

Beyond PCI – A Cost Effective Approach to Data Protection

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Ulf Mattsson



- 20 years with IBM Software Development
 - Received US Green Card 'EB 11 Individual of Extraordinary Ability' endorsed by IBM Research
- Inventor of 21 Patents
 - Encryption Key Management, Policy Driven Data Encryption, Distributed Tokenization and Intrusion Prevention
- Research member of the International Federation for Information Processing (IFIP) WG 11.3 Data and Application Security
- Created the Architecture of the Protegrity Database Security Technology
- Received Industry's 2008 Most Valuable Performers (MVP) award together with technology leaders from IBM, Google, Cisco, Ingres and other leading companies







Ulf Mattsson, CTO, Protegrity Corporation

June 4, 2009



How to Evaluate Encryption Technologies

Achieving PCI Compliance & Protecting Cardholder Data





Agenda



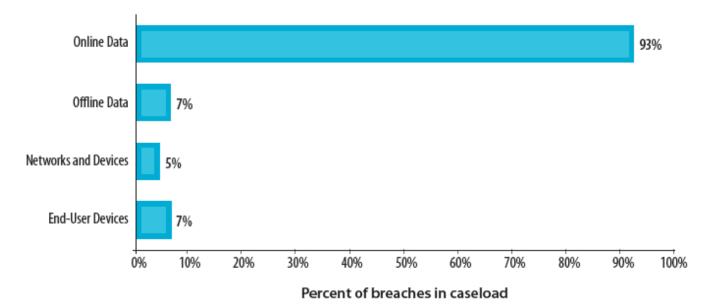
- Review trends in data security threats
- Present case studies protecting PCI and PII data
- Position different data security options
- Discuss how to protect the entire data flow
- Present a risk adjusted approach to data security
- Discuss data security in cloud and test environments

Online Data Under Attack – Not Laptops or Backup



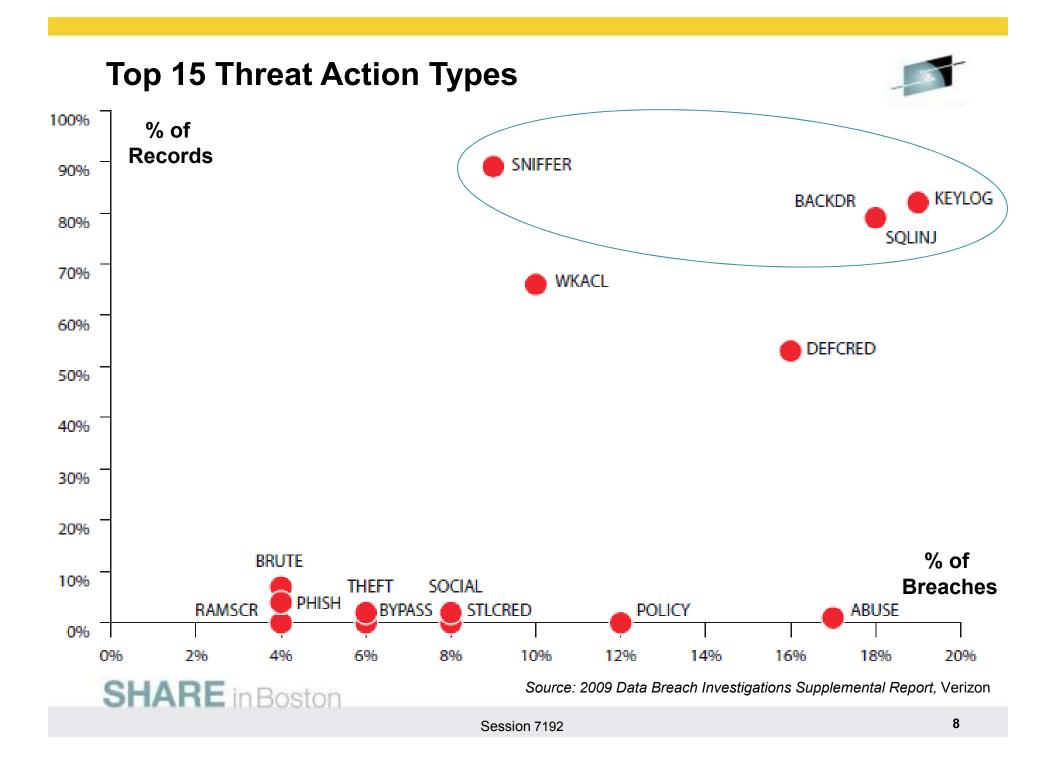
Breaches attributed to insiders are much larger than those caused by outsiders

The type of asset compromised most frequently is online data:



Slide source: Verizon Business 2008 Data Breach Investigations Report





The Gartner 2010 CyberThreat Landscape

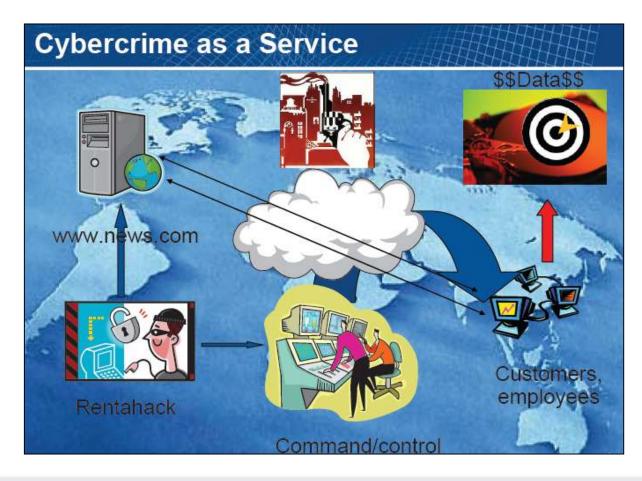


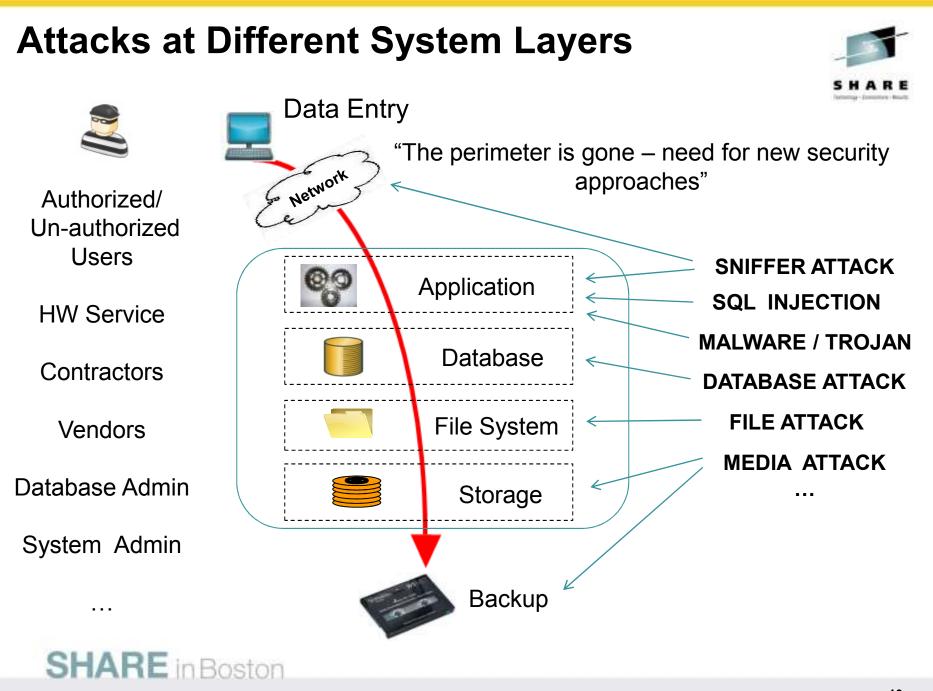
The danger of advanced persistent threats (APTs) to enterprises.

- We have met the threat and they are us.
 - New processes
 - New technologies
 - Complacency
- You need very different armor to survive a sniper's rifle shot than you do for a hailstorm.

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 Threats will always change faster than user behavior





PCI DSS - Payment Card Industry Data Security Standard



- Applies to all organizations that hold, process, or exchange cardholder information
- A worldwide information security standard defined by the Payment Card Industry Security Standards Council (formed in 2004)
- Began as five different programs:
 - Visa Card Information Security Program, MasterCard Site Data Protection, American Express Data Security Operating Policy, Discover Information and Compliance, and the JCB Data Security Program.
- 12 requirements for compliance, organized into six logically related groups, which are called "control objectives."



