# **NIST SPECIAL PUBLICATION 1800-27B**

# Securing Property Management Systems

Volume B: Approach, Architecture, and Security Characteristics

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#### **FEEDBACK**

As a private-public partnership, we are always seeking feedback on our practice guides. We are particularly interested in seeing how businesses apply NCCoE reference designs in the real world. If you have implemented the reference design, or have questions about applying it in your environment, please email us at hospitality-nccoe@nist.gov.

All comments are subject to release under the Freedom of Information Act.

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#### NATIONAL CYBERSECURITY CENTER OF EXCELLENCE

The National Cybersecurity Center of Excellence (NCCoE), a part of the National Institute of Standards and Technology (NIST), is a collaborative hub where industry organizations, government agencies, and academic institutions work together to address businesses' most pressing cybersecurity issues. This public-private partnership enables creation of practical cybersecurity solutions for specific industries, as well as for broad, cross-sector technology challenges. Through consortia under Cooperative Research and Development Agreements (CRADAs), including technology partners—from Fortune 50 market leaders to smaller companies specializing in information technology security—the NCCoE applies standards and best practices to develop modular, easily adaptable example cybersecurity solutions using commercially available technology. The NCCoE documents these example solutions in the NIST Special Publication 1800 series of practice guides, which maps capabilities to the NIST Cybersecurity Framework and details the steps needed for another entity to re-create the example solution. The NCCoE was established in 2012 by NIST in partnership with the State of Maryland and Montgomery County, Maryland.

To learn more about the NCCoE, visit <u>https://www.nccoe.nist.gov/</u>. To learn more about NIST, visit <u>https://www.nist.gov.</u>

#### NIST CYBERSECURITY PRACTICE GUIDES

NIST Cybersecurity Practice Guides (Special Publication 1800 series) target specific cybersecurity challenges in the public and private sectors. They are practical, user-friendly guides that facilitate the adoption of standards-based approaches to cybersecurity. They show members of the information security community how to implement example solutions that help them align with relevant standards and best practices, and provide users with the materials lists, configuration files, and other information they need to implement a similar approach.

The documents in this series describe example implementations of cybersecurity practices that businesses and other organizations may voluntarily adopt. These documents do not describe regulations or mandatory practices, nor do they carry statutory authority.

#### ABSTRACT

Hotels have become targets for malicious actors wishing to exfiltrate sensitive data, deliver malware, or profit from undetected fraud. Property management systems, which are central to hotel operations, present attractive attack surfaces. This example implementation strives to increase the cybersecurity of the property management system (PMS) and offer privacy protections for the data in the PMS. The objective of this guide was to build a standards-based example implementation that utilizes readily available commercial off-the-shelf components that enhance the security of a PMS.

The NCCoE at NIST built a PMS reference design in a laboratory environment to demonstrate methods to improve the cybersecurity of a PMS. The PMS reference design included the PMS, a credit card payment platform, and an analogous ancillary hotel system. In this example implementation, a physical access control system was used as the ancillary system.

The principal capabilities include protecting sensitive data, enforcing role-based access control, and monitoring for anomalies. The principal recommendations include implementing cybersecurity concepts such as zero trust architecture, moving target defense, tokenization of credit card data, and role-based authentication.

The PMS environment outlined in this guide encourages hoteliers and similar stakeholders to adopt effective cybersecurity and privacy concepts by using standard components that are composed of open-source and commercially available components.

#### **KEYWORDS**

access control; hospitality cybersecurity; moving target defense; PCI DSS; PMS, privacy; property management system; role-based authentication; tokenization; network security; zero trust architecture

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The Technology Partners/Collaborators who participated in this project submitted their capabilities in response to a notice in the Federal Register [1]. Respondents with relevant capabilities or product components were invited to sign a Cooperative Research and Development Agreement (CRADA) with NIST, allowing them to participate in a consortium to build this example solution. We worked with:

Technology Partner/Collaborator	Build Involvement
Cryptonite	network protection appliance that provides additional layer of protection against cyber attacks
ForeScout	policy-based control enforcement for guest Wi-Fi net- works and visualizations of diverse types of network-con- nected devices
Häfele	physical access control system, including door locks, room-key encoding, and management
Remediant	real-time incident monitoring and detection, privilege es- calation management, and reporting functions
StrongKey	payment solution appliance that secures credit card transactions and shrinks the Payment Card Industry com- pliance enclave
TDi	access control platform that secures connections and pro- vides control mechanisms to enterprise systems for au- thorized users and authorized devices; also monitors ac- tivity down to the keystroke

## Contents

1 Summary			L	
	1.1	Challe	nge	1
	1.2	Impler	nentation	1
		1.2.1	PMS Reference Design	2
		1.2.2	Standards and Guidance	2
	1.3	Benefi	ts	3
2	Hov	v to U	se This Guide	1
	2.1	Туроді	raphic Conventions	5
3	Арр	roach	<u> </u>	5
	3.1	Audier	nce6	5
	3.2	Scope		5
	3.3	Assum	ptions	7
	3.4	Risk As	ssessment	7
		3.4.1	Threats	3
		3.4.2	Vulnerabilities	3
		3.4.3	Cybersecurity Control Map	3
		3.4.4	Privacy Control Map	Э
4	Arc	hitect	ure9	9
	4.1	Archite	ecture Description	Э
		4.1.1	High-Level Architecture	C
	4.2	Use Ca	ses Supported by the Property Management System Reference Design12	2
		4.2.1	Use Case 1: PMS Accepts Reservation	2
		4.2.2	Use Case 2: Authorized User Access	2
		4.2.3	Use Case 3: Secure Credit Card Transaction12	2
		4.2.4	Use Case 4: Secure Interaction of Ancillary Hotel System with PMS13	3
	4.3	Proces	s Flows	3
		4.3.1	Authorized Employee Access13	3

		4.3.2	Secure Credit Card Transaction	14
		4.3.3	Secure Interaction of Ancillary Hotel System (with PMS)	15
		4.3.4	Hotel Guest Internet Access via Hotel Guest Wi-Fi	16
5	Sec	urity (	Characteristic Analysis	17
	5.1	Analys	is Assumptions and Limitations	. 17
	5.2		is of the Reference Design's Support for Cybersecurity Framework tegories	. 17
		5.2.1	ID.AM-1: Physical devices and systems within the organization are inventoried	18
		5.2.2	ID.AM-2: Software platforms and applications within the organization are inventoried	18
		5.2.3	PR.AC-1: Identities and Credentials are Issued, Managed, Verified, Revoked, Audited, Proofed and Bound to Credentials, and Asserted in Interactions for Authorized Devices, Users and Processes	18
		5.2.4	PR.AC-6: Identities are proofed and bound to credentials and asserted in interactions	18
		5.2.5	PR.AC-3: Remote access is managed	18
		5.2.6	PR.AC-4: Access permissions and authorizations are managed, incorporating the principles of least privilege and separation of duties	18
		5.2.7	PR.AC-7: Users, devices, and other assets are authenticated (e.g., single-factor, multi-factor) commensurate with the risk of the transaction (e.g., individuals' security and privacy risks and other organizational risks)	19
		5.2.8	PR.DS-1: Data-at-rest is protected	19
		5.2.9	PR.DS-2: Data-in-transit is protected	19
		5.2.10	PR.IP-3 Configuration change control processes are in place	19
		5.2.11	PR.PT-4 Communications and control networks are protected	19
		5.2.12	DE.CM-1 The network is monitored to detect potential cybersecurity events	19
		5.2.13	DE.CM-3 Personnel activity is monitored to detect potential cybersecurity events	19
		5.2.14	DE.CM-7 Monitoring for unauthorized personnel, connections, devices, and software is performed	20
		5.2.15	DE.DP-4: Event detection information is communicated	20
	5.3	Zero T	rust	. 20
		5.3.1	Zero Trust Tenets	20

		5.3.2	Components of Zero Trust	24
6	Priv	acy C	Characteristic Analysis	26
	6.1	Analy	sis Assumptions and Limitations	26
	6.2	Priva	cy Protections of the Reference Design	26
7	Fun	ction	al Evaluation	26
	7.1	Test (	Cases	26
		7.1.1	PMS Use Case Requirements	27
		7.1.2	Test Case PMS-01 (Authorized Hotel Staff User Can Log In)	29
		7.1.3	Test Case PMS-02 (PMS Authentication)	29
		7.1.4	Test Case PMS-03 (Authorized Users Can Access Only Systems and Data They Are Authorized for Test Cases)	30
		7.1.5	Test Case PMS-04 (Guest Reservation Editable)	33
		7.1.6	Test Case PMS-05 (Room-Key Provisioning)	34
		7.1.7	Test Case PMS-06 (Provisioning Guest Wi-Fi Access)	35
		7.1.8	Test Case PMS-07 (Secure Credit Card Transaction)	37
		7.1.9	Test Case PMS-08 (Authorized Device Provisioning)	39
		7.1.10	Test Case PMS-09 (Prevent Unauthorized Device from Connecting)	40
8	Fut	ure B	uild Considerations	41
Ар	pend	dix A	Mapping to Cybersecurity Framework	42
Ар	pene	dix B	Privacy Framework Mapping	54
Ар	pend	dix C	Deployment Recommendations	55
Ар	pend	dix D	List of Acronyms	56
Ар	pend	dix E	Glossary	57
Ар	pend	dix F	References	59

# List of Figures

Figure 4-1 Secure PMS High-Leve	el Architecture	.0
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Figure 4-2 Staff Process Flow	14
Figure 4-3 Secure Credit Card Process Flow	15
Figure 4-4 Secure Interaction of Ancillary System with PMS Process Flow	16
Figure 4-5 Guest Internet Access Via Guest Wi-Fi Process Flow	17
Figure 5-1 Tenets of Zero Trust	21
Figure 5-2 Components of Zero Trust	25

## **List of Tables**

Table 4-1 Components, Functions, Technologies    11
Table 5-1 Zero Trust Tenets/Components/Cybersecurity Framework Subcategories         22
Table 5-2 Zero Trust Component and PMS Reference Design Component Mapping
Table 7-1 Test Case Fields   27
Table 7-2 Functional Analysis Requirements   27
Table 7-3 Authorized User Can Log In   29
Table 7-4 PMS Authentication   30
Table 7-5 No Unauthorized Lateral Movement
Table 7-6 Prevent Unauthorized Function   32
Table 7-7 Only Authorized Data
Table 7-8 Guest Reservation Editable   34
Table 7-9 Provisioning Room Key
Table 7-10 Guests' Limited Wi-Fi Access
Table 7-11 Prevent Unauthorized Guest Lateral Movement via Wi-Fi         36
Table 7-12 Tokenized Credit Card Data   37
Table 7-13 Verify that Credit Card Data Is Hidden
Table 7-14 Authorized Device Provisioning   39
Table 7-15 Prevent Unauthorized Device from Connecting         40
Table A-1 Securing Property Management Systems: NIST Cybersecurity Framework Components         Mapping

Table B-1 Securing Property Management Systems: NIST Privacy Framework Components
Mapping

### **1** Summary

Hotel operators rely on a property management system (PMS) for daily administrative tasks such as reservations, availability, pricing, occupancy management, check-in/out, guest profiles, guest preferences, report generation, planning, and record keeping, which includes financials. This PMS controls the on-site property activities for guests and colleagues and connects with other applications such as the hotel point-of-sale (POS) and central reservation system (CRS), which support availability, reservations, and guest profile information.

Additionally, various interfaces are available to create further links from the PMS to internal and external systems such as room-key systems, restaurant and banquet solutions, sales and catering applications, minibars, telephone and call centers, revenue management, on-site spas, online travel agents, guest Wi-Fi, loyalty solutions, and payment providers.

The value of the data in a PMS and the number of connections to a PMS make it a target for bad actors. This guide documents a system that prevents unauthorized access to a PMS and applies both security and privacy protections to the data used in the PMS.

### 1.1 Challenge

Volume A of this publication described why the National Cybersecurity Center of Excellence (NCCoE) accepted a hospitality cybersecurity challenge as a project. Here, in Volume B, the focus shifts to the challenge of building an example implementation that offers hotel owners and operators some options to secure their property management systems.

