or Point of Sale payment channels

- €3 per card deemed at risk (PAN Data only)
- €18 per card deemed at risk (PAN with CVV/2 data) or (on POS attacks PAN with Track 1 & 2 data)
- €3,000 case fee

Worldpay can help maximise reductions on penalties, see how?



## How Worldpay can maximise reductions on penalties from Visa

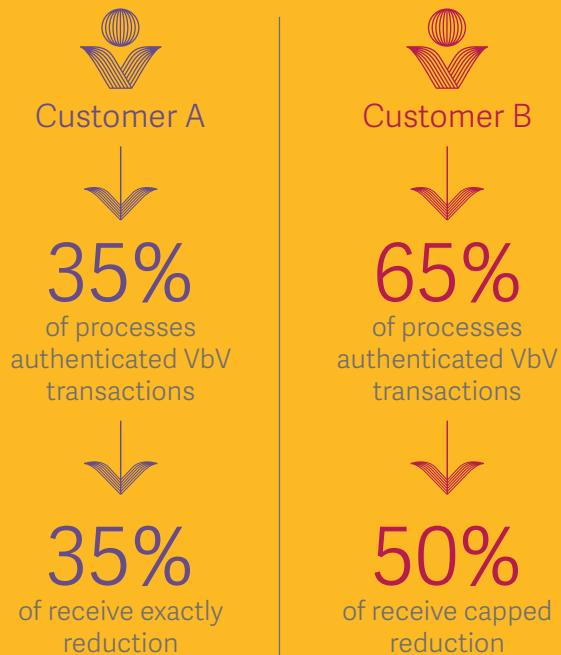


Reductions of between 25%-100% of penalties payable by customers, may be applied based on a self notification of a breach and a PCI DSS compliance status of the entity.

To maximise reductions it is imperative that should you discover or merely suspect a data breach you contact Worldpay immediately.

All reductions are at the discretion of Visa Europe, these reductions if applied are on a case by case basis.

A verified by Visa (VbV) customer that incurs an ADC event and is subject to a financial penalty based on the number of accounts at risk, may have the penalty reduced up to a maximum of 50%



## Mastercard Potential ADC Penalties



Mastercard penalties for ADC events are known as Operational Reimbursement (OR) and Fraud Reimbursement (FR)

Mastercard will levy penalties known as Operational Reimbursement and Fraud Reimbursement when 30,000 Mastercard accounts have been impacted. Their penalty structure is extremely complex and is dependent on which Issuer has opted in to the reimbursement schemes.

As soon as a calculation is provided, Worldpay will contact a customer immediately to discuss the penalty.



## ADC Event: Example of penalties

Visa Europe		
Pan & CVV 4,000 x€18	(€72,000)	£61,512
Compliance reductions 25%	-(€18,000)	-£15,378
	(€54,000)	£46,134
VBV Reduction	-(€27,000)	£23,067
	(€27,000)	£23,067
ADC Case Fee	(€3,000)	£2,563
Sub Total	(€30,000)	£25,630
Mastercard	(\$0)	£0
	Grand Total	£25,630*

In this example an ADC event occurred involving a non compliant customer where 4,000 Visa cards were deemed at risk and less than 30,000 Mastercard cards were deemed at risk. For the purposes of this example PAN & CVV were located.

Any penalty figures are correct at the time and date of release and are subject to change and will be levied on a case by case basis.





# The potential further costs

A rough guide to the associated costs of a suspected ADC event

- Cost of migration to an outsourced solution
  - unknown / hidden costs
- Cost of website re-development
  - unknown / hidden costs
- Cost of compressing existing compliance program into 90 days
  - unknown / hidden costs
- Cost of reputational risk
  - unknown
- QSA engagement for full report on compliance (level 1 certification)
  - approx. £9,000 excl. VAT & Expenses

\_\_\_\_\_ Total £9,000\* + hidden costs

Penalties on previous slide £25,630 +  
£9,000 = £34,630 + Unknown costs

\* Dependent on exchange rate and complexity of company systems

## Where Worldpay supports you

- We support every element of this process for your benefit
- We help you in engaging third parties and provide impartial advice and guidance on remediation with the goal of ensuring this process costs you no more than that is absolutely required
- You benefit in being affiliated to one of the world's largest acquirers, this helps us to help you

[Contact us now!](#)



# The potential further costs

A rough guide to the associated costs of a suspected ADC event



Once you are certified with the SaferPayments programme, if we are fined by the Card Schemes because you experience a data breach, we will waive our right to pass the first £35,000 / €43,000 of fines on to you. To qualify for this waiver, you must meet the conditions below.

- Have answered the online questionnaire honestly and in good faith when self-certifying compliance
- Within 7 working days of discovery of the data compromise advise us in writing of any failure of security within your business or your card acceptance systems
- Retain records, logs and electronic evidence relating to a data compromise and make this available promptly upon request by Worldpay or the Card Schemes
- Co-operate with Worldpay and the involved payment networks in all investigations relating to any data compromise, including a forensic investigation.





## Contact our Payment Data Security Team



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