PCI DSS # 3, 6, 7, 10 & 12



		3 8 8 8
Build and maintain a secure network.	1.	Install and maintain a firewall configuration to protect data
	2.	Do not use vendor-supplied defaults for system passwords and other security parameters
Protect cardholder data.	3.	Protect stored data
		Encrypt transmission of cardholder data and sensitive information across public networks
Maintain a vulnerability management program.	5.	Use and regularly update anti-virus software
	6.	Develop and maintain secure systems and applications
Implement strong access control	7.	Restrict access to data by business need-to-know
measures.	8.	Assign a unique ID to each person with computer access
	9.	Restrict physical access to cardholder data
Regularly monitor and test networks.	10.	Track and monitor all access to network resources and cardholder data
	11.	Regularly test security systems and processes
Maintain an information security policy.	12.	Maintain a policy that addresses information security

PCI DSS #3 & 4 – Protect Cardholder Data

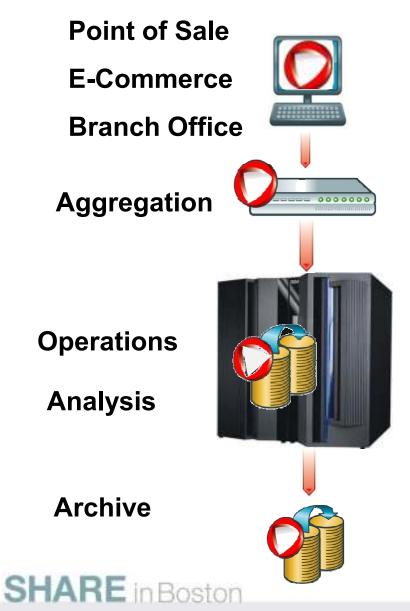


- 3.4 Render PAN, at minimum, unreadable anywhere it is stored by using any of the following approaches:
 - One-way hashes based on strong cryptography
 - Truncation
 - Index tokens and pads (pads must be securely stored)
 - Strong cryptography with associated key-management processes and procedures
- 4.1 Use strong cryptography to safeguard sensitive cardholder data during transmission over open, public networks.
- Comments Cost effective compliance
 - Encrypted PAN is always "in PCI scope"
 - Tokens can be "out of PCI scope"



Case Studies – Retail Environments





'Information in the wild'

- •Short lifecycle / High risk
- •Databases often found at collection points

Temporary information

- •Short lifecycle / High risk
- •Use the transition to re-key the locks

Operating information

Typically 1 or more year lifecycle
Broad and diverse computing and database environment

Decision making information

- •Typically multi-year lifecycle
- •High volume database analysis
- •Wide internal audience with privileges

Archive

- •Typically multi-year lifecycle
- •Preserving the ability to retrieve the data in the future is important



Case Studies – PCI DSS Compliance



Case study #1: US Retailer

- Transparent to exiting applications
- Protect the flow of sensitive credit card information
 - From thousands of stores, Back office systems and Data warehouse
- Central key management
- Ensuring performance on the mainframe

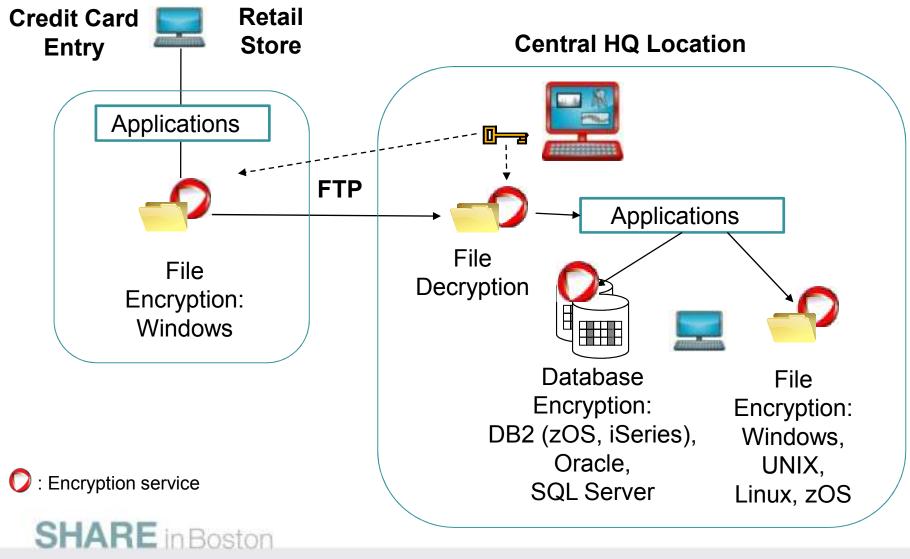
Case study #2: US Retailer

- Protection against advanced attacks
- Protect the flow of sensitive credit card information
 - From thousands of stores, Back office systems and Data warehouse
- Central key management



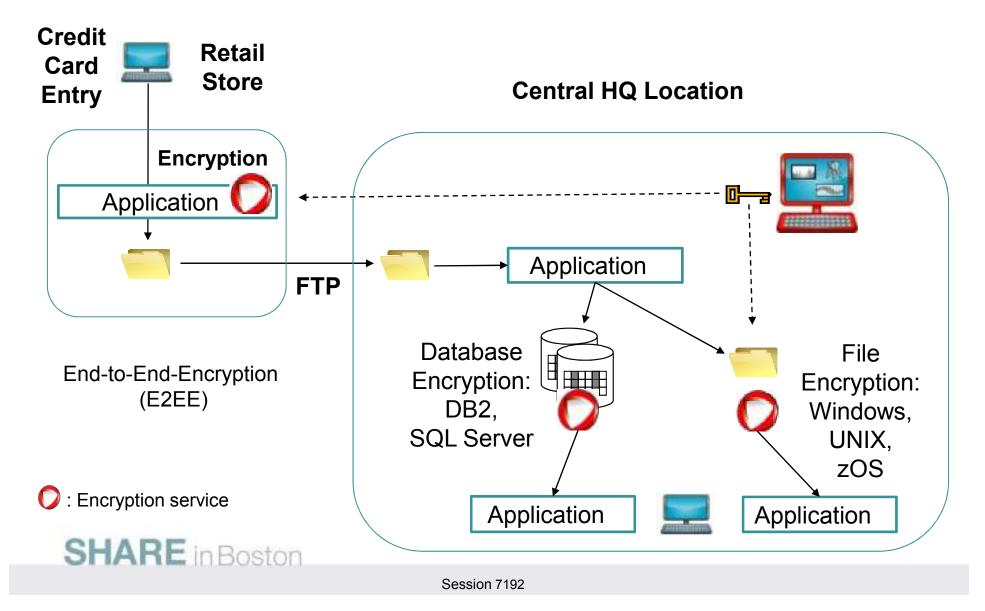
Case Study 1: Goal – PCI Compliance & Application Transparency

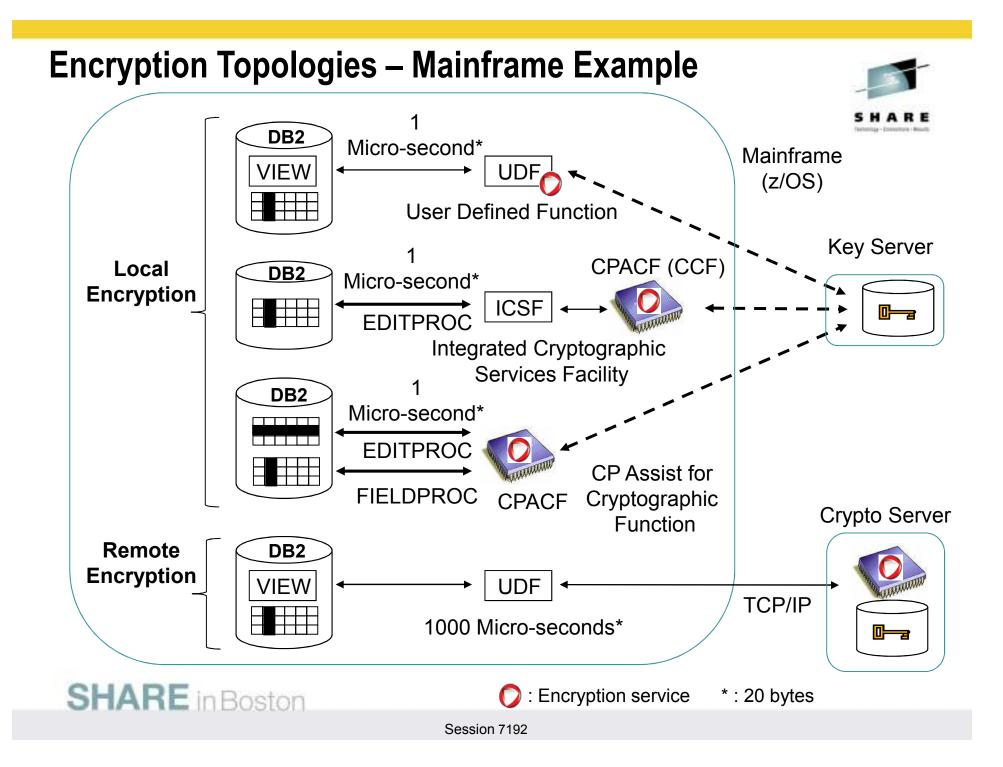




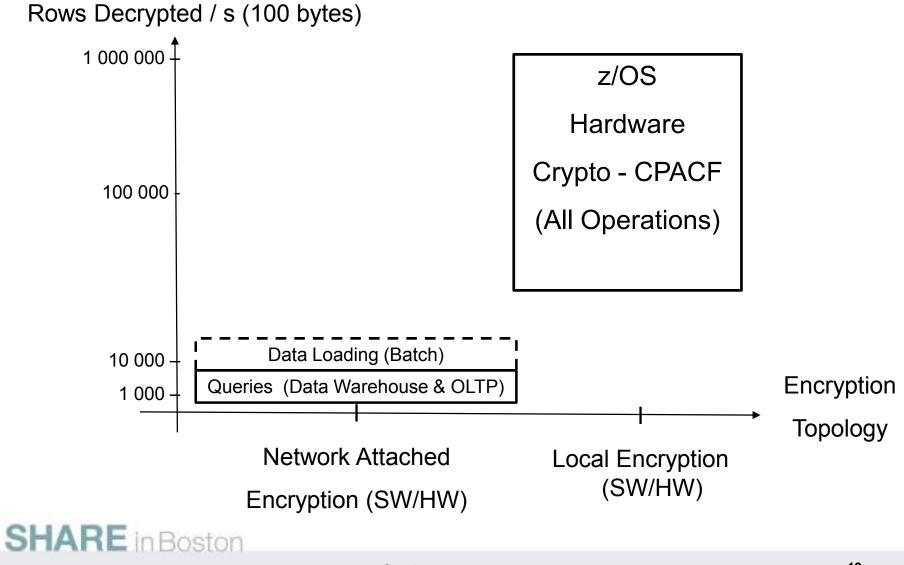
Case Study 2: Goal – Addressing Advanced Attacks & PCI DSS