Securing Property Management Systems supports the following security and privacy characteristics:

- prevents unauthorized access via role-based authentication
- protects from unauthorized lateral movement and privilege escalation attacks
- prevents theft of credit card and transaction data via data tokenization, explicitly allows only identified entities access (allowlisting), and enables access control enforcement
- increases situational awareness by auditing, system activity logging, and reporting
- prevents unauthorized use of personal information

To build the example implementation, hereafter known as the PMS reference design, the project collaborators reached consensus on an architecture that implements aspects of a zero trust architecture (ZTA), moving target defense (MTD), and data tokenization to reduce cybersecurity risk for a hotel's PMS.

#### **1.2 Implementation**

The project demonstrates to hospitality organizations how to protect against loss and misuse of customer data and how to provide more cybersecurity and privacy for guest Wi-Fi networks, employee workstations, and electronic door locks.

Best practices for network and enterprise cybersecurity as put forth by the collaborators include rolebased access control, allowlisting, data tokenization, and privileged access management. Utilizing these tenets, theft of credit card and transaction data is prevented. Allowlisting is the practice of listing entities that are granted access to a certain system or protocol. When an allowlist is used, all entities are denied access, except those included in the allowlist.

The PMS reference design enables and enforces role-based access control to define exactly who or what will be allowed to make connections within the PMS reference design. ZTA utilizing dynamic provisioning specifies permitted connections and data transactions. Privileged access management defines, enforces, and monitors the privileges for each user, machine, and data transaction.

The NCCoE PMS reference design includes three types of authorized users: hotel guests, hotel staff, and system administrators. Each user has defined access privileges in the simulated hotel environment. Guests can connect to the internet via the Wi-Fi. Staff are allowed authorized access for only the systems and applications needed to perform their work and are not allowed to make any connections outside the scope of their role. System administrators are granted back-end access, but only for the systems and applications they provision, maintain, and troubleshoot.

#### 1.2.1 PMS Reference Design

Within the constructed PMS reference design in this guide, registered hotel guests can connect to the internet via the guest Wi-Fi. Registered hotel guests attempting to connect to the internet will initially be challenged to provide a response, which is validated against information from their reservation. Once validated, the guest is able to connect to the internet and any public-facing hotel websites or guest service portals but is not able to discover other devices using the guest Wi-Fi, which could also be used to support hotel operations and guest-facing Internet of Things (IoT) devices.

The PMS reference design represented in the example implementation constantly changes the internet protocol (IP) addresses of devices, enabling a moving target defense tactic that is transparent to the staff. They can reach the systems that allow them to perform their work while the defense tactic hinders lateral movement of attackers, who will be challenged to achieve and maintain persistent access.

In developing the hotel PMS reference design, some of the tenets of zero trust were adopted. This resulted in secure, authorized, dynamic access to data or resources on a per-transaction, per-user, and per-system basis, based on factors such as device health and hygiene and other cybersecurity considerations.

The PMS reference design includes a network protection device and an access control platform to support privileged access management. Adding a wireless protection and visibility platform enables allowlisting, network segmentation, and role-based authentication to the Wi-Fi. All access to resources is granted on a per-connection basis, based on a security policy.

#### 1.2.2 Standards and Guidance

In developing the PMS reference design, we were influenced by standards and guidance from the following sources, which can also provide an organization with relevant standards and best practices:

Note: The titles of some of the documents below include the following acronyms: HTNG, which stands for Hospitality Technology Next Generation; EMV originally stood for Europay, Mastercard, and Visa, the three companies that created the standard; PCI, which stands for Payment Card Industry; and GDPR, which stands for General Data Protection Regulations

- HTNG: Secure Payments Framework for Hospitality, version 1.0, February 2013 [2]
- HTNG: Payment Tokenization Specification, February 21, 2018 3
- HTNG: Payment Systems & Data Security Specifications 2010B, October 22, 2010 [4]
- HTNG: EMV for the US Hospitality Industry, October 1, 2015 [5]
- PCI Security Standards Council: Understanding the Payment Card Industry Data Security Standard, version 3.2.1, May 2018 [6]
- HTNG: GDPR for Hospitality, June 1, 2019 [7]
- National Institute of Standards and Technology (NIST) Cybersecurity Framework, April 2018 [8]
- NIST Special Publication (SP) 800-53 Rev. 5, Security and Privacy Controls for Information Systems and Organizations, September 2020 [9]
- NIST SP 800-63-3, Digital Identity Guidelines, June 22, 2017 [10]
- NIST SP 800-181 Rev 1, Workforce Framework for Cybersecurity (NICE Framework), November 2020 [11]
- NIST Privacy Framework: A Tool for Improving Privacy Through Enterprise Risk Management, Version 1.0, January 16, 2020 [12]
- NIST SP 800-207, Zero Trust Architecture, August 2020 [13]
- Trustwave Holdings: 2019 Trustwave Global Security Report [14]

#### **1.3 Benefits**

The NCCoE's practice guide *Securing Property Management Systems* can help an organization:

- reduce the risk of a network intrusion compromising the PMS and preserve core operations if a breach occurs
- provide increased assurance for protecting hotel guest information
- ensure that only hotel staff with a business need are given access to the PMS
- increase overall PMS security situational awareness and limit exposure of the PMS to incidents in systems that interface with it
- avoid exploitations that decrease consumer confidence of the property owner, chain, or industry
- increase consumer confidence in the protection of sensitive consumer data

In the hospitality space, cost is a major driving factor for many enterprise decisions, so the example implementation documented in this guide is designed to be modular. The PMS reference design documented here offers opportunities for an organization to choose only those components of the implementation that fit its enterprise.

### 2 How to Use This Guide

This NIST Cybersecurity Practice Guide demonstrates a standards-based reference design and provides users with the information they need to replicate a more secure PMS. This reference design is modular and can be deployed in whole or in parts.

This guide contains three volumes:

- NIST SP 1800-27A: Executive Summary
- NIST SP 1800-27B: Approach, Architecture, and Security Characteristics—what we built and why (this document)
- NIST SP 1800-27C: How-To Guide-instructions for building the example implementation

Depending on your role in your organization, you might use this guide in different ways:

**Business decision makers, including chief security and technology officers,** will be interested in the *Executive Summary* (NIST SP 1800-27A), which describes the:

- challenges that enterprises face in making a PMS more secure and protective of privacy
- example implementation built at the NCCoE
- benefits of adopting the example implementation

**Technology or security program managers** who are concerned with how to identify, understand, assess, and mitigate risk will be interested in this part of the guide, NIST SP 1800-27B, which describes how the PMS reference design mitigates risk.

The following sections may be of interest to users of risk management and privacy frameworks:

- Section 3.4, Risk Assessment, describes the risk analysis performed.
- <u>Section 3.4.3</u>, Cybersecurity Control Map, maps the security characteristics of this example implementation to cybersecurity standards and best practices.
- <u>Section 6.2</u>, Privacy Protections of the Reference Design, describes how we used the NIST Privacy Framework Subcategories.

**Technical-savvy readers** who wish to implement the security offered in this document might benefit by sharing not only this document but also the *Executive Summary*, NIST SP 1800-27A, with leadership to push for resources needed to secure the PMS and reduce risk.

**Information technology (IT) professionals** who want to implement an approach like this will find the whole practice guide useful and will find the how-to portion of the guide, NIST SP 1800-27C, to have all the details that would allow replicating all or parts of the PMS environment built for this project. The how-to guide provides specific product installation, configuration, and integration instructions for implementing the example implementation—in this case, a functioning PMS environment.

This guide assumes that IT professionals have experience implementing security products within the enterprise. While we have used a suite of commercial products to address this challenge, this guide does not endorse these products. An organization can adopt this example implementation or one that adheres to these guidelines in whole, or this guide can be used as a starting point for tailoring and implementing parts of a more secure PMS. Your organization's security experts should identify the products that will best integrate with your existing tools and IT system infrastructure. The NCCoE encourages organizations to seek products that are congruent with applicable standards and best practices. Section 4-1, Architecture Description, lists the products in this project's PMS environment and maps them to the cybersecurity controls provided by this example implementation.

Acronyms used in figures are in the List of Acronyms appendix.

#### 2.1 Typographic Conventions

Typeface/ Symbol	Meaning	Example
Italics	file names and path names; references to documents that are not hyperlinks; new terms; and placeholders	For language use and style guidance, see the NCCoE Style Guide.
Bold	names of menus, options, com- mand buttons, and fields	Choose <b>File &gt; Edit.</b>
Monospace	command-line input, onscreen computer output, sample code examples, and status codes	Mkdir
Monospace Bold	command-line user input con- trasted with computer output	service sshd start
<u>blue text</u>	link to other parts of the docu- ment, a web URL, or an email address	All publications from NIST's NCCoE are available at <u>https://www.nccoe.nist.gov.</u>

The following table presents typographic conventions used in this volume.

## 3 Approach

This practice guide highlights the approach that the NCCoE used to develop the example implementation. The approach includes a risk assessment and analysis, logical design, example build development, testing, and security control mapping.

The NCCoE worked with hospitality organizations, such as the American Hotel & Lodging Association and HTNG, to identify the need for an example implementation that improves the security of connections to

and from the POS and PMS and other integrated services and components. These organizations, along with the Retail and Hospitality Information Sharing and Analysis Center, offered opportunities for the NCCoE to discuss this project and solicit input from stakeholders used to shape this effort.

In developing the example implementation, the NCCoE:

- met with hospitality entities and stakeholders such as hotel operators and managers to identify cybersecurity challenges with property management systems
- regularly interacted with members of the NCCoE Hospitality Community of Interest to discuss current cybersecurity trends and challenges
- received input from the collaborators participating in the project documented by this guide
  - The collaborators provided technologies to address the project's requirements and partnered in developing the PMS built for this project.
- implemented stronger security measures within and around the PMS through network segmentation, point-to-point encryption, data tokenization, and business-only usage restrictions
  - We considered including analytics and multifactor authentication but did not include these security measures in the PMS reference design.

#### **3.1 Audience**

This practice guide is intended for any hospitality stakeholder concerned about and/or responsible for securely implementing and mitigating risk in and around a PMS. This includes system owners; IT and cybersecurity engineers, specialists, and technicians; hoteliers; and cybersecurity vendors.

Cybersecurity specialists, in particular, may find this document useful for its focus on the following:

- preventing unauthorized access via role-based authentication
- protecting against unauthorized lateral movement and privilege escalation attacks
- preventing theft of credit card and transaction data via data tokenization
- allowing only identified entities access by providing access control enforcement
- increasing situational awareness by auditing, system activity logging, and reporting
- preventing unauthorized use of personal information

The technical components of this guide will appeal to those who are directly involved with or oversee the PMS and its connections.

#### 3.2 Scope

This project is focused on increasing cybersecurity and privacy of a PMS environment. This includes protecting the data moving between ancillary systems such as a POS, physical access control systems, and hotel guest Wi-Fi as well as data at rest within components of the PMS environment.

After an open call in the Federal Register [1] inviting vendors to become collaborators, the project was scoped to create a PMS reference design that offers the following:

- protection against loss of customer data
- cybersecurity situational awareness

• cybersecurity for ancillary systems such as hotel guest-facing Wi-Fi networks, hotel staff workstations, and electronic door locks

We considered the following areas and determined they are outside the scope of what we documented in this project:

- use of a cloud-based PMS
- point-of-sale terminals
- validation of compliance with the PCI Data Security Standard (DSS)
- key management techniques—while mentioned in this document in discussions of secure payment—were not in scope for the implemented architecture
- securing web servers and web applications
- mobile device security
- penetration testing and vulnerability assessments
- risk checks that relate the login history of users with their login locations as criteria for granting access to the requested system
- wireless access concerns for conference attendees, as well as other concerns that involve largescale testing

#### 3.3 Assumptions

This project is guided by the following assumptions:

- availability of skills—The organization has employees or contractors who can implement a security architecture around its property management system.
- uniqueness of lab environment—The example implementation was developed in a lab environment. It does not reflect the complexity of a production environment, and we did not use production deployment processes. Before production deployment, it should be confirmed that the example implementation capabilities meet the organization's architecture, reliability, and scalability requirements.

