

## CREDIT CARD ACCEPTANCE POLICY

### I. PURPOSE

The purpose of this policy is to establish business processes and procedures for accepting Credit and Debit cards at Grand Traverse County. The policy will minimize risk and provide the greatest value, security of data, and availability of services to each Grand Traverse County Employee within the rules and regulations established by the Payment Card Industry (PCI) and articulated in the PCI Data Security Standards (DSS). Additionally, these processes are intended to ensure that payment card acceptance procedures are appropriately integrated with the Grand Traverse County's accounting and other systems.

### II. BACKGROUND

In response to increasing incidents of identity theft, the major payment card companies created the Payment Card Industry Data Security Standard (PCI DSS) to help prevent theft of customer data. PCI DSS applies to all businesses that accept payment cards to procure goods or services. Compliance with this Standard is enforced by the payment card companies. Generally, noncompliance is discovered when an organization experiences a security breach that includes cardholder data.

Security breaches can result in serious consequences for Grand Traverse County, including release of confidential information, damage to reputation, the assessment of substantial fines, possible legal liability and the potential loss of the ability to accept payment card and eCommerce payments. Grand Traverse County will take every effort to ensure that Data Security Standards are adhered to.

### III. DEFINITIONS

Cardholder: The customer to whom a credit or debit card has been issued or the individual authorized to use the card.

Cardholder Data: All personally identifiable data about the cardholder (i.e., account number, expiration date, and cardholder name.)

Company: Management Accounting and Executive offices that approves all third-party service providers and coordinates the policies and procedures for accepting Credit and Debit cards at Grand Traverse County.

Encryption: The process of converting information into an unintelligible form to anyone except holders of a specific cryptographic key. Use of encryption protects information between the encryption process and the decryption process against unauthorized disclosure.

Staff Employee: For the purposes of the PCI DSS and this policy, a Staff Employee is defined as entity that accepts Credit or Debit cards bearing the logos of any of the five members of the Payment Card Industry Security Standards Council (American Express, Discover, MasterCard or VISA) as payment for Grand Traverse County training and/or services.

Grand Traverse County Management: A Grand Traverse County employee within a department who has primary authority and responsibility for Credit or Debit card and eCommerce transaction processing within that department.

Payment Card: Any Credit or Debit card/device that bears the logo of American Express, Discover Financial Services, JCB International, MasterCard Worldwide, or VISA, Inc.

Credit or Debit Card Account Change: Any change in the payment account including, but not limited to: the use of existing Credit or Debit card accounts for new purposes; the alternation of business processes that involve Credit or Debit card processing activities; the addition or alteration of payment systems; the addition or alternation of relationships with third-party Credit or Debit card service providers, and the addition or alternation of Credit or Debit card processing technologies.

Credit or Debit Card Industry (PCI) Data Security Standard (DSS): A multi-faceted security standard that includes requirements for security management, policies, procedures, network architecture, software design and other critical protective measures.

Sensitive Authentication Data: Security-related information (card validation codes/values, full magnetic-stripe data, or personal identification number (PIN)) used to authenticate cardholders, appearing in plain-text or otherwise unprotected form.

#### IV. TERMS AND CONDITIONS

This policy applies to all Grand Traverse County employees, Members, Non-Members, Consultants, or Agents who, in the course of doing business on behalf or with Grand Traverse County, accept, process, transmit, or otherwise handle cardholder information in physical or electronic format.

This policy applies to all Grand Traverse County departments and administrative areas which accept Credit or Debit cards regardless of whether revenue is deposited in a Grand Traverse County financial account.

#### V. ACCEPTABLE CREDIT OR DEBIT CARDS

Grand Traverse County currently accepts VISA, MasterCard, Discover and American Express Card and has negotiated contracts for processing Credit or Debit card transactions. Individual Grand Traverse County employees may not use or negotiate individual contracts with these or other Credit or Debit card companies or processors. All individual Grand Traverse County employees must use the Grand Traverse County negotiated contract.

Current Vendors: G2G, Official Payments, 5/3<sup>rd</sup> World Pay, Invoice Cloud, CP3, EVO, Finet Solutions, Active Network

#### VI. PROHIBITED CREDIT OR DEBIT CARD ACTIVITIES

Grand Traverse County prohibits certain credit card activities that include, but are not limited to:

- accepting Credit or Debit cards for cash advances
- discounting training or service based on the method of payment
- adding a surcharge or additional fee to Credit or Debit card transactions

## VII. CREDIT OR DEBIT CARD FEES

Each Credit or Debit card transaction may have an associated fee charged by the credit card company depending on which platform is utilized. Any fee will be clearly posted at point of sale terminal location.

## VIII. REFUNDS

If it is found that a credit card charge was processed in error a refund may be processed. The refund must be credited back to the account that was originally charged. Refunds in excess of the original sale amount or cash refunds are prohibited.