Column Encryption Performance - Different Topologies



Evaluation of Encryption Options for DB2 on z/OS



Encryption Interface	Performance	PCI DSS	Security	Transparency
API				\bigcirc
UDF DB2 V8			\bigcirc	
UDF DB2 V9 -				G
Fieldproc				G
Editproc				

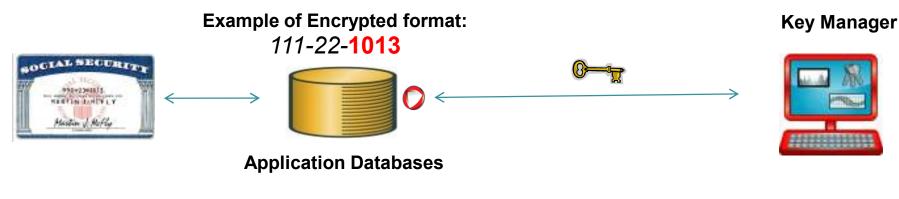
Best • • • • • • • Worst



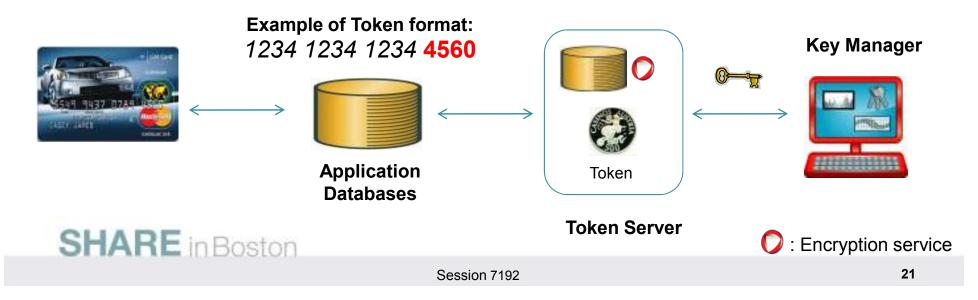
Choose Your Defenses – Newer Data Security Approaches



Format Controlling Encryption



Data Tokenization



What Is Formatted Encryption?



- Where did it come from?
 - Before 2000 Different approaches, some are based on block ciphers (AES, 3DES …)
 - Before 2005 Used to protect data in transit within enterprises
- What exactly is it?
 - Secret key encryption algorithm operating in a new mode
 - Cipher text output can be restricted to same as input code page – some only supports numeric data
 - The new modes are not approved by NIST



Formatted Encryption - Considerations



- Unproven level of security makes significant alterations to the standard AES algorithm
- Encryption overhead significant CPU consumption is required to execute the cipher
- Key management is not able to attach a key ID, making key rotation more complex - SSN
- Some implementations only support certain data (based on data size, type, etc.)
- Support for "big iron" systems is not portable across encodings (ASCII, EBCDIC)
- Transparency some applications need full clear text



What Is Data Tokenization?



- Where did it come from?
 - Found in Vatican archives dating from the 1300s
 - In 1988 IBM introduced the Application System/400 with shadow files to preserve data length
 - In 2005 vendors introduced tokenization of account numbers
- What exactly is it?
 - It IS NOT an encryption algorithm or logarithm.
 - It generates a random replacement value which can be used to retrieve the actual data later (via a lookup)
 - Still requires strong encryption to protect the lookup table(s)



Central Tokenization - Considerations

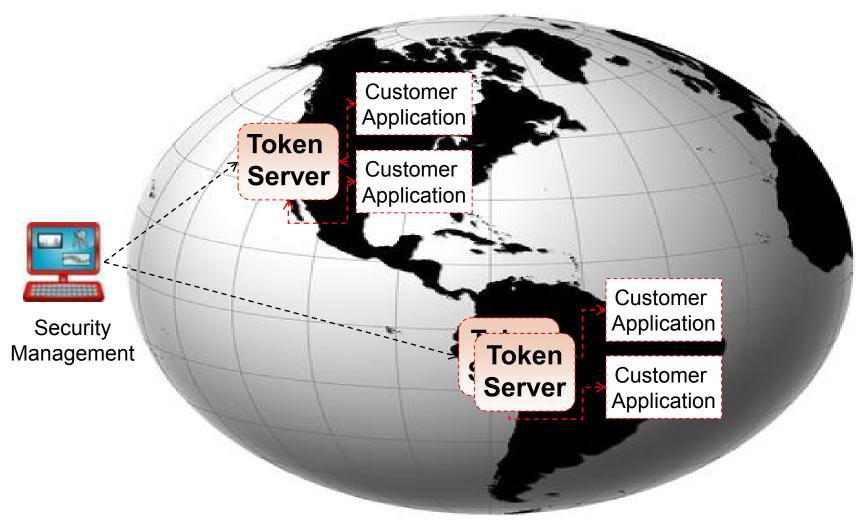


- Transparency not transparent to downstream systems that require the original data
- Performance & availability
 - Imposes significant overhead from the initial tokenization operation and from subsequent lookups
 - Imposes significant overhead if token server is remote or outsourced
- Security
 - Vulnerabilities of the tokens themselves randomness and possibility of collisions
 - Vulnerabilities typical in in-house developed systems exposing patterns and attack surfaces



New Tokenization Approach - Distributed Servers

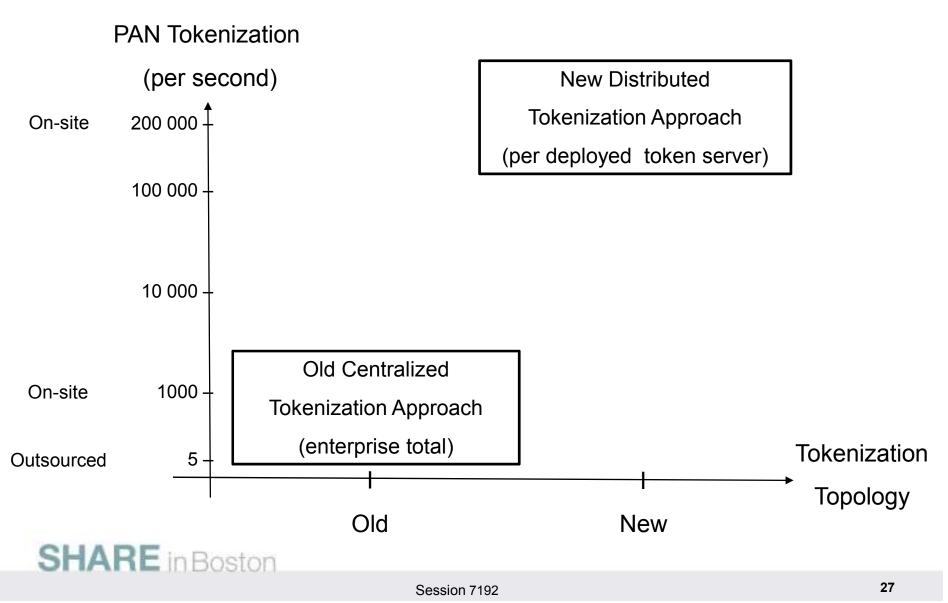






Different Tokenization Approaches -Performance

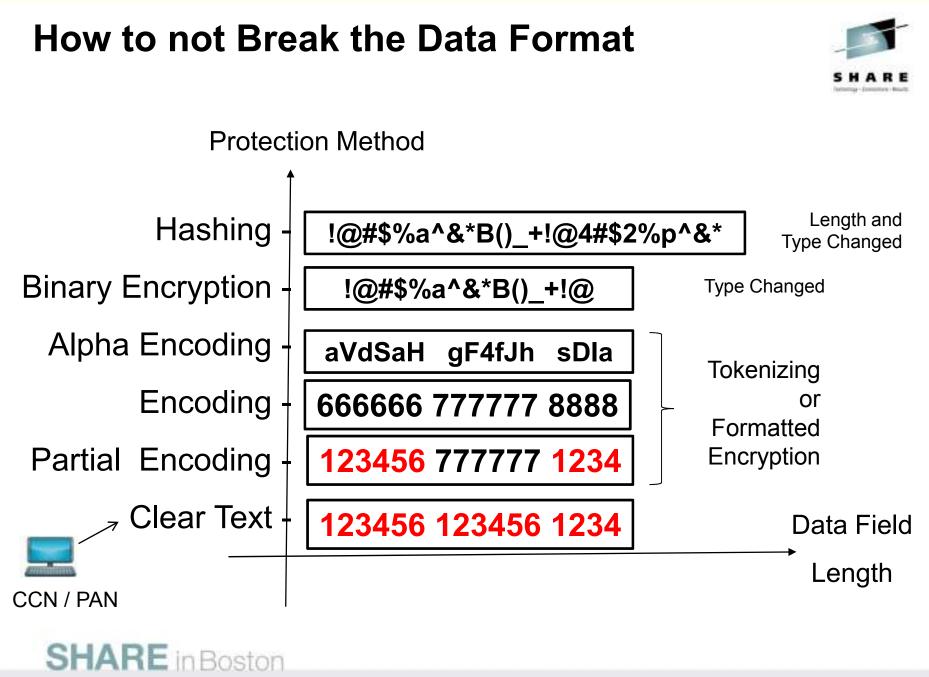




Evaluating Different Tokenization Solutions



Eva	luation Area	Hosted/O	losted/Outsourced On-site/On-premises		On-site/On-premises	
Area	Criteria	Central (old)	Distributed	Central (old)	Distributed	Integrated
Oporati	Availability	\bigcirc		$\overline{}$		
Operati onal	Scalability	\bigcirc		$\overline{}$		
Needs	Performance	\bigcirc		$\overline{}$		
Pricing	Per Server	\bigcirc	\bigcirc			
Model	Per Transaction			\bigcirc	\bigcirc	\bigcirc
Data	Identifiable - PII			$\overline{}$		
Types	Cardholder - PCI					
Security	Separation				$\overline{}$	
occurry	Compliance Scope			6		G
SH	Best • • • • Worst					