#### 3.4 Risk Assessment

For this project, Risk Management Framework Quick Start Guides [15] proved to be invaluable in providing a baseline to assess risks from which we developed the project and the security characteristics of the build. For a deeper dive into the application of a risk management framework, the NCCOE recommends following the guidance in the publicly available NIST SP 800-37 Revision 2, *Risk Management Framework for Information Systems and Organizations* [16].

NIST SP 800-30 Revision 1, *Guide for Conducting Risk Assessments*, states that risk is "a measure of the extent to which an entity is threatened by a potential circumstance or event, and typically a function of: (i) the adverse impacts that would arise if the circumstance or event occurs; and (ii) the likelihood of occurrence" [17]. The guide further defines risk assessment as "the process of identifying, estimating, and prioritizing risks to organizational operations (including mission, functions, image, reputation), organizational assets, individuals, other organizations, and the Nation, resulting from the operation of

an information system. Part of risk management incorporates threat and vulnerability analyses, and considers mitigations provided by security controls planned or in place."

#### 3.4.1 Threats

All organizations face external and internal threats. While not every threat can be eliminated, an architecture can be built to mitigate and/or reduce the potential realization of various threats. The PMS reference design mitigates threats related to unauthorized and elevated privileges, data exfiltration, configuration modification, data modification, and access to sensitive data. Any or all of these unmitigated threats could lead to fraud, which is one of the largest concerns in the hospitality industry.

#### 3.4.1.1 External Threats

One managed security service provider's annual global security report [14] shows that the hospitality industry has the second highest number of incidents being investigated by the provider. The same report notes that motivation or types of data targeted by malicious actors for hospitality organizations includes "credit card track data, financial/user credentials, proprietary information, and PII" [personally identifiable information].

Since 2014, a targeted technique labeled *DarkHotel hacking* [18] by security services leverages a hotel's Wi-Fi to selectively target and deliver malicious software to traveling executives. Further, identity theft and *doxing*—searching for and publishing private or identifying information about an individual on the internet, typically with malicious intent—are persistent threats within the hospitality industry.

#### 3.4.1.2 Internal Threats

Hotels also face internal threats, including misuse, inappropriate sharing or disclosure of personal information by employees with malicious intent, and accidental breaches. In fact, it is suggested that more than 50 percent of security incidents are initiated from current or former employees. Mitigating internal threats involves more than just physical concepts, such as locking doors; rather, the process needs to include cybersecurity concepts that help protect against insider threats and unauthorized lateral movement within the enterprise by hotel staff and hotel guests.

#### 3.4.2 Vulnerabilities

A vulnerability is a "weakness in an information system, system security procedures, internal controls, or implementation that could be exploited or triggered by a threat source" [19]. Among this project's goals is mitigating the ability of an actor to exploit vulnerabilities. Often, vulnerabilities are self-inflicted. For instance, organizations may:

- commit integration and configuration errors due to poor configuration management processes
- delay and/or not perform patching/updating regularly
- improperly deploy assets

#### 3.4.3 Cybersecurity Control Map

Visit <u>Appendix A</u> to see the security control mappings that have been identified for this project's PMS reference design. A Cybersecurity Framework Components Mapping table (<u>Table A-1</u>) shows the result

from examining all the NIST Cybersecurity Framework [8] Core Subcategories and picking the Subcategories supported as a desired outcome of the PMS environment. Each of the Cybersecurity Framework Subcategories shown in the table maps to PCI DSS [6], controls in NIST SP 800-53 rev 5 [9], and work roles in the NICE Cybersecurity Workforce Framework [11]. <u>Section 5</u> of this document reiterates the security control mappings and introduces zero trust as another method of analysis and planning.

#### 3.4.4 Privacy Control Map

Best practices for privacy protection include data minimization, transparency, and preference management. The *NIST Privacy Framework* Core [12] is a set of privacy protection activities, desired outcomes, and applicable references that are common across all sectors. The Core presents industry standards, guidelines, and practices in a manner that enables communicating privacy activities and outcomes across the organization from the executive level to the implementation/operations level. The Privacy Framework Core consists of five Functions—Identify-P, Govern-P, Control-P, Communicate-P, and Protect-P. When considered together, these Functions provide a high-level, strategic view of the life cycle of an organization's management of privacy risk arising from data processing. The Framework Core then identifies underlying key Categories and Subcategories—which are discrete outcomes—for each Function and provides example informative references such as existing standards, guidelines, and practices for each Subcategory.

Visit <u>Appendix B</u> to see privacy control mappings that we have identified for this project's PMS reference design. A Privacy Framework Mapping table (<u>Table B-1</u>) shows the result from examining all the *NIST Privacy Framework* Core [12] Subcategories and picking the Subcategories supported by components of the PMS reference design. This work was done after the collaboration team designed the PMS reference design. We include it to draw attention to NIST's Privacy Framework, a tool for improving privacy through enterprise risk management, to enable better privacy engineering practices that support privacy by design concepts and help organizations protect individuals' privacy.

We did not run a privacy risk assessment methodology during this project on any existing PMS as a first step that would enable an organization to subsequently identify a target privacy profile. <u>Table B-1</u> simply identifies the Subcategories addressed by the PMS reference design and indicates which PMS reference design component is responsible for covering the Subcategory's desired outcome.

### **4** Architecture

The PMS reference design built for this project demonstrates a typical hotel process for reservations, issuing room keys, and check-in and checkout credit card transactions. This section presents a high-level architecture showing the reference design implemented. It also introduces the use cases and process flows supported by the PMS reference design.

#### 4.1 Architecture Description

The NCCoE worked with project collaborators to develop a standards-based, commercially available reference design demonstrating the following capabilities:

- Data protection and encryption provides the capability to securely store PCI/PII data using additional data protection measures such as data encryption, limiting transmission of payment card data, secure data tokenization, and a secure data vault.
- System protection and authentication provides the capability to protect the functionality of the PMS, including the POS system and the reservation systems. This function also employs multifactor authentication and eliminates unauthorized access to data and services via dynamic authorization. This also includes making the access control enforcement, on a per connection basis, as granular as possible for internal and third-party users. Finally, it involves the use of network segmentation and controlling change across multiple system dimensions to increase uncertainty and complexity for attackers, thereby reducing their window of opportunity.
- **Logging** gives continuous and near real-time auditing and reporting of user activity, network events, and component interactions.

#### 4.1.1 High-Level Architecture

This section introduces the components, functions, and technologies implemented. The PMS reference design includes the components shown in Figure 4-1.

Figure 4-1 Secure PMS High-Level Architecture



Table 4-1 provides a listing of each of the components introduced in Figure 4-1 along with a description of its function in the reference design and the commercial technology implemented in the reference design.

Table 4-1 Components, Functions, Technologies

Component	Function	Technology Implemented
PMS	facilitates the reservations process, checks customers in and out, tracks charges, and reconciles billing	Solidres Note: This component was not provided by collabora- tor. It was purchased for use in this reference de- sign.
Network Protection Device	network protection appliance that works in concert with firewalls; pro- vides additional layer of protection against cyber attacks	CryptoniteNXT Secure Zone 2.9.1
Access Control Platform	secures connection and control mecha- nism to enterprise devices from author- ized users and authorized devices; also provides security perimeter monitor- ing, auditing, and logging activity	TDi ConsoleWorks 5.2-0u1
Privileged Access Management	provides real-time incident monitoring and detection, privilege escalation management, and reporting functions for the IT enterprise	Remediant SecureONE 18.06.3-ce
Wireless Protection and Visibility Platform	protects the hotel guest portion of the Wi-Fi by limiting guest access to only the internet and preventing hotel guest access to hotel back-end systems. Many hotel guest Wi-Fi systems are provided by service providers as stand- alone networks. An integrated Wi-Fi was included in this PMS reference de- sign to demonstrate control of lateral movement of hotel guests, allowing the integrated Wi-Fi to support the installa- tion of IoT devices in smart rooms or other systems requiring Wi-Fi connec- tivity.	Forescout CounterACT 8.1

Component	Function	Technology Implemented
Payment Solution Application	provides the token vault and tokeniza- tion along with multifactor authentica- tion	StrongKey Tellaro Appli- ance (formerly known as StrongAuth KeyAppliance (SAKA)
Physical Access Control Server	physical access control system, includ- ing door locks, room-key encoding, and management	Häfele Dialock 2.0
Firewall	provides exterior protection and seg- ments the enterprise	pfSense

### 4.2 Use Cases Supported by the Property Management System Reference Design

We designed and built the PMS reference design to support the following hotel use cases.

#### 4.2.1 Use Case 1: PMS Accepts Reservation

In Use Case 1, the PMS accepts a reservation, reconciles the bill, and closes out the reservation while never exposing any data to unauthorized access. Further, the reservation data is editable in a secure manner. In this PMS reference design, all reservations are manually entered directly into the PMS and not supplied by an external CRS.

#### 4.2.2 Use Case 2: Authorized User Access

In Use Case 2, only authorized users can connect to their authorized devices. They are not able to gain access to devices that might enable them to escalate their privileges within the PMS reference design or conduct any unauthorized lateral movements.

The access control platform in the PMS reference design allows users to connect only to the systems for which they are authorized based on their role as a hotel guest, hotel staff, or system administrator. The action of inputting or modifying a reservation requires an authorized hotel staff user to authenticate to gain access to the PMS.

#### 4.2.3 Use Case 3: Secure Credit Card Transaction

In Use Case 3, a credit card transaction is securely conducted. The hotel guest credit card transaction is tokenized before introduction to the PMS.

Credit card data is consumed only by the payment solution application (PSA) and is immediately tokenized. The PSA function to validate the guest credit card data with a third-party payment processor is not included in the PMS reference design. The validated credit card data token is sent from the PSA to

the PMS. The token is used again at checkout when the bill is paid, with only the token sent from the PMS to the PSA.

#### 4.2.4 Use Case 4: Secure Interaction of Ancillary Hotel System with PMS

In Use Case 4, the PMS securely interacts with a physical access control system, specifically a door lock and room-key encoder.

The physical access control server is a door lock/room-key system that requires connectivity to the PMS. To encode a room key at check-in, an authorized staffer accesses the PMS to identify the assigned guest room number and provides only the room number to the physical access control server (PACS) to encode a unique room key. In this process, the authorized hotel staff user authenticates to the PACS and simply inputs a room number. No guest PII is moved from the PMS to the PACS during key creation.

#### 4.3 Process Flows

The following process flows show the sequence of events taking place for various hospitality functions in the enterprise.

#### 4.3.1 Authorized Employee Access

Figure 4-2 shows the process flow for an authorized hotel staff user connecting to only the systems for which they are authorized. The hotel staff user will be challenged by the access control platform and will be required to present whatever credentials are required by policy; further, they will be granted only minimal access based upon their role. The process flow in Figure 4-2 is described below.

- 1. From a device or terminal, an authorized hotel staff user attempts to log in via the access control platform. All login attempts are directed to the access control platform and logged.
- 2. The hotel staff user who presents valid authentication credentials is granted access to only the system(s) they are allowed based upon their role.
- 3. The network protection device monitors their activity and maintain logs via the privileged access management system.
- 4. Any suspicious behavior is noted, logged, and acted on according to policy.
- 5. Logs are collected by the privileged access management solution.

#### Figure 4-2 Staff Process Flow



#### 4.3.2 Secure Credit Card Transaction

Figure 4-3 shows the process flow for a credit card transaction. The reference design adheres to guidance from the Secure Payments Framework [2]. The Secure Payments Framework is based on the concept that raw payment card data is not stored, processed, or transmitted by any hotel system within the control of the hotel company. The PMS reference design replaces raw payment card data with tokens. These tokens are useless to malicious actors. This approach is also aligned with PCI-DSS best practices.

