

Contents

1.	II	NTRODUCTION	3
	1.1.	GENERAL STATEMENT	3
	1.2.	GAMING PRODUCTION ENVIRONMENT (GPE)	3
	1.3.	GAMING INFORMATION SECURITY MANAGEMENT SYSTEM (GISMS)	3
	1.4.	FRAMEWORK PURPOSE	4
2.	G	ils audits	4
	2.1.	AUDIT OVERVIEW	4
		AUDIT METHODS	
		AUDIT TASKS	
	2.4.	AUDIT FREQUENCY	6
	2.5.	GIS AUDIT REPORTS	7
	2.6.	CORRECTIVE ACTIONS	7
	2.7.	INDEPENDENT SECURITY FIRM (ISF)	8
ΑF	PEN	DIX: GAMING INFORMATION SECURITY (GIS) CONTROLS	9
	A.	ADOPTED CIS CRITICAL SECURITY CONTROLS	10
	B.	ADDITIONAL GIS COMMON CONTROLS	14
1A	NEX	I: SCORING THE RISKS	31
11	INEX	II: DEFINITIONS OF TERMS	32

1. INTRODUCTION

1.1. General Statement

The integrity and accuracy of the operation of a Gaming Production Environment (GPE) is highly dependent upon operational procedures, configurations, and the network infrastructure. With ever emerging threats to gaming operations, regulatory bodies rely heavily on the expertise of a qualified Independent Security Firm (ISF) to perform gaming security assessments as an essential addition to the testing and certification of the Critical System Components of a GPE by an Independent Test Laboratory (ITL). This module of the GLI Gaming Security Framework, GLI-GSF-1, sets forth the gaming information security (GIS) common controls necessary for auditing a Gaming Enterprise's Gaming Information Security Management System (GISMS) to ensure effective management of security in a Gaming Enterprise's GPE. These GIS common controls apply to GPEs used for all forms of gaming, such as casino gaming, lottery, event wagering, and interactive gaming. Depending on the type of Gaming Enterprise, additional modules of the GLI-GSF may also apply.

NOTE: The entire GLI Gaming Security Framework (GLI-GSF) is available free of charge at www.gaminglabs.com.

1.2. Gaming Production Environment (GPE)

A GPE refers to the operational setting where gaming activities and related services are conducted, managed, and delivered to patrons in a live or real-time manner. It encompasses the physical and virtual infrastructure, systems, software, and processes required to facilitate various forms of gaming, such as casino gaming, lottery, event wagering, and interactive gaming. The GPE also encompasses the backend systems, business applications, and infrastructure that interface and/or support gaming activities. Key characteristics of a GPE include:

- a. Critical System Components: This includes the hardware and software platforms that support the execution of gaming activities, such as gaming devices, gaming tables, gaming systems, lottery systems, event wagering systems, and interactive gaming systems or applications.
- b. Cryptographic Modules: Cryptographic modules used within the GPE are responsible for cryptographic functions, including the encryption and decryption of sensitive data, using algorithms which meet current industry accepted standards, such as ISO/IEC 19790, FIPS 140-2, or equivalent.
- c. Transaction Processing: The GPE processes monetary transactions related to gaming activities, including wagers, payouts, deposits, withdrawals, and financial transactions with patrons.
- d. Security Measures: Robust security measures are implemented to safeguard the integrity, confidentiality, and availability of Critical System Components, sensitive data, financial transactions, and patron information against unauthorized access, fraud, manipulation, and cyber threats.
- e. Risk Management: The GPE employs risk management practices to identify, assess, mitigate, and monitor risks associated with gaming operations, including operational risks, financial risks, regulatory risks, and technological risks.
- f. Continuous Operation: A GPE typically operates 24/7 to meet patron demand and maximize revenue generation. This requires high availability, reliability, and resilience of infrastructure and systems to minimize downtime and disruptions.
- g. Monitoring and Control: Real-time monitoring, surveillance, and control mechanisms are in place to oversee gaming activities, detect anomalies, ensure compliance with rules and regulations, and respond promptly to GIS incidents, fraud, or other issues.
- h. Regulatory Compliance: Compliance with gaming regulations, licensing requirements, and industry standards is essential in a GPE to ensure fair play, patron protection, responsible gaming practices, and adherence to legal and regulatory obligations.

1.3. Gaming Information Security Management System (GISMS)

A GISMS is a structured framework and set of processes designed to safeguard a Gaming Enterprise's sensitive data, assets, and Critical System Components within its GPE against unauthorized access, disclosure, alteration, or destruction. It encompasses policies, procedures, controls, and risk management practices specifically tailored to the unique challenges and regulatory requirements of the gaming industry by involving the identification of GIS

risks, the implementation of appropriate controls and safeguards, ongoing monitoring and assessment of security measures, and continuous improvement to adapt to evolving threats and compliance requirements.

1.4. Framework Purpose

Ensuring the security and integrity of gaming activities is paramount for upholding public confidence and trust in the sector. Therefore, casinos, lotteries, event wagering operations, interactive gaming operations, and other Gaming Enterprises shall establish and uphold a clearly defined and documented framework to attain and preserve public trust in their operations. The goal is to align GIS in such a way that gaming operations can function as other eCommerce operations to ensure a safe and stable environment with the secure features of operations in parallel industries.

2. GIS AUDITS

2.1. Audit Overview

The GIS audit is performed with the intent of identifying any actual or potential instances of non-compliance, vulnerabilities, or weaknesses, and assuring that the integrity, confidentiality, and availability of the information under the Gaming Enterprise's control are preserved. This approach relies heavily on layered security to reduce the risk to computer and network systems. The layered approach provides redundancy and reinforces the overall security model, as several layers of security shall be breached before a critical data store is accessed.

NOTE: The focus of the GIS guidance detailed in the GLI-GSF-1 is on common information security controls for gaming, other evaluation methods are discussed in supporting modules of the GLI-GSF.

2.2. Audit Methods

A GIS audit uses a range of assessment methods including the following methods, the results of which are used to support the determination of GIS control effectiveness over time:

- a. Interview: A type of assessment method characterized by the process of conducting discussions with individuals or groups within a Gaming Enterprise to facilitate understanding, achieve clarification, or lead to the location of evidence.
- b. Examine: A type of assessment method characterized by the process of checking, inspecting, reviewing, observing, studying, or analyzing one or more assessment objects to facilitate understanding, achieve clarification, or obtain evidence.
- c. Test: A type of assessment method characterized by the process of exercising one or more audit objects under specified conditions to compare actual with expected behavior.

2.3. Audit Tasks

The following are the high-level, suggested audit activities. The Appendix details the minimum GIS common control requirements in more granular detail. Users of this document are directed to the Appendix to ensure that no necessary GIS controls are overlooked. The GIS controls listed in the Appendix are not exhaustive and additional GIS controls may be included based on regulatory requirements and scope of the assessment.

2.3.1. Submitted Documentation Review

The ISF first evaluates the Gaming Enterprise's existing GIS controls by collecting and reviewing relevant documentation to better understand and assess pertinent aspects of the GPE in relation to overall GIS, and to determine if the documentation adequately complements the technical controls. An example of some of the documentation expected to be reviewed includes, but is not limited to:

- a. GIS policy
- b. User access
- c. Development and testing procedures
- d. Service Level Agreement

- e. Policy on use of network services
- f. Detection, prevention, and recovery controls to protect against malicious code
- g. Data backup policy
- h. Procedures in place so that media is disposed of securely and safely
- i. Procedures for the handling and storage of information (to protect the information from unauthorized disclosure or misuse)
- j. Change Management Program
- k. Procedures for monitoring use of information processing facilities
- I. Policies, operational plans, and procedures for teleworking activities
- m. Policy on the use of cryptographic controls
- n. Network diagram

2.3.2. Key Personnel Interviews

After collecting and reviewing relevant documentation, the ISF interviews key personnel (users, administrators, and management) to identify undocumented practices and gain feedback. As part of the interview process, the ISF discusses the actual practices in use and throughout the other phases of the assessment, the ISF identifies procedures in use based on the technical results of the assessment. This information allows the ISF to identify procedural gaps and good practices that are not fully documented in the formal policies and procedures. Additionally, the ISF gauges the level of user awareness during the interviews to determine if users outside of the IT function have an appropriate level of understanding of GIS and their role in protecting information and other critical assets. The following key personnel responsible for establishing the GIS policy and applying shall be interviewed at a minimum.

- a. Person with overall responsibility for the gaming operation
- b. Compliance officer
- c. Information security officer
- d. Operational staff
- e. Software developers

2.3.3. Administrative Controls Assessment

The ISF performs testing and evaluations to assess the effectiveness and adequacy of these administrative measures in mitigating risks and ensuring compliance with security requirements. This assessment typically addresses the following topics:

- a. Policies. Standards and Guidelines
- b. Organizational Security
- c. Operations Management
- d. Patch and Management Update
- e. Monitoring System Access and Use
- f. Change management procedures
- g. Asset Classification and Control
- h. Contingency Planning
- i. GIS Incident Response

2.3.4. Technical Controls Assessment

The ISF performs testing and evaluations to assess the effectiveness and adequacy of these technical safeguards in mitigating risks and protecting sensitive data. This assessment typically addresses the following topics:

- a. Infrastructure Design
- b. Network Surveying / Penetration Testing
- c. Network and Communications Security
- d. Logical Access Controls
- e. Operating Systems (OS) Security
- f. Malicious Software Controls

- g. Database Design and Configuration
- h. Cryptographic Controls
- i. System Monitoring
- j. Reporting and Logging
- k. System Development Controls

2.3.5. Physical and Environmental Controls Assessment

The ISF performs testing and evaluations to assess the effectiveness and adequacy of these controls in safeguarding against physical threats, environmental hazards, and unauthorized access to sensitive areas. This assessment typically addresses the following topics:

- a. Location and Facility Security
- b. Perimeter Security
- c. Access Controls
- d. Equipment Security
- e. Intrusion Detection
- f. Alarm Systems
- g. Surveillance Systems
- h. Heating, Ventilation and Air Conditioning
- i. Power Systems
- j. Power and Communications Cabling
- k. Fire Detection and Suppression
- I. Emergency Response

2.3.6. Risk Assessment

The ISF performs a risk assessment to identify issues of non-conformance to any applicable control, and any potential threats and vulnerabilities that may not be explicitly listed in the GLI-GSF but were observed during the audit and may constitute a risk.

2.4. Audit Frequency

2.4.1. Initial Audit

The Gaming Enterprise shall have a GIS audit performed by an ISF within ninety days of the Gaming Enterprise commencing gaming operations within that jurisdiction unless the regulatory body has advised otherwise. Any postponement of this audit as requested by the Gaming Enterprise, along with an updated audit schedule, shall be authorized by the regulatory body.

NOTE: It is recommended for regulatory bodies to allow flexibility for audit schedules for multi-jurisdictional Gaming Enterprises to allow consolidation of audits for multiple jurisdictions to a common schedule.

2.4.2. Annual Audit

The Gaming Enterprise shall, as a rule, have another GIS audit performed by an ISF within twelve months of the previous GIS audit unless the regulatory body has advised otherwise. Any postponement of this audit as requested by the Gaming Enterprise, along with an updated audit schedule, shall be authorized by the regulatory body.

NOTE: It is recommended for regulatory bodies to allow flexibility for audit schedules for multi-jurisdictional Gaming Enterprises to allow consolidation of audits for multiple jurisdictions to a common schedule.

2.4.3. Additional Audits

Additional GIS audits may be needed more frequently based on the critically of changes within the GPE, such as additions and/or changes which may affect or provide access to sensitive data and/or Critical System

Components. Such GIS audits, as required by the regulatory body and/or the Gaming Enterprise, may be focused on specific functions of, additions to, and/or changes to the GPE.

2.5. GIS Audit Reports

The results of a GIS audit will identify for management those areas in the operations where improvement should be considered and recommend strategies for improving those areas. The GIS audit report shall be submitted to the regulatory body no later than sixty days after the GIS audit has been completed. The GIS audit report shall include all the following:

- a. The name and a brief background of the Gaming Enterprise, mentioning its business model and gaming activities offered or Service Providers used, as well as the location, number of employees, website, actual certifications, high level description of the infrastructure including data center, etc.
- b. The ISF's name, company affiliation, contact information, and qualifications and experience of the individuals who conducted the audit;
- c. The date(s) of the audit, including the request date, the start date, the completion date, the report date, and the expiration date;
- d. The scope of the audit, including:
 - A high level overview of the work undertaken and the control environment operating;
 - ii. The controls against which the audit was conducted;
 - iii. The Critical System Components that were reviewed
 - iv. How the Critical System Components were identified and if the audit included applications, networks, databases, and/or operating systems;
 - v. An indication of any conditions of the audit, including the controls excluded from audit and the reasons for their exclusion;
- e. The audit approach, including enquiry-based questions, observation, evidence, key persons interviewed;
- f. Evidence obtained during the audit to substantiate audit results, including:
 - i. The documents that were reviewed, including version and dates, staff interviewed;
 - ii. The names, dates, and versions of documentation reviewed;
 - iii. The names, roles, and locations of personnel interviewed;
 - iv. The locations visited;
 - v. The details of the walkthroughs performed;
 - vi. The samples reviewed to verify compliance;
- g. The results of the audit, indicating for each control its status as compliant, observation, minor non-conformity, or major non-conformity;
- h. Findings, including:
 - i. An explanation of the non-conformities identified;
 - ii. Evidence that supports and describes the non-conformities;
 - iii. Impact or potential impact of the non-conformities;
 - iv. Recommended corrective actions to be taken to address existing non-conformities and make improvements;
- The Gaming Enterprise's response to the findings and recommended corrective action, including resolution dates and responsible persons; and
- j. Other relevant factors, such as whether the GISMS are compliant or have been audited against other requirements (e.g. ISO/IEC 27001, WLA-SCS, NIST-CSF, etc.)

2.6. Corrective Actions

If the ISF's GIS audit report recommends corrective action, the Gaming Enterprise shall provide the ISF and the regulatory body with a remediation plan and any risk mitigation plans which detail the Gaming Enterprise's actions and schedule to implement the corrective action.

- a. Non-conformities shall be addressed through the Gaming Enterprise's corrective action process, including:
 - i. Actions taken to determine the extent of and contain the specific non-conformance.
 - ii. Root cause investigation to determine the most basic causes of the non-conformance.
 - iii. Actions taken to correct the non-conformance and, in response to the root cause, to eliminate

recurrence of the non-conformance.

- b. Corrective actions to address the identified major non-conformities shall be carried out immediately and the ISF and the regulatory body shall be notified of the actions taken within thirty days, unless otherwise specified by the regulatory body. The ISF shall perform a follow up audit within ninety days to confirm the actions taken, evaluate their effectiveness, and determine whether the non-conformities have been resolved.
- c. Corrective actions to address identified minor non-conformities shall be documented and sent by the Gaming Enterprise to the ISF and the regulatory body for review within thirty days, unless otherwise specified by the regulatory body. If the actions are deemed satisfactory, they will be followed up at the next scheduled audit.
- d. Once corrective actions have been taken, the Gaming Enterprise will provide the ISF and the regulatory body with documentation evidencing completion.
- e. The Gaming Enterprise shall maintain corrective action records, including objective evidence, for at least five years, unless otherwise specified by the regulatory body.