Different Security Options for Data Fields



Evaluation Criteria	Strong Encryption	Formatted Encryption	New Distributed Tokenization	Old Central Tokenization
Disconnected environments				\bigcirc
Distributed environments				
Performance impact – data loading				
Transparent to applications		$\overline{}$	$\overline{}$	$\overline{}$
Expanded storage size	$\overline{}$		G	
Transparent to database schema	$\overline{}$			
Long life-cycle data				
Unix or Windows & "big iron"				
Re-keying of data in a data flow	$\overline{}$			
High risk data		\bigcirc		
Compliance to PCI, NIST		\bigcirc		

Best • • • • • • Worst

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Matching Data Protection Solutions with Risk Level



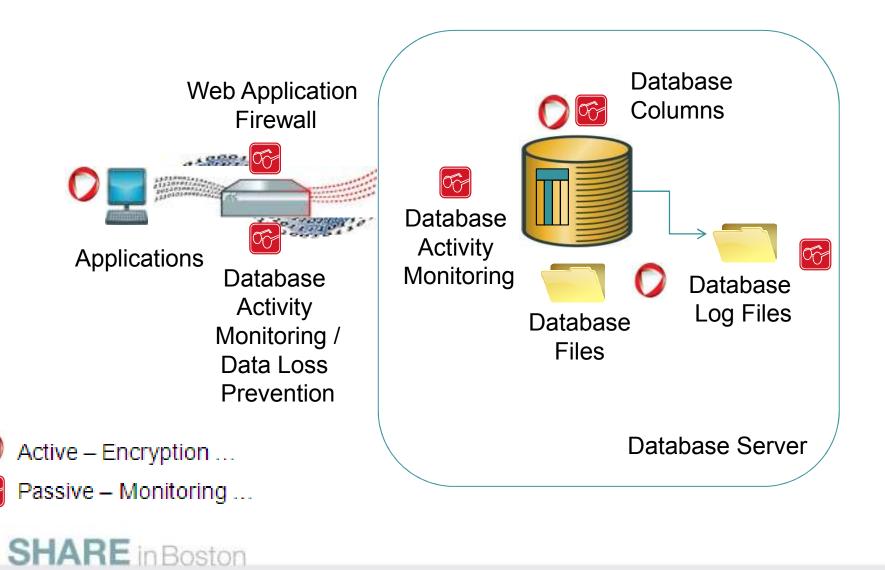
Data Field	Risk Level
Credit Card Number	25
Social Security Number	20
CVV	20
Customer Name	12
Secret Formula	10
Employee Name	9
Employee Health Record	6
Zip Code	3

Risk Level	Solution
Low Risk (1-5)	Monitor
At Risk (6-15)	Monitor, mask, access control limits, format control encryption
High Risk (16-25)	Tokenization, strong encryption



Choose Your Defenses – A Balanced Approach





Cost Effective Technology for PCI DSS

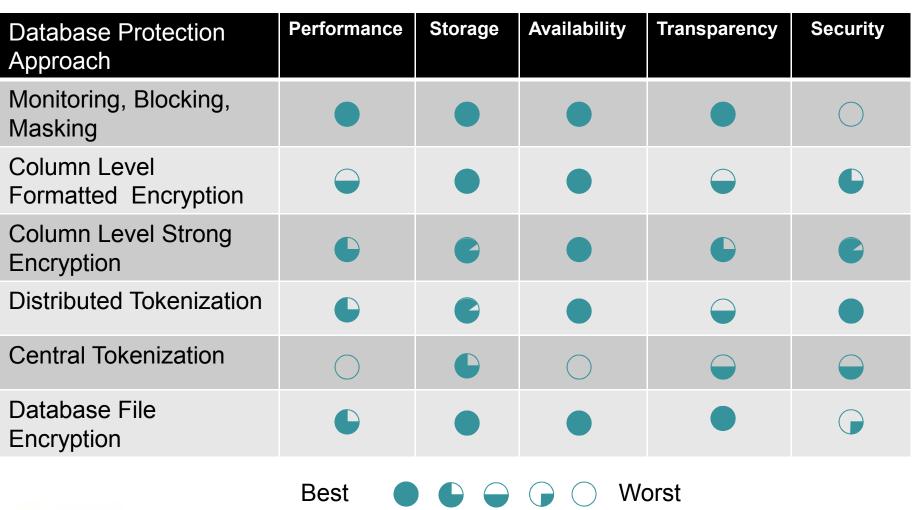


Technologies in ascending order by average cost effectiveness rating	SHARE Pct%*
Firewalls	82%
Anti-virus & anti-malware solutions	74%
	the second s
Encryption for data at rest Encryption for data in motion	71%
Access governance systems	64%
Identity & access management systems	63%
Web application firewalls (WAF)	55%
Correlation or event management systems	55%
Endpoint encryption solution	46%
Data loss prevention systems	43%
Code review	36%
Traffic intelligence systems	32%
Virtual privacy network (VPN)	26%
Intrusion detection or prevention systems	22%
Database scanning and monitoring	18%
ID & credentialing system	11%
Website sniffer or crawlers	7%
Perimeter or location surveillance systems	3%
Average	43%

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Source: 2009 PCI DSS Compliance Survey, Ponemon Institute

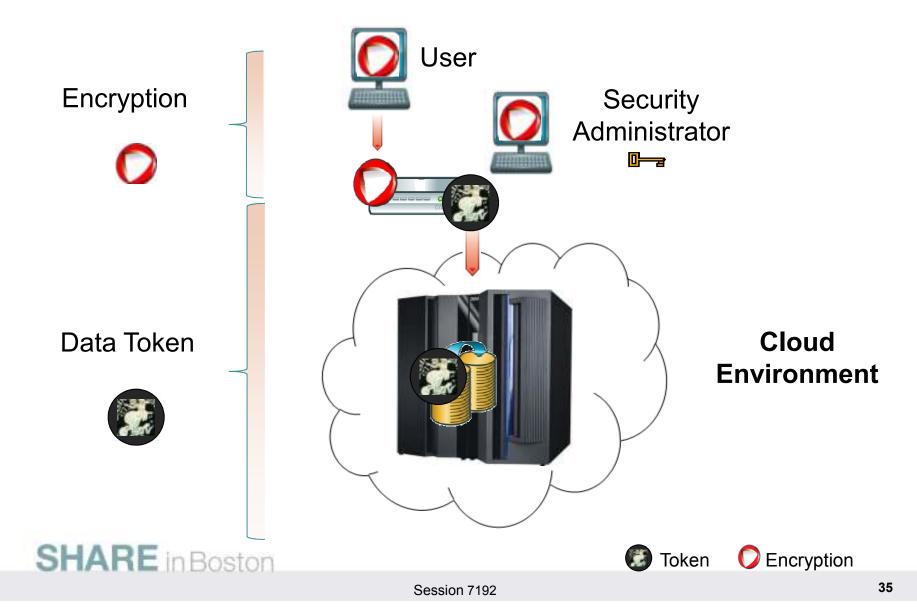
Choose Your Defenses – Positioning of Alternatives





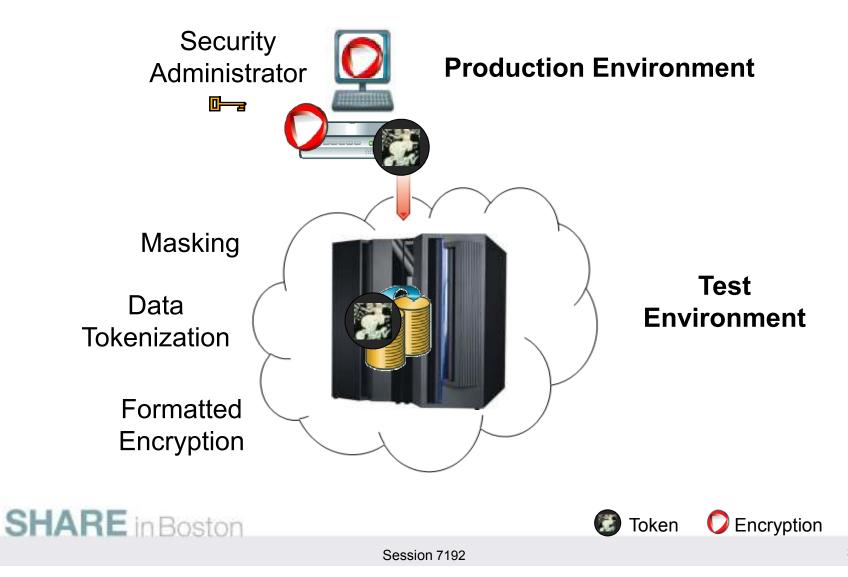
Use Case –Data Protection in Cloud Environments