The transaction is protected by the payment solution application via tokenization. The token alone is ineffective as only the payment solution

# The technology used in this build can support HTNG's Secure Payment Framework [2]:

- Encrypt cardholder data regardless of where transaction occurs (card present/card not present)
- Distribute Terminal Keys as part of its management of the Derived Unique Key Per Transaction (DUKPT)
- In one device address all the precursor processes as well as the secure storage and processing of credit card data endto-end

application can decrypt it and associate a credit card with charges. This transaction flow assumes that the payment card data was ingested via an on-property customer-facing card reader, on-property POS, a kiosk, the property website, or was collected from a third-party entity. That payment card data is tokenized at the edge of the PMS environment via the tokenization appliance before it hits the PMS.

The process of Figure 4-3 is described below.

- 1. The payment solution application collects the credit card information.
- 2. The payment solution application secures credit card information via a secure vault.
- 3. The payment solution application validates with a third-party payment processor.

- 4. The payment solution application issues a token.
- 5. Charges/bill are reconciled via the token from the PMS through the payment solution application back to the third-party payment processor when the guest checks out.

Figure 4-3 Secure Credit Card Process Flow



#### 4.3.3 Secure Interaction of Ancillary Hotel System (with PMS)

Figure 4-4 shows the process flow for the secure interaction of an ancillary system with the PMS. The following demonstrates how a door lock/room-key system is used in this example implementation.

- 1. An authorized hotel staff user connects to the PMS.
- 2. The physical access server validates the room-key request against a reservation in the PMS.
- 3. The room key is created and delivered.
- 4. All activity is logged and sent to the privileged access management system.

Figure 4-4 Secure Interaction of Ancillary System with PMS Process Flow



#### 4.3.4 Hotel Guest Internet Access via Hotel Guest Wi-Fi

Figure 4-5 shows the process flow for a guest accessing the internet via the hotel's guest Wi-Fi, showing how the:

- 1. Hotel guest attempts to connect to the internet via the guest Wi-Fi
- 2. Hotel guest is challenged
- 3. Hotel guest responds with temporary credentials they have been provided, corresponding to their reservation
- 4. Wireless protection and visibility platform validates with the PMS, and the hotel guest is provided internet access
- 5. Hotel guest is provided only access to the internet (is forbidden to move laterally) and any external-facing enterprise hospitality systems; all activity, including surfing and web activity, is logged and sent to the privileged access management system

Figure 4-5 Guest Internet Access Via Guest Wi-Fi Process Flow



# **5** Security Characteristic Analysis

The purpose of the security characteristic evaluation is to understand the extent to which the project meets its objective of demonstrating improved cybersecurity of a PMS.

#### 5.1 Analysis Assumptions and Limitations

The security characteristic analysis has the following limitations:

- The analysis is not a comprehensive test of individual security components, nor is it a red-team exercise involving adversarial emulation.
- The analysis cannot identify all weaknesses.
- The analysis does not include the lab infrastructure on which the project is built. The lab infrastructure undergoes regular patching and is in compliance with information security requirements per Federal law, including externally hosted systems that support NIST.

### 5.2 Analysis of the Reference Design's Support for Cybersecurity Framework Subcategories

The NIST Cybersecurity Framework Subcategories are a basis for organizing our analysis and allow us to systematically consider how well the reference design supports its intended security characteristics in terms of the specific Subcategories of the Cybersecurity Framework. This analysis enables an understanding of how the example implementation achieved the goals of the design when compared against a standardized framework.

The Cybersecurity Framework includes Functions, Categories, and Subcategories that define the capabilities and processes needed to implement a cybersecurity program. In <u>Table A-1</u>, the NCCoE has identified the Subcategories that are desirable to implement when deploying the example implementation.

This section identifies the security benefits provided by each component of the example implementation and how those components support specific cybersecurity activities as specified in terms of Cybersecurity Framework Subcategories.

# 5.2.1 ID.AM-1: Physical devices and systems within the organization are inventoried

The network protection device, the CryptoniteNXT Secure Zone 2.9.1, has the capability to inventory devices and systems that are part of or attached to the PMS reference design and update the inventory in near real time.

# 5.2.2 ID.AM-2: Software platforms and applications within the organization are inventoried

The network protection device, the CryptoniteNXT Secure Zone 2.9.1, has the capability to inventory platforms and applications that are part of or attached to the PMS reference design and update the inventory in near real time.

# 5.2.3 PR.AC-1: Identities and credentials are issued, managed, verified, revoked, audited, proofed and bound to credentials, and asserted in interactions for authorized devices, users, and processes

The access control platform, TDi ConsoleWorks 5.2-0u1, manages credentials and identities.

# 5.2.4 PR.AC-6: Identities are proofed and bound to credentials and asserted in interactions

The access control platform, TDi ConsoleWorks 5.2-0u1, challenges and verifies all credentials presented in the PMS reference design. The credential could be tied to a user, a system, an application, or a trusted third-party entity.

#### 5.2.5 PR.AC-3: Remote access is managed

Through a combination of the TDi ConsoleWorks 5.2-Ou1 access control platform and the Forescout CounterACT 8.1 wireless protection and visibility platform, all enterprise remote access activity is monitored, logged, and managed.

# 5.2.6 PR.AC-4: Access permissions and authorizations are managed, incorporating the principles of least privilege and separation of duties

The access control platform, TDi ConsoleWorks 5.2-0u1, and network protection device, CryptoniteNXT Secure Zone 2.9.1, work in combination to limit access in the least allowable fashion to only those

authorized entities, users, systems, transactions, and platforms. Connections that are authorized are given the least level of privilege as feasible.

#### 5.2.7 PR.AC-7: Users, devices, and other assets are authenticated (e.g., singlefactor, multifactor) commensurate with the risk of the transaction (e.g., individuals' security and privacy risks and other organizational risks)

Authentication that is commensurate with the risk of the transaction is an intrinsic part of the example implementation. Transactions/users/systems/applications are authenticated based upon the level of risk. Based upon configured policies, the access control platform, TDi ConsoleWorks 5.2-0u1, determines what level of authentication is required for a particular request as determined by the risk level associated.

#### 5.2.8 PR.DS-1: Data at rest is protected

The payment solution appliance, the StrongKey Key Appliance, tokenizes credit card data within the StrongKey vault to protect data at rest. Only tokens are transmitted through the PMS reference design, which protects the data in transit.

#### 5.2.9 PR.DS-2: Data in transit is protected

The payment solution appliance, the StrongKey Key Appliance, tokenizes credit card data within the StrongKey vault to protect data at rest. Only tokens are transmitted through the PMS reference design, which protects the data in transit.

#### 5.2.10 PR.IP-3: Configuration change control processes are in place

The network protection device, CryptoniteNXT Secure Zone 2.9.1, has the capability to control, log, and manage changes and updates to devices and systems in the PMS reference design.

#### 5.2.11 PR.PT-4: Communications and control networks are protected

The network protection device, CryptoniteNXT Secure Zone 2.9.1, monitors and protects the PMS reference design network and the devices connected to it.

# 5.2.12 DE.CM-1: The network is monitored to detect potential cybersecurity events

The reference designs support monitoring network activity. Event log information is reported and correlated by the privileged access management tool, Remediant SecureONE 18.06.3-ce.

# 5.2.13 DE.CM-3: Personnel activity is monitored to detect potential cybersecurity events

The reference design support monitoring personnel activity. Event log information is reported and correlated by the privileged access management tool, Remediant SecureONE 18.06.3-ce.

# 5.2.14 DE.CM-7: Monitoring for unauthorized personnel, connections, devices, and software is performed

The reference design support monitoring network and personnel activity. Event log information is reported and correlated by the privileged access management tool, Remediant SecureONE 18.06.3-ce. This also includes connections and attempted connections by unauthorized devices, users, and systems.

#### 5.2.15 DE.DP-4: Event detection information is communicated

The privileged access management tool, Remediant SecureONE 18.06.3-ce, logs all incidents and can be configured to report out as required by the enterprise.

#### 5.3 Zero Trust

Zero trust is a cybersecurity strategy that focuses on moving network defenses from wide, static network perimeters to focusing more narrowly on dynamic and risk-based access control to enterprise resources, regardless of where they are located.

Zero trust provides a collection of concepts and ideas designed to minimize uncertainty in enforcing accurate, least privilege per-request access decisions in information systems and services in the face of a network viewed as compromised.

#### 5.3.1 Zero Trust Tenets

This project is also designed to show a PMS reference design with an architecture that adheres to tenets of zero trust. Conventional network security has focused on perimeter defenses. Once inside the network perimeter, users are "trusted" and often given broad access to many corporate resources. But malicious actors can come from inside or outside the network, and several high-profile cyber attacks in recent years have undermined the case for the perimeter-based model. Moreover, the perimeter is becoming less relevant due to several factors, including the growth of cloud computing, mobility, and changes in the modern workforce.

A zero trust architecture is designed and deployed with adherence to the zero trust tenets. Figure 5-1 identifies zero trust tenets.

#### **Figure 5-1 Tenets of Zero Trust**



These tenets are the ideal goal, though it must be acknowledged that not all tenets may be fully implemented in their purest form for a given strategy. This publication's strategy to secure a property management system does connect with each of the zero trust tenets. Table 5-1 shows zero trust tenets associated with components in the PMS reference design and Cybersecurity Framework Subcategories.

Table 5-1 Zero Trust Tenets/Components/Cybersecurity Framework Subcategories

Zero Trust Tenet	PMS Reference De- sign Component	Cybersecurity Framework Subcategories
All data sources and computing services are considered resources.	CryptoniteNXT Secure Zone 2.9.1	<b>ID.AM-1</b> Physical devices and systems within the organization are inventoried.
		<b>ID.AM-2</b> Software platforms and applications within the organization are inventoried.
All communication is secured	CryptoniteNXT Secure Zone 2.9.1	<b>PR.AC-5</b> Network integrity is protected.
regardless of network location; network location does not imply trust.	StrongKey's vault	PR.DS-1 Data at rest is protected.
		<b>PR.DS-2</b> Data in transit is protected.
		<b>PR.PT-4</b> Communications and control networks are protected.
Access to individual enterprise resources is granted on a per-session basis; trust in the requester is evaluated before the access is granted.	TDi ConsoleWorks 5.2- 0u1	<b>PR.AC-1</b> Identities and credentials are issued, managed, verified, revoked, and audited for authorized devices, users, and processes.
		<b>PR.PT-3</b> The principle of least functionality is incorporated by configuring systems to provide only essential capabilities.

Zero Trust Tenet	PMS Reference De- sign Component	Cybersecurity Framework Subcategories
Access to resources is determined by dynamic policy, including the observable state of client identity, application, and the requesting asset, and may include other behavioral	TDi ConsoleWorks 5.2- 0u1	<b>PR.AC-4</b> Access permissions and authentications are managed, incorporating the principles of least privilege and separation of duties.
attributes.		<b>PR.AC-6</b> Identities are proofed and bound to credentials and asserted in interactions.
		<b>DE.CM-3</b> Personnel activity is monitored to detect potential cybersecurity events.
The enterprise ensures that all	No component was	PR.IP-1 A baseline configuration
owned and associated devices are in	included in the PMS	of information
the most secure state possible and	reference design to	technology/industrial control
monitors devices to ensure that they	ensure that devices	systems is created and
remain in the most secure state	are in the most secure	maintained incorporating
possible.	state.	security principles (e.g., concept of least functionality).
All resources' authentication and	Remediant SecureONE	PR.AC-1 Identities and
authorization are dynamic and	18.06.3-ce	credentials are issued, managed,
strictly enforced before access is allowed; this is a constant cycle of access, scanning and assessing	CryptoniteNXT Secure Zone 2.9.1	verified, revoked, and audited for authorized devices, users, and processes.
threats, adapting, and continually reevaluating trust in ongoing communications.	Forescout CounterACT 8.1	<b>PR.AC-3</b> Remote access is managed.
		<b>PR.AC-4</b> Access permissions and authentications are managed, incorporating the principles of least privilege and separation of duties.
		<b>PR.DS-5</b> Protections against data leaks are implemented.
		<b>PR.IP-3</b> Configuration change control processes are in place.

