SULLIVAN COUNTY RURAL ELECTRIC COOPERATIVE, INC.
FORKSVILLE, PA

Board Policy No. 604

SUBJECT: Merchant Security Policy

I. PURPOSE

To establish policy for secure handling of sensitive card holder data including but not limited to magnetic strip data, Primary Account Numbers (PAN's), expiration date, and service code. To detail the requirements for safeguarding Cooperative's cardholder data for Payment Card Industry (PCI) compliance.

II. CONTENT

A. Protecting Cardholder Data

Protecting cardholder data is paramount. Allowing data theft or destruction, inadvertently sharing confidential information, infecting system networks with viruses, misusing Cooperative resources, allowing theft of Cooperative property and allowing compromise of private or confidential Cooperative or client information are examples of what might result from a security compromise.

1. The cooperative shall contract with a 3rd party PCI Compliant Service Provider to handle all cardholder transactions.

B. Policy Maintenance and Employee/Contractor Awareness

1. Review of this policy will be conducted on an annual basis or as changes to the environment occurs.
2. Operations Assistant II is designated with security responsibility.
3. A list of Service Providers must be maintained. This list will be updated and reviewed by Operations Assistant II when necessary but at least annually.
4. A written Agreement is required from each Service Provider including an acknowledgement that they are responsible for the security of cardholder data they posses.
5. Due diligence is to be performed prior to the engagement of Service Providers. Procedures performed will include when possible:

a. A written statement acknowledging their responsibilities to securely process, handle and transmit cardholder data.
b. Written proof that the Service Provider is PCI compliant.
c. Request reliable industry references.

6. A program is to be maintained to monitor Service Providers' PCI DSS compliance status.

   a. An independent agency shall run quarterly Payment Card Industry Data Security Standard (PCI DSS) external vulnerability scans.
   b. An independent agency shall complete an annual security assessment for Self-Assessment Questionnaire (SAQ) type D.

III. RESPONSIBILITY

The Chief Executive Officer is responsible for compliance.

IV.

This policy supersedes and cancels all other policies which relate to the subject matter.

Date adopted:	February 6, 2014	Attest:	Walter E. Botsford, Secretary
Revised:	February 20, 2020		Kathy A. Robbins, Secretary
	March 16, 2023		Kathy A. Robbins, Secretary
	February 15, 2024		

Kathy A. Robbins, Secretary