Use Case – Data Protection in Test/Dev Environments





Data Protection Challenges

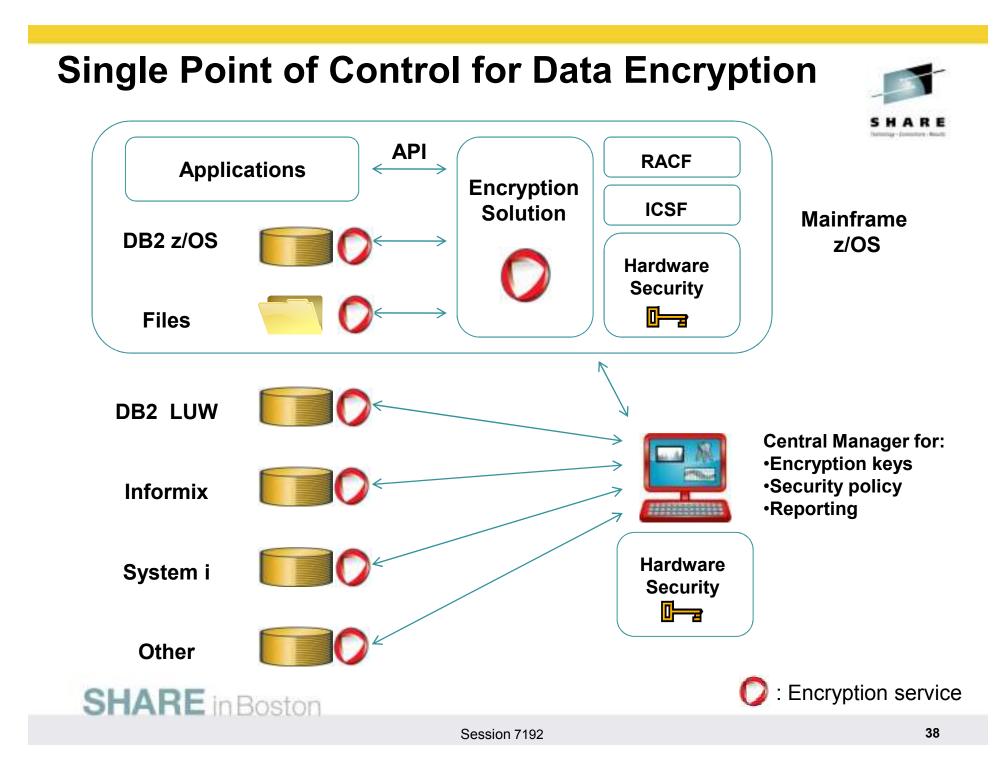
- Actual protection is not the challenge
- Management of solutions
 - Key management
 - Security policy
 - Auditing and reporting
- Minimizing impact on business operations
 - Transparency
 - Performance vs. security
- Minimizing the cost implications
- Maintaining compliance
- Implementation Time











Summary

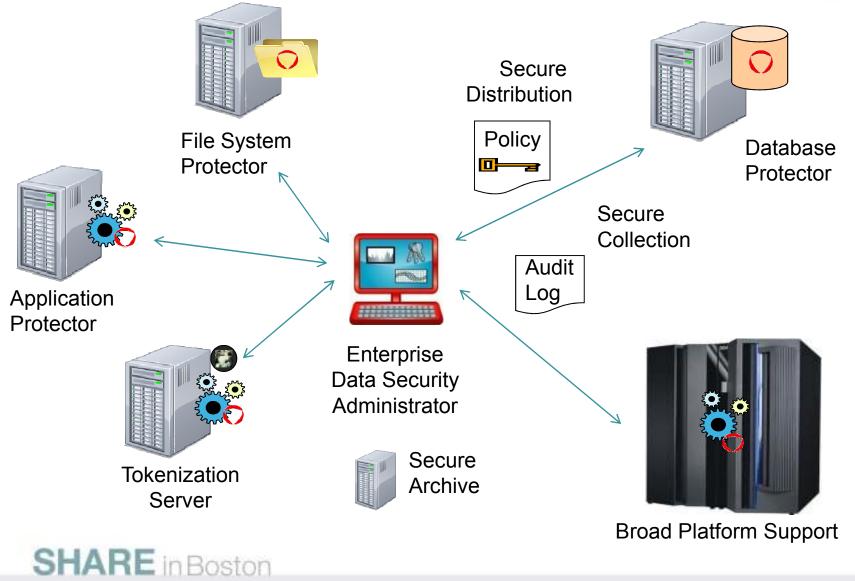


- New threats to data & new regulations
- New "best practices" for data protection
- New approaches for data protection
- Protect the data flow
- Risk-adjusted approach to data security
- Centralized key management, policy and reporting



Protegrity Data Security Management





Protegrity Corporate Overview

- Enterprise Data Security Management
- Founded 1996
- 300+ customers
- Market leader in PCI DSS & PII data security
- 14 patents granted/issued
- Global reach 60% NA, 30% EMEA, 10% Asia







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Appendix



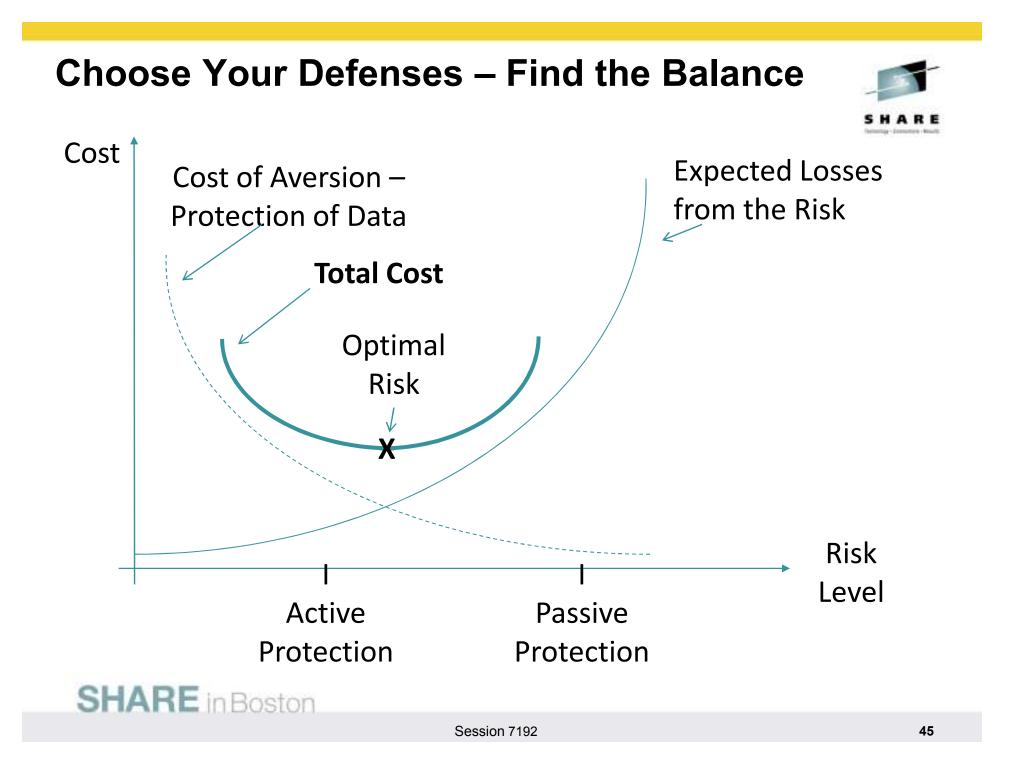


A Risk-adjusted Data Security Plan



- 1. Know Your Data
- 2. Find Your Data
- 3. Understand Your Enemy
- 4. Choose Your Defenses
- 5. Deploy Defenses
- 6. Crunch the Numbers





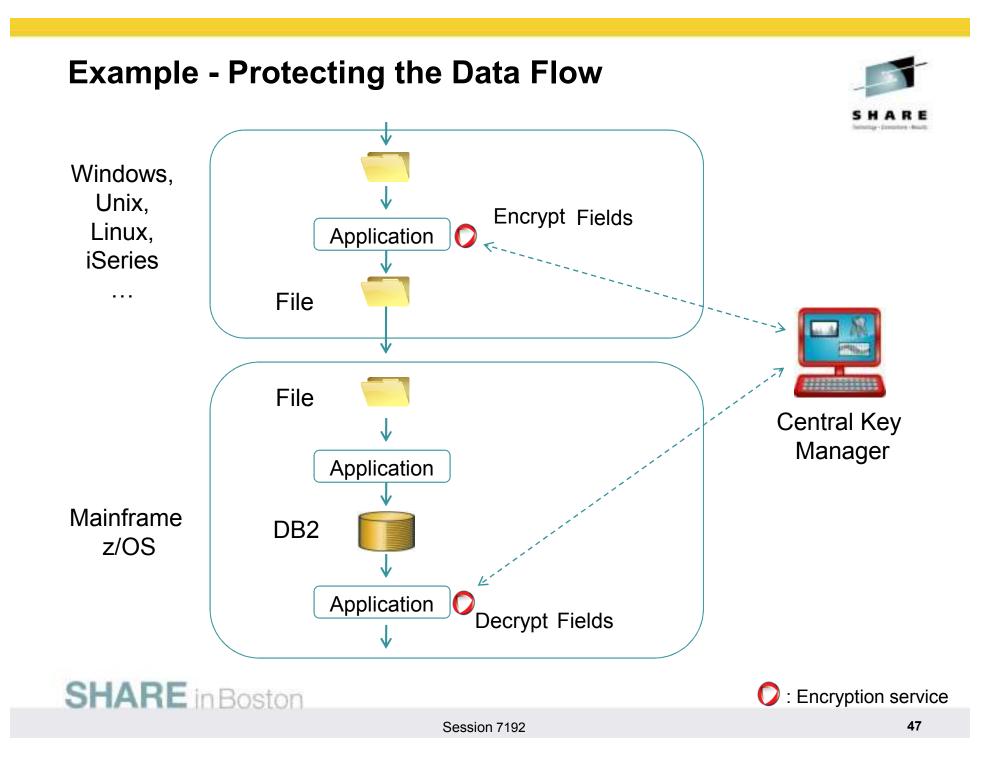
Know Your Data – Identify High Risk Data