Zero Trust Tenet	PMS Reference De- sign Component	Cybersecurity Framework Subcategories
		<b>DE.CM-7</b> Monitoring for unauthorized personnel, connections, devices, and software is performed.
The enterprise collects as much information as possible about the current state of the network infrastructure and communications and uses it to improve its security posture.	Remediant SecureONE 18.06.3-ce	<ul> <li>DE.AE-2 Detected events are analyzed to understand attack targets and methods.</li> <li>DE.CM-1 The network is monitored to detect potential cybersecurity events.</li> <li>DE.DP-4 Event detection information is communicated.</li> </ul>

### 5.3.2 Components of Zero Trust

A zero trust architecture is an enterprise cybersecurity architecture that is based on zero trust principles and designed to prevent data breaches and limit internal lateral movement.

Figure 5-2 illustrates at a high level the components that compose a typical ZTA implementation.





Table 5-2 maps PMS reference design components (originally identified in Table 4-1) to components of ZTA as described in NIST SP 800-207, *Zero Trust Architecture*.

Table 5-2 Zero Trust Component and PMS Reference Design Component Mapping

PMS Reference Design Component	Zero Trust Component
pfSense Firewall	Endpoint Security
TDi ConsoleWorks	Identity and Access Management (IDAM)
Remediant SecureOne	Security Analytics
Data encryption at rest (in StrongKey StrongAuth KeyAppliance and Solidres PMS) and in transit	Data Security
CryptoniteNXT Administration Control Center (ACC)	Policy Engine
Domain users, system administrators with access permission to the CryptoniteNXT administrator workstation	Policy Administrators
Any device within the CryptoniteNXT Secure Zone, including PMS and other security components	Policy Enforcement Points
PMS Reference Design Component	Zero Trust Component
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Users (hotel guests, hotel staff, and system administrators)	Subjects
Workstation	Asset
Solidres PMS	Enterprise Resource
Data in Solidres PMS	Enterprise Resource
StrongKey StrongAuth KeyAppliance vault	Enterprise Resource
Credit card data in StrongKey StrongAuth KeyAppliance vault	Enterprise Resource

# **6** Privacy Characteristic Analysis

The purpose of a privacy characteristic evaluation is to understand the extent to which a project meets its objective of demonstrating improved privacy protection for a PMS.

#### 6.1 Analysis Assumptions and Limitations

For this project, the privacy characteristic evaluation has the following limitations:

- The analysis is not a comprehensive test of individual privacy components, nor does it include completion of a privacy risk assessment methodology.
- The analysis cannot identify all weaknesses.

## 6.2 Privacy Protections of the Reference Design

The *NIST Privacy Framework* Core Subcategories are a basis to identify privacy characteristics that are supported by our PMS reference design. The PMS reference design architecture was designed before the *NIST Privacy Framework* [12] was developed. This section is included to draw attention to the Privacy Framework and to highlight that protecting an individual's privacy could become a core value for PMS reference designs through more thorough use of the Privacy Framework.

See the Privacy Framework Mapping, <u>Table B-1</u>, in Appendix B for the technical privacy characteristics identified as being satisfied by this PMS reference design.

# 7 Functional Evaluation

#### 7.1 Test Cases

This section includes the test cases necessary to conduct the functional evaluation of the PMS example implementation. Refer to <u>Section 4</u> for descriptions of the tested example implementation.

Each test case consists of multiple fields that collectively identify the goal of the test, the specifics required to implement the test, and how to assess the results of the test. Table 7-1 describes each field in the test case.

Test Case Field	Description
requirement tested	identifies the requirement to be tested and guides the definition of the remainder of the test case fields; specifies the capability to be evaluated
description	describes the objective of the test case
associated Cybersecurity Frame- work Subcategories	lists the Cybersecurity Framework Subcategories addressed by the test case
sub test cases	In some cases, one or more tests may be part of a larger use case or functionality.
preconditions	identifies the starting state of the test case. Preconditions indi- cate various starting state items, such as a specific capability con- figuration required or specific protocol and content.
procedure	lists the step-by-step actions required to implement the test case; a procedure may consist of a single sequence of steps or multiple sequences of steps (with delineation) to indicate varia- tions in the test procedure
expected results	lists the expected results for each variation in the test procedure
actual results	records the observed results
disposition	indicates if the test passed or failed

#### 7.1.1 PMS Use Case Requirements

Table 7-2 identifies the PMS functional analysis requirements that are addressed in the associated requirements and test cases and mapped to the build components.

Table 7-2 Functional Analysis	Requirements
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Capability Requirement (CR) ID	Parent Requirement	Subrequirement	Test Case	Component
CR 1	guest reservation		PMS-04	property management system

Capability Requirement (CR) ID	Parent Requirement	Subrequirement	Test Case	Component
CR 1.a		room key provisioned	PMS-05	physical access control server
CR 2	authorized hotel staff user can log in		PMS-01	access control platform
CR 2.a		cannot move laterally unless authorized to do so	PMS-03a, PMS-03b	access control platform
CR 2.b		have access only to data they are author- ized to access	PMS- 03b, PMS-03c	network protection device
CR 2.c		users with par- tial/compromised cre- dentials are blocked	PMS-02	access control platform
CR 3	secure credit card transaction		PMS-07a	payment solution appliance
CR 3.a		Credit card data was tokenized.	PMS-07a	payment solution appliance
CR 3.b		Eavesdropper cannot see credit card data.	PMS-07b	payment solution appliance
CR 4	Wi-Fi hotel guest connectivity/login		PMS-06a	wireless protection and visibility platform
CR 4.a		Hotel guest cannot access enterprise systems.	PMS-06b	wireless protection and visibility platform
CR 5	Authorized device can connect/ unauthorized device cannot connect.		PMS-08, PMS-09	privileged access management

## 7.1.2 Test Case PMS-01 (Authorized Hotel Staff User Can Log In)

Table 7-3 contains test case requirements, an associated test case, and descriptions of the test scenario for an authorized user logging in to the system(s) for which they are authorized.

Table 7-3 Authorized User Can Log In

Test Case Field	Description
requirement tested	(CR 2) system login capability for authorized users
description	Verify that a new authorized hotel staff user is provided creden- tials and can log in to enterprise systems for which they are au- thorized.
associated Cybersecurity Frame- work Subcategories	PR.AC-1, PR.AC-4, PR.PT-3
sub test cases	N/A
preconditions	PMS and room-key systems up and running
procedure	Log in to end user workstation/front desk, open TDi in browser, authenticate, open connection to host in console.
expected results	Hotel staff user can log in to the PMS with their issued creden- tials.
actual results	Hotel staff user can log in to PMS through TDi console. (Other tested machines include front desktop, management work-station.)
disposition	pass

## 7.1.3 Test Case PMS-02 (PMS Authentication)

Table 7-4 contains test case requirements, associated test case, and descriptions of the test scenario for validating the PMS authentication mechanism and validating that the mechanism protects against compromised accounts/credentials.

#### **Table 7-4 PMS Authentication**

Test Case Field	Description
requirement tested	(CR 2.c) hotel staff users blocked with partial/compromised cre- dentials
description	Validate that authentication to the PMS works as planned, e.g., multifactor authentication, biometric.
associated Cybersecurity Frame- work Subcategories	DE.AE-2, DE.CM-1, DE.CM-7
sub test cases	If a hotel staff user has only a partial credential or a compro- mised credential, they cannot access the PMS.
preconditions	PMS configured and running properly
procedure	Log in to end user workstation/front desk, open TDi in browser, authenticate, open connection to Solidres's admin console. Trig- ger password policy by trying to log in Solidres's admin side 10 times.
expected results	Solidres admin console can be accessed successfully. Locked ac- count cannot be accessed.
actual results	Solidres admin console can be accessed successfully. (Multifactor is enabled and can be used if the user provisions a tokenization device.) Enabled brute force plug-in in PMS that blocks IP for one day when attempting to log in past 10 attempts. The account was locked and could not be accessed after locking.
disposition	pass

# 7.1.4 Test Case PMS-03 (Authorized Users Can Access Only Systems and Data They Are Authorized for Test Cases)

The following three test cases validate users being granted access only to that for which they are authorized.

#### 7.1.4.1 Test Case PMS-03a (Hotel Staff Users Cannot Move Laterally from the PMS Unless Authorized to Do So)

Table 7-5 contains test case requirements, associated test case, and descriptions of the test scenario for preventing lateral movement.

Table 7-5 No	<b>Unauthorized</b>	Lateral	Movement
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Test Case Field	Description
requirement tested	(CR 2.a) cannot move laterally unless authorized to do so
description	Verify that an authorized hotel staff user cannot go outside their boundary.
associated Cybersecurity Frame- work Subcategories	PR.AC-5, PR.PT-3, DE.CM-3
sub test cases	If they are authorized to access only the PMS, they cannot move laterally to another enterprise system from the PMS.
preconditions	PMS configured and running properly
procedure	attempted to connect to another system with an account that was authorized only for the PMS
expected results	access denied
actual results	access denied
disposition	pass

#### 7.1.4.2 Test Case PMS-03b (Prevent Unauthorized Function)

Table 7-6 contains test case requirements, associated test case, and descriptions of the test scenario for preventing a hotel staff user from performing a function for which they are not authorized.

#### **Table 7-6 Prevent Unauthorized Function**

Test Case Field	Description
requirement tested	(CR 2.a, CR 2.b) cannot move laterally unless authorized to do so; have access only to data for which they are authorized
description	Verify that an authorized hotel staff user cannot go outside their boundary.
associated Cybersecurity Frame- work Subcategories	PR.PT-3, DE.CM-3
sub test cases	The user cannot perform a function for which they are not au- thorized, e.g., create a master room key.
preconditions	PMS configured and running properly; Häfele back-end server configured and running properly
procedure	Front desk user created with no write or delete access. Verify the access controls of the Häfele back-end server.
expected results	Häfele permissions do not allow user to create a master room key for all of the created rooms in the back-end server.
actual results	Master key could not be created when the lowest level of privi- lege was given. The user was not able to add an authorization to create or save MIFARE credentials.
disposition	pass

#### 7.1.4.3 Test Case PMS-03c (Only Authorized Data)

Table 7-7 contains test case requirements, associated test case, and descriptions of the test scenario for ensuring that hotel staff users have access only to data for which they are authorized.

#### Table 7-7 Only Authorized Data

Test Case Field	Description
requirement tested	(CR 2.b) have access only to data for which they are authorized
description	Verify that an authorized hotel staff user cannot go outside their boundary.
associated Cybersecurity Frame- work Subcategories	PR.AC-5, PR.DS-2, PR.DS-5, PR.PT-3, DE.CM-3
sub test cases	Verify that the hotel staff user has access to only the data set(s) for which they are authorized; further, that they can only down- load data they are authorized to download, and edit data that they are authorized to edit.
preconditions	PMS configured and running properly
procedure	created a hotel staff user account that was giving the permission of a "site sponsor." This user account could see only site-specific information, not including guest reservations. After logging in to the account, it was verified that the specified permissions were valid and that the account could not navigate to sensitive data.
expected results	Solidres Access Control List (ACL) controls are functioning, and registered guests or sponsors should not be able to access or view sensitive customer data.
actual results	ACL manages view of permissions of the logged-in users. Users could only view data they were authorized to view within the Solidres PMS.
disposition	pass

## 7.1.5 Test Case PMS-04 (Guest Reservation Editable)

Table 7-8 contains test case requirements, associated test case, and descriptions of the test scenario for entering a reservation and editing the reservation.

#### **Table 7-8 Guest Reservation Editable**

Test Case Field	Description
requirement tested	(CR 1) creating a guest reservation and having the ability of only an authorized user to edit the reservation
description	Enter a guest reservation into the PMS. Verify that it is in the PMS and that it is retrievable and editable.
associated Cybersecurity Frame- work Subcategories	N/A
sub test cases	N/A
preconditions	PMS up and running properly
procedure	Navigate to Solidres guest registration from guest machine, and book a room.
expected results	reservation record in the PMS
actual results	The test registration is bookable/retrievable from web interface of Solidres.
disposition	pass

## 7.1.6 Test Case PMS-05 (Room-Key Provisioning)

Table 7-9 contains test case requirements, associated test case, and descriptions of the test scenario for provisioning a room key.