2.7. Independent Security Firm (ISF)

The GIS audit shall be carried out by individuals with sufficient qualifications, which means that the ISF shall hire sufficiently qualified, competent, and experienced individuals. These individuals shall:

- a. Have relevant education background or in other ways provide relevant qualifications in assessing GPEs;
- b. Obtain and maintain certifications sufficient to demonstrate proficiency and expertise as a qualified security professional by recognized certification boards, either nationally or internationally. The following certifications may demonstrate suitability to complete the GIS audit:
 - i. ISO/IEC 27001 Lead Auditor:
 - ii. Certified Information Systems Auditor (CISA);
 - iii. Certified Information Security Manager (CISM);
 - iv. Certified Information Systems Security Professional (CISSP):
- c. Have at least five years' experience performing GIS audits within the gaming industry; and
- d. Meet any other qualifications as prescribed by the regulatory body.

NOTE: Nothing herein is intended to prohibit the regulatory body staff from acting as an ISF, provided they meet the requirements of this section, and they are independent from the Gaming Enterprise being audited.

APPENDIX: GAMING INFORMATION SECURITY (GIS) CONTROLS

The Gaming Information Security (GIS) Controls, as specified in this Appendix, will indicate which Gaming Implementation Group (GIG) the control applies to. To assist Gaming Enterprises of every size, GIGs are divided into three groups, based on the risk profile and resources a Gaming Enterprise has available to them to implement the GLI-GSF. Each GIG identifies a set of the GIS Controls that they need to implement. GIG2 builds upon GIG1, and GIG3 is comprised of all the GIS Controls.

GIG	Gaming Implementation Group (GIG) Description
GIG1	The GLI-GSF defines Implementation Group 1 (GIG1) as essential gaming security hygiene and represents an emerging minimum standard of GIS for all Gaming Enterprises. The GIS Controls included in GIG1 are what every Gaming Enterprise should apply to defend against the most common attacks. A GIG1 Gaming Enterprise typically has limited security expertise to dedicate towards protecting critical assets and personnel. A common concern of Gaming Enterprises is to keep their gaming operations operational, as they have a limited tolerance for downtime. The criticality of the sensitive data that they are trying to protect is low and principally surrounds employee and financial information. GIS Controls selected for GIG1 should be implementable with limited gaming security expertise and aimed to thwart general, non-targeted attacks. These GIS Controls will also typically be designed to work in conjunction with small or home office commercial off-the-shelf (COTS) hardware and software.
GIG2	The GIS Controls selected for GIG2 can help security teams cope with increased operational complexity. Some GIS Controls will depend on Gaming Enterprise-grade technology and specialized expertise to properly install and configure. A GIG2 Gaming Enterprise employs individuals who are responsible for managing and protecting GPE infrastructure. These Gaming Enterprises typically support multiple departments with differing risk profiles based on job function and mission. Small Gaming Enterprise units may have regulatory compliance burdens. GIG2 Gaming Enterprises often store and process sensitive data and can withstand short interruptions of service. A major concern is loss of public confidence if a breach occurs. All Gaming Enterprises running land-based gaming operations in which the GPE is continuously communicating over internet/public networks (e.g. lotteries, casinos with off-site systems, retail sports wagering, etc.) are to be treated as GIG2 Gaming Enterprises, unless otherwise specified by the regulatory body.
GIG3	A GIG3 Gaming Enterprise commonly employs gaming security experts that specialize in the different facets of gaming security (e.g., risk management, penetration testing, application security). A GIG3 Gaming Enterprise's critical assets contain sensitive data or functions that are subject to regulatory and compliance oversight. A GIG3 Gaming Enterprise shall address availability of services and the integrity and confidentiality of sensitive data. Successful attacks can cause significant harm to public welfare. GIS Controls selected for GIG3 shall abate targeted attacks from a sophisticated adversary and reduce the impact of zero-day attacks. All Gaming Enterprises running online gaming operations (e.g. interactive gaming, online event wagering, etc.) are to be treated as GIG3 Gaming Enterprises, unless otherwise specified by the regulatory body.

A. Adopted CIS Critical Security Controls

To establish a clear and reasonable baseline for GIS Controls, the GLI-GSF incorporates by reference the following controls of the Center for Internet Security (CIS) Critical Security Controls, Version 8.1, which shall be met by each Gaming Enterprise (Enterprise). The right side column indicates the applicable Gaming Implementation Group (GIG) the CIS Control applies to.

NOTE: The entire CIS Critical Security Controls Document is available free of charge at www.cisecurity.org.

CIS-1	Inventory and Control of Enterprise Assets	GIG
CIS-1.1	Establish and Maintain Detailed Enterprise Asset Inventory	GIG1
CIS-1.2	Address Unauthorized Assets	GIG1
CIS-2	Inventory and Control of Software Assets	GIG
CIS-2.1	Establish and Maintain a Software Inventory	GIG1
CIS-2.2	Ensure Authorized Software is Currently Supported	GIG1
CIS-2.3	Address Unauthorized Software	GIG1
CIS-3	Data Protection	GIG
CIS-3.1	Establish and Maintain a Data Management Process	GIG1
CIS-3.2	Establish and Maintain a Data Inventory	GIG1
CIS-3.4	Enforce Data Retention	GIG1
CIS-3.5	Securely Dispose of Data	GIG1
CIS-3.6	Encrypt Data on End-User Devices	GIG1
CIS-3.7	Establish and Maintain a Data Classification Scheme	GIG2
CIS-3.9	Encrypt Data on Removable Media	GIG2
CIS-3.10	Encrypt Sensitive Data in Transit	GIG2
CIS-3.11	Encrypt Sensitive Data at Rest	GIG2
CIS-3.14	Log Sensitive Data Access	GIG3
CIS-4	Secure Configuration of Enterprise Assets and Software	GIG
CIS-4.1	Establish and Maintain a Secure Configuration Process	GIG1
CIS-4.2	Establish and Maintain a Secure Configuration Process for Network Infrastructure	GIG1
CIS-4.3	Configure Automatic Session Locking on Enterprise Assets	GIG1
CIS-4.4	Implement and Manage a Firewall on Servers	GIG1
CIS-4.6	Securely Manage Enterprise Assets and Software	GIG1
CIS-4.7	Manage Default Accounts on Enterprise Assets and Software	GIG1
CIS-4.8	Uninstall or Disable Unnecessary Services on Enterprise Assets and Software	GIG2
CIS-4.9	Configure Trusted DNS Servers on Enterprise Assets	GIG2
CIS-4.10	Enforce Automatic Device Lockout on Portable End-User Devices	GIG2
CIS-5	Account Management	GIG
CIS-5.1	Establish and Maintain an Inventory of Accounts	GIG1
CIS-5.2	Use Unique Passwords	GIG1
CIS-5.3	Disable Dormant Accounts	GIG1
CIS-5.4	Restrict Administrator Privileges to Dedicated Administrator Accounts	GIG1
CIS-5.5	Establish and Maintain an Inventory of Service Accounts	GIG2

CIS-6	Access Control Management	GIG
CIS-6.1	Establish an Access Granting Process	GIG1
CIS-6.2	Establish an Access Revoking Process	GIG1
CIS-6.3	Require MFA for Externally-Exposed Applications	GIG1
CIS-6.4	Require MFA for Remote Network Access	GIG1
CIS-6.5	Require MFA for Administrative Access	GIG1
CIS-6.7	Centralize Access Control	GIG2
CIS-6.8	Define and Maintain Role-Based Access Control	GIG3
CIS-7	Continuous Vulnerability Management	GIG
CIS-7.1	Establish and Maintain a Vulnerability Management Process	GIG1
CIS-7.2	Establish and Maintain a Remediation Process	GIG1
CIS-7.3	Perform Automated Operating System Patch Management	GIG1
CIS-7.4	Perform Automated Application Patch Management	GIG1
CIS-7.5	Perform Automated Vulnerability Scans of Internal Enterprise Assets	GIG2
CIS-7.6	Perform Automated Vulnerability Scans of Externally-Exposed Enterprise Assets	GIG2
CIS-7.7	Remediate Detected Vulnerabilities	GIG2
CIS-8	Audit Log Management	GIG
CIS-8.1	Establish and Maintain an Audit Log Management Process	GIG1
CIS-8.2	Collect Audit Logs	GIG1
CIS-8.3	Ensure Adequate Audit Log Storage	GIG1
CIS-8.4	Standardize Time Synchronization	GIG2
CIS-8.5	Collect Detailed Audit Logs	GIG2
CIS-8.9	Centralize Audit Logs	GIG2
CIS-8.10	Retain Audit Logs	GIG2
CIS-8.11	Conduct Audit Log Reviews	GIG2
CIS-8.12	Collect Service Provider Logs	GIG3
CIS-9	Email and Web Browser Protections	GIG
CIS-9.1	Ensure Use of Only Fully Supported Browsers and Email Clients	GIG1
CIS-9.2	Use DNS Filtering Services	GIG1
CIS-9.7	Deploy and Maintain Email Server Anti-Malware Protections	GIG3
CIS-10	Malware Defenses	GIG
CIS-10.1	Deploy and Maintain Anti-Malware Software	GIG1
CIS-10.2	Configure Automatic Anti-Malware Signature Updates	GIG1
CIS-10.6	Centrally Manage Anti-Malware Software	GIG2
CIS-10.7	Use Behavior-Based Anti-Malware Software	GIG2
CIS-11	Data Recovery	GIG
CIS-11.1	Establish and Maintain a Data Recovery Process	GIG1
CIS-11.2	Perform Automated Backups	GIG1
CIS-11.3	Protect Recovery Data	GIG1
CIS-11.4	Establish and Maintain an Isolated Instance of Recovery Data	GIG1
CIS-11.5	Test Data Recovery	GIG2

CIS-12	Network Infrastructure Management	GIG
CIS-12.1	Ensure Network Infrastructure is Up-to-Date	GIG1
CIS-12.2	Establish and Maintain a Secure Network Architecture	GIG2
CIS-12.3	Securely Manage Network Infrastructure	GIG2
CIS-12.4	Establish and Maintain Architecture Diagram(s)	GIG2
CIS-12.6	Use of Secure Network Management and Communication Protocols	GIG2
CIS-13	Network Monitoring and Defense	GIG
CIS-13.1	Centralize Security Event Alerting	GIG2
CIS-13.2	Deploy a Host-Based Intrusion Detection Solution	GIG2
CIS-13.3	Deploy a Network Intrusion Detection Solution	GIG2
CIS-13.4	Perform Traffic Filtering Between Network Segments	GIG2
CIS-13.7	Deploy a Host-Based Intrusion Prevention Solution	GIG3
CIS-13.8	Deploy a Network Intrusion Prevention Solution	GIG3
CIS-13.9	Deploy Port-Level Access Control	GIG3
CIS-13.10	Perform Application Layer Filtering	GIG3
CIS-14	Security Awareness and Skills Training	GIG
CIS-14.1	Establish and Maintain a Security Awareness Program	GIG1
CIS-14.2	Train Workforce Members to Recognize Social Engineering Attacks	GIG1
CIS-14.3	Train Workforce Members on Authentication Best Practices	GIG1
CIS-14.4	Train Workforce on Data Handling Best Practices	GIG1
CIS-14.6	Train Workforce Members on Recognizing and Reporting Security Incidents	GIG1
CIS-14.9	Conduct Role-Specific Security Awareness and Skills Training	GIG2
CIS-15	Service Provider Management	GIG
CIS-15.1	Establish and Maintain an Inventory of Service Providers	GIG1
CIS-15.2	Establish and Maintain a Service Provider Management Policy	GIG2
CIS-15.3	Classify Service Providers	GIG2
CIS-15.4	Ensure Service Provider Contracts Include Security Requirements	GIG2
CIS-15.5	Assess Service Providers	GIG3
CIS-15.6	Monitor Service Providers	GIG3
CIS-15.7	Securely Decommission Service Providers	GIG3
CIS-16	Application Software Security	GIG
CIS-16.1	Establish and Maintain a Secure Application Development Process	GIG2
CIS-16.2	Establish and Maintain a Process to Accept and Address Software Vulnerabilities	GIG2
CIS-16.3	Perform Root Cause Analysis on Security Vulnerabilities	GIG2
CIS-16.4	Establish and Manage an Inventory of Third-Party Software Components	GIG2
CIS-16.5	Use Up-to-Date and Trusted Third-Party Software Components	GIG2
CIS-16.6	Establish and Maintain a Severity Rating System and Process for Application Vulnerabilities	GIG2
CIS-16.8	Separate Production and Non-Production Systems	GIG2
CIS-16.9	Train Developers in Application Security Concepts and Secure Coding	GIG2
CIS-16.12	Implement Code-Level Security Checks	GIG2
CIS-16.13	Conduct Application Penetration Testing	GIG3

010.47	la ideal Bernard Management	010
CIS-17	Incident Response Management	GIG
CIS-17.1	Designate Personnel to Manage Incident Handling	GIG1
CIS-17.2	Establish and Maintain Contact Information for Reporting Security Incidents	GIG1
CIS-17.3	Establish and Maintain an Enterprise Process for Reporting Incidents	GIG1
CIS-17.4	Establish and Maintain an Incident Response Process	GIG2
CIS-17.5	Assign Key Roles and Responsibilities	GIG2
CIS-17.6	Define Mechanisms for Communicating During Incident Response	GIG2
CIS-17.7	Conduct Routine Incident Response Exercises	GIG2
CIS-17.8	Conduct Post-Incident Reviews	GIG2
CIS-17.9	Establish and Maintain Security Incident Thresholds	GIG3
CIS-18	Penetration Testing	GIG
CIS-18.1	Establish and Maintain a Penetration Testing Program	GIG2
CIS-18.2	Perform Periodic External Penetration Tests	GIG2
CIS-18.3	Remediate Penetration Test Findings	GIG2
CIS-18.4	Validate Security Measures	GIG3
CIS-18.5	Perform Periodic Internal Penetration Tests	GIG3

B. Additional GIS Common Controls

In addition to the CIS Critical Security Controls adopted previously, the following additional GIS Controls apply to GPEs used for all forms of gaming. The right side column indicates the applicable Gaming Implementation Group (GIG) the GIS Control applies to.