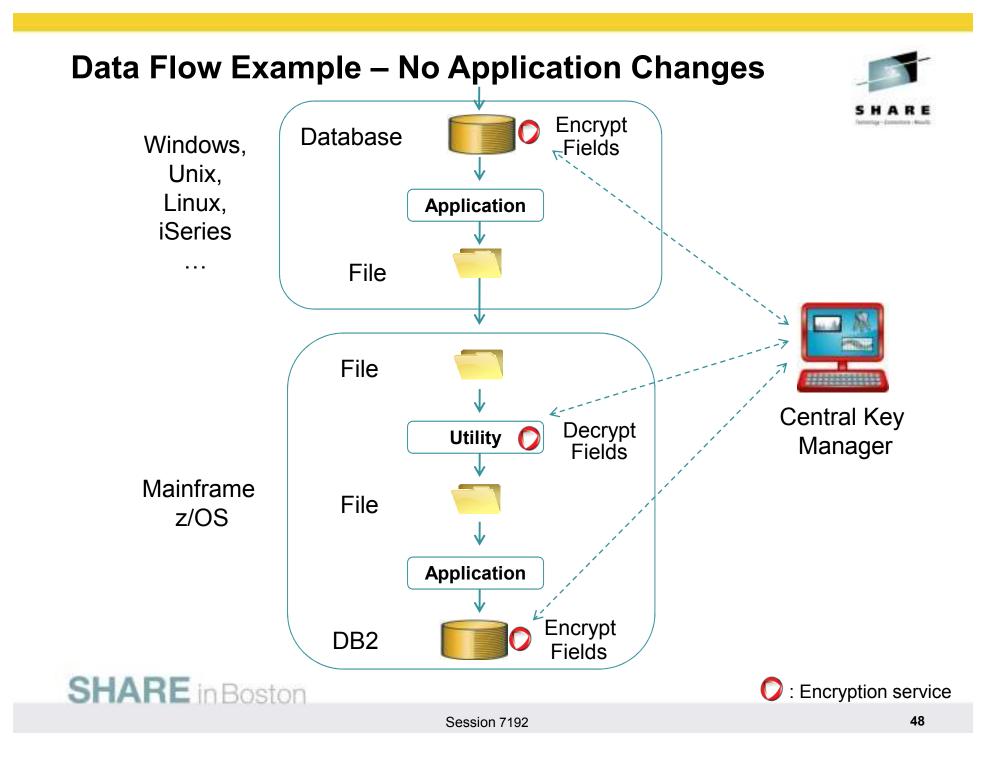


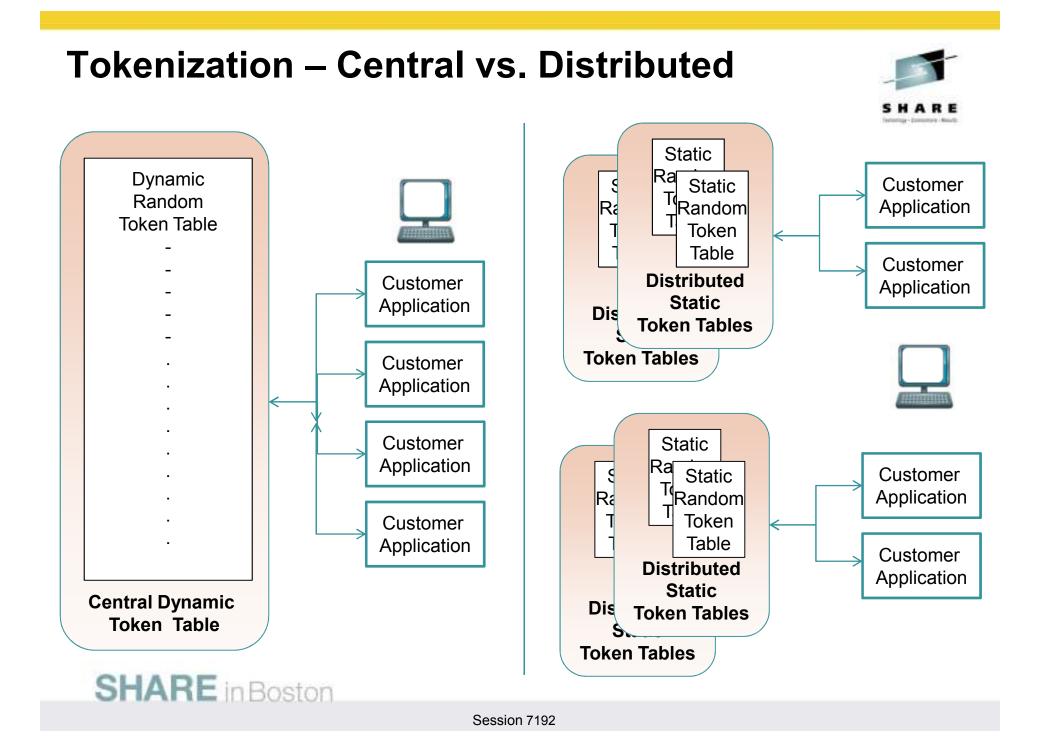
- Begin by determining the risk profile of all relevant data collected and stored
 - Data that is resalable for a profit
 - Value of the information to your organization
 - Anticipated cost of its exposure

Data Field	Risk Level
Credit Card Number	25
Social Security Number	20
CVV	20
Customer Name	12
Secret Formula	10
Employee Name	9
Employee Health Record	6
Zip Code	3



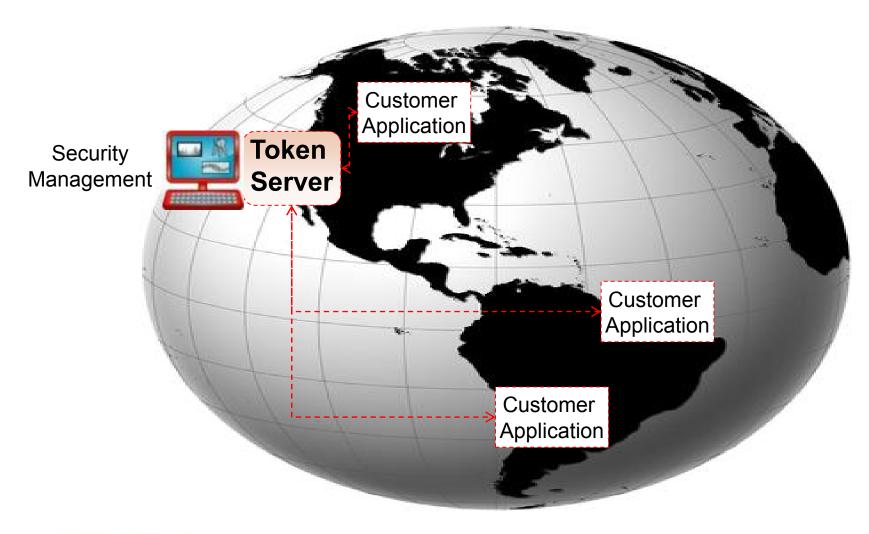






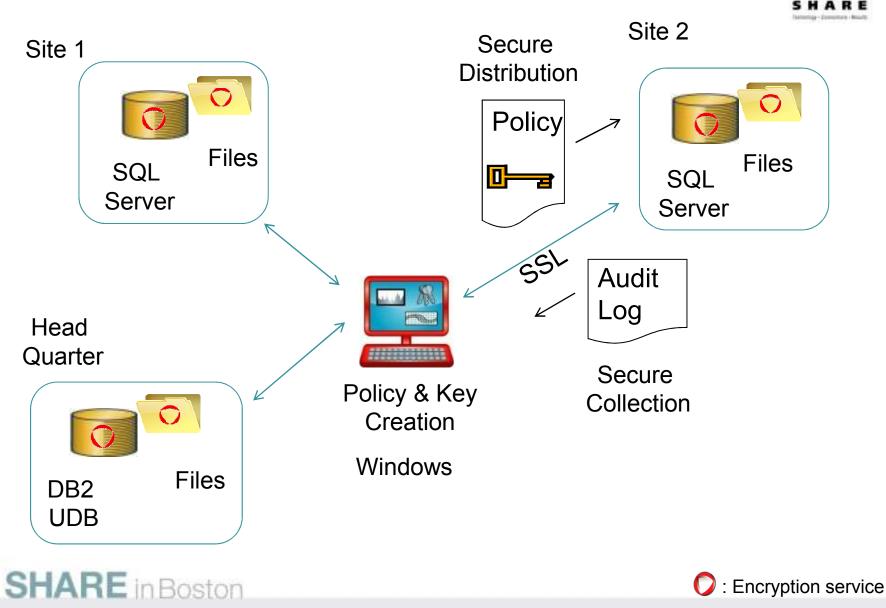
Old Tokenization Approach - One Central Server