Table 7-9 Provisioning Room Key

Test Case Field	Description
requirement tested	(CR 1) room key provisioned
	From the reservation in the PMS, verify that a room key is provi- sioned for the hotel guest.

Test Case Field	Description
associated Cybersecurity Framework Subcategories	N/A
sub test cases	Verify the processing of provisioning, writing, reading.
preconditions	Rooms are defined in Häfele, and PMS is running.
	Provision a key through the PMS in conjunction with Häfele's back- end server. The provision process includes assigning a key in the PMS, writing a key card with the Häfele back-end server, and mak- ing sure that the assigned key-card room number and guest-regis- tered room number are the same.
expected results	Provisioned room key works.
actual results	Room keys were provisioned.
disposition	pass

#### 7.1.7 Test Case PMS-06 (Provisioning Guest Wi-Fi Access)

The following two test cases will validate provisioning hotel guest Wi-Fi access and that guests cannot access the restricted enterprise from the Wi-Fi.

#### 7.1.7.1 Test Case PMS-06a (Guests' Limited Wi-Fi Access)

Table 7-10 contains test case requirements, associated test case, and descriptions of the test scenario for preventing lateral movement.

Table 7-10 Guests	' Limited	Wi-Fi Access
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Test Case Field	Description
requirement tested	(CR 4) Wi-Fi hotel guest connectivity/login
description	Only registered hotel guests will be granted limited Wi-Fi access.
associated Cybersecurity Frame- work Subcategories	PR.AC-3, PR.IP-3, PR.PT-3, PR.PT-4, DE.CM-3

Test Case Field	Description
sub test cases	Verify that the hotel guest can access only authorized resources via the Wi-Fi, e.g., the internet and guest-facing resources such as activities reservations and room charges.
preconditions	PMS up and running properly; guest Wi-Fi up, running, and con- nected; hotel guest has provisioned Wi-Fi login
procedure	Attempt to connect a device to the guest Wi-Fi. When the login screen appears, enter the password created for the hotel guest as part of the reservation process to complete the login. Open a browser, and verify internet sites are accessi- ble.
expected results	Guest successfully logs in to Wi-Fi with issued login.
actual results	entered the Wi-Fi key and gained access to the internet
disposition	pass

#### 7.1.7.2 Test Case PMS-06b (Prevent Unauthorized Guest Lateral Movement via Wi-Fi)

Table 7-11 contains test case requirements, associated test case, and descriptions of the test scenario for preventing a guest from accessing any restricted back-end systems.

Test Case Field	Description
requirement tested	(CR 4.a) Hotel guest cannot access enterprise systems.
description	Only registered hotel guests are granted limited Wi-Fi access.
associated Cybersecurity Frame- work Subcategories	PR.AC-3, PR.PT-4, DE.CM-3

Test Case Field	Description
sub test cases	Verify that the hotel guest via the Wi-Fi cannot jump to any en- terprise systems (e.g., PMS).
preconditions	PMS up and running properly; guest Wi-Fi up, running, and con- nected; hotel guest has provisioned Wi-Fi login
procedure	Once the hotel guest Wi-Fi is operating and internet access has been established, attempt to ping the IP addresses of the pro- tected hotel systems.
expected results	Hotel guest cannot access unauthorized resources when logged in to the guest Wi-Fi.
actual results	Hotel guest Wi-Fi range is blocked via NGINX ACL implementa- tion, which works with CounterACT protections.
disposition	pass

#### 7.1.8 Test Case PMS-07 (Secure Credit Card Transaction)

The following two test cases validate secure credit card transactions.

#### 7.1.8.1 Test Case PMS-07a (Tokenized Credit Card Data)

Table 7-12 contains test case requirements, associated test case, and descriptions of the test scenario for tokenizing credit card data for a credit card transaction.

Table 7-12 Tokenized Credit Card Data

Test Case Field	Description
requirement tested	(CR 3.a) Credit card data was tokenized.
description	Conduct a credit card transaction, and verify that the credit card data was tokenized and that the transaction went through.
associated Cybersecurity Frame- work Subcategories	N/A

Test Case Field	Description
sub test cases	Validate that credit card data was tokenized; validate that addi- tional charges can be recorded using the token; validate that the token can be reconciled for payment; validate that the token en- crypts and/or otherwise obfuscates credit card data; validate that a "captured" or copied or exfiltrated token is worthless.
preconditions	PMS is up and running properly.
procedure	Log on to hotel staff user workstation/front desk, open TDi in browser, authenticate, open connection to Solidres PMS, navi- gate to reservations, click the test reservation, validate credit card information was tokenized. Open terminal in TDi Virtual Network Computing (VNC) session, authenticate to MySQL Server, view table entries for reservation, validate credit card in- formation was tokenized (database, PMS, over the wire).
expected results	valid credit card transaction. The credit card information can be seen when accessing the guest reservation in the PMS.
actual results	Tokenized credit card information is stored in Solidres and is reading for processing through the offline plug-in. PII for credit card charges is tokenized. Data in database is stored as a token. (The stripe plug-in required a credit card for charges, and the of- fline plug-in simulates the "on-site payment" solution that charges the cards after the fact or forwards them to a third party securely.)
disposition	pass

## 7.1.8.2 Test Case PMS-07b (Verify that Credit Card Data Is Hidden)

Table 7-13 contains test case requirements, associated test case, and descriptions of the test scenario for verifying that credit card data is hidden.

#### Table 7-13 Verify that Credit Card Data Is Hidden

Test Case Field	Description
requirement tested	(CR 3.b) Eavesdropper cannot see credit card data.
description	Conduct a credit card transaction, and verify that the credit card data was tokenized and that the transaction went through.
associated Cybersecurity Frame- work Subcategories	PR.AC-5, PR.DS-2, PR.DS-5
sub test cases	Verify that an eavesdropper cannot see any credit card data.
preconditions	PMS is up and running properly.
procedure	Verify that a credit card transaction cannot be determined from captured Wireshark traffic.
expected results	No credit card data is visible to an eavesdropper.
actual results	Wireshark shows Transport Layer Security encrypted traffic where payment information is tokenized, and user is submitting reservation through guest system. Wireshark was run on the host machine that also housed the PMS server.
disposition	pass

#### 7.1.9 Test Case PMS-08 (Authorized Device Provisioning)

Table 7-14 contains test case requirements, associated test case, and descriptions of the test scenario for allowing an authorized device to connect to the enterprise.

Test Case Field	Description
•	(CR 5) Authorized device can connect/unauthorized device cannot connect.
•	Verify that an authorized device can be provisioned and added/connected to the enterprise.

Test Case Field	Description
associated Cybersecurity Framework Subcategories	ID.AM-1, ID.AM-2, PR.AC-1, PR.IP-3
sub test cases	N/A
	Various technology is up and running; security mechanisms are in place.
procedure	Connect an authorized device with valid credentials.
expected results	Device will connect to the enterprise.
actual results	Authorized device could connect.
disposition	pass

## 7.1.10 Test Case PMS-09 (Prevent Unauthorized Device from Connecting)

Table 7-15 contains test case requirements, associated test case, and descriptions of the test scenario for preventing an authorized device form connecting to the enterprise.

Table 7-15 Prevent Unauthorized	Device from Connecting
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Test Case Field	Description	
requirement tested	(CR 5) Authorized device can connect/unauthorized device cannot connect.	
description	Verify that an unknown/unauthorized system that appears on the enterprise cannot access the PMS or establish a connection to any enterprise system.	
associated Cybersecurity Framework Subcategories	PR.AC-5, PR.IP-3, DE.CM-1, DE.CM-7	
sub test cases	N/A	
preconditions	Cryptonite rules are configured to block unverified accounts.	
procedure	Add a machine to the secure enclave Virtual Local Area Network (VLAN) (simulates connecting to the network). From the con- nected machine, try to navigate to the PMS.	
expected results	Unverified machine is unable to navigate to PMS.	
actual results	Device was not allowed to connect.	
disposition	pass	

## 8 Future Build Considerations

The NCCoE is open to building future projects or drafting publications in the hospitality sector that not only push to secure a property management system but also reduce cybersecurity and privacy risk for any of the networked technologies being leveraged by the sector.

Exploration of how to mitigate risks could include focus on the use of personal mobile devices as room keys or as controllers of hotel-owned smart devices in a room. The NCCoE has a growing library of publications focused on mobile device security that may prove relevant to the hospitality sector. https://www.nccoe.nist.gov/projects/building-blocks/mobile-device-security

NIST has evolving focus on many areas aimed at reducing cybersecurity and privacy risk, so opportunities exist to frame adoption of more cybersecurity to reduce the risks from the expansion of the use of Internet of Things devices in the hospitality sector.

NIST's Cybersecurity for the Internet of Things program supports the development and application of standards, guidelines, and related tools to improve the cybersecurity of connected devices and the environments in which they are deployed. <u>https://www.nist.gov/programs-projects/nist-cybersecurity-iot-program</u>

Additionally, future efforts at the NCCoE might dive deeper to highlight the use of geo-velocity, geolocation, and rate limiting for connections as risk checks for authentication and analytics.

# Appendix A Mapping to Cybersecurity Framework

Table A-1 shows the National Institute of Standards and Technology (NIST) Cybersecurity Framework Subcategories that are addressed by the property management system (PMS) reference design built in this practice guide. The first three columns show the Cybersecurity Framework Functions, Categories, and Subcategories addressed by the PMS reference design. The next three columns show mappings from the Cybersecurity Framework Subcategories to specific components in the Payment Card Industry Data Security Standard (PCI DSS) v3.2.1; security and privacy controls in NIST Special Publication (SP) 800-53r5; and/or work roles in NIST SP 800-181r1, *National Initiative for Cybersecurity Education (NICE) Cybersecurity Workforce Framework* [11]. This table is included to help connect those with expertise in PCI DSS, NIST SP 800-53, and the NICE Framework with the risk being addressed in this PMS reference design. Examining existing work roles in the NICE Framework may help an organization identify if it has people who can perform tasks and apply the skills described for each work role on its deployment teams. Noting a discrete PCI requirement or NIST SP 800-53r5 control [9] may match areas of focus within an organization that securing a PMS reference design could help address.