GIS-1	GPE Critical System Component Functions	GIG
GIS-1.1	GPE Internal Clock	
GIS-1.1.1	The GPE shall maintain an internal clock that reflects the current date and time which shall be used to provide for the time stamping of all transactions, configuration changes, and significant events, and as a reference clock for reporting.	GIG1
GIS-1.1.2	Changes to the internal clock's date and time, or the approved time sources, shall be recorded in a log, indicating: a. The date and time of the changes; b. Reason and description of the changes, including initial and final values; and c. User account ID(s) who performed and/or authorized the changes.	GIG1
GIS-1.2	Critical System Component Verification	
GIS-1.2.1	The Critical System Components of the GPE shall be verified as identical to those approved by the regulatory body via a signature verification procedure, which shall be performed: a. Upon installation/updates of components; b. Upon power up or recovery from a shutdown state; c. At least once every 24 hours; and d. On demand.	GIG1
GIS-1.2.2	 The signature verification procedure shall: a. Operate independently of any process or security software within the system. b. Employ a cryptographic hash algorithm which produces a message digest of at least 128 bits. Other test methodologies shall be reviewed on a case-by-case basis. c. Include one or more analytical steps to compare the current signatures of the Critical System Components in the GPE with the signatures of the current approved versions of the Critical System Components. 	GIG1
GIS-1.2.3	 The output of the signature verification procedure shall be recorded in a system log, which shall a. Detail the following for each verification: The date and time of the verification; Identification of each verified Critical System Component; The expected and generated signature results, including indication of any program error or signature mismatch; When performed on demand, user account ID who initiated the verification procedure; Be accessible by the regulatory body in a format which will permit analysis of each verification by the regulatory body; and Comprise part of the sensitive data which shall be recovered in the event of a disaster or equipment or software failure. 	GIG1
GIS-1.2.4	Any failure of signature verification of any Critical System Component shall require a notification of the verification failure being communicated to the Gaming Enterprise and regulatory body as required.	GIG1
GIS-1.2.5	There shall be a process in place for responding to signature verification failures, including determining the cause of the failure and performing the associated corrections or reinstallations of the Critical System Component needed in a timely manner.	GIG1
GIS-2	Gaming Information Security (GIS)	GIG
GIS-2.1	GIS Policy	
GIS-2.1.1	A GIS policy shall be defined and implemented to describe the Gaming Enterprise's approach to managing GIS and its implementation and to ensure that risks are identified, mitigated, and underwritten by contingency plans.	GIG1
GIS-2.1.2	The GIS policy shall have a provision requiring review at planned intervals and when significant changes occur to the GPE or the Gaming Enterprise's processes which alter the risk profile of the system.	GIG1

GIS-2.1.3	The GIS policy shall be approved by management and communicated to and acknowledged by relevant Gaming Enterprise personnel and relevant Service Provider personnel.	GIG1
GIS-2.1.4	The GIS policy shall delineate the security roles and responsibilities of Gaming Enterprise personnel and relevant Service Provider personnel for the operation, service, and maintenance of the GPE.	GIG1
GIS-2.2	Access Control Policy	
GIS-2.2.1	An access control policy shall be established and documented which shall be periodically reviewed based on business and security requirements for physical and logical access to the GPE, including remote access as allowed by the regulatory body.	GIG1
GIS-2.2.2	A formal user registration and de-registration procedure shall be in place for granting and revoking access to the GPE.	GIG1
GIS-2.2.3	The allocation and use of user access rights and privileges shall be restricted and controlled based on business requirements and the principle of least privilege.	GIG2
GIS-2.2.4	Personnel shall only be provided with access to the services or facilities that they have been specifically authorized to use.	GIG1
GIS-2.2.5	Management shall review and confirm user access rights and privileges at regular intervals using a formal process.	GIG2
GIS-2.3	Allocation of Security Responsibilities	
GIS-2.3.1	Security responsibilities shall be effectively documented and implemented.	GIG2
GIS-2.3.2	A security forum comprised of management shall be formally established to monitor and review the GIS policy to ensure its continuing suitability, adequacy, and effectiveness, maintain formal minutes of meetings, and convene periodically as required by the regulatory body.	GIG2
GIS-2.3.3	A security function shall exist that will be responsible for developing and implementing security strategies and action plans.	GIG2
GIS-2.3.4	The security function shall be involved in and review all processes regarding security aspects of the Gaming Enterprise, including, but not be limited to, the protection of information, communications, physical infrastructure, and gaming processes.	GIG2
GIS-2.3.5	The security function shall report to no lower than senior management and not reside within or report to the IT function.	GIG2
GIS-2.3.6	The security function shall have the competences and be sufficiently empowered and have access to all necessary resources to enable adequate assessment, management, and reduction of risk.	GIG2
GIS-2.3.7	The head of the security function shall be a member of the security forum and be responsible for recommending security policies and changes.	GIG2
GIS-2.4 Personally Identifiable Information (PII) Privacy		
GIS-2.4.1	Any PII obtained in respect to the patron shall be protected in compliance with the privacy policy and local privacy regulations and standards observed by the regulatory body, as well as contractual requirements.	GIG1
GIS-2.4.2	Any PII which is not subject to disclosure pursuant to the privacy policy shall be kept confidential, except where the release of that information is required by law.	GIG1
GIS-2.4.3	There shall be procedures in place for the security, sharing, and controlled usage of PII as required by the regulatory body.	GIG1
GIS-2.4.4	The Gaming Enterprise shall designate one or more individuals with primary responsibility for the design, implementation, and ongoing evaluation of procedures and practices related to the security and sharing of PII.	GIG1
GIS-2.4.5	Procedures shall be established to determine the nature and scope of all PII collected by the Gaming Enterprise, including the types of information collected, sources of collection, and purposes of use.	GIG1
GIS-2.4.6	 Where required by the regulatory body, patrons shall be provided with a method to request confirmation of PII processing, access to a copy of their PII and related processing information, updates to their PII, and erasure or processing restrictions of their PII. a. Procedures shall be in place to record and process these requests, maintain records of them, and provide reasons for any denial or rejection. b. Patrons shall be informed when the Gaming Enterprise does not intend to comply with their request and given information on filing a complaint with the regulatory body. 	GIG1

Where required by the regulatory body and upon patron's request, the Gaming Enterprise shall forward to the patrons the PII which they have received from the same patron, in a structured, commonly used, and machine-readable format and transmit the PII to another Gaming Enterprise, where it is technically feasible to do so. This only applies to: a. PII which the patron has provided to the Gaming Enterprise or PII which is processed by automated means (i.e., this would exclude any paper records); and b. Cases where the basis for processing is PII consent, or that the data is being processed to fulfill a contract or steps preparatory to a contract. Where required by the regulatory body, the patron has the right to object to PII processing: a. Based on logitimate interests or the performance of a task in the public interest or in the exercise of official authority; b. Used in direct marketing, including profiling to the extent that it is related to such marketing activities; and c. For scientific or historical research purposes or for the purpose of statistics. There shall be procedures in place for the Gaming Enterprise to comply with requests from patrons to have PII erased and/or to prevent or restrict processing of PII, including, in the following circumstances: a. Where the PII is no longer necessary in relation to the purpose for which it was originally collected/processed; b. When the patron withdraws consent; c. When the patron objects to the PII processing and there is no overriding legitimate interest for continuing the processing; d. The PII was unlawfully processed; or e. The PII shall be erased in order to comply with a legal obligation. Where prohibited by the requilatory body, the Gaming Enterprise may not utilize solely automated decision-making which: a. Produces legal effects the patron such as those which result in the patron being subjected to surveillance by a competent authority; or b. Significantly affects the patron in a similar manner (e.g., it has the potential to influence the circums			
a. Based on legitimate interests or the performance of a task in the public interest or in the exercise of official authority; b. Used in direct marketing, including profiling to the extent that it is related to such marketing activities; and c. For scientific or historical research purposes or for the purpose of statistics. There shall be procedures in place for the Gaming Enterprise to comply with requests from patrons to have PII erased and/or to prevent or restrict processing of PII, including, in the following circumstances: a. Where the PII is no longer necessary in relation to the purpose for which it was originally collected/processed; b. When the patron objects to the PII processing and there is no overriding legitimate interest for continuing the processing; d. The PII was unlawfully processed; or e. The PII shall be erased in order to comply with a legal obligation. Where prohibited by the regulatory body, the Gaming Enterprise may not utilize solely automated decision-making which: a. Produces legal effects the patron such as those which result in the patron being subjected to surveillance by a competent authority; or b. Significantly affects the patron in a similar manner (e.g., it has the potential to influence the circumstances, behavior, or choices of the patron). GIS-2.5 Securing Financial Transactions within the GPE GIS-2.5.1 The collection of sensitive data directly related to each financial transaction within the GPE shall be limited to only the sensitive data strictly needed for the transaction within the GPE shall be limited to only the sensitive data strictly needed for the transaction within the GPE shall be limited to only the sensitive data strictly needed for the transaction within the GPE shall be limited to only the sensitive data strictly needed for the transaction within the GPE shall be limited to only the sensitive data strictly needed for the transaction within the GPE shall be limited to only the sensitive data strictly needed for the transaction details shall employ deach	GIS-2.4.7	commonly used, and machine-readable format and transmit the PII to another Gaming Enterprise, where it is technically feasible to do so. This only applies to: a. PII which the patron has provided to the Gaming Enterprise or PII which is processed by automated means (i.e., this would exclude any paper records); and b. Cases where the basis for processing is PII consent, or that the data is being processed to	GIG1
There shall be procedures in place for the Gaming Enterprise to comply with requests from patrons to have PII erased and/or to prevent or restrict processing of PII, including, in the following circumstances: a. Where the PII is no longer necessary in relation to the purpose for which it was originally collected/processed; b. When the patron objects to the PII processing and there is no overriding legitimate interest for continuing the processing; d. The PII was unlawfully processed; or e. The PII was unlawfully processed; or e. The PII shall be erased in order to comply with a legal obligation. Where prohibited by the regulatory body, the Gaming Enterprise may not utilize solely automated decision-making which: a. Produces legal effects the patron such as those which result in the patron being subjected to surveillance by a competent authority; or b. Significantly affects the patron in a similar manner (e.g., it has the potential to influence the circumstances, behavior, or choices of the patron). GIS-2.5 Securing Financial Transactions within the GPE GIS-2.5.1 Payment methods used for financial transactions in the GPE shall be protected from fraudulent use. GIS-2.5.2 The collection of sensitive data directly related to each financial transaction within the GPE shall be limited to only the sensitive data strictly needed for the transaction. There shall be processes in place for verifying the protection of sensitive data directly related to each financial transaction within the GPE, including any PII given by the patron or payment related data. GIS-2.5.4 Any communication channels within the GPE conveying financial transaction details shall employ encryption to protect against interception. GIG1 GIS-3.1.1 Security Procedures The Gaming Enterprise shall monitor the Critical System Components and the transmission of data of the entire GPE, including communication, data packets, networks, applications, as well as the components and data transmissions of any Service Provider services involved, with the ob	GIS-2.4.8	a. Based on legitimate interests or the performance of a task in the public interest or in the exercise of official authority;b. Used in direct marketing, including profiling to the extent that it is related to such marketing activities; and	GIG1
decision-making which: a. Produces legal effects the patron such as those which result in the patron being subjected to surveillance by a competent authority; or b. Significantly affects the patron in a similar manner (e.g., it has the potential to influence the circumstances, behavior, or choices of the patron). GIS-2.5 Securing Financial Transactions within the GPE GIS-2.5.1 Payment methods used for financial transactions in the GPE shall be protected from fraudulent use. GIS-2.5.2 The collection of sensitive data directly related to each financial transaction within the GPE shall be limited to only the sensitive data strictly needed for the transaction. There shall be processes in place for verifying the protection of sensitive data directly related to each financial transaction within the GPE, including any PII given by the patron or payment related data. GIS-2.5.4 Any communication channels within the GPE conveying financial transaction details shall employ encryption to protect against interception. GIS-3.1.1 Security Procedures The Gaming Enterprise shall monitor the Critical System Components and the transmission of data of the entire GPE, including communication, data packets, networks, applications, as well as the components and data transmissions of any Service Provider services involved, with the objective of ensuring integrity, reliability, and accessibility, as well as to identify anomalous behavior. GIS-3.1.2 The Gaming Enterprise shall monitor and adjust resource capacity and consumption to ensure availability is maintained. GIS-3.1.3 The Gaming Enterprise shall monitor its GPE in order to detect, prevent, mitigate, and respond to common active and passive technical attacks and compromises. GIG1 GIS-3.1.5 The Gaming Enterprise shall establish procedures to gather and analyze threat intelligence, and	GIS-2.4.9	There shall be procedures in place for the Gaming Enterprise to comply with requests from patrons to have PII erased and/or to prevent or restrict processing of PII, including, in the following circumstances: a. Where the PII is no longer necessary in relation to the purpose for which it was originally collected/processed; b. When the patron withdraws consent; c. When the patron objects to the PII processing and there is no overriding legitimate interest for continuing the processing; d. The PII was unlawfully processed; or e. The PII shall be erased in order to comply with a legal obligation.	GIG1
GIS-2.5.1 Payment methods used for financial transactions in the GPE shall be protected from fraudulent use. GIS-2.5.2 The collection of sensitive data directly related to each financial transaction within the GPE shall be limited to only the sensitive data strictly needed for the transaction. There shall be processes in place for verifying the protection of sensitive data directly related to each financial transaction within the GPE, including any PII given by the patron or payment related data. GIS-2.5.4 Any communication channels within the GPE conveying financial transaction details shall employ encryption to protect against interception. GIS-3.1 Security Procedures The Gaming Enterprise shall monitor the Critical System Components and the transmission of data of the entire GPE, including communication, data packets, networks, applications, as well as the components and data transmissions of any Service Provider services involved, with the objective of ensuring integrity, reliability, and accessibility, as well as to identify anomalous behavior. GIS-3.1.2 The Gaming Enterprise shall monitor and adjust resource capacity and consumption to ensure availability is maintained. GIS-3.1.3 The Gaming Enterprise shall monitor its GPE in order to detect, prevent, mitigate, and respond to compile performance reports. GIG1 GIS-3.1.5 The Gaming Enterprise shall establish procedures to gather and analyze threat intelligence, and GIG2	GIS-2.4.10	 decision-making which: a. Produces legal effects the patron such as those which result in the patron being subjected to surveillance by a competent authority; or b. Significantly affects the patron in a similar manner (e.g., it has the potential to influence the 	GIG1
GIS-2.5.2 The collection of sensitive data directly related to each financial transaction within the GPE shall be limited to only the sensitive data strictly needed for the transaction. There shall be processes in place for verifying the protection of sensitive data directly related to each financial transaction within the GPE, including any PII given by the patron or payment related data. GIS-2.5.4 Any communication channels within the GPE conveying financial transaction details shall employ encryption to protect against interception. GIS-3 GPE Operation & Security GIG GIS-3.1.1 Security Procedures The Gaming Enterprise shall monitor the Critical System Components and the transmission of data of the entire GPE, including communication, data packets, networks, applications, as well as the components and data transmissions of any Service Provider services involved, with the objective of ensuring integrity, reliability, and accessibility, as well as to identify anomalous behavior. GIS-3.1.2 The Gaming Enterprise shall monitor and adjust resource capacity and consumption to ensure availability is maintained. GIG2 GIS-3.1.3 The Gaming Enterprise shall monitor its GPE in order to detect, prevent, mitigate, and respond to component components and passive technical attacks and compromises. GIG1 GIS-3.1.5 The Gaming Enterprise shall establish procedures to gather and analyze threat intelligence, and	GIS-2.5	Securing Financial Transactions within the GPE	
be limited to only the sensitive data strictly needed for the transaction. There shall be processes in place for verifying the protection of sensitive data directly related to each financial transaction within the GPE, including any PII given by the patron or payment related data. Any communication channels within the GPE conveying financial transaction details shall employ encryption to protect against interception. GIS-3.1 GPE Operation & Security GIG1 GIS-3.1.1 The Gaming Enterprise shall monitor the Critical System Components and the transmission of data of the entire GPE, including communication, data packets, networks, applications, as well as the components and data transmissions of any Service Provider services involved, with the objective of ensuring integrity, reliability, and accessibility, as well as to identify anomalous behavior. GIS-3.1.2 The Gaming Enterprise shall monitor and adjust resource capacity and consumption to ensure availability is maintained. GIS-3.1.3 The Gaming Enterprise shall maintain a log of the system performance, including a function to compile performance reports. GIG2 GIS-3.1.4 The Gaming Enterprise shall monitor its GPE in order to detect, prevent, mitigate, and respond to common active and passive technical attacks and compromises. GIG3 GIS-3.1.5 The Gaming Enterprise shall establish procedures to gather and analyze threat intelligence, and	GIS-2.5.1	· ·	GIG1
each financial transaction within the GPE, including any PII given by the patron or payment related data. GIS-2.5.4 Any communication channels within the GPE conveying financial transaction details shall employ encryption to protect against interception. GIS-3 GPE Operation & Security GIG GIS-3.1 Security Procedures The Gaming Enterprise shall monitor the Critical System Components and the transmission of data of the entire GPE, including communication, data packets, networks, applications, as well as the components and data transmissions of any Service Provider services involved, with the objective of ensuring integrity, reliability, and accessibility, as well as to identify anomalous behavior. GIS-3.1.2 The Gaming Enterprise shall monitor and adjust resource capacity and consumption to ensure availability is maintained. GIG-3.1.3 The Gaming Enterprise shall maintain a log of the system performance, including a function to compile performance reports. GIG-3.1.4 The Gaming Enterprise shall monitor its GPE in order to detect, prevent, mitigate, and respond to common active and passive technical attacks and compromises. GIG-1 The Gaming Enterprise shall establish procedures to gather and analyze threat intelligence, and GIG-1 GIG-1 The Gaming Enterprise shall establish procedures to gather and analyze threat intelligence, and GIG-1 GIG-1 The Gaming Enterprise shall establish procedures to gather and analyze threat intelligence, and	GIS-2.5.2		GIG1
GIS-3.1.1 encryption to protect against interception. GIS-3 GPE Operation & Security GIG GIS-3.1 Security Procedures The Gaming Enterprise shall monitor the Critical System Components and the transmission of data of the entire GPE, including communication, data packets, networks, applications, as well as the components and data transmissions of any Service Provider services involved, with the objective of ensuring integrity, reliability, and accessibility, as well as to identify anomalous behavior. GIS-3.1.2 The Gaming Enterprise shall monitor and adjust resource capacity and consumption to ensure availability is maintained. GIS-3.1.3 The Gaming Enterprise shall maintain a log of the system performance, including a function to compile performance reports. GIG1 GIS-3.1.4 The Gaming Enterprise shall monitor its GPE in order to detect, prevent, mitigate, and respond to common active and passive technical attacks and compromises. GIG1 GIG2 GIG3 GIG3 GIG3 GIG3 GIG3 GIG4	GIS-2.5.3	each financial transaction within the GPE, including any PII given by the patron or payment related	GIG1
GIS-3.1.1 Security Procedures The Gaming Enterprise shall monitor the Critical System Components and the transmission of data of the entire GPE, including communication, data packets, networks, applications, as well as the components and data transmissions of any Service Provider services involved, with the objective of ensuring integrity, reliability, and accessibility, as well as to identify anomalous behavior. GIS-3.1.2 The Gaming Enterprise shall monitor and adjust resource capacity and consumption to ensure availability is maintained. GIS-3.1.3 The Gaming Enterprise shall maintain a log of the system performance, including a function to compile performance reports. GIG1 GIS-3.1.4 The Gaming Enterprise shall monitor its GPE in order to detect, prevent, mitigate, and respond to common active and passive technical attacks and compromises. GIG1 GIG2 GIG2 GIG3 GIG3 GIG3 GIG3 GIG3 GIG3 GIG3 GIG3	GIS-2.5.4		GIG1
GIS-3.1.1 The Gaming Enterprise shall monitor the Critical System Components and the transmission of data of the entire GPE, including communication, data packets, networks, applications, as well as the components and data transmissions of any Service Provider services involved, with the objective of ensuring integrity, reliability, and accessibility, as well as to identify anomalous behavior. GIS-3.1.2 GIS-3.1.3 The Gaming Enterprise shall monitor and adjust resource capacity and consumption to ensure availability is maintained. GIS-3.1.3 The Gaming Enterprise shall maintain a log of the system performance, including a function to compile performance reports. GIG2 GIS-3.1.4 The Gaming Enterprise shall monitor its GPE in order to detect, prevent, mitigate, and respond to common active and passive technical attacks and compromises. GIG1 GIG2 GIG3	GIS-3	GPE Operation & Security	GIG
GIS-3.1.1 of the entire GPE, including communication, data packets, networks, applications, as well as the components and data transmissions of any Service Provider services involved, with the objective of ensuring integrity, reliability, and accessibility, as well as to identify anomalous behavior. GIS-3.1.2 The Gaming Enterprise shall monitor and adjust resource capacity and consumption to ensure availability is maintained. GIS-3.1.3 The Gaming Enterprise shall maintain a log of the system performance, including a function to compile performance reports. GIG2 GIS-3.1.4 The Gaming Enterprise shall monitor its GPE in order to detect, prevent, mitigate, and respond to common active and passive technical attacks and compromises. GIG1 GIG2 GIG3 GIG3 GIG3 GIG3 GIG3 GIG4 GIG5 GIG6 GIG7	GIS-3.1	Security Procedures	
availability is maintained. GIS-3.1.2 GIS-3.1.3 The Gaming Enterprise shall maintain a log of the system performance, including a function to compile performance reports. GIS-3.1.4 The Gaming Enterprise shall monitor its GPE in order to detect, prevent, mitigate, and respond to common active and passive technical attacks and compromises. GIS-3.1.5 The Gaming Enterprise shall establish procedures to gather and analyze threat intelligence, and GIG2	GIS-3.1.1	of the entire GPE, including communication, data packets, networks, applications, as well as the components and data transmissions of any Service Provider services involved, with the objective of ensuring integrity, reliability, and accessibility, as well as to identify anomalous behavior.	GIG2
GIS-3.1.3 compile performance reports. GIS-3.1.4 The Gaming Enterprise shall monitor its GPE in order to detect, prevent, mitigate, and respond to common active and passive technical attacks and compromises. GIS-3.1.5 The Gaming Enterprise shall establish procedures to gather and analyze threat intelligence, and GIG2	GIS-3.1.2	availability is maintained.	GIG1
GIS-3.1.4 The Gaming Enterprise shall monitor its GPE in order to detect, prevent, mitigate, and respond to common active and passive technical attacks and compromises. GIG1 GIG2 GIG2	GIS-3.1.3	The Gaming Enterprise shall maintain a log of the system performance, including a function to	GIG2
The Gaming Enterprise shall establish procedures to gather and analyze threat intelligence, and	GIS-3.1.4	The Gaming Enterprise shall monitor its GPE in order to detect, prevent, mitigate, and respond to	GIG1
	GIS-3.1.5	The Gaming Enterprise shall establish procedures to gather and analyze threat intelligence, and	GIG2