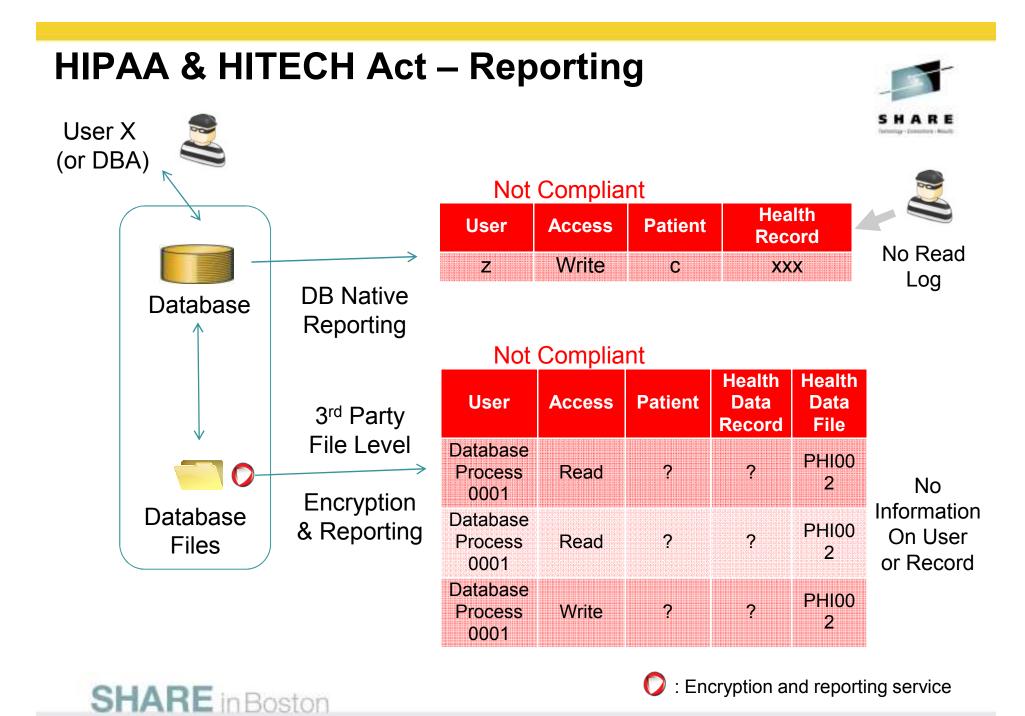






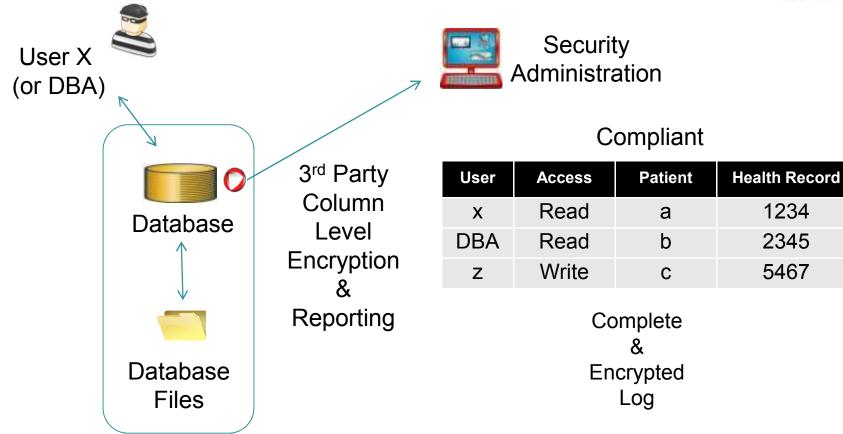
Case Study 3 – Health Information



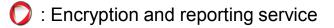


HIPAA & HITECH Act – Reporting



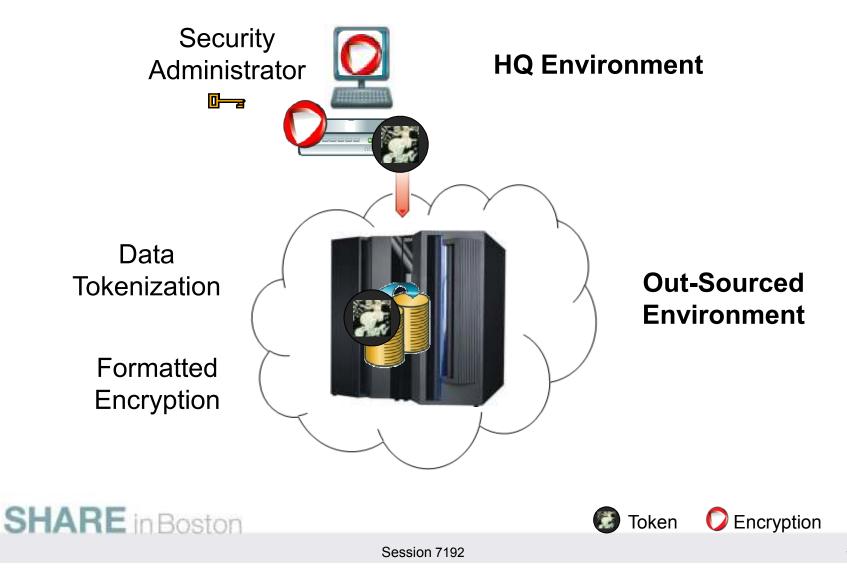


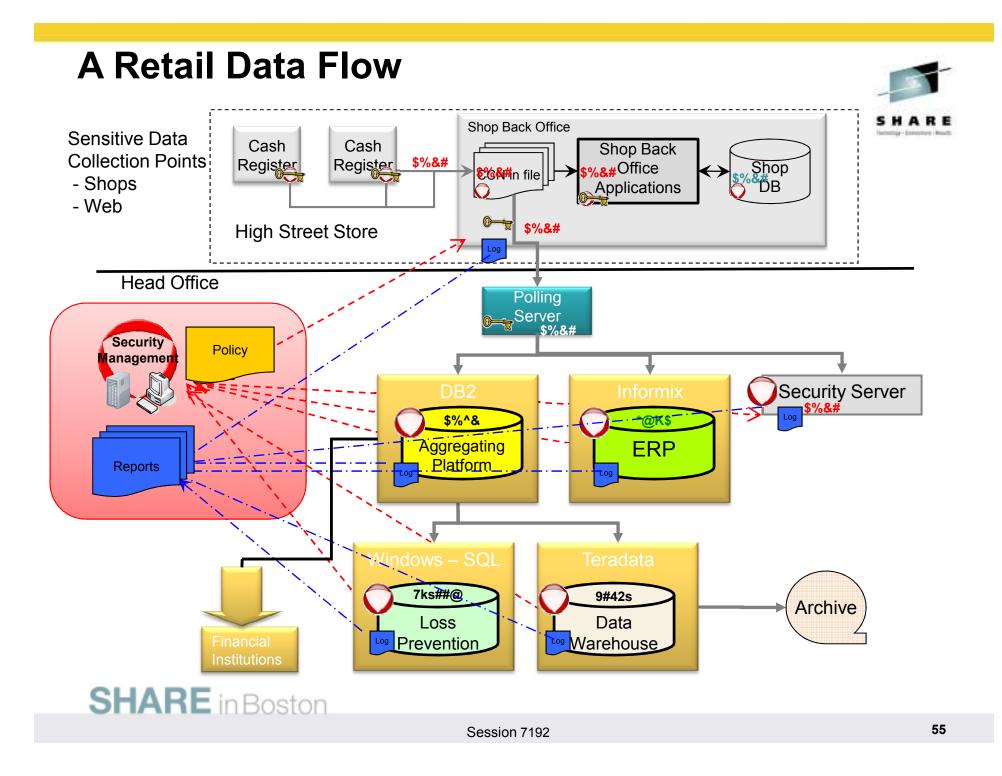




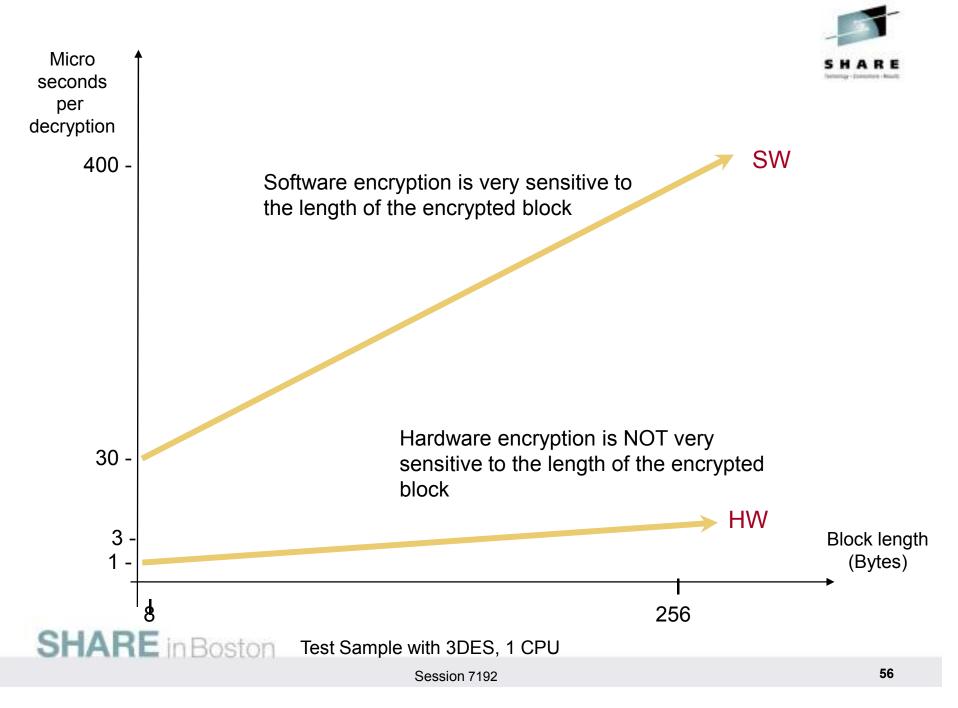
Use Case – Data Protection in Out-sourced Environments