NIST Cybersecurity Framework v1.1		Standards and Best Practices			
Func- tion	Category	Subcategory	PCI DSS v3.2.1	NIST SP 800- 53r5 Security and Privacy Con- trols [9]	NICE Framework 2017 Work Roles <u>[11]</u>
IDENTI	Asset Manage- ment (ID.AM): The data, per- sonnel, de- vices, systems, and facilities that enable the organization to	<b>ID.AM-1:</b> Physical devices and systems within the organization are inventoried.		CM-8, PM-5	Technical Support Specialist
IDENTIFY (ID)	achieve busi- ness purposes are identified and managed consistent with their relative importance to organizational	<b>ID.AM-2:</b> Software platforms and appli- cations within the or- ganization are inven- toried.		CM-8, PM-5	Technical Sup- port Specialist

Table A-1 Securing Property Management Systems: NIST Cybersecurity Framework Components Mapping

NIST Cybersecurity Framework v1.1		Standards and Best Practices			
Func- tion	Category	Subcategory	PCI DSS v3.2.1	NIST SP 800- 53r5 Security and Privacy Con- trols [9]	NICE Framework 2017 Work Roles <u>[11]</u>
	objectives and the organiza- tion's risk strat- egy.				
	Identity Man- agement, Au- thentication, and Access Control (PR.AC): Access		2.1 Always change vendor-supplied de- faults and remove or disable unneces- sary default ac- counts before in- stalling a system on the network.	AC-1, AC-2, IA- 1, IA-2, IA-3, IA- 4, IA-5, IA-6, IA- 7, IA-8, IA-9, IA- 10, IA-11	System Admin- istrator or Product Sup- port Manager
PROTECT (PR)	to physical and logical assets and associated facilities is lim- ited to author- ized users, pro- cesses, and de- vices, and is managed con- sistent with the assessed risk of unauthorized access to au- thorized activi- ties and trans- actions.	<b>PR.AC-1</b> : Identities and credentials are is- sued, managed, veri- fied, revoked, and au- dited for authorized devices, users, and processes.	<ul> <li>3.6.1 Generate strong keys.</li> <li>3.6.2 Keys are only distributed to au- thorized recipients.</li> <li>3.6.3 Stored keys are stored en- crypted.</li> <li>3.6.4 A reasonable crypto period shall be set.</li> <li>3.6.5 A key life cycle shall be established, denoting when keys should be destroyed and when keys should be securely</li> </ul>		

NIST Cybersecurity Framework v1.1		Standards and Best Practices			
Func- tion	Category	Subcategory	PCI DSS v3.2.1	NIST SP 800- 53r5 Security and Privacy Con- trols [ <u>9]</u>	NICE Framework 2017 Work Roles <u>[11]</u>
			kept for ar- chived/legacy en- crypted data. 3.6.7 Keys shall only be accepted from authorized sources.		
		<b>PR.AC-3:</b> Remote access is managed.	<ul> <li>8.1.5 Manage IDs used by third parties to access, support, or maintain system components via re- mote access as fol- lows:</li> <li>enabled only dur- ing the time period needed and disa- bled when not in use</li> <li>monitored when in use</li> </ul>	AC-1, AC-17, AC-19, AC-20, SC-15	Information Systems Security Devel- oper or System Admin- istrator
		<b>PR.AC-4</b> : Access per- missions and authori- zations are managed, incorporating the principles of least privilege and separa- tion of duties.	7.1 Limit access to system components and cardholder data to only those indi- viduals whose job requires such ac- cess.	AC-1, AC-2, AC- 3, AC-5, AC-6, AC-14, AC-16, AC-24	Technical Sup- port Specialist or System Ad- ministrator

NIST Cybersecurity Framework v1.1		Standards and Best Practices			
Func- tion	Category	Subcategory	PCI DSS v3.2.1	NIST SP 800- 53r5 Security and Privacy Con- trols [ <u>9]</u>	NICE Framework 2017 Work Roles <u>[11]</u>
			7.1.2 Restrict access to privileged user IDs to least privi- leges necessary to perform job respon- sibilities.		Technical Sup- port Specialist or System Ad- ministrator
			7.2 Establish an ac- cess control sys- tem(s) for systems components that re- stricts access based on a user's need to know and is set to "deny all" unless specifically allowed.		
		<b>PR.AC-5:</b> Network in- tegrity is protected	1.1 Establish and im- plement firewall and router configuration standards.	AC-4, AC-10, SC-7	Network Oper- ations Specialist
		(e.g., network segre- gation, network seg- mentation).	1.1.4 requirements for a firewall at each internet connection and between any demilitarized zone (DMZ) and the inter- nal network zone		Network Oper- ations Specialist

NIST C	Cybersecurity Fram	nework v1.1	Standards and Best Practices		
Func- tion	Category	Subcategory	PCI DSS v3.2.1	NIST SP 800- 53r5 Security and Privacy Con- trols [9]	NICE Framework 2017 Work Roles <u>[11]</u>
			1.2 Build firewall and router configu- rations that restrict connections be- tween untrusted networks and any system components in the cardholder data environment.		Network Oper- ations Specialist
			1.3.6 Place system components that store cardholder data (such as a data- base) in an internal network zone, seg- regated from the DMZ and other un- trusted networks.		Network Oper- ations Specialist
		<b>PR.AC-6:</b> Identities are proofed and bound to credentials and asserted in inter- actions.	<ul> <li>8.1.6 Limit the number of failed login attempts.</li> <li>8.1.7 Establish a reasonable "cool down period" for lockedout accounts prior to automatic unlocking processes.</li> <li>8.1.8 Reasonable idle time prior to workstation lockout shall be established.</li> <li>8.2 Where appropriate, multifactor authentication (two or more of something</li> </ul>	AC-1, AC-2, AC- 3, AC-16, AC- 19, AC-24, IA-1, IA-2, IA-4, IA-5, IA-8, PE-2, PS-3	Systems Re- quirements Planner

NIST Cybersecurity Framework v1.1		Standards and Best Practices			
Func- tion	Category	Subcategory	PCI DSS v3.2.1	NIST SP 800- 53r5 Security and Privacy Con- trols [ <u>9]</u>	NICE Framework 2017 Work Roles <u>[11]</u>
			you know, some- thing you have, and something you are) shall be imple- mented. 8.2.1 Authentication transactions and data are encrypted at rest and in transit.		
		<b>PR.AC-7:</b> Users, devices, and other assets are authenticated (e.g., single factor, multifactor) commensurate with the risk of the transaction (e.g., individuals' security and privacy risks and other organizational risks).		AC-7, AC-8, AC- 9, AC-11, AC- 12, AC-14, IA-1, IA-2, IA-3, IA-4, IA-5, IA-8, IA-9, IA-10, IA-11	Systems Re- quirements Planner
	Data Security (PR.DS): Infor- mation and records (data) are managed consistent with the organiza- tion's risk strat- egy to protect the confidenti- ality, integrity,	<b>PR.DS-1:</b> Data at rest is protected.	3.2 Do not store sensitive authenti- cation data after au- thorization (even if encrypted). If sensi- tive authentication data is received, render all data unre- coverable upon completion of the authorization pro- cess.	MP-8, SC-12, SC-28	Information Systems Security Devel- oper

NIST Cybersecurity Framework v1.1		Standards and Best Practices			
Func- tion	Category	Subcategory	PCI DSS v3.2.1	NIST SP 800- 53r5 Security and Privacy Con- trols [ <u>9]</u>	NICE Framework 2017 Work Roles <u>[11]</u>
	and availability of information.		<ul> <li>3.2.1 Do not store the full contents of any track (from the magnetic stripe lo- cated on the back of a card, equivalent data contained on a chip, or elsewhere) after authorization. This data is alterna- tively called full track, track, track 1, track 2, and mag- netic-stripe data.</li> <li>3.2.2 Do not store the card verification code or value (three-digit or four- digit number printed on the front or back of a pay- ment card used to verify card-not-pre- sent transactions) after authorization.</li> <li>3.2.3 Do not store the personal identi- fication number (PIN) or the en- crypted PIN block after authorization.</li> </ul>	trois [9]	Roles [11] Information Systems Security Devel- oper Information Systems Security Devel- oper Information Systems Security Devel- oper

NIST Cybersecurity Framework v1.1		Standards and Best Practices			
Func- tion	Category	Subcategory	PCI DSS v3.2.1	NIST SP 800- 53r5 Security and Privacy Con- trols [9]	NICE Framework 2017 Work Roles <u>[11]</u>
			3.4 Render Primary Account Number unreadable any- where it is stored (including on porta- ble digital media, backup media, and in logs) by using any of the following ap- proaches:		Information Systems Security Devel- oper
		<b>PR.DS-2</b> : Data in transit is protected.	1.2.3 Install perime- ter firewalls be- tween all wireless networks and the cardholder data en- vironment, and con- figure these fire- walls to deny or, if traffic is necessary for business pur- poses, permit only authorized traffic between the wire- less environment and the cardholder data environment.	SC-8, SC-11, SC- 12	Information Systems Security Devel- oper or Cyber Defense Analyst
			1.3 Prohibit direct public access be- tween the internet and any system component in the cardholder data en- vironment.		Information Systems Security Devel- oper or Cyber Defense Analyst

NIST Cybersecurity Framework v1.1			Standards and Best Practices		
Func- tion	Category	Subcategory	PCI DSS v3.2.1	NIST SP 800- 53r5 Security and Privacy Con- trols [9]	NICE Framework 2017 Work Roles <u>[11]</u>
		<b>PR.DS-5:</b> Protections against data leaks are implemented.		AC-4, AC-5, AC- 6, PE-19, PS-3, PS-6, SC-7, SC- 8, SC-13, SC-31, SI-4	Information Systems Secu- rity Developer
	Information Protection Pro- cesses and Pro- cedures (PR.IP): Secu- rity policies (that address purpose, scope, roles, responsibilities,	<b>PR.IP-1:</b> A baseline configuration of infor- mation technol- ogy/industrial control systems is created and maintained, in- corporating security principles (e.g., con- cept of least function- ality).		CM-2, CM-3, CM-4, CM-5, CM-6, CM-7, CM-9, SA-10	Enterprise Ar- chitect or Cyber Policy and Strategy Planner
	management commitment, and coordina- tion among or- ganizational entities), pro- cesses, and procedures are maintained and used to man- age protection of information systems and assets.	<b>PR.IP-3:</b> Configuration change control processes are in place.		CM-3, CM-4, SA-10	Systems Devel- oper or Systems Secu- rity Analyst

NIST Cybersecurity Framework v1.1		Standards and Best Practices			
Func- tion	Category	Subcategory	PCI DSS v3.2.1	NIST SP 800- 53r5 Security and Privacy Con- trols [9]	NICE Framework 2017 Work Roles <u>[11]</u>
	Protective Technology (PR.PT): Tech- nical security solutions are managed to	<b>PR.PT-3:</b> The principle of least functionality is incorporated by configuring systems to provide only essen- tial capabilities.	1.2.1 Restrict in- bound and out- bound traffic to that which is necessary for the cardholder data environment, and specifically deny all other traffic.	AC-3, CM-7	Privacy Of- ficer/Privacy Compliance Manager
ensure the se- curity and resil- ience of sys- tems and as- sets, consistent with related policies, proce- dures, and agreements.	<b>PR.PT-4:</b> Communica- tions and control net- works are protected.		AC-4, AC-17, AC-18, CP-8, SC-7, SC-20, SC- 21, SC-22, SC- 23, SC-24, SC- 25, SC-29, SC- 32, SC-36, SC- 37, SC-38, SC- 39, SC-40, SC- 41, SC-43	Security Archi- tect or Communica- tions Security (COMSEC) Manager	
PTTO </td <td><b>DE.AE-2:</b> Detected events are analyzed to understand attack targets and methods.</td> <td></td> <td>AU-6, CA-7, IR- 4, SI-4</td> <td>Cyber Defense Analyst</td>	<b>DE.AE-2:</b> Detected events are analyzed to understand attack targets and methods.		AU-6, CA-7, IR- 4, SI-4	Cyber Defense Analyst	
	tinuous Moni- toring (DE.CM): The information	<b>DE.CM-1:</b> The net- work is monitored to detect potential cy- bersecurity events.		AC-2, AU-12, CA-7, CM-3, SC- 5, SC-7, SI-4	Cyber Defense Analyst

NIST Cybersecurity Framework v1.1			Standards and Best Practices		
Func- tion	Category	Subcategory	PCI DSS v3.2.1	NIST SP 800- 53r5 Security and Privacy Con- trols [9]	NICE Framework 2017 Work Roles <u>[11]</u>
	sets are moni- tored to iden- tify cybersecu- rity events and verify the ef- fectiveness of protective measures.	<b>DE.CM-3:</b> Personnel activity is monitored to detect potential cybersecurity events.		CA-7, PE-3, PE- 6, PE-20	Network Oper- ations Specialist
		<b>DE.CM-7:</b> Monitoring for unauthorized personnel, connections, devices, and software is performed.		AU-12, CA-7, CM-3, CM-8, PE-3, PE-6, PE- 20, SI-4	Threat/Warn- ing Analyst
	Detection Pro- cesses (DE.DP): Detection pro- cesses and pro- cedures are maintained and tested to en- sure awareness of anomalous events.	<b>DE.DP-4</b> : Event detection information is communicated.	<ul> <li>10.1 Audit logs are generated, documenting user activity.</li> <li>10.2 Audit events are logged.</li> <li>10.2.1 User account privileges are documented.</li> <li>10.2.7 The creation and deletion of system level objects are logged.</li> <li>10.3 Events are logged.</li> <li>10.3 Events are logged so that they are auditable.</li> <li>10.5 Audit logs are strongly protected, including encryption</li> </ul>	AU-6, CA-2, CA- 7, RA-5, SI-4	Cyber Defense Infrastructure Support Spe- cialist

NIST Cybersecurity Framework v1.1		Standards and Best Practices			
Func- tion	Category	Subcategory	PCI DSS v3.2.1	NIST SP 800- 53r5 Security and Privacy Con- trols [ <u>9]</u>	NICE Framework 2017 Work Roles <u>[11]</u>
			and strong role- based authentica- tion for authorized log users.		