GIS-3.2	GPE Malfunctions	
GIS-3.2.1	Upon detection of a malfunction, the Gaming Enterprise shall initiate an investigation to determine	GIG1
G13-3.2.1	the root cause of the malfunction.	alai
GIS-3.2.2	The investigation shall involve a thorough review of relevant records, reports, logs, and surveillance records associated with the affected Critical System Component.	GIG1
GIS-3.2.3	Based on the documented findings of the investigation, appropriate actions shall be taken to repair or replace the Critical System Components responsible for the malfunction.	GIG1
GIS-3.2.4	Prior to restoring the Critical System Components to operation, verification activities shall be conducted to ensure its integrity and functionality.	GIG1
GIS-3.2.5	The Gaming Enterprise shall file a malfunction report with the appropriate regulatory body documenting the details of the malfunction.	GIG1
GIS-3.3	GIS Incident Management	
GIS-3.3.1	The Gaming Enterprise shall define, monitor, and document, as well as report, investigate, respond to, and resolve GIS incidents, including detected breaches and suspected or actual hacking or tampering with the GPE.	GIG1
GIS-3.3.2	All GIS incidents shall be responded to within an established time period approved by the regulatory body and formally documented.	GIG1
GIS-3.3.3	In the event of a GIS incident that compromises the security or integrity of sensitive data, the regulatory body, affected users, and other relevant authorities shall be notified. The notification shall include details about the nature of the GIS incident, potential risks, and steps taken to mitigate the impact.	GIG1
GIS-3.3.4	The GIS incident response plan shall include documented procedures to handle various types of GIS incidents.	GIG1
GIS-3.3.5	Procedures shall be established for the controlled recovery from GIS incidents, including restoring affected systems and sensitive data to a known good state.	GIG1
GIS-3.4	Physical Location of Servers	
GIS-3.4.1	The GPE servers, sensitive data, information, and other associated assets shall be housed in one or more secure locations which may be located locally, within a single site or venue, or may be remotely located outside of the site or venue as allowed by the regulatory body.	GIG1
GIS-3.4.2	Each secure location shall have sufficient protection against alteration, tampering or unauthorized access.	GIG1
GIS-3.4.3	Each secure location shall be equipped with a surveillance system that shall meet the procedures put in place by the regulatory body.	GIG1
GIS-3.4.4	Security measures for working in secure locations shall be designed and implemented.	GIG1
GIS-3.4.5	Security perimeters shall be defined and used to protect each secure location.	GIG1
GIS-3.4.6	Each secure location shall be protected by appropriate entry controls to ensure that access is restricted to only authorized personnel. MFA shall be used for physical access unless the secure location is staffed at all times.	GIG1
GIS-3.4.7	Access devices to the secure location, such as magnetic swipe, proximity cards, embedded chip cards, fobs, keys, shall be controlled by authorized personnel.	GIG1
GIS-3.4.8	All attempts at physical access to each secure location shall be recorded in a log, indicating: a. The date and time the access attempt; b. Identification of the individual attempting access; c. Identification of the secure site or venue being accessed; d. Indication on whether or not the access attempt was successful; and e. If the access attempt was successful, the duration of the access.	GIG1
	Each secure location shall be equipped with controls to provide physical protection against damage	
GIS-3.4.9	from fire, flood, and other environmental threats and forms of natural or manmade disaster (e.g., hurricane, earthquake, etc.).	GIG1
GIS-3.4.9	from fire, flood, and other environmental threats and forms of natural or manmade disaster (e.g., hurricane, earthquake, etc.). The GPE shall be protected from power failures and other disruptions caused by failures in supporting utilities.	GIG1
	from fire, flood, and other environmental threats and forms of natural or manmade disaster (e.g., hurricane, earthquake, etc.). The GPE shall be protected from power failures and other disruptions caused by failures in	
GIS-3.4.10	from fire, flood, and other environmental threats and forms of natural or manmade disaster (e.g., hurricane, earthquake, etc.). The GPE shall be protected from power failures and other disruptions caused by failures in supporting utilities. Cables carrying power, data or supporting Critical System Components shall be protected from	GIG1

GIS-3.4.13	Where the server is a stand-alone application, it shall have an Uninterruptible Power Supply (UPS) connected and shall have sufficient capacity to permit a graceful shut-down and that retains all sensitive data during a power loss. It is acceptable that the system may be a component of a network that is supported by a network-wide UPS provided that the server is included as a device protected by the UPS. A surge protection system shall be in use if not incorporated into the UPS itself.	GIG1
GIS-3.5	Logical Access Control	
GIS-3.5.1	The GPE shall be logically secured against unauthorized access by authentication credentials allowed by the regulatory body, such as passwords, MFA, digital certificates, PINs, biometrics, and other access methods.	GIG1
GIS-3.5.2	Each user account shall have their own individual authentication credential whose provision shall be controlled through a formal process.	GIG1
GIS-3.5.3	Users shall only have access to the functionality and features appropriate for their role and responsibilities within the system.	GIG1
GIS-3.5.4	It shall not be possible to modify the critical system parameters of the GPE, including the policies and parameters for operating systems, databases, networks, and applications (e.g., audit settings, password complexity settings, system security levels, manual updates to databases, etc.), without an authorized secure process. Changes to critical system parameters shall be recorded in a log, indicating: a. The date and time of the changes; b. Critical system parameters changed; c. Reason and description of the changes, including initial and final values; and d. User account ID(s) who performed and/or authorized the changes.	GIG1
GIS-3.5.5	The use of generic accounts shall be limited, and where used the reasons for their use shall be formally documented.	GIG1
GIS-3.5.6	Authentication credential records for secret information shall be maintained either manually or by systems that automatically record authentication changes and force authentication credential changes.	GIG1
GIS-3.5.7	Any authentication credentials stored on the system shall be either encrypted or hashed to other authorized cryptographic algorithms.	GIG1
GIS-3.5.8	A fallback method for resetting authentication credentials (e.g., forgotten passwords) shall be at least as strong as the primary method. An MFA process shall be employed for these purposes.	GIG2
GIS-3.5.9	Lost or compromised authentication credentials and authentication credentials of terminated users shall be deactivated, secured, or destroyed as soon as reasonably possible.	GIG1
GIS-3.5.10	The system shall have multiple security access levels to control and restrict different classes of access to the server, including viewing, changing, or deleting critical files and directories. Procedures shall be in place to assign, review, modify, and remove access rights and privileges to each user, including: a. Allowing the administration of user accounts to provide an adequate separation of duties. b. Limiting the users who have the requisite permissions to adjust critical system parameters. c. The enforcement of adequate authentication credential parameters such as minimum length, and expiration intervals.	GIG1
GIS-3.5.11	A Service Provider may, as needed, access the system and its associated components using a guest user account for product and user support or updates/upgrades, as permitted by the regulatory body and the Gaming Enterprise. The guest user accounts shall be: a. Restricted through logical security controls to access only the necessary application(s) and/or database(s) for the product and user support or providing updates/upgrades; b. Continuously monitored by the Gaming Enterprise; and c. Disabled when not in use and immediately after the purpose for which the account was established is no longer required.	GIG1
GIS-3.5.12	Procedures shall be in place to identify and flag suspect user accounts to prevent their unauthorized use, which includes: a. Having system administrator notification and user lockout, after a maximum number of three incorrect attempts at authentication; b. Flagging of suspect accounts where authentication credentials may have been stolen; and c. Invalidating accounts and transferring critical stored account information into a new account.	GIG1