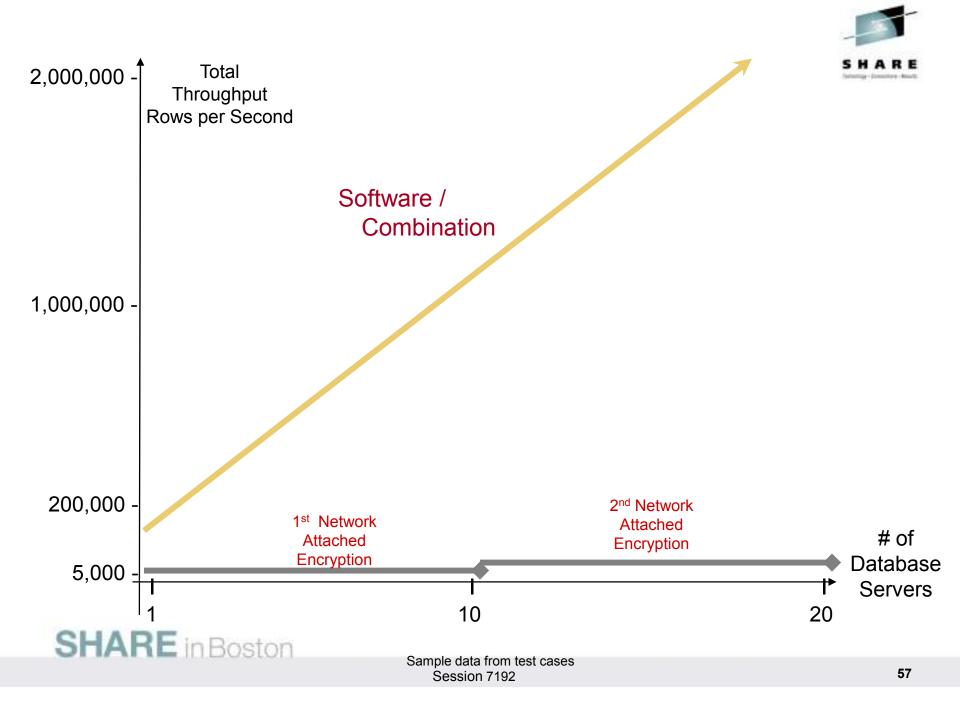






General Encryption time for SW vs. HW on z/OS





Software vs. Hardware Encryption (NAE)



- Performance and Scalability software
 - Leverage the processing power of platform, especially advantageous in larger systems i.e. mainframe, Teradata
 - Solutions scale as data volumes grow
 - Solutions can be rolled out to thousands of remote sites using existing technology
- Performance and Scalability hardware
 - Network Attached Encryption (NAE) devices may be shared across
 protection points, but network latency can be problematic
 - NAEs have set processing power. In general, to scale you must add more boxes
 - Supporting large, 'big-iron' systems can prove challenging



Software vs. Hardware Encryption (NAE)

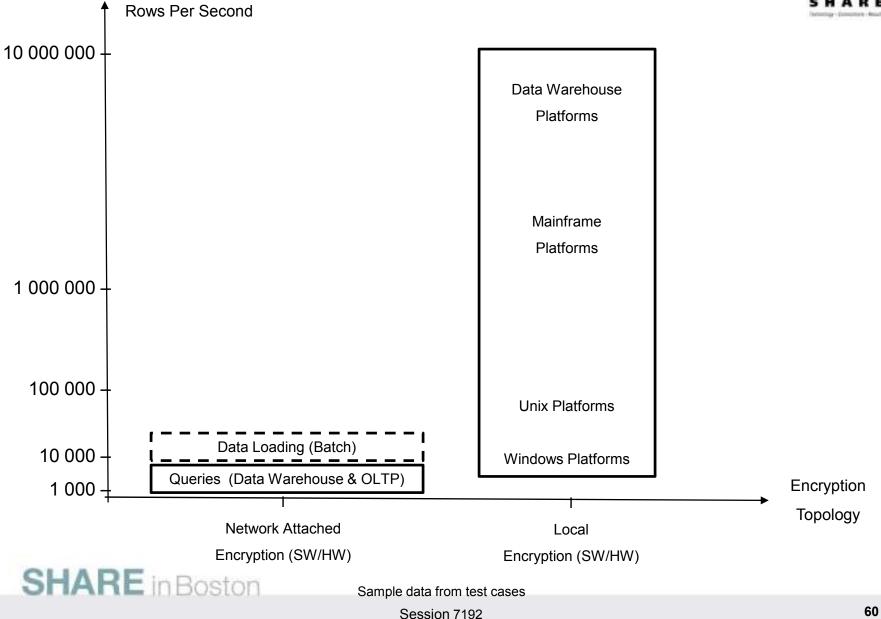


- Total Cost of Ownership software
 - Solutions scale as data volumes grow no need to continually add devices
 - Green factor as software leverages existing IT, no need for additional cooling, rack space or power
- Total Cost of Ownership hardware
 - NAE devices need to be continually added or upgraded to keep up with ever growing data volumes
 - Adding devices for each protection point significantly increases deployment and maintenance costs
 - Reserve space at the local landfill



Column Encryption Performance - Different Topologies





Dataset Comparison – Breach Source



	Verizon IR	DataLossDB
Number of breaches	592	2332
Number of compromised/lost records	516,108,232	721,657,540
Time span of dataset	2004-2008	2000-2009 [°]

Breach Source	Verizon IR	DataLossDB	DataLossDB-MOD
External	73%	56%	79%
Internal	18%	35%	19%
Partner	38%	4%	0%

Source: 2009 Data Breach Investigations Supplemental Report, Verizon Business RISK team

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Dataset Comparison – Industries Represented



Industry	Verizon IR	DataLossDB	DataLossDB-MOD
Retail	54%	8%	9%
Food & Beverage	19%	ND ¹⁰	ND
Financial Services	16%	21%	21%
Technology Services	11%	6%	7%
Manufacturing	5%	6%	6%
Business Services	3%	3%	3%
Education	3%	19%	20%
Healthcare	<1%	13%	13%
Hospitality	2%	1%	<1%
Government	1%	20%	17%
Other/Misc	3%	4%	4%

Source: 2009 Data Breach Investigations Supplemental Report, Verizon Business RISK team

Dataset Comparison – Data Type



Data Type	Verizon IR	DataLossDB	DataLossDB-MOD
Payment card data	84%	14%	17%
Personal Information	31%	89%	87%
Authentication credentials	17%	ND	ND
Account number	16%	11%	10%
Intellectual property	9%	ND	ND
Corporate Financial data	5%	11%	9%
Medical information	3%	9%	8%
Monetary Assets / Funds	11%	ND	ND
Other/Misc ¹¹	26%	11%	11%

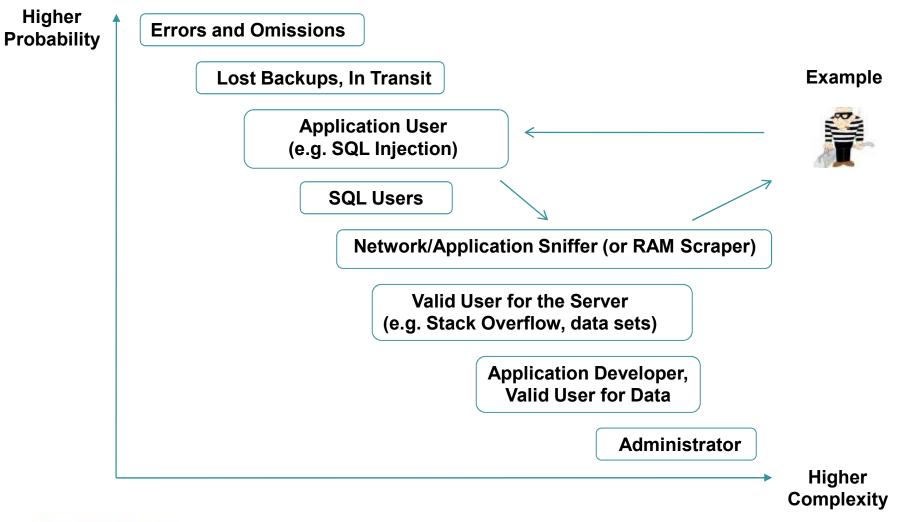
Source: 2009 Data Breach Investigations Supplemental Report, Verizon Business RISK team

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Step 3: Understand Your Enemy & Probability of Attacks

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Source: IBM Silicon Valley Lab(2009)

Application Impact with Different Protection Options



Transparency

Type of Application	Strong Encryption	Formatted Encryption	Token
Can operate on the stored protected value			
Need partial information in clear	\bigcirc		
Need full clear text information		\bigcirc	\bigcirc

Security

Type of Application	Strong Encryption	Formatted Encryption	Token
Can operate on the stored protected value		$\overline{}$	
Need partial information in clear	G	$\overline{}$	
Need full clear text information	G		

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Application Impact with Different Protection Options



Performance and scalability

Type of Application	Strong Encryption	Formatted Encryption	Token
Can operate on the stored protected value			
Need partial information in clear	G		
Need full clear text information		\bigcirc	\bigcirc

Availability

Type of Application	Strong Encryption	Formatted Encryption	Token
Can operate on the stored protected value			
Need partial information in clear			
Need full clear text information			\bigcirc

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