# Appendix B Privacy Framework Mapping

Table B-1 shows National Institute of Standards and Technology (*NIST*) *Privacy Framework* Subcategories as outcomes addressed in this practice guide and mapped to the property management (PMS) reference design components.

Table B-1 Securing Property Management Systems: NIST Privacy Framework Components Mapping

Privacy Frame- work Function	Privacy Frame- work Category	Privacy Framework Subcate- gory	PMS Reference Design Compo- nent
Identify-P	Inventory and Mapping (ID.IM-P)	<b>ID.IM-P4:</b> Data actions of the systems/products/services are inventoried.	Forescout CounterACT 8.1
		<b>ID.IM-P8:</b> Data processing is mapped, illustrating the data actions and associated data ele- ments for systems/prod- ucts/services, including compo- nents, roles of the component owners/operators, and interac- tions of individuals or third par- ties with the systems/prod- ucts/services.	CryptoniteNXT Secure Zone 2.9.1 StrongKey KeyAppliance
Control-P	Data Processing Management (CT.DM-P)	<b>CT.DM-P1:</b> Data elements can be accessed for review.	Solidres PMS Forescout CounterACT 8.1
		<b>CT.DM-P2:</b> Data elements can be accessed for transmission or disclosure.	Solidres PMS
		<b>CT.DM-P3:</b> Data elements can be accessed for alteration.	Solidres PMS
		<b>CT.DM-P4:</b> Data elements can be accessed for deletion.	Solidres PMS
		<b>CT.DM-P8:</b> Audit/log records are determined, documented, implemented, and reviewed in accordance with policy and in- corporating the principle of data minimization.	Remediant SecureONE 18.06.3- ce

# Appendix C Deployment Recommendations

The example implementation was developed in a lab environment. It does not reflect the complexity of a production environment, and we did not use production deployment processes. Before production deployment, it should be confirmed that the example implementation capabilities meet the organization's architecture, reliability, and scalability requirements.

Deployment of a zero trust architecture to secure a property management system (PMS) into an existing infrastructure will require an organization to consider its existing practices for interoperability and usability.

Deployers should adhere to best practice guidance for vulnerability and patch management [20], continuity of operations planning, and environment elements that are not addressed in this document.

The individual organizations that compose every enterprise are experiencing an increase in the frequency, creativity, and severity of cybersecurity attacks. The National Institute of Standards and Technology recommends that all organizations and enterprises, regardless of size or type, should ensure that cybersecurity risks receive appropriate attention as they carry out their Enterprise Risk Management (ERM) functions. As such, a deployment of a zero trust architecture around a PMS reduces cybersecurity risk and should be included in all the cybersecurity risk information used to inform the overall ERM [21]. By doing so, enterprises and their component organizations can better identify, assess, and manage their cybersecurity risks in the context of their broader mission and business objectives.

# Appendix D List of Acronyms

2FA	Two-Factor Authentication
CNSSI	Committee on National Security Systems Instruction
CRS	Central Reservation System
FIPS	Federal Information Processing Standards
GDPR	General Data Protection Regulation
IP	Internet Protocol
ІТ	Information Technology
ют	Internet of Things
NCCoE	National Cybersecurity Center of Excellence
NIST	National Institute of Standards and Technology
PII	Personally Identifiable Information
PMS	Property Management System
POS	Point of Sale
SP	Special Publication
VLAN	Virtual Local Area Network
ZTA	Zero Trust Architecture

# Appendix E Glossary

Access Control	The process of granting or denying specific requests: 1) for obtaining and using information and related information processing services; and 2) to enter specific physical facilities (e.g., Federal buildings, military establishments, and border crossing entrances).
	SOURCE: Committee on National Security Systems Instruction (CNSSI) 4009- 2015
Architecture	The design of the network of the hotel environment and the components that are used to construct it.
Authentication	The process of verifying the identity of a user, process, or device, often as a prerequisite to allowing access to resources in an information system.
	SOURCE: Federal Information Processing Standards (FIPS) 200
Authorized User	Any appropriately provisioned individual with a requirement to access an information system.
	SOURCE: CNSSI 4009-2015
Console	A visually oriented input and output device used to interact with a computational resource.
Continuous Monitoring	Maintaining ongoing awareness of information security, vulnerabilities, and threats to support organizational risk management decisions.
	SOURCE: National Institute of Standards and Technology (NIST) Special Publication (SP) 800-150
Firewall	A part of a computer system or network that is designed to block unauthorized access while permitting outward communication.
	SOURCE: NIST SP 800-152
Information Security	The protection of information and information systems from unauthorized access, use, disclosure, disruption, modification, or destruction in order to provide confidentiality, integrity, and availability.
	SOURCE: FIPS 200

Multifactor Authentication	Authentication using two or more factors to achieve authentication. Factors include: (i) something you know (e.g., password/personal identification number [PIN]); (ii) something you have (e.g., cryptographic identification device, token); or (iii) something you are (e.g., biometric).
	SOURCE: CNSSI 4009-2015
Personally Identifiable Information	Information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual.
	SOURCE: NIST SP 800-37 Rev. 2
Privilege	A right granted to an individual, a program, or a process.
	SOURCE: CNSSI 4009-2015
Security Control	A safeguard or countermeasure prescribed for an information system or an organization designed to protect the confidentiality, integrity, and availability of its information and to meet a set of defined security requirements.
	SOURCE: NIST SP 800-161
Vulnerability	Weakness in an information system, system security procedures, internal controls, or implementation that could be exploited or triggered by a threat source.
	SOURCE: FIPS 200
Wi-Fi	A generic term that refers to a wireless local area network that observes the IEEE 802.11 protocol.
	SOURCE: NIST Interagency or Internal Report 7250

## Appendix F References

- [1] National Cybersecurity Center of Excellence (NCCoE) Securing Property Management Systems for the Hospitality Sector, A Notice by the National Institute of Standards and Technology on 11/24/2017. Available at <u>https://www.federalregister.gov/documents/2017/11/24/2017-25427/national-cybersecurity-center-of-excellence-nccoe-securing-property-managementsystems-for-the.</u>
- [2] Hotel Technology Next Generation (HTNG). Secure Payments Framework for Hospitality, version 1.0. Feb. 2013. Available at <u>https://cdn.ymaws.com/htng.site-ym.com/resource/collection/CC1CE2B8-0377-457E-9AB0-27CFDD77E17B/HTNG\_Secure\_Payments\_Framework\_v1.0\_FINAL.pdf</u>.
- [3] HTNG. Payment Tokenization Specification. Feb. 21, 2018. Available at <u>https://cdn.ymaws.com/htng.site-ym.com/resource/collection/CC1CE2B8-0377-457E-9AB0-</u> <u>27CFDD77E17B/HTNG\_Secure\_Payments\_Framework\_v1.0\_FINAL.pdf</u>.
- [4] HTNG. Payment Systems & Data Security Specifications 2010B. Oct. 22, 2010. Available at https://cdn.ymaws.com/www.htng.org/resource/resmgr/Files/Specifications/2010B/HTNG\_201 0B\_PaymentsWG\_Paymen.pdf.
- [5] HTNG. EMV for the US Hospitality Industry. Oct. 1, 2015. Available at https://cdn.ymaws.com/sites/htng.site-ym.com/resource/collection/CC1CE2B8-0377-457E-9AB0-27CFDD77E17B/2015-09-23 EMV\_White\_Paper.pdf.
- [6] Payment Card Industry Data Security Standard version 3.2.1. May 2018. Available at https://www.pcisecuritystandards.org/documents/PCI\_DSS-QRG-v3\_2\_1.pdf.
- [7] HTNG. GDPR for Hospitality. June 1, 2019. Available at https://cdn.ymaws.com/www.htng.org/resource/collection/CC1CE2B8-0377-457E-9AB0-27CFDD77E17B/GDPR for Hospitality - V2 - 2019.pdf.
- [8] National Institute of Standards and Technology (NIST). Framework for Improving Critical Infrastructure Cybersecurity, Version 1.1. Apr. 16, 2018. Available at <u>https://nvlpubs.nist.gov/nistpubs/CSWP/NIST.CSWP.04162018.pdf</u>.
- Joint Task Force Transformation Initiative, Security and Privacy Controls for Information Systems and Organizations, NIST Special Publication (SP) 800-53 Rev. 5, NIST, Gaithersburg, Md., Sept.
   2020. Available at <a href="https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-53r5.pdf">https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-53r5.pdf</a>.
- [10] P. Grassi et al., *Digital Identity Guidelines*, NIST SP 800-63-3, NIST, Gaithersburg, Md., June 22, 2017. Available at <u>https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-63-3.pdf</u>.

- [11] R. Petersen et al., *Workforce Framework for Cybersecurity (NICE Framework)*, NIST SP 800-181 Revision 1, NIST, Gaithersburg, Md., Nov. 2020. Available at <u>https://www.nist.gov/itl/applied-cybersecurity/nice/nice-framework-resource-center</u>.
- [12] National Institute of Standards and Technology. *NIST Privacy Framework: A Tool for Improving Privacy through Enterprise Risk Management*, Version 1.0. Available at <u>https://www.nist.gov/system/files/documents/2020/01/16/NIST%20Privacy%20Framework\_V1</u> <u>.0.pdf</u>.
- [13] S. Rose et al., *Zero Trust Architecture*, NIST SP 800-207, NIST, Gaithersburg, Md., Aug. 2020, 59 pp. Available at <u>https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-207.pdf</u>.
- [14] Abbasi et al., 2019 Trustwave Global Security Report, 2019 Trustwave Holdings, Inc. Available at https://www.trustwave.com/en-us/resources/library/documents/2019-trustwave-globalsecurity-report/.
- [15] \*NIST. *Risk Management Framework: Quick Start Guides*. Available at <u>https://csrc.nist.gov/Projects/risk-management</u>.
- [16] Joint Task Force, Risk Management Framework for Information Systems and Organizations, NIST SP 800-37 Revision 2, NIST, Gaithersburg, Md., Dec. 2018. Available at <u>https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-37r2.pdf</u>.
- [17] Joint Task Force, Guide for Conducting Risk Assessments, NIST SP 800-30 Revision 1, NIST, Gaithersburg, Md., Sept. 2012. Available at https://nvlpubs.nist.gov/nistpubs/Legacy/SP/nistspecialpublication800-30r1.pdf.
- [18] Social Tables. *Cybersecurity for Hotels: 6 Threats Just Around the Corner from Your Property.* Available at <u>https://www.socialtables.com/blog/hospitality/cyber-security-hotels/.</u>
- [19] C. Paulsen, R. Byers, Glossary of Key Information Security Terms, NIST Interagency or Internal Report NISTIR) 7298 Rev. 3, NIST, Gaithersburg, Md., July 2019. Available at <u>https://csrc.nist.gov/glossary/term/vulnerability</u>.
- [20] NCCoE. Critical Cybersecurity Hygiene: Patching the Enterprise. Available at https://www.nccoe.nist.gov/projects/building-blocks/patching-enterprise.
- [21] NIST. NISTIR 8286: Integrating Cybersecurity and Enterprise Risk Management (ERM), Oct. 2020. Available at <u>https://nvlpubs.nist.gov/nistpubs/ir/2020/NIST.IR.8286.pdf</u>.

\*Superseded on March 15, 2021 by Quick Start Guides (QSG) for the RMF Steps found at the bottom of <u>https://csrc.nist.gov/Projects/risk-management/about-rmf</u> which is a link off of NIST's new NIST Risk Management Framework (RMF) <u>https://csrc.nist.gov/Projects/risk-management</u> website.