## IX. CHARGEBACKS

Occasionally a customer will dispute a Credit or Debit card transaction, ultimately leading to a chargeback. In the case of a chargeback, Grand Traverse County's Treasurers department will be responsible for distributing charge backs to appropriate departments for proper correction.

## X. MAINTAINING SECURITY

1. Departments and administrative areas accepting Credit or Debit cards on behalf of Grand Traverse County are subject to the Credit or Debit Card Industry Data Security Standards (PCI DSS).
2. Fax transmissions (both sending and receiving) of credit card and electronic payment information occurs using only fax machines which are attended by those individuals who must have contact with Credit or Debit card data to do their jobs;
3. Grand Traverse County requires that all external services providers that handle Credit or Debit card information be PCI compliant.
4. Grand Traverse County restricts access to cardholder data to those with a business "need-to-know."
5. For electronic media, cardholder data shall not be stored on servers, local hard drives, or external (removable) media including floppy discs, CDs or thumb (flash) drives unless encrypted and otherwise in full compliance with PCI DSS. For paper media, cardholder data shall not be stored.

## XI. RESPONSIBILITIES

Grand Traverse County Employees are responsible for:

Executing on behalf of the Grand Traverse County Department, Credit or Debit Card Account transactions.

Ensuring that all employees, contractors and agents with access to Credit or Debit card data within the relative Grand Traverse County Department acknowledge on an annual basis and in writing that they have read and understood this Policy. These acknowledgements should be submitted, as requested, to Grand Traverse County's Treasurers department ensuring that all Credit or Debit card data collected by the Grand Traverse County Department in the course of performing Grand Traverse County's business, regardless of whether the data is stored physically or electronically is secured.

Data is considered to be secured only if all of the following criteria are met:

1. Only those with a "need-to-know" are granted access to Credit or Debit card and electronic payment data;
2. Email should not be used to transmit credit card or personal payment information. If it should be necessary to transmit credit card information via email only the last four digits of the credit card number should be displayed;
3. Credit card or personal information is never downloaded onto any portable devices or media such as USB flash drives, compact disks, laptop computers or personal digital assistants;
4. The processing and storage of personally identifiable credit card or payment information on Grand Traverse County computers and servers is prohibited;
5. Only secure communication protocols and/or encrypted connections to the authorized vendor are used during the processing of eCommerce transactions;
6. The three or four digit validation code, or full contents of any track data from the magnetic stripe, or personal identification number (PIN) or encrypted PIN block are never stored in any form;
7. All but the last four digits of any credit card account number are masked when it is necessary to display credit card data;
8. All media containing Credit or Debit card or personal payment data is retained no longer than a maximum of six (6) months and then destroyed or rendered unreadable; and
9. Notifying the Department Head and Treasurers office in the event of suspected or confirmed loss of cardholder data. Details of any suspected or confirmed breach should not be disclosed in any email correspondence. After normal business hours, notification shall be made to the Treasurer.

Grand Traverse County shall:

1. Provide training video to ensure that Grand Traverse County employees are trained in accepting and processing Credit or Debit cards in compliance with this policy;
2. Work with external vendors to coordinate Credit or Debit card policies, standards, and procedures;
3. Serve as liaison between Financial Management Services, Information Technology Services, and the Grand Traverse County employee for Credit or Debit Card account acquisition or change procedures;
4. Review and modify the Application for Credit or Debit Card Account Acquisition or Change as necessary.

Grand Traverse County will conduct Internal Auditing to:

1. Periodically review Grand Traverse County employee compliance with this policy and the Credit or Debit Card Industry (PCI) Data Security Standards (DSS);
2. Identify unapproved payment applications or external vendors that collect Credit or Debit card data on behalf of Grand Traverse County and notify Treasurer;
3. When required, conduct the Grand Traverse County's PCI DSS Self-Assessment and complete the Grand Traverse County's Attestation of Compliance.

## XII. WIRELESS TECHNOLOGY

Grand Traverse County will use wireless technology to process or transmit cardholder data over a secured network. Our Secure Sockets Layer (SSL) software is the industry standard and among the best software available today for secure commerce transactions. It encrypts all personal information, including credit card number, name, and address, so that it cannot be read over the internet. Grand Traverse County employees will never transmit cardholder data over an unsecured network. The storage of cardholder data on local hard drives, floppy disks or other external media is prohibited. It is also prohibited to use cut-and-paste and print functions during remote access.

## XIII. SANCTIONS

The Treasurer may suspend credit card account privileges of any Grand Traverse County department not in compliance with this policy or that places Grand Traverse County at risk.

## XIV. TRAINING

Employees who are expected to be given access to cardholder data shall be required to view a training video and complete the Credit Card Processing Acknowledgement upon hire.