GIS-3.5.13	Any logical access attempts to the system applications or operating systems shall be recorded in a log, indicating: a. The date and time the access attempt; b. User account ID; c. IP Address of the individual attempting access; d. Indication on whether or not the access attempt was successful; and e. If the access attempt was successful, the duration of the access.	GIG1
GIS-3.5.14	The use of utility programs which can override application or operating system controls shall be restricted and tightly controlled.	GIG1
GIS-3.5.15	System voids, overrides, corrections, or any other activities requiring user intervention and occurring outside of the normal scope of system operation shall be recorded in a log, indicating: a. The date and time of the activities; b. Components affected by the activities; c. Reason and description of the activities, including initial and final values; and d. User account ID(s) who performed and/or authorized the activities.	GIG1
GIS-3.5.16	For each user account, the information to be maintained and backed up by the GPE shall include: a. User account ID; b. Individual name and title or position; c. Full list and description of functions that each group or user account may execute; d. The date and time the account was created; e. The date and time of last access, including IP Address; f. The date and time of last password change; g. The date and time the account was disabled/deactivated; h. Description of the access rights or group membership of the account, if applicable; and i. The current and previous statuses of the user account (e.g., active, inactive, closed, suspended, etc.).	GIG1
GIS-3.5.17	Only authorized personnel may have access to inactive or closed user accounts.	GIG1
GIS-3.6	User Authentication and Authorization	
GIS-3.6.1	A secure and controlled mechanism shall be employed that can verify that the Critical System Component is being accessed by authorized personnel on demand and on a regular basis as required by the regulatory body.	GIG1
GIS-3.6.2	Active sessions shall be terminated if user authorization has exceeded a configurable number of failed attempts.	GIG1
GIS-3.6.3	When used, automated equipment identification methods to authenticate connections from specific locations and equipment shall be documented and shall be included in the review of access rights and privileges.	GIG2
GIS-3.6.4	Any authorization information communicated by the system for identification purposes shall be obtained at the time of the request from the system and not be stored on the system component.	GIG2
GIS-3.6.5	Where user sessions are tracked for authorization, the user session authorization information shall always be created randomly, in memory, and shall be removed after the user's session has ended.	GIG2
GIS-3.6.6	Restrictions on connection times such as but not necessarily limited to session timeouts shall be used to provide additional security for high-risk applications, such as remote access.	GIG1
GIS-3.6.7	If the system does not receive input from the individual within five minutes, or a period specified by the regulatory body, the user session shall time out or lock up, requiring the personnel to reestablish their authorization to continue.	GIG1
GIS-3.7	Server Programming	
GIS-3.7.1	The GPE shall be sufficiently secure to prevent any user-initiated programming capabilities on the server that may result in modifications to the database. However, it is acceptable for network or system administrators to perform authorized network infrastructure maintenance or application	GIG1
	troubleshooting with sufficient access rights.	
GIS-3.7.2	·	GIG2
GIS-3.7.2 GIS-3.8	troubleshooting with sufficient access rights. The server shall also be protected from the unauthorized execution of mobile code. This includes preventing the execution of potentially harmful code that may be introduced through mobile devices	GIG2
	troubleshooting with sufficient access rights. The server shall also be protected from the unauthorized execution of mobile code. This includes preventing the execution of potentially harmful code that may be introduced through mobile devices or other external sources.	GIG2

GIS-3.8.2	Each server instance may perform only one function.	GIG2
GIS-3.9	Electronic Document Retention System (ERDS)	
GIS-3.9.1	The ERDS shall be properly configured to maintain the original version along with all subsequent versions reflecting all changes to reports or logs that are stored in an alterable format.	GIG1
GIS-3.9.2	The ERDS shall maintain a unique signature for each version of the log, including the original.	GIG1
GIS-3.9.3	The ERDS shall retain a log of changes to all reports including the user account ID performed the changes, the date and time the changes occurred, and what was changed.	GIG1
GIS-3.9.4	The ERDS shall provide a method of complete indexing for easily locating and identifying the log including at least the following (which may be input by the user): a. Date and time the log was generated; b. Critical system component generating the log; c. Title and description of the log; d. User account ID of who is generating the log; and e. Any other information that may be useful in identifying the log and its purpose.	GIG1
GIS-3.9.5	The ERDS shall be configured to a. Limit access to modify or add reports or logs to the system through logical security of specific user accounts; and b. Provide a log of all administrative user account activity.	GIG1
GIS-3.9.6	The ERDS shall be properly secured using physical and logical security measures (user accounts with appropriate access, proper levels of event logging, and document the version control, etc.).	GIG1
GIS-3.9.7	The ERDS shall be equipped to prevent disruption of log availability and loss of data through hardware and software redundancy best practices, and backup processes.	GIG1
GIS-4	Data Integrity	GIG
GIS-4.1	Sensitive Data Management	
GIS-4.1.1	The Gaming Enterprise shall provide a layered approach to GPE security to ensure secure storage and processing of sensitive data using reasonable protection methods.	GIG1
GIS-4.1.2	Appropriate data handling methods shall be implemented, including validation of input and rejection of corrupt sensitive data.	GIG2
GIS-4.1.3	The number of workstations where critical applications or associated databases may be accessed shall be limited.	GIG1
GIS-4.1.4	Encryption or equivalent security shall be used for files and directories containing sensitive data. If encryption is not used, the Gaming Enterprise shall restrict users from viewing the contents of such files and directories, which at a minimum shall provide for the segregation of system duties and responsibilities as well as the monitoring and recording of access by any person to such files and directories.	GIG2
GIS-4.1.5	Alterations to the GPE's live data files and database tables occurring outside of normal program and operating system execution shall be recorded in a log, indicating: a. The date and time of the alterations; b. The live data files and database tables affected by the alterations; c. Reason and description of the alterations, including live data files and database tables before and after the alterations; and d. User account ID(s) who performed and/or authorized the alteration.	GIG1
GIS-4.1.6	The GPE shall provide a logical means for securing and protecting sensitive data against alteration, tampering, or unauthorized access, both external and internal.	GIG1
GIS-4.1.7	The normal operation of any Critical System Component that holds sensitive data shall not have any options or mechanisms that may compromise the sensitive data.	GIG1
GIS-4.1.8	No Critical System Components may have a mechanism whereby an error will cause the sensitive data to automatically clear.	GIG1
GIS-4.1.9	Any Critical System Component that holds sensitive data in its memory shall not allow removal of the information unless it has first transferred that information to the associated database or other secured component(s) of the system.	GIG1
GIS-4.1.10	The Gaming Enterprise shall protect the confidentiality, integrity, accountability, and availability of sensitive data, when held at-rest on servers, critical applications, and associated databases containing sensitive data.	GIG2

GIS-4.1.11	Encryption shall be applied to protect the confidentiality, integrity, accountability, and availability of sensitive data when it's in use, when it's stored on portable computer systems (e.g. laptops, USB		
GIS-4.1.12	devices, etc.), and when it's held at-rest on workstations. Sensitive data that is not required to be hidden but shall be authenticated shall use some form of message authentication technique.	GIG2	
GIS-4.1.13	Authentication shall use a security certificate from an approved Gaming Enterprise, containing information about whom it belongs to, who it was issued by, valid dates, a unique serial number or other unique identification that can be used to verify the contents of the certificate.	GIG1	
GIS-4.1.14	Production databases containing sensitive data shall reside on networks separated from the servers hosting any patron interfaces.	GIG1	
GIS-4.1.15	Sensitive data shall be maintained at all times regardless of whether the server is being supplied with power.	GIG1	
GIS-4.1.16	Sensitive data leakage prevention measures shall be applied to systems, networks and any other devices that process, store, or transmit sensitive data.	GIG2	
GIS-4.1.17	Sensitive data shall be stored in such a way as to prevent the loss of the data when replacing parts or modules during normal maintenance.	GIG1	
GIS-4.1.18	The alteration of any sensitive data shall not be permitted without supervised access controls. In the event any sensitive data is changed, the following information shall be documented or logged: a. The date and time of the alteration; b. Identification of the sensitive data altered; c. Reason and description of the sensitive data alteration, including initial and final values; and d. User account ID(s) who performed and/or authorized the alteration.	GIG1	
GIS-4.1.19	Any irrecoverable loss of sensitive data shall be recorded in a log, indicating; a. The date and time of the loss; b. Identification of the sensitive data lost; and c. Reason and description of the sensitive data lost.	GIG1	
GIS-4.2	Backup Process Implementation		
GIS-4.2.1	Backup process implementation shall occur at least daily or as otherwise specified by the regulatory body, although all methods will be reviewed on a case-by-case basis.	GIG1	
GIS-4.2.2	Sensitive data, critical applications, and associated databases shall be backed up with immutability safeguards to prevent alterations or deletions, ensuring GPE integrity.	GIG1	
GIS-4.2.3	Mirrored or redundant copies of sensitive data shall be kept on the GPE with open support for backups and restoration.	GIG1	
GIS-4.2.4	The backup shall be contained on a non-volatile physical medium, or an equivalent architectural implementation.	GIG1	
GIS-4.2.5	If HHDs are used as backup storage, data integrity shall be assured in the event of a disk failure.	GIG1	
GIS-4.2.6	Upon completion of the backup process, the backup storage is immediately transferred to a storage location physically separate from the location housing the servers and sensitive data being backed up (for temporary and permanent storage).	GIG1	
GIS-4.2.7	The backup storage location shall be secured to prevent unauthorized access and provides adequate protection to prevent the permanent loss of any sensitive data.	GIG1	
GIS-4.2.8	If the backup is stored in a cloud platform, another copy may be stored in a different cloud platform or region.	GIG2	
GIS-4.2.9	Backup data files and data recovery components shall be managed with at least the same level of security and access controls as the GPE.	GIG1	
GIS-4.2.10	Backup data files and data recovery components shall be maintained, protected, and regularly tested in accordance with the agreed backup process.	GIG2	
GIS-4.3	System Failure and Recovery		
GIS-4.3.1	Failure or significant periods of unavailability of a Critical System Component (any length of time operations is halted for all users, and/or transactions cannot be successfully completed for any user) shall be recorded in a log, indicating; a. Identification of the unavailable component; b. The date and time the component became unavailable; and c. Reason and description of the component unavailability; d. The date and time the component became available again.	GIG1	

GIS-4.3.2	The GPE shall have sufficient redundancy and modularity so that if any single Critical System Component or part of a component fails, the functions of the GPE and the process of auditing	GIG1
GIS-4.3.3	those functions can continue with no loss or corruption of sensitive data. When two or more Critical System Components are linked a procedure shall be in place for the components to be tested after installation but prior to use in a GPE.	GIG1
GIS-4.3.4	The process of all gaming operations between the Critical System Components shall not be adversely affected by restart or recovery of either component (e.g., transactions are not to be lost or duplicated because of recovery of one component or the other).	GIG1
GIS-4.3.5	Upon restart or recovery, the Critical System Components shall immediately synchronize the status of all transactions, sensitive data, and configurations with one another.	GIG1
GIS-4.3.6	The Gaming Enterprise shall be able to identify and properly handle the situation where a master reset has occurred on any Critical System Component.	GIG1
GIS-4.4	Business Continuity and Disaster Recovery Plan	
GIS-4.4.1	A business continuity and disaster recovery plan shall be in place to recover gaming operations if the GPE is rendered inoperable, including, but not limited to: a. Data backup restoration; b. Program restoration; and c. Redundant or backup hardware restoration.	GIG1
GIS-4.4.2	The business continuity and disaster recovery plan shall consider disasters including, but not limited to, those caused by weather, water, flood, fire, environmental spills and accidents, malicious destruction, acts of terrorism or war, and contingencies such as strikes, epidemics, pandemics, etc.	GIG1
GIS-4.4.3	The business continuity and disaster recovery plan shall address the method of storing sensitive data to minimize loss. If asynchronous replication is used, the method for recovering information shall be described or the potential loss of information shall be documented.	GIG2
GIS-4.4.4	The business continuity and disaster recovery plan shall delineate the circumstances under which it will be invoked.	GIG1
GIS-4.4.5	The business continuity and disaster recovery plan shall address the establishment of a recovery site physically separated from the production site. The distance between the two locations should be determined based on potential environmental threats and hazards, power failures, and other disruptions but should also consider the potential difficulty of data replication as well as being able to access the recovery site within a reasonable time (Recovery Time Objective). Utilization of cloud platforms for this purpose will be evaluated on a case-by-case basis.	GIG2
GIS-4.4.6	The business continuity and disaster recovery plan shall contain recovery guides detailing the technical steps required to re-establish gaming functionality at the recovery site.	GIG1
GIS-4.4.7	The business continuity and disaster recovery plan shall address the processes required to resume administrative operations of gaming activities after the activation of the recovered system for a range of scenarios appropriate for the operational context of the system.	GIG1
GIS-4.4.8	The business continuity and disaster recovery plan shall be tested at least annually or as otherwise specified by the regulatory body. The results of the testing shall be documented.	GIG1
GIS-5	Communications	GIG
GIS-5.1	Connectivity	
GIS-5.1.1	Only authorized devices shall be permitted to establish communications between any Critical System Components.	GIG1
GIS-5.1.2	 The GPE shall provide a method to a. Perform mutual authentication to ensure that authorized devices only communicate with valid networks; b. Enroll and un-enroll Critical System Components; and c. Enable and disable specific Critical System Components. 	GIG1
GIS-5.1.3	Only enrolled and enabled Critical System Components may participate in gaming operations.	GIG1
GIS-5.1.4	The default condition for Critical System Components shall be un-enrolled and disabled.	GIG1
GIS-5.1.5	The GPE shall log the establishment, loss, and reestablishment of communications between Critical System Components.	GIG1

GIS-5.2	Communication Protocol			
GIS-5.2.1	Each Critical System Component of the GPE shall function as indicated by a documented secure			
GIS-5.2.2	communication protocol. All protocols shall use communication techniques that have proper error detection and recovery mechanisms, which are designed to prevent intrusion, interference, eavesdropping, unauthorized alterations, and tampering. Any alternative implementations will be reviewed on a case-by-case basis and approved by the regulatory body.			
GIS-5.2.3	All critical communications of sensitive data shall employ encryption and authentication for integrity.	GIG1		
GIS-5.2.4	Communications on the secure network shall only be possible between authorized Critical System Components that have been enrolled and authenticated as valid on the network. No unauthorized communications to components and/or access points shall be allowed.	GIG1		
GIS-5.2.5	Communications shall be hardened to be immune to all possible malformed message attacks.	GIG1		
GIS-5.2.6	Failure of communications shall not affect the integrity of sensitive data.	GIG1		
GIS-5.2.7	After a system interruption or shutdown, communication with all Critical System Components necessary for GPE operation shall not be established and authenticated until the program resumption routine, including any self-tests, is completed successfully.	GIG1		
GIS-5.3	Encrypted Tunneling Protocols	1		
GIS-5.3.1	One of the following encrypted tunneling protocols or equivalent shall be utilized to secure communication of all sensitive data over the WLAN: a. Protected Extensible Authentication Protocol (Protected EAP or PEAP); b. Extensible Authentication Protocol - Transport Layer Security (EAP-TLS); c. Extensible Authentication Protocol - Tunneled Transport Layer Security (EAP-TTLS); d. Virtual Private Network (VPN) with L2TP/IPsec; e. Point to Point Tunneling Protocol (PPTP); or f. Secure Sockets Layer (SSL).	GIG1		
GIS-5.3.2	The encrypted tunneling protocols shall be authenticated against Lightweight Directory Access Protocol (LDAP), Remote Authentication Dial In User Service (RADIUS), Kerberos or Microsoft Active Directory servers or equivalent, as well as local databases stored on the secure gateway controller.	GIG1		
GIS-5.4	Communications Over Internet/Public Networks			
GIS-5.4.1	Communications between any Critical System Components which takes place over internet/public networks, shall be protected from fraudulent activity, contract dispute, and unauthorized disclosure and modification by encrypting the data packets or by utilizing a secure communications protocol to ensure the confidentiality and integrity of the transmission.	GIG1		
GIS-5.4.2	Sensitive data shall always be encrypted over the internet/public network and safeguarded from incomplete transmissions, misrouting, unauthorized message modification, disclosure, duplication, or replay.	GIG1		
GIS-5.5	Wireless Local Area Network (WLAN) Communications			
GIS-5.5.1	Use of WLAN communications shall be secured and only used where appropriate and not in areas where it could be potentially harmful.	GIG1		
GIS-5.5.2	Communications between wireless devices on the WLAN shall use protocols designed for securing, authenticating, and encrypting wireless networks.	GIG1		
GIS-5.5.3	Multi-Factor Authentication (MFA) shall be required at the wireless network and device level.	GIG1		
GIS-5.5.4	Authentication schemes using Public Key Infrastructure (PKI) shall require certificate validation, ideally in both directions (e.g. client certificates).	GIG1		
GIS-5.5.5	Advance Encryption Standards (AES) or equivalent with a minimum of 256-bit encryption shall be used to support integrity and confidentiality services.	GIG1		
GIS-5.5.6	The Pairwise Master Key (PMK) utilized shall have a lifetime of twenty-four hours or less. Alternatively, it is acceptable for the PMK to be changed during pre-scheduled maintenance downtime in accordance with the controls adopted by the Gaming Enterprise.	GIG1		
GIS-5.5.7	The Group Master Key (GMK) utilized shall have a lifetime of eight hours or less.	GIG1		

	Wired Equivalent Privacy (WEP) shall not be used. If it is not possible for the GPE to use the WPA2			
GIS-5.5.8	protocol, the implementation of WEP as a secure encryption and authentication method will be			
	considered on a case-by-case basis.			
GIS-5.6	Wireless Access Points (WAP)			
GIS-5.6.1	A WAP allows wireless devices to connect to a wired network using wireless transport (e.g. Wi-Fi)	GIG1		
GIS-5.6.1	and relay data between the wireless device(s) and the rest of the network.	GIGT		
GIS-5.6.2	The default administration login and password shall be changed from the factory default to a secure	GIG1		
GIS-3.0.2	value controlled according to the Gaming Enterprise.	GIGT		
GIS-5.6.3	The default network password shall be changed from the factory default to a secure value	GIG1		
GIO-3.0.3	controlled according to the Gaming Enterprise.	aiai		
GIS-5.6.4	The SSID shall be changed from the factory default to a secure value which does not contain any	GIG1		
GIO 0.0.4	reference to the site name, manufacturer, or any other reference that could be easily discerned.	a.a.		
	Access to the administrative functions of the WAP shall be restricted to connections from the wired			
GIS-5.6.5	side of the network utilizing a secure protocol with a privileged user account defined by the Gaming	GIG1		
	Enterprise.			
GIS-5.6.6	If the router supports WPA2 authentication, all WAPs shall be IEEE 802.11 compliant and	GIG1		
	configured with Enterprise Mode enabled or with a strong pre-shared key.			
GIS-5.7	Network Communication Equipment (NCE)			
GIS-5.7.1	The Gaming Enterprise shall provide a secure location for the placement, operation, and usage of	GIG1		
<u> </u>	NCE.	G.G.		
GIS-5.7.2	NCE shall be installed according to a defined plan and records of all installed NCE shall be	GIG1		
	maintained.			
GIS-5.7.3	NCE shall be constructed in such a way as to be resistant to physical damage to the hardware or	GIG1		
010.5.7.4	corruption of the contained software by normal usage.	0104		
GIS-5.7.4	NCE shall be physically secured from unauthorized access.	GIG1		
GIS-5.7.5	GPE communications via NCE shall be logically secured from unauthorized access.	GIG1		
GIS-5.7.6	NCE with limited onboard storage shall, if the audit log becomes full, disable all communication or	GIG1		
alo-3.7.0	offload logs to a dedicated log server.	GIGT		
GIS-5.8	Intrusion Detection System/Intrusion Prevention System (IDS/IPS)			
	An IDS/IPS shall be installed which includes one or more components that can listen to both			
	internal and external communications as well as detect or prevent:			
	a. Distributed Denial of Service (DDOS) attacks;			
GIS-5.8.1	b. Shellcode from traversing the network;	GIG1		
	c. Address Resolution Protocol (ARP) spoofing; and			
	d. Other "Man-In-The-Middle" attack indicators and sever communications immediately if			
	detected.			
GIS-5.8.2	The IDS/IPS shall scan the network for any unauthorized or rogue access points or devices	GIG2		
GIS-3.0.2	connected to any access point on the network at least quarterly or as otherwise specified by the regulatory body.	GIGZ		
GIS-5.8.3	, , , , , , , , , , , , , , , , , , ,	GIG2		
GIO-0.8.3	The IDS/IPS shall automatically disable any unauthorized or rogue devices connected to the GPE.	GIGZ		
	The IDS/IPS shall maintain an access log which shall:			
CIC-E 0 /	a. Contain complete and comprehensive information about all devices involved, including the	GIG1		
GIS-5.8.4	time and date, the name, and the hardware identifier of all devices requesting access to the	GIG1		
GIS-5.8.4	time and date, the name, and the hardware identifier of all devices requesting access to the network; and	GIG1		
	time and date, the name, and the hardware identifier of all devices requesting access to the network; and b. Be able to be reconciled with all other networking devices within the GPE.	GIG1		
GIS-5.8.4 GIS-5.9	time and date, the name, and the hardware identifier of all devices requesting access to the network; and b. Be able to be reconciled with all other networking devices within the GPE. Network Security Management			
	time and date, the name, and the hardware identifier of all devices requesting access to the network; and b. Be able to be reconciled with all other networking devices within the GPE. Network Security Management The Gaming Enterprise shall review and update policies and procedures to ensure the network is	GIG1		
GIS-5.9 GIS-5.9.1	time and date, the name, and the hardware identifier of all devices requesting access to the network; and b. Be able to be reconciled with all other networking devices within the GPE. Network Security Management The Gaming Enterprise shall review and update policies and procedures to ensure the network is secure and threats and vulnerabilities are addressed accordingly.	GIG1		
GIS-5.9	time and date, the name, and the hardware identifier of all devices requesting access to the network; and b. Be able to be reconciled with all other networking devices within the GPE. Network Security Management The Gaming Enterprise shall review and update policies and procedures to ensure the network is secure and threats and vulnerabilities are addressed accordingly. Networks shall be logically separated such that there should be no network traffic on a network link			
GIS-5.9 GIS-5.9.1 GIS-5.9.2	time and date, the name, and the hardware identifier of all devices requesting access to the network; and b. Be able to be reconciled with all other networking devices within the GPE. Network Security Management The Gaming Enterprise shall review and update policies and procedures to ensure the network is secure and threats and vulnerabilities are addressed accordingly. Networks shall be logically separated such that there should be no network traffic on a network link which cannot be serviced by hosts on that link.	GIG1		
GIS-5.9 GIS-5.9.1	time and date, the name, and the hardware identifier of all devices requesting access to the network; and b. Be able to be reconciled with all other networking devices within the GPE. Network Security Management The Gaming Enterprise shall review and update policies and procedures to ensure the network is secure and threats and vulnerabilities are addressed accordingly. Networks shall be logically separated such that there should be no network traffic on a network link which cannot be serviced by hosts on that link. All network management functions shall authenticate all users on the network and encrypt all	GIG1		
GIS-5.9 GIS-5.9.1 GIS-5.9.2	time and date, the name, and the hardware identifier of all devices requesting access to the network; and b. Be able to be reconciled with all other networking devices within the GPE. Network Security Management The Gaming Enterprise shall review and update policies and procedures to ensure the network is secure and threats and vulnerabilities are addressed accordingly. Networks shall be logically separated such that there should be no network traffic on a network link which cannot be serviced by hosts on that link.	GIG1		

GIS-5.9.5	All entry and exit points to the network shall be identified, managed, controlled, and monitored on a 24/7 basis.	GIG2
GIS-5.9.6	All network hubs, services and connection ports shall be secured to prevent unauthorized access to the network.	GIG1
GIS-5.9.7	Unused services and non-essential ports shall be either physically blocked or software disabled whenever possible.	GIG1
GIS-5.9.8	Stateless protocols, such as UDP (User Datagram Protocol), shall not be used for sensitive data without stateful transport. Note that although HTTP (Hypertext Transport Protocol) is technically stateless, if it runs on TCP (Transmission Control Protocol) which is stateful, this is allowed.	GIG1
GIS-5.9.9	All changes to network infrastructure shall be recorded in a log, indicating: a. The date and time of the changes; b. Reason and description of the changes, including initial and final values; and c. User account ID(s) who performed and/or authorized the changes.	GIG1
GIS-5.10	Telecommuting and Mobile Computing	
GIS-5.10.1	Telecommuting shall not be permitted except under circumstances where the security of the endpoint can be guaranteed.	GIG1
GIS-5.10.2	A formal policy shall be in place, and supporting security measures shall be adopted to protect against the risks of using mobile computing and communication facilities.	GIG1
GIS-6	Service Providers	GIG
GIS-6.1	Service Provider Relationships	<u> </u>
GIS-6.1.1	The allocation of responsibility between a Service Provider and the Gaming Enterprise for managing security controls does not exempt a Gaming Enterprise from the responsibly of ensuring that sensitive data is properly secured according to the applicable requirements.	GIG1
GIS-6.1.2	Clear policies and procedures shall be agreed between the Service Provider and the Gaming Enterprise for all security requirements, and responsibilities for operation, management and reporting shall be clearly defined and understood for each applicable requirement.	GIG2
GIS-6.1.3	Where sensitive data is shared with Service Providers, formal data processing agreements shall be in place that states the rights and obligations of each party concerning the protection of the sensitive data, including: a. The subject matter and duration of the processing; b. The nature and purpose of the processing; c. The type of data to be processed; d. How the data is stored; e. The detail of the security surrounding the data; f. The means used to transfer the data from one Gaming Enterprise to another; g. The means used to retrieve data about certain individuals; h. The method for ensuring a retention schedule is adhered to; i. The means used to delete or dispose of the data; and j. The categories of data.	GIG2
GIS-6.2	Service Provider Communications	
GIS-6.2.1	The GPE shall be capable of securely communicating with Service Providers using encryption and strong authentication.	GIG1
GIS-6.2.2	All login events involving Service Providers shall be recorded in an audit file.	GIG1
GIS-6.2.3	Communication with Service Providers shall not interfere with or degrade normal GPE functions.	GIG1
GIS-6.2.4	Service Provider data shall not affect patron communications.	GIG1
GIS-6.2.5	Service Providers shall be on a segmented network separate from network segments hosting patron connections.	GIG1
GIS-6.2.6	Gaming shall be disabled on all network connections except for those within the GPE.	GIG1
GIS-6.2.7	The GPE shall not route data packets from Service Providers directly to the GPE and vice-versa.	GIG1
GIS-6.2.8	The GPE shall not act as IP routers between the GPE and Service Providers.	GIG1
GIS-6.2.9	Unauthorized Service Providers shall be prevented from viewing or altering sensitive data.	GIG1

GIS-7	Technical Controls	GIG
GIS-7.1	Domain Name Service (DNS) Requirements	
GIS-7.1.1	The Gaming Enterprise shall utilize a secure primary DNS server and a secure secondary DNS server which are logically and physically separate from one another, enhancing resilience against single points of failure and potential attacks.	GIG2
GIS-7.1.2	The primary DNS server shall be physically located in a secure data center or a virtualized host in an appropriately secured hypervisor or equivalent to prevent unauthorized access.	GIG2
GIS-7.1.3	Logical and physical access to the DNS servers shall be restricted to authorized personnel through Multi-Factor Authentication (MFA), ensuring that only authenticated users can access the DNS servers and that DNS records are kept secure from malicious and unauthorized changes.	GIG2
GIS-7.1.4	Zone transfers to arbitrary hosts shall be disallowed. This restriction prevents unauthorized parties from accessing or replicating DNS zone data, reducing the risk of data exposure or manipulation.	GIG2
GIS-7.1.5	A method to prevent cache poisoning, such as DNS Security Extensions (DNSSEC), is required.	GIG2
GIS-7.1.6	Registry lock shall be in place, so any request to change DNS server(s) will need to be verified manually.	GIG2
GIS-7.2	Cryptographic Controls	
GIS-7.2.1	A policy on the use of cryptographic controls for the protection of sensitive data shall be developed and implemented, ensuring that all cryptographic controls utilize cryptographic modules for secure execution and protection.	GIG1
GIS-7.2.2	The grade of encryption used shall be appropriate to the sensitivity of the data.	GIG1
GIS-7.2.3	The use of encryption methods shall be reviewed periodically to verify that the current encryption algorithms and key lengths are secure.	GIG1
GIS-7.2.4	The encryption method shall include the use of different encryption keys so that encryption algorithms can be changed or replaced to correct weaknesses as soon as practical. Other methodologies shall be reviewed on a case-by-case basis.	GIG1
GIS-7.2.5	The management of encryption keys throughout their whole lifecycle shall follow defined processes established by the Gaming Enterprise.	GIG1
GIS-7.2.6	The Gaming Enterprise shall establish procedures for obtaining or generating encryption keys, ensuring that only authorized personnel are involved in the process.	GIG1
GIS-7.2.7	Encryption keys shall be stored on a secure and redundant storage medium after being encrypted themselves through a different encryption method and/or by using a different encryption key.	GIG1
GIS-7.2.8	Procedures shall be established to monitor the expiration dates of encryption keys, where applicable.	GIG1
GIS-7.2.9	Procedures shall be defined for promptly revoking encryption keys in the event of compromise, loss, or unauthorized access.	GIG1
GIS-7.2.10	Procedures shall be established for securely changing the current encryption keyset, including the generation of new keys and the retirement of old keys.	GIG1
GIS-7.2.11	The Gaming Enterprise shall implement procedures for recovering data secured with revoked or expired encryption keys for a defined period after the keys become invalid.	GIG1
GIS-7.3	Critical System Component Hardening	
GIS-7.3.1	Critical system component configurations shall be established, documented, implemented, monitored, and reviewed.	GIG1
GIS-7.3.2	Configuration procedures for Critical System Components shall address all known security vulnerabilities and be consistent with industry-accepted best practices for system hardening.	GIG1
GIS-7.3.3	The appropriateness and effectiveness of steps taken to harden Critical System Components shall be regularly assessed and, if appropriate, changes shall be made to improve the hardening.	GIG2
GIS-7.3.4	All default or standard configuration parameters shall be removed from all Critical System Components where a security risk is presented.	GIG1
GIS-7.3.5	Only one primary function shall be implemented per server to prevent functions that require different security levels from co-existing on the same server.	GIG1
GIS-7.3.6	Additional security features shall be implemented for any required services, protocols or daemons that are considered to be insecure.	GIG1
GIS-7.3.7	System security parameters shall be configured to prevent misuse.	GIG1

GIS-7.3.8	All unnecessary functionalities shall be removed, such as scripts, drivers, features, subsystems, file systems, and unnecessary web servers.	GIG1
GIS-7.4	Generation and Storage of Logs	
GIS-7.4.1	There shall be procedures established and documented to centrally monitor, manage, and respond to user activities, exceptions, faults, and adverse events.	GIG2
GIS-7.4.2	Security reports or logs shall be predefined and generated on each Critical System Component to monitor and rectify anomalies, flaws, and alerts.	GIG1
GIS-7.4.3	Security reports or logs shall be protected against tampering and unauthorized access.	GIG2
GIS-7.4.4	Security reports or logs shall be regularly reviewed as required by the Gaming Enterprise and/or the regulatory body.	GIG1
GIS-8	Remote Access and Firewalls	GIG
GIS-8.1	Remote Access Security	
GIS-8.1.1	Remote access security will be reviewed on a case-by-case basis, in conjunction with the implementation of the current technology and approval from the regulatory body.	GIG1
GIS-8.1.2	Remote access methods shall be appropriately secured and managed.	GIG1
GIS-8.1.3	The GPE shall have the ability to enable or disable remote access, and the default state shall be set to disabled	GIG1
GIS-8.1.4	Remote access shall accept only the remote connections permissible by the firewall application and system settings.	GIG1
GIS-8.1.5	Remote access shall be limited to only the application functions necessary for users to perform their job duties.	GIG1
GIS-8.1.6	No unauthorized remote user administration functionality (adding users, changing permissions, etc.) is permitted.	GIG1
GIS-8.1.7	Unauthorized remote access to the operating system or to any database other than information retrieval using existing functions is prohibited. The GPE shall maintain an activity log depicting all remote access information. Remote access	GIG1
GIS-8.1.8	 logs shall minimally include the following: a. User account ID(s) who performed and/or authorized the remote access, including verification of authorization; b. Remote IP Addresses, Port Numbers, Protocols, and where possible, MAC Addresses; c. Time and date the connection was made and duration of connection; d. Reason for remote access and description of work to be performed; e. Activity while logged in, including the specific areas accessed and changes made. 	GIG1
GIS-8.2	Firewall Security	
GIS-8.2.1	All communications, including remote access, shall pass through at least one approved application-level firewall. This includes connections to and from any non-system hosts used by the Gaming Enterprise.	GIG1
GIS-8.2.2	The firewall shall be located at the boundary of any two dissimilar security domains.	GIG1
GIS-8.2.3	A device in the same broadcast domain as the system host shall not have a facility that allows an alternate network path to be established that bypasses the firewall.	GIG2
GIS-8.2.4	Any alternate network path existing for redundancy purposes shall also pass through at least one application-level firewall.	GIG1
GIS-8.2.5	Only firewall-related applications may reside on the firewall.	GIG1
GIS-8.2.6	The user accounts on the firewall shall be limited (e.g., network or system administrators only).	GIG1
GIS-8.2.7	The firewall shall reject all connections except those that have been specifically approved.	GIG1
GIS-8.2.8	The firewall shall reject all connections from destinations which cannot reside on the network from which the message originated (e.g., RFC1918 addresses on the public side of an internet firewall).	GIG1
GIS-8.2.9	The firewall shall only allow remote access using encryption.	GIG1
GIS-8.2.10	The firewall shall be able to log audit information in a manner to preserve and secure the information from loss or alteration. This information includes the following: a. All changes to configuration of the firewall; b. All successful and unsuccessful connection attempts through the firewall; and c. The source and destination IP Addresses, Port Numbers, Protocols, and MAC Addresses.	GIG1

	For unaugocooful connection attempts through the firewall a configurable nerometer may be	
GIS-8.2.11	For unsuccessful connection attempts through the firewall, a configurable parameter may be utilized to deny further connection requests, and notify the system administrator, should the	GIG1
GIO GIZITI	predefined threshold be exceeded.	G.G.
GIS-9	Critical Asset and Change Management Review	GIG
GIS-9.1	Asset Management	
GIS-9.1.1	All physical or logical assets housing, processing, or communicating sensitive data, including those comprising the GPE, shall be accounted for.	GIG1
GIS-9.1.2	Procedures shall exist for adding new assets and removing assets from service.	GIG1
GIS-9.1.3	A policy shall be included on the acceptable use of assets associated with the GPE.	GIG1
GIS-9.1.4	The designated owner of each asset shall: a. Ensure that information and assets are appropriately classified based on their confidentiality, integrity, accountability, and availability requirements; and b. Define access restrictions and classifications based on the established classification criteria and the principle of least privilege.	GIG1
GIS-9.1.5	A procedure shall exist to ensure that recorded accountability for assets is compared with actual assets at least annually or at intervals required by the regulatory body and appropriate action is taken with respect to discrepancies.	GIG1
GIS-9.1.6	Copy protection to prevent unauthorized duplication or modification of licensed software may be implemented provided that: a. The method of copy protection is fully documented and verified that the protection works as described; or b. The program or component involved in enforcing the copy protection can be individually verified by the methodology approved by the regulatory body.	GIG1
GIS-9.1.7	To ensure its continued availability integrity, and confidentiality of information, assets shall be correctly maintained, inspected, and serviced at regular intervals to ensure that it is free from defects or mechanisms that could interfere with its operation.	GIG1
GIS-9.1.8	Storage media shall be managed through their lifecycle of acquisition, use, transportation, and disposal in accordance with the Gaming Enterprise's classification scheme and handling requirements.	GIG1
GIS-9.1.9	Assets shall be disposed of securely and safely using documented procedures.	GIG1
GIS-9.1.10	Sensitive data stored in Critical System Components, devices or in any other storage media shall be deleted when no longer required.	GIG1
GIS-9.1.11	Prior to disposal or re-use, assets containing storage media shall be checked to ensure that any licensed software, as well as sensitive data has been removed or securely overwritten.	GIG1
GIS-9.2	Critical Asset Register (CAR)	
GIS-9.2.1	A CAR shall be developed and maintained for any assets that affect the functionality of the GPE or has an influence on how sensitive data is stored/handled by the environment.	GIG1
GIS-9.2.2	The structure of the CAR shall include hardware and software components and the inter- relationships and dependencies of the components.	GIG1
GIS-9.2.3	The following minimum items shall be documented in the CAR for each asset: a. A unique ID that is assigned to each individual asset; b. The name/definition of each asset; c. A version number of the asset listed; d. Identifying asset characteristics (e.g., system component, database, virtual machine, hardware); e. The "owner" responsible for the asset; f. The geographical location of hardware assets; g. Relevance codes on the asset's role in achieving or ensuring the classification criteria.	GIG1
GIS-9.2.4	The classification criteria is as follows: a. Confidentiality of sensitive data (e.g., identification and transaction information); b. Integrity of the system, specifically any asset that affects the functionality of the system and/or has an influence on how sensitive data is stored and/or handled; c. Availability of sensitive data; and d. Accountability of user activity, and how much influence the asset has on the user activity.	GIG1

GIS-9.2.5	Each of the classification criteria shall be assigned a relevance code of: a. 1 - No Relevance: The asset can have no negative impact on the criteria; b. 2 - Some Relevance: The asset can have an impact on the criteria; or c. 3 - Substantial Relevance: The criteria are related to or dependent on the asset.	GIG1	
GIS-9.3	Change Management		
GIS-9.3.1	A CMP shall be implemented for handling updates to the GPE and its Critical System Components based on the propensity for frequent system upgrades and chosen risk tolerance. For a GPE that requires frequent updates, a risk-based CMP may be utilized to afford greater efficiency in deploying updates. Risk-based CMPs typically include a categorization of proposed changes based on regulatory impact and define associated certification procedures for each category.		
GIS-9.3.2	Program change procedures shall be adequate to ensure that only authorized versions of programs and modifications are implemented in the GPE.	GIG1	
GIS-9.3.3	An appropriate software version control mechanism shall be in place for all software components, source code, and binary controls.	GIG1	
GIS-9.3.4	 A CML shall be kept of all new installations and/or modifications to the system, including: a. The date of the installation or modification; b. Details of the reason or nature of the installation or change such as new software, server repair, significant configuration modifications; c. The component(s) to be changed including the unique identification number from the CAR, version information, and if the component being changed is hardware, the physical location of this component; d. The identity of the user(s) performing the installation or modification; and e. The identity of the user(s) responsible for authorizing the installation or modification. 	GIG1	
GIS-9.3.5	 A strategy shall be in place to cover the potential for an unsuccessful install or a field issue with one or more changes implemented: a. Where an outside party such as an App store is a stakeholder in the release process, this strategy shall cover managing releases through the outside party. This strategy may consider the severity of the issue. b. Otherwise, this strategy shall cover reverting back to the last implementation (rollback plan), including complete backups of previous versions of software and a test of the rollback plan prior to implementation to the GPE. 	GIG1	
GIS-9.3.6	A policy addressing emergency change procedures shall be in place. Emergency changes shall be approved, tested, documented, and monitored.	GIG1	
GIS-9.3.7	Procedures shall be in place for testing and migration of changes, including the identification of authorized personnel for signoff prior to release.	GIG1	
GIS-9.3.8	There shall be segregation of duties within the release process.	GIG1	
GIS-9.3.9	Technical and user documentation shall be maintained, such as manuals and user guides, describing the systems in use and the operation, including hardware.		
GIS-9.3.10	Procedures shall be in place to ensure that technical and user documentation is updated as a result of a change.	GIG1	
GIS-9.4	System Development Lifecycle		
GIS-9.4.1	The acquisition and development of new software shall follow defined processes established by the Gaming Enterprise and/or regulatory body.	GIG1	
GIS-9.4.2	The GPE shall be logically and physically separated from the development and testing environments such that no direct connection may exist between the GPE and any other environment.	GIG1	
GIS-9.4.3	The delegation of responsibilities shall be established where applicable.	GIG1	
GIS-9.4.4	The Gaming Enterprise shall establish and document a method for developing software securely, which includes following industry standards and best practices for coding.	GIG1	
GIS-9.4.5	GIS considerations shall be integrated throughout the software development lifecycle, from initial requirements gathering to deployment and maintenance.	GIG1	
GIS-9.4.6	The documented test methodology shall include provisions to a. Verify that test software is not deployed to the GPE; b. Appropriately select, protect, and manage test data; and c. Prevent the use of actual sensitive data or other raw production data in testing.	GIG1	

GIS-9.4.9	All documentation relating to software and application development shall be available and retained for the duration of its lifecycle.	GIG1
GIS-9.5	Patch Management	
GIS-9.5.1	The Gaming Enterprise shall have patch management policies agreed upon with the regulatory body, whether developed and supported by the Gaming Enterprise or by a Service Provider.	GIG1
GIS-9.5.2	The Gaming Enterprise shall monitor and apply patches to all Critical System Components involved in the collection, processing, storage, and transmission of sensitive data.	GIG1
GIS-9.5.3	Whenever possible, all patches shall be tested on a development and testing environment configured identically to the target GPE.	GIG1
GIS-9.5.4	Under circumstances where patch testing cannot be thoroughly conducted in time to meet the timelines for the severity level of the alert and if authorized by the regulatory body, then patch testing shall be risk managed, either by isolating or removing the untested component from the network or applying the patch and testing after the fact.	GIG1



ANNEX I: SCORING THE RISKS

The following scoring system, based on the *Common Vulnerability Scoring System (CVSS)* and the *ISO/IEC 31010 Risk Management – Risk Assessment Techniques*, will be used for assessing the severity of security threats and vulnerabilities. It attempts to assign severity scores to threats and vulnerabilities, allowing prioritization of responses and resources according to the level of severity. Scores are calculated based on a formula that depends on several metrics that approximate ease of exploit and the impact of exploit.

Base Metrics: These metrics represent the most fundamental, immutable qualities intrinsic to vulnerability.

- a. Access Vector: Measures how remote an attacker can be to attack a target.
- b. Access Complexity: Measures the complexity of attack required to exploit the vulnerability once an attacker has gained access to the target system.
- c. Authentication: Measures the number of times an attacker shall authenticate to the target system in order to exploit the vulnerability.
- d. Integrity Impact: Measures the impact on integrity of a successful exploit of the vulnerability on the target system.
- e. Confidentiality Impact: Measures the impact on confidentiality of a successful exploit of the vulnerability on the target system.
- f. Availability Impact: Measures the impact on availability of a successful exploit of the vulnerability on the target system.

<u>Temporal Metrics</u>: These metrics represent the time dependent characteristics that evolve over the lifetime of vulnerability.

- a. Exploitability: Measures how complex the process is to exploit the vulnerability in the target system.
- b. Remediation Level: Measures the level of an available solution.
- c. Report Confidence: Measures the degree of confidence in the existence of the threats and the credibility of its report.

Severity Rankings:

Severity	Score	Action Required
Critical	9.0 – 10.0	A critical vulnerability that shall be addressed immediately.
High	7.0 – 8.9	A vulnerability that presents a high risk and requires immediate attention and planning to remediate in the near future.
Medium	4.0 – 6.9	A vulnerability that presents a medium risk and requires investigation and planning to address during future system security improvements.
Low	0.1 – 3.9	A vulnerability that presents a low risk and should be addressed during routine system maintenance.
Info	0.0	An observation or finding worth noting for possible improvement to meet industry best practices.

ANNEX II: DEFINITIONS OF TERMS

Term	Descriptions
Access	Ability to make use of any GPE resource.
	The process of granting or denying specific requests for obtaining and using
Access Control	sensitive data and related services specific to a system; and to enter specific
	physical facilities which houses critical network or system infrastructure.
Address Resolution Protocol	The protocol used to translate IP addresses into MAC addresses to support
(ARP)	communication on a wireless or wired local area network.
	Policies, procedures, and guidelines implemented by a Gaming Enterprise to
Administrative Controls	manage its GISMS.
Advanced Encryption	A symmetric block cipher that can encrypt (encipher) and decrypt (decipher)
Standards (AES)	information.
	A finite set of unambiguous instructions performed in a prescribed sequence
	to achieve a goal, especially a mathematical rule or procedure used to
Algorithm	compute a desired result. Algorithms are the basis for most computer
	programming.
Application	Computer software that is designed to help a user perform a specific task.
	A record showing who has accessed a system and what operations the user
Audit Trail	has performed during a given period.
	Verifying the identity of a user, process, software package, or device, often as
Authentication	a prerequisite to allowing access to resources in the GPE
Availability	Ensuring timely and reliable access to and use of information.
Backup	A copy of files and programs made to facilitate recovery if necessary.
Biometrics	A biological identification input, such as fingerprints or retina patterns.
	Divides networks to reduce overall network traffic. A bridge allows or prevents
Bridge	data from passing through it by reading the MAC address.
	Applications operating as a shared service for users to collect, process,
Business Applications	maintain, use, share, disseminate, or dispose of sensitive data within the GPE
	for compliance auditing and security incident response purposes
Business Continuity and	A plan for processing critical applications and preventing loss of data in the
Disaster Recovery Plan	event of a major hardware or software failure or destruction of facilities.
	An attack where the attacker inserts corrupt data into the cache database of
Cache Poisoning	the Domain Name Service (DNS).
	Any method used, and the components employed, to facilitate the
Communications	transmission and receipt of information, including transmission and reception
Technology	by systems using wire, wireless, cable, radio, microwave, light, fiber optics,
	satellite, or computer data networks, including the Internet and intranets.
Compliant	The policy and evidence viewed was considered to be fully compliant with the
Compliant	GLI-GSF.
Confidentiality	Preserving authorized restrictions on information access and disclosure,
	including means for protecting personal privacy and proprietary information.
	Management policy and procedures designed to maintain or restore gaming
Contingency Plan	operations, possibly at an alternate location, in the event of emergencies,
	system failures, or disaster.
Critical System Component	Any hardware, software, communications technology, other equipment or
	components implemented in a GPE to allow patron participation in gaming,
	and whose failure or compromise can lead to loss of patron entitlements,
	government revenue or unauthorized access to data used for generating
	reports for the regulatory body. Examples of Critical System Components
	include, but are not limited to:
	Components which record, store, process, share, transmit or retrieve
	sensitive data.
	Components which generate, transmit, or process random numbers used
	to determine the outcome of games and events.

Term	Descriptions
	Components which store results or the current state of a patron's game,
	wager, or available funds.
	Software programs that control behaviors relative to any applicable
	technical standard and/or regulatory requirement, such as executables,
	libraries, gaming or system configurations, operating system files,
	components that control required system reporting, and database
	elements that affect gaming or system operations.
	Points of entry to and exit from the above components, including other eventure which components directly with Critical System Components.
	systems which communicate directly with Critical System Components.
	 Communications technology and networks which transmit sensitive data. Corporate networks and systems that interface with the GPE and from
	Corporate networks and systems that interface with the GPE and from which attackers could use to move laterally into the GPE, including
	corporate casinos' networks and online operators' corporate networks.
	Hardware, software, firmware, or combination thereof that implement
	cryptographic functions such as encryption, decryption, signatures, hashing,
Cryptographic Module	and key management. The primary purpose of a cryptographic module is to
	provide secure processing and storage of keys and operations.
	The property that data is both accurate and consistent and has not been
Data Integrity	altered in an unauthorized manner in storage, during processing, and while in
- ,	transit.
	A type of attack where multiple compromised systems, usually infected with a
Distributed Denial of Service	destructive software program, are used to target a single system. Victims of a
(DDOS)	DDOS attack consist of both the end targeted system and all systems
	maliciously used and controlled by the hacker in the distributed attack.
Domain Name Service (DNS)	The globally distributed internet database which (amongst other things) maps
	machine names to IP numbers and vice-versa.
Domain	A group of computers and devices on a network that are administered as a unit with common rules and procedures.
	A network service that allows devices to request a configuration from a central
Dynamic Host Configuration	point. First a request is broadcasted over the network segment, then any
Protocol (DHCP)	servers respond to that specific machine with an address, how long that
11010001 (21101)	address is good for, and other pertinent details.
	The amount of data that actually can be transferred across a network per unit
Effective Bandwidth	of time. The effective bandwidth through the Internet is usually considerably
	lower than the bandwidth of any of the constituent links.
	The conversion of data into a form, called a ciphertext, which cannot be easily
Encryption	understood by unauthorized people. Where encryption is not possible due to
Eneryption	a technology or performance limitation, other reasonable protective measures
	shall be implemented in its place and reviewed on a case-by-case basis.
Encryption Key	A key that has been encrypted in order to disguise the value of the underlying plaintext.
	Applications that are public facing and discoverable through reconnaissance
Externally-Exposed	and network scanning from the public internet outside of the enterprise's
Applications	network. This does not apply to applications intended for patron use.
	Assets that are public facing and discoverable through Domain Name System
Externally-Exposed	reconnaissance and network scanning from the public internet outside of the
Enterprise Assets	enterprise's network. This does not apply to assets intended for patron use.
Firewall	A component of a computer system or network that is designed to block
	unauthorized access or traffic while still permitting outward communication.
Gaming Enterprises	Entities who oversee or are integrated to the functionality of a GPE, including
Canning Linespies	the management of sensitive data.
Gaming Information Security	Protecting sensitive data and Critical System Components from unauthorized
(GIS)	access, use, disclosure, disruption, modification, or destruction in order to
(/	provide integrity, confidentiality, and availability.

Term	Descriptions
Gaming Information Security	A defined, documented management system that consists of a set of policies,
Management System	processes, and systems to manage risks to a Gaming Enterprise's sensitive
(GISMS)	data, assets, and Critical System Components within a GPE, with the
(Clowe)	objective of ensuring acceptable levels of GIS risk.
	The operational setting where gaming activities and related services are
	conducted, managed, and delivered to patrons in a live or real-time manner.
Gaming Production	It encompasses the physical and virtual infrastructure, systems, software, and
Environment (GPE)	processes required to facilitate various forms of gaming and/or manage
	sensitive data, as well as the backend systems and infrastructure that
	interface and/or support gaming activities.
Gatoway	Any device, system, or software application that can perform the function of translating data from one format to another. The key feature of a gateway is
Gateway	that it converts the format of the data, not the data itself.
	A document that delineates the security management structure and clearly
GIS Policy	assigns security responsibilities and lays the foundation necessary to reliably
,	measure progress and compliance.
	An occurrence that actually or potentially jeopardizes the integrity,
	confidentiality, or availability of an GPE or the sensitive data the GPE
GIS Incident	processes, stores, or transmits or that constitutes a violation or imminent
	threat of violation of security policies, security procedures, or acceptable use
	policies.
GIS Incident Response Plan	The documentation of a predetermined set of instructions or procedures when
Cio moident response i iun	a malicious cyberattack is encountered against a Gaming Enterprise's GPE
	A method of organizing user accounts into a single unit (by job position)
Group Membership	whereby access to system functions may be modified at the unit level and the
	changes take effect for all user accounts assigned to the unit.
Hash Algorithm	A function that converts a data string into an alpha-numeric string output of fixed length.
	The underlying protocol used to define how messages are formatted and
Hypertext Transport Protocol	transmitted, and what actions servers and browsers shall take in response to
(HTTP)	various commands.
	Connects devices on a twisted-pair network. A hub does not perform any tasks
Hub	besides signal regeneration.
Into with	Guarding against improper information modification or destruction, and
Integrity	includes ensuring information non-repudiation and authenticity.
Internet	An interconnected system of networks that connects computers around the
Internet	world via TCP/IP.
Internet Protocol Address (IP	A unique number for a computer that is used to determine where messages
Address)	transmitted on the Internet should be delivered. The IP address is analogous
1.32.000)	to a house number for ordinary postal mail.
	A system that inspects all inbound and outbound network activity and
Intrusion Detection	identifies suspicious patterns that may indicate a network or system attack
System/Intrusion Prevention	from someone attempting to break into or compromise a system. Used in
System (IDS/IPS)	computer security, intrusion detection refers to the process of monitoring computer and network activities and analyzing those events to look for signs
_ , , ,	of intrusion in the GPE.
	A protocol suite for securing Internet Protocol (IP) communications by
	authenticating and encrypting each IP packet of a data stream. IPsec also
IP Security (IPSec)	includes protocols for establishing mutual authentication between agents at
	the beginning of the session and negotiation of encryption keys to be used
	during the session.
Kerberos	A network authentication protocol designed to provide strong authentication
Verneros	for client/server applications by using secret-key encryption.
Key	A value used to control cryptographic functions, such as decryption,
1 C y	encryption, decryption, signatures, hashing etc.

Term	Descriptions
Key Management	Activities involving the handling of encryption keys and other related security parameters (e.g., passwords) during the entire lifecycle of the keys, including their generation, storage, establishment, entry, and output, and zeroization.
Link Utilization	The percentage time that a communications link is engaged in transmitting data.
Message Authentication Code (MAC)	A cryptographic checksum on data that uses a symmetric key to detect both accidental and intentional modifications of the data.
Malware	A program that is inserted into a system, usually covertly, with the intent of compromising the integrity, confidentiality, or availability of the victim's data, applications, or operating system or of otherwise annoying or disrupting the victim.
"Man-In-The-Middle" Attack	An attack where the attacker secretly relays and possibly alters the communication between two parties who believe they are directly communicating with each other.
Major Non-Conformity (MaNC)	 A fundamental failing (systematic) has been identified that affects several controls and means that the overall security policies cannot be adhered to. It may be either: A number of minor non-conformities against one control can represent a total failure of the system and thus be considered a major non-conformance; or Any non-conformance that would result in the probable shipment of a non-conforming product. A condition that may result in the failure or materially
	 reduce the usability of the products or services for their intended purpose; or A non-conformance that judgment and experience indicate is likely either to result in the failure of the system or to materially reduce its ability to assure controlled processes and products. Until resolved, such an issue will normally mean the Gaming Enterprise is not compliant with the GLI-GSF.
Message Authentication	A security measure designed to establish the authenticity of a message by means of an authenticator within the transmission derived from certain predetermined elements of the message itself.
Minor Non-Conformity (MiNC)	A control has not been addressed or is not compliant with the GLI-GSF (non-systematic) and that judgment and experience indicate is not likely to result in the failure of the system or reduce its ability to assure controlled processes or products. It may be either: • A failure in some part of the system relative to a control; or • A single observed lapse in following one item of the system. A course of action to remedy this should be provided with an appropriate timeline.
Mobile Code	Executable code that moves from computer to computer, including both legitimate code and malicious code such as computer viruses.
Multi-Factor Authentication (MFA)	 A type of authentication which uses two or more of the following to verify a user's identity: Information known only to the user (e.g., a password, pattern or answers to challenge questions); An item possessed by a user (e.g., an electronic token, physical token, or an identification card); and A user's biometric data (e.g., fingerprints, facial or voice recognition).
Network Communication Equipment (NCE)	One or more devices that controls data communication in a system including, but not limited to, cables, switches, bridges, hubs, routers, wireless access points, and telephones.
Network Interface Card (NIC)	The mechanism by which terminals and systems connect to the network. NICs can be add-in expansion cards, PCMCIA cards, or built-in interfaces.

Term	Descriptions
	A policy is in place, but it is either not fully compliant with the GLI-GSF or the
Observation (OBS)	supporting evidence (or lack thereof) raised potential concerns. Any issues
	which are likely to become a non-conformance if not treated until the next audit
	are marked with this status.
Password	A string of characters (letters, numbers, and other symbols) used to
Password	authenticate an identity or to verify access authorization.
	Sensitive data that could potentially be used to identify a particular patron.
	Examples include a legal name, date of birth, place of birth, social security
Personally identifiable	number (or equivalent government identification number), driver's license
information (PII)	number, passport number, residential address, phone number, email address,
	debit instrument number, credit card number, bank account number, or other
Dava and Idantification	personal information if defined by the regulatory body.
Personal Identification Number (PIN)	A numerical code associated with an individual and which allows secure
Number (PIN)	access to a domain, account, network, system, etc. The measures implemented to protect physical assets, facilities, and
Physical and Environmental	environmental conditions that house the Gaming Production Environment's
Controls	systems and infrastructure.
	A physical entry or exit point of a module that provides access to the module
Port	for physical signals, represented by logical information flows (physically
	separated ports do not share the same physical pin or wire).
	An application that "breaks" the connection between client and server. The
	proxy accepts certain types of traffic entering or leaving a network and
Proxy	processes it and forwards it. This effectively closes the straight path between
,	the internal and external networks. Making it more difficult for an attacker to
	obtain internal addresses and other details of the internal network.
Protocol	A set of rules and conventions that specifies information exchange between
11010001	devices, through a network or other media.
Remote Access	Any access from outside the system or system network including any access
	from other networks within the same site or venue.
Risk	The likelihood of a threat being successful in its attack against a network or
	System.
Router	Connects networks together. A router uses the software-configured network address to make forwarding decisions.
Secure Communication	A communication protocol that provides the appropriate confidentiality,
Protocol	authentication, and content integrity protection.
Secure Shell (SSH)	Allows tunneling any other protocol in a secure manner.
Secure Shell (Sec.)	Information, often stored as a text file that is used by the Transport Socket
Security Certificate	Layer (TSL) Protocol to establish a secure connection. In order for a TSL
	connection to be created, both sides shall have a valid Security Certificate.
	Information that shall be handled in a secure manner, such as PII, gaming
	data, validation numbers, location data, authentication credentials, PINs,
Sensitive Data	passwords, financial transactions, transfers of funds, patron tracking
	information, software packages, secure seeds and keys, RNG seeds, and any
	information which affects outcomes.
Server	A running instance of software that is capable of accepting requests from
	clients, and the computer that executes such software. Servers operate within
	a Client-Server Architecture, in which "servers" are computer programs
	running to serve the requests of other programs ("clients").
	Entities that offer platforms, software, and services to Gaming Enterprises.
Service Providers	Examples include IT consultants, managed service provider, Software as a Service (SaaS) platforms, and cloud service providers. Third-party providers
	and vendors are also considered Service Providers.
Service Set Identifier (SSID)	A name that identifies a particular 802.11 wireless LAN.
OCTAICE OEL INCHITIEL (OOID)	A hame that identifies a particular 002.11 wileless LAIV.

Term	Descriptions
Shellcode	A small piece of code used as a payload in the exploitation of security. Shellcode exploits vulnerability and allows an attacker the ability to reduce a system's information assurance.
Simple Network Management Protocol (SNMP)	A protocol used to configure, view, and in general, manage networked devices. Networked printers, switches, etc. often implement this protocol by default.
Social Engineering	An attempt to trick someone into revealing information (e.g., a password) that can be used to attack systems or networks. Social engineering attacks include non-technical intrusions into a GPE using information acquired through human interaction and rely on tricks that prey on an individual being unfamiliar with emerging technology and protocols.
Source Code	A text listing of commands to be compiled or assembled into an executable computer program.
Stateless Protocol	A communications scheme that treats each request as an independent transaction that is unrelated to any previous request so that the communication consists of independent pairs of requests and responses.
Switch	Connects devices on an 802.3 network. A switch forwards data to its destination by using the MAC address embedded in each packet.
System Administrator	The individual(s) responsible for maintaining the stable operation of the GPE (including software and hardware infrastructure and application software).
Technical Controls	The security mechanisms implemented within Gaming Production Environment's systems and infrastructure to protect against unauthorized access, data breaches, and other security threats.
Threat	Any circumstance or event with the potential to adversely impact network operations (including mission, functions, image, or reputation), assets, or individuals through a system via unauthorized access, destruction, disclosure, modification of information, and/or denial of service; the potential for a threat-source to successfully exploit a particular vulnerability; any potential danger to a network that someone or something may be able to identify as being vulnerable, and therefore seek to exploit.
Time Stamp	A record of the current value of the date and time which is added to a message at the time the message is created.
Transmission Control Protocol/Internet (TCP/IP)	The suite of communications protocols used to connect hosts on the Internet.
Unauthorized Access	A person gains logical or physical access without permission to a network, system, application, data, or other resource.
User Datagram Protocol (UDP)	A transport protocol that does not guarantee delivery. Thus, it is faster, but less reliable.
Verification	Ensuring by electronic signature checking that any software package is an authentic copy of the software created by its manufacturer and, if applicable, an exact copy of the software as certified by the Independent Test Laboratory (ITL).
Version Control	The method by which evolving approved Critical System Components are verified to be operating in an approved state.
Virtual Private Network (VPN)	A logical network that is established over an existing physical network and which typically does not include every node present on the physical network.
Virus	A self-replicating program, typically with malicious intent, that runs and spreads by modifying other programs or files.
Virus Scanner	Software used to prevent, detect and remove computer viruses, including malware, worms and Trojan horses.
Vulnerability	Software, hardware, or other weaknesses in a network or system that can provide a "door" to introducing a threat.
Wired Equivalent Protocol (WEP)	An easily broken and therefore deprecated algorithm to secure IEEE 802.11 wireless networks. It was originally intended to allow the same level of

Term	Descriptions
	protection as a wired connection, but flaws were soon discovered after its adoption that made it barely better than no protection at all.
Wireless Access Point (WAP)	Provides network capabilities to wireless network devices. A WAP is often used to connect to a wired network, thereby acting as a link between wired and wireless portions of the network.
Wi-Fi	The standard wireless local area network (WLAN) technology for connecting computers and electronic devices to each other and/or to the internet.
Wi-Fi Protected Access (WPA)	The successor to WEP. Its authentication can be broken under certain circumstances, but sufficiently complex passphrases are secure enough for most uses.
Workstation	An interface for authorized personnel to access the regulated functions of the GPE.

