

Parking Services

UNIVERSITY OF COLORADO BOULDER

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Parking Services 1050 Regent Drive, UCB 502 Boulder, CO 80309 (303) 735-PARK (7275)

## PS CREDIT CARD INCIDENT RESPONSE POLICY/PLAN

Effective Date:	March 1, 2025
Topic:	Response to a Credit Card Security Incident
Prepared by:	Tracy Humphrey, Asst Dir Finance
Approved by:	Tom McGann, Director, Parking Services (PS)
Applies to:	All PS employees

## POLICY

If a compromise of records containing cardholder information is discovered OR suspected:

- 1. Notify supervisor immediately of potential compromise and in any case no later than 1 business day after discovery.
- 2. Supervisor and employee will determine the facts and circumstances of the potential compromise. Supervisor should notify Business Technology and Systems to coordinate with payment vendors.
- 3. Supervisor must bring findings to their unit's Assistant Director within two business days.
- 4. Assistant Director will immediately notify the Director of Parking and the Assistant Director Finance.
- 5. Director or AD Finance will notify the Treasurer's Office of the incident within 1 business day, and in any case no later than 3 business days after initial discovery of the potential compromise. Notification must also be sent to CU's Office of Information Security (filing a security ticket with CU Help Desk) and campus counsel that there is a potential incident involving cardholder information and/or personally identifiable information.
- 6. If it appears that a crime was committed as part of the incident, the Director will notify campus police immediately and in no case later than 3 business days after discovery of the potential compromise.

- 7. The Treasurer's Office and the Office of Information Security, in consultation with the Director and relevant Assistant Directors, will determine the next steps to be taken, including, at a minimum:
  - a. How to best contain and limit the exposure of cardholder information;
  - b. How to mitigate the consequences of the incident;
  - c. Whether to notify the University's Acquiring Bank and/or payment card associations;
  - d. (In consultation with the Campus Controller) How to change the department's business practices to prevent future occurrences of this or similar incidents
- 8. Review this policy annually and modify according to lessons learned and to incorporate industry developments.

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Director, Parking Services:	Tom McGann, 303-492-9693 Tom.McGann@colorado.edu
Office of Information Security	Lincoln Nkin Lincoln.Nkin@colorado.edu Pci-compliance@colorado.edu
Boulder Campus Counsel:	303-492-7481
Campus Police:	Non-emergency number 303-492-6666
Treasurer's Office:	Alisha Palas, Assistant Treasurer 303-837-2135 <u>Alisha.palas@cu.edu</u>

Contacts: